



Community Services, Inc.
DBA
Community Transit Service

**Americans with Disabilities Act
Policy**

Revised
September 14, 2023

Revisions Approved
February 7, 2024

Board Approved



President Signature



Date

Table of Contents

Introduction.....	4
Goals.....	4
Objectives.....	4
Policy.....	4
Definitions.....	5
General Procedures.....	6
Reservations.....	6
Scheduling Tips.....	6
Staff Training.....	6
Maintenance of Accessible Features.....	6
Inoperative Lifts and Ramps.....	6
Driver Assistance.....	7
Boarding.....	7
Alighting.....	7
Customer Responsibilities.....	7
Cancellation Policy.....	7
Priority Seating/Flip-Up Seats.....	8
Passenger Assistance.....	8
Passenger Wheelchairs.....	8
Wheelchair Securement.....	9
Use of Lift or Ramp by Individuals with Disabilities Not Using a Mobility Device.....	9
Accommodation of Other Mobility Devices.....	9
Transfer to Fixed Seating.....	10

Immobility.....	10
Disorientation.....	10
Non-Comprehension.....	10
Customer Impairment.....	10
Personal Care Attendant (PCA).....	10
Service Animals.....	11
Customer Behavior.....	11
Reasonable Modification.....	11
Guidelines for Implementing Policy Specific to Demand Response Services	
Service in the Most Integrated Setting.....	12
Service Characteristics.....	12
Accidents/Incidents/Complaints.....	12
Grievance Procedures.....	13
Termination of Services.....	13
Complaint Form.....	15
Record of Changes.....	16

AMERICANS WITH DISABILITIES ACT POLICY STATEMENT

Introduction

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

Community Transit Service was developed to provide safe and efficient transportation to the general public and persons with special needs as specified by the Americans with Disabilities Act (ADA) and as defined by contracts into which Community Transit Service may enter occasionally.

Goals:

Service is provided in a manner that meets these 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 available vehicles and commercial standard equipment.

Objectives

The specific objectives of Community Transit Service transportation services are:

1. To provide transportation designed to accommodate the general public and persons with disabilities, and
2. To maintain a trained staff for the operation and control of the system.

Policy

Community Transit Service policy is to comply with all the legal requirements of federal and state laws and regulations pertaining to individuals with disabilities. If state laws and federal regulations are contradictory, the federal ADA regulations prevail. The transit system provides quality transportation services without discrimination to all persons, including individuals with disabilities. Discrimination based on disability against any person by transit system employees will not be condoned or tolerated.

Definitions:

Disability: Concerning an individual, a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment.

Mobility Device: A device designed to assist an individual with disabilities with locomotion. Examples include wheelchairs, canes, crutches, and walkers. Also called a mobility aid.

Securement Area or Station: A designated location for riders using wheelchairs equipped with a securement system.

Securement Device, Equipment, or System: Equipment used for securing wheelchairs against uncontrolled movement during transport.

Service Animal: Any guide dog, signal dog, or other animals that has been individually trained to work or perform tasks for an individual with a disability, including, but not limited to, guiding individuals with impaired vision, alerting individuals with impaired hearing to intruders or sounds, providing minimal protection or rescue work, pulling a wheelchair, or fetching dropped items.

Wheelchair: A mobility aid belonging to any class of three- or more- wheeled devices, usable indoors, designed or modified for and used by individuals with mobility impairments, whether operated manually or powered.

General Procedures

All publicized services are made in accessible formats (i.e., large Print, TDD, Braille, audio tape) "upon request."

Reservations

To arrange a ride, customers must call Community Transit Service at 903-872-2405. Please be prepared to provide your name, the addresses of the pick-up and drop-off points, your arrival and departure times, and any special accommodations you may need.

Customers are required to telephone Community Transit Service to reserve a ride at least one (1) day but not more than two (2) weeks in advance of the desired trip. Reservations are accepted daily from 8 a.m. to 4 p.m., Monday through Friday. If a return ride is required, it should be scheduled at that same time. If scheduling permits, Community Transit Service may accommodate customers on shorter notice.

Scheduling Tips

Many factors can affect your travel plans. Weather can affect traffic conditions and slow service. Medical appointments, for example, are often delayed, so it is better to overestimate rather than underestimate your travel and appointment times. Please consider any conditions that may affect your pick-up and drop-off times.

Staff Training

All drivers and transit system staff are trained to be proficient in using accessibility equipment, the operating policies related to each service requirement, and appropriately and respectfully assisting and treating individuals with disabilities with sensitivity. Mechanics are also trained to properly maintain lifts, ramps, securement systems, and other accessibility equipment.

Maintenance of Accessible Features

Accessibility features on vehicles, including lifts, ramps, wheelchair securement devices, and public address systems, will be maintained in operative condition. The preventive maintenance program of Community Transit Service provides regular and frequent maintenance checks of these features as well as preventative maintenance as recommended by the equipment manufacturers. As good practice, the lift should be cycled as part of daily pre-trip inspections.

Inoperative Lifts and Ramps

Drivers are required to report any lift or ramp failures immediately. Vehicles with inoperative lifts will be removed from service and replaced with an accessible vehicle until the lift is repaired. It may be possible for vehicles equipped with ramps to continue in service as long as the ramp can be deployed manually when necessary. If an inoperative ramp cannot be (or is not) deployed manually, the transit agency will apply the policy for a vehicle with an inoperative lift.

Driver Assistance

Community Transit Service drivers will make themselves available to assist individuals with disabilities and will assist upon request of the passenger. Drivers will assist a passenger using the vehicle ramp, lift, or securement systems using their vehicle's accessibility-related equipment and features.

Boarding

Drivers and scheduling practices will provide adequate time for a passenger with a disability to board or disembark the vehicle, which includes adjusting the schedule if necessary and waiting for passengers to be seated before moving the vehicle. The driver is responsible for determining the safest location for passenger boarding based on conditions and individual needs upon arrival at the pick-up site. Only a properly trained transit system employee can operate the lift or ramp and secure the wheelchair in the securement station. Passengers may board facing toward or away from the vehicle.

Alighting

It is the driver's responsibility to determine that the location for passenger alighting is safe. However, the driver will allow a passenger who uses the lift or ramp to descend at any location unless the lift or ramp cannot be deployed, the lift or ramp will be damaged if deployed, or conditions at the stop would present unsafe conditions for all passengers. Only the driver will unsecure the wheelchair and operate the lift to return the passenger to the ground level.

Customer Responsibilities

Customers are expected to be ready and waiting inside the entrance door or other pre-arranged location at the agreed-upon time. Customers who cannot meet the Community Transit Service driver at the scheduled location or time are expected to call Community Transit Service and advise them as soon as possible. If Community Transit Service cannot meet the customer at the agreed-upon time, Community Transit Service will make every effort to alert the customer of this change.

Cancellation Policy

Community Transit Service requires a two (2) hour notice before pick-up time to cancel a reservation. Less than a two-hour notification is considered a NO-SHOW. This includes scheduled pick-ups and return trips. The client must cancel a Will Call no later than 5:30 p.m., or it will be considered a NO-SHOW.

A no-show occurs when a customer fails to appear to board the vehicle for a scheduled trip. This presumes the vehicle arrives at the scheduled pick-up location within the pick-up window, and the driver waits at least 5 minutes. When a customer has a no-show or late cancellation for a trip, all subsequent trips on that day remain on the schedule unless the rider explicitly cancels the trips. To avoid multiple no-shows or late cancellations on the same day, customers are strongly encouraged to cancel any subsequent trips they no longer need that day.

CTS management reviews all recorded no-shows and late cancellations to ensure accuracy before recording them in a customer's file. Customers will be subject to suspension under the following conditions:

- Schedule 20 or more trips within a calendar month and have no-shows or late cancellations totaling 20% of their trips or
- Schedule 8 to 19 trips within a calendar month and have no-shows or late cancellations totaling 40% of their trips; or
- Schedule 7 or fewer trips within a calendar month and have no-shows or late cancellations totaling 50% of their trips.

Two warning letters will be issued to notify the customer of the no-show and ask for cooperation in scheduling trips. If the problem continues, a progressive suspension length will be as follows:

- The first Suspension will be for five days;
- The second Suspension will be for ten days;
- The third Suspension will be for fifteen days, and
- Four and any subsequent Suspensions will be for thirty days.

Priority Seating/Flip-Up Seats

Priority seats are made available to individuals with disabilities.

All persons occupying flip-up seats in the wheelchair securement area will be relocated to accommodate individuals in wheelchairs.

Passenger Assistance

Demand response services will be provided on a curb-to-curb basis. Community Transit Service drivers will assist riders with disabilities in boarding and alighting from vehicles and securing wheelchairs. All Community Transit Service drivers will be proficiently trained in passenger assistance and sensitivity towards persons with disabilities.

Community Transit Service staff will not lift a passenger, leave a vehicle unattended or out of visual observation for a lengthy period, enter a rider's home, care for service animals, operate a power wheelchair, provide personal care attendant (PCA) service, or take actions that would be unsafe. If the individual needs more extensive assistance than Community Transit Service can provide as a public transportation provider, the individual will be responsible for arranging for personal assistance. Community Transit Service staff will work with the individual or their Caregiver/ Social Worker to clarify the assistance parameters the driver can provide and formally document this in a letter sent to the individual.

Passenger Wheelchairs

All accessible vehicles meet or exceed the requirements of 49 CFR Part 38. Transportation providers are required to carry a wheelchair and its user as long as the lift can accommodate the size and weight of the wheelchair and its user and there is space in the securement area for the wheelchair on the vehicle without blocking the aisle. If a vehicle lift/ramp and securement area can accommodate a wheelchair (or other mobility device), Community Transit Service will transport the device (and its user).

An individual who uses a wheelchair that, when occupied, exceeds the weight rating of the vehicle lift/ramp will be offered the opportunity to board and disembark from the vehicle separately from

the wheelchair. However, Community Transit Service staff cannot operate a passenger's wheelchair. The individual may travel with another individual who can assist with using the unoccupied wheelchair to maneuver it on and off the lift/ramp.

Wheelchair Securement

Community Transit Service requires that all wheelchairs be secured. Drivers should not allow passengers to ride if they are not appropriately secured unless the securement system will not accommodate the wheelchair. Drivers cannot deny a passenger a ride based on the inability to secure the 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.

Securement of wheelchairs is the responsibility of the driver. Drivers are trained to operate all secure equipment adequately based on the manufacturer's specifications. The driver will secure the wheelchair with four straps attached to the wheelchair at four separate securement points and attached to the vehicle at four individual anchor points. Drivers will listen to and respect riders' instructions on how to secure their equipment. Drivers cannot be expected to be familiar with every wheelchair type that may come aboard, and securement attachment points may differ by wheelchair manufacturer. The rider may be best positioned to instruct the driver on adequately securing their mobility device.

If the securement system is not compatible with the wheelchair the passenger is using, the driver will still attempt to secure the wheelchair safely. If the wheelchair cannot be attached because of the wheelchair design, the passenger still has the right to ride in the vehicle. Seat belts will never be used instead of independent securement of the passenger's wheelchair.

Drivers must secure wheelchairs only in the designated securement area, even if the passenger wants the mobility device to be secured in a non-designated area. The wheelchair is not allowed to block the aisle.

Seat belts and shoulder harnesses are required for ALL passengers. Seat belts will never be used instead of independent securement of the passenger's wheelchair.

In cases where an individual using a wheelchair attempts to board and requires the use of a securement location that is currently occupied by another passenger who is not using a wheelchair, the driver will ask that passenger to allow the individual using a wheelchair to use the securement position.

Use of Lift or Ramp by Individuals with Disabilities Not Using a Mobility Device

The driver will deploy the lift or ramp for an individual with a disability who is not using a mobility device to board or alight the vehicle upon request.

Accommodation of Other Mobility Devices

Mobility devices that are not wheelchairs but primarily designed for use by individuals with mobility impairments will be accommodated so that the ADA-compliant lift or ramp and securement areas can safely do so. However, these devices are the responsibility of the individual passenger. They must be

secured in a manner that does not interfere with the safe operation of the vehicles and the transport of other passengers.

Transfer to Fixed Seating

All passengers using wheelchairs can transfer to fixed seating once on board the vehicles. Drivers may recommend, but never require, wheelchair users to move to fixed seating. No waivers are allowed to be required Immobility.

Immobility

If the customer is incapable of self-mobility, or if self-mobility is possible, but the risk of falling or physical injury exists, and the assistance of a PCA would provide mobility or lessen the danger of injury, then the customer's attendant may accompany the customer at no cost.

Disorientation

Suppose the customer, due to a visual or mental impairment, cannot correctly orient themselves and navigate to reach a destination; the assistance of a PCA is required. In that case, the customer's attendant may ride at no cost.

Non-Comprehension

Suppose the customer, due to mental impairment, cannot perform those cognitive processes necessary to handle common occurrences adequately or cannot control their actions effectively; the assistance of a PCA is required. In that case, the customer's attendant may ride free.

Communication Impairment

If the customer cannot effectively transmit or receive communications due to sensory or mental problems, and if these problems prevent the customer from using the service, the customer's attendant may ride free.

Personal Care Attendant (PCA)

Attendants are required to specifically assist the customer, including, but not limited to, the following duties:

- Assisting the customer from their door to the bus and back again
- Opening doors
- Pushing wheelchairs
- Carrying packages
- Communication with the driver (if customer is unable)

If a PCA does not specifically perform some assistance for the customer, that person is considered a guest and is charged a full fare.

In addition to physician-related PCAs, attendants will be required to accompany under the following circumstances:

- Customers unable to orient themselves and navigate to reach a destination

- Customers unable to effectively control their actions
- Customers who will not remain seated and belted
- Customers using non-conventional wheelchairs and who are unable to transfer independently
- Children under seven (7) years of age, and
- Others, as required by the Transportation Coordinator

Service Animals

In compliance with 49 CFR Part 37, Community Transit Service allows trained service animals to accompany passengers with disabilities. The driver will not ask for proof of the animal's qualifications but may ask what tasks the animal has been trained to perform. However, any animal that is not under the passenger's control or which becomes a direct threat to the health or safety of other passengers may be restricted from riding.

Customer Behavior

To assure the safety and comfort of all customers and the driver, the following activities are prohibited on all vehicles, and persons who engage in these activities may be refused service:

- Smoking
- Eating and drinking
- Playing personal radios
- Consuming alcoholic beverages, using illegal drugs
- Using obscene or abusive language
- Behaving in ways that are violent or seriously disruptive
- Shoving, pushing, or behaving in a disorderly manner
- Causing damage to the vehicle

Reasonable Modification

Suppose a passenger with a disability requires modification of any of Community Transit Service's policies and practices to accommodate their disability to use the service. In that case, the passenger may request such a modification by contacting the Director of Transportation. The transit system will work with the individual to find an acceptable accommodation solution.

Where a request for modification cannot be made and determined in advance, operating staff will decide whether the change should be provided at the time of the request. Operating staff may consult Community Transit Service management before granting or denying the request.

Requests for modification of policies and practices may be denied only on one or more of the following grounds:

- Granting the request would fundamentally alter the nature of Community Transit Service's services, programs, or activities;
- Granting the request would create a direct threat to the health or safety of others;
- Without the requested modification, individuals with a disability can fully use Community Transit Service's programs, activities, or services for their intended purpose.

Suppose Community Transit Service denies a request for a reasonable modification; in that case, the transit agency shall take, to the maximum extent possible, other actions (that would not result in a direct threat or fundamental alteration of service) to ensure that the individual with a disability receives the services or benefit provided by Community Transit Service.

Guidelines for Implementing Policy Specific to Demand Response Services

Service in the Most Integrated Setting

Community Transit Service demand response transportation service is a shared-ride service. It is the policy of Community Transit Service to provide service for individuals with disabilities in the most integrated setting appropriate to the needs of the individual, including providing service to individuals with disabilities on the same vehicles and together with all other riders.

Service Characteristics

The Community Transit Service shall ensure that individuals with disabilities receive the same level of service as individuals without disabilities. The demand response system of Community Transit Service, when viewed in its entirety, provides equivalent service to individuals with disabilities, including individuals who use wheelchairs, concerning the following service characteristics:

- Response time: individuals with disabilities are not required to reserve services further in advance than other individuals.
- Fares: individuals with disabilities are not charged higher fares than other individuals.
- Geographic area of service: individuals with disabilities can use the service to travel to and from the same areas as other individuals.
- Hours and days of service: individuals with disabilities can use the service during the same days and hours as other individuals.
- Restrictions or priorities based on trip purpose: travel by individuals with disabilities is no longer restricted by trip purpose than travel by other individuals.
- Availability of information and reservation capability: individuals with disabilities have access to the same information and reservation capability as others.
- Any constraints on capacity or service availability: travel by individuals with disabilities is not limited by capacity more than travel by others.

Accidents/Incidents/Complaints

All complaints of discrimination will be forwarded to the Director of Transportation and promptly and objectively investigated. Community Transit Service will quickly communicate its response to the complaint allegations, including its reasons for the response, to the complainant. The response will be documented. When warranted, corrective or disciplinary action will be taken for behavior prohibited by this policy, including termination of employment. Documentation of each complaint will be kept on file for seven years. To file a complaint via phone at 903-875-3736, via email at kragan@csicorsicana.org, or by direct mail to the Director of Transportation, Community Services, Inc., P.O. Box 612 Corsicana, TX 75151

All accidents/incidents and discriminatory complaints will be documented and filed separately according to the complaint type and the complainant's response.

When filing a complaint, please provide the following information:

- Contact information (name, address, telephone or email)
- Mobility aid used (if any)
- Date, time, and location of the incident
- Vehicle ID number
- Name(s) of agency employee(s) or others

Grievance Procedures

Step 1: The complainant will contact Katie Ragan to report the complaint by phone, mail, or email (contact information listed above). Mrs. Ragan will contact the complainant immediately in response to the complaint; if there is no response or resolution, proceed to step two.

Step 2: The complainant will contact Daniel Edwards, Sr., Executive Director at Community Services Inc. by phone: 903-875-3721, by email: dedwards@csicorsicana.org or by mail: Community Services Inc., P.O. Box 612, Corsicana TX, 75151. Mr. Edwards will respond within seven days, sooner preferred; if there is no response or resolution, proceed to step three.

Step 3: The complainant will notify in writing Dairy Johnson, Chairperson of the Community Services, Inc. Board of Directors by mail: Community Services, Inc., P.O. Box 612, Corsicana TX, 75151. If the aggrieved person needs assistance preparing the letter, they may request assistance from a third party. The chairperson shall then convene a committee to be composed of three persons. One member, who shall serve as chairperson shall be chosen by the Community Services, Inc. Chairperson from among the Community Services, Inc. Board membership. A second member shall be a Community Transit Service user and be chosen by the aggrieved person. The Community Services, Inc. Board Chairperson shall select a third member. The committee shall then meet the aggrieved person. The hearing is limited to the specific grievance presented in the letter. If these efforts prove unsuccessful within ten to fourteen business days, proceed to the final step.

Following deliberation, the committee shall present a written recommendation to the chairperson for disposition by the Community Services, Inc. Board of Directors.

Final Step: The aggrieved person shall present their grievance to:

Texas Department of Transportation
Civil rights Division
125 E 11th Street
Austin, TX 78701

Termination of Services

If a person does not follow guidelines and procedures involving the use of Community Transit Service Transportation, services will be terminated as follows:

1. If feasible, the person will receive two oral warnings.
2. If compliance is not achieved after the two oral warnings, the person shall receive a written warning stating in detail the area of non-compliance.
3. If compliance is not achieved after the written warning, the person shall be notified in writing that their use of all or a portion of Community Transit Service services is terminated, with a statement of reasons thereof.

Complaint Form

Community Transit Service is committed to providing safe and reliable transportation services, and we want your feedback. Please use this form for suggestions, compliments, and complaints. All complaints should be directed to Katie Ragan at Community Transit Service by phone: 903-875-3736, email: kragan@csicorsicana.org, or by mail: Community Services, Inc., P.O. Box 612 Corsicana, TX 75151

SECTION I: TYPE OF COMMENT (Choose One)*				
Compliment__	Suggestion__	Complaint__	Other:_____	ADA Related? Y / N
SECTION II: CONTACT INFORMATION				
Salutation [Mr. / Mrs. / Ms., etc.]:				
Name:				
Rider ID (if applicable):				
Street Address:				
City, State, Zip code:				
Phone:		Email:		
Accessible Format Requirements:	Large Print__	TDD/Relay__	Audio Recording__	Other_____
SECTION III: COMMENT DETAILS				
Date of Occurrence:		Time of Occurrence:		
Name/ID of Employee(s) or Others Involved:				
Vehicle ID/Route Name or Number:				
Direction of Travel:				
Location of Incident:				
Mobility Aid Used (if any):				
If above information is unknown, please provide other descriptive information to help identify the employee:				
Description of Incident or Message:				
SECTION IV: FOLLOW-UP				
May we contact you if we need more details or information?		Yes	No	
What is the best way to reach you? (Choose One)*	Phone	Email	Mail	
If a phone call is preferred, what is the best day and time to reach you?				
SECTION V: DESIRED RESPONSE (Choose One)*				
<input type="checkbox"/> Email response <input type="checkbox"/> Telephone response <input type="checkbox"/> Response by U.S. Postal Mail				

The following table is used to record final changes made to the ADA Policy during the annual update. This table will be a permanent record of the changes to the ADA Policy over time.

Record of Changes

Document Version	Section/Pages Changed	Reason for Change	Reviewer Name	Date of Change
2	All pages	Review and updated based on requirements.	Katie Ragan	March 21, 2012
3	All pages	Review and updated based on requirements.	Katie Ragan	July 6, 2015
4	All pages	Review and updated based on requirements.	Katie Ragan	May 10, 2019
5	All pages	Review and updated based on requirements.	Katie Ragan	January 7, 2020
6	All pages	Review and updated based on requirements.	Katie Ragan	September 14, 2023
Header	Text	Text	Text	Text