



COMPLIANCE POLICY

ADA Written Service Requirements

1. Maintenance of Accessible Features

49 CFR 37.161 and 37.163 | CTDOT Policy PT-28

The Provider will maintain in operative condition all features of vehicles and facilities required for accessibility. These include lifts, ramps, bridge plates, securement systems and areas, passenger restraints where provided, elevators, accessible signage, stop-announcement and communication systems, and other accessibility-related equipment.

Required procedures

- Operators will inspect lifts or ramps, securement equipment, communication equipment, and other accessibility features during every required pre-trip inspection. The inspection will be recorded on the vehicle inspection report.
- Any failure discovered before or during service will be reported immediately by the most direct available means to dispatch or supervision. The defect will be documented and maintenance notified promptly.
- Damaged or out-of-order features will receive high-priority, prompt repair. The Provider will take reasonable steps to accommodate riders who otherwise would use the feature.
- When a lift or ramp is inoperative, an available accessible spare vehicle will be substituted before the next service day. A vehicle will not return to normal service until the feature is repaired and verified.
- If no accessible spare is available and removal would reduce service, any continued operation will follow 49 CFR 37.163 and the stricter CTDOT requirement applicable to the service. Under CTDOT Policy PT-28, a bus with an inoperative lift or ramp may not remain in service for more than three days.
- If the next accessible fixed-route vehicle is more than 30 minutes away, dispatch will promptly arrange alternative accessible transportation for a rider unable to board because the lift or ramp is inoperative.

Safety rule: An isolated or temporary interruption for maintenance or repair is permitted, but it may not result from a failure to inspect, maintain, report, or promptly repair an accessible feature.

2. Lift and Securement Use

49 CFR 37.165

The Provider will transport individuals who use wheelchairs and other mobility devices when the lift or ramp and vehicle can accommodate the device and occupant within the equipment manufacturer's specifications and legitimate safety requirements.

Operator requirements

- Deploy and operate lifts, ramps, and securement systems safely and provide hands-on or verbal assistance when necessary or requested. Personnel will leave their seats when needed to provide assistance.
- Do not require a rider to transfer from a wheelchair to a vehicle seat. A transfer may be recommended, and assistance may be offered, but the decision remains with the rider.
- Permit a rider with a disability who does not use a wheelchair, including a standee, to use the lift or ramp unless a lawful equipment-specific exception applies.
- Use designated securement locations where they exist. Ask occupants of fold-down or movable seats in the securement area to move when the area is needed by a rider with a disability.
- Do not lift, push, pull, or handle a rider or mobility device in a manner that creates an avoidable risk. Follow the equipment manufacturer's operating limits and trained procedures.

A wheelchair and occupant may be refused only when their combined weight exceeds the lift specification or carriage would be inconsistent with legitimate safety requirements - never because the mobility device looks unusual or is difficult to secure.

3. Service Animals

49 CFR 37.3 and 37.167(d)

Service animals are permitted to accompany individuals with disabilities in vehicles and transportation facilities. A service animal is an animal individually trained to work or perform tasks for an individual with a disability. The animal may ride with its handler without a pet fee, deposit, carrier, identification card, certification, or advance notice.

Personnel practices

- When the animal's status is not apparent, personnel may make only limited, respectful inquiries to determine whether it is a service animal and what work or task it has been trained to perform. Personnel will not ask about the rider's diagnosis or demand a demonstration.
- The service animal should remain under the handler's control and may occupy the floor space at the handler's feet or another safe location. The animal may not block an aisle, lift, ramp, doorway, or emergency exit.
- A service animal may be excluded only when it is out of control and the handler does not take effective action, it poses a direct threat to the health or safety of others, or another specific legal basis applies. Fear, allergy, or the presence of another animal is not by itself a reason to deny service.
- If an animal is lawfully excluded, the rider will still be offered transportation without the animal. Personnel will contact a supervisor before exclusion whenever circumstances allow.

4. Lift Deployment at Any Designated Stop

49 CFR 37.167(e) and 37.167(g)

Operators will deploy the lift or ramp at a designated stop when needed or requested by an individual with a disability and will use all required accessibility features. A rider who uses a lift will not be refused disembarkation at a designated stop unless one of the limited conditions below exists.

Limited exceptions

- The lift or ramp cannot be deployed at the stop.
- Deployment would damage the lift or ramp.
- Temporary conditions at the stop, outside the Provider's control, prevent safe use of the stop by all passengers.

A stop will not be treated as unsafe solely because the boarding area is unpaved, lacks a curb, or is inconvenient. The operator will assess the actual conditions, communicate with the rider, and contact dispatch when assistance or an alternative accessible location is needed. Any refused deployment or alternate stop will be reported and documented.

5. Service to Persons Using Respirators or Portable Oxygen

49 CFR 37.167(h)

The Provider will not prohibit an individual with a disability from traveling with a respirator or portable oxygen supply when carried consistently with applicable U.S. Department of Transportation hazardous materials rules. Service will not be denied solely because a rider uses oxygen or a respirator.

Safe accommodation

- Allow the rider to keep medically necessary equipment within reach when it can be positioned safely and does not block aisles, doors, lifts, ramps, securement equipment, or emergency exits.
- Secure portable oxygen cylinders or other equipment against movement using the rider's carrier or another safe method that does not damage the equipment or interrupt its operation.
- Do not disconnect, adjust, or operate medical equipment unless the rider requests assistance and the employee is trained and authorized to provide it.
- Enforce all no-smoking and ignition-control rules. If a specific condition creates an immediate safety concern, contact dispatch or supervision and seek a safe accommodation rather than automatically refusing service.

6. Adequate Time for Vehicle Boarding

49 CFR 37.167(i)

Operators will provide individuals with disabilities adequate time to board, be secured, take a seat, and disembark. Schedules, dwell-time expectations, or perceived delay will never override safe boarding or disembarking.

Operator requirements

- Stop close enough to the curb or boarding area to provide accessible entry whenever conditions permit, and position the vehicle to permit safe lift or ramp deployment.
- Wait until the rider has boarded, the mobility device is properly secured when required, and the rider is seated or otherwise stable before moving the vehicle.
- Provide additional time when requested or when the need is apparent. Use clear communication and do not rush, shame, or physically move a rider without consent.
- At the destination, allow enough time for securement release, equipment positioning, lift or ramp use, and safe movement away from the vehicle before departing.

Operational standard: The vehicle will remain stopped until boarding or disembarking is complete and the operator has confirmed that movement can begin safely.

Operator Field Reminders

Situation	Immediate response
Feature fails	Report immediately, notify dispatch, document the defect, and arrange an accessible vehicle or alternative service as required.
Mobility device	Deploy the lift or ramp, assist as needed, use the securement system, and never require a transfer to a seat.
Service animal	Permit the animal with its handler; do not demand certification, identification, a carrier, or a pet fee.
Stop condition	Deploy at a designated stop unless a specific regulatory exception applies; contact dispatch and document any alternate stop.
Oxygen / respirator	Permit the equipment, position it safely, protect access and egress, and do not handle controls unless trained and requested.
Extra time	Keep the vehicle stopped until boarding, securement, seating, or disembarking is safely complete.

Implementation and Compliance Controls

Control	Provider commitment
Training	Initial and refresher training to proficiency for operators, dispatchers, supervisors, and maintenance staff; practical lift, ramp, and securement demonstrations are documented.
Pre-trip checks	Accessibility features are checked and results recorded before service, with immediate defect reporting and vehicle substitution when required.
Incident records	The Provider records equipment failures, denied or altered service, alternative transportation, rider complaints, investigation results, and corrective action.
Monitoring	Supervisors conduct periodic observations and record reviews. Noncompliance results in prompt coaching, retraining, discipline, or process correction as appropriate.
Policy review	This policy is reviewed at least annually and whenever CTDOT requirements, federal regulations, equipment, or operating practices change.