



August 3, 2026

Adam Schlidge
Acting Associate Administrator for Budget and Policy
Federal Transit Administration
US Department of Transportation
Washington, DC 20950

Re: Request for Information: Family Friendly Transit (FTA-2026-0232)

Dear Acting Associate Administrator Schlidge:

The undersigned members of the Consortium for Constituents with Disabilities (CCD) Transportation Task Force appreciate the opportunity to respond to the Request for Information on Family Friendly Transit. CCD is the largest coalition of national organizations working together to advocate for Federal public policy that ensures the self-determination, independence, empowerment, integration, and inclusion of children and adults with disabilities in all aspects of society. The CCD Transportation Task Force advocates for fully accessible transportation across all modes that is affordable, equitable, sustainable, and reliable – including for families with individuals with disabilities. We believe that people with disabilities should be able to travel on their own or with support and should be able to choose how they live in the community.

The more than 45 million people with disabilities¹ in the United States are individuals with many different roles, preferences, and needs when it comes to transportation. While many people with disabilities struggle to find employment (often because of transportation barriers), many are also students, workers, volunteers, and retirees. Some are parents, siblings, children, and distant relatives, and some are single. They live independently, support their families, and are supported by their families, friends, and caregivers. Many people with disabilities are nondrivers who rely on transit services for mobility regardless of whether they travel for work, recreation, healthcare, or to support their own families. People with disabilities deserve independent transportation options as well as options that allow them to be accompanied by a companion

¹ The 2024 American Community Survey estimates that more than 45,000,000 civilian non-institutionalized individuals have a disability. Some estimates of the disability population are much higher.

(including their parents or children) or to be a companion to others. Having choices in how to travel is key to independence.

We appreciate the Federal Transit Administration's (FTA) consideration of ways to improve measurement of whether transit services serve all people, including families. Because people with disabilities have unique travel needs at every age, we urge you to prioritize accessibility and availability of transit services when considering how transit options serve families. In these comments, we offer our perspective on ways to include people with disabilities in these efforts. We identify questions that can inform existing and new data collections to improve transportation access for people with disabilities and their families within the five identified areas.

Safety and Security

People with disabilities may have various abilities to respond to unexpected events in their surroundings and may make travel decisions based on expectations of safety and security. In addition, they have unique needs during an emergency response. Finally, people with disabilities may sometimes experience personal, disability-related crises that create perceived threats to public safety. Security measures must protect the rights and dignity of people with disabilities. Using appropriate, disability-informed response techniques can de-escalate crisis situations and ensure people with disabilities are allowed to travel independently in their communities. We recommend FTA seek answers to the below questions to understand transit safety and security for the public.

- Do transit law enforcement receive training in interacting peacefully and constructively with people with mental health, behavioral, or communication-related disabilities?
- Are agencies and first responders equipped with mental health crisis response or intervention resources?
- Do transit workers and police have access to alternative forms of communication to facilitate communication with people who are deaf or hard of hearing, people with speech disabilities, or Autistic people?
- Are emergency communications and escape routes fully accessible to people with mobility disabilities or who have various sensory disabilities?
- Which transit providers, if any, offer Direct Video Calling for people who rely on ASL?
- Do agencies provide accessible information about fare payments and make available low-income discounts to reduce fare evasion?
- Are rail platforms designed to prevent falls onto the track or between cars?

Cleanliness

Some people with disabilities are immunocompromised or have medical conditions that place them at higher risk of harm from common diseases like the cold, flu, or COVID-19. This vulnerability may influence how and under what circumstances they travel. Nevertheless, people with medical conditions still need and want to travel, so cleanliness is important to many people with disabilities. We recommend FTA request answers to the below questions from transit agencies to understand the methodologies used to define or assess cleanliness.

- To what extent are all transit facilities and vehicles equipped with effective HVAC systems that help prevent the spread of communicable diseases?
- How often are surfaces sanitized?
- Elevators are an essential element of accessibility. How frequently are elevators cleaned and sanitized?
- Are public transit stops, including seating areas, well-maintained?

Universal Accessibility

Accessibility to transit facilities and vehicles is vitally important to people with disabilities and their ability to travel. In addition, service design, including hours of operation and ability to travel with children and companions may affect the usability of transit services. We recommend FTA assess performance beyond the minimum requirements of the Americans with Disabilities Act (ADA) to measure how easily individuals of all ages and abilities, including families traveling together, can utilize the transit system.

- Are vehicles and facilities fully in compliance with ADA standards? Do agencies run vehicles or operate facilities that go beyond minimum access standards?
- How many accessibility barriers have agencies identified and how many barriers are remedied each year?
- How recently have agencies updated their ADA transition plans, and what barriers remain to be fixed?
- To what extent do agencies coordinate with local and state governments to identify and resolve accessibility barriers along paths of travel to transit? Are sidewalks and intersections near transit stops available consistently, and are they barrier free (e.g. sidewalks have curb cuts, are continuous, and are sufficiently wide)?
- When departments of transportation and public transportation providers partner with private transportation services (including rideshares, taxis, and microtransit), are those providers consistently held to the same accessibility standards as transit agencies, such as providing wheelchair accessible vehicles and ensuring passengers can ride with their service animals?

- If fixed route services are replaced by microtransit, are the hours of operation and wait times equal to or greater than those during fixed route services? Do people with disabilities still have the ability to use paratransit? If not, do microtransit drivers offer equivalent levels of assistance in the form of directions, boarding/offboarding, or assistance to the door?
- Do buses or other transit vehicles have separate spaces for strollers or luggage, allowing people who use wheelchairs or walkers access to securement and disability priority areas and seats?
- To what extent do transit providers offer or coordinate with providers that offer travel training, Orientation and Mobility, and mobility management services to help riders become more skilled at and comfortable with using public transit?
- Do agencies have advisory committees or other community engagement mechanisms for understanding the barriers faced by riders with disabilities traveling with or without their families?
- Do paratransit services allow riders to travel with their children or other family members? Are stops available on paratransit or microtransit partnerships to facilitate quick errands or to drop off/pick up children?
- Are rail crossings fully accessible, including accessible pedestrian signals where appropriate?
- To what extent is tactile directional wayfinding available on common routes in addition to required detectable warning surfaces? Is tactile delineation made between cycling paths and walking paths?
- To what extent are innovative transit designs, such as floating transit islands, tested with people with disabilities to ensure that people with disabilities have the same assurance of safety and access as people without disabilities? Is information about difficult-to-navigate facilities, like floating transit islands, incorporated into navigation apps or maps?
- Are efforts made to reduce the noise of transit facilities to the extent feasible?
- Are transit stops protected from sun, rain, and wind, and do they offer usable seating (not just leaning bars)?
- Do agencies engage in outreach to and provide education for older adults, teenagers with disabilities, families of young adults with intellectual and developmental disabilities, and other groups that may express hesitancy to use transit services? How do agencies support parents to empower their youth with disabilities to travel independently?

Real Time Service Data Availability

People with disabilities have a variety of information access needs that affect their access to real-time service data availability. It is important to keep in mind that fully accessible service

data should be provided through multiple means (visually, audibly, digitally, and tactilely) and to users regardless of whether they have a smartphone. FTA should consider the below questions on the extent to which transit agencies make real-time service data available to customers to support trip planning.

- Is accurate real-time service information available through accessible websites and apps that conform to the Web Content Accessibility Guidelines (WCAG) 2.1 Level A and AA? Can users access both the time until arrival of individual transit vehicles as well as see where vehicles are on a map?
- How well are stops mapped, and are stop locations easily findable nonvisually? Are pedestrian or accessibility focused navigation apps available to riders? Can riders easily locate and navigate elevators, ramps, and escalators?
- Is on-vehicle communication of upcoming stops always provided both audibly and visually? How often is there a failure to communicate real-time information?
- Are service alerts made available to customers through multiple means, including for riders without smartphones?
- Do riders have access to information about detours and construction that block transit stops or paths of travel to stops and stations?
- Which stops include real-time bus or train arrival information in both audible and visual form? Which stops include information in braille?
- To the extent that on-demand or microtransit services are available to riders with disabilities, do riders have access to accurate information about arrival time, pick up location, and vehicle location?
- Do riders have multiple forms of real-time access to estimated paratransit location and time information?

System Reliability

For riders with disabilities whose primary mode of transportation is public transit, system reliability is incredibly important. Because accessibility is not universal, many people with disabilities rely both on fixed route transit and on paratransit services. Innovative forms of public on-demand transportation and microtransit introduce additional complications for people with disabilities. The following questions are vitally important for assessing whether a service can be relied upon.

- When using same-day, on-demand transportation services, people with disabilities must make a choice about their travel mode. Because paratransit services, unlike fixed route, typically require advance scheduling, if an on-demand service is unavailable or unreasonably delayed, disabled riders cannot then turn to paratransit. To what extent do on-demand services replace fixed route or paratransit services and do they provide

equivalent services? What are median and average wait times for on-demand public transportation rides? Do transit agencies provide a guarantee that riders can get an accessible return trip home?

- How often are bus or rail trips missing due to mechanical issues or operator availability? How well are missing or delayed trips communicated to riders?
- How often are wheelchair users unable to board buses because the accessible space is occupied by people with strollers or luggage?
- What are typical wait times for paratransit vehicles, and how often are rides available at the pick-up and drop-off time requested by the rider?
- Do people with disabilities have access to transportation 24 hours a day? What are the services areas, and which areas do not have transportation? Can riders easily travel across jurisdictional boundaries? When services are not available, do individuals have easy access to information about alternative nondriver transportation options in those areas or after hours?
- Ridership on fixed routes often depends on not having to wait for pick-ups or transfers. What percentage of headways are less than 20 minutes?
- Given that people with disabilities tend to have both lower incomes and higher costs of living, what is the fare cost of travelling on public transportation and paratransit, and are discounts available to low-income riders with disabilities?
- Are transit priority corridors available to reduce time spent in traffic?
- Is transportation funding spent in a way that prioritizes travel times for transit and includes accessible, comfortable pedestrian paths of travel to transit stops that minimize the distance riders must walk?

Additionally, the FTA should collaborate with other agencies within the US Department of Transportation to improve data collection about how people with disabilities travel and assess the extent to which travel data can incorporate the reasons why people with and without disabilities do not travel. The National Household Travel Survey produces limited data about people with disabilities and how they travel. Improvements to identification of individuals with disabilities and developing questions specific to the disability experience would assist the Department and transit agencies with understanding who they are serving and how well people are able to take advantage of travel. Notably, a gap in many data collections is why people do not travel. In addition to the questions raised in this Request for Information, states and local transit agencies should be empowered to engage with their local disability communities to understand why people with disabilities and their families do and do not travel on public transit.

Thank you for your consideration of people with disabilities when you address family friendly transit. We urge you to consider that transportation that works well for people with disabilities is more accessible to everyone, including parents and children, older adults, and single adults. Should you have any questions, please contact the CCD Transportation Task Force co-chairs,

Sarah Malaier (smalaier@afb.org), Tyler Beck (tbeck@efa.org), Danica Gonzalves (danicag@pva.org), and Sarah Bellish (sarah.bellish@curesma.org).

Sincerely,

Access Ready

American Association of People with Disabilities

American Council of the Blind

American Foundation for the Blind

Autistic Women & Nonbinary Network

CureSMA

Deaf Equality

Epilepsy Foundation

National Disability Rights Network

Paralyzed Veterans of America

TDIforAccess

United Spinal Association