# **Transportation Program Guidance**

The purpose of this guidance is to assist local Area Agencies on Aging - AAA in evaluating transportation contracting requirements in their local areas.

Included within these transportation program guidelines is Attachment I: Vulnerability criteria, Senior Citizens Services Act - SCSA eligibility requirements, Title III of the Older Americans Act - OAA eligibility requirements, and the contribution policy.

# Statutory Authority

- <u>Title 480-30 WAC</u> Utilities and Transportation Commission
- <u>Title 480-31 WAC</u> Utilities and Transportation Commission
- <u>Title 81 RCW</u> Transportation
- WAC 388-106-1110 Senior Citizens Services Act SCSA
- Title III of the Older Americans Act OAA
- Americans with Disabilities Act

For more information regarding the ADA and transportation go to the Department of Justice website: https://www.ada.gov

The Administration on Aging (AoA) Senior Transportation Resources, "Seniors Benefit from Transportation Partnerships: Promising Practices from the Aging Network," is a helpful resource. This is a toolbox of technical assistance materials developed to increase the provision and coordination of transportation services for older Americans. The toolbox contains useful practices in transportation coordination, a handbook for creating door-to-door transportation programs, a template for communities to build their own transportation resource guide, a comprehensive resource list for transportation coordination and a presentation on useful practices that can be tailored for different audiences.

# **Transportation Guidance**

#### 1. PROGRAM DEFINITIONS

- a. Transportation Services Services designed to transport older persons to and from medical and health care services, social services, meal programs, senior centers, shopping and recreational activities so such service will be accessible to eligible individuals who have no other means of transportation or are unable to use existing transportation. Personal assistance for those with limited physical mobility may be provided.
- b. Available Funding Title III of the Older Americans Act and/or the Senior Citizens Services Act SCSA may fund this program. For either funding source, the only eligibility requirement is age 60 or over. Refer to the contribution policy in Attachment I for both funding sources.

- c. Regular Specialized Transportation The transportation of passengers using provider-owned vehicles utilizing special equipment when required or necessary to accommodate those with limited physical mobility. Drivers are usually paid, but volunteer drivers may also be utilized.
- d. Volunteer Transportation The transportation of passengers using privately owned vehicles. Drivers are volunteers, generally reimbursed for expenses incurred. These services may be used along with or as an alternative to regular specialized transportation.
- e. Target Population The target population for transportation services is persons age 60 and over who:
- i.Need transportation to medical and health care services, social services, meal programs, senior centers, shopping and recreational activities; and

ii.Cannot manage their own transportation because:

- A. They do not have a car; or
- B. They cannot drive; or
- C. They cannot afford to drive; and
- D. They cannot use public transportation; or
- E. Public transportation is not available or accessible.

All persons served should be members of the target population. To the degree feasible, persons served should meet the vulnerability criteria listed in Attachment I.

# 2. INSURANCE FOR PROFIT, NON-PROFIT AND VOLUNTEERS

a. Coverage – For-profit Motor Companies must meet the requirements described in the Washington Utilities and Transportation Commission - WUTC <u>WAC 480-30</u>. Private not-for-profit transportation providers must meet the requirements described in WUTC <u>WAC 480-31</u>. A company authorized to write such insurance in the state of Washington must have written the insurance or surety bond. The combined bodily injury and property damage liability insurance or surety bond must not be less than the following:

i.For Profit Motor Companies

- A. Passenger seating capacity of 15 or less (including driver) \$1,500,000 combined single limit coverage.
- B. Passenger seating of 16 or more (including driver) \$5,000,000 combined single limit coverage.

ii. Private Non-Profit Transportation Providers

A. Passenger seating capacity of 15 or less (including driver) - \$500,000 combined single limit coverage.

B. Passenger seating capacity of 16 or more (including driver) - \$1,000,000 combined single limit coverage.

#### iii.Volunteers

Each agency provider of volunteer services is recommended to carry the same amount of insurance as recommended for providers of Regular Specialized Transportation Services. Individual volunteer drivers are required to carry the state mandatory minimum amounts of insurance for private vehicles.

The Washington State Insurance Commissioners fact sheet on Mandatory Auto Insurance.

#### 3. DRIVERS – PAID AND VOLUNTEER

- a. Transportation providers should assure that paid vehicle drivers are reliable and able to drive safely. In addition to the general personnel selection procedures of the organization, selection of paid vehicle drivers should include verification that the applicant:
- i. Has an appropriate and valid Washington State driver's license. State law requires a commercial driver's license for those driving a vehicle with a capacity of 16 or more.
- ii. Has had no moving traffic violations and has not been involved in any at-fault accidents within the past two years.
- iii.ls physically capable of safely driving the program vehicles. This verification should be in the form of a written medical statement. If such a statement is not available, some other form of creditable verification should be provided.
- iv. Has no previous record of adult or child abuse through the Washington State Patrol criminal identification section.
  - b. Transportation providers should assure that volunteer vehicle drivers are reliable and able to drive safely. Selection of volunteer vehicle drivers should include verification that:
- i.The applicant has an appropriate and valid Washington State driver's license. State law requires a commercial driver's license for those driving a vehicle with a capacity of 16 or more.
- ii. The applicant has had no moving traffic violations and has not been involved in any at-fault accidents within the past two years.
- iii. The applicant is physically capable of safely driving the program vehicles. This verification should be in the form of a written medical statement. If such a statement is not available, some other form of creditable verification should be provided.
- iv. The applicant has no previous record of adult or child abuse through the Washington State Patrol criminal identification section.
- v.The volunteer(s) are willing to maintain records and accept record and deposit client donations in an atmosphere that protects the client's right to confidentiality.

Please refer to Volunteers Drivers – A Guide to Best Practices for insurance, risk, driver conduct, background checks, training and other issues related to volunteer transportation

issues: https://www.ctanw.org/volunteer-drivers-manual

#### 3. TRAINING GUIDELINES

- a. Paid drivers Transportation providers should assure that paid vehicle drivers are trained adequately and are able to safely use all associated equipment through a formal training plan. Providers should maintain records for all drivers to verify that training has been received. The training plan should include at least the following components:
- i. New drivers should be fully briefed about the transportation program, reporting forms, vehicle operation and the geographic area in which they will operate their vehicles.
- ii. Within the first six months of employment, drivers should successfully complete the National Red Cross course in first aid training, including training in the use of cardiopulmonary resuscitation CPR techniques. Other courses that provide equivalent training can be substituted with approval of the Area Agency on Aging AAA. Drivers on an annual basis should complete refresher courses. Any alternative policies and procedures regarding emergency situations and required training for drivers can be reviewed and approved by the area agency.
- iii. Within the first six months of employment, drivers should complete a defensive driving course.
- iv. Within the first six months of employment, drivers should be provided training that will assist them in better serving the targeted population group within the provider's service area. Passenger assistance training such as ADAPT or PAT could be given directly by the provider or through other training resources available within the community with approval of the AAA. The targeted population they may be serving could include people with disabilities and people who have limited English proficiency.
- v.Drivers should be made aware of changes in the transportation program, reporting forms and vehicle operation through regular dissemination of such information in a formal verifiable manner (i.e. email, bulletin boards, newsletters, safety meetings, etc.)

### b. Volunteer drivers

- i.Training of volunteer drivers should include orientation to the sponsoring agency and the purpose of the program, role of volunteers, rights and responsibilities, reimbursement, reporting requirements and evaluation. On-going in-service training should be provided to volunteers as opportunities arise and should be coordinated with other community programs to increase the volunteer's knowledge of services available for older persons in the community.
- ii. Volunteer drivers should have defensive driving training and passenger assistance and sensitivity training within the first sixty days following the initial driving assignment. First Aid and CPR training is optional, depending on the sponsoring agency's policy on the issue.

#### 4. DRIVER EVALUATION – PAID AND VOLUNTEER

a. The provider should evaluate each driver's performance on a semi-annual basis, which would include on-board evaluation of actual practice and general knowledge of the job. The results of these semi-annual evaluations should be documented.

- b. At least annually, each driver should have all of their job application information updated so that any changes in their status, which affect their ability to perform as a driver, would be noted. At the same time, their performance and job responsibilities should be reviewed.
- c. The provider should investigate any accident involving a driver's agency-sponsored activities immediately. A report of the accident should be placed in the driver's personnel file.

#### 5. MAINTENANCE RECOMMENDATIONS

- a. Prevention The transportation provider should develop and implement a preventive maintenance program that adequately addresses all of the maintenance needs of vehicles and related equipment, utilizing, at a minimum, the maintenance schedule provided by the vehicle manufacturer.
- b. Documentation There should be a system in place to document the time and circumstances of all maintenance services received by each vehicle and related equipment. Vehicle servicing should be based upon the preventive maintenance schedule.
- c. For profit and non-profit agency vehicles should meet ADA vehicle accessibility requirements and keep ADA equipment maintained.
- d. Personally owned vehicles POV must be maintained under state law minimum requirements. Volunteers are responsible for maintaining their own vehicles.

### 6. REFERRAL TO INFORMATION AND ASSISTANCE/CASE MANAGEMENT - I&A/CM

a. Subject to client consent, all clients who appear to meet the vulnerability criteria listed in Attachment I should be referred to the I&A component of the I&A/CM program for screening to determine the need for case management.

#### Attachment I

## **Vulnerability Criteria**

A person is considered vulnerable if he/she meets the following criteria:

- 1. Is unable to perform one or more of the activities of daily living listed below without assistance due to physical, cognitive, emotional, psychological or social impairment:
  - Ambulation;
  - Bathing;
  - Cooking;
  - Dressing or undressing;
  - Eating;
  - Housework;
  - Laundry;

- Managing medical treatments (prescribed exercises, change of dressings, injections, etc.);
- Managing medications (what to take, when to take, how to store properly, etc.);
- Managing money (budgeting, check writing, etc.);
- Personal hygiene and grooming;
- Shopping;
- Using the telephone;
- Toileting;
- Transferring (getting in and out of bed/wheelchair);
- Transportation; or
- 2. Has behavioral or mental health problems that could result in premature institutionalization or is unable to provide for his/her own health and safety primarily due to cognitive, behavioral, psychological/emotional conditions which inhibit decision-making and threaten the ability to remain independent. AND
- 3. Lacks an informal support system: Has no family, friends, neighbors or others who are both willing and able to perform the service(s) needed or the informal support system needs to be temporarily or permanently supplemented

SCSA ELIGIBILITY REQUIREMENTS - Age 65 or older; or 60 or older and either unemployed or working 20 hours per week or less. The application form for SCSA funding is <u>DSHS 14-155</u>.

OAA ELIGIBILITY REQUIREMENTS - Age 60 or over.

#### **Contribution Policy**

Persons who receive services funded by Title III of the Older Americans Act must be given a free and voluntary opportunity to contribute to the cost of services provided. The same opportunity must be extended to persons who receive an SCSA-funded service, which is not subject to a means test. The service provider must protect each person's privacy with respect to his/her contribution, establish procedures to safeguard and account for all contributions made by users of the service and use all such contributions to expand the service for which the contribution was received.

The service provider may develop a suggested contribution schedule. If a schedule is developed, the provider must consider the income ranges of older persons in the community and the provider's other sources of income. No otherwise eligible person may be denied service because he/she will not or cannot contribute to the cost of the service.