

1999 CPTC ANNUAL REPORT AND RECOMMENDATIONS

11. THE COMMISSION RECOMMENDS THAT CONNDOT AUTHORIZE CONNECTICUT TRANSIT AND OTHER STATE SUBSIDIZED BUS OPERATORS TO ACCEPT AN ADA CERTIFICATION CARD IN COMBINATION WITH A PICTURE-BEARING IDENTIFICATION CARD AS ADEQUATE PROOF OF QUALIFICATION FOR A DISABILITY REDUCED FARE.

DEPARTMENT RESPONSE:

Several factual errors and misunderstandings are evident in this recommendation. First, individuals who are certified to use ADA complementary paratransit are by definition unable to use conventional fixed-route transit. Some exceptions exist – for example, for several years, at CDOT’s initiative, The Kennedy Center has provided travel training to enable some ADA paratransit users to ride independently on regular transit buses. Individuals who volunteered for travel training under this program were assured their certification to use ADA paratransit would not be forfeited. Also, under a separate CDOT initiative, The Kennedy Center has been engaged to perform the recertification of ADA paratransit users and to establish uniform statewide certification criteria. One result of this effort may be to establish “conditional certifications” for some persons with disabilities that permit them to use ADA paratransit only under certain circumstances or only for certain trips. Otherwise, however, a requirement that fixed-route transit operators accept the ADA certification card as proper identification to qualify for reduced fares flies in the face of the general principle that individuals qualify to use ADA paratransit because they *cannot* use fixed-route buses in the first place.

It is not correct that the Elderly & Disabled I.D. Card “requires...a trip to Connecticut Transit to get the photo taken and card issued.” In fact, almost all cards are now processed entirely by mail, with the applicant submitting a photograph with his or her application. Also, federal regulations require transit systems to accept Medicare cards as identification to qualify for reduced fares. As such, the Elderly & Disabled I.D. Card application form emphasizes that persons with Medicare cards do not need any separate identification to ride at half fare. All, or almost all, ADA paratransit users who are over age 65 already do have the Medicare card.

CDOT established the single, statewide Elderly & Disabled I.D. Card in order to simplify compliance by bus operators with the half-fare policy. Requiring operators to recognize and accept the ADA certification card, *plus requiring the customer to present some other, separate picture I.D.*, would greatly complicate the process.

In effect, this recommendation will potentially benefit only someone who: (a) Is properly able to hold an ADA paratransit certification and still use regular fixed-route transit, and (b) Does not have a Medicare card. As a practical matter, most certified

DEPARTMENT RESPONSE: (#11 cont.)

ADA paratransit users will never need to use their I.D. to ride a fixed-transit bus, and many ADA paratransit users do have Medicare cards.

As noted above, there may be a number of individuals who receive conditional certifications to use ADA paratransit and thus can use regular buses for other trips. We could certainly consider ways to coordinate administration so that one doctor's certification is sufficient to support the issuance of both I.D. cards. Also, the \$5.00 fee charged for issuing the Elderly & Disabled I.D. card was set at CDOT's direction. CDOT may consider changing the policy at some future date so that the fee is waived for individuals with disabilities who do *not* have a Medicare card or individuals with conditional certifications to use ADA paratransit.