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Americans with Disabilities Act Training Program for Motorcoach Companies

SELF-STUDY GUIDE

Americans with Disabilities Act Training Program for Motorcoach Companies Self-Study Guide

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Since 1926 and as the industry leader the American Bus Association (ABA) advances North American motorcoach travel to fulfill the transportation and travel needs of the public. ABA represents approximately 1,000 motorcoach and tour companies in the United States and Canada. Its members operate charter, tour, regular route, airport express, special operations and contract services (commuter, school, transit). Another 2,800 member organizations represent the travel and tourism industry and suppliers of bus products and services who work in partnership with the North American motorcoach industry. ABA is also home to ABA Foundation, a nonprofit organization with an emphasis on scholarships, research, and continuing education.

American Bus Association • 111 K Street NE 9th Floor • Washington, D.C. 20002
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Incorporated in 1933, the National Bus Traffic Association (NBTA) has served as the single processing agent for interline thru-tickets for scheduled service motorcoach operators in the private intercity bus industry. This clearinghouse allows for fast and efficient money transfers between participating carriers, eliminating many of the hassles typical of working with disparate companies located in varying states, time zones and locales and also offers a forum for intercity operators to discuss common operating and policy issues. In 2011, nearly \$179,000,000 was transacted in payables and receivables through the IRCH.

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Foreword

Dear Motorcoach Operators,

No matter what kind of over-the-road bus services you provide on a daily basis, it is our goal as an industry to meet the transportation and travel needs of the public and to leave no passenger unsatisfied or left behind.

This guide presents an informal overview of some basic Americans with Disabilities Act (ADA) requirements and provides a training resource using real-world “what would you do if” examples. This document has been created by small businesses for small businesses, and includes the generous input of operators across a variety of motorcoach service types and fleet sizes and was also developed in concert with our partners at several federal agencies.

You will find that this guide leaves out many of the legal terms that are often found in discussions of the ADA and its regulations, but instead attempts to provide you, in plain language, with the information and training that will help you be better prepared to fulfill the ADA requirements. Because it would be misleading to separate any explanation of the ADA requirements from the law, however, references to key sections of the regulations or other information are also included.

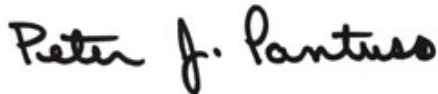
Just as we know that the unexpected may happen to you out on the roadway, we want to be sure that you are not caught off-guard or unprepared for ADA service-related practices so that your customers and you can have the pleasant travel experience that all passengers expect and deserve. While passengers with disabilities are often the most prepared when it comes to planning a trip, our motorcoach operators need to step up and continue to provide first-class transportation services. Preparing to provide peerless customer service throughout all levels of your organization is just one element of providing a first-class travel environment in addition to preparing your vehicle’s accessible equipment. Hopefully this guide presents you with an opportunity to emphasize that point to your staff.

It is the goal of the American Bus Association, Easter Seals Project ACTION, and our other industry partners to continue to find and develop training and customer service resources to best position the industry for success, as well as afford you an environment in which to grow your business. If you need any help getting through this or any other resources developed to help you navigate the ADA or other regulations, please don’t hesitate to reach out to us. We are more than happy to help and get you pointed in the right direction.

Motorcoaches are THE travel solution for more than 630 million passengers each year and provide essential transportation services on a daily basis. Let’s ensure that we all continue to put our best foot forward in providing the highest level of customer service and equipment accommodations possible, guaranteeing unforgettable, positive travel memories in addition to providing a safe trip every time.

Thank you for taking the time to read and use this training guide!

Sincerely,

A handwritten signature in black ink that reads "Peter J. Pantuso". The signature is written in a cursive, slightly slanted style.

Peter J. Pantuso, CTIS
President & CEO
American Bus Association

SECTION 1

Introduction to the Self-Study Guide

Welcome, and thank you for your commitment to accessible transportation and good service for all customers. This Self-Study Guide is one part of a package of resources developed in partnership by Easter Seals Project ACTION and the American Bus Association. Other components of the resource package include:

- Facts About Service Animals and Transportation Bookmark
- Motorcoach Operator's ADA Pocket Guide
- Safety & Securement Equipment Operation for Passengers with Disabilities DVD

Designed for use by motorcoach drivers and other employees who may have contact with passengers who have disabilities, this self-study guide and all the Motorcoach ADA training resources address the ADA rules for accessible motorcoach service, good customer service delivery, and how to assist passengers who have disabilities.

The ADA requires that:

- Transportation agencies provide accessible vehicles, trained personnel and information in an accessible format that the customer can use.
- An individual with a disability must be able to board and ride a public bus, train, car or van.
- Lifts, ramps, and securement devices must be operational and capable of handling all common mobility devices as required by the ADA and company policy.

ADA regulations require that all employees of a transportation company who are involved in service delivery to people with disabilities be trained to proficiency so that they properly operate and maintain accessibility equipment, such as lifts and the securement system on buses, and provide service in a courteous and respectful manner with attention to the differences among individuals. The ADA prohibits discriminatory actions toward people with disabilities. Motorcoach companies must ensure that employees are trained in both the technical skills required of their position and appropriate customer service delivery.

How to Use the Self-Study Guide

The self-study guide, along with the other motorcoach training materials mentioned above, can be used for self-directed study or as part of a motorcoach company group training session.

Questions and answers are included in several sections, which can be used to help test understanding of the material. The guide concludes with a glossary and resources.

Americans with Disabilities Act (ADA) Overview

The Americans with Disabilities Act was signed into law by George H.W. Bush on July 26, 1990. When the ADA was enacted, there were approximately 43 million Americans with disabilities. Recent U.S. Census figures indicate that the number has grown to approximately 55 million people.¹

The ADA protects the civil rights of individuals with disabilities and guarantees everyone the same opportunities to participate in community life.

The ADA covers:

- Title I - Employment
- Title II - State and Local Governments
- Title III - Public Accommodations
- Title IV - Telecommunications
- Title V - Miscellaneous/Enforcement Mechanisms

Title I prohibits discrimination on the basis of disability in regard to job application procedures, hiring, advancement or discharge of employees, employee compensation, job training, and other terms, conditions, and privileges of employment. Companies with more than 15 employees must comply with ADA Title I provisions.

Key requirements of Title I that prevent discrimination on the basis of disability in employment:

- A transportation employer may require that employees comply with standards established in U.S. DOT regulations.
- Title I requirements do not encourage, prohibit, restrict, or authorize the lawful exercise of transportation employers to test employees for illegal drug use or on-duty alcohol impairment nor to remove employees in safety-sensitive duties who test positive for illegal drug use or on-duty alcohol impairment.
- The ADA does not stipulate requirements related to drug use or alcohol impairment or testing; however, the U.S. DOT regulations do address these issues. See U.S. DOT Safety and Security regulations in 49 CFR Part 40. Federal Motor Carrier Safety Administration regulations pertaining to controlled substances, and alcohol use and testing are found in 49 CFR Part 382. Federal Transit Administration-specific regulations on Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations are found in 49 CFR Part 655.

Title III prohibits discrimination on the basis of disability in public accommodations and services provided by private businesses. Title III covers public transportation provided by private motorcoach companies and transportation for hire, and entities not primarily engaged in transportation, such as hotels and restaurants that provide customer courtesy transportation services.

Key requirements of Title III that prevent discrimination on the basis of disability in services and accommodations:

- Individuals with disabilities shall not be discriminated against on the basis of disability in the services, facilities, privileges, advantages, or accommodations of any place of public accommodation. Eligibility criteria that exclude those with disabilities may not be used.
- People with disabilities shall receive goods, services, and accommodations in the most integrated setting appropriate.
- Reasonable modifications shall be made to policies, practices, and procedures to provide services to people with disabilities.
- Architectural and structural communication barriers in existing facilities shall be removed where possible. Such existing structures may include but are not limited to telephones, drinking fountains, and paper towel dispensers mounted at a height inaccessible to people using wheelchairs, deep pile carpeting or unpaved ground surfaces. Examples of structural

communication barriers include signage that is inaccessible to people with visual impairments or audible alarm systems that are inaccessible to people with auditory impairments.

ADA transportation regulations for Title III entities are incorporated into 49 CFR Part 37 and 49 CFR Part 38, including specific requirements for vehicles and facilities, new acquisitions, and alterations. There are specific provisions for motorcoach operators, taxi operators, airport shuttles, and vanpools.

How does the ADA affect the Transportation Industry?

The ADA law requires that public and private transportation agencies and companies make their employment opportunities, services and facilities accessible to individuals with disabilities, including people who use wheelchairs. **The ADA makes it clear that denying individuals with disabilities access to transportation is discrimination and it is against the law.**

All of the following ADA requirements affect your motorcoach company:

Employment

Companies with more than 15 employees must comply with the ADA Title I employment provisions. The key requirement of Title I is that an employer may not discriminate on the basis of disability in regard to job application procedures, hiring, advancement or discharge of employees, employee compensation, job training, and other terms, conditions, and privileges of employment. All companies, however, must comply with ADA Title III provisions for service delivery. In addition, a company that employs a person with a disability, if that person requires the acquisition of a commercial driver's license as a condition of their employment, in addition to the CDL, must secure a skill performance evaluation (SPE) or a waiver. That document would need to be carried with the certified driver at all times, in addition to their medical card, in order for their CDL to be valid. For more information on the SPE and waiver process, visit 49 CFR 391.41. By March of 2015, medical cards should be integrated into the CDL and may no longer need to be carried.

Facilities

Companies must make their buildings and facilities (ramps, doorways, restrooms, counters, vending machines, telephones, etc.) accessible to individuals with disabilities, including people who use wheelchairs, and must remove obstacles in paths of travel.

Communication and Information

Companies must make information about their services accessible to individuals with disabilities, including people who are blind or have a visual impairment or who are deaf or hard of hearing. Access may include the use of aids and services, such as qualified interpreters, information in braille, large-print materials, audio-taped recordings, and specialized technology. Individuals with cognitive disabilities may have difficulty reading signs or speaking clearly. Accommodations for passengers with cognitive disabilities may include providing written information at a basic reading level, using universal symbols on signs and in vehicles, and incorporating training on patient, effective verbal communication.

Transportation Services

Companies must make their transportation services accessible to and useable by individuals with disabilities, including people who use wheelchairs. This includes vehicles, programs, activities and facilities.

Protections for People who have Disabilities

- An individual shall not be denied use of a transportation service provided to the general public if the individual is capable of using that service.
- An entity must not refuse to serve an individual with disabilities solely because the individual's disability results in appearance or involuntary behavior that may offend, annoy, or inconvenience employees or others.
- Special charges (other than those authorized by U.S. DOT ADA regulations) may not be imposed on individuals with disabilities—including individuals using wheelchairs—for providing transportation services. An individual with a disability, including people using wheelchairs, shall not be charged a fee higher than the posted or applicable rate for transportation services.
- An individual with a disability shall not be required to be accompanied by an attendant nor be required to use designated priority seats if the individual chooses not to do so.
- An individual shall not be denied transportation service because a provider's insurance conditions, coverage, or rates are based on the absence of individuals with disabilities.¹

ADA Regulations for Motorcoach Companies – U.S. Department of Transportation Requirements

United States Department of Transportation requirements that pertain to motorcoach service for passengers with disabilities are found in 49 CFR Part 37 with disabilities and vehicle specification requirements are found in 49 CFR Part 38. Operators should remember that following the passage of the Over-the-Road Bus Transportation Accessibility Act of 2007 (PL 110-291), fleet and service compliance with the ADA will be considered as part of the registration and granting of authority process and will be reviewed as part of the periodic compliance review process as conducted by the Federal Motor Carrier Safety Administration. In situations where a company does not possess accessible vehicles, they must also demonstrate that they have an established relationship or sub-contracting plan in place with another operator to secure an accessible vehicle when requested. Basic service requirements are summarized as follows:

Accessible Fleets

Large fleet fixed-route over-the-road bus (OTRB) operators must ensure that all of their fleets consist of accessible buses by October 2012. All new, used and remanufactured OTRB acquisitions by large operators must also be lift-equipped. [49 CFR 38.15] This applies to purchased and leased vehicles. Also, based on a policy memo from DOT dated August 8, 2012, all extra sections run by large fleet OTRB operators, whether using fleet equipment or contracted and sub-leased equipment from other OTRB operators must also be 100% lift equipped. [49 CFR 37.185]

Large operators are defined by U.S. DOT for the purposes of the ADA as having annual revenue for the fixed-route portion of its fleet that exceeds a threshold that adjusts annually based on the consumer price index (CPI). [49 CFR § 37.183, 185]

A large fleet demand-response/charter-tour OTRB operator must provide service in an accessible bus to passengers with disabilities on a 48-hour advance notice basis. [49 CFR § 37.189]

Mixed-service OTRB operators must meet the requirements under the rule for both fixed-route and demand-responsive segments of their service.

In the case of remanufacturing a bus or purchasing or leasing a remanufactured bus to extend a vehicle's life for five years or more, the remanufactured bus shall, to the maximum extent feasible, be readily accessible by people with disabilities, including passengers who use wheelchairs, unless an

engineering analysis demonstrated that including accessibility features would have a significant adverse effect on the structural integrity of the vehicle. [49 CFR § 37.197]

Small fleet fixed route OTRB operators do not have a deadline as to when all or part of the fleet must be accessible, but until their entire fleet is accessible, any newly acquired bus must be accessible or they must provide equivalent service to individuals with disabilities who use wheelchairs. Small fleet fixed-route companies do have the flexibility to use an alternative vehicle in order to accommodate a passenger with a disability, provided they are given 48 hours' notice of a need for accommodations. Small fleet demand-response (or charter) operators do not need to acquire accessible vehicles with their new vehicle acquisitions, but must provide accessible service if given 48 hours' notice. Small mixed-fleet operators who provide both fixed route and demand response service, will meet the accessibility requirements by providing accessible service given 48 hours' notice, but have no deadline or requirement to acquire accessible vehicles with new purchases.

Complaints

If accessible service is not provided in accordance with the ADA, the customer has a right to file a complaint with the U.S Department of Justice or with the Federal Motor Carrier Safety Administration. Information about the complaint process is available at the U.S. Department of Justice website www.usdoj.gov. For complaints submitted to the FMCSA, customers can utilize the "SaferBus" smart phone application or visit the FMCSA's National Consumer Complaint Database at www.nccdb.fmcsa.dot.gov.

Intermediate Stops and Rest Stops (49 CFR 37.201)

When a motorcoach [OTRB] makes an intermediate or rest stop, a passenger with a disability must be permitted to leave and return to the bus on the same basis as other passengers. The coach operator must ensure that assistance is provided to passengers with disabilities as needed to enable the passenger to get on and off the bus at the stop. An announcement must also be made when an unscheduled intermediate stop or rest stop occurs.

If a bus with an inaccessible restroom is used on a limited stop or an express run of three hours or more without a rest stop, and a passenger with a disability who is unable to use the inaccessible restroom requests an unscheduled stop, the operator shall make a good faith effort to accommodate the request. If the operator does not make the stop, the operator must explain to the passenger making the request the reason for its decision not to do so.

Additional Passengers Who Use Wheelchairs (49 CFR 37.205)

If the number of wheelchair users seeking to travel on a bus exceeds the number of securement locations on the bus, the operator must assign the securement locations on a first-come, first-served basis. The operator must offer boarding assistance and the opportunity to sit in a vehicle seat to passengers who are not assigned a securement location. If passengers who are not assigned securement locations are unable or unwilling to accept this offer, the motorcoach operator is not required to provide transportation to them on the bus. Operators may ask, but are not required to make existing passengers move from a seating position in order to make an accommodation for a passenger with a disability.

Discriminatory Practices (49 CFR 37.207)

The following are considered discrimination for any motorcoach operator:

- A. Denying transportation to passengers with disabilities, except as provided in 49 CFR section 37.5 (h).
- B. Using or requesting the use of persons other than the motorcoach company's employees (e.g., family members, traveling companions of a passenger with a disability, medical or public safety personnel) for routine boarding or other assistance to passengers with disabilities, unless the passenger requests or consents to assistance from such persons
- C. Requiring or requesting a passenger with a disability to reschedule his or her trip, or travel at a time other than the time the passenger has requested, in order to receive transportation; or
- D. Failing to provide reservation services to passengers with disabilities equivalent to those provided other passengers.

Individual Requests for Accessible/Equivalent Service

In accordance with 49 CFR Part 37.213, Information Collection Requirements, all requests for accessible motorcoach service (or equivalent service) must be documented by OTRB companies according to U.S. DOT regulations. The motorcoach company must transmit a copy of the documentation form to the passenger no later than the end of the next business day following receipt of the request. Companies that provide interlining bus service offer passengers with disabilities the ability to make a single request for accessible service that covers all segments of the requested trip; however, fixed route bus companies that do not have interlining agreements in place with connecting carriers may not be able to guarantee accessible transportation for all trip segments. Companies that are members of the National Bus Traffic Association have interlining agreements that cover transportation

Additional Requirements of Part 37 and Part 38

■ Part 37

Lift Maintenance

A motorcoach company shall establish a system of regular and frequent maintenance checks of lifts sufficient to determine if they are operative. Operators shall report to the company, by the most immediate means available any failure of a lift to operate in service. If a lift is found inoperative, the company shall take the vehicle out of service before the beginning of the vehicle's next trip and ensure that the lift is repaired before the vehicle returns to service. If there is no other vehicle available to take the place of the coach with an inoperable lift, such that taking the vehicle out of service will reduce the transportation service the company will be able to provide, the company may keep the vehicle in service with an inoperable lift for no more than five days from the day the lift was discovered to be inoperable.

Training

Motorcoach operators must comply with U.S. DOT requirements for training under 49 CFR Part 37.173. "Training to proficiency" is deemed to include, as appropriate to the duties of particular employees, training in proper operation and maintenance of accessibility features and equipment, boarding assistance, securement of mobility aids, sensitive and appropriate interaction with passengers who have disabilities, handling and storage of mobility devices, and familiarity with U.S. DOT regulations regarding accessible motorcoach service. Operating companies shall provide refresher training as needed to maintain employee proficiency.

▪ Part 38

49 CFR Part 38 Subpart G addresses ADA specifications for over-the-road buses and systems. The following topics are covered in the regulations:

- Floor surfaces, doors, and steps
- Handrails, vertical stanchions, and interior circulation
- Lighting on stairwells or doorways
- Lifts and ramps
- Moveable aisle armrests

Service Animals

U.S. DOT regulations stipulate that motorcoach companies shall permit service animals to accompany individuals with disabilities in vehicles and facilities.

Definition of service animal

The U.S. Department of Justice and U.S. Department of Transportation both define service animal and the type of functions the animals perform. **Motorcoach operators are required to follow U.S. DOT definitions and functions, not U.S. DOJ's.**

U.S. Department of Transportation (DOT) Definition

The U.S. DOT 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. An operator may ask if an animal is a service animal or ask what tasks the animal has been trained to perform but cannot require special ID cards for the animal or ask about the passenger's disability. A service animal may not be excluded unless the animal is out of control, and the animal's owner does not take effective action to control the animal or if the animal poses a specific threat to the health or safety of others. If an animal's only function is to provide emotional support or comfort for the passenger, that animal would not fall under the regulatory training-based definition of a service animal. Whether such animals are allowed is dependent on each company's policy. Check with your operating policies to determine whether your company accommodates such animals.

U.S. Department of Justice (DOJ) Definition

Service animal is defined as a **dog** that has been individually trained to do work or perform tasks for the benefit of an individual with a disability. Dogs not trained to perform tasks that mitigate the effects of a disability, including dogs used purely for emotional support, are not service animals under the U.S. DOJ definition. Individuals with mental disabilities who use service animals trained to perform a specific task are protected by the ADA. The U.S. DOJ rule permits the use of trained miniature horses as alternative to dogs, subject to certain limitations. To allow flexibility in situations where using a horse would not be appropriate, the U.S. DOJ rule does not include miniature horses in the definition of service animals.

Under the ADA, state and local governments, businesses, and nonprofit organizations that serve the public generally must allow service animals to accompany people with disabilities in all areas of the facility where the public is normally allowed to go. It may be appropriate to exclude a service animal from facilities or areas where the animal's presence may compromise a sterile environment (e.g., hospital operating room).

Section 1: Review and Discussion Questions 1 - 7

Read the following situations. Explain why these are examples of discrimination.

1. A woman who is deaf cannot hear the announcement that is being made. She asks a motorcoach company employee to write the information being announced on a piece of paper. The employee tells the woman that he is too busy right now and to ask someone else.
2. A passenger who has difficulty walking tells the motorcoach operator that she would like to use the lift because she cannot climb steps. The operator refuses and explains that the lift is only for passengers who use wheelchairs.
3. A passenger who uses a monkey as a service animal is refused boarding. The operator explains that he is sorry, but the other passengers are afraid of the monkey. He feels he cannot sacrifice the well-being and safety of the other passengers to accommodate one person.
4. A passenger who is blind boards the coach with a service dog. An older man jumps out of his seat and yells, "You cannot get on board this bus with that dog. I hate dogs and am not riding with one!" The operator tells the passenger with the guide dog to wait for the next coach going to her destination.

Read each sentence below. Circle the letter of the best answer.

5. The ADA prohibits discrimination based on:
 - A. Disability and age
 - B. Disability
 - C. Age, race and disability
 - D. Age and race
6. The ADA protects the rights of people with disabilities that:
 - A. Affect a person's mobility
 - B. Are visible
 - C. Are physical impairments
 - D. Are physical, mental and/or sensory impairments
7. The ADA guarantees individuals with disabilities access to:
 - A. Special transportation services
 - B. The same transportation services that are available to the general public
 - C. Some of the same transportation services that are available to the general public
 - D. Accessible motorcoach service only

Section 1: Answers and Explanations for Questions 1 - 7

1. In this situation, the employee has a responsibility to provide information to a customer with a disability in a format she can use. Refusing to provide information that is available to the general public to a customer with a disability is discrimination.
2. In this situation, the operator has the responsibility to make sure that customers with disabilities can access accessibility equipment, such as the motorcoach lift. Refusing to deploy the lift prevents the

customer from using the transportation service and denies her a ride. Denying transportation to a person with a disability is discrimination.

3. In this situation, the operator denies transportation to a customer with a disability traveling with a service animal, which is discrimination. Allergies and fear of animals are not valid reasons for denying a ride to a customer using a service animal.

Assisting customers traveling with service animals will be discussed in more detail in Section 3. In addition, the U.S. Department of Justice has issued an ADA Business Brief on Service Animals. Visit <http://www.usdoj.gov/crt/ada/svcabrs3.pdf> to download this resource.

4. In this situation, the operator is denying transportation to a customer with a service animal and then tells her to reschedule her trip to receive transportation. Both are actions of discrimination.
 5. The ADA prohibits discrimination based on:
B is correct: The ADA prohibits discrimination on the basis of disability.
 6. The ADA covers disabilities that:
D is correct: The ADA protects the rights of people with disabilities that are physical, mental and/or sensory impairments.
 7. The ADA guarantees individuals with disabilities access to:
B is correct: The ADA guarantees individuals with disabilities access to the same transportation services that are available to the public.
-

SECTION 2

Complying with Motorcoach ADA Rules and Service Reporting Requirements

Your motorcoach company should comply with the ADA rules because it is the law, it is good customer service, it is good business, and it is the right thing to do.

ADA Compliance is the Law

Discrimination is illegal. The ADA is a civil rights law. Denying a person with a disability accessible motorcoach service is discrimination.

Discrimination is:

- Inappropriate behavior toward your passengers.
- Embarrassing to the customer, you, and your company.
- Against the law.

ADA Compliance is Good Business

According to the U.S. Census, as of November 2014 America has 316 million citizens.² According to 2008 U.S. Census Bureau American Community Survey statistics, 36 million people with disabilities in the U.S. live in non-institutionalized environments and are seeking travel and transportation options that support independent living.³

Americans are living longer. In 2010, over 40 million people in the U.S. were age 65 years and older, making up 13 percent of the population.⁴ The U.S. Census Bureau projects that over 20 percent of the country's population will be over age 65 by the year 2050.⁵

With the population aging and the likelihood of having a disability increasing with age, the growth in the number of people with disabilities can be expected to accelerate in the coming decades.

According to the National Organization on Disability (N.O.D), the disability market is worth \$220 billion in collective spending power, and the potential is even greater when the extended market of families, friends, community agencies, employers, and service providers is considered.⁶ As a motorcoach industry professional, you know that all customers, including those with disabilities, their families, and associates respond positively to your company and your partners in the travel and tourism industry who pay attention to their interests and meet their needs.

ADA Reporting Requirements for Motorcoach Companies

The U.S. DOT requires accessible and timely motorcoach service for passengers with disabilities. As part of this service, motorcoach companies have ADA reporting requirements to submit to the U.S. DOT Federal Motor Carrier Safety Administration. Small and large companies have different reporting requirements. ADA Title II and III should be referenced for specific requirements. Basic reporting requirements include:

- Annual summary report of individual accessible/equivalent service requests and response/service provided
- Fixed-route motorcoach companies must submit an annual report that summarizes the number of passengers with disabilities who used the lift to board accessible buses in a 12-month period.
- Annual report of buses purchased/leased and overall fleet data
- All individual accessible/equivalent service requests

FMCSA details on reporting requirements and report submissions are available at www.fmcsa.dot.gov/safety/passenger-safety/ada-guidelines-over-road-bus-companies.

Section 2: Review and Discussion Questions 1 - 2

1. Name two organizations having large memberships of individuals with disabilities who could become your regular passengers.

A.

B.

2. State three reasons why you should comply with the ADA.

A.

B.

C.

Section 2: Answers & Explanations of Questions 1 - 2

1. There are many disability organizations with national, regional and local members who could become your customers. Some examples:

American Council of the Blind (www.acb.org)
Easter Seals, Inc. (www.easterseals.com)
National Association of Area Agencies on Aging (www.n4a.org)
National Association of the Deaf (www.nad.org)
National Council on Independent Living (www.ncil.org)
Open Doors Organization (www.opendoorsnfp.org)
Paralyzed Veterans of America (www.pva.org)
The Arc of the United States (www.thearc.org)
State Emergency Evacuation Contracts
Wounded Warrior Project (www.woundedwarriorproject.org)

You can also learn more about people with disabilities, including organizations in your community, in the following ways:

- Search for disability organizations in your city, state, or region on the Internet.
- Look under “Associations” in the Yellow Pages of your phone book.
- Contact your local United Way or similar fund-raising support network for a list of the organizations they serve.
- Contact the special education departments of schools, colleges, and universities.
- Look and listen for public service advertising on television and radio stations.
- Read the newspaper. People with disabilities make the news as leaders, achievers, advocates and shapers of public opinion.

2. Three reasons to comply with the ADA are:

- A. ADA compliance is the law.
- B. ADA compliance is good customer service.
- C. ADA compliance is good business.

SECTION 3

Good Customer Service Delivery to Customers with Disabilities & Communicating and Assisting Customers with Disabilities

Good service is important to all customers, including passengers with disabilities. The way you treat your customers is important. It determines whether customers feel they are receiving good service and contributes to their decision whether or not to use your services again.

ABA Code of Ethics: Good Customer Service

The American Bus Association's Code of Ethics has been adopted by its members to promote and maintain the highest standards of intercity bus service and personal conduct among its members.

We, the members of the American Bus Association, in carrying out our role of providing service to the traveling public, recognize the need to do so in a professional manner and to deal with the public and our colleagues with the highest degree of integrity.

The ADA and Good Customer Service

The ADA requires the delivery of good customer service to individuals with disabilities. Each motorcoach company shall ensure that:

...personnel are trained to proficiency, as appropriate to their duties, so that they operate vehicles and equipment safely and properly assist and treat individuals with disabilities who use the service in a courteous and respectful way, with appropriate attention to the difference among individuals with disabilities (49 CFR 37.173).

Providing Good Customer Service to Your Customers with Disabilities

Remember to follow these guidelines when serving customers with disabilities.

1. Treat customers with disabilities with courtesy and respect.
2. Use person-first language (e.g. person who uses a wheelchair instead of a wheelchair user). Even better, drop the label when it is not necessary to mention the disability; passengers with disabilities are “customers” just like everybody else and will be pleased to be recognized as such.
3. Give customers with disabilities the same information and choices that you give other customers. Include accessibility information in your customer materials.
4. Include accessibility information in your customer materials.
5. Never make assumptions about your customer's abilities.
6. Ask customers if they need assistance. If they say yes, ask them how you may assist.
7. Do not touch customers or their mobility devices without their permission.
8. Speak directly to customers, not their companions. Speak clearly with a normal tone and speed, unless the customer requests otherwise.

9. If you are asked to repeat or write what you said, do so calmly and pleasantly. If you don't understand what the passenger is saying, just ask them to repeat—again, calmly and pleasantly.

Serving Customers who are Deaf or Hard of Hearing

1. Face customers when speaking to them, and don't let objects obstruct their view.
2. Do not raise your voice—doing so distorts your lip movement and makes lip reading difficult.
3. Be sure to notify the customer of schedule changes or audible announcements.

Serving Customers who are Blind or who have a Visual Impairment

1. Identify yourself and ask how you may assist the passenger.
2. Respond verbally when the customer gives you information, so that she will know that you have heard her.
3. Remember to announce the customer's stop.
4. If handling a monetary transaction, count the customer's change out loud.

Serving Customers who use Wheelchairs

1. Ask customers how you can assist them.
2. Wheelchairs, walkers, canes, and other mobility devices are part of the customer's personal space. Do not hold or lean on them without the customer's permission.
3. Customers should be allowed to travel with their mobility aids if they wish to do so.
4. If a wheelchair must be stored in the baggage compartment, the driver or another motorcoach employee must assist with storing or retrieving it.
5. If you need to operate or store mobility aids, make no assumptions; ask the customer how best to do so.
6. Make sure you are aware of your company's policy regarding wheelchair securement. If a passenger wishes his wheelchair be secured, the operator must provide assistance.

Serving Customers who use Service Animals

1. Service animals are individually trained and allowed by law to ride in passenger compartments of motorcoaches.
2. Dogs are the most common service animals, but other animals may help people with disabilities.
3. Some service animals wear identification like a tag, vest or special harness. If you are not sure that the animal is a service animal, you may ask if it is a pet or a service animal. You may ask what type of tasks the service animal performs.
4. Certification or identification is not required for the animal, and service may not be refused because there is no such identification.

5. The service animal must stay with the owner and be kept under control at all times.
6. Never touch or talk to the service animal—it is working! Do not take responsibility for the service animal except in emergencies.

Service Animals and Cross-Border Travel

A service animal, trained to accompany a person with a disability, is permitted to travel across international boundaries on a motorcoach trip. Operators should be aware of U.S. Customs and Border Protection requirements as well as Canada and Mexico certification requirements. Owners are advised to carry proof of rabies vaccination in the form of a paper certificate. A dog collar tag is not sufficient proof of vaccination on its own.

Agencies in the U.S., Canada and Mexico that provide information on border regulations pertaining to service animals include:

- **Canadian Food Inspection Agency** (importing domestic dogs, terrestrial animal and veterinary health certificates) www.inspection.gc.ca

Travelers (including children) are required to have a passport to enter Canada from the United States. If flying to Canada, a regular passport is needed. If driving, either a regular passport or a passport card is allowed.

For pets entering Canada who are traveling with their owners: Dogs must be accompanied by proof of a rabies shot that has not expired. Dogs under three months of age do not require a rabies vaccine.

For pets entering Canada without their owners with them: There is an inspection fee, but no quarantine period for pets coming into the country. Within 10 days of departure to Canada a current Canada Veterinary Certificate must accompany pets. Vaccination proof must include vaccination date, trade name/serial number of the vaccine, proof the vaccine was licensed by the dog's country of origin, and signed by the veterinarian.

A veterinary health certificate is usually only available by contacting CFIA's Export Contacts (1-800-442-2342); however, a model veterinary health certificate may be provided under certain circumstances.

- **Consular Section of Embassy of Mexico** (services for non-Mexicans: taking pets into Mexico)
http://portal.sre.gob.mx/was_eng/

Visitors are allowed to bring up to two dogs into the country. A health certificate, issued not more than 72 hours before the animal enters Mexico, must be obtained (in duplicate) by a licensed veterinarian or other official authority with the name and address of the pet's owner, the animal's breed, sex, and age, and confirmation of a clean bill of health. Proof of inoculations against rabies and distemper at least 15 days before arriving in Mexico is also required.

It is also very important to confirm your country's reentry procedures for your pet. Exit permits for pets are also required and can be obtained via SAGAPRA at:
<http://www.sagarpa.gob.mx/english/Pages/Introduction.aspx>; this is a free service.

Other Considerations

Questions are often raised about assisting passengers with disabilities who need or request medical attention. Make sure you know your company's policy on contacting medical personnel to assist any customer whether the person has a disability or not.

Section 3: Review and Discussion Questions 1 - 15

Read each question below. Choose the best answer.

1. Mary wants to help a passenger with crutches board her coach, but is not sure how. Mary should:
 - A. Remain quiet and let the passenger try to board the coach without assistance.
 - B. Take the passenger's crutches and offer her arm for boarding assistance.
 - C. Ask "How may I assist you today?" and then wait for the customer's response.
 - D. Ask another passenger to help the person board the coach.
2. Drivers and customer service staff should:
 - A. Speak in a normal tone and speed unless the customer requests otherwise.
 - B. Politely decline to repeat or write down information if requested, to save time.
 - C. Speak to the customer's companion rather than to the customer with a disability.
 - D. Refuse to modify usual procedures to accommodate a passenger with a disability to avoid annoying other passengers.
3. When assisting a person with a visual impairment:
 - A. Ask, "How may I assist you?"
 - B. Identify yourself as an employee.
 - C. Inform the person of obstacles.
 - D. Orient the person to his/her surroundings before you leave.
 - E. All of the above.
4. If a person with a visual impairment asks for assistance, it is best to:
 - A. Take the customer's arm and guide him or her.
 - B. Let the customer take your arm for guidance.
 - C. Stay on the same side as the customer's guide dog.
 - D. Take the guide dog's harness and talk to the dog as a friendly gesture.
5. In helping a person who is blind or who has a visual impairment through a crowded terminal to stairs, Carlos should say:
 - A. "Be careful of this aisle and hold onto the railing as we go down these steps."
 - B. "The aisle is quite narrow here. Now we are about to go down a long stairway. There will be about 15 steps. The railing is on the right."
 - C. "People shouldn't block the aisles like this with their luggage. I wish they'd put an escalator in over here so people like you wouldn't have to worry about the stairs."
 - D. "I'm not sure you can get through this terminal to the main gate. Maybe you should consider taking a limousine instead."

6. Everett notices that a passenger does not respond when he speaks to her about her destination. She also seems to misunderstand his announcements. He wants to communicate effectively with her. Effective communication includes:
- A. Moving to a quieter place to talk
 - B. Writing her a note with stop announcements and tapping her shoulder or arm lightly to get her attention
 - C. Facing her directly and using facial expressions and gestures to get his message across
 - D. All of the above
7. Upon boarding, Seth informs the driver that he sometimes has epileptic seizures. Between Rochester and Buffalo Seth has this type of seizure. The driver should:
- A. Stop the vehicle in a safe place, ask nearby passengers to move away from Seth, ease him to the floor on his back, loosen clothing around the neck, and place a soft jacket under his head, and then resume his route when Seth is coherent.
 - B. Call an ambulance and leave Seth in his seat. Resume route when the ambulance arrives.
 - C. Ask other passengers to help him restrain Seth and put a pencil between his teeth so he doesn't bite his tongue. Resume the route.
 - D. Try to communicate with him and make sure he is comfortable. Resume the route.
8. When assisting people with disabilities:
- A. Treat adults as adults.
 - B. Be willing to repeat information.
 - C. Be patient.
 - D. Remain calm and avoid arguing or talking loudly.
 - E. All of the above
9. People-first language means using words and phrases such as:
- A. Handicapped person
 - B. Mentally retarded
 - C. Physically-challenged
 - D. Person with a disability

Based on what you have just learned about good customer service, how would you respond to each of the following situations? Write your answers.

10. You see a man in a wheelchair approaching your motorcoach. You walk up to him, take hold of his wheelchair, and say, "I will be glad to help you into the coach." The man replies, "Please don't grab my wheelchair."
11. A lady who appears to be blind is boarding your motorcoach. She seems like she needs help and you offer assistance. She tells you, "No thank you, I don't need any help right now."
12. You are boarding a motorcoach. Several people are waiting to board. An individual using a wheelchair enters the boarding area and asks to be boarded immediately and seated in the right front seat next to the window. What should you do? What would make your decision making easier?

13. Amy waits on a customer who is blind. She approaches him, takes his arm, and tells him she must escort him onto the motorcoach before all other customers because it is company policy for service delivery to customers with disabilities. Did Amy do anything wrong? What could or should she have done differently?
14. Malcolm, who is a person with a disability, approaches with his suitcase. He asks for a round-trip ticket to Washington, D.C., and gives the dates. Sheila asks if he is traveling alone. Malcolm says yes, and hands her his credit card to pay for the ticket. Sheila refuses his credit card, saying he must travel with a companion and pay in cash. What did Sheila do wrong? What could or should Sheila have done differently?
15. Kyle, a driver, is boarding customers. Tony, a young man boarding the motorcoach, tells Kyle that he is blind. Kyle checks Tony's ticket for his destination and makes a mental note to announce the stop audibly. The motorcoach does not have a public announcement/sign system to indicate upcoming stops. What else should Kyle have done?

Section 3: Answers and Explanations for Questions 1 – 15

1. Amy is uncertain about how to help a passenger with crutches board her coach. Amy should: C is correct. Ask, "How may I assist you today?" and then wait for the customer's response.
2. Drivers and customer service staff should:
A is correct. Speak in a normal tone and speed unless the customer requests otherwise.
3. When assisting a person with a visual impairment: E, "all of the above," is correct: Ask, "How may I assist you?" Identify yourself as an employee. Inform the person of obstacles. Orient the person to his/her surroundings before you leave.
4. If a person with a visual impairment asks for assistance, it is best to: B is correct: Let the customer take your arm for guidance
5. In helping a person who is blind through a crowded terminal to stairs, B is correct. Carlos should say: "The aisle is quite narrow here. Now we are about to go down a long stairway. There will be about 15 steps. The railing is on the right."
6. Everett notices that a passenger does not respond when he speaks to her about her destination. She also seems to misunderstand his announcements. He wants to communicate effectively with her.: D, "all of the above," is correct. Permissible communication includes: Moving to a quieter place to talk; writing her a note with stop announcements and tapping her shoulder or arm lightly to get her attention; facing her directly and using facial expressions and gestures to get his message across.
7. Upon boarding, Seth informs the driver that he has epileptic seizures sometimes. Between Rochester and Buffalo Seth has this type of seizure. A is correct. The driver should: Stop the vehicle in a safe place, ask nearby passengers to move away from Seth, ease him to the floor on his back, loosen clothing around the neck, and place a soft jacket under his head. Resume his route when Seth is coherent.
8. When assisting people with disabilities: E, "all of the above," is correct: Treat adults as adults. Be willing to repeat information. Be patient. Remain calm and avoid arguing or talking loudly.

9. D is correct. People-first language means using words and phrases such as: “Person with a disability.” Here are appropriate responses to questions 10-15:
 10. Never touch a person’s wheelchair without permission. Always ask if a person needs help and also ask how you may provide the appropriate assistance. Listen and follow the passenger’s instructions.
 11. Allow the passenger to board independently, and watch carefully in case she changes her mind and does need help.
 12. Advise the customer that if the seat is open you will keep that seat available for him, but he will have to wait to board according to your company’s policy.
 13. Amy should not have assumed that the customer needs or wants to be led by the arm to the motorcoach. After asking, “How may I assist you?” Amy should proceed by following the customer’s instructions. Amy may suggest, but not require pre-boarding.
 14. Sheila cannot require that Malcolm travel with a companion and/or pay cash. This is an example of blatant discrimination.
 15. Kyle is required by law to announce stops at major destinations, transfer points, and at the request of a passenger with a disability. He could let Tony know that he will be announcing these stops and will notify him when the coach is approaching his particular stop.
-

SECTION 4

Operation and Maintenance of Accessibility Equipment

Operators should be trained in the use of accessibility equipment on the motorcoach. Communication between employees involved in operations, sales, and maintenance is just as important in providing good service to customers using wheelchairs and other mobility aids such as walkers, canes, or crutches.

Sales and/or Operations Department

Whenever the sales and/or operations department receives a request for an accessible motorcoach, the appropriate department should notify the maintenance department. The customer should be informed of the capacity of the coach’s lift equipment and any limitations of the coach’s lift equipment.

Maintenance Department

The maintenance department should check the operation of the lift on a regular basis. If possible, it should be done on a daily or regular service basis. It is far better to discover and correct a problem before the motorcoach is assigned to a trip. As part of preparing the coach for dispatching, the maintenance department should reconfigure the coach seats.

Pre-Trip and Post-Trip Inspection

Companies should consider allowing an additional 15 minutes for accessible coach trips. This will allow the driver adequate time to check the lift operation and report any problem for repair or replacement. In the long run, it may save replacing a coach once it is dispatched on the road.

Before you begin, inspect your vehicle:

1. Familiarize yourself with the limitations of your lift equipment.
2. Cycle your lift and review your company's passenger assistance guidelines.
3. Check securement equipment to ensure necessary parts (belts, hooks, locks, and straps) are present, clean, and in working order.
4. Check the coach floor for any debris or dirt that may make securement difficult.
5. Make sure you have a pad and pen available in case it's needed for customer communication.
6. If a passenger using a wheelchair is expected during a trip, reconfigure the seats in the tie down area, and prepare for loading that passenger.
7. Check for ramp or other loading device if you will be stowing a wheelchair.
8. Check for confirmation of connecting carrier notification if a passenger has a scheduled service trip.
9. Complete your pre-trip vehicle safety inspection.
10. If it is a charter, check to see if you have an ADA service request.
11. Check remote control for lift operation and manual operation of the lift.

Boarding Passengers Using the Lift

Motorcoach lifts make it possible to board and de-board passengers using wheelchairs with little physical effort and with the assistance of only one person; however, lifts are potentially dangerous, they should only be operated by properly trained staff, and must be maintained regularly to ensure smooth and trouble-free operation.

When boarding, it is recommended that you board passengers who use wheelchairs first, then allow others to board the coach. When disembarking, it is recommended that you de-board passengers who use wheelchairs last, allowing others to exit first. This will allow you to devote full attention to the operation of the lift and comply with company policy of standing by the door as customers exit the motorcoach.

Motorcoach Lift Operations

Actual lift operations vary from manufacturer to manufacturer, and all provide specific instructions in the form of videos, handbooks, driver instruction cards, and/or decals on or near lift controls. The operating company should ensure that personnel are trained to safely use the type of lift equipment operated by your company. Periodic refresher training is recommended. The following sections list some basic guidelines for operating the lift equipment safely and properly.

Lift Controls

Check lift controls during pre-trip and post-trip inspection. Despite the differences between manufacturers, all lifts have some basic control features that provide power to the lift-operating system, prevent the lift from being operated unintentionally, power the raising and lowering of the lift platform, and allow the lift to be raised or lowered manually in the event of equipment malfunctions. Always check the manual lift-operating system.

Boarding Passengers Who Use Wheelchairs

1. Note the weather as it may affect your boarding location or operational procedures.
2. Inform passengers of the lift's operational limitations including minimum and maximum weight capability and door height.

3. Stop the coach at a point that will allow the lift to be deployed at a spot that is level and free of obstacles. The coach can be positioned one to two feet from a curb.
4. Secure the vehicle. ALWAYS engage the parking brake before attempting to operate the lift.
5. Rearrange the seats to accommodate your passengers with disabilities if this was not done by the maintenance department or during pre-trip inspection.
6. Turn on power to the lift.
7. Exit the coach and open and secure the door(s) to the lift.
8. Disengage the lift platform from any vehicle restraints, unfold the platform, and raise the handrails as necessary.
9. Make sure you and others are clear of the lift's moving parts during operation.
10. Lower the lift platform until it makes level contact with the ground and the front barrier lowers for boarding.
11. You may recommend (but not require) that the passenger using the wheelchair board facing backwards. The final decision is the passenger's.
12. Be sure the wheelchair is centered, both front to rear, as well as side-to-side. This will help to ensure the lift operates properly.
13. If the passenger is using a power chair, ask him to turn the power off.
14. Ask the customer to set the wheelchair brakes.
15. Make sure the foot barrier of the lift platform is up and locked. If the lift has a safety strap be certain that it is secured across the front of the lift. (The lift shouldn't operate if the safety strap isn't across the front.)
16. Communication is important. Tell the passenger what you are doing. For example, tell the passenger as you prepare to raise the lift.
17. Observe the operation of the lift and the movement of the passenger at all times as you raise the lift. Do not allow yourself to become distracted by outside events. It is important that you focus on the operation of the lift.
18. It is best to move the lift up or down without stopping.
19. If the coach has a slider door, you can leave it closed while raising the lift. Once the lift is at the floor position of the coach, open the door. This will save heat in the winter and air conditioning in the summer, and be more comfortable for the other passengers on board.

20. After the platform stops at the floor position of the coach, be sure the flap is over the entranceway. Enter the coach, unlock the wheelchair's brakes, and move the passenger to the seating area, if needed.
21. Once inside the coach, the wheelchair should be secured before lowering the lift unless you are able to close the door. It is not good practice to have the door open without the lift at the top of its cycle.
22. There are safety switches which should prevent you from operating the lift unless the strap is in place and from operating the coach unless the door is securely closed. Do not rely on them. Always follow proper procedure and make sure that the safety strap is secure or the front barrier is locked.
23. If the lift cannot handle the passenger and the mobility device, store the mobility device in the baggage compartment.

Wheelchair Securement

If you have questions about how to secure a customer's wheelchair, scooter, or mobility device, ask. In most cases your customer will appreciate your desire to secure the mobility device properly. You both want a pleasant ride. In some situations, the two of you will need to work together and do the best you can to come up with a solution.

- Properly securing wheelchairs is extremely important. Crash-test studies have shown that a passenger in a wheelchair can be vulnerable to injury at speeds of less than 20 miles per hour.
- For maximum safety, the wheelchair and the occupant should be properly secured prior to moving the vehicle. While research continues on improvements for securement systems, most of today's wheelchair restraint systems are based on a four-point tie-down—meaning that each of the four corners of the chair are restrained by a belt to a permanently mounted floor bracket. While each system is somewhat different from the others, the following procedures are generally applicable to them all.

Securing Scooters

Three-or four-wheeled power scooters will be more difficult to secure than wheelchairs since wheelchair restraint systems are based on the four-point tie down system. Most three-or four-wheeled scooters cannot be secured in the front and must be secured in the rear. If the scooter does not fit in the securement positions, stow the scooter in the baggage compartment. Refer to company policy if the scooter is too heavy for the driver to stow underneath the bus.

Securement Recommendations

1. Ask the passenger if he needs assistance. Make sure the passenger understands that the wheelchair or wheeled mobility device must be secured, if that is your company policy.
2. Position the wheelchair evenly between the four floor brackets, and apply the chair's brakes.
3. If the passenger is using a power chair, make sure that the power switch is off.
4. Separate the front and rear wheelchair securement belts.
5. Always secure the front of the chair first, making sure both casters are not facing toward the sides.

6. Attach the top hooks of the front belts to a solid frame member of the wheelchair and the anchor ends to the floor brackets, if needed.
7. Maintaining a belt angle of about a 45-degree angle between the vehicle floor and the wheelchair attachment point, remove slack in the front belts and lock.
8. Attach the top hooks of the rear belts to a solid frame member of the wheelchair and the anchor ends to the floor brackets.
9. Maintain to the greatest extent possible a belt angle of about 45 degrees; remove slack in the rear belts.
10. Securely tighten and lock the rear belts.
11. Avoid leaning on the passenger or bumping his legs.

Securing the Passenger

1. Ask the passenger if she needs assistance first.
2. Under the ADA, use of lap belts and shoulder harnesses by passengers with disabilities is optional unless all passengers use them. If none of the other motorcoach passengers are required to use the seatbelts and shoulder harnesses, then the person using the mobility aid cannot be required to do so.
3. Separate the lap and shoulder belts.
4. Place the lap belt around the passenger.
5. Place each end of the lap belt between the side panels and the seat or through the gap between the chair and the seat behind the passenger (CAUTION: Never put the lap belt over the armrests or the side panel of the wheelchair and never used the lap and shoulder belt unless the passenger's wheelchair is also secured.)
6. Connect the anchor ends of the belt to either the floor brackets or the rear wheelchair securement belts, as required by the manufacturer.
7. Connect the shoulder belt to the lap belt.
8. Avoid leaning on the passenger or jarring the wheelchair.
9. Tighten the lap belt comfortably but securely around the passenger (across the hip/pelvic area, not the abdominal area).
10. Ask the passenger if he is comfortable.
11. Adjust the shoulder belt as necessary.

De-boarding Passengers who Use Wheelchairs

1. Exit the coach and open and secure door(s) to the lift.
2. Disengage the lift platform from any vehicle restraints, unfold the lift, and raise the handrails as necessary. Make sure the front barrier of the lift platform is in the locked, upright position to prevent the wheelchair from rolling off the lift. Be sure the flap is across the entranceway.
3. Re-enter the coach.
4. Detach securement belts. If necessary, assist the passenger with release of the brake.
5. If the passenger needs assistance moving onto the lift platform, push the wheelchair forward, and center it onto the lift platform.
6. There is no requirement that wheelchairs be equipped with brakes. You may remind the passenger to set the brakes if the wheelchair is equipped with manual brakes.
7. Exit the coach and prepare to lower the lift platform.
8. Cue the passenger as you prepare to lower the lift.
9. Keep one hand on the wheelchair as you lower the lift platform.
10. Observe the operation of the lift and the movement of the passenger at all times as you lower the lift. Do not allow yourself to become distracted by outside events. It is important that you focus on the operation of the lift.
11. Make sure you and others are clear of the lift's moving parts during operation of the lift.
12. Lower the lift platform until it makes level contact with the ground and the front barrier lowers for de-boarding.
13. Release the wheelchair brakes.
14. At ground level, assist the passenger using the wheelchair off the lift platform.

*** Important to Remember ***

1. Wheelchairs are personal mobility aids.
2. A wheelchair is part of the passenger's personal space.
3. Do not touch a customer's wheelchair without permission.
4. Do not hold or lean on the wheelchair or mobility aid except when necessary to move the wheelchair.
5. Ask the customer how you may assist him with his mobility device or mobility aid.

6. Wheelchairs and other mobility aids are individualized. Do not make assumptions about how they work. Be sure to watch for customer's loose clothing and the position of her legs, feet, arms, and hands to avoid injury while operating the lift and securing the customer's wheelchair.

Section 4: Review and Discussion Questions 1 – 6

1. Below are 10 steps in lift operation and for boarding a passenger using a wheelchair or mobility aid. Number these steps in the correct order from 1–10.

- _____ Lower the lift platform until it makes level contact with the ground.
- _____ Inspect all belts, hooks, and straps for defects.
- _____ Re-arrange seats to accommodate passengers who use wheelchairs if the maintenance department has not already done so.
- _____ Turn on the power to the lift.
- _____ Secure the vehicle, engage the parking brake.
- _____ Make sure that the foot barrier on the platform is secured and locked.
- _____ Stop the coach on level ground, one to two feet from the curb, in an area free of obstructions.
- _____ Open the door to the lift.
- _____ Inform passengers of the lift's operational limitations including minimum and maximum weight capability and door height.
- _____ Tell the passenger that you are preparing to raise the lift.
- _____ Disengage the lift platform, unfold the platform, and raise the handrails.

Read each statement below. Circle "T" if you think the statement is true, and circle "F" if you think the statement is false.

2. When deploying a motorcoach lift, the coach should be stopped at a level spot and the parking brake should be engaged.

T F

3. When boarding and de-boarding a person using a wheelchair, always push the wheelchair into place on the lift whether or not the passenger requests such assistance.

T F

Read each statement below carefully. Circle the correct letter for the best answer.

4. To ensure that they are in working condition, motorcoach lifts should be:
 - A. Cycled on a regular basis and if possible, on a daily or servicing basis
 - B. Cycled on a daily basis
 - C. Cycled after each destination stop
 - D. Cycled on a weekly basis
5. Proper wheelchair securement includes:
 - A. Asking the customer if he needs assistance
 - B. Requiring all passengers who use wheelchairs be secured with the lap belt and shoulder harness
 - C. Making sure that the secured wheelchair does not move more than six inches in any direction
 - D. Leaning on the wheelchair, without permission, if it is necessary for securement

6. Operating the lift includes the following steps:
- A. Opening the door to the lift
 - B. Turning on the power to the lift
 - C. Telling the customer that you are getting ready to raise the lift
 - D. All of the above

Section 4: Answers and Explanations for Questions 1 - 6

1. Steps in lift operation for boarding a passenger who uses a wheelchair, with the number showing the step's correct position in the sequence:

#9 - Lower the lift platform until it makes level ground contact.
#1 - Inspect all belts, hooks, and straps for defects.
#5 - Re-arrange seats to accommodate passengers who use wheelchairs, if the maintenance department has not already done so.
#6 - Turn on the power to the lift.
#3 - Secure the vehicle, engage the parking brake.
#10 - Make sure that the foot barrier on the platform is secured and locked.
#2 - Stop the coach on level ground, one to two feet from the curb.
#7 - Open the door to the lift.
#4 - Inform passengers of the lift's operational limitations including minimum and maximum weight capability and door height.
#11 - Tell the passenger that you are preparing to raise the lift.
#8 - Disengage the lift platform, unfold the platform and raise the handrails.

2. When deploying a motorcoach lift, the coach should be stopped at a level spot and the parking brake should be engaged. Answer: TRUE.

3. When boarding and de-boarding a person using a wheelchair, always push the wheelchair into place on the lift whether or not the passenger requests such assistance. Answer: FALSE.

4. To ensure that they are in working condition, motorcoach lifts should be:
A is correct: Cycled on a regular basis and if possible, on a daily or servicing basis.

5. Proper wheelchair securement includes:
A is correct: Asking the customer if she needs assistance.

6. Operating the lift includes the following steps:
D is correct, "all of the above:" Opening the door to the lift, turning on the power to the lift, and telling the customer that you are getting ready to raise the lift.
-

SECTION 5

Manual Boarding of Customers who Use Wheelchairs and Other Mobility Devices

Per 49 CFR Part 37(h), the U.S. Department of Transportation requires that operators receive training in boarding assistance, as appropriate to their duties.. Boarding assistance includes assisting customers on and off coaches at start and completion of travel and at rest stops. The U.S. Department of Transportation does not require a particular method of providing boarding assistance onto non-accessible coaches. The preferable method of providing boarding assistance is through the use of lift equipment.

With the 48-hour advance notice rule in effect and the increased number of accessible motorcoaches, manual boarding should not be necessary and is not an acceptable alternative to providing service in an accessible motorcoach. In cases where a coach is not accessible or accessibility equipment becomes inoperable in an emergency, the following statement addresses manual boarding:

If there is an emergency en route, you may have to evacuate the motorcoach or transfer passengers to another motorcoach without using a wheelchair lift.

If rescue teams are present, they can safely move injured passengers with disabilities. If not, you will have to physically assist passengers in transferring from the motorcoach. Don't touch a customer's wheelchair without permission. The wheelchair is part of his or her personal space. Be sure to get the customer's input before attempting a manual lift. Ask the customer how you can assist him and decide together the safest and most comfortable way to make the move. Do not touch the customer until he is ready. Always transfer the way the customer requests. The customer knows what works best for him.

SECTION 6

Handling and Storing Wheelchairs and Other Mobility Devices and Segway Policy

People with disabilities use different types of wheelchairs and other wheeled mobility devices. A wheelchair can be designed with any number of modifications. Types of wheelchairs include:

- Manual wheelchairs
- Power wheelchairs
- Three or more-wheel power chairs or scooters

Some of the more common variations you may see include:

- Extended backs for upper body and neck support
- Brake lever extensions for those unable to reach the standard brake levers
- Removable footrests and armrests
- A work tray
- A communication board/device for those with communication impairments
- A reclining back, adjustable to different angles
- Pneumatic tires for a smoother ride
- Sports chairs made of lighter-weight tubing and tires cambered at the bottom wheels, which are wider at the bottom than at the top.

Design Features of Typical Wheelchairs

Since you are most likely to encounter this type of wheelchair, with any of the above modifications, it is important to know a little about their basic design features. These features include:

- Push handles and handgrips that relieve stress on the hands and provide greater comfort
- Brake levers used to stop/lock wheels from turning
- Tipping level/tilt bar to help prevent tipping over backward
- Armrests provide comfort and support to the passenger. If the armrests are removable, they may make transfers easier.
- Footrests provide comfort and support to the passenger. If the footrests are removable they may make transfers easier.
- Casters make turning easier and allow the wheelchair to fit through narrow doorways and spaces.

The person who uses a wheelchair or other mobility aid has the right to disembark at rest stops along with the other passengers. Consequently, the wheelchair or other mobility aid must be easily retrieved from the baggage bay. Handle all passenger equipment with care, as wheelchairs and other mobility aids are personal property of your passengers. Your company is liable for damage to the equipment while it is in your care.

Design Features of Power Chairs

It is important for personnel to have general knowledge of the operation of power chairs. Many power chairs have been modified for the personal needs of the user, but some of the important basic features of the power chair include:

- Battery (often equipped with a battery for each rear wheel)
- Hand control or joystick though the controls can be personalized to meet the needs of the user such as head and mouth or breath-activated controls (used to regulate the movement and speed of the wheelchair)
- Toggle switch (to turn the power on and off)
- Wheelie bars (anti-tipping devices that provide stability for going up and down inclines)

Wheelchair Availability and Storage

Whenever possible, wheelchairs and other mobility aids such as walkers, crutches, and canes should travel in the passenger compartment with the passenger. However, sometimes the size of these aids requires that they be transported in the luggage bay. Manual and power wheelchairs, scooters, and other mobility aids such as walkers, crutches, and canes that cannot travel with the passenger will be stored as luggage. These items are stored at no additional cost to the passenger, in addition to the passenger's free baggage allowances. Make sure to place a baggage claim ticket on all items, and give the passenger the claim check(s).

Segway Policies

Some individuals with disabilities may use a Segway as a personal mobility aid. According to the U.S. Department of Transportation, a Segway, when used by a person with a disability as a mobility device, is part of the broad class of mobility aids that 49 CFR Part 37 intends may be accommodated. An individual with a disability who uses a Segway as a mobility device may be permitted to use the lift.

Transportation providers, including motorcoach companies, may establish their own general policies on Segways and other devices. When a Segway is being used as a mobility device, however, the provider

may permit the passenger and his device onto the vehicle if they can be safely accommodated. The motorcoach operator should inform passengers using Segways or other mobility devices of the motorcoach lift's operational limitations including minimum and maximum weight capability and door height. Where a device is determined to pose a direct threat to the safety or health of other passengers that cannot be eliminated by modification of policies, procedures, practices, or by provision of auxiliary aids or services, the motorcoach company should consult the appropriate U.S. DOT operating administration for guidance and establish a service policy in accordance with that guidance.

Transporting Oxygen

The ADA requires that motorcoach operators allow individuals with disabilities to travel with a respirator or portable oxygen. The U.S. DOT rules on transporting hazardous materials on buses are specified in 49 CFR 177.870, Subpart E, "Regulations Applying to Hazardous Material on Motor Vehicles Carrying Passengers for Hire." Containerized oxygen is considered a hazardous material. A cylinder of oxygen that is used by a passenger for medical reasons is not regulated under the hazardous material regulations; however, spare oxygen cylinders must be transported in conformance with the regulations. Therefore, proper marking, labeling, and shipping paper documentation is necessary for spare cylinders. When carrying oxygen cylinders, please consult 49 CFR 177.870 for specific requirements. This information is available using the document search function at the Government Printing Office (GPO) website at www.gpo.gov.

The U.S. DOT Pipeline and Hazardous Materials Safety Administration (PHMSA) developed and released guidance for the safe transportation of medical oxygen on motorcoaches and trains in 2006. That guidance can currently be downloaded at <http://phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Files/gstomo.pdf>.

Section 6: Review and Discussion Questions 1 - 2

Read each statement below. Circle "T" if you think the statement is true, and circle "F" if you think the statement is false.

1. Wheelchairs and other mobility aids such as walkers, crutches, and canes, should always travel in the baggage bay to prevent injury to other passengers.
T F
2. Motorcoach companies can charge an extra fare for storage of mobility devices.
T F

Section 6: Answers and Explanations for Questions 1 - 2

1. Wheelchairs and other mobility aids such as walkers, crutches and canes, should always travel in the baggage bay in order to prevent injury to other passengers. FALSE.
 2. Motorcoach companies can charge an extra fare for storage of mobility devices. FALSE.
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SECTION 7

References

1. Easter Seals Project ACTION and American Public Transportation Association. (2010). *ADA Essentials for Transit Board Members: Fundamentals of the Americans with Disabilities Act and Transit Public Policy*. Washington, D.C.
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SECTION 8

Glossary

Accessible Bus

An accessible bus or accessible Over-the-Road Bus (OTRB) that includes a lift for getting passengers who cannot climb steps onto a bus, specific locations for securing the wheelchair to prevent it from sliding, and other features to ease travel for passengers with disabilities.

Charter and Tour Service

An OTRB company provides demand responsive service if it provides transportation to individuals via OTRB through a charter/tour system.

Equivalent Service

Equivalent service is service provided to passengers with disabilities that is equal to the service provided to passengers without disabilities (e.g., a different accessible vehicle is used to provide service to the same traveling points for the same cost within the same time frame as a regularly scheduled OTRB). Equivalent service requires that passengers be allowed to travel in their own wheelchairs.

Fixed-Route System

Transportation that runs along a prescribed route according to a fixed schedule. Urban bus and rail systems are the most typical examples of fixed-route service. An OTRB company provides fixed route

service if it provides transportation in which the OTRB is operated along a prescribed route according to a fixed schedule.

Large Operator

Under the U.S. Department of Transportation's regulatory definition, a large operator or large OTRB company has gross annual transportation revenues equal to or exceeding \$8.7 million.

Mixed Service

An OTRB company provides mixed service if it provides both fixed route and demand responsive service, and 25 percent or less of its OTRB fleet is used in fixed route service.

Over-the-Road Bus (OTRB)

A bus characterized by an elevated passenger deck located over a baggage compartment. Intercity carriers, regional carriers, local commuter, and shuttle bus services, and charter/tour companies use OTRBs. This bus is also referred to as motorcoach.

Private Entities “Primarily Engaged” in the Business of Transporting People

Private companies that provide either general or special (including charter) transportation service to the general public on a regular and continuing basis.

Private Entities “Not Primarily Engaged” in the Business of Transporting People

Private companies that provide transportation services, but transportation is incidental to their primary business.

Service Animal

U.S. Department of Transportation (U.S. DOT) definition: A 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 visual impairments, alerting individuals who are deaf or hard of hearing to intruders or sounds, providing minimal protection or rescue work, pulling a wheelchair, or fetching dropped items.

U.S. Department of Justice (U.S. DOJ) definition: Service animal are defined as dogs that are individually trained to do work or perform tasks for people with disabilities. Service animals are working animals, not pets. The work or task a dog has been trained to provide must be directly related to the person's disability. Dogs whose sole function is to provide comfort or emotional support do not qualify as service animals under the ADA.

Small Operator

Under the U.S. Department of Transportation's regulatory definition, a small operator or small OTRB company has gross annual transportation revenues less than \$8.7 million.

SECTION 9

Resources

All resources are available through Easter Seals Project ACTION at www.projectaction.org

Facts about Service Animals for Motorcoach Operators (2011)

A two-sided bookmark that includes U.S. DOT ADA rules related to service animals on motorcoaches and tips for customer service etiquette.

Facts about Service Animals and Transportation (2013 bookmark/2014 poster)

An updated bookmark on service animals that can be used by motorcoach or transit operators. The bookmark includes U.S. DOT ADA rules and addresses customer service etiquette. The same information is available in an 11x17 poster.

Motorcoach Operator's ADA Pocket Guide (2010/Revised 2012)

A 10-panel brochure that includes general guidelines for serving customers with disabilities, including passengers using wheelchairs, customers traveling with service animals, ADA requirements pertaining to motorcoach operations and rest stops and interline service, and an operator's checklist.

Safety & Securement: Equipment Operation for Passengers with Disabilities: ADA Training Program for Motorcoach Companies (2012 DVD release of 2002 VHS)

A video describing the process of serving customers who use mobility devices. The DVD addresses the securement process and etiquette.

Status Report on the Use of Wheelchairs and Other Mobility Devices on Public and Private Transportation (2008)

A 75-page report that provides an overview of current issues and promising practices regarding use of wheelchairs and other mobility devices on public and private transportation. Chapters cover transit vehicle and equipment design, wheelchair design, transit operations and training, regulation and policy.