Date: November 1, 2010

To: GCT Board of Directors

From: Helene Buchman
      Acting Director of Planning and Marketing

Subject: Consider Adoption of a Minimum Age or Height to Ride GCT Fixed Route Transit and GCT ACCESS Unaccompanied by a Responsible Person

I. EXECUTIVE SUMMARY

The Ventura County Transportation Commission (VCTC) Transit Operators Advisory Committee (TRANSCOM) is comprised of transit operators throughout Ventura County. Earlier this year, the TRANSCOM ADA Task Force was tasked to review issues surrounding young children riding both fixed route transit and disabled paratransit service unaccompanied by a responsible person. At its June, 2010 meeting, the ADA Task Force recommended that the TRANSCOM members adopt a policy to establish a minimum age for unaccompanied children to ride public transit. After much discussion, the members agreed to recommend the minimum age of six (6) years for children to ride unaccompanied. TRANSCOM members further recommended that transit operators with existing minimum criteria would continue to be able to use already adopted criteria. This would enable GCT to utilize either our 45" height criteria or the minimum age, whichever is most practical in a particular situation.

It is recommended that the GCT Board of Directors adopt a minimum age of six (6) years or 45" height requirement to ride both GCT fixed route service and GCT ACCESS unaccompanied by a responsible person. GCT employees may use whichever is more practical in a particular situation.
II. BACKGROUND

Earlier this year, a request was made to the VCTC to provide disabled certification for a four-year old child to use any paratransit service in the County unaccompanied by an adult. While the wisdom of allowing a young child to ride any transit service without adult supervision was being debated, the VCTC ADA Task Force consulted transit providers in the county and found that none had a prohibition against a child of any age riding unaccompanied. GCT's current height restriction of 45" has been the only adopted criteria among the providers. This has only applied to the fare payment requirement and is not age-sensitive.

The discussion brought out several issues to be addressed:

- Is there a particular age at which children are more or less aware of their surroundings and the safety of where they are?
- What should the relationship be between disabled paratransit eligibility of a child and the use of fixed route transit?
- How would age criteria be enforced by drivers and/or the agencies in general?
- Is it possible for one minimum age to be adopted by all transit providers in the County so that seamless service could be maintained?
- If all transit operators in Ventura County adopt a minimum age for riding fixed route and disabled paratransit unaccompanied by an adult, what would that mean for GCT's minimum height policy?

Some guidance on this has been provided by the Easter Seals in reference to disabled eligibility:

- Whether the trips would be disabled paratransit eligible depends on minimum age policies that the transit agency has for use of the fixed route service. If the transit agency does not have a minimum age policy - below which children using the fixed route system must be accompanied by a parent or guardian, then the disabled paratransit eligibility process would have to consider the child independent and evaluate his/her ability to use fixed route system. If the policy for the use of fixed route system is that children under a certain age must be accompanied by an adult, then the disabled paratransit eligibility process would consider whether the child with the assistance of an adult would be able to use the fixed route system. It is possible that there may still be some level of eligibility,
but it is likely that the child with an adult would be able to use fixed route service more often. It is also likely that the child would have at least conditional disabled paratransit eligibility.

- The disabled paratransit eligibility process can consider the abilities of the "team" (child and accompanying adult) when determining eligibility because the child would also be required to be accompanied by an adult when using fixed route service. In most cases, the disability regulations do not allow transit systems to require that riders be accompanied by attendants, but in the case of a child's eligibility, the attendant is being required because of age not disability.

After referring to the Easter Seals' guidelines for considering age as a factor in ADA certification, TRANSCOM members agreed that similar considerations apply to a child's ability to utilize fixed route transit safely and independently. The TRANSCOM members came to consensus on asking each transit and paratransit provider to adopt a common minimum age for riding unaccompanied by an adult. TRANSCOM proposed that the minimum age be six (6) years old. It was further agreed that GCT would continue its existing height criteria of 45" and that we would apply either the minimum age or the height restriction, depending upon the circumstance.

III. SUMMARY AND RECOMMENDATIONS

It is recommended that the GCT Board of Directors adopt a minimum age of six (6) years or 45" height requirement to ride both GCT fixed route service and GCT ACCESS unaccompanied by a responsible person. GCT employees may use whichever is more practical in a particular situation.

[Signature]
General Manager's Concurrence