

American with Disabilities Act of 1990 (ADA) Plan

25 E. South St., Jackson, Ohio 45640

www.jacksoncountyjfs.org



Jackson County JOB & FAMILY SERVICES

Americans with Disabilities Act of 1990 (ADA)

ADA Policy and Demand Response Service Procedures

Introduction and Purpose

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 regulations for implementing the ADA (49 CFR Parts 27, 37, and 38), and applicable Ohio laws and regulations.

Jackson County Public Transit (JCPT) operates curb-to-curb service, with door-to-door service available upon request, as a demand-response transportation service that is scheduled in advance and complies with ADA requirements applicable to such services.

Service Classifications:

The JCPT service is offered to all members of the public, not solely to persons with disabilities. Therefore, the service is classified as “demand response,” and JCPT is not required to provide ADA complementary paratransit service.

Policy Statement

Jackson County Public Transit (JCPT) is committed to full compliance with all applicable federal and state laws and regulations pertaining to individuals with disabilities. JCPT provides safe, reliable, and high-quality transportation services to all members of the public without discrimination, including individuals with disabilities. Passengers are expected to conduct themselves in a manner that does not interfere with the safe operation of the vehicle, the safety of others, or the delivery of transit services. Passengers are subject to corrective action, up to and including suspension of service, if their behavior is violent, seriously disruptive, or illegal.

Discrimination on the basis of disability by JCPT employees, contractors, or agents is strictly prohibited and will not be tolerated under any circumstances.

I. Goals

Transportation services are provided in a manner that achieves the following objectives:

1. Ensure safe, accessible, and dignified transportation for all individuals, including persons with disabilities.
2. Facilitate the safe and efficient boarding, securement, transportation, and alighting of all passengers, regardless of mobility status.
3. Accommodate a broad range of mobility devices within the operational limitations of available vehicles and commercially standard equipment.
4. Minimize the risk of damage to passengers' mobility devices and to Jackson County Public Transit equipment during service delivery.

Applicability

This policy applies to all employees of Jackson County Public Transit (JCPT) and governs the operation of all JCPT services, facilities, and vehicles. The policy applies equally to all individuals who require or use transportation services provided by JCPT.

II. Definitions

Three- or Four-Wheeled Device (formerly common wheelchair):

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

Commuter Service:

A transportation service in which vehicles operate along a prescribed route and fixed schedule. Service is predominantly provided in one direction during peak travel periods, with limited stops and extended route lengths, typically between a central business district and outlying areas. Commuter service may also be characterized by limited route structure, limited stops, and coordinated connections with other modes of transportation.

Disability:

An individual with a disability is defined by the Americans with Disabilities Act (ADA) as a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a record or history of such an impairment, or a person who is regarded as having such an impairment.

Fixed Route Service:

A transportation service in which vehicles operate along a prescribed route according to a fixed schedule.

Mobility Aid/Non-Wheelchair Mobility Device:

A device used by an individual with a mobility impairment to assist with movement that does not meet the ADA definition of a three- or four-wheeled device. Such devices include, but are not limited to, canes, crutches, and walkers, when used by a person with a mobility-related disability.

Demand Response Service:

A transportation service characterized by flexible routing and scheduling, typically using smaller vehicles to provide point-to-point transportation. Demand response services generally require advance reservations and may be provided on a curb-to-curb or door-to-door basis. This service may also be referred to as paratransit or dial-a-ride service.

Securement Equipment:

Equipment designed to secure three- or four-wheeled devices against uncontrolled movement during transportation.

Securement Station:

A designated area within a transit vehicle specifically designed to secure and stabilize three- or four-wheeled devices.

Service Animal:

An animal that is individually trained to perform specific tasks or work for the benefit of an individual with a disability.

III. General Guidance and Procedures

Recruitment and Employment

As stated in the personnel policy and procedures manual, the agency is an Equal Opportunity Employer and fully complies with the Americans with Disabilities Act (ADA) in all recruitment, hiring, and employment practices, including continued employment and reasonable accommodations.

Facility and Vehicle Accessibility

The Jackson County Public Transit System administrative facility, passenger facilities and vehicles shall meet or exceed the requirements of 49 CFR Parts 27, 37 and 38 and requirements of the State of Ohio. If state requirements do not meet federal requirements, the federal ADA regulations prevail. All vehicles purchased for fixed route and route deviation service will be accessible. Vehicles purchased for demand response service will only be non-accessible to the extent that the demand response system, when viewed in its entirety, provides the same level of service for individuals with disabilities as for individuals without disabilities. The transit system will conduct an analysis of service equivalency prior to the acquisition of any inaccessible vehicles for demand-responsive service.

Vehicle and Route Assignment (Equivalent Service)

- ✓ All demand response vehicles operated by the Jackson County Public Transit are accessible and persons with disabilities, including wheelchair users, can board any vehicle. To the extent possible, the assignment of particular types of vehicles will be based upon rider needs.
- ✓ The demand response system of the Jackson County Public Transit, when viewed in its entirety, is accessible. All trips by wheelchair users will be assigned to accessible vehicles. To the extent possible, the assignment of particular types of vehicles will be based upon rider needs. Trip denials will be tracked by whether or not a rider requires use of the lift or ramp, to monitor that service is not disproportionately denied to individuals with disabilities because an accessible vehicle is not available. ABC Transportation Company provides demand response rural public transportation and provides equivalent service to individuals with disabilities, that is consistent with U.S. DOT ADA regulations under 49 CFR Part 37, Section 37.77. This transportation will be provided in the most integrated setting appropriate to the needs of the individual and will be equivalent to the service provided other individuals with respect to: Response time, Fares, Geographic area of service, Hours and days of service, Restrictions or priorities based on trip purpose, Availability of information and reservations capability, and Any constraints on capacity or availability.

Maintenance of Accessible Features

Accessibility features on JCPT vehicles, including lifts, ramps, wheelchair securement systems, and public address systems, shall be maintained in proper working conditions. JCPT's preventive maintenance program includes regular inspection, testing, and servicing of all accessibility-related

equipment in accordance with manufacturer recommendations. Vehicle lifts shall be cycled during each pre-trip inspection. Drivers are required to report lift or accessibility equipment failures immediately.

Boarding

Drivers and scheduling practices shall allow adequate time for passengers with disabilities to safely board and alight from vehicles. Schedules may be adjusted as necessary to accommodate passengers who require additional time, and drivers shall ensure passengers are safely seated before the vehicle is placed in motion. Upon arrival at the pick-up location, the driver shall determine the safest boarding location based on environmental conditions and the passenger's individual needs.

Personal Care Attendants

Under the ADA, an agency cannot require a passenger to have a personal care attendant (PCA). If a PCA accompanies a passenger, the PCA will ride free of charge. A family member or friend is not considered a PCA, unless that individual is acting in that capacity.

Passengers and/or their attendants are responsible for maneuvering the passenger and mobility device to the vehicle. Only properly trained JCPT employees may operate vehicle lifts and secure mobility devices.

Use of Accessibility Devices by Passengers Not Using a Wheelchair

Passengers with disabilities who do not use wheelchairs or other seated mobility devices may use the vehicle lift or ramp to board or alight upon request.

Priority Seating

Except for designated wheelchair securement locations, JCPT does not require passengers to sit in specific seats. However, JCPT reserves the right to require a passenger to sit in a designated area if necessary to ensure the safety of other passengers or the vehicle operator. Priority seating for individuals with disabilities is clearly identified by permanent signage in each vehicle. If a priority seat is occupied when requested by a passenger with a disability, the driver shall request that the seat be made available.

Driver Assistance

Drivers shall provide assistance to passengers with disabilities upon request. This assistance may include exiting the driver's seat to assist with ramps, lifts, securement systems, and other accessibility features. Drivers are required to properly use all accessibility-related equipment installed on JCPT vehicles.

Securement

The securement of three- or four-wheeled mobility devices is the responsibility of the driver. Drivers shall be trained in the proper use of all securement systems in accordance with manufacturer specifications. JCPT policy requires that drivers make reasonable efforts to secure mobility devices before transport. If a mobility device cannot be fully secured due to design limitations, the passenger shall still be permitted to ride. Drivers may not deny service solely because a mobility device cannot be secured; however, drivers must inform passengers of the

potential safety risks associated with riding without securement. Passengers who refuse to allow proper securement may be denied service. Mobility devices shall be secured only in designated securement areas.

Disruptive Behavior Definition

Disruptive Behavior as related to this policy includes actions that interfere with the safe and orderly operation of a transit vehicle or facility. These actions include things like:

- Physical violence or threats toward passengers or employees.
- Harassment, intimidation, or discriminatory behavior.
- Actions that prevent the driver from safely operating the vehicle.
- Destruction or defacement of transit property.
- Behavior that creates an unsafe or hostile environment.

Behavioral Expectations

Passengers must:

- Follow operator instructions at all times.
- Remain seated while the vehicle is in motion (unless boarding/alighting).
- Maintain personal hygiene that does not unreasonably interfere with other passengers' use of the service.
- Refrain from using abusive, obscene, or threatening language.
- Avoid loud, unruly, or physically aggressive behavior.

Suspension & Appeals Process

Reference the agency Suspension and Appeals Policy for complete details reg. Highlights include:

1. Written Notice: A letter will be provided to the passenger (and, if applicable, their guardian or advocate) describing the specific incident(s) leading to suspension, the duration of suspension, and the passenger's appeal rights.
2. Appeal Rights: Passengers have the right to appeal within 10 business days of the notice. Service will continue during the appeal process unless there is an ongoing direct threat. Written notice of a final decision will be issued.
3. Reinstatement: Passengers may be reinstated earlier if they demonstrate that the disruptive behavior has been addressed.

Note: Suspensions will be established for a "reasonable amount of time" based on the severity

of the issue.

No Show

This portion of the policy is intended to address the actions by habitual abusers of service scheduling and provide clear protocols for addressing passengers who fail to show for their scheduled trip without properly canceling the trip. This policy is intended to address those repeat offenders, and not the occasional incident that may occur with some passengers.

No-show – Any passenger who is unavailable for pick-up of a scheduled trip that has not notified JCPT 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.

NO-SHOW PROCEDURE

The JCPT will wait for passengers for 5 minutes beyond the early arrival pick-up time window. The transit operator will make reasonable attempts to locate the passenger. If the passenger cannot be located within the established 5 minutes, the transit operator must contact the Dispatcher with the no-show. Passengers who do not make themselves available within that window will be considered a no-show. The Dispatcher has the responsibility to determine if the transit operator is to continue without the passenger.

Upon permission to continue without the passenger, the transit operator is to record the arrival time, departure time, and vehicle mileage on the Daily Manifest.

Scheduled trips are to be cancelled at least one (1) hour prior to the time of the trip request. Any scheduled trip not cancelled within that window will be considered a no-show and will be logged as such. A no-show designation for a trip will be monitored to determine the habitual nature of no-shows associated with a passenger.

Exceptions may be made for passengers who are unduly delayed due to medical appointments or procedures and other circumstances beyond their control. The passengers will be required to contact JCPT as soon as practicable following the missed trip and a new driver will be dispatched as soon as possible if applicable.

HABITUAL NO-SHOW PROCEDURE

Passengers who have no-shows equal to or greater than 25% of the scheduled trips in a thirty (30) day period will be provided with a written warning. In order to be subject to a warning or suspension, a passenger must have booked a minimum of three (3) trips or more in a calendar month. *Example: If a passenger books five (5) trips and no-shows 25% of the time, they will be in violation of the no-show policy and subject to the progressive corrective action plan.*

A passenger will be subject to the progressive corrective action plan only if both the minimum number of trips booked and the minimum number of no-shows are reached during a calendar month. All suspension periods will begin on a Monday.

The length of a passenger's suspension will adhere to the progressive corrective action plan described as follows:

- First violation in a rolling 6-month period: Verbal Warning
- Second violation in a rolling 6-month period: Final Warning Letter
- Third violation in a rolling 6-month period: 7 days
- Fourth violation in a rolling 6-month period: 14 days
- Fifth violation in a rolling 6-month period: 21 days
- Sixth and subsequent violations in a rolling 6-month period: 30 days

All penalties imposed under this policy are first subject to an appeals process (see Appeals Process). Before any suspension, the potentially affected individual will receive written notice that transportation service will be suspended beginning fourteen (14) days from the date of notice. The individual will receive a copy of the appeals process that details passenger rights in this situation. The written notice of suspension will contain instructions and materials necessary to challenge or appeal the suspension decision.

JCPT 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.

Subscription/Standing Order reservations may be denied upon a second suspension in any consecutive 6-month period. Privileges may be reinstated without guarantee of the original subscription/standing order.

Suspension Appeals Process

A suspension may result from violations of passenger behavior rules, violation of the no-show policy, or for other inappropriate or disruptive behavior. Regardless of the reason for suspension, each passenger has a right to appeal the decision through an appeals process.

Appeals must be submitted in writing to Tammy Osborne-Smith, Director, by mail at 25 E. South St, PO Box 1006, Jackson, Ohio 45640 within 14 days of notification of suspension. All passengers will be permitted to continue using service during the appeals process. JCPT management will inform all schedulers/dispatchers that the suspension is pending an appeal and to allow service to continue for the affected passenger.

An Appeals Committee will review all applicable information from JCPT and the involved passenger. All passengers will be offered the opportunity to speak directly with Committee members and/or the Transit Manager regarding the submitted appeal and/or circumstances that led the suspension and subsequent appeal.

After a thorough review of all available information and testimony, the Appeals Committee will have 72 hours in which to issue a recommendation to sustain or reverse the suspension. The

Committee recommendation will be forwarded to the Transit Manager for final review and implementation.

The JCPT administration will have three (3) days to issue a final suspension decision in writing to the passenger involved. All final decisions will be implemented within seven (7) days of passenger notification.

All communications will be made available in alternate format upon request.

Seat Belt Usage

When riding in a JCPT vehicle, seat belts and shoulder harnesses are required for ALL passengers.

Exception: A passenger may have a condition in which the seat belt and/or shoulder harness could pose a health hazard. In those instances, the passenger may provide documentation from their medical professional indicating the need for an exemption to the seat belt requirement. These passengers should not ride in the front seat of a vehicle if the exemption is made.

Non-Standard Mobility Devices

Mobility devices that do not meet the ADA definition of a three- or four-wheeled device will be accommodated to the extent that vehicle lifts, ramps, and securement areas can safely do so. Passengers are responsible for the handling and stability of such devices, which must not interfere with the safe operation of the vehicle or the transportation of other passengers.

Accommodation of Portable Oxygen

Passengers may travel with respirators and portable oxygen supplies on board JCPT vehicles, in accordance with applicable U.S. Department of Transportation hazardous materials regulations.

Transfer to Fixed Seating

Passengers using seated mobility devices may choose to transfer to fixed seating once on board. Drivers may recommend, but shall not require, passengers to transfer from a mobility device to fixed seating.

Service Animals

In compliance with 49 CFR Part 37, JCPT permits trained service animals to accompany passengers with disabilities. Drivers shall not require documentation or proof of training but may ask what work or tasks the service animal has been trained to perform. Animals that are not under the passenger's control, or those that become a threat to others, may be restricted from riding on the JCPT.

Alighting

The driver is responsible for determining that the passenger drop-off location is safe for alighting. Passengers who use a vehicle lift shall be permitted to disembark at any requested stop unless the lift cannot be safely deployed, deployment would result in damage to the equipment, or conditions at the stop would pose a safety risk to passengers or the operator. The driver shall unsecure the three- or four-wheeled mobility device and operate the lift to return the passenger to ground level. Once the mobility device has fully exited the vehicle, the passenger and/or their attendant is responsible for maneuvering the device away from the vehicle.

Staff Training

All JCPT drivers and staff shall receive training to skill in the proper use of accessibility equipment, applicable operating policies, and service requirements. Training shall also include instruction on assisting and interacting with individuals with disabilities in a respectful, courteous, and sensitive manner. Maintenance personnel shall be trained to properly inspect, service, and maintain lifts and

other accessibility-related equipment.

Stop Announcements

Drivers and JCPT staff shall announce all designated point stops. On routes serving multiple lines or destinations, drivers shall provide verbal external route identification announcements. Drivers shall also announce all stops or specific stops upon request by a passenger.

Rider Information – Alternative Formats

All printed rider information and public materials shall be made available in accessible alternative formats upon request, including but not limited to large print, audio, and accessible electronic formats, to accommodate individuals with visual or other disabilities.

Complaint Procedure

All complaints alleging discrimination on the basis of disability shall be promptly, thoroughly, and objectively investigated by the JCPT Transit Coordinator. Complaints and investigation findings shall be forwarded to the Jackson County Board of Commissioners. Appropriate corrective or disciplinary action shall be taken for conduct that violates this policy, up to and including termination of employment. (See Attachment A.)

Reasonable Modification of Policy

Passengers may request reasonable modifications to JCPT policies, practices, or procedures when necessary to accommodate a disability. Requests for reasonable modification may be submitted to the JCPT Transit Coordinator. JCPT shall make reasonable efforts to work collaboratively with the individual to identify an appropriate and effective accommodation, consistent with ADA requirements.

Pick-Up Procedures

Passengers shall be assigned a scheduled pick-up time. Riders are required to be at the curb outside of their trip origin and ready to board at the scheduled pick-up time. Door-to-door service may be provided upon request. Vehicles operating under route deviation service are unable to wait for passengers who are not present at the designated pick-up location at the scheduled time.

Passenger Assistance

Demand response services are provided on a first-come, first-served basis. JCPT drivers shall assist passengers with disabilities as needed during boarding and alighting and with the securement of mobility devices. All drivers operating JCPT services receive comprehensive training in passenger assistance techniques and disability sensitivity.

Inoperative Lifts

Drivers are required to report lift or ramp failures immediately. Vehicles with inoperative lifts will be removed from service and replaced with an accessible vehicle until the inoperative lift is repaired. For vehicles equipped with ramps, it may be possible to continue in service as long as the ramp can be and is 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.

If there is no spare vehicle available to take the place of a vehicle with an inoperable lift, such that

taking the vehicle out of service will reduce the transportation service JCPT is able to provide, JCPT may keep the vehicle in service with an inoperable lift for up to, but no more than:

5 days – since JCPT serves an area of 50,000 or less in total population.

In any case in which a vehicle is operating on a fixed route with an inoperative lift, and the headway to the next accessible vehicle on the route exceeds 30 minutes, then the agency would promptly provide alternative transportation to individuals with disabilities who are unable to use the vehicle because its lift does not work.

Staff Training

JCPT ensures that all personnel—including drivers, dispatchers, maintenance staff, and administrative personnel—are trained to proficiency as appropriate to their specific duties. Proficiency is defined as the demonstrated ability to operate vehicles and accessibility equipment safely and to treat individuals with disabilities in a respectful, courteous, and sensitive manner. To maintain this standard, the Agency provides:

Role-Specific Training: Drivers are trained in technical skills like wheelchair securement and lift operation, while dispatchers are trained in effective communication and reservation procedures.

Technical and Human Relations Instruction: Training covers both the mechanical use of equipment and the importance of person-first language and disability etiquette.

Ongoing Verification: The Agency will provide refresher training as necessary to ensure that employees' skills do not diminish over time.

Documentation: A record of completed training and a certificate of proficiency for each employee will be maintained in their personnel file.

Eligibility Certification

JCPT does not require an ADA eligibility certification process, as its demand response services are open to the general public and are not limited to individuals with disabilities.

JCPT ADA Complaint Form (Attachment A)

Title II of the Americans with Disabilities Act

Please complete this form, sign and return to: JCPT, PO Box 1006, 25 E. South St., Jackson, Ohio 45640

Complainant Street Address:		
City:	State:	Zip Code:
Telephone (Primary):		Cell:
Person filing the complaint (if other than the complainant):		
Street Address:		
City:	State:	Zip Code:
Telephone (Primary):		Cell:
Department/Agency which you believe has been discriminated:		
Address of the Agency:		
City:	State:	Zip Code:
Telephone (Primary):		Secondary:
Date of the reported event:		
Please share a description of the event, please provide names of individuals involved.		
Has the complaint been filed with the Ohio Civil Rights Commission or the Federal Department of Justice or any other Federal agency or court? ☐ Yes ☐ No		
If yes, please include the following:		
Agency or Court:		
Agency or Court Contact:		
Address (Agency or Court):		
City:	State:	Zip Code:
Telephone (Primary):		
Date Filed:		

Do you intend to file with another agency or court? ☐ Yes ☐ No		
Name of the Agency or Court:		
City:	State:	Zip Code:
Telephone (Primary):		
Additional information (if applicable):		

Signature: _____ Date: _____

Return to:

Tammy Osborne-Smith, Director
 Jackson County Job and Family Services
 PO Box 1006, 25 E. South St.,
 Jackson, Ohio 45640
 Phone: 740.688.4181
 Email: Tammy.Osborne-Smith@jfs.ohio.gov

IV. Signatures

The ADA Policy for Jackson County Public Transit has been reviewed and approved by the Jackson County Department of Job and Family Services.



Tammy Osborne-Smith, Director

12.15.2025

Date

Resolution _____

Wednesday, _____

The ADA Policy for Jackson County Public Transit has been reviewed and approved by the Jackson County Board of Commissioners.

Jon Hensler, President

Date

Donnie Willis, Commissioner

Date

Paul Haller, Commissioner

Date

Attested by:

Carla Marcum, Administrator

Date