TNC Driver's Training and Accessibility Plans: An Analysis

BY RUBY TUMBER GRADUATE STUDENT INTERN, SED



Driver's Training Programs

"TNCs shall establish a driving training program to ensure that all drivers are safely operating the vehicle prior to the driver being able to offer service. This program must be filed with the Commission within 45 days of the adoption of this decision."

 After reviewing submitted TNCs applications:
 NONE of the TNCs employ a formal driving school or certified instructor to teach drivers or to inspect vehicles.

A brief look at individual companies

- * Instantcab least stringent. Oblige by 19 point plan.
- * Rasier (Uber) gives a list of driving schools, but does not require attendance.
- * Sidecar option of 2 hour in-class course or Virtual Driving Program accessed remotely online.
- * Tickengo tests new drivers on safety knowledge and requires verification (certificate).
- * Lyft Driver education and driver training (with Lyft mentor) and option of continued training.

Commonalities

- All require drivers to be 21+ years of age and have a "clean" driving/criminal record.
- Vehicles must pass a 19 point plan.
- Most driver's education courses draw from DMV safety rules (e.g. *Rules of the Road* online video & other driver handouts).
- No certified professionals employed to teach driver's training or to perform the 19 point check.

Comparisons: Taxi Requirements

San Francisco MTA

- * New driver pre-screen
- * Driving school from City approved list
- * Certificate of completion
- * **Provisional permit** (probation period).

Others

- * Santa Monica DOT requires medical report to ensure drivers are physically able to drive for long-hours.
- for long-hours. Most DOTs require **fingerprint** background checks and drug tests.
- * Annual permit renewals (re-testing to ensure continued good driving).

Accessibility Plans

- Compared to creating driver's training guidelines, the
- TNCs did a better job at outlining accessibility plans, as mandated by 2013 Rulemaking Decision. The apps for all TNCS work to create platforms that are accessible to both iOS and Android interfaces, and utilize impaired technology, such as VoiceOver or speech-to-text, increasing operability and userability.
- Many (Lyft, Rasier, Sidecar, Tickengo) require drivers to specify utilities they provide, and nearly all use a drop-down or fill-in menu to designate needs (wheelchair, service animal, etc.)
- All have a no-tolerance, anti-discriminatory policy * Most allow service animals, unless a driver can't * accommodate (medical allergy, etc.)

Accessibility Plans: Plan on Avoiding Divide between Able and Disabled Communities

- * InstantCab –actively recruits drivers with accessible vehicles by providing incentives, such as reimbursing drivers for a portion of the cost of altering vehicles.
- * Tickengo –aims to launch a recruitment campaign for accessible vehicles and reduce commission paid to Tickengo for these drivers.
- * Instantcab –requires drivers to allow service animals, unless there is a medical/legitimate reason.
 Drivers who forbid service animals do not show up in the app of users who have a service animal.

Taxi Accessibility Requirements

- * Taxis are subject to ADA provisions against discrimination and must comply with accessibility requirements (42 U.S.C. §§ 12181-12189).
- * Taxi providers may not: discriminate against persons with disabilities by refusing to provide taxi services to individuals who use them, refuse to assist with the stowing of mobility devices, or charge differential fares with an individual with accessibility equipment and/or service animal.
- * However, taxi providers are not required to purchase or lease accessible automobiles. Therefore, it can be assumed that the pool of service providers with accessible vehicles is limited, given the area they serve. Unfortunately, there have been instances of cab drivers denying service to the disabled or visually-impaired, whether by individual drivers rebuffing service animals from entering their vehicles, or cab dispatchers ignoring requests for accessible vehicles.
- In some ways, TNCs may bridge the gap for visually or physically impaired customers.

"Anyone could buy a \$15 background check off the Internet that simply searches available online records. But not all court records in all states are online for the public. In fact, in San Francisco public records can only be retrieved in person at the courthouse. As a result, cheap, unofficial background checks can easily miss crucial information and prior convictions."

-PandoDaily, Jan. 6, 2014

"The UberX drivers we spoke to described the company's driver's safety program as perfunctory. Four of the drivers would talk to us only if we agreed to withhold their names, because they were either afraid their insurance companies would find out they drive commercially or they did not want to jeopardize their standing with UberX."

--KQED News, Feb. 20, 2014

Public and Media Critiques

Additional considerations

- Insurance and liability limitations:
 - Extend insurance coverage to include service animals Solidify requirements for when coverage begins.
- Penalties:
 - What are the penalties for reported "bad" drivers? How are cases investigated? Are drivers permanently or temporarily deactivated? What is the probationary period? These questions must be addressed in driver's manuals and service agreements.
- Receipts should include copy of zero-tolerance policy
- \circ Safetv:
 - In further rule-making, it may be advisable to require a state-certified driving school for training, or an automotive professional to check cars in 19 point inspection
 - This could mean asking TNCs to provide contract agreements with these third parties.
 - Employing someone who is certified to conduct an inspection.
 - Conduct on-going screening of driver's to maintain optimal safety levels, such as yearly tests, or performing random safety checks.
 - Utilize a single, trustworthy background check system using fingerprinting.

