

ADA POLICY HANDBOOK



ComWell

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ComWell strives to provide safe and assessable curb to curb transportation services. Our transportation services are primarily limited to persons that attend the CDS Program, Community Support Day Program, and consumers within our residential sites. There may be times that ComWell will provide public transportation.

The scheduling of routes and designated pick up and drop off sites are coordinated between the program providers and the Facility Manager. The transportation of clients cannot exceed 1 hour from pick up to drop off.

WHEELCHAIR SERVICE

Section 37.3 of the DOT's regulations implementing the Americans with Disabilities Act of 1990 (ADA) (49 CFR Parts 27, 37, and 38) defines a "common wheelchair" as 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. A "common wheelchair" does not exceed 30 inches in width and 48 inches in length measured two inches above the ground, and does not weigh more than 600 pounds when occupied. ComWell is not able to transport a wheelchair that exceeds the limitation of the lift; therefore all requests for wheelchair transportation must be made in advance to ensure that accommodations can be met.

An electric scooter or other mobility device must be treated as a "common wheelchair" if it meets the physical specifications of a common wheelchair as defined by the DOT's ADA regulations. Electric Scooters must be secured while in transit or the individual must transfer to a regular bus seat for safety reasons.

PROCEDURES FOR WHEELCHAIR TRANSPORT:

For safety and liability reasons, ComWell adheres to the following guidelines:

1. Clients utilizing a wheelchair will be allowed to transfer to a regular seat in the vehicle, if the client requests to do so and is able to complete the transfer with minimal assistance from the driver.
2. ComWell reserves the right to refuse service to any client who will not allow their wheelchair to be secured utilizing the 4-and/or 6 point securement system within the COMWELL vehicle. COMWELL drivers have been trained to use a 4 and 6 point tie-down system for all wheelchairs to guarantee the safest securement possible.
3. ComWell reserves the right to refuse service to any passenger who has unsafe equipment. The driver will make the final determination of unsafe equipment.
4. Staff will provide assistance upon request or as necessary with lifts, ramps, and securing systems. A rider who is not in a wheelchair may use the lift (with the driver's assistance) if they are unable to enter or exit the vehicle by the use of the stairs.
5. Ramps and wheelchair paths must be properly paved and kept clear of snow, ice, parked cars, trash, and other obstructions. Drivers will be unable to perform requested curb to curb services should they determine that ramps or walkways are unsafe.

6. ComWell drivers will not help wheelchair users up and down steps.
7. ComWell drivers will assist clients in loading and unloading personal items, coolers, backpacks, purses etc.
8. ComWell will provide service to clients using respirators or portable oxygen, providing equipment will be secured while being transported within the vehicle.

SEATBELTS

For safety reasons ComWell's policy is that all clients are to be secured in a seatbelt whenever a seatbelt is available

SERVICE FOR DISABLED CLIENTS

ComWell is committed to meeting the needs of the disabled community. Our drivers undergo sensitivity and passenger relations training as well as training in evacuation, elderly and disabled passengers. Suggestions for improvements in our services for the disabled are always welcome. Please call or write the ComWell for suggestions or concerns.

Service animals are permitted to accompany/assist passengers with disabilities.

Passengers needing mobility aids must provide their own. ComWell complies with ADA by attempting to accommodate all wheelchair and mobility aids in common ComWell use including (Amigos, Rascals, and other scooter style devices). Because of the difficulty in providing an effective restraint system for users of scooters for mobility, if physically able, ComWell clients using any type three-wheeled scooter as their mobility aid will be asked to be seated in a conventional seat while the vehicle is in motion. This request is made so the client will have lap restraints available for use. *During the loading or unloading process of the electric mobility aide, the power supply switch shall be turned "OFF" while on the lift with the brakes "SET". After the electric mobility aide is spotted in the bus for transportation, the power supply switch is to be turned "OFF" during transportation.

Extra time is allowed for loading and unloading of vehicle for clients with disabilities.

Service to persons using Respirators or Portable Oxygen will not be denied, however another person that is trained in its use may be required to ride along to monitor its use.

If a client/passenger is in need of a Personal Care Assistant, they will be allowed to ride the bus to aid in any special needs that they may have.

Information on request for reasonable modifications can be found in Managerial Policy 1.1.6.1

SAFETY

ComWell's maintenance department oversees the maintenance of the agency fleet by routine maintenance, service and repairs. All repairs are performed by or supervised by a qualified technician. Routine maintenance is performed every 3,000 miles. If deficiencies are noted on a vehicle, which would make the vehicle unsafe to operate, vehicle may be pulled from service and will not be returned to service until it has been deemed safe by a qualified technician. In the event any vehicle has been pulled from service due to a failed inspection, or driver complaint, the vehicle cannot be returned to service until the next driver of said vehicle has signed and dated a copy of the repair order for said repairs. In

some instances, alternative accessible transportation will be provided if the accessibility equipment is not present or inoperable.

ComWell drivers are properly trained and licensed in accordance with State and Federal laws. ComWell drivers receive initial and annual training in safety including emergency procedures, seat belt and wheelchair tie-down procedures, evacuation procedures and other areas.

ComWell drivers inspect their vehicles (including lift and ramp equipment) on a daily basis through the use of a Pre-Trip and Post-Trip Inspection. A qualified technician immediately addresses any problems noted. If a problem with lift equipment is noted, the vehicle will be immediately removed from service until the problem is corrected. A spare vehicle will be used for service on that route.

Every ComWell driver is trained and understands the manual operation of the lift or ramp so, in the event that the need arises, the driver will be able to accommodate passengers. If a lift or ramp cannot be manually operated in order to accommodate a passenger, dispatch is contacted and arrangements are made with maintenance personnel to send a replacement vehicle and the defective vehicle is removed from service until repaired.

LIFT AND SECUREMENTS

All ComWell drivers are properly trained to use wheelchair lifts, ramps and corresponding securement equipment. Following is a brief description of operator instructions:

USING THE LIFT

Recommended techniques:

- ComWell recommends backing the wheelchair onto the lift; however, the American Disabilities Act (ADA) allows the passenger to make the choice.
- Set the brakes on the wheelchair. ALWAYS ask the client to turn off the power to a motorized chair.
- Place one hand on the wheelchair and the other hand on the control panel, and inform the W/C client that you are going to start the lift.
- After reaching floor level, push the wheelchair into the vehicle, set brakes, and then proceed inside the vehicle to bring the client completely inside.
- Drivers WILL NOT ride the lift with wheelchair clients. Riding the lift with standees is permissible and the driver must determine the passenger's capability to safely ride the lift . Passenger must have both hands on safety rails.
- Use proper securement procedures for every wheelchair. The 4 point floor securement must be used on every wheelchair client to anchor the wheelchair to the floor.

LIFT OPERATIONS

- Vehicle should be running
- Transmission should be in "PARK"
- Emergency brake set
- Lift power switch turned on. At this point the "Lift Ready" green light should activate
- If the lift ready light is on, you may open the lift doors and the lift should be fully operational
- In the event the lift does not operate, close lift doors and repeat the steps listed above

- If lights are activated and lift does not work, push “UP” button on lift controls to see if lift has settled while sitting or driving (bleed off).

MANUAL OVERRIDE OF LIFT OPERATION

Drivers have been trained in the manual operation of all other lifts.

- Manual back-up pump
- To lower platform and unfold, place slotted end of pump handle into back-up pump release valve and turn counterclockwise (open ½ turn only). When platform reaches desired height and roll stop unfolds turn release valve clockwise to stop. Valve should be tight but DO NOT over tighten.
- To fold roll stop and raise platform, place the slotted end of the pump handle into the back-up release valve and turn clockwise to close securely. DO NOT over tighten. With pump handle in back up pump, move pump handle in up and down motion, (pumping) until the desired height to the platform is reached.

RAMP OPERATIONS

Some of ComWell’s vehicles are equipped with wheelchair ramps. Ramps that are deployed at the sidewalk level may be boarded by the passenger either forward or backwards, depending on their preference. The ComWell driver will offer assistance and will remain nearby to ensure that the wheels of the wheelchair do not go over the lip of the ramp. If the ramp is deployed at street level with no sidewalk and the ramp is at an incline, the ComWell driver will maintain full control of the passenger and wheelchair. The wheelchair will be pushed up and backed down the ramp. This will ensure that the passenger does not tip or fall out of the wheelchair while moving up or down the ramp.

WHEELCHAIR SECUREMENT TECHNIQUES

It is the policy of ComWell that all wheelchairs will be secured by the 4-point floor system to anchor the wheelchair to the floor. It is mandatory that all passengers are secured with lap belts. ComWell seat policy states that lap and shoulder belts be utilized. This company policy is within compliance guidelines of the ADA.

- Install straps track fittings approximately 3 inches outside the front wheels
- Place straps around W/C frame, pull tie-down straps until snug
- Place rear strap track fitting just inside rear wheels directly to rear of chair, attach straps to rear frame and tighten
- The strap “keeper” must always face away from W/C both front and rear
- Tighten rear straps so that W/C has no movement. DO NOT over tighten, damage to the W/C could result
- All tie-down straps should be placed so they are at a 45 degree angle if possible. All straps should be placed around frame of W/C

- Always secure the lap belt and shoulder harness to the tie-down system, never to the wheelchair