

Cornerstone Special Care ADA Transportation Policy

Purpose

Cornerstone Special Care provides transportation services for its residents and for employees acting within the scope of their employment while conducting authorized Cornerstone Special Care business.

It is the goal of Cornerstone Special Care to provide safe, efficient, effective, accessible, and nondiscriminatory transportation. Transportation supports residents' access to medical care, community activities, programs, services, and other opportunities. Employee transportation is provided only when employees are accompanying or supporting residents or performing other authorized work-related duties.

Cornerstone Special Care does not provide transportation for employee commuting and does not operate a fixed-route transportation service for the general public.

Policy

It is the policy of Cornerstone Special Care to comply with all applicable provisions of the Americans with Disabilities Act of 1990, as amended; Section 504 of the Rehabilitation Act of 1973; and applicable U.S. Department of Transportation regulations.

Cornerstone Special Care prohibits discrimination based on disability in the transportation services it provides to residents and employees who are accompanying or supporting residents or otherwise performing authorized work-related duties. Transportation services, vehicles, accessibility equipment, policies, and practices will be administered in a manner that provides individuals with disabilities equal access to transportation.

Wheelchair Definition

For purposes of this policy, a wheelchair is 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.

Cornerstone Special Care will transport a wheelchair and its user when the lift or ramp and the vehicle can accommodate the combined size and weight of the wheelchair and its user and transportation can be provided consistent with legitimate safety requirements.

Cornerstone Special Care may decline to transport a wheelchair and its user when the combined weight exceeds the specifications of the lift or ramp, the wheelchair and user cannot physically be accommodated within the vehicle, or transportation would be inconsistent with legitimate safety requirements.

Transportation of Persons with Disabilities

Cornerstone Special Care is committed to ensuring safe, efficient, effective, and accessible transportation for persons with disabilities. Cornerstone Special Care will comply with the following requirements:

- Vehicles used to transport individuals who use wheelchairs will be equipped with an accessible lift or ramp and an appropriate wheelchair securement system.
- Cornerstone Special Care requires individuals who use wheelchairs to permit their wheelchairs to be secured while the vehicle is in operation.
- Staff will use the vehicle's securement system to secure wheelchairs within the designated wheelchair securement area.
- Transportation will not be denied solely because a wheelchair cannot be secured or restrained to the satisfaction of the vehicle operator. Staff will make reasonable efforts to secure the wheelchair using the available securement system and will report any securement problem to Cornerstone Special Care administration.
- Cornerstone Special Care may recommend that a person using a wheelchair transfer to a vehicle seat but will not require the person to transfer.
- Cornerstone Special Care staff will provide assistance, when requested or necessary, with lifts, ramps, and wheelchair securement systems.
- Persons with disabilities who do not use wheelchairs, including individuals who cannot use vehicle steps, will be permitted to use vehicle lifts or ramps.
- Cornerstone Special Care will permit service animals that have been individually trained to perform work or tasks for persons with disabilities to accompany those individuals in vehicles and facilities. The service animal must remain under the control of its handler and must not present a direct threat to the health or safety of others.
- Vehicle operators and other responsible personnel will use all required accessibility-related equipment and features, including wheelchair securement systems, lifts, and ramps.
- Cornerstone Special Care will provide transportation to persons who use respirators or portable oxygen, consistent with applicable safety and hazardous-material requirements. Staff will ensure that portable equipment is appropriately secured during transportation.
- Cornerstone Special Care will provide persons with disabilities adequate time to board and exit a vehicle.
- Cornerstone Special Care will provide transportation information in an accessible format upon request.
- Cornerstone Special Care will train vehicle operators and other employees whose responsibilities involve transportation to proficiency regarding:
 - Safe vehicle operation;
 - Proper use of lifts, ramps, and securement systems;
 - Assistance for individuals with disabilities;
 - Applicable ADA transportation requirements; and
 - Respectful and courteous interaction with persons with disabilities.
- Vehicle operators will inspect lifts, ramps, interlocks, and wheelchair securement equipment as part of required pre-trip and post-trip inspections.
- Equipment failures will be reported immediately to Cornerstone Special Care administration.
- Accessibility equipment that is damaged, malfunctioning, or out of service will be repaired promptly. Cornerstone Special Care will take reasonable steps to accommodate an individual with a disability who would otherwise be unable to use the vehicle because of an equipment failure.

Reasonable Modification of Policies, Practices, and Procedures

Cornerstone Special Care is committed to providing equal access and opportunity to qualified individuals with disabilities in its transportation programs, services, and activities.

Cornerstone Special Care will make reasonable modifications to its transportation policies, practices, and procedures when necessary to avoid discrimination and enable individuals with disabilities to access its transportation services, unless the requested modification:

- Would fundamentally alter the nature of the service, program, or activity;
- Would create a direct threat to the health or safety of others; or
- Is not necessary for the individual to fully use the service for its intended purpose.

Individuals are not required to use the words “reasonable modification” when making a request.

For information about requesting a reasonable modification or appealing a denial, refer to the **Cornerstone Special Care Reasonable Modification Policy and Procedures**. Federal regulations require an accessible process for requesting modifications and identify the permissible reasons for denying a request.

Refusal of Service and Nondiscrimination

Cornerstone Special Care may refuse, interrupt, or modify transportation service when an individual:

- Engages in violent, seriously disruptive, or illegal conduct; or
- Represents a direct threat to the health or safety of others.

Any decision will be based on the individual’s actual conduct and the circumstances at the time, rather than assumptions or generalizations concerning the individual’s disability.

Cornerstone Special Care will not refuse transportation solely because an individual’s disability results in an appearance, communication method, or involuntary behavior that may offend, annoy, or inconvenience employees or other persons. This distinction is reflected in the federal nondiscrimination regulation.

ADA Equipment Maintenance Requirements

Cornerstone Special Care is responsible for maintaining accessible features on its vehicles, including lifts, ramps, wheelchair securement devices, interlocks, signage, and communication-related equipment.

Preventive maintenance will be completed in accordance with the equipment manufacturer’s recommendations and Cornerstone Special Care’s established maintenance schedule. Lift and ramp equipment will be inspected and serviced during each scheduled vehicle oil change and more frequently when required by the manufacturer’s maintenance schedule or indicated by inspection results.

Vehicle interlocks will be inspected during daily pre-trip and post-trip inspections and during scheduled vehicle inspections. A vehicle with a malfunctioning interlock or other accessibility-related equipment that affects safe operation will be removed from service until the condition is corrected.

Maintenance and repair records will be retained in accordance with Cornerstone Special Care's vehicle maintenance and record-retention procedures.

ADA Complaint Procedures

Cornerstone Special Care is committed to providing safe, efficient, and accessible transportation for persons with disabilities. Any complaint alleging disability discrimination in connection with a Cornerstone Special Care transportation program or service will be promptly reviewed and investigated. Every reasonable effort will be made to achieve an appropriate and timely resolution.

A complaint must be filed within 180 calendar days of the alleged discriminatory act or the date on which the complainant became aware of the alleged discrimination.

Complaints may be submitted using Cornerstone Special Care's ADA/Title VI Complaint Form. Assistance completing the form and alternative formats are available upon request. A person will not be denied the opportunity to file a complaint because they are unable to submit it without assistance.

Complaints may be submitted to:

Melissa Francque, Executive Director and ADA/Title VI Coordinator

Cornerstone Special Care

815 W. 23rd Street

Sterling, IL 61081

Telephone: (815) 626-5820, ext. 200

Email: info@cornerstonespecialcare.org

Complaints received by telephone or in person will be documented and provided to the complainant for confirmation. Complaints submitted electronically may require confirmation of the complainant's identity and intent to proceed.

Cornerstone Special Care prohibits intimidation or retaliation against any person because that person submitted a complaint, assisted with a complaint, participated in an investigation, or exercised a right protected by the ADA or Title VI.

Complaints will be processed in accordance with the separate **Cornerstone Special Care ADA/Title VI Complaint Procedures**, which are available on the Cornerstone Special Care website or by contacting the ADA/Title VI Coordinator.

Copies of this policy, the ADA/Title VI Complaint Procedures, the ADA/Title VI Complaint Form, and the Reasonable Modification Policy are available on the Cornerstone Special Care website or by contacting the ADA/Title VI Coordinator during regular administrative business hours, Monday through Friday, 9:00 a.m. to 5:00 p.m.