

CIVIL RIGHTS PROGRAMS COMPLIANCE



Metro[®]

**LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY
WHEELCHAIR ACCESSIBILITY REPORT
Fiscal Year 12 - Quarter 4**

TABLE OF CONTENTS

Introduction	2
Background	2
Methodology	3
Presentation of Results	3
Reporting Items:	
1. Pass-Ups	4
2. Securement Issues	5
a. Operations Notice #11-070	5
b. Wheelchair Securement	6
c. Lap & Shoulder Belt Assistance	7
3. Discourteous Treatment	8
Appendix A: Fiscal Year Time Frame	A-1
Appendix B: Operations General Notice OPS # 11-070	B-1
Appendix C: Bus Lines Surveyed in FY12 Q4	C-1



Figure 1: Metro Rapid Bus in front of Downtown Los Angeles nighttime skyline

INTRODUCTION

Metro has implemented a “Mystery Rider” program to observe bus operator performance, and to use reported results to identify trends or conditions requiring corrective action. The Mystery Rider program helps Metro monitor and measure bus operator compliance with rules, standard operating procedures, and customer expectations, with an emphasis on Americans with Disabilities Act (ADA) accessibility, safety, and customer service.

The "Mystery Rider" program is an effective monitoring tool based on "mystery" or "secret" shopper techniques. This method is used to measure quality of service, compliance with regulations, or other operating rules. The mystery consumer's identity is not known to the business operation being evaluated, and the mystery consumer can be used in any industry, including government agencies.

BACKGROUND

Metro’s Mystery Rider program is based on the settlement of an ADA civil rights lawsuit involving Metro passengers with disabilities who use wheelchairs. The lawsuit was filed by Metro passengers with disabilities who had difficulties with accessibility and complaints about bus operator performance and treatment regarding boarding, securement (tie-downs), and occupant restraints (seat belts).

ADA regulations and California state law guarantee the civil rights of individuals with disabilities to receive equal access to all public transportation services. These laws require that transit services and vehicles be readily accessible to, and usable by, individuals with a wide range of disabilities and who use mobility aids, wheelchairs, attendants, service animals, and respirators or portable oxygen supplies.

Passengers with a disability who use a wheelchair must be allowed to board and alight vehicles as freely as passengers who do not have a disability. Bus operators are responsible to curb the bus, kneel the bus and use lifts and ramps appropriately, to assist the passenger in reaching the designated securement area, and to apply the wheelchair securements, including the use of lap and shoulder belts (upon request of the passenger).

Areas of focus for the Mystery Rider program are monitoring Metro’s service, identifying goals for improvement, and implementing any needed changes. The topics observed, as reported in the attached charts, are:

1. *Pass-ups*
2. *Compliance with procedures for wheelchair securement*
3. *Proper wheelchair securement*
4. *Offer of lap and shoulder belt*
5. *Discourteous treatment*

The program also monitors a number of other areas related to accessibility, safety, and customer service, for use by Metro in quality assurance and internal management. As required for any employee performance report, all surveys are handled on a confidential basis.

In addition to the Mystery Rider program and any corrective actions needed based on the results, Metro has already instituted a number of efforts for improvement in wheelchair accessibility:

- A “wheelchair marking and tether strap program”, featuring auxiliary aids for securement that are offered free of charge to all wheelchair users
- Additional and improved bus operator training and procedures
- Written/pictorial educational pieces for both bus operators and passengers
- An improved, easy-to-use website that features a “Riders with Disabilities” menu tab on the homepage, and sub-pages on “Bus Accessibility” and the “Safety Straps for Mobility Devices” program

METHODOLOGY

Metro’s mystery riders conduct over 200 bus rides per month, blending in with other passengers to appear as typical riders, including riders using wheelchairs. However, mystery riders are specially trained by Metro staff in standards for operations, accessibility, and customer service. After each ride, survey data is submitted and analyzed, and used for various reports.

Observations are made evenly throughout the month and across Metro’s five local service council areas: San Fernando Valley, Westside/Central, South Bay, Gateway Cities, and San Gabriel Valley. Rides last a minimum of 20 minutes, and at least half the rides are during peak service hours (5:00 am – 9:00 am and 3:00 pm – 7:00 pm). See Appendix C for the bus lines surveyed in this quarter.

Additional criteria for monitoring bus lines are volume of service hours and boardings, boarding of riders in wheelchairs, and passenger accessibility complaints. Further attention and improvements are guided by information from customer service data and community involvement. Aside from these prescribed considerations, Mystery Ride assignments are random.

Mystery Riders may leave survey questions blank or select ‘Not Applicable’ when a question was not observable or did not pertain to the ride. This explains why there are different sample sizes for different questions.

For the purposes of this report, the term “wheelchair” follows the ADA definition, which includes manual wheelchairs, power wheelchairs, and mobility scooters (both 3- and 4-wheeled) of the type designed and sold for persons with disabilities. “Wheelchair” does not include Segway-type devices or “rollators” (4-wheeled walkers), but those devices are covered by separate federal rules for accommodation on transit, as well as by Metro policies and procedures. Appropriate service to users of non-wheelchair mobility devices is covered under the Mystery Rider program, but it is not the subject of the currently published reports.

PRESENTATION OF RESULTS

The reporting of Mystery Rider results for wheelchair-related topics began with results for July 2011, and the first report for comparative purposes covered two quarters, July-September and October-December 2011. That report is posted on Metro’s web site, along with this and other subsequent quarterly reports (visit *metro.net*; see *Getting Around, Specialized Guides*; click *Riders with Disabilities*; click the desired ‘Reports’ item to view a quarterly report).

1.0 PASS-UPS

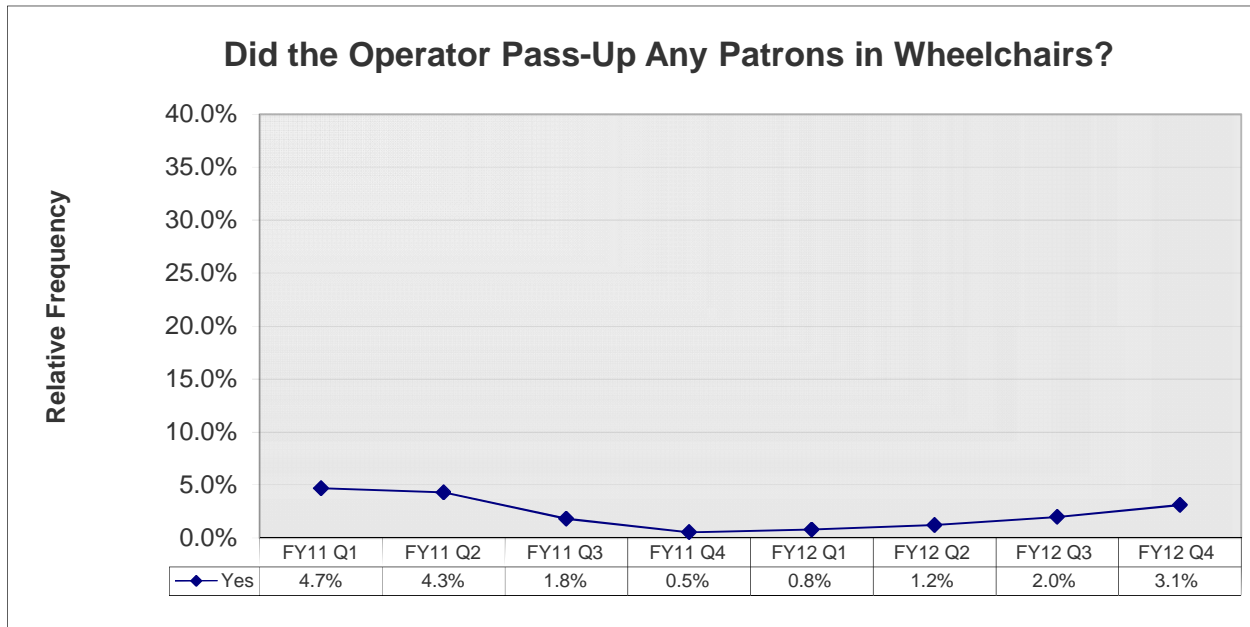


Figure 1.1

Passing up patrons who use wheelchairs has been occurring at a rate of 3% or less since FY11 Q3. Because the trend is moving away from full compliance, the Operations Central Instruction (OCI) unit has begun redistribution of learning materials designed to emphasize bus service procedures for customers who use wheelchairs.

Did the Operator Pass-Up Any Patrons in Wheelchairs?

Fiscal Year 2012 Quarter Four		
<i>Passed-up</i>	<i>Number of Responses</i>	<i>Relative Frequency</i>
Yes	8	3.1%
No	249	96.9%
TOTAL	257	100%

Table 1.1

2.0 SECUREMENT ISSUES

2.1 Operations Notice #11-070

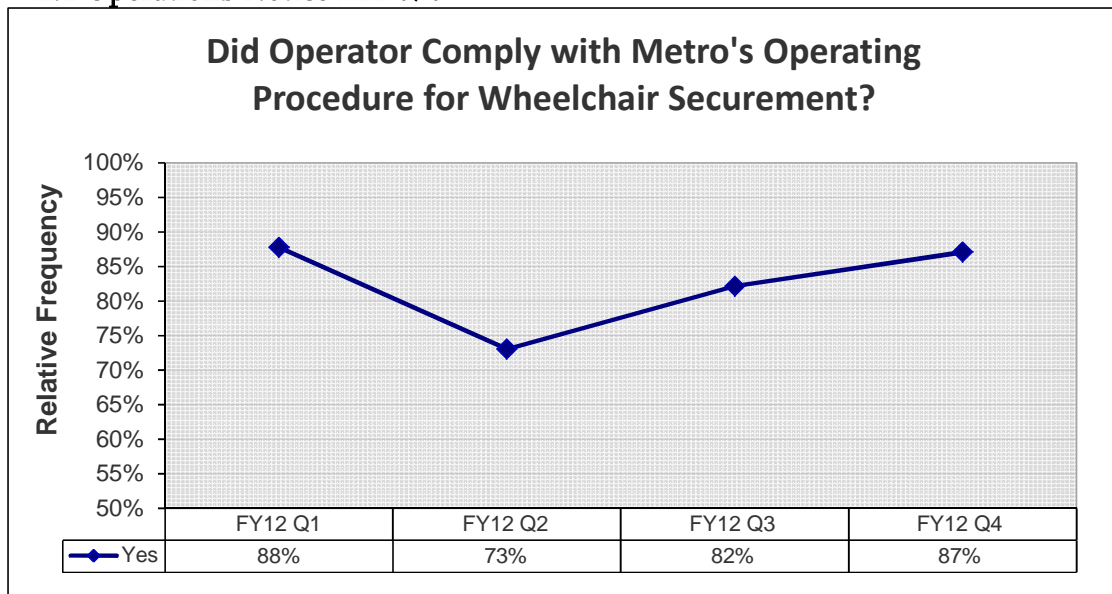


Figure 2.1

Operator compliance with Metro's updated wheelchair securement procedure (revised in October 2011 – see Appendix B) increased in Q3 of FY12 and again in Q4, approaching the same levels as Q1 when the updated procedure became effective. Improved training for new students and focused efforts with existing Operators appear to be having a positive impact in this area.

The procedure requires Operators to complete each of the following steps for securement:

- Rise from the driver's seat
- Ask passengers to vacate the securement area (as needed)
- Prepare the securement area, by lifting folding seats, etc.
- Announce that they will be securing the wheelchair
- Secure the wheelchair (with floor tie-downs), unless passenger refuses securement.

(Note: The procedure for offering the lap and shoulder belt is covered separately in Mystery Rider reporting -- see figure 2.3.)

Did Operator Comply with Metro's Operating Procedure for Wheelchair Securement?

Fiscal Year 2012 Quarter Four		
<i>Complied with Ops #11-070</i>	<i>Number of Responses</i>	<i>Relative Frequency</i>
Yes	189	87%
No	28	13%
TOTAL	217	100%

Table 2.1

2.2 Proper Securement

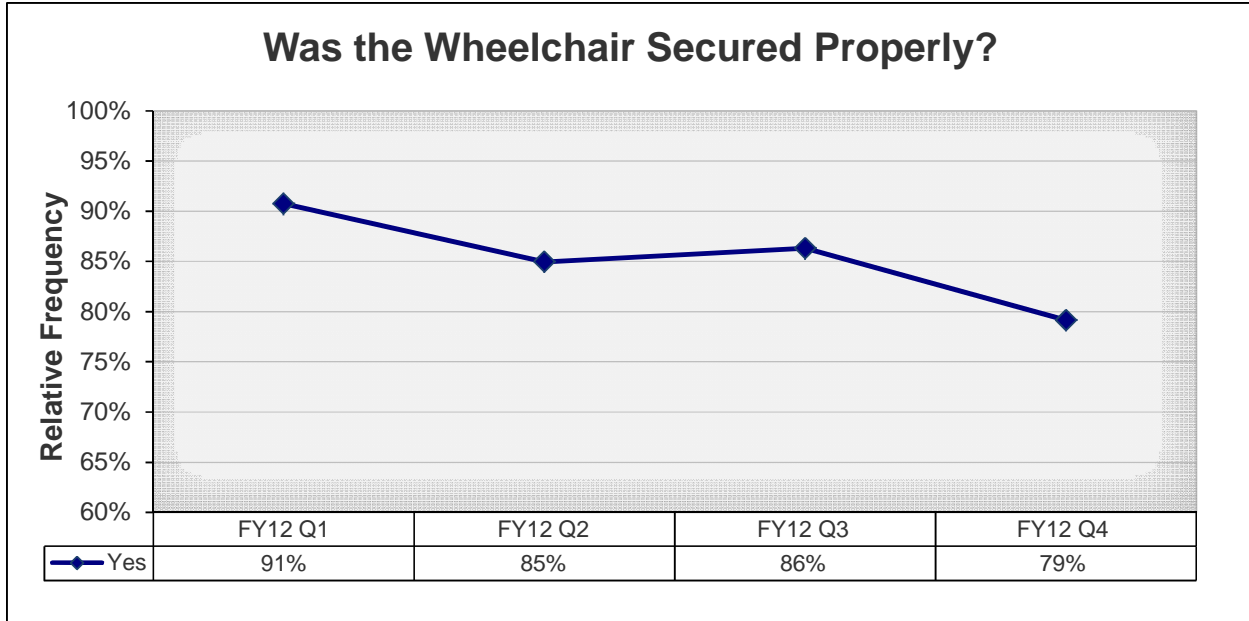


Figure 2.2

In addition to reporting compliance with following the wheelchair securement procedure described in Ops #11-070, Mystery Riders observe whether or not the wheelchair was secured properly, meaning a minimum of three (3) tie-down straps were used, two in front and one in the rear of the wheelchair so that it does not move more than two inches (or if available, the rear wheel clamp device for manual wheelchairs). Wheelchairs were properly secured 79% of the time in FY12 Q4. Although there is an increase in Operators following procedures for both wheelchair (tie downs) and passenger (lap and shoulder belt) securement, the trend of wheelchairs being *properly* secured is decreasing, pointing to a need for hands-on wheelchair securement training or demonstration. OCI is developing an ADA recertification module specifically focusing on mobility device securement and disability awareness.

Was the Wheelchair Secured Properly? (3-point or 4-point securement)

Fiscal Year 2012 Quarter Four		
<i>Properly Secured</i>	<i>Number of Responses</i>	<i>Relative Frequency</i>
Yes	148	79%
No	39	21%
TOTAL	187	100%

Table 2.2

2.3 Lap & Shoulder Belt Assistance

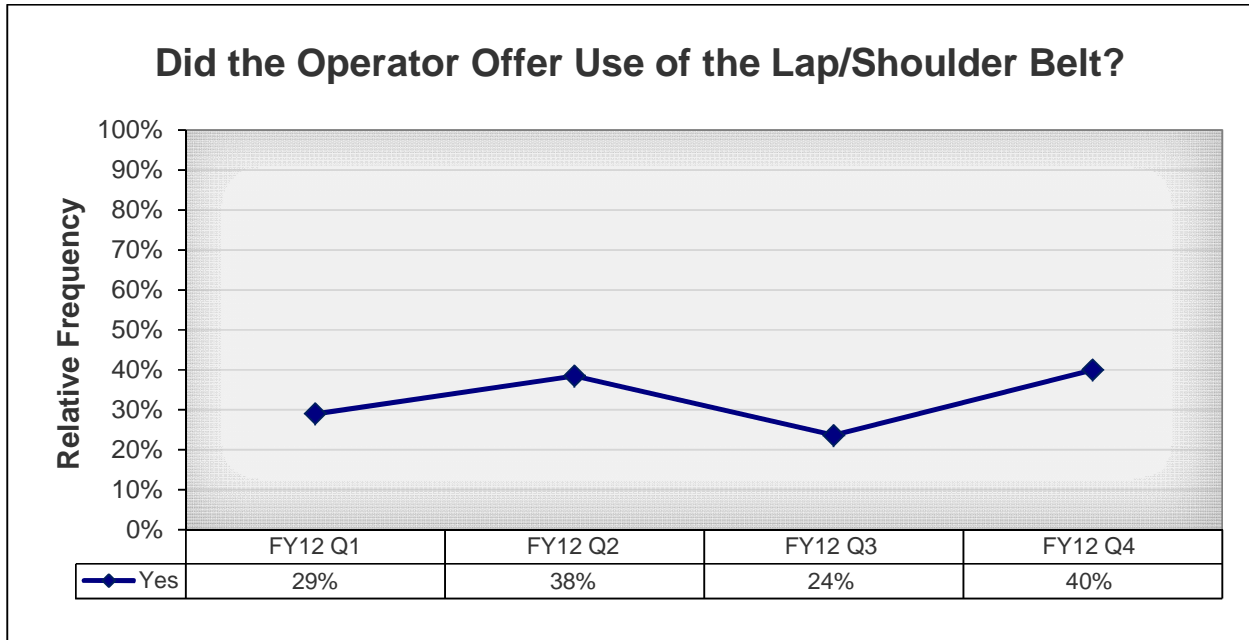


Figure 2.3

In Q4 of FY12, 40% (60 of 150) of Operators offered use of the lap/shoulder belt to passengers in wheelchairs who had not declined securement. This is the highest compliance rate for the fiscal year. As noted for 2.1, it is believed that improved training for new students and focused efforts with existing Operators appear to be having a positive impact.

Did the Operator Offer Use of the Lap/Shoulder Belt?

Fiscal Year 2012 Quarter Four		
<i>Offer Lap/Shoulder Belt</i>	<i>Number of Responses</i>	<i>Relative Frequency</i>
Yes	60	40%
No	90	60%
TOTAL	150	100%

Table 2.3

3.0 DISCOURTEOUS TREATMENT

Operators' treatment toward wheelchair users is reported as "Good" or "Better" 93% of the time in June 2012, the first full month for which the data has been recorded. Not surprisingly, a statistically expected bell curve is found in the results. Metro will employ a combination of commendation incentive and remedial sensitivity training programs with the objective of moving more experiences into the "Good" and "Excellent" categories.

The criteria used to determine the courteousness of an Operator is as follows:

- Excellent – Exceptionally courteous and helpful
- Good – Normal, acceptable interaction
- Poor – Discourteous

For both "Excellent" and "Poor" ratings, the action(s) must be accompanied by objective descriptions rather than being reported based solely on opinion.

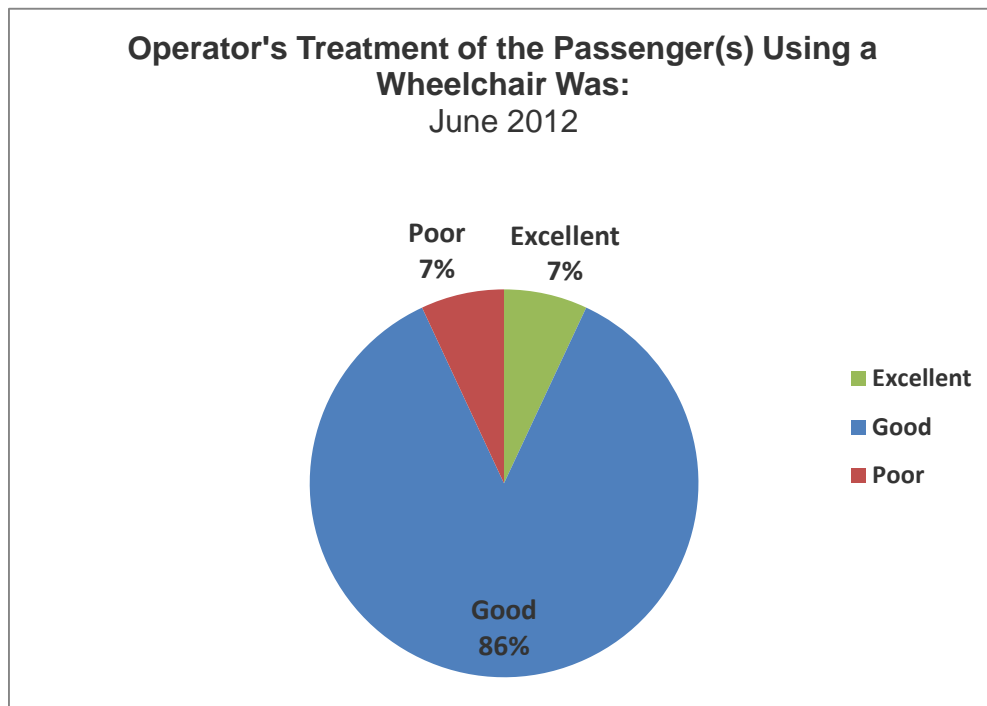


Figure 3.1

Operator's Treatment of the Passenger(s) Using a Wheelchair

Fiscal Year 2012 Quarter Four		
<i>Treatment</i>	<i>Number of Responses</i>	<i>Relative Frequency</i>
Excellent	5	7%
Good	62	86%
Poor	5	7%
TOTAL	72	100%

Table 3.1

Fiscal Year Time Frame

Metro's fiscal years begin on the first of July and end on the 30th of June (e.g., FY11 is from July 1, 2010 to June 30, 2011); the fiscal year is designated by the calendar year in which it ends. Below is a list of the time frames for the fiscal years and quarters used in this report:

- FY11 Q1: July 1, 2010 – September 30, 2010
- FY11 Q2: October 1, 2010 – December 31, 2010
- FY11 Q3: January 1, 2011 – March 31, 2011
- FY11 Q4: April 1, 2011 – June 30, 2011
- FY12 Q1: July 1, 2011 – September 30, 2011
- FY12 Q2: October 1, 2011 – December 31, 2011
- FY12 Q3: January 1, 2012 – March 31, 2012
- FY12 Q4: April 1, 2012 – June 30, 2012

OPERATIONS GENERAL NOTICE

REVISED

OPS # 11-070

October 14, 2011

TO REMAIN POSTED UNTIL FURTHER NOTICE

SUBJECT: Wheelchair Securement

A revision to OPS #11-070 (dated June 22, 2011) is required to address issues identified by operators and the disabled community. Requirements for rising from the seat and preparing the securement area remain the same. However, addressing the customer and offering use of the lap and shoulder belt require revision. The revisions are highlighted for implementation:

When the customer has boarded and is in the securement area, the Operator must:

- Announce in a clear, distinct voice, “With your permission, I am going to secure your wheelchair”;
- Wait approximately 2-3 seconds for a response:
- If the customer indicates or clearly states that he/she does not desire assistance and/or does not wish to be secured, the Operator must permit the customer to ride unsecured;
- Unless the customer gives indication otherwise, the Operator is to proceed with securing the wheelchair in the prescribed manner;
- Operator is to offer the use of the lap and shoulder belt. If the customer indicates or clearly states that he/she does not desire the use of the lap and shoulder belt the Operator is to abide by the customer’s wishes.



Metro

If the customer is a regular rider who has previously made it known that he/she does not wish to be secured, the Operator is to continue to ask the customer each and every time they board the bus in a clear, distinct voice, *"Do you still want to ride unsecured?"* Unless the customer gives indication otherwise, the Operator is to proceed with securing the wheelchair **as noted in the bullets above.**

If the customer refuses securement, BOC must be notified immediately as required by rules and procedures.

Please contact your Transportation Operations Manager should you have any questions.

A handwritten signature in blue ink, appearing to read "John Roberts". The signature is stylized with a large, sweeping initial "J" and "R".

John Roberts
Executive Director, Transportation

Bus Lines Surveyed in FY12 Q4

There were 108 different bus lines surveyed for the Mystery Rider Program during FY12 Quarter Four. Below is a list of those lines along with a description of their service area.

Line	Service Area
Line 2	Between Downtown LA and Pacific Palisades, via Sunset BI
Line 4	Between Downtown LA and West Los Angeles and Santa Monica, via Santa Monica BI
Line 10	Between Downtown LA and West Hollywood, via Temple St & Melrose Av
Line 14	Between Downtown LA and Beverly Hills, via Beverly BI
Line 16	Between Downtown LA and Century City, via 3rd St
Line 18	Between Wilshire Center, Downtown LA and Montebello, via 6th St & Whittier BI
Line 20	Between Downtown LA and Santa Monica, via Wilshire BI
Line 28	Between Downtown LA and Century City, via West Olympic BI
Line 30	Between Pico/Rimpau, Downtown LA and Indiana Station, via Pico BI & East 1st St
Line 33	Between Downtown LA and Santa Monica, via Venice BI
Line 35	Between Downtown LA and Washington/Fairfax, via Washington BI
Line 37	Between Downtown LA and Washington/Fairfax, via Adams BI
Line 38	Between 17th/Broadway and Washington/Fairfax, via Jefferson BI
Line 40	Between Downtown LA, LAX and the South Bay Galleria, via ML King BI, La Tijera BI and Hawthorne BI
Line 42	Between Downtown LA, LAX and the South Bay Galleria, via ML King BI, La Tijera BI and Hawthorne BI
Line 45	Between Lincoln Heights, Downtown LA and Rosewood, via Broadway
Line 51	Between Wilshire Center, Downtown LA and Compton and Artesia Transit Center, via Avalon BI
Line 52	Between Wilshire Center, Downtown LA and Compton and Artesia Transit Center, via Avalon BI
Line 53	Between Downtown LA and CSU Dominguez Hills, via Central Av
Line 55	Between Downtown LA and Imperial/Wilmington Station, via Compton Av
Line 60	Between Downtown LA and Artesia Station, via Long Beach BI
Line 62	Between Downtown LA and Hawaiian Gardens, via Telegraph Rd
Line 66	Between Wilshire Center, Downtown LA and Montebello, via 8th St & Olympic BI
Line 68	Between Downtown LA and Montebello, via Cesar E Chavez Av
Line 70	Between Downtown LA and El Monte, via Garvey Av
Line 71	Between Downtown LA and Cal State LA, via Wabash Av & City Terrace Dr
Line 76	Between Downtown LA and El Monte, via Valley BI
Line 78	Between Downtown LA and Arcadia, via Las Tunas Dr & Huntington Dr
Line 81	Between Eagle Rock, Downtown LA and Harbor Fwy Station, via Figueroa St
Line 83	Between Downtown LA and Eagle Rock, via York BI & Pasadena Av
Line 84	Between Downtown LA and Eagle Rock, via Eagle Rock BI

APPENDIX C

Line 90	Between Downtown LA and Sunland, via Glendale BI & Foothill BI
Line 92	Between Downtown LA and Burbank (Metrolink) Station, via Glendale BI & Brand BI & Glenoaks BI
Line 94	Between Downtown LA and Sun Valley, via San Fernando Rd
Line 102	Between Baldwin Village and South Gate, via Coliseum St
Line 105	Between West Hollywood and Vernon, via La Cienega BI & Vernon Av
Line 108	Between Marina Del Rey and Pico Rivera, via Slauson Av
Line 110	Between Playa Vista and Bell Gardens, via Jefferson BI
Line 111	Between LAX City Bus Center and Norwalk Station, via Florence Av
Line 115	Between Playa del Rey and Norwalk, via Manchester & Firestone BI
Line 117	Between LAX City Bus Center and Downey, via Century BI & Imperial Hwy
Line 120	Between Aviation Station and Whittwood Mall, via Imperial Hwy
Line 150	Between Canoga Park and Universal City Station, via Ventura BI & Northridge via Reseda BI
Line 152	Between Woodland Hills and North Hollywood Station, via Fallbrook Av & Roscoe BI & Lankershim BI
Line 156	Between Van Nuys, Hollywood and Panorama City, via Cahuenga BI & Van Nuys BI
Line 158	Between Chatsworth (Metrolink) Station and Sherman Oaks, via Devonshire St & Woodman Av
Line 161	Between Thousand Oaks Transit Center and Warner Center, via Westlake Village, Agoura Hills & Calabasas
Line 163	Between West Hills Medical Center and Sun Valley, via Sherman Way & Lankershim BI
Line 164	Between West Hills and Burbank (Metrolink) Station, via Victory BI
Line 165	Between West Hills and Burbank (Metrolink) Station, via Vanowen St
Line 166	Between Chatsworth (Metrolink) Station and Sun Valley, via Nordhoff St & Osborne St
Line 169	Between West Hills Medical Center and Sunland, via Saticoy St & Sunland BI
Line 180	Between Hollywood, Glendale and Pasadena, via Los Feliz BI & Colorado BI
Line 181	Between Hollywood, Glendale and Pasadena, via Los Feliz BI & Colorado BI
Line 183	Between Sherman Oaks and Glendale (Metrolink) Station, via Magnolia BI
Line 190	Between El Monte Station and Cal Poly Pomona, via Ramona BI & Valley BI
Line 200	Between Echo Park and Exposition Park, via Alvarado St & Hoover St
Line 204	Between Hollywood and Athens, via Vermont Av
Line 206	Between Hollywood and Athens, via Normandie Av
Line 207	Between Hollywood and Athens, via Western Av
Line 210	Between Hollywood/Vine Station and South Bay Galleria, via Crenshaw BI
Line 212	Between Hollywood/Vine Station and Hawthorne Station, via La Brea Av
Line 217	Between Vermont/Sunset Station and Fairfax/Washington, via Hollywood BI & Fairfax Av
Line 222	Between Sun Valley and Hollywood, via Hollywood Way & Barham BI & Cahuenga BI
Line 224	Between Sylmar (Metrolink) Station and Universal City Station, via San Fernando Rd & Lankershim BI
Line 230	Between Mission College and Studio City, via Laurel Canyon BI
Line 233	Between Lake View Terrace and Sherman Oaks, via Van Nuys BI

Line 234	Between Mission College and Sherman Oaks, via Van Nuys BI
Line 236	Between Sylmar (Metrolink) Station and Encino, via Glenoaks BI & Balboa BI & Van Nuys BI
Line 240	Between Canoga Park and Universal City Station, via Ventura BI & Northridge via Reseda BI
Line 245	Between Chatsworth (Metrolink) Station and Woodland Hills, via De Soto Av & Topanga Canyon BI
Line 246	Between San Pedro and Artesia Transit Center, via Avalon BI
Line 251	Between Cypress Park and Lynwood, via Soto St
Line 252	Between Cypress Park and Lynwood, via Soto St
Line 258	Between Alhambra and Paramount, via Fremont Av & Easter Av
Line 260	Between Altadena and Artesia Blue Line Station, via Fair Oaks Av & Atlantic BI
Line 265	Between Pico Rivera and Lakewood Center Mall, via Paramount BI
Line 267	Between Altadena and El Monte, via Lincoln Av & Del Mar BI & Temple City BI
Line 268	Between La Cañada Flintridge and El Monte, via Baldwin Av & Washington BI
Line 292	Between Sylmar (Metrolink) Station and Burbank (Metrolink) Station, via Glenoaks BI
Line 305	Between Westwood, Leimert Park, South LA and Willowbrook, via Sunset BI & Crenshaw BI & Florence Av & Wilmington Av
Line 311	Between LAX City Bus Center and Norwalk Station, via Florence Av
Line 460	Between Downtown LA and Disneyland, via Harbor Transitway & I-105 Fwy
Line 487	Between Downtown LA, and El Monte Station, via Sierra Madre Villa Station
Line 534	Between Malibu and Washington/Fairfax Transit Hub, via Pacific Coast Hwy
Line 550	Between West Hollywood and San Pedro, via Harbor Transitway
Line 612	South Gate, Shuttle
Line 687	Between Altadena and Pasadena, via Los Robles Av & Fair Oaks Av
Line 704	Between Downtown LA and Santa Monica, via Santa Monica BI
Line 705	Between West Hollywood and Vernon, via La Cienega BI & Vernon Av
Line 710	Between Wilshire Center and South Bay Galleria, via Crenshaw BI
Line 720	Between Santa Monica and Commerce, via Wilshire BI & Whittier BI
Line 728	Between Downtown LA and Century City, via W Olympic BI
Line 730	Between Downtown LA and Pico/Rimpau, via Pico BI
Line 733	Between Downtown LA and Santa Monica, via Venice BI
Line 734	Between Sherman Oaks and Sylmar (Metrolink) Station, via Sepulveda BI
Line 740	Between Downtown LA and Redondo Beach, via Hawthorne BI & ML King BI
Line 741	Between Northridge and Tarzana, via Reseda BI
Line 745	Between Downtown LA and Harbor Freeway Station, via Broadway
Line 750	Between Warner Center Transit Hub and Universal City Station, via Ventura BI
Line 754	Between Hollywood and Athens, via Vermont Av
Line 761	Between Pacoima and Westwood, via Van Nuys BI & Sepulveda BI
Line 762	Between Pasadena and Artesia Blue Line Station, via Atlantic BI
Line 770	Between Downtown LA and El Monte Station, via Garvey Av & Cesar E Chavez Av
Line 780	Between Washington/Fairfax and Pasadena, via Fairfax Av & Hollywood BI & Colorado BI

APPENDIX C

Line 794	Between Downtown LA and Sylmar (Metrolink) Station, via San Fernando Rd
Line 901	Metro Orange Line between North Hollywood and Warner Center
Line 910	Metro Silver Line between El Monte, Downtown LA and Artesia Transit Center

Los Angeles County
Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.6000
metro.net

