

Transportation Services

Standards of Operation and Scope of Services

Based on standards set by the New York City Department for the Aging and the New York State Office for the Aging. Updated February 2024

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Introduction

The Transportation Program is intended to complement existing transportation services available to older adults in New York City. The program provides Individual and Group transportation. Individual transportation service provides trips for older adults who have requested the service due to mobility limitations or inability to drive or use public transportation. Individual transportation enables these older persons to participate in community programs such as older adult centers, to access medical care, to do errands necessary for daily living (e.g., access grocery stores, pharmacies, banks, food pantries), and to maintain family and other ties to the community when they would not otherwise be able to do so. Individual transportation may be provided through car or taxi service, or bus/van pick-up. It may be door-to-door, curb-to-curb, or pick-up along a fixed route or semi-fixed route. More than one passenger may be accommodated on an "individual transportation" trip if the vehicle permits (e.g., the vehicle may pick up each passenger from his or her home for a trip to a grocery store). The provision of individual transportation requires information about the client's transportation needs (intake) in NYC Aging's client data system.

Group transportation service provides trips to a group of older individuals from the same pick-up point originating within the catchment area of the transportation provider to the same destination, to recreational, cultural, educational, and social events, community gyms, theaters, farmers markets, shopping centers and other locations. Group transportation promotes socialization and community involvement. Participation is not restricted to those with mobility limitations. Information about the individual's transportation needs (i.e., Transportation Intake) does not need to be completed for group participants, but the client must be registered in NYC Aging's client data system. Group transportation participants do not have to reside within the catchment area of the transportation provider.

Transportation services are provided directly with a program's own vehicle(s) or through sub-contract or arrangement with one or more qualified entity (e.g., car or taxi service; private bus company). If the provider utilizes a subcontractor, it is the responsibility of the provider to monitor and assess the activities performed under the subcontract, and to ensure that the subcontractor's activities are provided in accordance with the requirements in the provider's contract as well as these and any other standards set forth by NYC Aging and the New York State Office of the Aging (NYSOFA).

Unless otherwise indicated, the standards below apply to NYC Aging's Stand-alone Transportation Programs, as well as Older Adult Center and NORC Programs that offer transportation services.

All NYC Aging-funded Transportation programs must adhere to applicable requirements in the NYC Aging General Program Standards (https://www.nyc.gov/assets/dfta/downloads/pdf/community/General-Program-Standards-v02-01-2023.pdf).

Scope

Standard 1. Eligibility

The program serves eligible individuals in its catchment area.

Compliance 1.1. The program serves clients who meet the eligibility criteria below:

For all transportation services:

Are 60 years or older.

For individual transportation:

- Reside in program's catchment area.
- Have been assessed and have a documented need for the service. (See Standard 2)
- Are unable to make a trip because it is beyond their walking or driving ability.
- Have a permanent or temporary physical, cognitive, sensory, or mobility limitation that prevents utilization of public transportation.
- Terminals for public transportation are situated beyond their walking ability.
- Trip by public transportation requires transfers beyond their ability.

For Stand Alone Group transportation:

- Group trip clients do not have to reside in program's catchment area.
- Group trip clients do not have to be assessed and have a documented need for transportation.

Note:

- Clients who do not meet the eligibility criteria are assisted with referral to other programs if possible, and the referral service is documented in the NYC Aging client tracking system.
- The program does not provide medical transport to Medicaid clients. Medicaid clients requesting individual transportation to or from medical services are referred to Medicaid transportation.
- o Transportation to non-medical appointments can be provided to Medicaid clients.
- The program does not assess clients for insurance eligibility.
- The program does not request medical insurance information from clients, including proof of insurance coverage.
- The program does not deny rides to clients based on their insurance status.
- The program may provide transportation to social and medical adult day care clients only in the event the client is not Medicaid eligible or cannot get this service through his/her Medicaid Managed Care Plan. This is documented in the client's file in the NYC Aging client tracking system.
- NYC Aging funds must not be used for trips to casinos.

Standard 2: Informed Consent

The program obtains informed consent from each client.

(See also NYC Aging General Program Standards, Section 2)

Compliance 2.1. Consent to Collect Personal Information. The program obtains signed consent to collect and record data from clients before any personal identifying information is entered into the NYC Aging client tracking system.

Compliance 2.2. Consent to Refer and Share Personal Information. The program obtains signed consent to refer and share personal information form before any information is shared for referral or other purposes.

Compliance 2.3. Revocation of Consent. Clients wishing to revoke consent are provided with an Informed Consent Revocation Form by mail, or by email if requested by the client. Consent remains in effect until the client revokes it. Client consent is in effect until the case is closed or consent is revoked.

Compliance 2.4. Documentation of Consent. The program utilizes the NYC Aging approved consent forms. The program uploads all signed consent forms in the client's record in the client tracking system.

Compliance 2.5. Consent for non-English Speakers. Consent documents are made available to clients in the language understandable to them.

• If necessary, the program uses a qualified interpreter to aid in the consent process. (See NYC Aging General Program Standards, Standard 9 for more on Language Access requirements.)

Standard 3. Intake

The program completes an intake in NYC Aging's client data system for all clients requesting individual transportation.

Compliance 3.1. A worker conducts an intake with each individual requesting individual transportation prior to service provision to screen for eligibility and to obtain pertinent information. Exception: When the client has an urgent need for individual transportation, the intake may be completed after the first-time service is provided. This is documented in the client's file in the NYC Aging client data system.

Compliance 3.2. The program registers each client found to be appropriate for individual transportation and enters information about the transportation need into the client's record.

• If the program receives a referral for individual transportation from another NYC Aging program through NYC Aging's client data system, the program acknowledges the referral.

Standard 4. Service Provision

The program provides the transportation services in its contract.

Compliance 4.1. The program provides services outlined in its contract.

- Trips may include, but are not limited to, medical appointments, social service appointments, stores, banks, paid or volunteer jobs, recreational activities, and places of worship.
- If capacity permits, and with NYC Aging's approval, trips may be provided to older adults who reside outside
 of the program's catchment area. These trips are authorized in writing (with reason for providing the trip
 explained) by the program director or transportation coordinator.
- With NYC Aging approval, limited trips may be provided to locations outside the boundaries of the five boroughs of NYC. Requests for approval must be submitted to NYC Aging at least three (3) business days prior to the trip. Trips must be pre-authorized in writing by NYC Aging. For both individual and group rides, maximum mileage does not exceed 40 miles outside of New York, unless prior approval is obtained from NYC Aging.
- Round trips must originate in the program's catchment area.

- Group trip must originate within the program's catchment area.
- Services cannot be exclusively offered to clients and programs within the program's organization.
- The program accepts referrals from hospitals, case management agencies and other social service providers.

Compliance 4.2. "Transportation Only" Programs can demonstrate that:

- The program accepts referrals and trip requests from eligible clients residing anywhere in its catchment area.
- The program does not solely serve clients traveling to and from their sponsor's Older Adult Centers.
- The program must not be used for rides to conduct continuous daily tasks. Daily trips to and from the Older Adult Centers are not the purpose of the Transportation Program. Individual and Group transportation providers must prioritize trips based on the purpose of the program and can limit the number of weekly rides to the Older Adult Centers.
- The program conducts regular outreach throughout the catchment area so that potential clients are aware of its services.

Compliance 4.3. When feasible, drivers should be rotated among routes.

Standard 5. Targeting and Outreach

The program conducts targeting and outreach to increase awareness of the service. (See also General Program Standards – Adherence to Target Populations and Target Areas)

Compliance 5.1. The program targets individuals with the greatest economic or social needs, including those who are minority, low-income, frail, or socially or linguistically vulnerable.

Compliance 5.2. The program does outreach to all community members and not only to participants/clients of programs operated by its sponsoring organization.

Compliance 5.3. The program gives priority to community members who need its services due to living in isolated and/or underserved areas or being unable to afford and/or reach public or private transportation services.

Standard 6. Cultural Competence and Language Access

The program is linguistically and culturally competent. (See also NYC Aging General Standards of Operation, Standard 19.1)

Compliance 6.1. Language Access. The program provides language assistance free of charge to persons with limited English proficiency (LEP).

Compliance 6.2. Language Access The program has a telephonic interpretation service contract or similar community arrangement with a language interpretation services provider to assist LEP individuals.

Compliance 6.3. Cultural Competence. Services are provided with respect for cultural differences, preferences, and styles of communication.

Standard 7. Persons with Disabilities

The program accommodates older persons with disabilities.

Compliance 7.1. Any new vehicle purchased or leased with City funds for providing NYC Aging transportation services meets Americans with Disabilities Act requirements. (The program may choose a vehicle that does not meet ADA requirements only if the program has adequate ADA-compliant vehicles available to carry out the services in its contract.)

- Programs that do not own or lease an accessible vehicle have sub-contract or formal arrangements with an organization that can accommodate the needs of persons with disabilities.
- Car Service providers used by the program for persons with disabilities must comply with the NYC Tax and Limousine Commission's wheelchair accessibility Rule 6-07(f) and provide wheelchair-accessible service upon request, at an equivalent price and service level as non-wheelchair-accessible transportation.

Compliance 7.2. Home attendants or other escorts arranged for by the client may accompany persons in need of special assistance on the trip. *Note: Units must not be reported for these individuals.*

Compliance 7.3. The program provides current and accurate information on Access-A-Ride for eligible clients and assists with applications and referral as needed.

Standard 8. Accommodating Clients

The program accommodates as many clients as possible or facilitates their access to other transportation services.

Compliance 8.1. Where possible, the program maintains linkages/referral arrangements with other transportation providers that can assist the client(s) when the program is not able to provide requested services.

- The program manages a database of transportation alternatives (Access-A-Ride, local car services, other NYC Aging -funded transportation programs, etc.), and refers/connects clients when necessary and appropriate.
- Clients for individual service are placed on a waiting list only when the client's needs cannot be accommodated through subcontractors, referral, or linkages. This includes the use of Citywide transportation services.

Compliance 8.2. The program uses a rotation system or other volume management tactic when recurring group trips cannot be accommodated due to high demand by aging service providers.

Standard 9. Voluntary Contributions

The program has a written policy for soliciting, collecting, safeguarding, and accounting for voluntary contributions.

Compliance 9.1. The program provides opportunities for passengers to make a voluntary contribution.

- The program solicits contributions for services.
- The suggested contribution shall not exceed the actual amount of the ride.
- The program makes clear that the suggested contribution is a guide, and that clients may contribute according to their own circumstances.
- Contributions are voluntary and confidential.
- No person will be denied service because of their inability or decision not to give a contribution.

- Passengers are informed of the actual or approximate cost of the trip.
- Where services are being provided by a subcontractor, the prime contractor solicits contributions from clients quarterly.

Compliance 9.2. Collecting contributions.

- Contributions must be deposited into a locked box on vehicles that belong to prime contractors with NYC Aging.
 Note: Subcontractors shall not collect or solicit contributions.
- The driver must not have access to the contents of the locked box.
- The contribution is made directly by the client, when possible.
- Envelopes are provided for confidentiality purposes, and for clients who wish to mail their contribution.
- Contributions can be solicited by the provider, by mail or e-mail to the client, on a quarterly basis.

Compliance 9.3. Use of contributions.

- The program uses the contributions to expand or support services.
- Contributions must be utilized to expand or support services during the program period in which they were collected
- Contributions must not be used as tips (Note: Drivers must not accept tips or gifts, monetary or otherwise).

Compliance 9.4. Accounting of contributions.

- The locked box is returned to the program or contractor's office at the end of each route.
- The locked box is opened at the program or contractor's office and counted daily by two staff members.
- Each person counting the contributions signs a form certifying the amount received.
- After the contributions are counted and recorded, the fewest number of people possible must handle cash.
- The program must not make withdrawals or loans or cash checks from contributions received. The entire amount of contribution collected must be used for the purpose intended.
- Contributions received through the mail must be recorded in the ledger by the staff person receiving and opening the mail. Receipts should then be forwarded to appropriate staff for preparation for deposit.
- The ledger and documentation (e.g., deposit slips, certified forms, etc.) of contributions received must provide a clear audit trail so that at any given time, it is known how much has been collected.
- Contribution records must be furnished upon request by NYC Aging.
- When feasible, drivers are rotated among routes.

Compliance 9.5. Securing contributions

- Staff must not take contributions home.
- The funds must be stored in a locked box in a secure location at the provider's office daily.
- The entire amount of contributions collected must be deposited in a bank no less frequently than weekly.

Service Levels

Standard 10. Budgeted Units and Rides

The program provides the number of budgeted transportation units and (rides) annually.

Compliance 10.1. The total number of units and (rides) delivered for transportation services is as contracted.

Compliance 10.2. The number of units reported to NYC Aging for transportation service matches the number of one-way trips clients received, as documented in NYC Aging's client data system. (i.e., Service levels reported on invoices

match levels recorded in client data system.)

Compliance 10.3. Each group trip must have a minimum monthly average of at least five (5) passengers each direction.

Compliance 10.4. The program must not exceed the approved budgeted monthly planned units without prior approval from NYC Aging.

Standard 11. Unit Definition

The program uses the correct unit definition in documenting the provision of services.

Compliance 11.1. The unit of service for an individual ride is each *one-way trip* per older adult. When budgeting and invoicing, providers will be reimbursed on the number of one-way rides per vehicle.

Example 1: The program transports five (5) older adult center members <u>individually</u> from their homes to the center and back home as these older individuals have a mobility limitation, or because walking or driving to the center or taking public transportation is not feasible. This is an example of individual transportation. If this individual transportation service is provided to five (5) older adult members, it is reported as ten units of transportation (five people travel round trip). This is reimbursed as ten (10) individual rides.

Example 2: The center organizes a day trip to Yankee Stadium to see a baseball game. Forty-three older individuals participate. This is an example of group transportation. It is reported as eighty-six units of transportation service (forty-three individuals travel round trip). For the Stand-Alone Transportation Programs, this is reimbursed as two group rides (one ride to Yankee Stadium and one ride back to the center).

Example 3. The program takes an older individual to the older adult center. After lunch, the program drives the older individual to a local shopping center to pick up medications and groceries. The older individual is then picked up and transported home. This is an example of individual transportation. It is reported as three units of transportation service (one individual x three separate trips/locations) This is reimbursed as three individual rides because the escort is not counted. This would be reimbursed as three individual rides.

Compliance 11.2 Transportation units are not counted for trips provided to:

- Home attendants or other persons who accompany clients. Units are counted only for clients registered for the services.
- Persons whose trips have been purchased from the program by another funding source.

Staff Appropriateness and Continuity

Standard 12. Staffing Level

The program has sufficient staff to provide the transportation service.

Compliance 12.1. The program maintains sufficient staff to provide the services as described in the program's RFP proposal. This includes maintaining the staffing capacity to serve the entire catchment area and proposed number of clients each month.

Compliance 12.2. The program actively manages employee turnover to ensure program quality, including utilizing organized, efficient, and realistic scheduling procedures.

Standard 13. Staff Qualification

The program ensures that transportation staff is appropriately qualified.

Compliance 13.1. Driver license requirements. Each driver has an appropriate license:

- Class D or Class E: Small van (18,000 pounds or less/adult seating capacity up to 14 including driver).
- Commercial Driver's license C with a passenger endorsement: van (26,000 pounds or less/adult seating capacity of 15 or more).
- Commercial Driver's License B with a passenger endorsement: bus (26,001 pounds or more/adult seating capacity of 15 or more).

Compliance 13.2. Driver qualifications prior to employment. Each driver meets these qualifications prior to employment:

- Three years of licensed driving experience (documented on application form).
- No convictions for driving while intoxicated during past two years.
- No more than one moving violation within past two years.
- Two References (checked).
- Background Check (documented).

Compliance 13.3. Ongoing driver qualifications.

- On an annual basis, the program obtains information about each driver's record during the past year
 from the New York State Department of Motor Vehicles (NYS DMV). Request can be made on required
 form MV-15.
- The program takes appropriate steps to discipline or terminate the employment of any driver with a DWI
 conviction or moving violation within the past year.
- The program ensures that drivers complete a defensive driving course within six months of employment.

Standard 14. Staff Training and Supervision

The program ensures that transportation service staff are appropriately trained and supervised.

Compliance 14.1. The program documents that all new staff are trained on the following:

- the aging process, including how to work with older persons (e.g., effects of aging on mobility, sight and hearing, and cognition);
- courtesy to passengers, including inquiring if passengers need assistance getting in and out of vehicles;
- safety and accident prevention;
- operation of motorized lifts and assistive devices:
- protocols for inclement weather or natural disaster:
- protocols in the event of a break-down or vehicle problem:
- what to do if a passenger gets sick;
- · accident management and reporting; and
- emergency plans and protocols.

Compliance 14.2. A designated supervisor meets regularly with all staff that provide transportation either individually or in a group to review service delivery issues.

Compliance 14.3. A supervisor accompanies each driver on a trip at least once yearly and documents performance.

Procedures and Methods

Standard 15. Quality of Service

The program ensures that service is safe, efficient, timely and reliable.

Compliance 15.1. The program monitors service delivery to ensure that drivers use safe driving techniques, are courteous, sensitive to the needs of passengers, and free from any health or lifestyle problems that might endanger passengers or interfere with the performance of their duties.

• The program annually reviews the safety and courtesy records of any sub-contractors or other companies with whom it arranges for transportation services for its clients.

Compliance 15.2. The program ensures that drivers determined, by an insurance provider, to be fault in an accident are either required to take remedial steps to improve their driving (defensive driving course or other type of retraining), subjected to disciplinary action or terminated.

- The program ensures that any subcontractors or other providers of arranged transportation for program clients:
 - Report to the program all accidents involving clients.
 - O Share with the program any police reports on accidents involving the program's clients.
 - Require drivers at fault in an accident to take action to improve their driving (defensive driving course or other type of retraining), subject these drivers to disciplinary action or terminate their employment.
- The program terminates any arrangement with a subcontractor or other provider of transportation services if more than one at-fault accident occurs during a year.

Compliance 15.3. Emergencies on Trips.

- The program has a written plan to deal with emergencies that occur on trips, such as accidents, medical emergencies, or the disappearance of a participant from the group.
- The written plan specifies what to do for the ill or injured individual; what to do for the rest of the group; criteria for ending the trip; who to notify and what forms to complete.
- The program ensures that a staff person or volunteer of the organization that has organized the trip is on each trip as the designated "leader". The designated leader knows the exact headcount for the group and has been trained on emergency procedures.
 - Before each group trip, the designated leader will do a headcount, and ensure that participants are carrying identification, and that they have the telephone number of the center.
 - Group trip participants are informed of what to do in the event they are separated from the group, or if they intend to leave the group for any reason.
- If a participant is "lost" from the group, and her/his whereabouts cannot be ascertained, the incident is immediately reported to the program and sponsor, to NYC Aging and to the police, if warranted.

Compliance 15.4. The program dispatches vehicles and orders car service in a timely and efficient manner.

- Passenger pick-up for individual service is timely and reliable.
- Passengers are notified in a timely manner when pick-up will be earlier or later than scheduled.
- Drivers are equipped with cellular phone, or the program has two-way radio enabling the driver to be in contact with the dispatcher and/or transportation coordinator.
- Subcontractor(s) and other providers of arranged transportation, inform the program immediately when unable to pick up a client for whom a reservation has been made.

- A back-up driver is used if a regular program driver is not available.
- If the program's vehicle(s) are out of service, the program coordinates with other transportation providers in its area or makes appropriate accommodations to minimize service disruption.
- The program has a written procedure for receiving reservations and scheduling service provision.

Compliance 15.5. The program has a procedure to avoid any passenger being "stranded" – i.e., not picked up for a scheduled return trip.

Subcontractors and other providers of transportation arranged by the program notify the program immediately
when any client is a "no show" for a reservation. The program has written procedures for handling no shows,
including chronic no shows.

Compliance 15.6. All vehicles, including those used by subcontractors or other providers of transportation arranged by the program, are equipped with seat belts, first aid kits and fire extinguishers (if applicable) and signs are posted in vehicles requiring passengers to use seat belts.

Standard 16. Monitoring Costs

The program monitors costs charged by providers of car/taxi services to the program.

Compliance 16.1. The program has an accurate method of reconciling invoices received from car/taxi service providers against the program's authorization records.

Physical Equipment

Standard 17. Vehicle Safety

The program ensures that vehicles are in safe operating condition.

Compliance 17.1. The program ensures the safety of its own leased or owned vehicles, vehicles of subcontracted transportation providers.

- Vehicles with a capacity of ten or more are equipped with working fire extinguishers.
- Each vehicle is equipped with a first aid kit.
- Seat belts, doors, lights, wipers, etc. are in good working order.
- Regular maintenance and safety checks are scheduled. Vehicles are also inspected regularly by the transportation coordinator or other qualified supervisor to identify safety, comfort, and accessibility issues.
- Vehicles are inspected by a state certified vehicle inspection station annually.
- Vehicles are registered annually.
- Repairs are timely.
- Wheelchair lifts and other equipment on the vehicle are maintained in working condition.

Standard 18. Vehicle Maintenance

Vehicles are maintained in good condition.

Compliance 18.1. Vehicle condition

- Exteriors of vehicles are washed on a regular basis.
- Interiors of vehicles are clean.

- Litter is removed from vehicles on a daily basis.
- Vehicles are protected against theft and vandalism.

Standard 19. Vehicle Insurance

The program ensures that **Vehicles are appropriately insured.**

Compliance 19.1. The program maintains vehicle insurance coverage from a company licensed or authorized to do business in the State of New York.

- Coverage names the City and NYC Aging as additionally insured on a primary and non-contributory basis.
- Coverage protects against all liability for bodily injury, death, personal injury, and property damage in an amount not less than one million dollars (\$1,000,000) per occurrence and two million dollars (\$2,000,000) in aggregate as well as physical damage collision and comprehensive coverage (\$250 deductible) required for all vehicles with less than 35,000 miles and/or less than three years old.

Emergency Preparedness and Response

Standard 20. Emergency Preparedness and Procedures

The program has current plan and procedures for responding to emergencies. (See also NYC Aging General Program Standards, Standards 27 and 28)

Compliance 20.1. The program engages in emergency preparedness planning and exercises and works with NYC Aging to ensure the provision of services and continuity of care as directed by NYC Aging in an emergency and/or crisis.

Compliance 20.2. The program submits its emergency plan to NYC Aging's Office of Emergency Preparedness & Response ("OEPR").

Compliance 20.3. The program collaborates closely with OEPR to facilitate preparedness actions, training activities, and exercises.

Compliance 20.4 The program should be prepared to assist NYC Aging and NYC Emergency Management in the event of a local or citywide emergency. When requested, the program develops and submits to NYC Aging written emergency plans that list available vehicles for an emergency.

Compliance 20.5. The program has a written plan to deal with emergencies that occur on trips, such as accidents, medical emergencies. (See Compliance 13.3)

Compliance 20.6. In the event of a public health emergency, the program adheres to any additional guidance issued by NYC Aging.

Documentation and Recordkeeping

Standard 21. Data Entry and Data Management

The program implements regular and appropriate data management and monitoring methods.

Compliance 21.1. The program utilizes the NYC Aging client tracking system to enter client data and record services. (NYC Aging recommends having a dedicated staff for data entry and data management.)

Compliance 21.2. The program inputs units of service into the NYC Aging client tracking system at least weekly.

Compliance 21.3. Reconciliation of subcontractor usage should occur at least weekly for timeliness of data submission.

Compliance 21.4. The program maintains complete, accurate, and up-to-date records of clients and service delivery in the NYC Aging client tracking system.

Compliance 21.5. Staff updates client information in the NYC Aging client tracking system annually, or in line with specific requirements put forth by NYC Aging.

Standard 22. Documents and Records

Records and documentation are properly maintained.

Compliance 22.1. The program maintains appropriate records and documentation for individual and group rides.

- Transportation Logs.
- The Daily Route Sheet, and/or Car Service Reservation Sheet, and Contribution Record is completed each day service is delivered for each vehicle in use.
- Logs indicate date, passenger names, whether the trip was one way or both ways, purpose of the trip, pick-up location, and destination, and pick-up and return times. Logs also include a place to record whether a contribution was received.
- The driver of the vehicle signs the daily record.
- The Transportation coordinator (or supervisor) and one other staff person count the contributions received, and both sign the record.
- Daily totals of one-way trips made by each vehicle, and contributions received, are transferred to a recorded.

Mileage.

 For both individual and group rides, maximum mileage does not exceed 40 miles outside of New York, unless prior approval is obtained from NYC Aging.

• Equipment maintenance checks, inspections, and repairs.

- The annual inspection record and registration for each vehicle is maintained on the vehicle (this
 includes for vehicles owned by subcontractors)
- For vehicles owned by the contractor, the program documents the date, reason, and length of time that vehicles are out of service.

Car/taxi/ambulette service agreements.

- Contracts and any other written agreements are kept on file.
- Billing records are kept on file.

• Staff qualifications and training records. Each driver's personnel file contains:

- Copies of current license
- o Completed Job Application Form, including background check, references, and driving record.
- Annual New York State Motor Vehicle print-out

- Documentation of new driver orientation, training, and any ongoing training with name of participant, date of orientation, date of training, content of training, name of person providing the training.
- Proof of completion of defensive driving course.

• Complaint and accident files.

- o Complaint files are maintained, with appropriate actions taken documented.
- o Accident files are maintained, with all pertinent documentation, police reports, etc.

Standard 23. Complaints and Satisfaction Surveys

The program has a policy for handling client complaints and for measuring client satisfaction.

Compliance 23.1. The program has written policy and procedures that covers client complaints or feedback about its services.

Compliance 23.2. The program conducts a survey, at least annually, to evaluate client experience and satisfaction.

Compliance 23.3. The program informs clients about grievance procedures. (See General Program Standards, Standard 12)