

# ADA Paratransit

# Transportation Initiative Training

## Table of Contents

What is ADA Paratransit? .....	4
Eligibility Categories .....	7
Service Types .....	10
Eligibility Determination .....	14
Application Assistance .....	18
Appeals Process .....	21
Visitor Status & Non-Resident Eligibility .....	24
Companions & Personal Assistants .....	27
Scheduling Rides .....	30
Travel Training .....	33
Learning Stop Answers .....	36

# ADA Paratransit

In this workbook, you will learn the definition of ADA Paratransit, requirements and regulations, training opportunities, and more ADA Paratransit resources.

ADA Paratransit is a service available to individuals with disabilities when a city's fixed-route transit system does not meet the needs of the individual. ADA Paratransit is important for individuals with disabilities to fully participate in the community. As a result of the completion of this module, you will understand how to access ADA Paratransit for yourself or an individual you support.

It is recommended that you take notes, mark in this workbook, and re-read sections that may be confusing.

Throughout this course, there will be Learning Stops. Learning Stops are questions that provide an opportunity for the student to reflect on the course materials. At the end of each section, there will be one to five questions regarding the reading. These Learning Stops are a way to check your understanding. If you answer a Learning Stop incorrectly, go back and re-read the section to make sure you understand the content completely.

*ADA Paratransit training begins on the next page.*

# What is ADA Paratransit?

Learning Objective: define ADA Paratransit

# What is ADA Paratransit?

## Fixed-Route v. ADA Paratransit

Fixed-route transit systems operate on a set route and follow a fixed schedule.

Example: city bus

ADA Paratransit is an accessible alternative to fixed-route transit.

ADA Paratransit is an extension of a community's fixed-route bus system. Like the fixed-route system, ADA Paratransit is available for all purposes of travel - business, personal, and leisure.

### Requirements

- Service area must be the same as fixed-route service
- Hours of service must be the same as fixed-route service
- Fares cannot exceed twice the fixed-route passenger fare
- Reservation systems should allow for next-day service
- Restrictions may be placed on trip purpose

### Eligibility

Riders are eligible for ADA Paratransit if **they cannot independently use all or portions of the fixed-route service**, even if they would be able to use the fixed-route system with the help of a friend or personal attendant.

Eligibility for ADA Paratransit may not be limited to categories of trips. Federal Transit Administration (FTA) found that providing ADA Paratransit only for certain types of trips, such as dialysis, was in violation of the Americans with Disabilities Act.

*ADA Paratransit Training continues on following page.*

# What is ADA Paratransit?

## Learning Stop 1

Which of the following statements are true about ADA Paratransit?

- A.** ADA Paratransit is a service that corresponds to the fixed-route bus system provided in a city.
- B.** Individuals are eligible for ADA paratransit service if they cannot independently use all or portions of the fixed-route service.
- C.** ADA Paratransit may be used to travel to work, to health care appointments, and to recreational activities.
- D.** All the above.

# Eligibility Categories

Learning Objective: describe eligibility categories for ADA Paratransit Service

# Eligibility Categories

## Category 1 Eligibility

**Definition:** Any individual with a disability who is unable, as the result of a physical or mental impairment (including a vision impairment), and without the assistance of another individual (except the operator of a wheelchair lift or other boarding assistance device), to board, ride, or disembark from any vehicle on the system which is readily accessible to and usable by individuals with disabilities. [Section 37.123(e)(1)]

### Examples:

**Example 1:** A person with a cognitive disability who may not be able to: plan the trip, identify the correct bus number, recognize destinations, or make transfers from one route to another.

**Example 2:** A person with a visual impairment who may have difficulty traveling to unfamiliar places.

**Example 3:** A person with a physical limitation who cannot stand on a moving bus when all seats are taken.

## Category 2 Eligibility

**Definition:** Any individual with a disability who needs the assistance of a wheelchair lift or other boarding assistance device and is able, with such assistance, to board, ride, and disembark from any vehicle which is readily accessible to and usable by individuals with disabilities if the individual wants to travel on a route of the system during the hours of operation of the system at a time, or within a reasonable period of such time, when such a vehicle is not being used to provide designated public transportation on the route. [Section 37.123(e)(2)]. **A rider is eligible under Category 2 for paratransit service if the fixed route they travel on is not accessible based on either the vehicle or the stops causing an issue with the vehicle's equipment.**

### Examples:

**Example 1:** A broken lift on the bus that serves a route.

**Example 2:** A stop on the route creates obstacles, such as terrain or construction, which prevent the safe deployment of the bus equipment.

## Category 3 Eligibility

**Definition:** Any individual with a disability who has a specific impairment-related condition which prevents such individual from traveling to a boarding location or from a disembarking location on such system. [Section 37.123(e)(3)]. **A person is eligible for paratransit service under Category 3 when architectural or environmental factors create obstructions to accessibility.**

### Examples:

- Lack of curb ramps or reasonable alternative path of travel
- Lack of sidewalks or alternative safe accessible path of travel
- Distance from the stop/station to the trip origin or destination
- Steep terrain
- Snow and/or ice
- Extremes in temperature
- Major intersections or other difficult-to-negotiate street crossings
- Temporary construction



# Eligibility Categories

## Learning Stop 2

Choose the correct ADA Paratransit eligibility category:

A route with stops lacking curb ramps or a reasonably safe path of travel.

Category 1

Category 2

Category 3

## Learning Stop 3

Choose the correct ADA Paratransit eligibility category:

A route where a bus lift cannot be used due to a city construction project.

Category 1

Category 2

Category 3

## Learning Stop 4

Choose the correct ADA Paratransit eligibility category:

A rider with an intellectual disability who is unable to safely navigate a busy intersection.

Category 1

Category 2

Category 3

*All Learning Stop answers can be found on page 36.*

# Service Types

Learning Objective: Explain  
ADA Paratransit service types

# Service Types

## Types of Eligibility

There are three types of ADA Paratransit eligibility:

Unconditional  
Eligibility

Conditional  
Eligibility

Temporary  
Eligibility

## Unconditional Eligibility

Unconditional eligibility provides paratransit service for all trips. A rider is granted unconditional eligibility when it is not reasonable to use the fixed route service **under any circumstances**.

**Example:** Patrick is a former firefighter who has difficulties with cognition and emotional self-regulation following a traumatic brain injury he suffered in an explosion. Patrick is approved for ADA Paratransit under Category 1 and is granted unconditional eligibility as he must use paratransit service for all trips.

Patrick volunteers three days per week at the Fraternal Order of Firefighters. ADA Paratransit service enables him to make the trip to the center independently.

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## Conditional Eligibility

Conditional eligibility provides paratransit service on some, but not all, trips. A rider is granted conditional eligibility when they may reasonably be expected to make some trips on the fixed-route service independently, but not all trips. Not all paratransit riders require paratransit service for every trip. Of all paratransit riders, 30-45% require paratransit service only under certain conditions.

To determine an individual as conditionally eligible, **all conditions** that affect travel must be considered. In ADA compliance reviews, the Federal Transit Administration concluded that some transit providers did not adequately consider path-of-travel barriers, weather, and other possible issues when setting conditional eligibility determinations.

**Example:** Mara rides the city bus to the community college where she teaches. Mara has a chronic health condition called Multiple Sclerosis (MS). During MS flare-ups, Mara experiences physical challenges. Her usual bus route is not accessible at these times due to the distance from the bus stop to her building. Mara's building is also at the top of a hill. Mara is approved for ADA Paratransit under Category 3 and **granted conditional eligibility**. At times she will ride the fixed route system, and other times use ADA Paratransit.

Accessible  
to All

Prior to the passage of the ADA, many disability activists worked tirelessly for a system accessible to all- not segregated systems. Choosing the fixed-route transit system whenever possible ensures our city bus systems are integrated and have sustainable ridership.

*ADA Paratransit training continues on the next page.*

# Service Types

## Temporary Eligibility

The ADA permits temporary eligibility for people with disabilities that prevent them from using the fixed-route system for a limited period.

**Example #1:** Leo is using paratransit under temporary eligibility following surgery. Leo plans to resume driving once he is recovered.

**Example #2:** Gwen is awaiting surgery for meningioma, a benign brain tumor. Due to frequent seizures until her surgery, she uses paratransit under temporary eligibility.

# Service Types

## Learning Stop 5

Match the example with the correct ADA Paratransit eligibility category:

Kim is a fitness fanatic who uses a manual wheelchair. Kim travels all over the city, with some routes more accessible than others.

Unconditional

Conditional

Temporary

## Learning Stop 6

Match the example with the correct ADA Paratransit eligibility category:

Nadjema, a young woman in a temporary body cast following an automobile accident.

Unconditional

Conditional

Temporary

## Learning Stop 7

Match the example with the correct ADA Paratransit eligibility category:

Earl lives in an assisted care center. His intellectual disability presents daily challenges with safety and independent living.

Unconditional

Conditional

Temporary

*All Learning Stop answers can be found on page 36.*

# Eligibility Determination

Learning Objective: Describe the eligibility determination process for ADA Paratransit

# Eligibility Determination

Transit agencies should develop a comprehensive list of skills needed and tasks required to use the fixed-route service.

## Task List

Tasks required to access the fixed-route transit service with a reasonable level of effort and risk, such as:

- going to and from the stop
- going throughout the service area
- traversing various surfaces

A rider must be able to perform the tasks under a variety of conditions, such as:

- low or bright light
- snow, ice, rain, heat
- background noise
- interruptions or distractions

## Functional Evaluation

The ADA Paratransit application process may include functional evaluation or testing applicants. An evaluation may observe an applicant attempting to perform functional tasks that simulate a fixed-route trip, such as: climbing steps, crossing a street, walking a measured course, and taking cognitive tests.

### Physical Factors:

- Walking Speed
- Balance
- Endurance
- Coordination
- Strength
- Range of Motion
- Dexterity

### Cognitive Factors:

- Orientation to person, place, and time
- Short- and long-term memory
- Ability to stay on task
- Ability to seek and act on directions
- Problem solving
- Ability to process information
- Behavioral skills

### Sensory Factors:

- Directional Wayfinding
- Ability to detect changes in surface
- Ability to detect/hear environmental cues
- Ability to self-regulate following jarring sensory input

**Other Factors:** some disabilities cannot be evaluated by functional assessments, such as seizure disorders and psychiatric disabilities. These conditions may rely on other forms of documentation for eligibility determination.

### Safety & Safety Skills

Public safety is not a consideration in determining ADA Paratransit eligibility. A route that travels through a high-crime-rate area is not considered an eligibility factor; however, personal safety skills must be considered in eligibility determinations.

### Age Limits

Age limits imposed to use paratransit service must be in line with age limits on the fixed-route system.

The FTA identified instances where children under a certain age were not allowed to travel alone on paratransit, whereas similar limitations were not made on the fixed-route system. Age limitations **must be consistent** across fixed-route and ADA Paratransit systems.

*ADA Paratransit Training continues on the next page.*

# Eligibility Determination

## Supporting Documentation

Applicants may provide any information or documentation that will help to show that they are eligible because they cannot use the fixed-route system. Include information on any secondary conditions, such as:

- disorientation
- fatigue
- difficulties with balance

Think about the variety of environments across different routes.

## Examples of Documentation

**Documentation from Community Supports:** a detailed statement from a disability service provider, independent living specialist, rehabilitation counselor, support broker, case manager, employment support specialist, or other support person.

**Medical Documentation:** a detailed statement from a medical professional - a physician, psychologist, mental health therapist, occupational therapist, physical therapist, or counselor.

The statement should explain how the disability prevents the applicant from using the fixed-route system.

## Examples of Accessibility Barriers:

No curb cuts

No sidewalks

No pedestrian signals

Lack of snow removal

Hilly terrain

Extremely busy intersection with fast "walk/don't walk" cycle

Weather that makes negotiating the distance impossible



# Eligibility Determination

## Learning Stop 8

TRUE

OR

FALSE

The ADA Paratransit application process may include functional evaluation or testing of applicants.

## Learning Stop 9

TRUE

OR

FALSE

An applicant who can ride fixed-route service in good weather may be eligible for ADA Paratransit service when snow is a factor.

## Learning Stop 10

TRUE

OR

FALSE

An applicant with a psychiatric disability may be eligible for ADA Paratransit service.

## Learning Stop 11

TRUE

OR

FALSE

Where a city bus system allows children over the age of 12 to ride independently, the ADA Paratransit service must follow the same age guidelines.

# Application Assistance

Learning Objective: Describe application assistance for ADA Paratransit

# Application Assistance

An applicant who has an in-person interview or functional assessment and may need help can bring an assistant. This person could be a friend, family member, advocate, service provider, lawyer, therapist, or other individual.

An applicant who does not have natural supports in the community may be able to get assistance from a Center for Independent Living or other disability agency.

## No Fees in Eligibility Determination

The process to determine paratransit eligibility may not require any fees or impose any charges. If the eligibility determination process requires any in-person interviews or assessments, the transit agency must provide paratransit without charge. This includes trips to obtain photo IDs that may be required to use the service.

## 21 Day Determination

A timely decision on paratransit eligibility is set at 21 days from the time an individual submits a completed application. If the transit agency has not made an eligibility determination within 21 days, paratransit service is to be granted until the eligibility determination is complete.

The FTA reports that one of the most frequent eligibility-related paratransit violations is that transit agencies do not inform applicants that they have a right to service if eligibility decisions take longer than 21 days.

## Recertification

A transit agency may require recertification of eligibility at reasonable intervals.

# Application Assistance

## Learning Stop 12

TRUE

OR

FALSE

A two-page verification form to be completed by a doctor at the rider's expense is a reasonable eligibility requirement.

## Learning Stop 13

TRUE

OR

FALSE

A paratransit provider may require a rider to conduct an in-person functional evaluation, if they provide transportation and the evaluator.

## Learning Stop 14

TRUE

OR

FALSE

After 21 days, a paratransit applicant is entitled to use the service until the completion of the eligibility determination.

# Appeals Process

Learning Objective: Describe the appeals process for ADA Paratransit denial

# Appeals Process

## Denial or Limitations of Eligibility

If eligibility is denied or limited, written documentation must provide the reasons in detail. Applicants need to know the specific observations made or the answers to questions that led to the denial.

The FTA states that applications that are incomplete or improperly completed may not be processed as a denial. An "incomplete" letter should be sent, rather than a letter stating ineligibility. Effort should be made to assist the rider in completing the eligibility process correctly.

## Eligibility Appeal

The appeal process must include an opportunity to be heard and to present information and arguments. If the applicant who was denied eligibility needs transportation to the appeal hearing, the transit agency must provide it.

### Appeal Timeline

The transit agency may require that appeals be filed within 60 days of the eligibility denial. If this deadline is missed, the applicant may reapply for eligibility and enter the eligibility determination process again.

### Appeal Review

An appeal must be decided by a person or panel who was not involved with the original denial. The ADA regulation requires a separation of authority between the individual who issued the original denial and those deciding on the appeal.

**Example:** neither a subordinate nor supervisor of the original decision maker may hear eligibility appeals.

## Assistance with Denials

### Your states' Protection and Advocacy Agency

Kentucky Protection & Advocacy:  
[www.kypa.net](http://www.kypa.net) or 1-800-372-2988

### Your local Center for Independent Living

<https://silc.ky.gov/Pages/Centers-for-Independent-Living.aspx>

## Filing an ADA Complaint

If a local appeal is denied, and there is concern the ADA Paratransit eligibility process was inappropriate or unfair, a complaint may be filed with the FTA. Information, forms, and instructions on the ADA Complaint process can be found on the FTA website at:

[www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/fta-civil-rights-complaint-form](http://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/fta-civil-rights-complaint-form)

# Appeals Process

## Learning Stop 15

TRUE

OR

FALSE

An appeal must be heard by the same person/committee who issued the denial.

## Learning Stop 16

TRUE

OR

FALSE

An applicant who has been determined ineligible may not submit a new application.

## Learning Stop 17

TRUE

OR

FALSE

A denial letter may be sent to an applicant who has submitted an incomplete or improperly completed application.

# Visitor Status & Non-Resident Eligibility

Learning Objective: Describe visitor status  
and non-resident eligibility



# Visitor Status & Non-Resident Eligibility

## Visitor Status

When a person is eligible for ADA Paratransit service in one community, they can use ADA Paratransit service in other cities under "Visitor" status.

Remember, ADA Paratransit is service that corresponds to a fixed-route bus system. A community that does not offer a city bus system will not be able to offer ADA Paratransit services.

### Example: Hugo

Hugo, who is deaf and visually impaired, is an ADA Paratransit user in Paducah, Kentucky. Hugo visits Frankfort, Kentucky for a disability advocacy event. He uses ADA Paratransit while in Frankfort.

When Hugo is a visitor in cities that do not have a city bus system, he does not have access to the ADA Paratransit system.

## Visitor Status

A visitor presenting documentation of ADA Paratransit eligibility elsewhere must be treated as eligible. A rider must present:

Rider ID Card

&

Eligibility Letter

Visitor status is good for up to 21 days of use in a given location per year. Visitors who wish to continue use of ADA Paratransit service beyond 21 days may apply for **non-resident eligibility**.

## Non-Resident Eligibility

A person does not have to live within the community in order to use paratransit services. Anyone can apply to use ADA Paratransit within a service area through "**Non-Resident Eligibility**." Applications for non-residents must be processed just like those of area residents.

### Example: Maya

Maya is a high school student who enjoys competing in 5K races in her wheelchair. Maya lives in a small town in Eastern Kentucky that does not have a city bus system or ADA Paratransit service. Maya's mom and step-dad help her apply for ADA Paratransit non-resident eligibility in a nearby city.

During summer break, Maya's parents bring her to a city that offers ADA Paratransit. Maya gets comfortable using the service independently. Upon graduation, Maya plans to leave home to attend college in a city that offers public transportation.

# Visitor Status & Non-Resident Eligibility

## Learning Stop 18

TRUE

OR

FALSE

ADA Paratransit service is only available in locations that have a city bus service.

## Learning Stop 19

TRUE

OR

FALSE

A person who uses ADA Paratransit in one city can use their rider ID to schedule rides in another city as a visitor.

## Learning Stop 20

TRUE

OR

FALSE

You must legally reside in a community to be eligible to use the ADA Paratransit service there.

# Companions & Personal Attendants

Learning Objective: Explain policy  
regarding guests and personal attendants

# Companions & Personal Attendants

## Guests

Any eligible paratransit rider may ride with a guest or companion. A guest riding on paratransit would pay the same fare as the eligible rider. When scheduling a trip, the guest should be planned for to ensure room on the bus or van.

### Example: Ashley

Ashley uses ADA Paratransit in Richmond, Kentucky. She invites her friend Maria to visit her apartment and go out to a movie. Ashley schedules the ADA Paratransit trip and notes she will have one guest traveling with her. **Both Ashley and Maria will pay the usual city fare.**

## Personal Care Attendants

Any eligible paratransit rider may be accompanied by a personal care attendant on any trip when assistance is needed. The need for the personal care attendant may occur **during the ride or at the destination.**

A rider should indicate on their ADA Paratransit application that they may sometimes travel with a personal attendant. A personal care attendant **may not be charged any fare.**

### Examples of Personal Care Attendants

An employee of the rider, a family member, or a friend

Another person with a disability

A child may also serve as a personal care attendant

Even young children can assist in many ways during a trip, such as in opening doors, carrying packages, or as a language interpreter. **There is no age requirement to qualify as a personal attendant.**

### Example: Garnet

Garnet attends an autistic self-advocacy meeting. She rides ADA Paratransit with her personal care attendant. Garnet pays an individual fare and the personal care attendant rides at **no additional cost.**

### Guest & Personal Care Attendant

A rider may travel with both one guest and one personal care attendant. In this case, the rider would pay a fee, the guest would pay a fee, and the personal care attendant fee would be waived. A rider should plan for both the personal care attendant and guest when scheduling trips to ensure room on the bus or van.

### Example: Liv

Liv makes plans to go on a date with a fellow veteran she met at the Veterans Center. Liv will need assistance in going to the restroom during the date. Liv's personal care attendant will provide this assistance - not her date. Liv schedules an ADA Paratransit ride for herself, one guest, and one personal care attendant.

A rider who needs a personal attendant on some trips cannot be required by the transit agency to bring an attendant on every ride. In compliance reviews, the FTA found instances of transit agencies requiring riders who use a personal attendant to always travel with an attendant. This may not be required.

# Companions & Personal Attendants

## Learning Stop 21

TRUE

OR

FALSE

An ADA Paratransit rider bringing a guest passenger should give notice when scheduling a ride for space planning purposes.

## Learning Stop 22

TRUE

OR

FALSE

If an ADA Paratransit rider schedules a guest, the guest must serve as the personal care attendant.

## Learning Stop 23

TRUE

OR

FALSE

A personal care attendant must be 18 or older and have agency certification.

# Scheduling Rides

Learning Objective: Describe the scheduling process for ADA Paratransit

# Scheduling Rides

## Negotiating Ride Times

The ADA allows a transit agency to negotiate pickup times, but the transit agency cannot require the rider to accept a trip more than one hour before or after the needed departure time. This is called **the scheduling or negotiating window**.

## Comparable Service

The goal of ADA Paratransit is to provide accessible service that is comparable to the fixed-route system.

Negotiating a 4pm pickup knowing that a rider works until 5pm would not be comparable service.

Offering a 9am pickup time for a rider who has an appointment at 8am would not be comparable service.

## Scheduling Window

When there is a latest arrival time (for example, arrival to work), the scheduling window should be used on the early side to ensure that the rider arrives on time. When there is an earliest departure time on a return trip (for example, a doctor's appointment), the scheduling window should be from that time to one hour after.

### Example: James

James gets off work at 5pm, changes out of his uniform, and often chats with co-workers after his shift ends. James requests pickup at 5:15pm to ensure that he is ready. James is given a pickup window of 5:15pm–5:45pm.

## Scheduling Changes

If a transit agency wants to change the originally-negotiated time (for example, to maximize driver schedules), riders should be called for a new time to be negotiated. If a rider cannot be reached to re-negotiate the pickup time, the original time should not be changed. Per the ADA scheduling window, any changes may not be more than one hour from the rider's requested time.

### Driver's Manifest

The agreed-upon time should appear on the driver's manifest.

## Travel Time

To determine if ADA Paratransit travel time is excessive, the FTA looks to the travel time of the corresponding fixed-route system. ADA Paratransit is to be comparable to the fixed-route public transportation system. ADA Paratransit is the accessible counterpart to the public bus system. ADA Paratransit cannot operate under the same time and convenience factors as private transportation. Private transportation options, such as owning a vehicle, taking a taxi, or using services like Uber or Lyft are more convenient for the user; however, they are also more costly.

### Travel Time Parameters

The FTA recommends that paratransit agencies implement a graduate travel time parameter. For example: 30 minutes for trips under 3 miles, 45 minutes for trips that are 3–5 miles, 60 minutes for trips that are 5–7 miles, etc..

# Scheduling Rides

## Learning Stop 24

**TRUE**

OR

**FALSE**

ADA Paratransit operates within time parameters equivalent to a taxi service.

## Learning Stop 25

**TRUE**

OR

**FALSE**

A pickup window of 60 minutes is considered excessively long.

## Learning Stop 26

**TRUE**

OR

**FALSE**

A rider should state the appointment time (for example, the start of a movie) when scheduling ADA Paratransit.



# Travel Training

Learning Objective: Describe fixed-route bus system travel training

# Travel Training

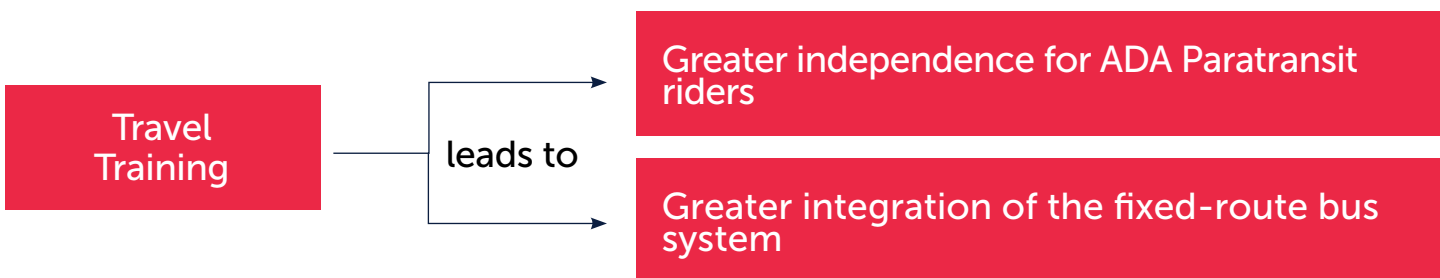
## Travel Training

Travel Training is a service provided by a fixed-route bus system. Travel Training provides direct instruction and individual training to enable a person with a disability to ride a fixed-route transit system independently. Participation is voluntary. A person **cannot be required to participate** in travel training.

Typically, training is provided for trips that individuals make frequently, such as to work or school. This service provides an ADA Paratransit rider with the training and practice to travel a given route with greater independence. Riders who have successfully completed travel training on frequently traveled routes **maintain ADA Paratransit eligible** for those routes on which they have not been trained.

The FTA determined that riders who receive travel training **may not be asked to give up eligibility** for other ADA Paratransit services. Incentives to ride fixed-route service **may not include forfeiting paratransit eligibility**.

Travel Training allows a rider to develop new skills, gain independence, and travel in the least restrictive setting.



# Travel Training

## Learning Stop 27

TRUE

OR

FALSE

An ADA Paratransit rider may be encouraged to participate in travel training on the fixed-route system.

## Learning Stop 28

TRUE

OR

FALSE

Receiving travel training to enable a rider to use fixed-route transit from home to workplace would cause a rider to lose ADA paratransit eligibility on other routes.

## Learning Stop Answers

1. D.
2. Category 3
3. Category 2
4. Category 1
5. Conditional
6. Temporary
7. Unconditional
8. True
9. True
10. True
11. True
12. False
13. False
14. True
15. False
16. False
17. False
18. True
19. True
20. False
21. True
22. False
23. False
24. False
25. True
26. True
27. True
28. False