

ADA Policy

Demand Responsive Service

_Greenville Transit System
Americans with Disabilities Act of 1990
(ADA) ADA Policy and Demand Response
Service Procedures

Date 06/10/2020

Introduction and Purpose:

This ADA policy is written to establish operating and service guidelines and procedures for the implementation of the requirements of the American with Disabilities Act of 1990 (ADA), the U.S. Department of Transportation regulations for implementing ADA (49 CFR Parts 27, 37 and 38), and applicable Ohio laws and regulations.

The Greenville Public Transit System (GTS) operates Curb-to-curb service, with door to door upon demand. GTS complies with ADA requirements with respect to such services.

Service Classifications:

The curb-to-curb service with door-to-door upon demand service is offered to all members of the public, not just persons with disabilities, therefore the service is considered "demand response" and Greenville Transit System is not required to provide ADA complementary paratransit service.

Policy Statement: It is the policy of Greenville Transit System to comply with all the legal requirements of Federal and State laws and regulations as they pertain to individuals with disabilities. The transit system provides quality transportation services without discrimination to all persons including individuals with disabilities. Discrimination on the basis of disability against any person by transit system employees will not be condoned or tolerated.

Goals: Service is provided in a manner that meets the following goals.

1. Provide safe, accessible, and dignified services to all persons, including individuals with disabilities.
2. Expedite the safe and efficient boarding, securing, transporting and alighting of all passengers, regardless of mobility status.
3. Accommodate the wide range of mobility aids within the confines of available vehicles and commercial standard equipment.
4. Minimize potential damage to mobility aids and transit system equipment in the process.

Applicability: This policy applies to all transit system employees, and all employees providing service through a Service Provider (Contractor). This policy applies to services, facilities and vehicles. It applies equally to all persons needing and/or using the services provided by the system.

Definitions:

Three or Four Wheeled Device (formerly common wheelchair): A mobility aid belonging to any class of three or four-wheeled devices, usable indoors, designed for and used by individuals with mobility impairments, whether operated manually or powered.

Commuter Service: Vehicle is operated along a prescribed route according to a fixed schedule. Service is predominantly in one direction during peak periods, with limited stops, and routes of extended length, usually between the central business district and outlying suburbs. Or characterized by limited route structure; limited stops, and coordinated relationship to another mode of transportation.

Disability: An individual with a disability is defined by the ADA as a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment. A physical or mental impairment that substantially limits one or more major life activities.

Fixed Route Service: Vehicle is operated along a prescribed route according to a fixed schedule.

Mobility Aid/Non Wheelchair Mobility Device: A device used by a person with a mobility impairment to assist with mobility but does not meet the requirements of a three or four wheeled device as defined by ADA. These include but are not limited to canes, crutches, and walkers when used by a person with a mobility related disability.

Demand Response Service: A transportation service characterized by flexible routing and scheduling of relatively small vehicles to provide point-to-point transportation. These services usually require advance reservations and can be curb-to-curb or door-to-door. Can also be referred to as paratransit or dial-a-ride service.

Securement Equipment: Equipment used for securing "common wheelchairs" against uncontrolled movement during transport.

Securement Station: Space specifically designed to secure and stabilize "common wheelchairs" on transit vehicles.

Service Animal: Animal that is trained to perform a task or tasks for people with a disabilities.

General Guidance and Procedures for Implementing Policy

Recruitment and Employment: As stated in the transit systems personnel policies, the agency is an Equal Opportunity Employer and fully complies with ADA in its recruitment, hiring and continued employment practices.

Facility and Vehicle Accessibility: The transit system administrative facility, passenger facilities and vehicles shall meet or exceed the requirements of 49 CFR Parts 27, 37 and 38 and the State of Ohio. All vehicles purchased for commuter and deviated route service will be accessible.

Maintenance of Accessible Features: Accessibility features on vehicles, including lifts, wheelchair securement devices and public address systems, will be maintained in operative condition. The preventive maintenance program of Greenville Transit System provides for regular and frequent maintenance checks of these features as well as preventive maintenance as recommended by the equipment manufacturers. In addition, the lift must be cycled as part of each pre-trip inspection.

Drivers are required to report lift failures as soon as possible. Vehicles with inoperative lifts will be replaced as soon as possible.

Boarding: Drivers and scheduling practices will provide adequate time for a passenger with a disability to board and/or disembark the vehicle, which includes adjusting the schedule if necessary to accommodate slower passengers and waiting for passengers to be seated before moving the vehicle. It is the responsibility of the driver to determine the safest location for passenger boarding based on conditions and individual needs upon arrival at the pick-up site. The passenger and/or their guest escort or attendant will maneuver the passenger and mobility aid to the vehicle. Only a properly trained transit system employee can operate the lift, secure the "common wheelchair" on the lift and in the securement station.

Use of Accessibility Devices by Persons with Disabilities Not Using a Wheelchair: A person with a disability who is not using a wheelchair or other seated mobility aid may use the lift to board or alight the vehicle upon request.

Priority Seating: With the exception of the wheelchair securement stations, the transit system does not require any passenger to sit in designated seating. However, this does not supersede the transit system's right to require any passenger who has caused a disruption in the safe travel of other passengers and/or driver to be required to sit in a specific area of the vehicle as a condition of transportation.

Priority seating for people with disabilities is designated by permanent signage in each vehicle. In cases where a person with a disability requests use of priority seating that currently occupied by

another passenger, the driver will ask that passenger to allow the person with a disability to use of the seat.

Driver Assistance: Drivers will make themselves available for assistance to persons with disabilities and will assist upon request of the passenger. Drivers will leave their seat to assist a passenger with using the vehicle ramp, lift and/or securement systems. Drivers will use the accessibility-related equipment and features on their vehicles.

Securement: Securement of the “common wheelchair” class of mobility devices is the responsibility of the driver and drivers will be trained in the proper operation of all securement equipment based on manufacturer specifications. Greenville Transit System policy states drivers should not allow a passenger to ride if they are not secured properly unless the securement system will not accommodate the common wheelchair. If the tie-down system is not compatible for the common wheelchair the passenger is using, the driver will still make an attempt to safely secure the wheelchair. If the wheelchair can not be secured because of the wheelchair design, the passenger **still has the right to ride the vehicle**. Drivers cannot deny a passenger a ride based on the inability to secure the common wheelchair. However, drivers must warn the passengers of the danger of riding in a non-secured wheelchair. Passengers who refuse to allow their wheelchairs to be secured may be denied service. Drivers must secure wheelchairs in the designated securement area only, even if the passenger wants their mobility device to be secured in a non-designated area.

Greenville Transit System will treat all riders equally. Seat belts and shoulder harnesses are recommended for passengers riding in the secured wheelchair station. Yet, not required unless required for all passengers.

Non-Standard Mobility Devices: Mobility devices that are not common wheelchairs will be accommodated to the extent that the ADA-compliant lift and securement areas can safely do so. However, these devices are the responsibility of the individual passenger, and must be secured in a manner that does not interfere with the safe operation of the vehicles and the transport of other passengers.

Accommodation of Portable Oxygen: Individuals are allowed to travel with respirators and portable oxygen supplies on board, consistent with applicable U.S. Department of Transportation rules on the transportation of hazardous materials.

Transfer to Fixed Seating: All passengers using seated mobility devices have an option of transferring to fixed seating once on board the vehicles. Drivers may recommend, but never require, users of seated mobility devices to transfer to fixed seating.

Service Animals: In compliance with 49 CFR Part 37, the transit system allows trained service animals to accompany passengers with disabilities. The driver will not ask for proof of the qualifications of the animal, but may ask what tasks the animal has been trained to perform.

However, any animal which is not under the passenger's control or which becomes a threat to other passengers may be restricted from riding.

Alighting: It is the responsibility of the driver to determine that the location for passenger alighting is safe. However, the driver will allow a passenger who uses the lift to disembark at any stop, unless the lift cannot be deployed, the lift will be damaged if deployed, or conditions at the stop would present unsafe conditions for all passengers. The driver will only unsecure the "common wheelchair" and operate the lift to return the passenger to the ground level. The passenger and/or their guest, escort or attendant must maneuver the passenger mobility aid once it has completely exited the vehicle.

Staff Training: All drivers and transit system staff are trained to proficiency in use of accessibility equipment, the operating policies related to each of the service requirements described, and in properly assist and treat individuals with disabilities with sensitivity. Mechanics are also trained to properly maintain lifts and other accessibility equipment.

Announce Stops: All drivers and transit system staff will announce time point stops and where multiple routes are served operators will provide verbal, external route identification announcements. Operators will also announce all stops or specific stops if requested by the customer.

Rider Information- Alternative Formats: All printed informational materials are made available in **accessible formats** upon request, for example, large print for persons with low vision or audio for blind persons, as well as accessible electronic formats.

Complaint Procedure: All complaints of discrimination on the basis of disability will be promptly and objectively investigated by the Director & General Manager and forwarded to the Board of Directors. Corrective or disciplinary action will be taken for behavior prohibited by this policy, up to and including termination of employment. (*Attachment A*)

Reasonable Modification of Policy: If a passenger requires modification of any of these policies to accommodate their disability, they may request such a modification by contacting Greenville Transit System's Public Transportation Director at 937-547-1811 or The General Manager at 937-548-0437. The transit system will make every attempt to work with the individual to find an accommodation solution.

The rider will be assigned a pick-up time. Riders will be required to travel to the curb outside of their trip origin in time for their scheduled pick-up. Vehicles operating on route deviation service will be unable to wait for a passenger who is not at the designated stop on time.

Passenger Assistance: Demand Response services will be provided on a curb-to-curb basis with door-to-door upon request basis. Greenville Transit System drivers will assist riders with disabilities in boarding and disembarking from vehicles and in securing their mobility devices. All drivers who operate Demand Response services are proficiently trained in passenger assistance and sensitivity towards persons with disabilities.

Fares: Specific to the System. Greenville Transit System fares are \$3.00 for general public within the city limits and \$1.00 per mile for county service from point A to point B. Children under 5 ride free with a paying adult and children 5-17 ride for \$1.00 with paying adult. Riders over 65 or with a eligible disability on file will receive ½ price fare of \$1.50 within the city limits.

Inoperative Lifts: Vehicles with inoperative lifts will be taken out of service as soon as possible and inoperative equipment will be replaced promptly with spare vehicle. The inoperative lift will be repaired before the vehicle returns to service. In the interim, Greenville Transit System will provide demand-response transportation using a back -up vehicle.

Eligibility Certification: There is no eligibility certification process at Greenville Transit System because the service is demand response and is open to the general public not just persons with disabilities.

Attachment A: ADA Complaint Form

Greenville Transit System ADA Complaint Form

Instructions: Please fill out this form completely, sign, and return to the address on Page 3.

Section I: Complainant Information

Name:

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Address:

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Phone Number:

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Email Address (Optional):

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Section II: Third Party Complaint Information

If you are filing this complaint on your own behalf please skip to Section III.

If you are filing this complaint on behalf of someone else, please complete this section.

Name of the person you are filing the complaint for:

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Address of the person you are filing the complaint for:

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Phone number of the person you are filing the complaint for:

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Section III: Information About the Event

Date and Time (If known) of the Occurrence:

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Describe the event and include the name(s) where possible for the individuals who were involved, including any witnesses:

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Have you filed a complaint with a Federal Agency, Federal Court, State Court, State Agency, or any other local agency?

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If yes, please list the Agency Name, Address, Phone Number, and Contact Person:

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Signature:

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Date:

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Return this form and any other supporting documents to:
Greenville Transit System
Attn: Erin Kies, Public Transportation Director
1425 Kitchenaid Way
Greenville, Ohio 45331

If you have any questions regarding this form please contact the Public Transportation Director:
Telephone: 937-548-0437
Fax: 937-548-1704
Email: ekies@cityofgreenville.org

Regulations 49 CFR Parts 27, 37 and 38

http://www.fta.dot.gov/12876_3906.html

