



Contact Us

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THE RHODE ISLAND PUBLIC TRANSIT AUTHORITY

ADA Paratransit User Guide

Welcome to RIPTA ADA Paratransit

ADA Paratransit is a service for people unable to use public transit due to a disability. The Americans with Disabilities Act (ADA) requires public transit agencies to provide paratransit service to eligible people with disabilities that is comparable to its fixed-route service.

ADA paratransit service is comparable to fixedroute service in several ways. ADA service:

- Is a shared-ride public transportation service. The bus may pick up or drop off other customers while en route to your destination.
- Is offered at the same times and in the same location as the regular fixed-route service. If there is no fixed-route service, there is no comparable ADA service.
- Offers comparable travel times to fixedroute service, including the time it would take to transfer and get to/from bus stops.
- Cannot restrict trip purpose.
- May drop passengers off early so that they are on time for an appointment. As when using the bus, a passenger may need to arrive up to an hour early or risk being late.
- Provides the same level of driver oversight of passengers as fixed-route bus service.
 Drivers on either the bus or paratransit are required to drive safely and ensure that passengers are not disruptive or harmful to other passengers. Drivers are not required to provide custodial care or to wait with individuals once they arrive at their

destination if a building isn't open or someone isn't there to meet them.

Topics Covered

- 1. Using ADA Paratransit Service
- 2. Rider Responsibilities
- 3. Driver Responsibilities
- 4. Suspension of Service
- 5. Providing Input and Feedback

The Ride Program

The RIde Program provides ADA paratransit through pre-scheduled door-to-door van service.

In addition to ADA paratransit, The RIde Program also provides other transportation services with different eligibility and service standards. The service described in this guide only applies to RIde's ADA paratransit service.

Definitions

<u>Fixed-Route Service:</u> Transit service that operates on a schedule and along set routes.

Ready-Time Window: Passengers are given a ready-time window instead of a set time. For example, you may be told that your pick up will be between 9:00 AM and 9:20 AM. The van is considered on-time if it arrives any time within this window

ADA Corridor: ADA paratransit service is provided within ¾-mile of a regular fixed-route. Commuter routes do not have an ADA corridor. The ¾-mile distance is determined as the crow flies, not by driving directions. A trip is only eligible for ADA service if it both starts and ends within this corridor

No Shows: A passenger is considered a "No Show" if he/she schedules a trip and does not cancel it at least 2 hours before the start of the pick-up window.

CSA: Customer Service Agent is the term used at RIde for the person assisting customers with reservations and other customer service functions.

Using ADA Paratransit Service

Below are some general rules and policies for ADA paratransit.

Where to Call for The Ride Program Reservations and Where's My Ride

The RIde Program's phone number is **(401) 461-9760**.

Where's My Ride (Afterhours)

The Customer Service Department is open 8:30 AM to 4:30 PM Monday through Friday and 8:00 AM to 4:00 PM on Saturday.

If you need to reach RIde after hours due to an emergency or because your van has not arrived within the ready time window, call (401) 461-9760. You will have the option to either leave a message or follow the phone prompts to be connected to a Paratransit Dispatcher.

No Ride reservations or schedule changes can be made afterhours.

Interactive Voice Response (IVR)

The IVR is an automated phone system that allows customers to obtain pick-up times, review pending scheduled trips or cancel pending scheduled trips. Customers can choose the IVR option that best meets their needs

Option 1: AUTOMATED CALL OUT NOTIFICATIONS

 Calls go out daily at 6:00 PM for customers with pending next day trips.
 Ask your Customer Service Agent (CSA) to enroll you in this option.

Option 2: AUTOMATED TEXT NOTIFICATIONS

 Texts go out daily at 6:00 PM for customers with pending next day trips.
 Ask your Customer Service Agent (CSA) to enroll you in this option.

Option 3: 24 HOUR AUTOMATED CALL IN SYSTEM

- There is no need to enroll.
- Customers can call the IVR by dialing RIde's phone number at 401-461-9760 and selecting option 2.
- Customers will need to enter their customer number and year of birth for verification. If you need your customer number, ask your CSA.

RIde Mobile Application

RIde has a free mobile application available in the Apple store and Google play store.

Search "RIde Reveal" in the Apple store or Google play store to download the application.

There is no need to enroll; all customers can use the App as long as they know their customer number and year of birth.

To log in you will need:

Agency code: RIPTA

Customer #

Password: 4-digit year of birth

Scheduling a Trip on ADA Paratransit

You must call and make a reservation for ADA paratransit services at least the day before you need a ride. Reservations are accepted weekdays between 8:30 AM and 4:30 PM, Saturdays between 8:00 AM and 4:00 PM, and Sundays via a voicemail message.

When calling to reserve a ride, please have the following information ready:

- Either your RIde ID number or your phone number.
- Your home address.
- Pick-up address, including street number, street name, building name (such as "ABC Medical Clinic" or "Bank RI"), suite number (if known), and ZIP Code.

- Your desired pick-up or appointment time.
 You can request either a pick up or appointment time, not both.
- Your requested return time, if you are scheduling a round trip.
- Where you want to go, including the street address and ZIP Code at your destination.
 Alert the CSA if you are scheduling a trip with multiple stops. Each stop is a new ADA trip requiring its own reservation and fare.
- If you will be using a wheelchair or other mobility device.
- If you will be bringing a service animal.
- If you will be accompanied by an assistant and/or any companion.
- Any other information you feel the RIde driver should have to help you travel in a safe and timely manner.

When you call to schedule your ride, the CSA may need to ask you to change your requested time in order to accommodate your ride request. The ADA allows us to negotiate a revised time with you that may be up to one hour before or after your requested time. However, if you give us a fixed appointment time, we will only negotiate up to one hour before the necessary time. You must make all schedule changes with the CSA. Please do not ask the driver to change your return trip, place, or time.

If you are traveling to an appointment, tell the CSA what time you must arrive at your destination, allowing at least fifteen minutes before the appointment time for unexpected delays. This allows RIde to determine an appropriate pick-up time for you. Please remember that all service is "shared-ride,"

meaning others may be riding in the vehicle with you. Please anticipate stops for other passengers to get on and off. A trip on paratransit takes approximately the same amount of time as a trip on a regular RIPTA bus, including time for transfers. RIde services are not designed to follow a direct route between your pick-up and drop-off locations.

Subscription Trips

You may request subscription service if you travel to and from the same place on the same day(s) of the week, at least once weekly. Once subscription service is scheduled, you only need to call when you wish to cancel or change the trip for a particular day(s). Passengers should be aware of RIPTA holidays, which may have a different bus schedule and corresponding ADA service. If you want to schedule a trip on a holiday, it will have to be a demand trip made for that day; subscription service is suspended on RIPTA holidays.

Same-Day Trip Requests & Changes

You must request a ride at least the day before you wish to travel. Same day requests are not accepted. If you call on the day of service to change your pick-up or drop-off time or address, Ride will attempt to accommodate the change, but does not guarantee same day service.

Remember: Because schedules are set the day before, there may be a delay of an hour or more before another vehicle is available to accommodate your ride or, another van may not be available.

When Do I Need To Be Ready?

The RIde van will arrive any time within a 20minute ready-time window. For example, if your ready-time window is between 9:00 AM and 9:20 AM, the vehicle can arrive any time between 9:00 AM and 9:20 AM. Please be ready to board the vehicle immediately upon arrival. This helps to ensure better on-time performance that benefits all riders. The vehicle will wait 5 minutes when it arrives within the 20-minute ready-time window to allow you adequate time to board. If you have not boarded the vehicle within the 5-minute period, your vehicle will leave and you will be considered a No-Show. Riders can check their ready-time window through the RIde reveal app or through the IVR system.

Pick-up and Drop-off Procedures

- ADA paratransit service is comparable to fixed-route public transit service, so, as with bus service, you may arrive at your destination early. Under ADA paratransit service, the RIde driver will not wait with you if a building is not yet open or someone is not available to meet you.
- When you call to reserve a ride, the CSA
 will enter the requested pick-up time or
 appointment time. Your actual pick up and
 drop off times will be determined by the
 final schedule of all the trip requests for
 that day, and may vary depending on the
 other people traveling each day.
- You will receive an automated reminder call the night before your scheduled trip with the ready-time window providing you

- have enrolled in call out IVR. Scheduled trip times can also be checked any time of day using the automated phone system, or by calling the RIde Program during normal business hours.
- You should be ready to board the vehicle within the 20-minute ready-time window.
 A ride is considered on time when it arrives to transport you within this window.
 A ride is considered late if it arrives after this window
- On occasion, a driver may arrive early due to cancellations or lighter than average traffic. The driver cannot leave until the start of the pick-up window. You have the choice to leave early or to have the driver wait until the start of the window.
- To avoid a no-show, you must acknowledge the driver's arrival and board the vehicle within five minutes. If the driver does not see you upon arriving at the designated pick-up point, the driver will attempt to locate you or will have a dispatcher call you. If the driver has arrived within the pick-up window and cannot locate you, you will be marked a "No Show" and the driver will be directed to go on to the next scheduled pick-up.
- There is no guarantee that a vehicle can be sent back for you up after a No-Show. Priority is given to riders on the schedule. If you are away from home and RIde brought you there, RIde will make an effort to provide a return trip for you, but will not guarantee the timing of a second trip. It is our intent never to strand a passenger we have transported away from home. However, if you are at home or at a

- location that RIde did not bring you to, a vehicle may not be sent back for you.
- When you board, be prepared to verify your name and pay the fare.
- Drivers must stay within sight of their vehicles. A driver cannot escort you past the ground floor lobby door of any building. Drivers are not permitted to enter private residences.

Remember:

- You do not have to board the vehicle before the beginning of your 20-minute window.
- The driver who arrives within the readytime window or later will wait five minutes.
 If the driver arrives before the ready-time window, the driver will wait until the start of the ready-time window before listing you as a No-Show and moving on to the next pick-up.
- You will not be considered a No-Show if you refuse a ride that arrived later than the 20-minute window.
- If the RIde vehicle has not arrived by the end of the 20-minute window, you can call RIde's "Where's My Ride" at (401) 461-9760 to report a late pick-up and obtain further assistance.
- If your ride is more than 30 minutes late, we encourage you to call the The RIde Program at (401) 461-9760 to file a complaint.
- If you use medication, we suggest you carry it with you in case your trip is delayed.

Travel Time

An ADA paratransit trip should take about the same amount of time as a trip on a RIPTA bus, including time for transfers and to get to and from bus stops. For example, if you are traveling from CCRI in Lincoln to Rhode Island Hospital, the trip would take 40-50 minutes on RIPTA. That same trip on ADA paratransit should also take about 40-50 minutes.

Fares

ADA paratransit service charges a fare of twice the fixed-route fare, \$4.00 per one-way trip as of July 2017. Escorts and companions must pay the same fare as the ADA eligible rider. Personal Care Assistants ride free, if the ADA rider was approved to travel with a PCA and the office was notified when the reservation was made that a PCA would be accompanying the rider. Both assistants and companions must start and end their travel at the same address as the eligible rider. All riders are required to pay the driver upon boarding either in cash or with one RIDE FARE that may be purchased wherever RIPTA fare products are sold or on www.ripta.com. Cash should be exact change; drivers cannot make change.

ADA fares must be paid upon boarding and are subject to change. While a Personal Care Attendant (PCA) may travel without paying a fare, at least one passenger must always pay a full fare, including adults travelling as a non-paying (age 5 & under) child's PCA. Likewise, two passengers cannot claim each other as PCAs to avoid fare payment.

Personal Care Attendants (PCA)

A Personal Care Attendant (PCA) is someone you may bring with you to assist you while traveling or with personal care or activities.

One (1) PCA may ride free when traveling with you. You **must** tell us that your PCA is traveling with you when you schedule your ride, or any time before 5:00 PM the day before your ride. This ensures that there will be room on the vehicle for you, your PCA, and other scheduled riders. A PCA must get on and off the van at the same places and times as you. Drivers cannot add riders who do not have a reservation, so if you do not make a reservation for your PCA, they will not be allowed to ride with you.

To be able to have one PCA ride free with you, you must be registered with the RIde Program as needing a PCA. This is done as part of your eligibility process. If you did not indicate a need for a PCA when you first applied to be eligible for Paratransit and now need a PCA, please call our Customer Service Department.

Cancellations and No Shows

You should cancel a ride as soon as you know you do not need it. You will be considered a "No-Show" if you:

- Call to cancel your ride less than two hours before the scheduled ready-time window or refuse the trip upon arrival of the RIde van.
- Reserve a ride but fail to meet the vehicle upon its arrival.
- Are not ready to board the vehicle within five minutes of its arrival time (when it has arrived within the ready-time window).

 Your riding privileges may be suspended if you develop a pattern of excessive noshows and/or late cancellations.

A practice of No Shows is considered when No Shows total 15% or more of a customer's total trips in a rolling 30-day period. Penalties may also follow a regular pattern of no shows, even if it does not exceed the percentage. Penalties may include suspension and loss of subscription service.

If you "no-show" for a ride, your other scheduled trips for that day will not be automatically cancelled. It is the rider's responsibility to cancel rides they no longer need.

Excessive Trip Cancellations

Please do not schedule a trip simply to reserve space on a vehicle for possible use, and then cancel the trip. Excessive cancellations could result in a warning, and, if you continue, could result in suspension of services. "Excessive cancellations" is determined when a rider establishes a pattern of recurring or frequent cancellations over a period of time. Riders will be warned prior to any suspension of service.

Seat Belts and Wheelchair Securement

All riders must wear lap and shoulder belts as required by Rhode Island motor vehicle laws. Refusal to be properly secured prior to transport could result in loss of service. If you use a wheelchair to ride on the bus, your wheelchair will be secured in the vehicle via a four-point tie-down system. We may refuse to transport you if you will not allow your

wheelchair to be properly secured prior to transport.

Mobility Devices & Wheelchairs

Passengers may use mobility devices – such as canes, walkers, and wheelchairs – on ADA paratransit services. If you transfer to a seat, the driver will assist you with proper and safe stowage of your mobility device(s), including a wheelchair. You must be able to transfer yourself or have your Assistant to help; the driver cannot help you.

All RIde vehicles are equipped with passenger lifts that meet ADA specifications. They will accommodate mobility devices such as wheelchairs and three-wheeled scooters up to 48" by 30", with a gross weight of up to 800 pounds including the passenger. Mobility devices that exceed these standards may not be transportable. If your device is larger than these dimensions or has features that may affect its securement, please call The RIde Program and speak to a manager about having your mobility device evaluated for use on RIde vehicles.

If you need to use the lift to board a vehicle, the driver will assist you. You may also board the vehicle while standing on the lift. For your safety, please be sure that your wheelchair or other mobility device is properly maintained in accordance with manufacturer's specification. We may refuse to transport any mobility device that is not properly maintained and could pose a hazard to the rider, driver, or to our equipment.

Transporting Life-Support Equipment

You may bring a respirator, portable oxygen, and/or other life-supporting equipment; this equipment must not violate laws or rules regarding transportation of hazardous materials. Equipment must be of an appropriate size to fit in our paratransit vehicles and be under the rider's or the assistant's continuous control.

Transporting Packages

All riders should limit their parcels to a reasonable number. Drivers do not assist with packages. Passengers should limit their packages to what they can carry on/off the vehicle in one trip, such as one armload of packages or the equivalent of about four grocery bags. You or your assistant or companion must carry all packages. For the safety of all riders, you may not transport explosives, acids, flammable liquids, or other hazardous or illegal materials.

Transporting Children

Children ages five and over may travel without an accompanying adult only if it can be demonstrated that they would be able to use public transit independently, if not prevented by their disability. Children who are registered riders must pay the full fare, and all rules applying to adult riders also apply to children. Children traveling as companions must also pay the full fare. Children five years of age or younger may ride free with a fare-paying adult. However, a fare must be paid when an adult is travelling as the non-paying child's PCA.

Transporting Animals

You may travel with a service animal such as a guide dog. You should tell the CSA when you

request a ride that you will be traveling with a service animal. A service animal is an animal individually trained to provide assistance to an individual with a disability. A service animal must be under the constant control of its owner or handler.

Transport Locations

We are not able to service locations that are not safe to take one of our paratransit vehicles (for example, dangerous double parking, required backing up of the vehicle, low hanging branches, snow banks, no safe area for you to board or depart etc.). Arrangements may be made for an alternative pick up or drop off location.

Emergency Procedures

In the event of an accident or emergency, please remain calm and follow the driver's instructions.

Personal Medical Issues - A rider who becomes ill, or notices another rider who may be ill, should immediately inform the driver. Drivers are not trained to provide medical assistance and are required to notify RIde's Dispatch Center for instruction.

Health and/or Safety - If a rider cannot be left alone, and the person meeting them is not at the location when the driver arrives, the rider will be transported back to the RIde Office (or to another safe location). The rider's guardian or caregiver will be notified and required to come to pick-up the rider or to make other transportation arrangements. Respite care charges may be assessed to the rider if a

pattern of this occurs. If we are unable to make contact with the guardian or caregiver, the proper authorities will be notified.

Inclement Weather Policy

RIde reserves the right to suspend, modify or cancel service during times of bad weather conditions that may jeopardize the safety of our riders, our employees, or our vehicles. On bad weather days, call RIde to determine whether we will be able to safely pick you up. The Scheduling Office will also be able to tell you if service will be cancelled.

During storms including snow, ice or high wind warnings, travel may be suspended. If you are planning to travel at times when bad weather is predicted, take into considerations the problems we may have in getting to or from an area we are unable to travel in. Also, if you are traveling during inclement weather, be sure to be prepared for longer ride times. For example, bring any medication you may need; if you use oxygen, bring an adequate (extra) supply; if you are diabetic or hypoglycemic, bring a small snack with you.

Responsibilities

Below are responsibilities designed to ensure safety and comfort for passengers and drivers.

Rider's Responsibilities:

- Carefully read all Riders' Guide materials.
- Make trip reservations at least one day in advance.

- Be ready to go at the designated pick-up location on time, at the beginning of the ready-time window.
- If the vehicle has not arrived by the end of the ready-time window, call RIde.
- Call to cancel an unneeded ride as soon as possible to avoid a "no show."
- Pay the correct fare in cash using exact change. Remember, drivers cannot make change.
- Wear seat belts at all times during transport.
- Avoid distracting the driver or annoying other passengers with inappropriate behavior.
- Maintain wheelchairs or other mobility aids in safe operating condition according to manufacturer's specifications.
- Expect "shared-ride" service on RIde vans. Others may be picked up after you, and/or dropped off before you reach your destination.
- Maintain acceptable standards of personal hygiene; please refrain from using scented products.
- Follow these common rules of courtesy:
 - No eating, drinking, or smoking on board the vehicle.
 - No riding under the influence of alcohol or illegal drugs.
 - No littering in the vehicle.
 - No radios, audible music players, or other sound-generating equipment may be played aloud aboard the vehicle.

- Provide feedback to The RIde Program when your service is unsatisfactory by calling (401) 461-9760, or by emailing us at RideProgram@ripta.com.
- When conducting business with The RIde Program office, be prepared by having all necessary information, and be considerate of others.

Driver Responsibilities: What you can expect from the drivers

Drivers must:

- Adhere to the same standards of common courtesy and personal hygiene as those required of riders.
- Drive safely at all times.
- Treat riders with courtesy and respect.
- Be in proper uniform.
- Visibly display a proper ID badge.
- Perform a thorough pre-trip inspection on the vehicle, including cycling the lift.
 Immediately report any defects to his or her supervisor.
- For safety reasons, maintain "line-ofsight" of vehicle at all times.
- Keep to the assigned service schedule for the convenience of all riders.
- Provide reasonable assistance to riders entering or leaving the vehicle.
- When requested, and if safe to do so, assist passengers to and from the main door of their origin and destination.
- Drivers may not use personal cell phones, radios, iPod™ or similar sound generating devices while on duty.

"Assistance" includes, but is not limited, to:

 Offering ambulatory passengers a steadying arm or other appropriate assistance when walking or using stairs.
 Helping persons using wheelchairs maneuver onto standard ramps and to and from the main door of their origin and destination. Guiding persons who are visually impaired to and from the main door of their origin and destination.

Drivers Are Not Permitted to:

- Enter the residence of a rider.
- Perform any personal care assistance for any rider, such as assisting with dressing.
- Lift or carry a passenger.
- Assist a rider using a wheelchair up or down any interior or exterior steps.
- Wait for a passenger to make a stop to conduct business, such as at an ATM/Cash machine or pharmacy.
- Escort a passenger beyond the ground floor lobby of a public building or beyond the front door of a private residence.
- Accept tips or any other gratuities.
- Perform errands for riders, such as picking up prescriptions or groceries.
- Operate their vehicle while distracted by cell phones, computers, or similar devices.

What Personal (Disability) Information Will The Driver Know About Me?

The driver receives information about the paratransit service or trips he/she will provide each day on a paper form called a "manifest." The manifest provides the following information

- -Each rider's name, pick up address, ready window details and destination address
- -Are you traveling with a PCA and/or companion for that trip
- -Are you traveling with a service animal
- -What type of mobility device are you using for today's trip (manual or power wheelchair, etc)

No specific personal information about the rider's disabling conditions are provided on the manifest without advance permission from the rider. From time to time, specific information may be necessary for safety purposes or to assure effective communication between the rider and driver. For example, the following notes could be on a manifest:

- -Rider cannot be left unattended.
- -Rider is deaf and communicates by reading lips or writing notes
- -Rider is non-verbal and will respond to conversation with the driver by nodding his/her head or using a speech board. Call the Customer Service Department to discuss personal information you need added to the manifest when traveling on RIde.

Suspension of Service

The RIde Program has progressive discipline to curb misuse, abuse, and inappropriate and/or illegal behavior while protecting riders' rights. Suspension from our ADA paratransit program can result when a rider:

- Obtains or uses paratransit service under false pretenses; for example, providing false information on the eligibility application or allowing others to ride in your place.
- Incurs an excessive pattern of verified "no-shows" or an excessive number of trip cancellations.
- 3. Engages in abusive or disruptive behavior (for example, threatening drivers, program staff or other riders with physical harm), or engages in illegal behavior while on board our vehicles (e.g., sale/purchase of illegal drugs, crime of any nature, etc.).
- 4. Engages in any behavior having a racist or sexual connotation with the driver or other riders.
- 5. Illegally sells, misuses, or transfers RIPTA fare products to another person, including a driver.
- Failure to meet general rules, policies or Rider's Responsibilities resulting in disruptive or unsafe conditions for our drivers, equipment or fellow passengers.

Our disciplinary process progresses from warnings to suspension, depending on the behavior. A rider may be warned first by a telephone call from a RIde Program staff member. If the behavior or action continues, the rider will receive a written warning with an explanation of the violation. Finally, if the behavior continues unchanged, The RIde Program will notify the rider of a pending suspension. Suspensions can be immediate when the behavior is illegal or potentially

compromises the safety of our driver, other riders or our equipment.

A rider is allowed to appeal the suspension or proposed suspension. A rider being suspended will be provided with a full written explanation of this process. This full description will also be provided to any rider upon request.

Appeal of Suspension

A customer (or a customer's representative) may file a verbal or written appeal for a termination or suspension of ADA service by contacting the RIde Program.

Designated RIde staff will review the information provided by the customer (or the customer's representative) and make a decision to either uphold the customer's service suspension or to excuse it within 10 business days.

If the customer is not satisfied with the review by the RIde Program, they may request a formal review by RIPTA's Director of Paratransit. A review will be scheduled and a decision made within 10 days.

How Are We Doing?

Complaints and Compliments

We encourage you to let the The RIde Program know when you receive exceptional service and when your service is poor. If you wish to file a formal complaint or compliment about any aspect of our services, you may do so via:

1. E-mail at Rlde@ripta.com.

- 2. Our website, www.ripta.com.
- 3. Mail to:

RIde Customer Service 705 Elmwood Avenue Providence, RI 02907

4. Call us directly at (401) 461-9760.

When you call or write, please provide as much detail as possible, including date and time of pick up or drop off, vehicle number, driver name. The more information you include, the better we can research your complaint or pass along your compliment. We will follow up on your complaint and respond to you, usually within 10 days. Anonymous compliments and complaints also are accepted.

Accessible Transportation Advisory Committee

The Accessible Transportation Advisory Committee (ATAC) is an advisory body for riders, social service agency representatives, and others to provide input into all RIPTA services, including The RIde Program. The ATAC meets regularly to discuss and provide input to RIPTA. To become involved, call RIPTA at (401) 784-9500 ext. 1242.

Rider Surveys

We may also occasionally contact you as part of a random survey to ask you about the service you receive. This contact will occur only by telephone or US mail. You will never be asked for personal information, and you should not offer any personal information you do not wish to share. Survey participation is completely voluntary. If you answer our surveys, your name will never be used in any information we make public. The information we gather from you about our service is used to help us design new services or improve existing services. The RIde Program will never attempt to sell you any products or services.