

ADA POLICY MCDONOUGH COUNTY PUBLIC TRANSPORTATION

Purpose Statement

This policy covers both regular transit and paratransit service for persons with disabilities, the elderly and general public provided by the McDonough County Public Transportation System (hereinafter referred to as "MCPT"). The purpose of the ADA service of the MCPT is to provide safe, reliable and courteous service to all persons in Macomb and McDonough County who are in need of public transportation assistance. This policy covers the following types of service provided by MCPT: curb-to-curb service for those disabled persons, elderly persons and members of the general public capable of utilizing the fixed route bus system; complementary paratransit service for those disabled persons who are determine eligible for such service because they are not capable of utilizing the fixed route bus system; and door-to-door demand response service for all other disabled persons, the elderly and the general public. This policy is applicable to all ADA regular and complementary paratransit services provided by the MCPT and includes the following transportation service providers: Durham School Services (modified fixed route service for persons with disabilities and demand response service for the elderly, disabled and general public), and Go West Transit (fixed route bus service for the elderly, disabled and general public).

Service Type

1. Curb-to-Curb Fixed Route Bus Service:

- Curb-to-curb service means that the MCPT transit vehicle will stop at the curb for passenger pick-up and delivery.
- MCPT drivers will be responsible for assisting disabled and elderly passengers in boarding and disembarking transit vehicles in a reasonable manner, but are not responsible for assisting passengers to and from residences or other buildings.
- All transit vehicles will be equipped with mobility device lifts/ramps and securement systems, and drivers will be proficient in their use.
- Adequate time will be given for individuals to board or disembark transit vehicles.

2. Door-to-Door Demand Response Service:

- Door-to-door service means that a MCPT driver will assist a disabled or elderly passenger from the door to the transit vehicle and will assist the elderly or disabled passenger back to the door in a safe and polite manner on the return trip.
- All transit vehicles will be equipped with mobility device lifts/ramps and securement systems, and drivers will be proficient in their use.
- MCPT drivers will assist disabled and elderly passengers in loading and unloading up to six regular size grocery or shopping bags (up to 20 pounds per bag) to and from transit vehicles and will assist elderly and disabled passengers in

carrying grocery or shopping bags from stores to transit vehicles and from transit vehicles to their residences.

- A MCPT driver will only assist an elderly and disabled passenger in going up or down steps or a ramp when it is determined by the driver to be safe for both the passenger and driver.
- Adequate time will be given for individuals to board or disembark transit vehicles.

3. Door-to-Door Complementary Paratransit Service:

- Door-to-door service means that an MCPT driver will assist a disabled passenger from the door to the paratransit vehicle and will assist the disabled passenger back to the door in a safe and polite manner on the return trip.
- Eligibility for this service is determined based on an application process.
- ADA complementary paratransit service will be provided, at a minimum, on a next-day basis.
- Eligible passengers may call anytime during regular business hours to request a trip for anytime that service is provided for the next day. A pickup must be scheduled and provided within one hour before or after the requested pickup time.
- MCPT will not restrict or prioritize trip purposes for eligible ADA complementary paratransit passengers.
- A MCPT driver will only assist a disabled passenger in going up or down steps or a ramp when it is determined by the driver to be safe for both the passenger and the driver.
- MCPT drivers will assist disabled passengers in loading and unloading up to six regular size grocery or shopping bags (up to 20 pounds per bag) to and from paratransit vehicles and will assist disabled passengers in carrying grocery or shopping bags from stores to paratransit vehicles and from paratransit vehicles to their residences.
- All transit vehicles are equipped with mobility device lifts/ramps and securement systems, and drivers will be proficient in their use.
- Adequate time will be given for individuals with disabilities to board or disembark transit vehicles.

Accessible Formats

This ADA policy and all information concerning the complementary paratransit application process will be made available in accessible formats upon request, including large print, Braille, audiotape and computer disk. Accessible formats are available by contacting the Office of Disability Services at Western Illinois University, the MCPT office or the provider's offices.

Training

All MCPT drivers will be properly trained in passenger assistance, emergency procedures and defensive driving techniques, including training in the safe operation of transit

vehicles, accessibility equipment, and proper treatment of persons with disabilities and the elderly.

Companions and Personal Care Attendants

The MCPT will also provide service to personal care attendants and/or companions traveling with an eligible rider. Personal care attendants will ride for free and companions will be charged the same fare as the eligible rider.

Service Animals

Service animals will be permitted to accompany passengers with disabilities in all MCPT transit vehicles. Service animals will be required to remain on the floor and out of the aisle area of the transit vehicle. The passenger utilizing the service animal will be responsible for the conduct of the animal. A service animal is any animal described as a guide dog, signal dog, or other animal individually trained to provide assistance to an individual with a disability.

Other Service Guidelines and Requirements

1. Portable Respirators and Portable Oxygen: Accommodations will be made for those passengers needing portable respirators and portable oxygen. Adequate time will be provided in the scheduling of demand response and complementary paratransit vehicles for those passengers in need of such devices. Persons needing such service must notify the dispatcher at the time a ride appointment is made so that adequate time for boarding and disembarking can be scheduled.
2. Shoulder and Lap Seatbelts: It is the policy of the MCPT that shoulder and lap seatbelts are required for all passengers and drivers of demand response and complementary paratransit vehicles. Persons using mobility devices for transportation seating also are required to use shoulder and lap seatbelts when provided for in the transit vehicle. Persons refusing to use shoulder and lap seatbelts must have a medical waiver from a licensed professional. Seatbelt extensions shall be provided in transit vehicles for those individuals needing such extensions.
3. Mobility device Lifts, Ramps, and Securement Systems: The following guidelines and requirements related to wheelchair lifts, ramps and securement systems:
 - All MCPT transit vehicles are equipped with mobility device lifts or ramps.
 - All MCPT transit vehicles will have securement systems for mobility devices. Mobility device users must allow their mobility devices to be properly secured, but will not be denied service on the grounds that a mobility device cannot be secured. Mobility device users will not be required to transfer to another seat if their mobility device cannot be properly secured.
 - Drivers will be proficient in the operation of all lifts, ramps and securement systems and will provide assistance upon request or as necessary with lifts, ramps and securement systems.

- A person not in a mobility device who may have difficulty boarding or disembarking a transit vehicle may be allowed to use a vehicle's lift or ramp upon request.
- A mobility device lift will be deployment at any designated stop if such deployment is necessary or requested by a passenger, unless the mobility device lift cannot be deployed because it would be damaged if deployed or a temporary condition precludes the safe use of the wheelchair lift.
- In the event a wheelchair lift becomes inoperable, the transit vehicle will be taken out of service and a backup vehicle will be used until the lift is repaired. When a backup vehicle is not available, another transit vehicle may be re-routed to accommodate passengers so that scheduled appointments may be kept.

4. Mobility Device Guidelines: ADA accessibility guidelines require that a wheelchair platform lift be at least 30 inches wide and 48 inches long. ADA guidelines also require sufficient maneuvering space to allow a mobility aid device to reach a securement area.

For the purpose of this policy, a wheelchair is defined as three-or-more wheeled mobility aid device, usable indoors, designed for and used by individuals with mobility impairments, whether operated manually or powered. With respect to the size and weight of wheelchairs, MCPT will transport a wheelchair and its user, as long as the lift can accommodate the size and wight of the passenger and the wheelchair, and there is space fir the wheelchair on the vehicle. However, MCPT is not required to carry a wheelchair if the lift or vehicle is unable to accommodate the wheelchair and its user, consistent with legitimate safety requirements according to the lift manufactures.

Eligibility—Complementary Paratransit Service

Eligibility for MCPT complementary paratransit service is based on a person's functional inability to use the traditional and regular fixed route bus service in the City of Macomb and McDonough County. The three categories of eligibility for complementary paratransit service established by the Americans with Disabilities Act (ADA) are as follows:

- Eligibility Category 1 – Inability to Navigate System Independently
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 is eligible for ADA paratransit.
- Eligibility Category 2 – Lack of Accessible Vehicles, Stations, or Bus Stops
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 on 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 is eligible for ADA paratransit.

- Eligibility Category 3 – Inability to Reach a Boarding Point or Final Destination
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 is eligible for ADA paratransit.

Some persons with disabilities may be able to use the regular fixed route bus service under certain conditions, but not under others. Therefore, eligibility for complementary paratransit service for some people will be determined on a trip-by-trip basis.

A person with a temporary disability may also be eligible for complementary paratransit service based on the above eligibility criteria and a recommendation from a medical professional. Length of eligibility is based on the recommendation of the medical professional.

Visitors to the area are also eligible for complementary paratransit service if they meet the above eligibility criteria or have been determined eligible for such service by another transportation agency. Complementary paratransit service will be provided to visitors on a presumptive basis for up to 21 days. Visitors are defined as persons living outside MCPT's fixed route service area. Visitors will be treated no differently than eligible complementary paratransit passengers residing within MCPT's fixed route service area, including the times they can travel, the fares charged, or other established service criteria.

All persons determined to be ineligible for complementary paratransit service must utilize existing demand response and fixed route bus services provided by McDonough County Public Transportation.

Any person wishing to request eligibility for ADA complementary paratransit service must complete an application with the Office of Disability Support Services at Western Illinois University. An interagency agreement between the Office of Disability Support Services and the MCPT has been established whereby the Office of Disability Support Services determines eligibility for complementary paratransit service based on the application procedure outlined below.

Complementary ADA Paratransit Application

Any person who believes that he/she is unable to utilize regular and traditional fixed route and demand response transit services provided by MCPT must complete an application (see Attachment 1A) with the Office of Disability Services (DSS) at Western Illinois University in order to determine eligibility for ADA complementary paratransit services. Applications are available on-line, by telephone or in person as follows:

Address: Office of Disability Support Services
Seal Hall
Western Illinois University
One University Circle
Macomb, Illinois 61455

On-line: www.gowest.wiu.edu

Telephone: 309-298-2512

Some applicants may need to participate in an in-person evaluation to determine eligibility. Notification will be given to those individuals by DSS if an in-person evaluation is necessary. Information gathered to determine eligibility will not be shared with outside agencies and organizations. Privacy of the applicants must be respected at all times.

Complementary paratransit eligibility may be granted for up to four years. New applications must be submitted to renew eligibility. Renewal applications should be submitted at least 30 days prior to the expiration date of a person's current eligibility period.

Applicants will be notified in writing whether or not they are eligible within 21 days of the receipt of a complete application. Eligible applicants will receive a photo identification card that they must present to the transit vehicle driver at the beginning of the trip. Photographs of the applicant may be submitted with the application or can be taken by DSS at the request of the applicant. If an applicant is determined ineligible, the written notification must specifically state the reasons for the finding and must relate to the aforementioned eligibility categories.

Persons who are denied eligibility for complementary paratransit services have the right to appeal the decision. A request for appeal must be filed in writing within 60 days of the denial of the application. An Appeals Committee will review the appeal and issue a decision within 30 days. The Appeals Committee shall consist of the following persons: Mayor of the City of Macomb, the Macomb Community Development Coordinator, and the Transit System Director. Persons denied complementary paratransit services will be given the opportunity to present their case in person before the Appeals Committee if they choose to do so. They may also present additional information as part of their appeals process as to why they are entitled to such services. If a decision on the appeal is not made by the Appeals Committee within 30 days of the completion of the process, the individual will be considered "presumptively eligible" and will be provided complementary paratransit service until a decision to deny the appeal is issued.

Complementary ADA Paratransit Hours of Operation

ADA complementary paratransit services are available during the hours that the fixed bus system (Go West Transit) operates in the City of Macomb and McDonough County.

Hours of operation vary at different times throughout the year depending on whether Western Illinois University is in session. Persons interested in ADA complementary paratransit service should refer to the current MCPT bus schedule or contact the Office of Disability Services to determine hours of operation.

Complementary Paratransit Service Area

The ADA complementary paratransit service area is three-quarters of a mile from a Go West fixed route.

Complementary Paratransit Service Fares

Fares for complementary paratransit service will not exceed the fare charged to an individual paying full fare for a trip of similar length, at a similar time of day for the regular MCPT fixed route bus service. Eligible complementary paratransit passengers will ride at no cost if regular and traditional fixed route passengers are riding at no cost.

Adopted:

- MCPT Committee on 01-13-06
- City Council on 02-06-06

Updated:

- City Council on 03-07-22

**TRANSIT VEHICLE OPERATOR POLICY AND PROCEDURES FOR
COMPLIANCE WITH THE AMERICANS WITH DISABILITIES ACT
(ADA)
MCDONOUGH COUNTY PUBLIC TRANSPORTATION**

The following policies and procedures are to be adhered to by all drivers operating fixed route, demand response and paratransit vehicles for the McDonough County Public Transportation System (hereinafter referred to as "MCPT"). The policies and procedures are applicable to all ADA regular and complementary paratransit services provided by the MCPT, and includes the following transportation service providers: Demand Response and Go West Transit.

Maintenance

- Drivers must include in their pre/post-trip inspections a check of all wheelchair lifts, ramps, inside and outside step lighting, interior lighting, securement devices, public address system and radio equipment.
- Any equipment that is not operating properly must be reported to the supervisor immediately.
- A transit vehicle with inoperable equipment will be taken out of service if a spare vehicle is available. If a spare vehicle is not available, the transit vehicle may be used to pick up passengers that are not in need of lift, ramp and securement equipment.
- Transit vehicles with inoperable equipment will be repaired within five days, unless parts are not available that soon. In those cases, transit vehicles must be repaired as soon as such parts become available.
- All drivers of transit vehicles will be proficient in the manual operation of wheelchair lifts and ramps should such need arise. Any malfunction of equipment during operation must be reported to the dispatcher so that assistance can be provided or a replacement vehicle can be dispatched to accommodate the passengers. All equipment failures must be reported on the post-trip inspection checklist.
- Drivers must check the front and side external destination signs when such signage is applicable. Signs must be legible and sign lighting must be working properly. Any malfunction of signage must be reported to the dispatcher and the driver must announce route information to passengers at bus stops and transfer points.

Training

- MCPT and its service providers will ensure that all drivers receive training that includes hands on instruction in the operation of each type of wheelchair lift, ramp and securement system.

Wheelchair Lift, Ramp and Securement System Use

- MCPT will transport passengers using a mobility aid device even if such device cannot be secured by the transit vehicle's securement system. A driver must notify the dispatcher if such a situation occurs.
- ADA guidelines state that passengers using wheelchairs cannot be required to use safety and shoulder belts unless it is required of all other passengers. It is the policy of the MCPT that all passengers use safety belts and shoulder belts, except in fixed route transit buses, which are not equipped with safety belts and shoulder belts for each passenger. A waiver may be granted for medical reasons if requested by a licensed medical professional.
- Wheelchair users must ride in areas of the transit vehicles that are equipped with securement devices. All wheelchairs must be secured in the transit vehicle, unless the securement system is not functioning properly. Passengers in wheelchairs cannot be denied service because the wheelchair securement system is not functioning. Any malfunction of the securement system must be reported to the supervisor and must be recorded on the post-trip checklist. Repairs must be made to the securement system within five days if parts are available.
- Wheelchairs must be secured in the transportation vehicle facing forward.
- Drivers are required to assist passengers in wheelchairs with the operation of securement systems, lifts and ramps. Drivers are required to leave their seats to provide such assistance. Passenger seats must be lifted out of place to provide for wheelchair use in the securement area of the transit vehicle, when necessary or required.
- Passengers using wheelchairs cannot be required to transfer to regular seats, but may be advised that this is allowable if they choose to do so.
- MCPT drivers are to load wheelchair passengers on to lifts with their feet away from the vehicle. Although ADA law states that the passenger must be allowed to be loaded face forward, MCPT believes that this is very dangerous and should be discouraged. If a passenger insists that he/she be loaded face forward, the driver should indicate in a polite manner to the passenger that this method of loading could be dangerous and must call the supervisor for authorization and assistance. There are known cases of partial foot and toe amputation because the passenger's wheelchair was too close to the vehicle.
- A securement system will be used for all mobility aid devices. Safety belts (with shoulder restraint) that attach to the floor of the vehicle shall be used if the vehicle is equipped with such equipment. If in rare occasions the shoulder restraint cannot be used, the lap belt alone will suffice.
- The following tie down procedure should be followed:
 - Ensure that the wheelchair brakes are applied;
 - Attach the straps to the floor connection points first;
 - Connect the front tie down straps (pull or cam type, not ratchet) to a T-connector or the frame on the front half of the wheelchair;

- Connect the back (ratchet type) tie down straps to a T-connector on the back half of the wheelchair;
- Do not connect straps to the wheels, footrests, armrests or any detachable or flexible part of the wheelchair and do not pass the straps through the rear spokes;
- Tightened tie-down straps must form a straight line with no slack at 45 degrees;
- Verify straps are secure and that the wheelchair does not move.
- Electric wheelchairs/scooters and other electric assistive mobility devices must have the power turned off when secured.
- Passengers are allowed to board either forward or backward on ramps that are deployed at sidewalk level. Drivers must provide assistance to passengers boarding this way. If a passenger declines such assistance, the driver should stand nearby to ensure that the wheels of the passenger's wheelchair do not go over the lip of the ramp.
- If a ramp is deployed at street level with no sidewalk and the ramp is on an incline, the driver must maintain full control of the passenger's wheelchair. The wheelchair should be pushed up and backed down the ramp to ensure that the passenger does not tip or fall out of the wheelchair.
- Drivers must permit individuals, including standees, to use the lift or ramp to board the transit vehicle if they request to do so. The driver should offer this option if he/she notices a passenger having difficulty climbing the vehicle's steps.
- A driver may refuse to allow passengers from using the lift or ramp to board the transit vehicle if the lift cannot be deployed at the stop because of the surrounding area, the lift will be damaged if deployed at the stop, and/or all passenger are precluded from using the stop due to conditions that are not under the control of the MCPT.
- On large transit buses, drivers must utilize the kneelers (if so equipped) if passengers have difficulty with steps or request that the bus be kneeled. Drivers should not kneel a transit vehicle for passenger loading at uncurbed locations (parking lots for example).

Other Service Requirements

- A driver may not require a passenger with a disability to use a designated priority seat if such a seat exists in the transit vehicle. If a designated priority seat is taken by a non-elderly or non-disabled passenger, the driver may request that the seat be vacated for an elderly or disabled passenger if he/she requests such seating.
- Fixed route bus stops must be announced at transfer points, major intersections and destination points, and all requested stops.
- Fixed route bus stops must be announced by drivers using the public address system at all stops shared by other routes. The external speaker must be used so that passengers waiting at the stops will be able to determine the name or number of each of the routes. If a transit vehicle's external speaker is malfunctioning, the driver must open the door and announce verbally the name and/or number of the

- route. On a transit vehicle not equipped with a public address system, the driver must call out using a loud and clear voice the name and/or number of the route.
- In the event that all wheelchair securement areas of a fixed route transit vehicle are occupied by passengers in wheelchairs and another passenger in a wheelchair needs to board, the driver must call the dispatcher to request assistance. A decision will be made by the dispatcher and the supervisor on how to accommodate the passenger.
 - Passengers with disabilities must be allowed to travel with a respirator or portable oxygen supply.
 - Passengers with disabilities must be allowed adequate time to complete boarding a transit vehicle. Drivers are required to offer and assist passengers as needed or requested.
 - Drivers must permit a person with a disability to board a transit vehicle with a service animal. A service animal is any animal described as a guide dog, signal dog, or other animal individually trained to provide assistance to an individual with a disability. Service animals are allowed on transit vehicles without muzzles.
 - If a service animal is not wearing identification that would indicate to the driver that it is trained as a service animal, the driver may ask the passenger what task the service animal is trained to perform.
 - Drivers may not insist on proof that an animal is a service animal. The driver may not ask the passenger about his/her disability and the passenger and service animal must be allowed to ride in the transit vehicle.
 - Drivers must make sure that there is adequate space for the service animal near the owner on the transit vehicle out of the aisle.
 - Drivers may exclude any service animal from riding on the transit vehicle if the animal's behavior poses a direct threat to the health and safety of others or is disruptive or uncontrollable. A service dog cannot be excluded from riding on the transit vehicle just because it barks. The service animal must show aggressive behavior. Drivers should call the dispatcher for assistance for all unusual occurrences.
 - Drivers should refer passengers requesting information concerning the transit system in large type or Braille to the MCPT office. This type of information is available upon request.