

**Coshocton County Coordinated Transportation Agency (CCCTA)
ADA Policies & Procedures Plan**

Effective April 29, 2020

Index

ADA Access to Information.....	3
Lift Procedure	4
Discount Fares for E&D Passengers.....	7
No-Show and Trip Cancellations.....	8
Personal Care Attendants	10
Passenger Assistance	11
Service Animals	13
Trip Denial Log	15
Wheelchair Securement	16
Reasonable Modification.....	18
Reasonable Modification Complaint Form.....	23
ADA Complaint Procedure.....	25
ADA Complaint Form.....	27

ADA Access to Information Policy

Directive:

To meet the intent of the Americans with Disabilities Act (ADA) by ensuring that all persons have appropriate access to brochures and Riders Guides.

Procedure:

Brochures and other printed materials are available in alternative formats upon request. Alternative formats include, but are not limited to, large print, audio computer disks.

A statement that the information is available in alternative format will be included on all brochures and printed materials.

A TTY/TDD or the Ohio Relay number (1-800-750-0750) will be included in all printed or internet materials with phone numbers listed. TTY/TDD or the Ohio Relay number will be included in all radio and TV commercials (public service announcements).

Public hearings will be held in accessible locations.

Public hearing notices will include the statement that any person requiring special accommodations should contact the Transit Director, Valerie Shaw at 740.622.7139.

Responsibilities:

The Transit Director is responsible for assuring that public transportation services are provided as noted above.

Lift Procedure Policy

Directive:

To comply with the Americans with Disabilities Act of 1990 in providing equal access to public transportation for persons with disabilities.

Procedure:

It is the practice of CCCTA to attempt to transport any mobility device regardless of shape and size. Special techniques may be required when providing door-to-door service for a passenger in a wheelchair. When assisting non-ambulatory passengers, please follow the procedure outlined below.

Positioning the Vehicle:

- Ensure that the vehicle is parked on level ground and not leaning toward or away from the loading ramp.
- For stopping points close to structures, ensure adequate room for platform deployment and passenger maneuverability.
- Lift platform should rest on concrete or pavement when completely deployed. Avoid loading areas which are soft, wet, slippery, etc.

Lift Deployment:

- Set the vehicle parking break with the transmission in the PARK position and the engine running.
- *(If the vehicle is equipped with a fast-idle option, ensure the switch is ON.)*
- Open the lift door(s) and locate the controls.
- Ensure that the area is clear and the passenger is a safe distance from the extended platform.
- Unfold the platform from the stowed position ensuring that, when extended, the lift is level with the ground.
- *(If the lift is not level when fully extended, report the condition to the Transit Director for repair/maintenance.)*
- Lower the platform to ground level until the roll stop unfolds to allow for loading.

Loading/Unloading the Passenger:

- Inform the passenger that loading will begin. It is important to communicate with the passenger at every point in the loading process to ensure that passengers are prepared for the movement of the lift and the necessary maneuvering inside the vehicle prior to securement.
- Always hold the wheelchair handles when raising and lowering the lift platform.
- Ensure that the passengers' arms and legs are kept as close to the body as possible to avoid injury during operation.
- Back the passenger onto the platform and secure the wheelchair brakes.
(Passengers can face toward or away from the vehicle during the loading process. However, we encourage passengers to load facing away from the vehicle so the heaviest part of the chair is on the strongest part of the lift. Depending upon the vehicle, it is sometimes easier to load passengers if they face a particular

direction. Passengers are permitted to drive themselves onto and off of the lift platform. However, the power source must be turned off while lift is in operation).

- If space permits, ride the lift platform with the passenger. If space is too restrictive, stand alongside the platform while raising and lowering the platform.
- Once the platform is level with the floor of the vehicle, release the wheelchair brakes and back the passenger into position for securement.
- Secure the chair as described in the Securement policy.
- Return the wheelchair to the stow position before setting the vehicle in motion.

Standees:

- CCCTA will allow ambulatory passengers to use the lift for boarding/exiting the vehicle if requested; a mobility device or aid is not required.
- Ensure that the passenger stands in the center of the platform and holds both handrails while the lift is in motion.
- Follow the operation procedures described above.

Manual Operation:

In the event of an electrical malfunction aboard the vehicle, it may be necessary to operate the lift manually by following these instructions:

- Locate the manual operation instructions on or near the pump cover.
- To load/unload a passenger from the vehicle using the manual method, locate the hand pump handle (During your Pre-Trip Inspection always check to make sure the manual handle is present).
- Place the slotted end of the pump handle into the pump, release valve, and turn it counter-clockwise one-half turns.
- Let platform fully unfold until it reaches floor level then turn the pump release valve clockwise to stop the platform. The valve must be tight; making sure not to over tighten.
- Place the passenger on the lift platform within the yellow boundary markings and lock the wheelchairs brakes.
- Turn the pump release valve one-half turn counter clockwise until the platform reaches the ground and the roll stop fully unfolds.
- Release the wheelchairs brakes and move the passenger off the lift.
- To stow the platform back into the vehicle, insert the slotted end of the pump handle into the pump valve and turn it clockwise one-half turns. Remember not to over tighten the valve.
- Remove the pump handle from the release valve and place it into the back-up pump and stroke until the platform reaches floor level.

Low ramp on MMV:

- Set the vehicle parking break with the transmission in the PARK position and the engine running.
- *(If the vehicle is equipped with a fast idle option, ensure the switch is ON.)*

- Open the side lift door.
- Ensure that the area is clear and the passenger is a safe distance from the extended platform.
- Unfold the platform from the stowed position ensuring that, when extended, the lift is level with the ground.
- (If the lift is not level when fully extended, report the condition to the Transit Director for repair/maintenance.)
- Lower the platform to ground level ensuring that the roll stop unfolds to allow for loading.
- Back the passenger onto the platform and into position inside the vehicle, securing the wheelchair brakes when finished.
- (If the wheelchair is electric, ensure that the power is turned off and the transmission is in neutral.)
- Secure the wheelchair as described in the Securement policy

Responsibilities:

The Transit Director and/or Driver Manager is responsible for ensuring all drivers are trained in the procedure.

Discount Fares for Elderly and Disabled Passengers Policy

Directive:

To provide discount fares for elderly and disabled passengers.

Definition:

Elderly - any person 65 years of age or older

Disabled - any person with a mental or physical impairment limiting one or more major life functions.

Procedure:

All persons who are certified eligible for elderly or disabled fare discounts will be able to purchase a one-way trip on the public transit system at the reduced fare of which is half the normal general public fare rate.

All persons requesting this discount must complete the Elderly and Disabled Application and provide written documentation of their age or disability. Applications are available at the CCCTA Office. Applications may be mailed upon request. All applications must be returned to the CCCTA office for approval. Drivers are not permitted to distribute applications.

The Transit Director will review and approve all applications.

All persons who are certified as elderly or disabled for the purpose of this discount will be issued an Elderly and Disabled discount card.

The person will be entered into the database as elderly or disabled and the fare shown on the driver's electronic manifest will be the discounted fare.

Passengers are required to show the E&D discount card upon boarding.

The first card and one replacement card will be issued at no cost. All other replacement cards are available for \$1.00. Replacement cards will be denoted as such.

Responsibilities:

Responsibilities shall be as defined above.

No-Show and Trip Cancellation Policy

Directive:

To assure that the service is operating in the most efficient manner by correcting the action by habitual abusers of services.

Definitions:

Pick-Up Window - the time before and after the scheduled pick-up time that the shuttle may arrive at a scheduled pick-up address.

No-show - Any passenger who is unavailable for pick-up of a scheduled trip that has not notified CCCTA to cancel that trip. Trips in which passengers will not be picked up due to circumstances related to service will not be considered a no-show.

Wait Time - any time spent awaiting passenger boarding after arrival at a scheduled pick-up address.

Procedure:

Passengers should always be ready fifteen (15) minutes prior to their scheduled pick-up time. CCCTA has a 30-minute pick-up window, meaning the bus can arrive fifteen (15) minutes before to fifteen (15) minutes after the scheduled pick-up time.

If a driver is unable to arrive during the established pick-up window, the dispatcher will be notified and the passenger will be contacted with a revised pick-up time.

Upon arrival to a scheduled pick-up address the Driver will wait for passenger(s) for three (3) minutes beyond the scheduled pick-up time. The Driver will make reasonable attempts to locate the passenger(s); including phone call and/or knocking on the door. If the passenger cannot be located within three (3) minutes, the Driver must contact the Dispatcher with the no-show information. The Dispatcher has the responsibility to determine if the driver is to continue without the passenger. Passengers who do not make themselves available within the three (3) minute window will be considered a No-Show.

Cancellations:

Scheduled trips are to be cancelled at least two (2) hours prior to the scheduled pick up time. Any scheduled trip not cancelled within that window will be considered a no-show.

Exceptions may be made for passengers who are unduly delayed due to medical appointments or procedures. The passenger will be required to contact the CCCTA office as soon as possible following the missed trip and a new driver will be dispatched as soon as possible.

Ride Reminders:

Clients with scheduled ride requests will be notified of their exact scheduled pick-up time via an automated telephone call (or text if opted for) the day prior between 3:30 p.m. and 3:45 p.m. They will receive the call again 50 minutes prior to their scheduled pick-up time.

No-Show Guidelines:

Passengers who have 20% or more of their scheduled trips recorded as no-shows or late cancellations within a 60-day period will have their riding privileges suspended for 10 calendar days. The passenger will be notified via telephone informing them of the suspension. The passenger will also be sent a written letter stating they are suspended from service for 10 calendar days as well as a copy of the appeals process that details passenger rights in this situation.

CCCTA will continue to serve passengers appealing pending suspensions until all appeals have been settled. For passengers who do not choose to appeal, suspensions will commence on the date specified in the written notice.

Letters of suspension will contain instructions and materials necessary to challenge or appeal the suspension decision.

All no-show results deemed to have occurred due to circumstances beyond the passenger control (i.e. service failure, medical delay, etc.) will be reversed and removed from consideration during analysis.

Any passenger has the right to file an Appeal of Service Suspension with CCCTA.

Responsibilities:

Responsibilities shall be as defined above.

Personal Care Attendants Policy

Directive:

To provide guidance to persons requiring an accompanying personal care attendant during transit provided trips.

Definitions:

Personal Care Attendant (PCA) - Persons eligible under Americans with Disabilities Act (ADA) regulations must be allowed a personal care attendant. A PCA is someone designated or employed specifically to help the eligible individual meet his or her personal needs.

A PCA is also often referred to as an Aide or Escort.

Procedure:

A disabled passenger may have one (1) personal care attendant (PCA) ride with them at no charge.

To ensure sufficient seating capacity, the passenger should inform the Scheduler when making a reservation that a personal care attendant is required and will be accompanying the passenger.

The PCA is expected to care for the passenger while en-route to the destination.

The PCA must furnish any care over and above routine passenger assistance provided by the Driver.

Use of the PCA is the discretion of the passenger.

Responsibilities:

It is the responsibility of the Scheduler and Driver to ensure compliance with this procedure.

Passenger Assistance Policy

Directive:

To provide guidance for drivers while assisting passengers.

Definitions:

Curb-to-curb: demand response service wherein drivers are required **only** to arrive at a destination to allow for boarding and exiting of the vehicle.

Door-to-door: demand response service wherein drivers are permitted to assist passengers from the threshold of a structure until the passenger has boarded the vehicle and vice versa for exiting.

Procedure:

CCCTA is a door-to-door transportation service. The driver will be permitted to assist (escort) the passenger from the main entrance door of the origin to the main entrance door of the destination.

Drivers are to maintain a line of sight to the vehicle and stay within a reasonable operating perimeter (approximately ten (10) feet) of the vehicle during the execution of their duties as public transit drivers. This distance allows the driver to assist a passenger to board or exit a vehicle and/or operate the lift.

CCCTA Transit has a *one step* policy. Persons using wheelchairs must have a ramp that is clear of hazards and at an angle that does not put drivers at risk of injury. Drivers will not provide assistance if there is more than one step to be maneuvered. Drivers must exercise caution when providing door-to-door service and ensure that the vehicle remains in the line of sight.

Walkways, paths, and ramps must be in good repair, free of ice and snow.

Passengers requiring total assistance may be suggested by administration (but not required) to provide a personal care attendant. Other instances of passenger assistance could include:

- Vision impairments requiring guidance;
- Passengers with mobility aids such as crutches or walkers;
- Passengers with unseen balance problems or inner ear infections;
- Frail or weakened passengers; and
- Passengers in an ambulatory post-surgical status.

CCCTA Transit drivers are encouraged to exercise professional customer service by offering assistance to all passengers.

Responsibilities:

Responsibilities shall be as defined above.

Note: Personal Care Attendants (PCA) ride free.

Drivers are strictly prohibited from entering the passenger's home or any private residence under any circumstances.

Service Animals Policy

Directive:

To provide guidelines for the transport of service animals on transit vehicles.

Definitions:

Service Animal - The ADA defines a service animal as any 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.

If they meet this definition, animals are considered service animals under the ADA regardless of whether they have been licensed or certified by a state or local government.

Service animals perform some of the functions and tasks that the individual with a disability cannot perform for himself or herself. "Seeing eye dogs" are one type of service animal, used by some individuals who are blind. This is the type of service animal with which most people are familiar. There are service animals that assist persons with other types of disabilities in their day-to-day activities. Some examples include:

- Alerting persons with hearing impairments to sounds.
- Pulling wheelchairs or carrying and picking up things for persons with mobility impairments.
- Assisting persons with mobility impairments with balance.

Procedure:

Service animals are permitted to accompany individuals with disabilities in the vehicles and agency facilities. The passenger must be in direct control of the service animal at all times.

It is the responsibility of the passenger to inform the scheduler when scheduling a ride that a service animal will be present. This information is then relayed to the driver through a notation on the manifest.

Dispatchers may ask the following questions:

Is the animal a pet or a service animal?

What service has the animal been trained to perform?

Dispatchers/Drivers may NOT ask the following questions:

What is the passenger's disability?

Does the passenger have proof of certification or other documentation for the service animal?

If a situation occurs, contact the dispatcher immediately for further direction concerning animals.

Responsibilities:

It is the responsibility of the Scheduler and Transit Director to ensure compliance with this procedure.

Trip Denial Log Policy

Directive:

To comply with Americans with Disabilities Act of 1990, a trip denial log will be maintained in order not to deny service to an individual with disabilities solely because the individual's disability results in appearance or involuntary behavior that may offend, annoy, or inconvenience employees of the agency or passengers.

Definitions:

Trip Denial - In a demand response system, a trip denial occurs when a passenger's trip request cannot be accommodated due to capacity constraints. Trip times may be negotiated with the passenger within one hour prior or one hour past the requested time. If the requested trip can only be accommodated outside of this "window," it is a trip denial.

Procedure:

All trip denials shall be logged using the CTS Software.

Trip denials will be compiled quarterly and submitted to ODOT as required.

Responsibilities:

It is the responsibility of the Scheduler and Transit Director to ensure compliance with this procedure.

Wheelchair Securement Policy

Directive:

To comply with the Americans with Disabilities Act of 1990 in providing equal access to public transportation for persons with disabilities.

Procedure:

All CCCTA Transit passengers must wear safety belts at all times while aboard a CCCTA Transit vehicle. All passengers using wheelchairs and other mobility devices will be secured using a four-point tie-down system.

CCCTA Transit cannot deny service to any passenger if the wheelchair or mobility device cannot be secured to the satisfaction of the driver.

When a wheelchair or mobility device is difficult to secure properly, the driver is expected to make every effort at securing before requesting that the passenger transfer to a regular seat. The driver may *request* the passenger transfer to a regular seat, but will not be permitted to require the passenger transfer if proper securement is not possible.

Wheelchairs and other mobility devices are to be secured facing forward.

The four-point tie down system will be used for all mobility devices.

Use the seatbelt (with shoulder restraint), which attaches to the floor if the vehicle is equipped with one.

Ensure that the lap belt stays on.

If the shoulder restraint cannot be used the lap belt alone will suffice; however, these should be rare occasions.

Ensure that the mobility device brakes are applied.

Attach straps to the floor connection points first.

Connect front tie down straps (pull or cam type; not ratchet) to a T-connector or the wheelchair frame on the front half of the wheelchair.

Connect back, ratchet tie-down straps to a T-connector on the back half of the wheelchair.

Do not connect straps to the wheels, footrests, armrest or any detachable or flexible part of the wheelchair. Do not pass the straps through the rear spokes.

A tightened tie-down strap must form a straight line (no slack) at a 45-degree.

Exercise proper bending techniques when securing straps.

Unoccupied wheelchairs (when the passenger has transferred to a seat) must be tied down securely.

Verify straps are secure and that the device does not move.

Electric wheelchairs must have the power turned off while secured.

Reminder:

- ✓ Store loose tie-down straps when not in use.
- ✓ Keep tracks clean and free of dirt and debris.
- ✓ Pull a wheelchair downhill and push when moving uphill.
- ✓ Immediately report any malfunctions with lift equipment to dispatch so that repairs can be scheduled as soon as possible.

Responsibilities:

The Driver Manager and Transit Director are responsible for ensuring all drivers are trained in the procedure.

Reasonable Modification Policy

1. Purpose:

The purpose of the reasonable modification policy is to ensure that Coshocton County Coordinated Transportation Agency offers equal and effective opportunities and access to public transportation services for persons with disabilities and full compliance with the provisions of the Title II of the Americans with Disabilities Act of 1990 and Section 504 of the Rehabilitation Act of 1973.

2. Policy:

Coshocton County Coordinated Transportation Agency (CCCTA) is committed to providing equal access and opportunity to qualified individuals with disabilities in all programs, services and activities. CCCTA recognizes that in order to have equally effective opportunities and benefits, individuals with disabilities may need reasonable modifications to policies and procedures. CCCTA will adhere to all applicable federal and state laws, regulations and guidelines with respect to providing reasonable modifications, as necessary, to afford equal access to programs for persons with disabilities. CCCTA does not discriminate on the basis of disability in admission to, participation in, or receipt of services and benefits under any transit program or activity. CCCTA will take appropriate steps to ensure that persons with disabilities have an equal opportunity to participate.

No qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of CCCTA, or be subject to discrimination by CCCTA. For purposes of this policy the terms “modification” and “accommodation” have the same meaning and are interchangeable.

3. Reasonable Modifications:

A reasonable modification is a change or exception to a policy, practice, or procedure that allows disabled individuals to have equal access to programs, services, and activities. CCCTA will make reasonable modifications to policies, practices and procedures when necessary to ensure access to transit services for qualified individuals with disabilities, unless:

- Making the accommodation would fundamentally alter the nature of the public transportation service.
- Making the accommodation would create a direct threat to the health or safety of other passengers or vehicle operators.
- The individual with a disability is able to fully use CCCTA's service without the accommodation being made.

For the purposes of this section, the term reasonable accommodation shall be interpreted in a manner consistent with the term “reasonable modifications” as set forth in the Americans with Disabilities Act Title II regulations at 28 CFR 35.130(b)(7), and not as it is defined or interpreted for the purposes of employment discrimination under Title I of the ADA (42 U.S.C. 12111-12112) and its implementing regulations at 29 CFR part 1630.

4. Eligibility Criteria:

An individual is eligible to be considered to receive a reasonable modification if that individual has: a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such impairment; or been regarded as having such impairment.

5. Requests for Reasonable Modifications:

CCCTA shall make information about how to contact CCCTA to make requests for reasonable modifications readily available to the public through its website and rider policy guidelines. CCCTA shall follow these procedures in taking requests:

- a. Individuals requesting modifications shall describe what they need in order to use the service.
- b. Individuals requesting modifications are not required to use the term “reasonable modification” when making a request. Personnel at CCCTA will determine if the request represents a reasonable modification and proceed in accommodating the request accordingly.
- c. Whenever feasible, CCCTA requests that individuals make such requests for modifications before CCCTA is expected to provide the modified service.
- d. Where a request for modification cannot practicably be made and determined in advance (e.g., because of a condition or barrier at the destination of a demand response, or deviated-fixed route trip of which the individual with a disability was unaware until arriving), operating personnel shall make a determination of whether the modification should be provided at the time of the request. Operating personnel may consult with CCCTA’s management before making a determination to grant or deny the request.

Requests for accommodation may be made either orally or in writing. The reasonable accommodation process begins as soon as the request for accommodation is made.

The request can be submitted in any written format. Alternative means of filing a request, such as personal interviews, phone calls, or taped requests, will be made

available for persons with disabilities if unable to communicate their request in writing or upon request.

6. Interactive Process:

When a request for accommodation is made, CCCTA and the individual requesting an accommodation must engage in a good faith interactive process to determine what, if any accommodation shall be provided. The individual and the CCCTA must communicate with each other about the request, the process for determining whether an accommodation will be provided, and the potential accommodations. Communication is a priority throughout the entire process.

7. Time Frame for Processing Requests and Providing Reasonable Modification:

CCCTA will process requests for reasonable accommodation and then provide accommodations, where appropriate, in as short a time frame as reasonably possible. CCCTA recognizes, however, that the time necessary to process a request will depend on the nature of the accommodation(s) requested and whether it is necessary to obtain supporting information.

8. Granting a Reasonable Modification Request:

As soon as CCCTA determines that a reasonable accommodation will be provided, that decision shall be immediately communicated to the individual. This notice must be in writing in order to maintain the required information for reporting purposes. Upon request, alternative means of response will be provided.

In choosing among alternatives for meeting nondiscrimination and accessibility requirements with respect to new, altered, or existing facilities, or designated or specified transportation services, CCCTA shall give priority to those methods that offer services, programs, and activities to qualified individuals with disabilities in the most integrated setting appropriate to the needs of individuals with disabilities.

9. Denying a Reasonable Modification Request:

As soon as CCCTA determines that a request for reasonable accommodation will be denied, CCCTA will communicate the basis for the decision in writing to the individual requesting the modification. The explanation for the denial will clearly state:

- a. the specific reasons for the denial;
- b. any alternative accommodation that may create the same access to transit services as requested by the individual; and

- c. the opportunity to file a complaint relative to the CCCTA's decision on the request.

10. Complaint Process:

CCCTA has a process for investigating and tracking complaints from qualified individuals. These procedures shall be posted on the CCCTA's website and will be provided to any individual where the CCCTA has denied a request for accommodation. The process and any forms necessary to file a complaint are readily available from the web. Alternative means of filing complaints, such as personal interviews, phone calls, or taped requests, will be made available for persons with disabilities if unable to communicate their request in writing or upon request.

Any person who believes she or he has been discriminated against in obtaining a reasonable modification may file a complaint by completing and submitting a CCCTA's Reasonable Modification Complaint Form. CCCTA investigates complaints received no more than 30 days after receipt. CCCTA will process complaints that are complete. Once the complaint is received, the complainant will receive an acknowledgement of receipt. If more information is needed to resolve the complaint, CCCTA may contact the complainant. The complainant has 30 business days from the date of the letter to send requested information to CCCTA.

If CCCTA is not contacted by the complainant or does not receive the additional information within 30 business days, the CCCTA may administratively close the complaint. In addition, a complaint may be administratively closed if the complainant no longer wishes to pursue their case.

After CCCTA investigates the complaint, a decision will be rendered in writing to the complainant. CCCTA will issue either a Letter of Closure or Letter of Finding.

- a. *Letter of Finding* - This letter will summarize the complaint, any interviews conducted regarding the complaint, and explains what actions will be taken by CCCTA to address the complaint.
- b. *Letter of Closure* - This letter will explain why CCCTA has determined that the complaint does not merit accommodation under the Americans with Disabilities Act and that the complaint will be closed.

If the complainant disagrees with the decision of CCCTA, an opportunity to appeal the decision may be pursued provided the complaint files notice of appeal within 21 days of the initial decision of CCCTA.

In the event of appeal, the complainant will be granted all due process, including the ability to be present additional evidence, present the case in person during an appeal hearing, and to be represented by counsel.

11. Designated Employee:

CCCTA shall designate one official within the organization responsible for processing reasonable modification requests and handling complaints. This individual is:

Valerie Shaw, Transit Director
CCCTA
401 Main Street
Coshocton, OH 43812
740-622-7139
valerieshaw@coshoctoncounty.net

12. Record Retention:

CCCTA will maintain all records related to reasonable modification requests and denials for at least three (3) years.

Reasonable Modification Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Email Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party: _____				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
<p>Date that Reasonable Modification was denied: (Month, Day, Year): _____</p> <p>Explain as clearly as possible what happened and why you believe you should have received the modification request. Describe all persons who were involved. Include the name and contact information of the person(s) (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form. You may attach any other items that you think are relevant.</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>				
Section IV				
Have you previously filed an ADA complaint with this agency?			Yes	No

Signature and date required below. Please submit the form in person or via mail/email.

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Coshocton County Coordinated Transportation Agency
Attn: Valerie Shaw, Transit Director
401 ½ Main Street
Coshocton, OH 43812

ADA Complaint Procedure

The DOT ADA regulations require public transportation providers to have procedures in place for promptly and equitably resolving disability related complaints filed by their customers. The required elements of the local complaint process, which are outlined in 49 CFR 37.17 and Section 12.7 of the FTA's ADA Circular, include sufficiently advertising the process to the public.

All ADA disability related complaints shall be sent to CCCTA's ADA Coordinator:

Coshocton County Board of Commissioners
CCCTA ADA Coordinator
Mary Beck
401 Main Street
Coshocton, OH 43812
740-622-7139
marybeck@coshoctoncounty.net

Upon receipt of an ADA disability related complaint, CCCTA's procedure will be as followed:

- A. CCCTA will immediately notify our ODOT representative.
- B. CCCTA will promptly communicate its response to the complaint allegations, including its reasons for the response, to the complainant and must ensure that it has documented its response. The communication can be written, via letter or email.
 - CCCTA will keep the documented response in its internal records or database.
 - CCCTA will keep all complaints of noncompliance on file for one (1) year and a record of all such complaints (in summary form) for five (5) years.
 - CCCTA will use professional knowledge to distinguish between complaints that pertain to DOT ADA requirements versus general complaints about service or policies even if the complaint has a disability.
- C. CCCTA has 15 business days to investigate the complaint. If more information is needed to resolve the case, CCCTA may contact the complainant. The complainant has 15 business days from the date of the letter or documented contact 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 15 business days, CCCTA can administratively

close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

- D. After the investigator reviews the complaint, she/he will issue one of two 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. An 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 15 business days after the date of the closure letter or the LOF to do so.
- E. For transportation-related ADA matters, a person may also file a complaint directly with the Ohio Department of Transportation, at ODOT Office of Equal Opportunity, Attention: ADA Coordinator, 1980 West Broad Street, Columbus, OH 43223.

List of Transit-Related ADA Investigations, Complaints, and Lawsuits

Period: April 28, 2017 - April 29, 2020.	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations	None			
1.				
2.				
Lawsuits	None			
1.				
2.				
Complaints	None			
1.				
2.				

ADA Complaint Form

[illegible]

Section IV		
Have you previously filed an ADA complaint with this agency?	Yes	No
Section V		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all that apply: <input type="checkbox"/> Federal Agency: _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		
Section VI		
Name of agency complaint is against:		
Contact person:		
Title:		
Telephone number:		

You may attach any written materials or other information that you think is relevant to your complaint. Signature and date required below.

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Coshocton County Board of Commissioners
 Attn: Mary Beck, CCCTA ADA Coordinator
 401 ½ Main Street
 Coshocton, OH 43812

Signature Page

Valerie Shaw
CCCTA Director, Valerie Shaw

4/29/2020
Date

Donal Shynal
Coshocton County Commissioner, Chairman

4-29-20
Date

Donal Shynal
Coshocton County Commissioner

4-29-2020
Date

D Curtis Lee
Coshocton County Commissioner

4-29-20
Date

Approved Commissioners Journal 56 Page 367

