



FRAME FOR MOBILITY · TITLE VI – INNOVATION AND FUTURE-READY
INFRASTRUCTURE

MOBILITY SERVICES

The Paratransit Modernization Pilot Program Act

A FRAME Policy Paper · Title VI, Subtitle A of the FRAME Act · Sections 601–605

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PART I

THE PROBLEM

Every transit agency in the United States that runs buses or trains must also run a second, parallel service: door-to-door paratransit for riders whose disabilities prevent them from using the fixed route. Federal law guarantees the service, and federal regulation prescribes how it is delivered — response times, fares, and capacity standards are fixed by rule. Three decades of that prescription have produced the problem this subtitle addresses: the most expensive service in American transit, rising in cost year after year, under rules that leave an agency no lawful way to deliver it better.

The cost curve is the measurable core of the problem. The Government Accountability Office put the national average cost of an ADA paratransit trip at **\$29.30 in 2010 — about 3.5 times the \$8.15 cost of a fixed-route trip (GAO-13-17)**. The curve did not flatten. Los Angeles County’s Access Services, the largest dedicated paratransit system in the country, reported an actual cost of **\$61.97 per trip (\$50.06 per passenger) in FY2023**. Paratransit is an entitlement funded out of the same operating budgets that pay for buses and trains, so every dollar of that growth is a dollar of frequency, coverage, or service hours not bought for every other rider.

Nor is the money buying measured quality. The service qualities riders feel most directly — how long they wait, and whether a requested trip is refused at all — are the outcomes the prescribed model tracks least. An agency that could serve the same riders faster, more reliably, and over a wider area with a different delivery model — on-demand booking, dynamic dispatching, a mixed fleet — has no lawful way to substitute it. The regulation specifies the form of the service; compliance with the form is what is audited. The result is a service that is simultaneously an entitlement, a budget pressure, and a frozen design: guaranteed to riders, unaffordable on its current trajectory, and barred by its own rules from testing the methods that might fix it.

THE PROPOSED SOLUTION

The fix is a controlled experiment. Instead of requiring every transit agency to deliver paratransit in exactly the prescribed way, the federal government would let a small number of agencies — no more than twenty, chosen competitively — deliver it differently, and would hold them to a contract proving the new way is better for the riders who use it.

An agency that wants to take part applies with a detailed plan. It must commit to serving a larger area than it does today, to letting riders book trips on demand with a guaranteed maximum wait, and to keeping fares at the level the disability law allows. It must describe the modern dispatching technology it will use — the kind of on-demand booking and routing that ride-hailing has made ordinary — and it must bring a formal letter of support from its local committee of riders with disabilities. The application is not paperwork that precedes the real commitment: the application *is* the commitment, a binding contract the agency is held to.

What counts as “better” is not left to each agency to define. Federal officials would write the definition into a rule within a year, working with the national disability council and with representatives of local rider committees, and the law itself sets the floor the definition cannot fall below: measured against the agency’s own service in the year before, average waits must come down, refused trips must come down, and service must expand — more hours, more territory, or both. An agency is judged against the service its own riders actually received, not against a national average.

Nothing about the underlying right changes. The service remains an entitlement; what is waived is the prescribed method of delivering it, exchanged for a stricter, measured one. Oversight runs for the life of the pilot: the federal government reviews every participating agency’s performance every year, and an agency that fails to meet its contract can have its permission cancelled — in which case the old prescribed service comes back as the fallback. Three years in, the government must report to Congress on what the experiment showed and whether it should become permanent. And the pilot runs on resources agencies already have: it authorizes no new federal money. What it trades is prescription for proof.

THE LEGISLATIVE PROPOSAL

Subtitle A of Title VI is a complete, named act within the Act: the **Paratransit Modernization Pilot Program Act (Section 601)**. Its purpose is stated in one line: to give the Secretary authority to provide transit agencies “the regulatory flexibility to leverage new technologies and mobility models to deliver a more efficient, convenient, and dignified transportation service for individuals with disabilities” (**Section 602**). The sections that follow build the experiment described in Part II as law — a bounded, revocable pilot in how the federal government regulates paratransit, the complementary service the Americans with Disabilities Act requires transit agencies to provide alongside their fixed routes.

Under current law, that service is defined by prescription. Federal regulation fixes the operating criteria — response time, fares, and capacity standards (**49 CFR Part 37**) — and an agency must deliver the model as specified, whatever its measured results. The subtitle creates the substitution, and prices it: the prescribed model may be exchanged only for a contracted model that is measurably better, on metrics the Act itself floors.

THE LEGISLATIVE PROPOSAL

The mechanism has four moving parts. The Secretary establishes a competitive pilot program and may grant **not more than 20 waivers** of the ADA complementary paratransit requirements (**Section 603(a)**). A waiver is available only to an agency that demonstrates, in a binding performance contract, that its model will provide a “**quantifiably superior service**” for its eligible riders (**Section 603(b)**). That term is defined by rule, within one year, with statutory minimum metrics written into the Act (**Section 603(c)**); annual review, revocation for failure, and a report to Congress at three years complete the design (**Section 605**). Section by section:

SECTION 603 – THE WAIVER AND THE STANDARD

Section 603 is the operative grant. The Secretary “shall establish” the Paratransit Modernization Pilot Program and may grant up to 20 waivers from the complementary paratransit requirements of the ADA. The waiver standard is comparative and evidence-based: the applicant must demonstrate that its new delivery model will provide a “quantifiably superior service” for its eligible riders. Not later than one year after enactment, the Secretary — **in consultation with the National Council on Disability and representatives of local disability advisory committees** — must issue a final rule establishing “clear and mandatory performance metrics” defining the term. The Act itself sets the floor those metrics must meet:

SECTION 603(C)(2) – MINIMUM REQUIREMENTS

- (A) “a measurable reduction in average trip wait times as compared to the complementary paratransit service provided by the recipient in the year prior to the waiver”;
- (B) “a measurable reduction in the rate of trip denials”; and
- (C) “an expansion of service, as measured by an increase in the total hours of operation or an expansion of the geographic service area.”

The comparison baseline is the agency’s own prior-year service — each waiver is judged against the service its riders actually received, not against a national abstraction.

SECTION 604 – THE APPLICATION IS THE CONTRACT

Section 604 collapses the distance between applying and promising: the application “shall serve as a binding performance contract.” It must contain a detailed service plan committing the agency to **(1)(A)** an expanded service area, **(1)(B)** on-demand trip requests with a maximum guaranteed wait time, and **(1)(C)** a fare structure consistent with the ADA; **(2)** a description of the modern, on-demand dispatching technology to be used; and **(3)** a formal letter of support from the local disability advisory committee. The commitments that win the waiver are the commitments the agency is held to.

THE LEGISLATIVE PROPOSAL

SECTION 605 – OVERSIGHT, REVOCATION, VERDICT

The Secretary reviews each recipient's performance annually (605(a)); a recipient failing to meet the standards in its performance contract may have its waiver revoked (605(b)); and not later than three years after enactment the Secretary must report to Congress evaluating the pilot and providing legislative recommendations for a permanent program (605(c)). The pilot is designed to end in a decision, on evidence, one way or the other.

WHAT THE SUBTITLE DOES NOT DO

It does not repeal or dilute the ADA entitlement: the waiver exchanges one service obligation for a stricter, measured one, and revocation restores the prescribed model as the fallback. Fares must remain consistent with the ADA (Section 604). And on financing, the bill is silent, plainly: **the subtitle contains no appropriation and no funding authorization** — the pilot runs on the agencies' existing operating resources.

PART IV

THE DATA CASE

Why would the proposal work? Because the experiment it authorizes has, in its essential form, already been run — by a major transit agency, at scale, and evaluated by the U.S. Department of Transportation — and because the instrument the subtitle uses, a capped waiver against a binding performance contract, is designed around exactly the qualifications that evaluation produced. The evidence falls in two parts: what the alternative model did where it was tried, and why the contract, not the declaration, is what makes the result transferable.

THE MEASURED ALTERNATIVE: BOSTON

Beginning in 2016, the Massachusetts Bay Transportation Authority allowed eligible riders of The RIDE, its paratransit service, to book on-demand trips with transportation network companies instead of reserving a day ahead. USDOT's deployment evaluation records the result: the average traditional RIDE trip cost the MBTA \$59; the average on-demand trip cost \$9.10. By shifting trips, the MBTA reduced overall program spending **even as total paratransit trip volume rose 30 percent**, and riders saved a cumulative **21,000 hours** of waiting and travel time across more than 100,000 trips, with customer satisfaction improving strongly. The three quantities the FRAME contract prices — cost per trip, waiting time, and trips served — all moved the right way at once, in live operation, under federal evaluation.

Evidence check. The MBTA's own board evaluation (February 2018) adds the necessary caution: first-year system-wide savings were modest — roughly \$302,000 — because only a small share of trips was eligible to shift. The per-trip economics are not in dispute; the system result depends on design, eligibility, and the service commitments extracted in exchange. That is precisely the FRAME design: not a declaration that the new model wins, but a capped pilot in which each participating agency must contract for superiority on wait times, denials, and service span — the three measures on which the incumbent model is weakest — and lose the waiver if it does not deliver.

WHY A WAIVER WITH A CONTRACT IS THE SOUND INSTRUMENT

The defect of the current regime is not its goals, which are the ADA’s own. It is that the regime regulates inputs and therefore cannot learn. Prescribed reservation windows, prescribed service criteria, and prescribed response standards freeze the delivery technology of the era in which they were written; an agency that adopts on-demand dispatching, dynamic routing, or a mixed fleet gains no regulatory credit for better outcomes and carries full compliance risk for deviating from the prescribed form. The predictable result is the one the cost data show: compliance without improvement.

Subtitle A inverts the regulatory object. What is specified is the outcome — shorter waits than the agency’s own baseline, fewer denials, more service — defined by rule, with the disability community at the table when the metrics are written and holding a formal gate at the application. What is freed is the method: the technologies and mobility models the purpose section names. And the arrangement is self-correcting in a way input regulation is not. Annual review measures the contract against the baseline; revocation returns a failing agency to the prescribed model; and the three-year report converts at most 20 local experiments into the evidence base for a permanent program — or for ending the experiment with the question answered.

That is the technical case. It does not require believing the new model always wins. It requires only the observation that a service costing \$29.30 a trip in 2010 and \$61.97 a trip in the largest system in 2023, delivered under rules that forbid testing anything else, is a service whose governing statute should contain a controlled way to test something else — with the riders’ representatives holding the pen on the definition of “better.”

THE NUMBERS BEHIND SUBTITLE A

\$29.30

Average cost of an ADA paratransit trip, 2010 — 3.5× the \$8.15 fixed-route trip (GAO)

\$61.97

Actual cost per paratransit trip, FY2023, Los Angeles County Access Services

\$59 → \$9.10

MBTA cost per trip, traditional RIDE vs. on-demand pilot trips (USDOT evaluation)

20

Maximum waivers under the pilot — each a binding performance contract (Sec. 603)

WHAT A WAIVER MUST PROVE

Measured against the agency’s own prior-year service: shorter average waits, fewer trip denials, and expanded service — more hours, more territory, or both (Sec. 603(c)(2)).

WHAT HAPPENS IF IT FAILS

Annual federal review; revocation returns the agency to the prescribed model; and a report to Congress at three years decides the pilot’s future (Sec. 605).

SOURCES

Legislative source. Framework for Rebuilding America’s Mobility Economy (FRAME) Act, Official Draft, December 15, 2025 — Title VI, Subtitle A (the Paratransit Modernization Pilot Program Act), Sections 601–605. All section references, quotations, and descriptions of the proposal are taken from the bill text. The subtitle contains no appropriation or funding authorization; the paper notes the silence rather than filling it.

Data source 1 — the national cost baseline. U.S. Government Accountability Office, *ADA Paratransit* (GAO-13-17, 2012) — average paratransit trip cost of \$29.30 in 2010 against \$8.15 for fixed-route service, the 3.5-to-1 ratio cited in Parts I and IV. [gao.gov/products/GAO-13-17](https://www.gao.gov/products/GAO-13-17).

Data source 2 — the current cost curve. Access Services (Los Angeles County), *FY25 Budget Book* — FY2023 actual cost of \$61.97 per paratransit trip and \$50.06 per passenger, from the largest dedicated paratransit system in the country. [accessla.org](https://www.accessla.org).

Data source 3 — the measured alternative. U.S. Department of Transportation, ITS Deployment Evaluation, ITS Knowledge Resources record 2019-B01342 — MBTA The RIDE / transportation network company pilot: \$59 average cost per traditional trip against \$9.10 per on-demand trip; overall spending reduced while total trip volume rose 30 percent; 21,000 rider hours saved across more than 100,000 trips. itskrs.its.dot.gov/2019-b01342.

Data source 4 — the counterweight. Massachusetts Bay Transportation Authority, Fiscal and Management Control Board presentation, *The RIDE On-Demand Paratransit Pilot* (February 26, 2018) — first-year estimated savings of approximately \$302,000 and the eligible-trip share qualification cited in the evidence check in Part IV. cdn.mbta.com.

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