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Summarized Comments from Stakeholders on the Mobility Action Plan – Draft Strategic Implementation Plan (SIP)

The Draft SIP received comments from 18 stakeholders. The following are the compiled comments in order of SIP Recommendation:

1. Regulatory amendment to TDA Unmet Needs Process to require TPA & SSTAC Joint Decision-Making

- Regarding the SIP recommendation to legislatively amend the TDA Unmet Needs Process to require SSTAC and TPA Joint Decision-Making; one response replied that the SSTAC is an advisory committee and should remain as such. It should not have decision-making authority.
- Social Services Transportation Advisory Council's role in Unmet Transit Needs. The SSTAC for the San Luis Obispo region already reviews and comments on the unmet transit needs before the SLOCOG Board takes action on the annual determination. The process described is already in place and does not warrant a legislative change.
- The time needed for the entire committee to review every request would be excessive. (Stakeholder) currently reviews and discusses the major requests before they are taken to the Board. SSTAC is an advisory committee, not a decision-making body, and should remain as such. Please ensure any amendments do not create unreasonable requirements for SSTACs.
- If the structure for SSTAC participation becomes a requirement, and represent a stronger voice in the decision making process, limited TDA dollar uses that should be determined at the local level could be diluted or used for transportation services that should be funded under new or different state or federal programs.
- SSTAC's have a voice at the local level. My recommendation would be to allow SSTAC's a seat on regional Technical Advisory Committee meetings.

2. Legislative amendment to the TDA farebox recovery ratio requirements based upon TDA Working Group findings

- Having a Farebox Recovery Ratio (FBRR) recommendation for a survey and follow up sounds great.
- Farebox Ratio Requirements. This recommendation is not fully developed. Under the Strategy Description, "Implementation of this strategy would require legislative modifications to the TDA statutes to modify..." (Text is missing). Similarly under the Recommendation, Implementation of this strategy would require legislative modifications to the TDA statutes to reduce..." (Text is missing). The report needs to expand upon the scope of the TDA recommendation.
- One response agrees the issue to legislatively amend the TDA farebox recovery ratio requirements based on TDA Working Group findings merits examination; agencies within (the responder's) jurisdiction are struggling with farebox requirements. Ensure any legislative amendments simply and clarify the statutes

Draft

- rather than complicate them. Also, be aware that changes to the farebox requirements could affect reasonable to meet criteria.
- The Draft SIP says “the TPA may set the farebox ratio at any level they desire if the service is for seniors and people with disabilities.” This is incorrect. The flexibility exists for any service funded under TDA Articles 4.5 or 8, no matter who the ridership is.
 - The 2005 survey findings quoted on are out of date; in addition more recent data about farebox ratios is readily available to DMT from the triennial performance audit reports filed with the state as well as from the annual fiscal audits filed with the State Controller. Conducting a survey of the RTPA’s and have them summarize farebox ratio trends for their respective transit agencies could assist Caltrans in this endeavor without involving the much larger pool of individual operators.
 - Use of Local support. The SLOCOG region allows the use of local support toward the farebox recovery ratio. This is not an issue in our region.
 - Concur that the issue of TDA farebox recovery ratio requirements deserves examination. Some transit agencies are struggling with the current farebox requirements. Requests that the requirements be made more feasible for all different types of transit operators and that statutes be made clearer and simpler. This recommendation should be a priority. However, changes to the farebox requirements could affect unmet transit needs “reasonable to meet” criteria for many RTPAs.

3. Modify Coordinated Plan Funding Guidance Requiring Inclusion of Unmet Needs Information in Plans

- Page 25. The statement to have “more frequent Coordinated Plan updates” does not take into account the associated cost to the RTPA’s. We project that a new Coordinated Plan would warrant more than doubling the current costs associated with the Unmet Needs. Federal legislation identifying or mandating a cycle for Coordinated Plan updates does not exist; that point should not be stated by Caltrans at this time.
- Including the unmet need criteria and definitions in the Coordinated Plans of unrestricted counties, makes good sense.
- Unmet Transit Needs and Coordinated Planning Requirements. The finding of “overlap and duplication” between the two processes is overstated. There is at most partial overlap. The Unmet Transit Needs Process encompasses the general population; it is not limited to the target groups which are the focus of the Coordinated Plan. The Unmet Transit Needs is an annual process that gets very specific to each request received; the Coordinated Plan has a much longer cycle and deals with more general barriers/gaps identification. Each year an inventory of transit resources is prepared ahead of the unmet needs process for the preparation of the Annual Needs Assessment. Only that assessment is what could be appended into future Coordinated Plans. In addition the Unmet Transit Needs findings are already an integral part of the Coordinated Plan in the same way as recent short range transit plans by the individual providers and transit needs assessments by the region.

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- Incorporating unmet transit needs information into the Coordinated Plan by reference. Including a full appendix would make the document unnecessarily long.
- Unmet Transit Needs Process. The points raised about the “lack of understanding” of the details of the local unmet needs process seem to be overstated. A full documentation (public outreach, public input, SSTAC involvement and method used in the determination) is sent to Caltrans each year; there have been plenty of opportunities for DMT to comment on the approaches taken to date and identify any areas in need of improvement. The criteria used for unmet needs review also vary by region and remain the prerogative of each RTPA.
- Suggests incorporating unmet transit needs information into the Coordinated Plan by reference.

4. Modify Coordinated Plan Funding Guidance to Provide Scoring Preference for CTSAs

- One stakeholder agrees CTSAs should be given scoring preference.
- Scoring Preference/Priority for CTSA’s. This preference is already part of the FTA 5310 program under the Coordination criteria, which tends to exclude smaller applicants from the pool of funded projects. The CTSA also receives a large “off the top” allocation in Local Transportation Funds (LTF) per TDA Article 4.5 for its exclusive use. In regard to small discretionary programs like FTA 5316 or 5317, we believe those grants should stay truly competitive and that individual projects should be ranked on their won merit and in relation to the Coordinated Plan priorities regardless of their affiliation with the CTSA. In addition, giving the “first priority” to CTSA applications would not follow the Federal guidelines.
- Although (the commenter) represent an area of the state which currently has no designated CTSAs, and therefore will likely lose competitiveness in scoring for 5310 vehicles under the CTSA scoring preference recommendation, (the commenter) can see that this and similar policies will create incentives for MTC and other MPOs to create CTSAs where previously none had been. I can assure you that I and others in the Bay Area are already beginning to use this argument with MTC to encourage them to begin a CTSA designation process. So I applaud you for creating this approach and encourage the MAP PAC to look creatively at other benefits that could be created for CTSAs that would further incentivize the designation of CTSAs throughout the state.
- On the other hand, I still think that creative coordination efforts by agencies that cannot or desire not to become CTSAs should not be excessively penalized by a pro-CTSA process, such as the proposed 5310 scoring priority proposed in the SIP. At the very least, there should be some level of priority scoring (1 extra point instead of 2, for example) for those non-CTSA agencies that demonstrate excellence in mobility management services.
- One stakeholder cannot support the strategies outlined in Recommendation #4 (as listed on page 6 of the draft report) for prioritizing CTSAs in the statewide Section 5310, 5316 and 5317 scoring processes. If implemented this year for

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- Section 5310, this recommendation would put the entire Bay Area, with 21% of the state's over-65 population and 18% of the state's population with a disability, at a substantial competitive disadvantage for funding, since there are currently no CTSA's designated in the region that provide transportation services.
- Minimally, implementation of Recommendation #4 (scoring preference for CTSA's) should be subsequent to implementation of Recommendations #9 (establish web-linkages with the State and TPA's on Unmet Needs) and #10 (develop educational training module and materials for decision-makers related to CTSA's) in order to make information and training about CTSA's available statewide prior to implementing statewide changes in scoring priorities, so as not to put those portions of the state that currently do not have CTSA's designated at any immediate disadvantage in scoring priority.
 - By linking CTSA's to programs like the FTA 5310, (this stakeholder) believes the State has found that nexus to energize a more robust network of CTSA's, hopefully statewide. Couple this strategy with mobility management and the state can move forward on the national level.
 - One stakeholder provided additional requirements for CTSA's and others procuring 5310 vehicles and potential for uniformity on local level: require all to use fleet inventory system approved/selected by the state (e.g. FIRM via web portal). Also require social service and aging agencies and others getting 5310 vehicles to adhere to FTA standards for drug and alcohol policies and testing, FTA requirements for maintenance programs and nationwide criminal background checks. This would eliminate a few of the major challenges to vehicle sharing and coordinating if all entities meet common standards. It is not cost prohibitive because even taxi companies working with paratransit entities statewide meet those FTA standards in order to do paratransit. And finally, require health and human services agencies procuring 5310 vehicles to provide some "proof" of good faith coordination with transit/paratransit, as appropriate, in an equitable manner to that there is not an undue burden on either party and duplication of efforts can be minimized. A CTSA could provide that documentation and/or the Paratransit entity in the area.
 - Stakeholder concurs that CTSA's should be given scoring preference.
 - Stakeholder recommends SIP Recommendation #4 not be implemented in the near term. Specifically, Recommendation #4 pertains to giving priority scoring for federal Section 5310, 5316 and 5317 funding to agencies designated as Consolidated Transportation Service Agencies (CTSA's). The Metropolitan Transportation Commission region has no CTSA's designated at this time. Implementing this recommendation would create an additional barrier to accessing much needed funding in Sonoma County.

CTSA Questions/Opportunity for Points on the Section 5310 Application:

- An additional two (2) points can be obtained for applicants that have not previously been transportation providers by providing a letter of support from the RTPA or CTSA.
- Discuss any attempts the agency has made to coordinate. If unable to coordinate, explain why. Provide supporting documentation letter from CTSA or RTPA confirming that no opportunities for coordination currently exist for requested equipment. If the applicant clearly identifies attempts the agency has made to coordinate and explains why coordinating isn't possible and provides supporting documentation letter from CTSA or RTPA confirming that no opportunities for coordination currently exist for requested equipment, = maximum six (6) points.

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5. Modify Coordinated Plan Funding Guidance (Plan organization, detail and performance standards)

- The three topics covered (Plan organization, Plan detail and Mobility Management) have little to do with Coordinated Plan “Funding”. We suggest that the title be revised to match the content.

6. Monitor and Follow the DCHS Efforts to Amend the TAR Process

- SBCTAC concurs.

7. Coordinate Efforts to Develop a State-Level NEMT Research Pilot Project on Public Transit Reimbursement

- Regarding the SIP recommendation to coordinate efforts to develop a State-Level NEMT Research Pilot Project on Public Transit Reimbursement, one response recommended to be sure to address the issue of the need to transport clients’ potentially long distances to very specialized services available only in certain urbanized areas.
- Perhaps there needs to be a working group that is linked into the current HHS process on the state level to better understand and influence how transportation expenses may be bundled or not bundled with health reform. It is critical that engagement occurs at that level early. (this stakeholder) would suggest that the best investment in time is to plan for the future health care program coming (in terms of MediCal transportation) more than solving the exiting challenges which will not be the same in the future.
- Consider using Mobility Management as the tool for future Medi-Cal trips as Health Reform unfolds.
- Regarding NEMT and pilot projects, I'd really encourage speaking with the Santa Cruz County Medi-Cal Managed Care agency (the Central California Alliance for Health, which essentially addressed the Dialysis and other Medi-Cal transportation issue full on, providing those services effectively. CMS ultimately came back to them and disallowed the expense, despite their overall costs falling under the capitated rate. That resulted in the service model being shut down since the funding mechanism was eliminated.
- I have spoken with IEHP (Inland Empire Health Plan). They are the mandatory managed health plan for Medi-Cal recipients in San Bernardino County. Medi-Cal has transportation as one of the authorized services. IEHP is required to provide transportation to its members, out of their existing funds. (Limited benefit)
The State is moving forward on making mandatory managed care a requirement for all Medi-Cal recipients. If the mandatory managed care program were implemented, the HMOs would have to provide transportation. A brokerage model could then be used to provide transportation, at a lower cost. But there would be a loss of funds available, directly, to transit.
- Stakeholder concurs; public transit reimbursement for NEMT is logical and necessary. Stakeholder would like to request that the Strategic Implementation Plan address the issue of the need to transport clients potentially long distances to very specialized medical services that are available only in certain urbanized areas, including specific consideration of and planning for the related costs associated with long-distance transportation that may not be adequately covered by existing NEMT funding.

8. Coordinate Efforts to Develop a State-Level NEMT Transportation Brokerage Pilot Project

- Regarding the SIP recommendation to Coordinate Efforts to Develop a State-level NEMT Transportation Brokerage Pilot Project: The San Diego model is not difficult to

Draft

- implement for any of the entities using Trapeze or similar software packages. This could be implemented without a new major brokerage system study or other costs. (this stakeholder) has reviewed the San Diego Agreement – currently under revisions – and their billings. This depends on the paratransit provider(s) and how the county organizes their health services, and if HHS does not discourage replication of the model.
- Regarding the SIP recommendation to coordinate efforts to develop a State-Level NEMT Brokerage Pilot Project, one response recommended to be sure to address the issue of the need to transport clients' potentially long distances to very specialized services available only in certain urbanized areas.
 - Regarding NEMT and pilot projects, I'd really encourage speaking with the Santa Cruz County Medi-Cal Managed Care agency (the Central California Alliance for Health, which essentially addressed the Dialysis and other Medi-Cal transportation issue full on, providing those services effectively. CMS ultimately came back to them and disallowed the expense, despite their overall costs falling under the capitated rate. That resulted in the service model being shut down since the funding mechanism was eliminated.
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The State is moving forward on making mandatory managed care a requirement for all Medi-Cal recipients. If the mandatory managed care program were implemented, the HMOs would have to provide transportation. A brokerage model could then be used to provide transportation, at a lower cost. But there would be a loss of funds available, directly, to transit.
 - Stakeholder suggests evaluating how existing CTSAAs can be utilized in this effort, including the impact on existing TDA CTSA allocations, existing TDA performance evaluation, as well as any additional funding needed to provide this brokerage service. SBCTAC requests that the Strategic Implementation Plan address the issue of the need to transport clients potentially long distances to very specialized medical services that are available only in certain urbanized areas.

9. Establish Web-Linkages With the State and Transportation Planning Agencies on Unmet Needs

- Regarding the SIP recommendation to establish web-linkages with the State and Transportation Planning Agencies on Unmet Needs, one commented that if Caltrans would like the information to be in a consistent format for all RTPAs, Caltrans may need to house the information on its own website rather than link to RTPA websites. RTPAs may not have a logical place within their website structures to post additional unmet needs information.
- If posting the Transit Needs Assessment report on (this stakeholders) website is not sufficient, suggests Caltrans post the information on its own website.

10. Develop Educational Training Module and Materials for Decision-Makers related to CTSAAs

- Parties are already moving forward on ways to better fund TDA and create more revenues. One discussion includes mileage based fees (CTSAAs need to be exempt if that comes). The point is that we need to keep our eye on the ball in terms of TDA funding and how it is generated and to also consider piggybacking on

Draft

additional or new initiatives yet to be suggested. In the Bay Area, (this stakeholder) will likely have to waive any opportunity for TDA funding as part of their request to be re-designated as a CTSA. From 1982 to 1992 this stakeholder did receive TDA dollars but from 1992 to 1995 had to waive it so that the dollars could go elsewhere for paratransit. Once paratransit was consolidated, CTSA's were not re-designated. Looking back, coordination with health and human services greatly declined and as paratransit demand grew greatly as it became the only option. In the long run, a new or additional source of funding to add to the revenue for CTSA's may need to be identified, especially for those of us who may never access TDA funds.

11. Establish Web-Linkages and Information for Sharing on Value of CTSA's

- Regarding the SIP recommendation to establish web-linkages and information for sharing on value of CTSA's, one response suggested to work with CalACT to avoid duplication of effort.
- Stakeholder believes this information is valuable but cautions Caltrans to be conscious of creating additional work for CTSA's. Stakeholder requests that once the linkages are established, Caltrans take the lead in ensuring the data remains updated. Please also work with CalACT to avoid duplication of effort.

12. Interagency Work Effort to Establish State Coordinated Oversight Entity in California

- Regarding the SIP recommendation #12 on Interagency Work Effort to Establish State Coordinated Oversight Mechanism in California, the value of a Mobility Coordinating Council is unclear.
- State MOUs with entities like Aging, HHS, etc. should require local coordination on the community level with CTSA's.
- Mobility Coordinating Council. This proposal appears to duplicate the earlier recommendation for forming a statewide empowered framework.
- The added value of a Mobility Coordinating Council is unclear.

CTSA Draft SIP Report Comments:

- CTSA involvement in Coordinated Planning could be mandated by State Mandatory CTSA concurrence on JARC, NF awards? CTSA be designated as default Mobility Managers unless another agency is setup and willing and able to perform in that role CTSA's can be charged with Cross County Coordination.
- One stakeholder is somewhat torn regarding the SIP's recommendations regarding CTSA's. On the one hand, the goal should be to create policies that encourage and incentivize coordination activities that meet certain criteria or standards regardless of the operating agency's title or designation. On the other hand, the CTSA model is one that if strengthened could really help to more fully launch mobility management and related coordination activities in the state.
- Part of background or issue should be that the SAFETEA-LU now requires coordination adding emphasis to what could be termed as a renaissance of the CTSA function, both federal and state.
- CTSA's may compete against other claimants for these funds.

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- Regional Workshops for Decision Makers. It is the responsibility of the RTPA to keep its policy makers informed and aware of ongoing or proposed projects, including those related to the CTSA. We do not see a strong rationale or added benefits with Caltrans putting on such regional workshops as proposed.
- As others consider moving forward on CTSA's or enhancing what they have in place, a stakeholder would like to see Caltrans among other agencies push the envelope on advantages and benefits statewide for all CTSA's.
- Any number of additional (capital and operating) procurement advantages to CTSA's would be welcome, especially those that defray operation costs for communications and technology, energy costs; as well as access to resources to move the network of CTSA's more "green" (vehicles, solar chargers, solar buildings, etc.).
- Identifying additional ways to elevate CTSA's so they are better positioned to apply for funding from a variety of different programs well beyond the traditional transit side would be welcome. For example, if CTSA's can be given priority with grants (e.g. air quality; solar energy; chargers; technology, and from the other state agencies (e.g. CalEMA, etc.) that will be involved in your coordination council on the state level, etc.).
- Identifying ways to further protect CTSA's from legal action would be welcome. For example, public transit agencies are often protected on matters related to rest periods and meal periods that non-public (non-profit CTSA's) are not.
- It is wise to use what is in statute (CTSA's) now and push forward in a prompt and timely manner. The SIP document creates the foundation for this renewed focus, elevates the importance of CTSA's, and provides a clear commitment from the state.
- Page 36. Caltrans working cooperatively with CTSA's. The SLOCOG policy makers are fully aware about the CTSA's existence and role. The CTSA Executive Director gives annual updates to the regional Board highlighting accomplishments, new projects and mix of services. This activity does not warrant Caltrans' involvement.
- With the introduction of SAFETEA-LU, federal USDOT funding became available for the operation of mobility management. This funding provides the CTSA with customized options in the operation of a regional and/or local model. In a regional setting the CTSA could use the money for an in-house brokerage, perhaps arranging for trips across jurisdictional boundaries. In a local setting, the CTSA could work with local agencies in their development of mobility management centers for their customers. In either case mobility management provides an organized approach to better meet the needs of the traveling public.
-