

Americans with Disabilities Act (ADA) Complementary Paratransit Plan

City of Platteville

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I. GENERAL

A. Introduction

DOT regulations and transportation-related provisions of the Americans with Disabilities Act (ADA) of 1990, Section 504 of the Rehabilitation Act of 1973, as amended and 49 CFR Parts 27, 37, 38 and 39 set specific requirements for transit providers to ensure that individuals with disabilities are not excluded from, denied the benefits of, or subject to discrimination. The ADA applies to almost all providers of transportation service, whether private or public, and whether or not an entity receives Federal financial assistance.

The Americans with Disabilities Act of 1990 (ADA) requires that public entities that operate non-commuter fixed route transportation services also provide complementary paratransit service for individuals whose disabilities make them unable to use the fixed route system.

ADA requires that paratransit service be “comparable” to the fixed route service in terms of service levels and availability. In addition, the regulations require that public entities that are subject to the ADA regulations develop and administer a process for determining if individuals who request service meet the regulatory requirements for eligibility.

The **Platteville Public Transportation System** ADA Complementary Paratransit plan is designed to inform the public about **Platteville Public Transportation System’s** special transportation service. This document includes policies and procedures, rules and regulations, and guidelines for use of the complementary paratransit system, along with answers to many questions about the program.

All **Platteville Public Transportation System** paratransit customers should review this manual carefully and refer to it whenever questions arise.

For additional information, please contact the **Platteville Public Transportation System** ADA Coordinator at 608-348-9741, Ext 2240 .

B. Policy

It is the **City of PLATTEVILLE’s** policy to provide safe and efficient complementary paratransit transportation to all individuals.

As such, no person shall, solely by his/her disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity undertaken by the **Platteville Public Transportation System**.

C. Objectives

Complementary paratransit service meets the specific objectives of the ADA requirements by:

1. Providing demand-response “origin-to-destination”¹ transportation on specially equipped accessible vehicles designed to accommodate persons with disabilities.
2. Maintaining a trained staff for the operation and control of the service. For more

¹ “Origin-to-destination” service means providing service from a passenger’s origin to the passenger’s destination. A provider may provide ADA complementary paratransit in a curb-to-curb or door-to-door mode. When an ADA paratransit operator chooses curb-to-curb as its primary means of providing service, it must provide assistance to those passengers who need assistance beyond the curb in order to use the service unless such assistance would result in a fundamental alteration or direct threat.” §37.3

information see the attached *Employee Training Information*.

3. Providing on-going mechanisms for persons with disabilities to provide input on the **City of Platteville's** ADA demand response service.

D. Public Participation and Information

Per the ADA, there needs to be a process for public input and ability to comment regarding any changes in any of its public transportation services. Also, the provider of ADA paratransit service must provide for ongoing participation in the operation and assessment of associated services by individuals with disabilities.

Platteville Public Transportation System uses a Transportation Advisory Committee (TAC) to fulfill these requirements. It is designated as the Platteville Public Transportation Committee.

Platteville Public Transportation Committee represents a broad cross section of individuals, social service provider groups, non-profit organizations, University of Wisconsin – Platteville staff and student groups, and local, state, and federal agencies within the city. The role of the **Platteville Public Transportation Committee** is to promote and facilitate individual, group, and agency involvement in the planning and implementation of effective coordinated public transportation within the county.

Platteville Public Transportation Committee member duties include:

- To advocate for transit dependent individuals
- To strengthen public relations and community education for **Platteville Public Transportation System**
- Assist as feasible with resolution to customer service issues
- To provide community insight for the development of service policies
- To assist with fund development for Platteville Public Transportation System

II. OPERATIONS AND VEHICLES

A. General – Service Criteria

U.S. Department of Transportation ADA regulations requires **Platteville Public Transportation System**, as a provider of complementary paratransit, to provide riders with disabilities and riders without disabilities, an 'equivalent' level of service:

- ✓ Response Time
- ✓ Fares
- ✓ Service area
- ✓ Hours and Days of Service
- ✓ Trip purposes
- ✓ Availability of Information and Reservations Capability
- ✓ Capacity constraints

The City of Platteville has chosen to provide “premium” complementary paratransit service. Premium service means the complementary paratransit service goes “above and beyond” what is required by ADA. The service is considered premium by exceeding ADA obligations in the following ways:

- Same-day trip requests are honored, when reservations are available
- Eligibility is unrestricted, and includes all individuals²

² Subject to “No-Show” and rules of conduct policies.

- Service is offered during days and times when fixed-route bus service is not operating
- Service is offered beyond areas where fixed-route bus service operates

Response Time

The elapsed time between a request for service and the provision of service is the same for riders with and without disabilities.

The **Platteville Public Transportation System** will schedule and provide paratransit service to any individual at any request time on a particular day in response to a request for service made the previous day.

Reservations may be taken by **Platteville Public Transportation System** staff or by mechanical means (voicemail). Advance reservations may be made up to 7 days in advance of an individual's desired trip(s). If requests for service are made with less than the next day notice, **Platteville Public Transportation System** staff will attempt to schedule the trip.

Fares

Adult.....	\$2.75
Senior (ages 65+).....	\$2.50
Youth (high school age or below)	\$2.50
Disabled.....	\$2.50
Additional rider between same locations.....	\$1.00
Intermediate stop (e.g. ATM)	\$1.00 per stop
Outside City limits above base rate	\$2.00 per mile

Personal Care Attendants (PCA's) can travel for free with riders paying full fare, but must have the same origin and destination.

Service Area

The service area includes the City of Platteville municipal boundaries and within a nine (9) mile radius of the boundary. Trips must either begin or end within the City of Platteville municipal boundary.

Days and Hours of Service

Days	Hours
Monday – Wednesday	6:00 AM – 8:00PM
Thursday - Saturday	6:00 AM - 3:00 AM
Sunday	7:00 AM – 8:00 PM
Holidays	None

Holidays include New Year's Day, Memorial Day, July 4th, Labor Day, Thanksgiving and Christmas Day.

Trip Purpose

Platteville Public Transportation does not prioritize trips based on trip type or trip purpose. Since the fixed route service can be used for any trip purpose, so must the complementary paratransit service. There also can be no prioritization based on trip purpose; for example, medical trips cannot be given priority over recreational trips.

Availability of Information, Reservations Capability and Stop Announcements

Availability of Information - **Platteville Public Transportation System** provides riders with disabilities the same access to the same information and reservation system as other riders.

Reservations Capability - Contact **Platteville Public Transportation System** staff if you need information in alternate formats that are not currently provided. (e.g. large print, audio, or accessible electronic files for riders with vision disabilities).

Wisconsin Relay Service, 7-1-1 is a free service state of Wisconsin resource that assists with communication needs.

- <http://www.wisconsinrelay.com> provides full telephone accessibility to people who are deaf, hard-of-hearing, deaf-blind and speech disabled.
- <http://www.wisconsinrelay.com/features> provides Spanish relay service.

Stop Announcements – Vehicle operators are mandated to announce transfer locations, major stops on the fixed route bus system routes along the route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location. **Platteville Public Transportation System** drivers and operators shall announce any stop on request of an individual with a disability.

Capacity Constraint and Monitoring

The **Platteville Public Transportation System** ensures the level of service available to riders with disabilities is the same for riders without disabilities. To ensure service equivalency, **Platteville Public Transportation System** monitors trip denials, frequency of being wait-listed, and telephone hold times.

Performance data will be collected and reported in a ***Trip Denial Log*** for the purpose of establishing whether capacity constraints exist.

B. Vehicle Selection, Maintenance and Accessibility

Vehicle Selection - **Platteville Public Transportation System** fixed route service is in compliance with ADA in terms of providing accessible vehicles and ensuring new stops are accessible.

Maintenance - All vehicles in the **Platteville Public Transportation System** fleet must be properly maintained including the operative condition of all accessibility features available to individuals with disabilities. These features include lifts, ramps, securement devices, signage, and systems to facilitate communication. All accessibility features will be repaired promptly.

In the event of an inoperative device or impaired accessibility feature, the vehicle will be removed from the assigned route until all repairs are complete. If the device or accessibility feature occurs or is noticed during the middle of a shift, the vehicle must either be repaired or removed from the route prior to the start of the next service day.

Accessibility - All of **Platteville Public Transportation System** fixed route buses and paratransit vehicles are accessible for mobility devices and disabled individuals.

Fixed-route bus drivers shall pick up and disembark disabled passengers including mobility devices at all designated bus stops unless the lift or ramp cannot be deployed, the lift will be damaged if deployed, or temporary conditions preclude the safe use of the stop by all passengers.

In the event of an unsafe disembark location the driver shall temporarily use the next closest corner or safe bus stop to disembark the passenger as to not cause any damage to the lift or to harm the passenger.

III. ADA PARATRANSIT ELIGIBILITY DETERMINATION, APPLICATION AND APPEALS PROCESS

A. Eligibility Criteria

The City of Platteville has chosen to provide “premium” complementary paratransit service. Premium service means the complementary paratransit service goes “above and beyond” what is required by ADA. One way the City of Platteville has chosen to go above and beyond is to open the complementary paratransit service to all individuals. Therefore, the complementary paratransit service does not have eligibility requirements. All individuals interested in utilizing the service are automatically eligible.

B. Application Process

The City of Platteville has chosen to provide “premium” complementary paratransit service. Premium service means the complementary paratransit service goes “above and beyond” what is required by ADA. One way the City of Platteville has chosen to go above and beyond is to open the complementary paratransit service to all individuals. Therefore, the complementary paratransit service does not have eligibility requirements. All individuals interested in utilizing the service are automatically eligible.

C. Appeals Process

The City of Platteville has chosen to provide “premium” complementary paratransit service. Premium service means the complementary paratransit service goes “above and beyond” what is required by ADA. One way the City of Platteville has chosen to go above and beyond is to open the complementary paratransit service to all individuals. Therefore, the complementary paratransit service does not have eligibility requirements. All individuals interested in utilizing the service are automatically eligible.

IV. PASSENGER RESPONSIBILITIES

General Passenger Condition

All passengers must be able to sit in a vehicle seat or wheelchair in order to be transported.

Any passenger whose medical condition is such that the passenger is incoherent or requires immediate medical attention to sustain life may be denied service. Complementary paratransit service is to be considered a “common carrier” and does not perform ambulance or emergency service.

Rules of Conduct

The rules of conduct will assist in the safety and comfort of the riders and operator. Riders who violate rules of conduct are subject to penalties, up to and including suspension of service.

- ✓ No eating, drinking, or smoking on board.
- ✓ No abusive, threatening, or obscene language or actions.
- ✓ No physical abuse of another rider or the vehicle operator.
- ✓ No operating or tampering with any equipment while on board.

If the driver reasonably believes a passenger’s physical condition or conduct is hazardous, or if a passenger possesses weapons, instruments or equipment that are reasonably believed to be dangerous, service may be terminated immediately.

The passenger will be notified of his/her right to appeal the termination and the **Platteville Public Transportation System** will hear the appeal as soon as reasonably possible.

Requesting Service

Trip Reservation

ADA requires that, at a minimum, next day service be provided. The City of Platteville has chosen to honor same-day trip requests, when reservations are available. **Platteville Public Transportation System** offers after-hours reservation line via voicemail to accommodate this requirement. After-hours trip requests can be made on the voicemail system. Individuals who request after-hour trips will be contacted by **Platteville Public Transportation System** staff to confirm the trip as soon as possible, however at least **one (1) hour** prior to the requested trip time.

Platteville Public Transportation System has no limitation on the number of trips per day or trips per person that can be made.

Passengers can schedule service by calling the **Platteville Public Transportation System** at 608-348-6767 or TTY# 711. Please provide the following information:

1. Name
2. Phone Number
3. Pick-Up Address
4. Destination Address
5. Desired Pick-Up Time
6. Desired Drop-Off Time (Appointment Time)
7. Number of Passengers (including a Personal Care Attendant (PCA) or companion)

8. If Round Trip, Time of Return Trip
9. If a Mobility Device will be used

Negotiating a Pickup Time

Platteville Public Transportation System may negotiate pickup times with an individual, however **Platteville Public Transportation System** may not require an individual to schedule a trip to begin more than **one (1) hour** before or after the individual's desired departure time.

Subscription Service

Platteville Public Transportation System allows subscription service as part of the paratransit system. Subscription service may not absorb more than **fifty percent (50%)** of the number of trips available at a given time of day, unless there is non-subscription capacity.

Trip Denials

Platteville Public Transportation System records *all* trip requests, regardless of whether the trip is denied.

To ensure a pattern or practice of a substantial number of trip denials is not occurring, **Platteville Public Transportation System** uses a ***Trip Denial Log*** to document and analyze all trip denials. Every attempt will be made to avoid trip denials.

Cancellations

All cancellations require a one (1) hour notification prior to the scheduled pick up time.

Riders should telephone the **Platteville Public Transportation System** office as soon as possible once it is determined that the rider no longer requires the scheduled pickup. If no one is available to take the call the rider may leave a voice message indicating the date and times of rides being cancelled, or call back at a later time to speak directly with **Platteville Public Transportation System** staff.

A late cancellation is defined as either – a cancellation made less than one (1) hour before the scheduled pick up time or as a cancellation made at the door or a refusal to board a vehicle that has arrived within the pick-up time window.

No Shows

A no-show occurs when the **Platteville Public Transportation System** arrives at the scheduled pickup location within the pickup time window and the driver waits at least five (5) minutes, but the rider fails to appear.

No-shows due to **Platteville Public Transportation System** staff error or circumstances beyond a rider's control do not count as a no-show or late cancellation.

Transit agencies are able to establish a process for suspending service to individuals who are unduly disrupting operation with frequent no-shows. See copy of ***No Show Policy*** attached.

Riding Complementary ADA Paratransit Service

Pickup Time Window

The pickup time window is defined as **15 minutes** before the scheduled pick up time, to **15 minutes** after the scheduled pick up time. Riders must be ready to board the vehicle within the pickup time window. The driver will wait for a maximum of **five (5) minutes** within the pickup time window for the rider.

Driver Assistance

Service may not be rendered if the vehicle cannot access the origin or destination location, or if the location does not provide safe passage for the vehicle or safe access to the vehicle by the passenger. The driver shall immediately call the dispatcher for further instructions in such case.

Drivers must be properly trained in the use of accessibility equipment as well as sensitivity to people with disabilities.

Drivers are not permitted to do the following:

- ✓ Maneuver a wheelchair up or down any steps. This rule is provided for the safety of the passenger and the driver.
- ✓ Deny an individual transportation because a vehicle's securement system is unable to secure the mobility device.
- ✓ Provide a level of assistance that constitutes a direct threat to the health or safety of the driver.

Safety Tips

- Be sure the driver is ready to assist you before approaching the lift or ramp.
- Follow the instructions given by the driver.
- If you use a wheelchair, make sure it is properly tied down and the brakes are on.
- If you use a power wheelchair, turn off the power after it has been secured.
- Always wear your seatbelt.

Accommodations of Wheelchairs

All wheelchairs are required to be secured within the securement system to ensure that the wheelchair remains secured. However, **Platteville Public Transportation System** will not deny transportation to a wheelchair or its user because the device cannot be secured or restrained satisfactorily by the vehicle securement system.

Individuals using wheelchairs/mobility devices shall be transported in **Platteville Public Transportation System** vehicles if their wheelchair/mobility device meets the following criteria:

- Device must meet the definition in FTA 49 CFR 37.3: "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.
- The wheelchair/mobility device and occupant combined weight does not exceed that of the lift specifications and the carriage of the wheelchair is demonstrated to be consistent with legitimate safety requirements.
- **Platteville Public Transportation System** does not permit riders who use wheelchairs to ride in places other than designated securement locations in the vehicle, proper wheelchair securement procedures must be used.
- The wheelchair/mobility device width must be compatible so as to fit on the ramp and within the securement area.

Vehicle ramps/lifts and kneelers are inspected daily. Regular preventative maintenance is performed on the ramp/lift on a scheduled basis. Vehicle Operators are instructed to report defects/failures in the ramp/lift immediately to dispatch.

Platteville Public Transportation System staff will promptly remove the vehicle with the

malfunctioning ramp from service. Repairs to the ramp/lift are made promptly. The vehicle will not be returned to service until the ramp/lift has been repaired.

At any time, if an accessibility feature on a **Platteville Public Transportation System** vehicle is inoperable **Platteville Public Transportation System** will take reasonable steps to accommodate individuals with disabilities who rely on these features.

Persons with mobility disabilities may use devices other than wheelchairs to assist with locomotion such as canes, walkers, crutches etc. The devices will be accommodated on the same basis as wheelchairs.

Ramp/Lift and Securement Use

Drivers are instructed to deploy the ramp/lift when operating vehicles to provide accessibility for all riders. Drivers shall not refuse to permit a passenger who uses a lift/ramp to disembark from a vehicle at any designated stop, unless the lift cannot be deployed, the lift will be damaged if it is deployed, or temporary conditions at the stop, not under the control of the entity, preclude the safe use of the stop by all passengers.

Personal Care Attendant (PCA)

Personal Care Attendants (PCA's) can travel with eligible clients for free, but must have the same origin/destination. Companions/guests can travel with an eligible client for the same amount charged to the ADA eligible rider. Arrangements for additional companions should be made at the time of the reservation.

V. MISCELLANEOUS

Visitor Policy

Visitors to the area must be provided 21 days of service (in a 365 day period) when they provide documentation of ADA paratransit eligibly from another area. If a person is traveling from an area that doesn't have paratransit services they can be requested to provide documentation of their disability. If more than 21 days of service is needed, visitors can be required to go through the local eligibility process.

Medical Equipment

Platteville Public Transportation System shall not prohibit an individual with a disability from traveling with a respirator or portable oxygen supply. **Platteville Public Transportation System** allows riders to use the concentrators as needed while aboard the vehicle.

Service Animals and Accommodations of Animals

Under the Americans with Disabilities Act (ADA) of 1990, a *service animal* means a guide dog, signal dog or other animal 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.

As such, it is the policy of the **Platteville Public Transportation System** to allow *service animals* to accompany their owner without restraint.

The ADA allows for the imposition of legitimate safety requirements that are necessary for the safe operation of paratransit service. The **Platteville Public Transportation System** may require use of a secured pet travel carrier for any animal that is a health or safety hazard regardless of the kind of training it has received and what function it serves for its owner.

Carry-on Packages

Drivers will help passengers take lightweight items off the vehicle and set them on the curb. If additional assistance is required, this assistance may be rendered on a case-by-case basis.

Inclement Weather

In the unlikely event of service cancellation due to inclement weather or other emergency, **Platteville Public Transportation System** personnel shall attempt to contact all scheduled passengers. **Platteville Public Transportation System** also advises passengers to tune into local news stations for information regarding **Platteville Public Transportation System's** paratransit and fixed route service.

Lost and Found

The **Platteville Public Transportation System** will not be responsible for items left on vehicles. However, if found, the item(s) will be held for 30 days. If the item is not claimed within 30 days, it may be donated to a local charitable organization.

Passengers attempting to locate lost items should contact **Platteville Public Transportation System**. If the passenger's item has been located, every effort will be made to return the item to the passenger on his/her next scheduled trip.

VI. COMPLAINT PROCESS

How to File a Complaint

Any person who believes she or he has been discriminated against on the basis of disability by the **Platteville Public Transportation System** may file an ADA complaint by completing and submitting the **City of PLATTEVILLE's** ADA Complaint Form.

The complaint may be filed in writing with the **City of PLATTEVILLE** at the following address:

City of PLATTEVILLE

Karen M. Kurt, City Manager
75 N. Bonson St. PO Box 780
PLATTEVILLE, WI 53818-0780
Phone: (608) -348 -9741 ext 2222
Email: citymanager@platteville.org

Note: 49 CFR Part 37.17(b)(1) requires transit agencies to sufficiently publicize the process for filing a complaint (e.g. on a website or in a rider guide).

The **City of PLATTEVILLE** investigates complaints received no more than 180 days after the alleged incident. The **City of PLATTEVILLE** will promptly process complaints that are complete.

Once the complaint is received, the **City of PLATTEVILLE** will promptly review it to determine if its office has jurisdiction. The complainant will receive an acknowledgement letter and/or email informing her/him whether the complaint will be investigated by our office.

The **City of PLATTEVILLE** has 30 days to investigate the complaint. If more information is needed to resolve the case, the city may contact the complainant.

The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the **City of PLATTEVILLE** can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not an ADA violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision, she/he has 10 days after the date of the letter or the LOF to do so. A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

ADA Comment/Complaint Form

The **City of PLATTEVILLE** is committed to providing you with safe and reliable transportation services and we want your feedback. Please use this form for suggestions, compliments, and complaints.

Please submit this form in person at the address below or electronically at Citymanager@platteville.org

City of PLATTEVILLE

75 N. Bonson St. PO Box 780

Platteville, WI 53818-0780

Citymanager@platteville.org

You may also call us at 608-348-9741. Please make sure to provide us with your contact information in order to receive a response.

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				
Transit Service (Choose One) [as applicable] [Bus/Shared-Ride Taxi/Paratransit]*				
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 [Text box on web form for narrative]:				
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)*				
- Email response - Telephone response - Response by U.S. Postal Mail				

List of Transit Related ADA Investigations, Complaints and Lawsuits

The **City of PLATTEVILLE** maintains a list or log of all ADA investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

_____ There have been **no** investigations, complaint and/or lawsuits filed against us during the report period.

_____ There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

Note: Per FTA requirements, the **City of Platteville** retains copies of ADA-related complaints for at least one year and a summary of all ADA-related complaints for at least five years.

	Date (Month, Day, Year)	Complainant's Name/Address	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations					
1.					
2.					
Lawsuits					
1.					
2.					
Complaints					
1.					
2.					

(Sample)

Letter/Email Acknowledging Receipt of Complaint

Date

Ms. Jo Doe
1234 Main St.
PLATTEVILLE, WI

53531 Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the **City of PLATTEVILLE** alleging_____.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning (608) 348 – 9741, Ext 2222, or write to me at this address.

City of PLATTEVILLE

Karen M. Kurt
City Manager
75 N. Bonson St. PO Box 780
PLATTEVILLE, WI 53818-0780

Sincerely,

Karen M. Kurt
City of PLATTEVILLE
City Manager

Sample - Closure Letter

Notifying Complainant that the complaint is not substantiated

Date

Ms. Jo Doe
1234 Main St.
PLATTEVILLE , WI

Dear Ms. Doe:

The matter referenced in your complaint of _____(date) against the **City of PLATTEVILLE** alleging _____ has been investigated.

The results of the investigation did not indicate that the provisions of the Americans with Disabilities Act (ADA) had in fact been violated. As you know, ADA prohibits discrimination in any program receiving federal financial assistance.

The **City of PLATTEVILLE** has analyzed the materials and facts pertaining to your case for evidence of the city's failure to comply with any of the ADA laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not be substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within 10 calendar days of receipt of this final written decision from the **City of PLATTEVILLE**, and/or 2) file a complaint externally with the Federal Transit Administration at:

Federal Transit Administration, Region V
Office of Civil Rights
Attention: Title VI Program Coordinator
200 West Adams Street, Suite 320
Chicago, IL 60606

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Karen M. Kurt
City of PLATTEVILLE
City Manager

Sample – Letter of Finding (LOF)

Notifying Complainant the complaint is substantiated

Date

Ms. Jo Doe
1234 Main St.
PLATTEVILLE , WI

Dear Ms. Doe:

The matter referenced in your letter of _____(date) against the **City of PLATTEVILLE** alleging an Americans with Disabilities Act (ADA) violation has been investigated.

(An/Several) apparent violations of the ADA, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

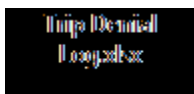
Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. **(If a hearing is requested, the following sentence may be appropriate.)** You may be hearing from this office, or from state or federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Karen M. Kurt
City of PLATTEVILLE
City Manager

City of PLATTEVILLE
Karen M. Kurt
City Manager
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VII. Attachments



Trip Denial Log

Date	Name	Rider ID #	Is the Rider Disabled? Yes/No	Trip Request		Origin	Destination	Reason for Trip Denial	Wait List? Yes/No	Trip Request		Origin	Destination	Reason for Trip Denial	Wait List? Yes/No
				Day	Time					Day	Time				

Notes: FTA C 4701.1

It is noted that **all** trip requests should be recorded, regardless of whether the trip is denied.

The purpose of this log is to track the characteristics of trip denials to help determine the underlying causes in order to take steps necessary to prevent future denials.

Examples of Trip Denials:

Counting the number of trip denials means accounting for **all** trips that the rider is unable to take because of the denial.

1. A rider requests a next-day trip and the transit agency says it cannot provide that trip.
2. A rider requests a next-day trip and the transit agency can only offer a trip that is outside the one-hour negotiating window (before or after the individual's desired departure time). This represents a denial regardless of whether the rider accepts such an offer.
3. A rider requests a round-trip and the transit agency denies a rider the outbound portion of a requested round-trip and only offers a return trip. If the rider then elects not to travel at all, this represents two denials. However, if an agency denies a "going" trip and the rider accepts a return trip, then this is counted as one denial.

Platteville Public Transportation System - No-Show Policy

Transit Agency Instructions

FTA recommends that a transit agency's no-show policy include, at a minimum:

- General policy statement
- Definition of no-shows
- Description of minimum driver wait times within pickup windows
- Definition of late cancellations and how to cancel trips (optional)
- Examples of no-shows (and late cancellations) beyond a rider's control and how riders should communicate such instances
- Statement that no-shows due to transit agency errors do not count
- Statement that subsequent trips after a no-show will not be automatically cancelled, and that passengers need to cancel any trips they do not intend to take
- The transit agency's process to notify riders of recorded no-shows (or late cancellations)
- What constitutes a pattern and practice of excessive no-shows
- Time periods of potential service suspensions
- Instructions for appealing proposed suspensions

General Policy Statement on No-Shows

Platteville Public Transportation System understands that because some trips are required to be scheduled in advance, riders may sometimes miss scheduled rides or forget to cancel rides they no longer need. **Platteville Public Transportation System** also understands that riders may sometimes miss scheduled trips or be unable to cancel trips in a timely way for reasons that are beyond their control. However, repeatedly missing scheduled trips (or failing to cancel trips in a timely way) can lead to suspension of service. The following information explains **Platteville Public Transportation System's** no-show policy.

Definitions: No-Show, Pickup Window, and Late Cancellation

No-show

A no-show occurs when a rider fails to appear to board the vehicle for a scheduled trip. This presumes the vehicle arrives at the scheduled pickup location within the pickup window and the driver waits at least **five (5) minutes**.

Pickup Window

The pickup window is defined as **15 minutes before the scheduled pickup time to 15 minutes after the scheduled pickup time**. Riders must be ready to board a vehicle that arrives within the pickup window. The driver will wait for a maximum of **five (5) minutes** within the pickup window for the rider to appear.

Late Cancellation

A late cancellation is defined as either: a cancellation made less than 1 hour³ before the scheduled pickup time or as a cancellation made at the door or a refusal to board a vehicle that has arrived within

³ FTA permits transit agencies to consider late cancellations as no-shows for trips cancelled less than 1 or 2 hours before the pickup time provided to the passenger at the time the trip was reserved, and only under the same circumstances (i.e., not due to circumstances beyond the rider's control).

the pickup window.

Definition: No-Shows Due to Operator Error or to Circumstances Beyond a Rider's Control⁴

Platteville Public Transportation System does not count as no-shows (or late cancellations) any missed trips due to our error, such as:

- Trips placed on the schedule in error
- Pickups scheduled at the wrong pickup location
- Drivers arriving and departing before the pickup window begins
- Drivers arriving late (after the end of the pickup window)
- Drivers arriving within the pickup window, but departing without waiting the required five [5] minutes

Platteville Public Transportation System does not count as no-shows [or late cancellations] situations beyond a rider's control that prevent the rider from notifying us that the trip cannot be taken, such as:

- Medical emergency
- Family emergency
- Sudden illness or change in condition
- Appointment that runs unexpectedly late without sufficient notice

Riders should contact **Platteville Public Transportation System** staff when experiencing no-shows [or late cancellations] due to circumstances beyond their control.

Policy for Handling Subsequent Trips Following No-shows

When a rider is a no-show for one trip, all subsequent trips on that day remain on the schedule unless the rider specifically cancels the trips. To avoid multiple no-shows on the same day, riders are strongly encouraged to cancel any subsequent trips they no longer need that day.

At the first verified "no-show" or late cancellation, **Platteville Public Transportation System** will notify the rider of the No Show suspension policy and discuss ways to minimize future no-shows or late cancellations.

Suspension Policies for a Pattern or Practice of Excessive No-shows and Late Cancellations

Platteville Public Transportation System reviews all recorded no-shows (and late cancellations) to ensure accuracy before recording them in a rider's account. **Platteville Public Transportation System** reserves the right to suspend from services any rider who establish a pattern or practice of missing scheduled trips.

Each verified no-show (or late cancellation) consistent with the above definitions counts as (1) penalty point. Riders will be subject to suspension after they meet all of the following conditions:

- Accumulate 3 penalty points in one calendar month
- Have booked at least 3 trips that month
- Have "no-showed" or "late cancelled" at least (10%) percent of those trips

⁴ Agencies using this sample as a template for their own no-show suspension policies are advised to first familiarize themselves with the content of ADA Circular, consult with the disability community to develop the variables, and ensure that the variables actually represent a pattern or practice of missing scheduled trips and a reasonable period of suspension.

A rider will be subject to suspension only if both the minimum number of trips booked and the minimum number of penalty points are reached during the calendar month.

Platteville Public Transportation System will notify riders by telephone after they have accumulated three (3) penalty points and would be subject to suspension should they have verified “no shows” of 10% of total booked trips.

All suspension notices include a copy of this policy, information on disputing no-shows [or late cancellations], and how to appeal suspensions. Suspensions begin on [Mondays].

Violations result in the following:

- First violation: Triggers warning phone call and written letter, but no suspension
- Second violation: [7-day] suspension
- Third violation: [14-day] suspension
- Fourth violation: [21-day] suspension
- Fifth and subsequent violations: [30-day] suspension

Note: Suspension Schedule cannot exceed 30 days)

Policy for Disputing Specific No-Shows or Late Cancellations

Riders wishing to dispute specific no-shows [or late cancellations] must do so within 15 business days of receiving suspension letters. Riders should contact the **Platteville Public Transportation System** operations center at 608-348-6767 Monday through Friday from 8:00 a.m. to 5:00 p.m. to explain the circumstance, and request the removal of the no-show or late cancellation.

Policy for Appealing Proposed Suspensions (Sample)

Riders wishing to appeal suspensions under this policy have the right to file an appeal request in-person, via phone, email or US mail within [15] business days of receiving suspension letters. Riders who miss the appeal request deadline will be suspended from **Platteville Public Transportation System** on the date listed on the suspension notice.

All suspension appeals follow **Platteville Public Transportation System** appeal policy.

Employee Training Information

Requirement

US DOT Regulations, specifically 49 CFR part 37, states:

“Each public or private entity which operates a fixed route or demand responsive system shall ensure that personnel are trained to proficiency, as appropriate to their duties, so that they operate vehicles and equipment safely and properly assist and treat individuals with disabilities who use the service in a respectful and courteous way, which appropriate attention to the difference among individuals with disabilities.”

“Each transportation provider is to design a training program which suits the needs of its particular operation.”

Training

The following are examples of personnel training topics appropriate to different duties and responsibilities:

- *Drivers* – Properly operating all accessibility equipment and features; providing appropriate assistance to individuals with disabilities with boarding and securement; communicating effectively with individuals with different types of disabilities; and positioning the vehicle so that the lift or ramp can be deployed and used.
- *Vehicle Dispatchers* – Understanding all operating policies and procedures to effectively and properly assign and route vehicles, assisting drivers on issues that arise pertaining to accessible service and communicating effectively with individuals with different types of disabilities.
- *Vehicle Mechanics* – Maintaining all accessibility equipment on vehicles and keeping maintenance and repair records.
- *Managers and Supervisors* – Understanding all operating policies and procedures and supervising employees to ensure they provide proper and consistent levels of service to individuals with disabilities.

Refresher Training

In addition to the initial job training, **Platteville Public Transportation System** will provide regular refresher training for all appropriate employees. Such training includes, but is not limited to, a discussion of issues from riders or employees, information on new agency policies and procedures, and an overview of accessibility features in newly procured vehicles.

Training Records

Platteville Public Transportation System will maintain training records including information on employee and new hire policy receipt acknowledgement signature forms and records related to passenger assistance training, refresher training, etc.



Employee Acknowledgement:
Receipt of **Platteville Public Transportation System** ADA Policies
and Procedures

I hereby acknowledge the receipt of **Platteville Public Transportation System's** ADA Policies and Procedures.

I have read the plan and I am committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services according to the Americans with Disabilities Act (ADA), as protected by Title VI by the Federal Transit Administration.

Employee Signature

Print Your Name

Date