
Barriers for Parents with Disabilities Traveling with Children on ADA Complementary Paratransit

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Through the Looking Glass*

Abstract

Ninety-two transit agencies from across the United States completed a survey of their policies and procedures that impact parents with disabilities traveling with minor children. Results indicate that certain policies make it difficult for parents to use paratransit. These policies include limiting the number of children who can accompany a parent, lack of access to chain rides (i.e., no scheduled waits), lack of driver assistance with car seats, not providing car seats, not allowing storage of car seats on vehicles, and fares for adults and children that make regular use of paratransit cost prohibitive, particularly for parents on a fixed income. These policies have serious consequences for parents to obtain and maintain employment, meet their children's educational, childcare, and medical needs, and, in some cases, even retain custody of their children. Contained in the article are recommendations to make paratransit systems more accessible to parents with disabilities.

Keywords: *Parents with disabilities, Riding paratransit with children, Paratransit policies*

Background

Under the Americans with Disabilities Act (ADA), transit agencies are required to provide ADA complementary paratransit services to individuals whose disability prevents them from using fixed-route bus or rail. These services must be provided for travel within $\frac{3}{4}$ mile of fixed-route systems and must be complementary to the fixed route in terms of hours and days of operation. Accessible transportation allows people with disabilities to access needed services, pursue employment, participate in their communities, engage with others socially, and lead active lives (American Association of People with Disabilities, n.d.).

One of the most important roles for many adults is being a parent. For parents, having access to transportation to meet their children's needs is essential, whether that involves transportation to occasional doctor appointments, play dates, or daily trips to

daycare. Although individuals with disabilities increasingly are becoming parents, their prevalence has not yet been reflected in public policy or community resources such as transit systems (National Council on Disability 2012). The failure to recognize that an increasing number of people with disabilities are parents has resulted in paratransit policies that do not fully accommodate these parents' unique needs.

From more than 30 years of providing services to parents with disabilities and their families, Through the Looking Glass (TLG) is familiar with the numerous barriers to parents' use of paratransit services when traveling with young children and the resulting consequences for their families. For some parents with disabilities involved in custody cases, transportation challenges have made it difficult for them to attend visitations with their children (Kirshbaum et al. 2003). Missing visitations or court-ordered appointments clearly can have negative repercussions for parents involved in custody cases, including contributing to loss of custody of their children.

Accessing transportation can be challenging for people with disabilities. A national transportation availability and use survey found that 12% of people with disabilities reported difficulty in accessing transportation compared to 3% of those without disabilities (U.S. Department of Transportation 2002). The survey further found that more than half of paratransit riders (53%) reported difficulties with paratransit.

Transportation barriers seem to be an even larger problem among parents with disabilities. A national study by Toms-Barker and Maralani (1997) conducted for TLG found that 79% of parents with disabilities reported that transportation problems limited or interfered with parent-child activities. Similarly, when TLG conducted the Parents with Disabilities and Deaf Parents Task Force with 55 San Francisco Bay Area representatives, transportation was identified as impacting parenting with a disability more than any other factor. Specific concerns were raised about Bay Area paratransit policies affecting parents' ability to ride paratransit with their children. These concerns included whether children are allowed to travel with their parents, whether a personal assistant is allowed to ride with a parent in addition to a child, and whether paratransit can be used to transport a non-ADA eligible child to a childcare center or school (Preston 2006). The National Council on Disability found in its report regarding parents with disabilities that "many parents with disabilities face barriers to traveling with their families using paratransit services" (2012, 28).

Paratransit services may not be designed or implemented in a way to meet the needs of many eligible riders. Rosenbloom (2007) reported that most paratransit trips were taken by just a few riders, with many eligible riders—even those having been certified—never using paratransit. In one study of ridership in the JAUNT paratransit system in central Virginia, 47% of the trips were taken by just 7% of riders (Bearse et al. 2004).

There has been increasing recognition that some groups of potential paratransit riders have unique needs, and their ability to use paratransit may depend on making specific accommodations to services. Among these groups are older adults as baby boomers age (Marin County Civil Grand Jury 2013; Metaxatos 2012; Bailey 2004; Bailey et al. 2007), dialysis patients (Denson 2007), and adults with autism (Freeley 2010). Although there has been increasing awareness and research on these groups, there has been limited or

no research on parents with disabilities who travel on paratransit with young children. This is an important research need, as we know that in the United States 6% of parents of children under 18 have a disability (Kaye 2012).

Despite the lack of research, parents' needs are starting to become apparent to at least a few transit agencies. Access Services in Los Angeles was awarded a federal New Freedom grant in 2010–2011 to provide premium paratransit services to parents with disabilities who travel with their children. Because parents are a growing segment of the disability community, transit agencies are highly encouraged to begin searching for ways to meet their unique needs to ensure that parents with disabilities are not being denied access to paratransit. To learn more about paratransit policies that impact parents' ability to use paratransit with young children, TLG conducted a national survey of agencies providing ADA complementary services.

Methodology

Sample

Paratransit Managers or their designees from 117 public transportation agencies providing ADA complementary paratransit services were recruited to complete a questionnaire about their services and policies impacting parents traveling with minor children. Participating agencies were not randomly selected for participation in the study; rather, the sample was a convenience sample of agencies that the researchers were aware of that had received awards for best and innovative services, agencies that had completed prior surveys conducted by a consultant to the current study, and agencies located in states with high rates of disabilities among adults of childbearing ages. Specifically, the agencies included for recruitment were those identified by the Community Transportation Association of America (CTAA) for Best Practices, CTAA's 2006 community-based transportation planning grantees, recipients of the 2010 CTAA awards, participants in CTAA 2010 professional workshop sessions, Easter Seals Project ACTION paratransit presenters, and advisory committee members or reviewers for the Federal Transit Administration's (FTA's) Office of Civil Rights-funded ADA Transportation Topic Guides (Golden and Thatcher 2010). Additionally, transit agencies that had responded to past national surveys such as those included in the "2007 Public Transportation Programs for Seniors Final Report," prepared by the Beverly Foundation in partnership with the American Public Transportation Association (APTA), and Nelson/Nygaard Consulting Associates' (2008) "Status Report on the Use of Wheelchairs and Other Mobility Devices on Public and Private Transportation," prepared for Easter Seals Project ACTION, were targeted for participation.

The decision to sample some of the most innovative systems stemmed from the recognition that parents with disabilities are a segment of the disability community whose needs are not frequently recognized, fully understood, or adequately addressed. By outreaching to systems using best practices, we hoped to include agencies that were taking steps to specifically meet parents' needs. In our recruitment, efforts were undertaken to ensure that transit agencies in each of the 10 FTA regions were recruited to participate by selecting several agencies in each region and agencies serving rural, urban, and suburban areas as determined by the Rural Institute of Montana website

data. Also targeted for recruitment were paratransit agencies in the 10 states identified as having the highest rates of disability for people ages 21–64 (i.e., Alabama, Alaska, Arkansas, Kentucky, Louisiana, Maine, Mississippi, Oklahoma, Tennessee, and West Virginia) in the “Disability Status Report” (2008), which analyzes data from the 2008 American Community Survey (ACS). Although we sought to obtain responses from paratransit agencies in every region, agencies in the 10 states with the highest rates of disability among childbearing age adults, and agencies serving rural, suburban, and urban areas, there was no plan to recruit additional agencies in the event that we were not successful in our recruitment.

Materials

A 29-item survey was developed for this research project. TLG’s experience in assisting parents with disabilities with their transportation needs through our National Center for Parents with Disabilities and Their Families informed question development, as did findings obtained from TLG’s past survey and task force reports: Toms-Barker and Maralani’s (1997) *National Survey of Parents with Disabilities* and Preston’s (2006) *Bay Area Parents with Disabilities and Deaf Parents Task Force Report*. Richard Weiner of Nygaard Consulting Associates; Annette Williams, Accessible Services Manager at San Francisco Municipal Transportation Agency; and Karen Hoesch, Executive Director of ACCESS Transportation Systems in Pittsburgh reviewed drafts of the questionnaire and provided suggestions for eliminating, adding, and revising questions. Parents with disabilities who had traveled on paratransit with a young child also provided feedback on survey questions. The survey covered general paratransit policies, practices, and procedures; issues around a parent scheduling a paratransit trip; use of car/booster seats in vehicles; and agency experience in transporting parents with disabilities traveling with minor children. Table 1 includes a list of survey questions.

TABLE 1.
List of Survey Questions

1	Please provide your paratransit agency’s name.
2	About how many trips were provided during your last fiscal year?
3	Where are ADA paratransit eligibility assessments conducted? (<i>Transit office, Local social service agencies, Applicants’ homes, Other—please specify other sites, I don’t know</i>)
4	If registrants indicated they need to travel with a personal care attendant during the eligibility assessment, may they ride without one? (<i>Yes, No, I don’t know</i>)
5	Does your agency require any type of professional verification of a registrant’s need for a personal care attendant? (<i>Yes, No, I don’t know</i>)
6	Do paratransit drivers offer assistance in carrying packages/items to these locations? (<i>To the curb, To the door, Other—please specify other locations</i>), <i>No assistance is provided in carrying packages/items, I don’t know</i>)
7	Do you provide SAME day trips on a space available basis? (<i>Yes, No, I don’t know</i>)
8	Some parents with disabilities are able to ride the fixed-route bus system when traveling alone. If they cannot safely navigate the same route when traveling with the minor children, would they be offered conditional eligibility? (<i>Yes, No, I don’t know</i>)
9	How do parents with disabilities learn about your policies regarding traveling with their minor children? (<i>We discuss them during the eligibility assessment, We provide a rider’s guide and show parents the relevant policies, We provide a written copy of relevant policies, We inform them that the policies are on our website, Other—please specify other ways parents learn about these policies, I don’t know</i>).

TABLE 1.
List of Survey Questions
(cont.)

10	To what extent do parents with disabilities use your services when traveling with their minor children? (<i>Minimally—less than 1% of our annual ADA paratransit trips, Moderately—1–5% of our annual ADA paratransit trips, A lot—more than 5% of our annual ADA paratransit trips, I don't know</i>).
11	At what age does a non-eligible child pay for a fare to travel with a parent?
12	Do the paratransit and fixed-route bus systems have the same policy regarding the required age at which minor children pay to travel (<i>Yes, No—please describe how they differ, I don't know</i>)
13	What is the maximum number of non-ADA paratransit eligible children who may accompany a parent with a disability on a trip? (<i>One, Greater than one—print the number in the box, We have no limit, I don't know</i>)
14	If a parent with a disability schedules a trip to travel with more than one non-ADA eligible child, can you guarantee space for all the children? (<i>Yes—please describe how you guarantee space for all children who accompany a parent, No, I don't know</i>)
15	What do you think is the biggest challenge your agency faces in accommodating parents with disabilities when scheduling trips with more than one non-ADA eligible child?
16	Have staff reported concerns or worries when parents with disabilities travel with an ADA paratransit eligible child? (<i>Yes—please describe the concerns or worries, No, I don't know</i>)
17	Can parents with disabilities get subscription service to transport their non-ADA eligible children to daycare or school? (<i>Yes, No, I don't know</i>)
18	When parents with disabilities' trips with their non-ADA eligible minor children involve two different destinations, must parents book two separate trips (for example, from home to the child's daycare and an additional ride from daycare to the parent's workplace)? (<i>Yes, No, I don't know</i>)
19	Do drivers receive training on how to install car/booster seats? (<i>Yes, No</i>) Do you think your drivers might receive this training in the future (<i>Yes, No, I don't know</i>)
20	Do you provide car/booster seats for children traveling in your vehicles? (<i>Yes, No, I don't know</i>)
21	How has your agency obtained car/booster seats for your paratransit vehicles? (<i>Purchased them, Developed other resources—for example, a "Loaner Program" with the County Health Department—please describe the resources you use and/or who provides car/booster seats for your vehicles, I don't know</i>)
22.	Can your agency guarantee that a vehicle with car/booster seats will be available at the time a parent with a disability requests a trip? (<i>Yes, No, I don't know</i>)
23	When parents with disabilities provide their own car/booster seats, do drivers assist with the following if parents are unable to do so because of their disabilities? (<i>Carry the car/booster seat to and from a location beyond the curbside, Load it on and off the vehicle, Install it in the vehicle, Place, secure, and remove the child, None of the above, I don't know</i>)
24	What do you think is the biggest challenge your agency faces in having drivers assist parents with disabilities who provide their own car/booster seats?
25a	Does your agency allow parents to stow their car/booster seats in a paratransit vehicle during appointments or while doing errands? (<i>Yes, No, I don't know</i>)
25b	What is the maximum number of car/booster seats that can be stowed?
25c	How do you ensure that the parents' car/booster will be available on their return trips?
26	What do you think is the biggest challenge your agency faces in having parents stow their car/booster seats in a paratransit vehicle?
27	Has your agency experienced barriers/difficulties or challenges not covered in our questionnaire when providing services to <i>parents with disabilities</i> who travel with their minor children? (<i>Yes—please list the barriers/difficulties or challenges, I am not aware of any but will check with other staff, and you may contact me at a later date, No</i>)
28	Are you aware of any staff or Transit Board members' suggestions for improving services to parents with disabilities who travel with their minor children? (<i>Yes—please describe suggestions, I am not aware of any but will check with other staff, and you may contact me at a later date, None</i>)
29	Are you aware of a paratransit agency that offers services beyond ADA minimum requirements to parents with disabilities when traveling with their minor children? (<i>Yes—please provide the paratransit agency's name and describe the service(s) being offered, No</i>)

Additionally, an online rider's guide for every paratransit agency that participated in the study was analyzed for policies affecting travel with a young child. Rider's guides are documents produced by local paratransit agencies that provide detailed information about the agency's policies and procedures (e.g., application procedures, eligibility requirements, hours of services, how to schedule rides, cost to travel, companion policy, riders' rights and responsibilities, etc.).

Procedure

TLG research staff called paratransit agencies targeted for inclusion in the study to obtain the name, phone number, and mailing address of the Paratransit Manager or designee who typically would be responsible for completing questionnaires about the agency's ADA complementary paratransit services. The identified individuals were sent a letter informing them about the research project and inviting them to participate. A research staff member then called potential participants to inquire about their willingness to complete the survey and answer any questions, and then sent a survey to those who agreed to participate. Throughout the data collection period, research staff repeatedly contacted Paratransit Managers who had not completed the survey by sending postcard and email reminders and making follow-up phone calls. Research staff tracked survey receipt and all outreach contact with participants on an Excel spreadsheet. Data collection took place from January 28, 2011, through April 29, 2011. Those who completed the survey were placed in a drawing to receive one of five \$100 Visa gift cards. Survey responses were entered into SPSS version 19 for data cleaning and analysis.

Rider's guides were analyzed to determine what type of information was available to parents about traveling with young children on paratransit. The guides were analyzed for stated policies on fares for children, requirements for car seats (age, height, weight), level of driver assistance with car seats (car seats provided, carried, installed, children secured in seats, car seat storage allowed, etc.), the number of children accompanying an eligible rider, etc. Information from the rider's guides was coded and entered into a matrix in Excel to obtain frequencies for different policies.

Results and Discussion and Observations

A total of 93 (79%) of the 117 transit agencies contacted for participation completed the survey. One agency was excluded because it did not provide ADA complementary paratransit services. Responses were received from agencies in each of the 10 U.S. federal regions and 45 states. Surveys typically were completed by General Managers, Managers, Assistant Managers, and Operations Managers of the overall transit agency or the Paratransit division, Customer Service representatives, and Eligibility Specialists. The average number of self-reported rides provided by paratransit agencies during their last fiscal year was 524,341, with a range of 4,127 to 6,300,000.

Eligibility

Anyone wishing to use local paratransit services is assessed for eligibility by the transit agency to determine whether their disability prevents them from being able to use the fixed-route transit system. Agencies sometimes offer full eligibility (for all trips) or

conditional eligibility (for just some trips). Results from the survey show that agencies differ on whether they offer conditional eligibility for parents who are able to use the fixed-route system when traveling alone but are unable to use fixed-route transit when traveling with a young child. In total, 41% of agencies responded that the assessor would consider the impact of traveling with a child in determining eligibility for paratransit, 37% would not, and 22% did not know. One agency that would consider the impact of the child on the parent's ability to use fixed-route transit explained that when determining eligibility, those who conducted the assessment considered whether the dyad, together as a team, were able to use the fixed-route system as opposed to assessing each individually. The participant explained, "Parents with small children are considered a 'package' during the eligibility process, whether it's the parent that's disabled or the child." Other agencies, however, responded that only a rider's functional abilities should be considered along with assistance provided by their personal care attendant (PCA), whose role is to assist a person with a disability with activities of daily living.

The fact that more than 1/3 of agencies do not offer conditional eligibility for parents who can use the fixed-route when traveling independently but cannot do so when traveling with a young child can result in denying a significant number of parents access to paratransit. Conditional eligibility traditionally has been used to consider how an individual's functioning could be affected by weather conditions (e.g., ice, snow, temperatures), certain times of the day when traveling, specific destinations, or to accommodate episodic disabilities. However, there is some basis for considering how a parent and child's functional abilities work together when determining eligibility. When assessing a child's eligibility for paratransit services, FTA's Office of Civil Rights-funded Topic Guide 3 on ADA Transportation noted that FTA has stated that the "eligibility process can consider the abilities of the 'team' (child and accompanying adult) when determining eligibility" (Golden and Thatcher 2010, 24).

This guidance of allowing for assessment of a parent and child as a "team" was provided in the context of how a parent may be able to assist a child with a disability so the child can ride the fixed-route system with the parent's assistance and, therefore, not be eligible for paratransit services. The same guidance could be applied when assessing a parent with a disability who could not ride the fixed-route system when traveling with a child and, thus, could be determined to be eligible for paratransit services when traveling with the child.

Transit agencies should have a consistent policy for assessing eligibility for children and adults that considers the ability of parents and their children together.

Learning about Policies Regarding Traveling with Children

When asked about all the ways parents learn about policies regarding traveling with their minor child, the most frequently identified means by transit managers was rider's guides, with 62% responding accordingly. As shown in Table 2, additional ways that agencies reported informing riders about these policies were discussing policies during assessment (44%), providing riders with a written copy of policies (40%), informing riders that policies are on the website (33%), and "other means" (23%). The primary "other" means identified was talking with someone in the Customer Service, Eligibility, or Reservations department.

TABLE 2.
How Paratransit Riders Learn about Policies Regarding Traveling with their Minor Children

Ways of Learning about Policies	Yes	No	Don't Know
Discussed during assessment	44% (40)	54% (49)	2% (2)
Provided rider's guide and shown policies	62% (56)	37% (34)	1% (1)
Provided written copy of policies	40% (36)	58% (53)	2% (2)
Informed policies are on website	33% (30)	65% (59)	2% (2)
Other	23% (21)	75% (68)	2% (2)

That 62% of agencies responded that parents learn about policies regarding children from the rider's guide needs further exploration. Our analysis of participating agencies' rider's guides found that few agency guides explicitly discussed policies that are unique to parents. Typically, the guide contained more general information that did not mention parents traveling with their children. As a result, parents with disabilities are left trying to discern what the policy is when traveling with their children or whether the agency might have more flexibility in accommodating a family's transportation needs. Specifically, our analysis found that only 41% of agency guides mentioned child car seats at all. More than 60% (63%) did not specify if car seats would be provided, 90% did not mention whether assistance would be provided in carrying car seats, and 88% did not mention if drivers would help install car seats. If rider's guides are used as a primary source of information, they need to contain policies that apply to parents traveling with children, such as limits on the number of children, payment required for children, age and weight requirements for car seats, whether the agency provides car seats, specifically what assistance will be provided with carrying and installing car seats, and whether car seat storage is available. This information will help parents with trip-planning and provide them with enough information to determine whether paratransit is a realistic option.

Driver Assistance with Packages

As Table 3 shows, 21% of agencies responded that drivers provide no assistance with carrying packages, and just over half (55%) that drivers assist with carrying packages to the door.

TABLE 3.
Driver Assistance Provided to Paratransit Passengers

Type of Driver Assistance	Yes	No	Don't Know	N/A
Carry packages to curb	76% (70)	24% (22)	0	0
Carry packages to door	55% (51)	45% (41)	0	0
Carry packages to other location	2% (2)	98% (90)	0	0
No assistance	21% (19)	79% (73)	0	0
Load car seat	51% (45)	42% (37)	5% (4)	2% (2)
Carry car seat beyond curb	31% (27)	63% (55)	5% (4)	2% (2)
Install car seat	35% (31)	58% (51)	5% (4)	2% (2)
Place, secure, remove child	13% (11)	81% (71)	5% (4)	2% (2)
None	28% (25)	65% (57)	5% (4)	2% (2)

Note: Due to rounding, all percentages may not equal 100%.

Agencies greatly differ in the number of packages that drivers will carry, with some limiting assistance to only one bag and others assisting with up to six. Parents traveling with a young child often need to travel with one or two bags filled with diapers, bottles, snacks, a change of clothes, and toys in addition to a car seat and often a stroller. Therefore, driver assistance with these types of packages can determine whether parents will be able to use paratransit for their transportation needs.

That just over half (55%) of agencies responded that drivers assisted riders by carrying packages to the door is unexpected, since ADA Topic Guide 5 instructs transit agencies to provide door-to-door service when needed by a rider. The guide states, "If a rider needs door-to-door service because of his or her disability and is carrying packages that would be allowable on the fixed route service, then the DOT Origin-to-Destination Guidance would require vehicle operators to carry a limited amount of groceries and other packages, if needed by the rider" (Golden and Thatcher 2010, 13). The DOT (2011) Final Rule on Transportation for Individuals with Disabilities reinforces this guidance by stating that the origin-to-destination guidance stands. The 2015 DOT Final Rule states that agencies will need to make reasonable modifications to policies, practices, and procedures to ensure non-discrimination against people with disabilities and explicitly states that agencies are required to provide origin-to-destination service, which would necessitate their providing door-to-door service if deemed necessary for a passenger to use paratransit. On the other hand, Appendix E of the Final Rule states that if the normal policy for an agency is that drivers are not required to assist with packages, they would not be required to do so if requested by a passenger, as this would modify the services provided by the driver. Nonetheless, if agencies have policies for drivers to assist a rider to the curb with packages, then drivers are required to assist to the door if necessary. Receiving assistance with packages such as diaper bags, strollers, etc. can be particularly important for parents traveling with young children who also have to ensure their child's safety when disembarking from the vehicle to the home.

Driver Assistance with Car Seats and Car Seat Storage

Only 12% of agencies provide car/booster seats for their paratransit passengers, and an even lower percentage (7%) guarantee their availability for rides if requested. Moreover, as Table 3 shows, just over half (51%) of agencies assist with loading and unloading car/booster seats, only 35% assist with installation, and fewer than one third (31%) carry car seats from a location beyond the curb. Even fewer agencies (13%) place, secure, and remove children into and out of car/booster seats.

Also, only 3% of responding agencies allow riders to stow a car/booster seat on the vehicle once a passenger arrives at their destination. Reasons for not allowing car/booster seat storage on vehicles include ensuring safety for all passengers, providing flexibility for any vehicle to pick up any passenger for a return trip without needing to coordinate the transfer of a car seat, and guarding against liability issues for lost, stolen, or damaged items left in vehicles. These policies generally necessitate parents traveling with small children to bring their own car/booster seat, carry the seat from their homes to the vehicle while managing a small child, install the car/booster seat in the vehicle

while maintaining the safety of the child, and then bring the car/booster seat along with them once at their destination.

FTA has found that not providing assistance with car/booster seats violates the standard of “reasonable access.” A 2008 *Transit Access Report* contains a Letter of Finding (LOF) from FTA resulting from a complaint investigation against Maryland Transit Administration (MTA) for not loading a car seat on a paratransit vehicle and not securing a child in the car seat (Transit Access Report 2008). The LOF instructed MTA to accommodate a parent needing assistance with securing a car seat and transferring the child into and out of the seat. FTA interpreted MTA’s policy as counter to ADA regulations (Code of Federal Regulations, title 49, sec. 37.123 (f) (1) and (2)) that require companions to be provided with service. FTA reasoned that since state law requires children to be secured in a car seat, the agency would be responsible for taking steps needed to transport the companion legally. Additionally, FTA applied Department of Justice (DOJ) requirements regarding program accessibility and reasonable access that state that a public entity should alter its policies to make services accessible unless alterations would result in modifying the nature of the services (Code of Federal Regulations, title 28, sec. 35.130 (b) (7)). Reasonable modification has been explained by FTA Office of Civil Rights Officers Clark and Klein (2009) as modification that is “necessary for the rider to use the service, because of the rider’s disability,” is reasonable, and does not “constitute a fundamental alteration or direct threat” (p. 4). There was ambiguity as to whether paratransit agencies were subject to the reasonable modification provisions. Rulings by the Fifth Circuit (*Melton v. Dallas Area Rapid Transit (DART)* 2004), Ninth Circuit (*Boose v. Tri-County Metropolitan Transportation District of Oregon* 2009) and, most recently, the Second Circuit (*Abrahams v. MTA Long Island Bus* and *Cruz v. Nassau County* 2011) have interpreted the reasonable modification stipulation as not applying to transportation. However, as previously mentioned, the DOT Final Rule (2015) clearly states that transportation agencies are required to modify policies, practices, and procedures to ensure accessibility.

In our data, looking at agency responses about loading car/booster seats into and out of vehicles and carrying packages to the curb, an interesting distinction emerged. Although 76% of agencies answered that drivers would carry packages to the curb, just 51% answered that drivers would load car/booster seats onto and off the vehicle, essentially the same task. That a much smaller percentage of agencies would carry car/booster seats than an unspecified package shows an inconsistency. Agencies should have consistent policies for assistance with packages, regardless of the specific item to be carried, within the same weight limits.

Probably the best solution for agencies to address the challenge of young children needing to ride in a car/booster seat is to purchase vehicles with integrated car seats. As agencies purchase new vehicles to replace aging paratransit fleets, they can consider buying vehicles with integrated car seats that can be used by children that are over 20 pounds and at least 1 year old. Such seats will eliminate the need for drivers to load, install, and carry car seats and also help ensure the safety of children riding on paratransit vehicles by eliminating installation errors. Alternatively, transit agencies could explore the feasibility of providing car seats for rides taken in their vehicles, if

requested in advance. If neither of these solutions is workable, agencies could commit to providing driver assistance and find a way to store car seats on the vehicle during appointments, such as in rooftop storage containers or roof racks. Providing storage for car seats would most likely necessitate scheduling considerations so the same vehicle is used to drop off and pick up a passenger. Although scheduling could be a real challenge, agencies could work with riders to identify solutions so parents can travel with children who must ride in car seats.

Limit on Companions

As Table 4 shows, 18% of agencies responded that a maximum of one child could accompany an eligible rider, 19% responded that more than one child could accompany an eligible rider, 8% did not know, and 55% responded that there was no specific limit on the number of children who could accompany an eligible rider. However, when agencies that responded that they could accommodate more than one child or did not have limits on the number of children were asked if they could guarantee space for more than one child, 45% could not, 51% could, and 4% did not know.

TABLE 4.
Parents with Disabilities
Traveling with their Minor
Children

Maximum number of minor children who can accompany a parent?	
1	18% (16)
>1	19% (17)
No limit	55% (48)
Don't know	8% (7)
Guarantee space for more than one child?	
Yes	51% (35)
No	45% (31)
Don't know	4% (3)

Space constraints were the most frequently listed challenge of accommodating multiple children. Other common challenges were issues with car seats, lack of supervision of children by parents, and children needing assistance from drivers. However, nearly 30% of agencies responded that they do not face any problems in accommodating multiple children accompanying an eligible parent.

Limiting the number of children who could accompany a parent or not guaranteeing space for more than one companion is a common practice that is a barrier to parents with more than one child. If a rider wants to travel with more than one companion, the individual typically is required to call the agency on the day of a trip to determine whether there is space. Needing to verify space availability for more than one companion on the same day as the ride can be particularly problematic for parents needing to transport children to appointments and can result in parents paying cancellation fees for missed appointments if space is not available. We recommend allowing riders to reserve space for all companions at the time a ride is scheduled. If this is not feasible for a system during peak hours when there is high demand by eligible riders, perhaps agencies could allow passengers to reserve space for all companions at the time of reservation for rides taken during non-peak times.

Subscription Service and Chain Trips

Subscription services are offered by many agencies to allow passengers to have a standing appointment for a ride regularly taken on the same day and time each week. Having subscription service prevents riders from needing to call and schedule appointments each week. A total of 69% of paratransit agencies reported that parents can get subscription service to transport children to day care or school. However, several agencies noted that this service depends on whether the agency is over capacity for its subscription services, as federal regulations stipulate that subscription service should not comprise more than half of the trips available at a given time (Code of Federal Regulations, title 49, sec. 37.133 (b)). Furthermore, a few agencies explained that even if parents had subscription service, the parent would need to disembark with the child at school and wait for another ride to continue on to work or return home. Just 5% of agencies are able to perform a 10-minute “scheduled wait.” Therefore, most agencies would require that the parent schedule another ride from the child’s daycare or school. One agency noted that the return ride would be at least 30 minutes later; another responded that it would be at least 90 minutes later.

That 69% of agencies responded that parents could get subscription service to transport their child to daycare or school is somewhat misleading, as 91% of agencies do not provide a “scheduled wait.” Although time constraints would definitely be a consideration for paratransit agencies in establishing the day’s manifest to ensure that all riders are picked up within the required pickup window, transit agencies could explore the feasibility of instituting scheduled waits. Those agencies wishing to institute scheduled waits could check with other agencies that do allow for chain trips about the economic impact and efficiency while also taking into consideration the unique constraints of their own system.

Age Children Pay to Ride

More than three quarters (78%) of paratransit agencies responded that the agency begins charging children at the same age as the fixed-route system, with 95% charging children age 7 and over; 20% of agencies charging children from birth, and nearly all charging children ages 7 years and older.

Because paratransit agencies are authorized to charge twice the fixed-route fare (Code of Federal Regulations, title 49, sec. 37.131(c)), costs for regularly riding paratransit can add up quickly, particularly for parents with multiple children. Cost can be a real barrier for parents with disabilities, as their median annual family income was found to be \$35,000 compared to \$65,000 for parents without disabilities in the 2008–2009 American Community Survey (Kaye 2012). Paratransit costs also can quickly escalate for riders who are unable to make chain trips such as for drop-offs, since each leg of a trip is charged separately. One gets a sense of how expensive paratransit is for a parent traveling with a child by estimating the daily cost of dropping of a child at child care and then continuing to the parent’s work. Using the fare of \$2.09, which was the average fare in 2010 according to a U.S. Government Accountability Office (GAO) survey (2012), a parent would need to pay \$12.54 per day to travel with his/her child to school, pay for a separate trip to work, and then reverse these legs of the trip at the end of day. Keep in

mind that this example trip involved only one child and did not include any additional stops such as stopping for groceries. Agencies could examine whether offering family rates would be possible or charge children only at the age that the fixed-route system charges them. Transit agencies have explored offering free fares to older adults in the Chicago metropolitan area (Metaxatos 2013) and eliminating fares for older adults in the state of Illinois (Metaxatos and Dirks 2012). Similar analyses could be undertaken to examine reduced fares for parents traveling with children, which would be a much smaller segment of the paratransit riding population than older adults and, therefore, not nearly as costly of a group to accommodate.

Same-Day Rides

The majority of paratransit agencies (58%) do not offer same-day rides. Many of the agencies that do noted that same-day rides often are based on availability and for emergency situations.

Same-day rides can be particularly important for parents who may need to get medical attention for their children, pick children up from school if children get sick, or meet some other unanticipated immediate need. Agencies that currently do not offer same-day rides could consider providing this service if space is available, for emergency- or health-related reasons. This would be helpful for all riders in communities that do not have accessible taxi service.

Parent Use of Service

Paratransit agencies perceive that parents with disabilities traveling with their minor children constitute a small percentage of riders. More than half of participating agencies (54%) responded that parents riding with their minor children used the service minimally (less than 1% of their ridership), 12% indicated that parents used the service moderately (1–5% of their ridership), just over 1% indicated that parents used the service a lot (more than 5% of their ridership), and 33% did not know how much parents used the service.

Paratransit providers perceive that parents with disabilities comprise a small percentage of their overall ridership, with more than half of agencies estimating that they comprise less than 1% of their ridership. Although outside the scope of the present study, determining if these numbers reflect the actual ridership of parents would be informative and, if so, also important would be determining how parents meet their family's transportation needs, particularly those who do not have their own vehicles. Also noteworthy is the fact that more than 33% of agencies did not know what percent of the riders were parents, suggesting that many agencies do not ask or track such information.

Limitations of the Current Study

There are limitations of this study that must be considered when interpreting the findings. Paratransit agencies were not randomly selected for participation; the sample was a convenience sample of agencies having completed prior surveys and agencies recognized for engaging in innovative practices. Because agencies were not randomly

selected, findings may not be reflective of paratransit policies in other agencies not included for participation.

This research was focused exclusively on ADA complementary paratransit and, therefore, did not address the transportation challenges faced by parents with disabilities living in very rural areas that do not have this service. This is a significant limitation, since the Research and Training Center on Disability in Rural Communities notes that 21% of the population in the United States lives in rural areas and nearly 11 million have disabilities (Enders 2005). Clearly, people with disabilities who live in rural areas constitute a large proportion of the population, and because many very rural areas do not have regular fixed route transportation, these individuals face particularly difficult transportation challenges. Future research is needed that specifically addresses the transportation needs of parents with disabilities living in rural areas, as these parents may experience some of the most significant transportation barriers.

Finally, because paratransit managers completed the survey rather than drivers, responses may better reflect policy rather than actual practice. Future studies with drivers might provide a more accurate understanding of assistance actually provided to parents traveling with their children.

Nonetheless, findings from this study can be used by paratransit agencies to enhance services for parents with disabilities. Results suggest that for some policies, minor modifications could greatly facilitate the ability of parents to access paratransit services. Further, the data indicate that agencies are already informally accommodating some of these needs. In fact, some of the recommendations provided would simply involve agencies codifying steps they are already taking to best serve parents or making minor adjustments to current policies. Such adjustments include having drivers provide assistance with car seats and accommodating parents who travel with more than one child. Admittedly, some recommendations will result in transit agencies incurring additional expenses. Agencies can look to make changes incrementally, starting with those that do not entail additional expenses (such as obtaining information about parental status at intake and updating rider's guides) while beginning to identify funding sources in the most recent federal transportation authorization, Moving Ahead for Progress in the 21st Century (MAP-21). For example, the Enhanced Mobility of Seniors and Individuals with Disabilities (5310) Program could help offset costs for implementing other changes beyond ADA requirements (such as providing scheduled waits, supplying car seats, or accommodating storage of car seats, allowing multiple children to ride with parents, or offering reduced rate family fares). Agencies can explore the use of volunteers to provide premium services beyond ADA requirements (same-day rides, outside-of-area rides, extended hours, etc.). Additionally, in some regions, agencies also could look to collaborate with other entities such as social service providers, employers, childcare programs, job training programs, and colleges and universities. Although such collaborations can be challenging, some research suggests these models can improve access for those most reliant on public transportation (Blumenberg 2002). Following are recommendations for agencies to consider implementing that may be particularly helpful to parents with young children.

Recommendations

1. Identify paratransit riders who are parents with disabilities. Paratransit agencies should collect data on the parental status of their riders and inquire whether riders plan to use paratransit with their children, and if so, determine the children's ages. These data should be collected at the time of initial application for services.
2. Consider the functional abilities of a parent and child together when assessing eligibility.
3. Provide all riders with detailed information about policies impacting riding paratransit with children.
4. Accommodate riders traveling with small children who are required to ride in car seats.
5. Revise policies to facilitate use of paratransit by parents with disabilities such as:
 - Providing riders with door-to-door service when necessary.
 - Establishing "family-friendly" companion policies that allow family units to book rides to travel together as families can on fixed-route transit systems.
 - Providing discounts for young children traveling with their parents—start charging children only at the age the fixed-route system does and establish reduced family rates.
 - Offering chain-trips so riders can use paratransit for serial rides such as for transporting children to daycare and then continuing on to work.
 - Offering same-day rides for emergency situations and urgent medical appointments.
6. Think creatively about ways to improve services to parents. Traveling with small children can be challenging. Innovative paratransit systems have successfully found ways to make the process easier for parents and other riders. Strategies include improving scheduling to reduce travel times and limit the number of stops on rides, charging premium fares to offer services beyond ADA requirements (same-day rides, out-of-area rides, after-hour rides, etc.), and developing volunteer programs and collaborating with other entities to fill in gaps between ADA requirements and riders' needs.

As people with disabilities are increasingly becoming parents, transit systems should establish policies to address their needs and ensure their ability to freely access transportation services.

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