

Via Wheelchair Accessible Vehicle (WAV) Service Equivalency Methodology

Purpose

To ensure compliance with the Federal Transit Administration (FTA) and the Americans with Disabilities Act (ADA), we evaluate whether riders requesting wheelchair accessible vehicles (WAVs) receive service that is equivalent to riders who do not require accessible vehicles.

Historically, equivalency was measured using simple averages (e.g., raw “seat unavailable” rates and average wait times). While those comparisons are directionally useful, results can be skewed by both smaller sample size of WAV riders as well as variables that differ between WAV & non-WAV populations and have a high impact on service levels (e.g., trip length, time of day that may or may not be “equivalent” between the two populations).

Our updated methodology uses a structured statistical approach to provide a more accurate and defensible assessment of service equivalency, while considering these other impactful variables - a more true, equivalent “apples to apples” comparison.

ADA Framework

Under the ADA, riders with disabilities must receive equivalent service, including:

- Comparable wait times
- Equal pricing
- Service to the same geographic areas
- Same hours of operation
- Equal availability of rides

Our analysis focuses primarily on **ride availability** and **wait times**. Via services meet criteria for equal pricing, geographic area, and hours of operation based on service setup and alignment with the transit agency partner.

Methodology Overview

We evaluate whether being a WAV rider, in and of itself, affects the likelihood of receiving service or experiencing longer wait times.

Rather than comparing raw averages, we use a statistical model that accounts for and holds equal operational factors that influence service outcomes, including:

- Time of request (e.g., peak vs. off-peak)
- Day of request (weekday vs. weekend)
- Trip origin
- Trip distance
- Number of passengers
- System-wide vehicle availability at the time of request

This allows for an “apples-to-apples” comparison between WAV and non-WAV riders.

After accounting for these factors, does requesting a WAV:

1. Increase the likelihood of a “seat unavailable” outcome?
2. Increase expected wait time?

If not, service is considered equivalent.

Measures of Equivalency

1. Ride Availability (“Seat Unavailable” Rate)

We assess whether WAV riders are statistically more likely to experience a “seat unavailable” outcome compared to non-WAV riders.

Service is considered equivalent when:

- There is no statistically significant difference in availability between WAV and non-WAV riders; or
- WAV riders are not at a disadvantage relative to non-WAV riders.

This ensures that any observed differences are not simply the result of trip patterns, peak demand, or other operational dynamics.

2. Wait Time (ETA)

We assess whether WAV riders experience longer estimated arrival times (ETAs) than non-WAV riders, controlling for the same operational factors.

Service is considered equivalent when:

- There is no statistically significant difference in wait times; or

- Any observed difference falls within a reasonable operational threshold.

We use a **5-minute threshold** as a reasonable operational benchmark. This reflects:

- Typical additional boarding time associated with securement; and
- Prior FTA guidance and discussions in comparable markets.

Reporting & Monitoring

- Analysis is conducted on a rolling 4-week basis to ensure sufficient population size
- Results are refreshed weekly.
- Markets are reviewed regularly by operations leadership.
- Underlying data is documented and available for audit review.

Agencies may request detailed market-level documentation, including model outputs and underlying performance metrics.

Special Cases

- **Low-Volume Markets:**
In markets with very low WAV request volume (approximately 30 or fewer request sessions per month; or <5 unmet requests), statistical modeling may not be reliable. In these cases, we use structured average comparisons with appropriate documentation.
- **100% Accessible Fleets:**
When all vehicles are accessible, equivalency monitoring for vehicle type is not applicable, per ADA guidelines that stipulate no equivalence monitoring is required if 100% of vehicles are accessible.
- **Fully Pre-Booked Paratransit Services:**
For services that do not operate on-demand and do not present “seat unavailable” scenarios nor provide a wait-time, availability equivalency analysis is not required.