

## **Summary of fixed hours approach with a Comparison of Bay Area Paratransit Providers**

The agenda planning request also noted that some Bay Area transit agencies appear to have fixed paratransit operating times. Upon closer examination, staff found that these agencies are not actually using a fixed paratransit operating time and instead use fixed hours as a way of simplifying the ADA Comparability Rule for their riders so as not to violate federal law because:

1. They mirror the Core Fixed-Route Schedule just like East Bay Paratransit (The Comparability Rule). For agencies like SamTrans and VTA, their major bus lines (such as the ECR in San Mateo or the Light Rail in San Jose) operate roughly from 5:00 AM to midnight. By advertising 5:00 AM – 12:00 AM, the agency is indicating a broad time frame, making the longest period their primary system is operational.

2. Service is still route-specific just like East Bay Paratransit. Even if SamTrans says they run until midnight, you still can't get a paratransit ride to a remote neighborhood at 11:30 PM if the only bus to that neighborhood stopped running at 7:00 PM.

- The fixed hours are the outer limits of the service.
- Your specific trip is only legal under the ADA if a bus is running that same route at that same time.

3. Agencies can exceed the Law. Federal law sets the minimum requirements. An agency is allowed to be more generous than the law requires.

- SamTrans, for example, explicitly states they provide service beyond what is required by the ADA.
- If an agency wants to offer a flat 5:00 AM – midnight window regardless of which specific bus lines are running, they are allowed to do so as a premium or local policy, provided they still meet the ADA minimums everywhere else.

The table below summarizes the reasons these other transit agencies can use those specific time windows.

Agency	Stated Window	Why it complies with Federal Law
SamTrans	5:30 AM – 12:00 AM	Matches their "Bayside" core bus service; they also offer <a href="#">limited 24-hour service</a> in some areas.
County Connection	4:30 AM – 11:00 PM	Matches their weekday bus schedules; they extend to <a href="#">midnight for BART-related trips</a> .
VTA	~5:00 AM – 12:00 AM	Matches VTA Light Rail and <a href="#">Rapid bus hours</a> .
East Bay Paratransit	Variable	Because it covers two massive systems (AC Transit & BART), a single fixed window would be confusing. Instead, EBP prefers to say they match the bus/train because those schedules vary significantly from Pinole to Fremont.