

# Northwoods Transit Connections

## Americans with Disabilities Act (ADA) Complementary Paratransit Plan

**Revised on:** April 25, 2024

**Adopted by:** Oneida-Vilas Transit Commission (OVTC)  
Northwoods Transit Connections

Original ADA Plan

**Adopted on:** May 13, 2016

## Policy Updates – Activity Log

Northwoods Transit Connections will regularly review its policy to determine if modifications are necessary. The table below documents reviews/revisions made to the plan.

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Notes
April 25, 2024	Update ADA Paratransit Plan	Barb Newman	Approved by OVTC, Board of Directors
June 3, 2016	Update No Show Policy	Jim Altenburg	Approved by OVTC, Board of Directors
May 13, 2016	Develop ADA Paratransit Plan	Jim Altenburg	Approved by OVTC, Board of Directors

# Table of Contents

## **I. GENERAL**

- A. Description of Service
- B. Introduction
- C. Policy
- D. Objectives
- E. Public Participation and Information

## **II. OPERATIONS AND VEHICLES**

- A. General – Service Criteria
  - 1. Response Time
  - 2. Fares
  - 3. Service Area
  - 4. Hours and Days of Service
  - 5. Trip Purpose
  - 6. Availability of Information, Reservations Capability and Stop Announcements
  - 7. Capacity Constraints and Monitoring
- B. Vehicle Selection, Maintenance and Accessibility

## **III. ADA PARATRANSIT ELIGIBILITY DETERMINATION, APPLICATION AND APPEALS PROCESS**

- A. Eligibility Criteria
- B. Application Process
- C. Appeals Process

## **IV. PASSENGER RESPONSIBILITIES**

- A. General Passenger Condition
- B. Requesting Service
  - 1. Trip Reservation
  - 2. Negotiating a Pickup time
  - 3. Subscription Service
  - 4. Reasonable Modifications
  - 5. Trip Denials
  - 6. Cancellations
  - 7. 'No Shows'
- C. Riding Complementary ADA Paratransit Service
  - 1. Pickup Time Window
  - 2. Driver Assistance
  - 3. Accommodations of Wheelchairs
  - 4. Ramp/Lift and Securement Use
  - 5. Personal Care Attendants (PCA)

## **V. MISCELLANEOUS**

- Visitor Policy
- Medical Equipment
- Service Animals and Accommodation of Animals
- Carry-on Packages
- Inclement Weather
- Lost and Found

## **VI. COMPLAINT PROCESS**

- How to File a Complaint

## **ATTACHMENTS**

- Rules of Conduct Policy
- Reasonable Modification Policy
- No Show Policy
- Complaint Form
- Appeals Process
- Trip Denial Log
- Paratransit Application – See Northwoods Transit Connections website.

## I. GENERAL

### A. Description of Service

**Northwoods Transit Connections** operates services on a fixed route basis, commingled on the same vehicle as ADA complementary paratransit. **Northwoods Transit Connections** complies with ADA requirements with respect to such services.

### B. Introduction

DOT regulations and transportation-related provisions of the Americans with Disabilities Act (ADA) of 1990, Section 504 of the Rehabilitation Act of 1973, as amended and 49 CFR Parts 27, 37, 38 and 39 set specific requirements for transit providers to ensure that individuals with disabilities are not excluded from, denied the benefits of, or subject to discrimination.

The ADA applies to almost all providers of transportation service, whether private or public, and whether or not an entity receives Federal financial assistance.

The Americans with Disabilities Act of 1990 (ADA) requires that public entities that operate fixed route transportation services also provide complementary paratransit service for individuals whose disabilities make them unable to use the fixed route system.

ADA requires that paratransit service be “comparable” to the fixed route service in terms of service levels and availability. In addition, the regulations require that public entities that are subject to the ADA regulations develop and administer a process for determining if individuals who request service meet the regulatory requirements for eligibility.

The **Northwoods Transit Connections ADA Complementary Paratransit Plan** is designed to inform ADA paratransit riders about **Northwoods Transit Connections’** special transportation service. This document includes policies and procedures, rules and regulations, and guidelines for use of the complementary paratransit **Northwoods Transit Connections**, along with answers to questions about the program.

All **Northwoods Transit Connections** paratransit customers should review this manual carefully and refer to it whenever questions arise.

For additional information, please contact the **Northwoods Transit Connections** Transportation Coordinator at (715)420-0585. For people who are deaf, hard-of-hearing, deaf-blind, and speech disabled please use Wisconsin Relay 711 service <https://wisconsinrelay.com>.

### C. Policy

It is the policy **Northwoods Transit Connections** to comply with all the legal requirements of federal and state laws and regulations as they pertain to individuals with disabilities. If state laws and federal regulations are contradictory, the federal ADA regulations prevail. **Northwoods Transit Connections** provides quality transportation services without discrimination to all persons including persons with disabilities. Discrimination on the basis of disability against any person by **Northwoods Transit Connections** employees will not be tolerated or ignored.

**Oneida Vilas Transit Commission (OVTC)** as a recipient of federal financial assistance must develop a procedure for investigating, tracking, and resolving Title VI/ADA Nondiscrimination

complaints regarding its demand response public transportation service provided by **Northwoods Transit Connections**.

For information on **Oneida Vilas Transit Commission's** civil rights program, ADA obligations, and the procedures to file a complaint, contact Barb Newman, (715)420-0585 [barb.newmannorthwoodstransit@outlook.com](mailto:barb.newmannorthwoodstransit@outlook.com). For people who are deaf, hard-of-hearing, deaf-blind, and speech disabled please use Wisconsin Relay 711 service <https://wisconsinrelay.com>.

Additional Information is available in the Complaint Procedure section.

## D. Objectives

Complementary paratransit service meets the specific objectives of the ADA requirements by:

1. Providing demand-response "origin-to-destination"<sup>1</sup> transportation on specially equipped accessible vehicles designed to accommodate persons with disabilities.
2. Maintaining a trained staff for the operation and control of the service. For more information see the attached *Employee Training Information*.
3. Providing on-going mechanisms for persons with disabilities to provide input on the **Northwoods Transit Connections'** ADA demand response service.

## E. Public Participation and Information

Per the ADA, there needs to be a process for public input and ability to comment regarding any changes in any of its services. Also, providers of ADA paratransit service must provide for ongoing participation in the operation and assessment of associated services by individuals with disabilities.

**Oneida-Vilas Transit Commission** was formed in 2015 to provide transportation to older adults, persons with disabilities and the public in Oneida and Vilas Counties. **OVTC** is a legally organized independent governmental body that holds monthly meetings to discuss transportation services. Agendas are posted to [northwoodstransit.org](http://northwoodstransit.org), [oniedacountywi.gov](http://oniedacountywi.gov) and [vilascountywi.gov](http://vilascountywi.gov).

**OVTC** represents a broad cross section of individuals, social service provider groups, non-profit organizations, and local agencies, within Oneida and Vilas counties. The role of the **OVTC** is to promote and facilitate individual, group, and agency involvement in the planning and implementation of effective coordinated public transportation within the county.

OVTC member duties include:

- Advocate for transit dependent individuals.
- Strengthen public and community relations for **Northwoods Transit Connections**.
- Provide input to the development of service policies.
- Assist as feasible with resolution to customer service issues.
- Assist with fund development for **Northwoods Transit Connections**.

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<sup>1</sup> "Origin-to-destination" service means providing service from a passenger's origin to the passenger's destination. A provider may provide ADA complementary paratransit in a curb-to-curb or door-to-door mode. When an ADA paratransit operator chooses curb-to-curb as its primary means of providing service, it must provide assistance to those passengers who need assistance beyond the curb in order to use the service unless such assistance would result in a fundamental alteration or direct threat." §37.3

## OPERATIONS AND VEHICLES

### A. General – Service Criteria

U.S. Department of Transportation ADA regulations requires **Northwoods Transit Connections**, as a provider of complementary paratransit, to provide riders with disabilities and riders without disabilities, an 'equivalent level of service' for seven (7) service criteria:

- ✓ Response Time
- ✓ Fares
- ✓ Service Area
- ✓ Hours and Days of Service
- ✓ Trip purposes
- ✓ Availability of Information and Reservations Capability
- ✓ Capacity constraints

#### ***Response Time***

The elapsed time between a request for service and the provision of service is the same for riders with and without disabilities.

The **Northwoods Transit Connections** will schedule and provide paratransit service to any ADA paratransit certified individual at any request time on a particular day in response to a request for service made the previous day.

Telephone reservation requests are accepted 24-hours in advance Monday-Friday between 7:00am and 5:00pm. Advance reservations may be made up to **(2) two weeks** in advance of an individual's desired trip(s). If requests for service are made with less than the next day notice, **Northwoods Transit Connections** staff will attempt to schedule the trip.

#### ***Fares***

ADA fares can be no more than twice the amount charged for a full fare on the fixed route. Personal Care Attendants (PCA's) can travel with eligible clients for free but must have the same origin/destination. Companions/guests can travel with an eligible client for the same amount charged to the ADA eligible rider. **Northwoods Transit Connections** does not provide PCAs.

#### ***Service Area and Days and Hours of Service***

Riders with disabilities are able to request trips in the same area or areas as other riders and on the same days and during the same hours as other riders.

#### **Routes, Fares, and Service Hours**

See the **Northwoods Transit Connections** website for fares, routes, and service area information - <https://northwoodstransit.org>

#### ***Trip Purpose***

Since the fixed route service can be used for any trip purpose, so must the complementary paratransit service. There also can be no prioritization based on trip purpose; for example, medical trips cannot be given priority over recreational trips. **Northwoods Transit Connections** does not prioritize eligible paratransit trips based on trip type or trip purpose. Passengers will not be asked to provide information regarding their trip purpose.

### ***Availability of Information, Reservations Capability and Stop Announcements***

*Availability of Information* - **Northwoods Transit Connections** provides riders with disabilities the same access to the same information and reservation system as other riders.

*Reservations Capability* - Contact **Northwoods Transit Connections** staff if you need information in alternate formats that are not currently provided. (e.g. large print, audio, or accessible electronic files for riders with vision disabilities).

*Wisconsin Relay Service, 7-1-1* is a free service state of Wisconsin resource that assists with communication needs.

- <http://www.wisconsinrelay.com> provides full telephone accessibility to people who are deaf, hard-of-hearing, deaf-blind and speech disabled.

*Stop Announcements* – Vehicle operators are mandated to announce transfer locations, major stops on the fixed route bus system routes along the route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location. **Northwoods Transit Connections** drivers and operators shall announce any stop on request of an individual with a disability.

### ***Capacity Constraint and Monitoring***

The **Northwoods Transit Connections** ensures the level of service available to riders with disabilities is the same for riders without disabilities. To ensure service equivalency, **Northwoods Transit Connections** monitors trip denials, frequency of being wait-listed, and telephone hold times. **Northwoods Transit Connections** does not limit the number of trips an eligible passenger can make.

Performance data will be collected and reported in a ***Trip Denial Log*** for the purpose of establishing whether capacity constraints exist.

## **B. Vehicle Selection, Maintenance and Accessibility**

*Vehicle Selection* - **Northwoods Transit Connections** fixed route service complies with ADA in terms of providing accessible vehicles and ensuring new stops are accessible.

*Maintenance* - All vehicles in the **Northwoods Transit Connections** fleet will be properly maintained including the operative condition of all accessibility features available to individuals with disabilities. These features include lifts, ramps, securement devices, signage, and systems to facilitate communication. All accessibility features will be repaired promptly.

*Accessibility* - All **Northwoods Transit Connections** routes are accessible for mobility devices and disabled individuals.

Drivers shall pickup and disembark disabled passengers including mobility devices at all designated bus stops unless the lift or ramp cannot be deployed, the lift will be damaged if deployed, or temporary conditions preclude the safe use of the stop by all passengers.

In the event of an unsafe disembark location the driver shall temporarily use the next closest corner or safe bus stop to disembark the passenger as to not cause any damage to the lift or to harm the passenger.

## Inoperative Lifts and Ramps

Vehicles with inoperative lifts must be taken out of fixed route service as soon as possible (no later than the beginning of the vehicle's next service day) and inoperative equipment will be replaced promptly with an accessible spare vehicle. The inoperative lift will be repaired before the vehicle returns to service. For vehicles equipped with ramps, it may be possible to continue in service as long as the ramp can be and is deployed manually when necessary. If an inoperative ramp cannot be (or is not) deployed manually, **Northwoods Transit Connections** will apply the policy for a vehicle with an inoperative lift.

If there is no accessible spare vehicle available to take the place of a vehicle with an inoperable lift/ramp on a route, the vehicle with the inoperable lift/ramp may be kept in service for no more than (5) five days. In such cases alternative transportation will be provided to individuals with disabilities who are unable to use the vehicle because its lift/ramp does not work.

## **II. ADA PARATRANSIT ELIGIBILITY DETERMINATION, APPLICATION AND APPEALS PROCESS**

### **A. Eligibility Criteria**

All individuals determined to be ADA paratransit eligible have a civil right to obtain the levels of service and associated provisions of the ADA paratransit service as outlined previously.

Per the ADA, paratransit eligibility is functionally based and not determined by the type of disability or mobility aid used. A person's eligibility can be decided on a trip-by-trip basis, which is determined by specific conditions in conjunction with the disability (weather, distance, passenger amenities available, etc.). Consequently, a person can be determined to be unconditionally eligible, conditionally eligible, temporarily eligible or ineligible for paratransit services.

Eligibility as defined by the ADA is as follows:

- Persons who have a specific impairment-related condition that prevents them from getting to or from a fixed route stop.
- Persons who cannot use the fixed route service because the route(s) needed for a particular trip is/are not accessible.
  - All **Northwoods Transit Connections** vehicles are lift equipped and therefore all routes are accessible.
- Persons, who, because of a disability, are unable to independently board, ride or disembark from an accessible fixed route vehicle.

Disabilities can be permanent as well as temporary and must be considered accordingly.

Contact **Northwoods Transit Connections** for an application for ADA Complementary Paratransit service at (715)420-0585.



## B. Application Process

Public entities that provide complementary ADA paratransit service also need to establish a process for determining who is eligible to receive the service. Per the ADA, documentation of eligibility and associated conditions of eligibility if applicable must be provided to persons deemed eligible. An appeals process must also be made available for persons who are determined ineligible or only eligible under certain conditions. A separation of authority must be maintained between the individual making the initial determination and those individuals deciding the appeal.

Applications for **Northwoods Transit Connections** ADA eligibility for complementary paratransit service are available at the **Northwoods Transit Connections'** office, 3611 Highway 4, Rhinelander, WI 54501. Applicants may request an application be sent via mail by calling the **Northwoods Transit Connections'** office at (715)420-0585.

An application must be completed before an individual is allowed to use the **Northwoods Transit Connections'** complementary ADA paratransit service. The application must be filled out by the applicant or someone on the applicant's behalf.

Once the completed application is received **Northwoods Transit Connections** staff will review the application using the ADA eligibility standards described in 49 CFR Part 37.123 and 49 CFR Part 37.125. **Northwoods Transit Connections** will notify the applicant within **21 calendar days** of their eligibility status. The applicant will receive a letter verifying whether they are eligible for service or not, and if so, what type of eligibility, and for how long. The letter will be sent in the format requested in the application. If the eligibility is limited or denied, **Northwoods Transit Connections** will state specifically the reason for the limitation or denial. For a visually impaired customer, a phone call will be made in addition to the letter. If a determination has not been made within **21 calendar days** of receiving the completed application, the applicant will be treated as eligible and will be provided service until **Northwoods Transit Connections** determines their eligibility.

### Types of Eligibility

Transit agencies generally grant unconditional or conditional eligibility and may apply temporary eligibility to either type.

- ✓ **Unconditional eligibility** sometimes called 'unrestricted eligibility' or 'all-trip eligibility' means that an individual is unable to use fixed route transit services under any circumstances and thus is eligible to make all trips using complementary paratransit (e.g., individual who cannot travel independently due to profound intellectual disabilities or advanced dementia).
- ✓ **Conditional eligibility** sometimes called 'restricted eligibility' or 'some-trip eligibility' means an individual meets the eligibility criteria with respect to some trips but not others (e.g., ride has severe fatigue after a treatment, environmental conditions such as snow/ice, etc.)
- ✓ **Temporary eligibility** applies to individuals who experience a temporary loss of functional ability that prevents them from using fixed route service (e.g., fatigue from two months of treatment, recovery from a stroke, etc.).

### Eligibility Expiration/Reapplication

**Northwoods Transit Connections** can request any or all customers to reapply at any time based on health conditions or after legal or policy changes, among other reasons, but must give a 90-day minimum notice of expiration in writing. These requests cannot be arbitrary or capricious, discriminatory, or unreasonably frequent.

## C. Appeals Process

### Requesting an Appeal

Individuals found not eligible for **Northwoods Transit Connections** paratransit service or eligible but with specified conditions, and customers whose service is suspended, may request an internal administrative appeal of those decisions. See section titled *Appeals Process* for more information.

## III. PASSENGER RESPONSIBILITIES

### General Passenger Condition

All passengers must be able to sit in a vehicle seat or wheelchair in order to be transported.

Any passenger whose medical condition is such that the passenger is incoherent or requires immediate medical attention to sustain life may be denied service. Complementary paratransit service is to be considered a “common carrier” and does not perform ambulance or emergency service.

### Rules of Conduct

The rules of conduct will assist in the safety and comfort of the riders and operator. Riders who violate rules of conduct are subject to penalties, up to and including suspension of service.

Riders must:

- ✓ Wear a seat belt.
- ✓ Keep their wheelchair or mobility device fastened while the vehicle is in operation.
- ✓ Follow personal hygiene measures that do not result in a public health hazard.
- ✓ No eating, drinking, or smoking on board.
- ✓ No abusive, threatening, or obscene language or actions or intent to act on board or while requesting the service.
- ✓ No physical abuse of another rider or the vehicle operator.
- ✓ No operating or tampering with any equipment while on board.
- ✓ No weapons are allowed of any kind (*except those allowed by state law*).

If the driver reasonably believes a passenger’s physical condition or conduct is hazardous, or if a passenger possesses weapons, instruments or equipment that are reasonably believed to be dangerous, service may be terminated immediately. See *Rules of Conduct Policy* for more information.

### Requesting Service

#### Trip Reservation

ADA requires that next day service be provided. Telephone reservation requests are accepted 24-hours in advance Monday-Friday between 8:00am and 4:00pm.

Passengers can schedule service by calling the **Northwoods Transit Connections** at (715)420-0585 or for people who are deaf, hard-of-hearing, deaf-blind, and speech disabled please use Wisconsin Relay 711 service <https://wisconsinrelay.com>.

**Northwoods Transit Connections** has no limitation on the number of trips per day or trips per person.

Passengers should provide the following information:

1. Name
2. Phone Number
3. Pickup Address
4. Destination Address
5. Desired Pickup Time
6. Desired Drop-Off Time (Appointment Time)
7. Number of Passengers (including a Personal Care Attendant (PCA) or companion)
8. If a Mobility Device will be used

### **Negotiating a Pickup Time**

**Northwoods Transit Connections** may negotiate pickup times with an individual however **Northwoods Transit Connections** may not require an ADA paratransit eligible individual to schedule a trip to begin more than **one (1) hour** before or after the individual's desired departure time.

The pickup time window is defined as **30 minutes** before the scheduled pickup time, to **30 minutes** after the scheduled pickup time. Riders must be ready to board the vehicle within the pickup time window. The driver will wait for a maximum of **five (5) minutes** within the pickup time window for the rider.

If the bus will be more than **30 minutes** late for a scheduled pickup time, **Northwoods Transit Connections** will make every effort to let the customer know.

### **Subscription Service**

**Northwoods Transit Connections** allows subscription service as part of the **Northwoods Transit Connections**. Subscription service may not absorb more than fifty percent (50%) of the number of trips available at a given time of day, unless there is non-subscription capacity.

### **Reasonable Modifications**

If a passenger with a disability requires modification of any **Northwoods Transit Connections'** policies and practices to accommodate their disability to use the service, the passenger may request such a modification.

**Northwoods Transit Connections** will work with the individual to find an acceptable accommodation solution. **Northwoods Transit Connections** will consider all such requests unless the request would create a direct threat to the health or safety of others, including passengers; the individual making the request is otherwise able to fully use the service without the modification; or making the modification would create an undue financial or administrative burden.

See **Northwoods Transit Connections'** *Reasonable Modification Policy* attached.

### **Trip Denials**

**Northwoods Transit Connections** records *all* trip requests, regardless of whether the trip is denied.

Trip denials result when agencies do not accept trip requests. Avoiding denials means properly planning service, allocating resources, and managing operations to meet 100 percent of expected demand.

Examples of trip denials include:

- A rider requests a next-day trip, and the transit agency says it cannot provide that trip.
- A rider requests a next-day trip, and the transit agency can only offer a trip that is outside of the 1 hour negotiating window. This represents a denial regardless of whether the rider accepts such an offer.
- A rider requests a round-trip and the agency can only provide one leg of the trip. If the rider does not take the offered one-way trip, both portions of the trip are denials.

To ensure a pattern or practice of a substantial number of trip denials is not occurring, **Northwoods Transit Connections** uses a **Trip Denial Log** to document and analyze all trip denials, including such details as the rider's identification, date of request, date and time of requested trip(s), origin and destination, and reason for denial.

Every attempt will be made to avoid trip denials.

### **Cancellations**

All cancellations require a **1-hour** notification prior to the scheduled pickup time.

A late cancellation is defined as either:

- 1) A cancellation made less than **1 hour** before the scheduled pickup time or
- 2) As a cancellation made at the door or a refusal to board a vehicle that has arrived within the pick-up time window.

Riders should telephone the **Northwoods Transit Connections** office as soon as possible once it is determined that the rider no longer requires the scheduled pickup. If no one is available to take the call the rider may leave a voice message indicating the date and times of rides being cancelled or call back at a later time to speak directly with **Northwoods Transit Connections** staff.

### **No Shows**

A no-show occurs when the **Northwoods Transit Connections** arrives at the pickup location on time and the driver waits at least **(5) five** minutes after the negotiated pickup time, but the rider fails to appear.

The driver will wait until the negotiated pickup time to begin a 5-minute countdown and to wait until the full (5) five minutes have elapsed before departing without the rider. For example, when the negotiated pickup time is 11:00am and the vehicle arrives at 10:55am, the driver will wait for the rider at least until 11:05am before departing.

No-shows due to **Northwoods Transit Connections** staff error or circumstances beyond a rider's control do not count as a no-show or late cancellation.

See copy of **No Show Policy** attached.

## Riding Complementary ADA Paratransit Service

### Pickup Time Window

The pickup time window is defined as **30 minutes** before the scheduled pickup time, to **30 minutes** after the scheduled pickup time. Riders must be ready to board the vehicle within the pickup time window. The driver will wait for a maximum of **five (5) minutes** within the pickup time window for the rider.

If the bus will be more than **30 minutes** late for a scheduled pickup time, **Northwoods Transit Connections** will make every effort to let the customer know.

### Driver Assistance

Drivers will be properly trained in the use of accessibility equipment as well as sensitivity to people with disabilities.

Drivers will make themselves available to assist individuals with disabilities and will assist upon request of the passenger. **Northwoods Transit Connections'** paratransit services are considered curb-to curb. Drivers will assist the passenger using the vehicle ramp, lift, and/or securement systems using the accessibility.

The staff of **Northwoods Transit Connections** will not lift a passenger, leave a vehicle unattended, or out of visual observation for a lengthy period of time, enter a rider's home, care for service animals, operate a power chair, provide personal care attendant (PCA) service, or take actions that would clearly be unsafe.

If more extensive assistance is needed by the individual than the **Northwoods Transit Connections** can provide as provider or transportation, the individual will be responsible for arranging personal assistance. **Northwoods Transit Connections** will work with the individual and/or caregiver/social worker to clarify parameters of the assistance that can be provided by **Northwoods Transit Connections**.

Drivers are not permitted to do the following:

- ✓ Maneuver a wheelchair up or down any steps. This rule is provided for the safety of the passenger and the driver.
- ✓ Deny an individual transportation because a vehicle's securement system is unable to secure the mobility device.
- ✓ Provide a level of assistance that constitutes a direct threat to the health or safety of the driver.

### Safety Tips

- Be sure the driver is ready to assist you before approaching the lift or ramp.
- Follow the instructions given by the driver.
- If you use a wheelchair, make sure it is properly tied down and the brakes are on.
- If you use a power wheelchair, turn off the power after it has been secured.
- Always wear your seatbelt.

### Accommodations of Wheelchairs

All wheelchairs are required to be secured within the securement system to ensure that the wheelchair remains secured. However, **Northwoods Transit Connections** will not deny transportation to a wheelchair or its user on the ground that the device cannot be secured or restrained satisfactorily by the vehicle securement system.

Individuals using wheelchairs/mobility devices shall be transported in **Northwoods Transit Connections** vehicles if their wheelchair/mobility device meets the following criteria:

- Device must meet the definition in FTA 49 CFR 37.3: “A mobility aid belonging to any class of three or more-wheeled devices, usable indoors, designed or modified for and used by individuals with mobility impairments, whether operated manually or powered.
- The wheelchair/mobility device and occupant combined weight does not exceed that of the lift specifications and the carriage of the wheelchair is demonstrated to be consistent with legitimate safety requirements.
- **Northwoods Transit Connections** does not permit riders who use wheelchairs to ride in places other than designated securement locations in the vehicle, proper wheelchair securement procedures must be used.
- The wheelchair/mobility device width must be compatible so as to fit on the ramp and within the securement area.

Vehicle ramps/lifts and kneelers are inspected daily. Regular preventative maintenance is performed on the ramp/lift on a scheduled basis. Vehicle Operators are instructed to report defects/failures in the ramp/lift immediately to dispatch.

**Northwoods Transit Connections** staff will promptly remove the vehicle with the malfunctioning ramp from service. Repairs to the ramp/lift are made promptly. The vehicle will not be returned to service until the ramp/lift has been repaired.

At any time, if an accessibility feature on a **Northwoods Transit Connections** vehicle is inoperable **Northwoods Transit Connections** will take reasonable steps to accommodate individuals with disabilities who rely on these features.

Persons with mobility disabilities may use devices other than wheelchairs to assist with locomotion such as canes, walkers, crutches etc. The devices will be accommodated on the same basis as wheelchairs.

### **Ramp/Lift and Securement Use**

Drivers are instructed to deploy the ramp/lift when operating vehicles to provide accessibility for all riders. Drivers shall not refuse to permit a passenger who uses a lift/ramp to disembark from a vehicle at any designated stop, unless the lift cannot be deployed, the lift will be damaged if it is deployed, or temporary conditions at the stop, not under the control of the entity, preclude the safe use of the stop by all passengers.

### **Personal Care Attendant (PCA)**

Personal Care Attendants (PCA's) can travel with eligible clients for free but must have the same origin/destination. Companions/guests can travel with an eligible client for the same amount charged to the ADA eligible rider. Arrangements for additional companions should be made at the time of the reservation. **Northwoods Transit Connections** does not provide PCAs.

## **MISCELLANEOUS**

### **Visitor Policy**

Visitors to the area must be provided 21 days of service (in a 365-day period) when they provide documentation of ADA paratransit eligibility from another area. If a person is traveling from an area that does not have paratransit services, they can be requested to provide documentation of their disability. If more than 21 days of service is needed, visitors can be required to go through the local eligibility process.

## **Medical Equipment**

**Northwoods Transit Connections** shall not prohibit an individual with a disability from traveling with a respirator or portable oxygen supply. **Northwoods Transit Connections** allows riders to use the concentrators as needed while aboard the vehicle.

## **Service Animals and Accommodations of Animals**

Under the Americans with Disabilities Act (ADA) of 1990, a *service animal* means 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 impaired vision, alerting individuals with impaired hearing to intruders or sounds, providing minimal protection or rescue work, pulling a wheelchair, or fetching dropped items.

As such, it is the policy of the **Northwoods Transit Connections** to allow *service animals* to accompany their owner without restraint.

**Northwoods Transit Connections** cannot require riders to provide documentation for their service animal before boarding a vehicle or entering a facility, but personnel may ask riders two questions: (1) is the animal a service animal required because of a disability? and (2) what work or task has the animal been trained to perform?

The ADA allows for the imposition of legitimate safety requirements that are necessary for the safe operation of paratransit service. The **Northwoods Transit Connections** may require use of a secured pet travel carrier for any animal that is a health or safety hazard regardless of the kind of training it has received and what function it serves for its owner.

## **Carry-on Packages**

Drivers will help passengers take lightweight items off the vehicle and carry them to the door of the trip destination. If additional assistance is required, this assistance may be rendered on a case-by-case basis. To ensure timely service, passengers are encouraged only to bring what they can carry on their own or with the assistance of a PCA.

## **Inclement Weather**

In the unlikely event of service cancellation due to inclement weather or other emergency, **Northwoods Transit Connections** personnel shall attempt to contact all scheduled passengers.

## **Lost and Found**

The **Northwoods Transit Connections** will not be responsible for items left on vehicles. However, if found, the item(s) will be held for 30 calendar days. If the item is not claimed within 30 calendar days, it may be donated to a local charitable organization.

Passengers attempting to locate lost items should contact **Northwoods Transit Connections**. If the passenger's item has been located, every effort will be made to return the item to the passenger on their next scheduled trip.

## IV. COMPLAINT PROCESS

### How to File a Complaint

**Oneida Vilas Transit Commission** as a recipient of federal financial assistance must develop a procedure for investigating, tracking, and resolving Title VI/ADA Nondiscrimination complaints regarding its public transportation service provided by **Northwoods Transit Connections**.

For information on **Northwoods Transit Connections'** civil rights program, ADA obligations, and the procedures to file a complaint, contact Barb Newman, (715)420-0585, [barb.newmannorthwoodstransit@outlook.com](mailto:barb.newmannorthwoodstransit@outlook.com).

For people who are deaf, hard-of-hearing, deaf-blind, and speech disabled please use Wisconsin Relay 711 service <https://wisconsinrelay.com>.



# Attachments

- **Rules of Conduct Policy**
- **Reasonable Modification Policy**
- **No-Show Policy**
- **Complaint Form**
- **Appeals Process**
- **Trip Denial Log**
- **Paratransit Application – see website.**

# Northwoods Transit Connections

## Rules of Conduct Policy

### Rules of Conduct

The rules of conduct will assist in the safety and comfort of the riders and operator. Riders who violate rules of conduct are subject to penalties, up to and including suspension of service.

Riders must:

- ✓ Wear a seat belt.
- ✓ Keep their wheelchair or mobility device fastened while the vehicle is in operation.
- ✓ Follow personal hygiene measures that do not result in a public health hazard.
- ✓ No eating, drinking, or smoking on board.
- ✓ No abusive, threatening, or obscene language or actions or intent to act on board or while requesting the service.
- ✓ No physical abuse of another rider or the vehicle operator.
- ✓ No operating or tampering with any equipment while on board.
- ✓ No weapons are allowed of any kind (*except those allowed by state law*).

If the driver reasonably believes a passenger's physical condition or conduct is hazardous, or if a passenger possesses weapons, instruments or equipment that are reasonably believed to be dangerous, service may be terminated immediately.

### Suspension of Service due to Prohibited Conduct

Any violation of a rule of conduct listed above may result in an immediate **7-day** suspension from service. After the suspension has begun **Northwoods Transit Connections** administrative staff will review the circumstances. Upon review, the suspension can either be lifted, extended, or continued indefinitely.

Payment of fare is required. Non-payment of the fare will result in a suspension until the required payment is made.

**Northwoods Transit Connections** riders have the right to an administrative appeal if they do not agree with a decision to suspend service for No Shows, Disruptive Conduct, or Reasonable Modification.

See **Northwoods Transit Connections'** *Appeals Process* for more information.

# Northwoods Transit Connections

## Reasonable Modification Policy

### Purpose

The purpose of the reasonable modification policy is to ensure that **Northwoods Transit Connections** offers equitable and effective opportunities and access to public transportation services for persons with disabilities and full compliance with the provisions of Title II of the Americans with Disabilities Act of 1990 and Section 504 of the Rehabilitation Act of 1973.

### Policy

**Northwoods Transit Connections** is committed to providing equitable access and opportunity to individuals with disabilities in all programs, services, and activities. **Northwoods Transit Connections** recognizes that in order to have equitable and effective opportunities and benefits, individuals with disabilities may need reasonable modification to policies, practices, and procedures. **Northwoods Transit Connections** will adhere to all applicable federal and state laws, regulations, and guidelines with respect to providing reasonable modifications, as necessary, to afford equal access to programs for persons with disabilities. **Northwoods Transit Connections** does not discriminate based on disability in admission to, participation in, or receipt of services and benefits under any transit program or activity. **Northwoods Transit Connections** will take appropriate steps to ensure that persons with disabilities have an equal opportunity to participate.

No individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of **Northwoods Transit Connections**, or be subject to discrimination by **Northwoods Transit Connections**.

### Eligibility Criteria

An individual is eligible to request a reasonable modification consideration if that individual experiences a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such impairment; or been regarded as having such impairment<sup>2</sup>.

### Reasonable Modification

A reasonable modification is a change or exception to a policy, practice, or procedure that allows individuals with disabilities to have equitable access to programs, services, and activities. **Northwoods Transit Connections** will make reasonable modifications to policies, practices, and procedures when necessary to ensure access to transit services for individuals with disabilities, unless:

- Making the modification would fundamentally alter the nature of the public transportation service.
- Making the modification would create a direct threat to the health or safety of others including passengers.
- The individual with a disability is able to fully use the transportation service without the modification.

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<sup>2</sup> Americans with Disabilities Act, Title 42, Chapter 126, Section 12102

- Making the modification would create an undue financial or administrative burden.

For the purposes of this section, the term reasonable modification shall be interpreted in a manner consistent with the term “reasonable accommodations” as set forth in the Americans with Disabilities Act title II regulations at 28 CFR 35.130(b)(7), and not as it is defined or interpreted for the purposes of employment discrimination under title I of the ADA (42 U.S.C. 12111–12112) and its implementing regulations at 29 CFR part 1630.

### **Requests for Reasonable Modification**

**Northwoods Transit Connections** shall make information about how to contact **Northwoods Transit Connections** to make requests for reasonable modification readily available to the public.

**Northwoods Transit Connections** shall follow these procedures in taking requests:

- Individuals (or their representatives) requesting modifications shall describe what they need in order to use the service.
- Individuals requesting modifications are not required to use the term “reasonable accommodation or reasonable modification” when making a request. **Northwoods Transit Connections** will determine if the request represents a reasonable modification and proceed in considering the request according to ADA guidelines and this policy.
- Whenever feasible, **Northwoods Transit Connections** requests that individuals make such requests for reasonable modification in advance if possible, to allow time to consider the request and, if approved, to make the appropriate modification to affected policies, practices, and/or procedures.
- Where a request for modification cannot practicably be made and determined in advance, **Northwoods Transit Connections** personnel shall make a determination of whether the modification can be made at the time of the request. Operating personnel should consult with **Northwoods Transit Connections’** management before making a determination to grant or deny the request.

Requests for accommodation may be made either orally or in writing. The reasonable modification process begins as soon as the request is received.

Reasonable modification request forms are by contacting **Northwoods Transit Connections** by phone or email. The request can be submitted in any written format. Alternative means of filing a request, such as personal interviews, phone calls, or taped requests, will be made available for persons with disabilities if unable to communicate their request in writing or in advance.

### **Interactive Process**

When a request for modification is made, **Northwoods Transit Connections** and the individual requesting the modification must engage in a good faith interactive process to determine what, if any modification shall be provided. The individual and **Northwoods Transit Connections** must communicate with each other about the request and the process for determining whether a modification will be made. Communication is a priority throughout the entire process.

### **Time Frame for Processing Requests and Providing Reasonable Modification**

**Northwoods Transit Connections** will process requests for reasonable modification and then provide the modification, where appropriate, within **(30) thirty business days**. **Northwoods Transit Connections** recognizes, however, that the time necessary to process a request will depend on the

nature of the modification(s) requested and whether it is necessary to obtain supporting information.

### **Granting a Reasonable Modification Request**

As soon as **Northwoods Transit Connections** determines that a reasonable modification will be provided, that decision shall immediately be communicated to the individual. This notice will be in writing in order to maintain the required record for reporting purposes. However, upon request, alternative means of response will be provided.

In choosing among alternatives for meeting nondiscrimination and accessibility requirements with respect to new, altered, or existing facilities, or designated or specified transportation services, **Northwoods Transit Connections** shall give priority to those methods that offer services, programs, and activities to individuals with disabilities in the most integrated setting appropriate to the needs of individuals with disabilities.

### **Denying a Reasonable Modification Request**

As soon as **Northwoods Transit Connections** determines that a request for reasonable modification will be denied, **Northwoods Transit Connections** will communicate the basis for the decision in writing to the individual requesting the modification. When requested, alternative means of response also will be provided. The explanation for the denial will clearly state:

- a. the specific reasons for the denial;
- b. any alternative modification that may create the same access to transit services as requested by the individual; and
- c. the opportunity to file an appeal relative to the **Northwoods Transit Connections'** decision on the request.

### **Appeal Process**

**Northwoods Transit Connections** will follow its existing procedure for investigating and tracking complaints/appeals. Alternative means of filing an appeal, such as personal interviews, phone calls, or taped requests, will be made available for persons with disabilities if unable to communicate their request in writing or in advance.

### **Designated Employee**

**Northwoods Transit Connections** shall designate one official within the organization responsible for processing reasonable modification requests and handling appeals. This individual is:

Barb Newman, Transit Manager

**Address:** 3611 Highway 47, P.O. Box 853, Rhinelander, WI 54501

**Phone:** (715)420-0585

**Email:** [barb.newmannorthwoodstransit@outlook.com](mailto:barb.newmannorthwoodstransit@outlook.com)

### **Record Retention**

**Northwoods Transit Connections** will maintain all records related to reasonable modification requests and denials for at least three (3) years.

## Request for Reasonable Modification Form

<b>Date:</b>	
<b>Submitted by:</b>	
<b>Cell Phone:</b>	
<b>Email:</b>	

Submitted on behalf of: (please specify)

	<b>Myself</b>	
	<b>Someone else (<i>insert name of rider</i>)</b>	

### Contact Information of Rider

<b>Address</b>	
<b>Phone</b>	
<b>Email</b>	

<b>Please describe what modification the rider needs to use the transportation service: (if additional space is needed, please use the back of the form).</b>

Does the person needing modification currently ride Northwoods Transit Connections?

Yes  No

<b>If yes, please describe the current riding experiences without this requested modification.</b>

Submit this form to:

- 1) **Attention:** Northwoods Transit Connections
- 2) **Mail:** 3611 Highway 47, P.O. Box 853, Rhinelander, WI 54501
- 3) **Email:** [barb.newmannorthwoodstransit@outlook.com](mailto:barb.newmannorthwoodstransit@outlook.com)

## Request for Reasonable Modification Form (continued)

**Northwoods Transit Connections** will process requests for reasonable accommodation and then provide the modification, where appropriate, within thirty (30) business days.

**Northwoods Transit Connections** will communicate directly with the person requesting the modification.

**Northwoods Transit Connections** recognizes, however, that the time necessary to process a request will depend on the nature of the modification(s) requested and whether it is necessary to obtain supporting information. If the modification is denied, an appeal process is in place.

### Official Use Only

	Date Received:	
	Request Number:	
Notes:		
Approved/Denied: (Specify)		
Official Name:		
Date:		

# No-Show Policy

## Northwoods Transit Connections Instructions

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FTA recommends that a transit agency's no-show policy include, at a minimum:

- General policy statement
- Definition of no-shows
- Description of minimum driver wait times within pickup windows.
- Definition of late cancellations and how to cancel trips.
- Examples of no-shows and late cancellations beyond a rider's control and how riders should communicate such instances.
- Statement that no-shows due to transit agency errors do not count.
- Statement that subsequent trips after a no-show will not be automatically cancelled, and that passengers need to cancel any trips they do not intend to take.
- The transit agency's process to notify riders of recorded no-shows or late cancellations.
- What constitutes a pattern and practice of excessive no-shows.
- Time periods of potential service suspensions.
- Instructions for appealing proposed suspensions.

### General Policy Statement on No-Shows

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**Northwoods Transit Connections** understands that because some trips are allowed to be scheduled in advance, riders may sometimes miss scheduled rides or forget to cancel rides they no longer need.

**Northwoods Transit Connections** also understands that riders may sometimes miss scheduled trips or be unable to cancel trips in a timely way for reasons that are beyond their control. However, repeatedly missing scheduled trips (or failing to cancel trips in a timely way) can lead to suspension of service. The following information explains **Northwoods Transit Connections'** no-show policy.

### Definitions: No-Show, Pickup Window, and Late Cancellation

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#### **No-show**

A no-show occurs when a rider fails to appear to board the vehicle for a scheduled trip. This presumes the vehicle arrives at the scheduled pickup location within the pickup window and the driver waits at least **five (5)** minutes.

#### **Pickup Window**

The pickup window is defined as **30 minutes before the scheduled pickup time to 30 minutes after the scheduled pickup time**. Riders must be ready to board a vehicle that arrives within the pickup window. The driver will wait for a maximum of **five (5)** minutes within the pickup window for the rider to appear.

#### **Late Cancellation**

A late cancellation is defined as either a cancellation made less than **1 hour** before the scheduled pickup time or as a cancellation made at the door or a refusal to board a vehicle that has arrived within the pickup window.



### Definition: No-Shows Due to Operator Error or to Circumstances Beyond a Rider's Control<sup>3</sup>

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**Northwoods Transit Connections** does not count as no-shows (or late cancellations) any missed trips due to our error, such as:

- Trips placed on the schedule in error.
- Pickups scheduled at the wrong pickup location.
- Drivers arriving and departing before the pickup window begins.
- Drivers arriving late (after the end of the pickup window)
- Drivers arriving within the pickup window but departing without waiting the required **five [5] minutes**.

**Northwoods Transit Connections** does not count as no-shows or late cancellations situations beyond a rider's control that prevent the rider from notifying us that the trip cannot be taken, such as:

- Medical emergency
- Family emergency
- Sudden illness or change in condition.
- Appointment that runs unexpectedly late without sufficient notice

Riders should contact **Northwoods Transit Connections** staff when experiencing no-shows or late cancellations due to circumstances beyond their control.

### Policy for Handling Subsequent Trips Following No-shows and Late Cancellations

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When a rider is a no-show for one trip, all subsequent trips on that day remain on the schedule unless the rider specifically cancels the trips. To avoid multiple no-shows on the same day, riders are strongly encouraged to cancel any subsequent trips they no longer need that day.

### Suspension Policies for a Pattern or Practice of Excessive No-shows and Late Cancellations

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**Northwoods Transit Connections** reviews all recorded no-shows to ensure accuracy before recording them in a rider's account. **Northwoods Transit Connections** reserves the right to suspend from services any rider who establish a pattern or practice of missing scheduled trips.

Each verified No-Show consistent with the above definitions counts as **(1) penalty point**. Riders will be subject to suspension after meeting all the following conditions:

- Accumulate **(3)** penalty points in one calendar month
- Have booked at least **(3)** three trips that month
- Have "no-showed" or "late cancelled" at least (10%) percent of those trips.

A rider will be subject to suspension only if both the minimum number of trips booked and the minimum number of penalty points are reached during the calendar month.

**Northwoods Transit Connections** will attempt to notify riders by telephone after they have accumulated **(2) penalty points** and would be subject to suspension should they have verified “no shows” of 10% of total booked trips.

All suspension notices include a copy of this policy, information on disputing no-shows and how to appeal suspensions.

Violations result in the following:

- 1<sup>st</sup> violation – Triggers attempting a warning phone call and written letter, but no suspension.
- 2<sup>nd</sup> violation – **7 calendar days** suspension
- 3<sup>rd</sup> violation – **14 calendar days** suspension
- 4<sup>th</sup> violation – **21 calendar days** suspension
- 5<sup>th</sup> and subsequent violations – **28 calendar days** suspension

Note: Suspension schedule cannot exceed 30 calendar days.

A record of no-show violations will be kept for only a six-month period. This ensures that someone with a no-show problem in January, will not be unduly punished in August unless a problem exists.

#### Policy for Disputing Specific No-Shows or Late Cancellations

Riders wishing to dispute specific no-shows or late cancellations must do so within **(7) business days** of receiving suspension letters. Riders should contact Northwoods Transit Connections to explain the circumstance and request the removal of the no-show or late cancellation.

#### Policy for Appealing Proposed Suspensions

Riders wishing to appeal suspensions under this policy have the right to file an appeal request in-person, via phone, email, or US mail within **(10) business days** of receiving suspension letters. Riders who miss the appeal request deadline will be suspended from **Northwoods Transit Connections** on the date listed on the suspension notice.

All suspension appeals follow **Northwoods Transit Connections** appeal policy.

# Complaint/Comment Form

**Northwoods Transit Connections** wants your feedback. Please use this form for suggestions, compliments, and complaints. Submit this form electronically at [barb.newmannorthwoodstransit@outlook.com](mailto:barb.newmannorthwoodstransit@outlook.com) or in person at the address below.

## Northwoods Transit Connections

3611 Highway 47  
P.O. Box 853  
Rhineland, WI 54501

You may also call us at (715)420-0585. Please make sure to provide your contact information in order to receive a response.

### Section A: Accessible Format Requirements

Please check the preferred format for this document

<input type="checkbox"/> Large Print	<input type="checkbox"/> TDD or Relay	<input type="checkbox"/> Audio Recording	<input type="checkbox"/> Other (if selected please state what type of format you need in the box below)
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Click or tap here to enter text.

### Section B: Contact Information

Name <input type="text"/>	Telephone Number (including area code) <input type="text"/>
Address <input type="text"/>	City <input type="text"/>
State <input type="text"/>	Zip Code <input type="text"/>

Email Address

Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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If no, please provide the name and relationship of the person for whom you are complaining and why you are completing the form on their behalf in the box below.

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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### Section C: Type of Comment

What type of comment are you providing? Please check which category best applies.

<input type="checkbox"/> Complaint	<input type="checkbox"/> Suggestion	<input type="checkbox"/> Compliment	<input type="checkbox"/> Other
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Which of the following describes the nature of the comment? Please check one or more of the check boxes.

<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> Religion
<input type="checkbox"/> Age	<input type="checkbox"/> Sex	<input type="checkbox"/> Service	<input type="checkbox"/> Income Status
<input type="checkbox"/> Limited English Proficient (L.E.P)		<input type="checkbox"/> Americans with Disability Act (A.D.A)	

### Section D: Comment Details

Please answer the questions below regarding your comment

Did the incident occur on the following type of service? <i>Please check any box that may apply.</i>	<input type="checkbox"/> Paratransit	<input type="checkbox"/> Shared Ride Taxi	<input type="checkbox"/> Bus
What was the date of the occurrence?	Click to add date in the following format: Day, month, year		
What was the time of the occurrence?	Click to add the time		
What is the name or identification of the employee or employees involved?	Click or tap here to enter text.		
What is the name or identification of others involved, if applicable?	Click or tap here to enter text.		
What was the number or name of the route you were on, if applicable?	Click or tap here to enter text.		
What was the direction or destination you were headed to when the incident occurred, if applicable?	Click or tap here to enter text.		
Where was the location of the occurrence?	Click or tap here to enter text.		
Was the use of a mobility aid involved in the incident?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Please add any additional descriptive details about the incident.	Click or tap here to enter text.		

In the box below, please explain as clearly as possible what happened and why you believe you were discriminated against.

Click or tap here to enter text.

### Section E: Follow-up

May we contact you if we need more details or information?

Yes

No

If yes, how would you best liked to be reached? Please select your preferred form of contact below

Phone

Email

Mail

If you would prefer to be contacted by phone, please list the best day and time to reach you.

Click here to add your preferred time

Click here to add your preferred day

### Section F: Desired Outcome

Please list below, what steps you would like taken to address the conflict or problem.

Click or tap here to enter text.

If applicable, please list below all additional agencies you have filed this complaint with such as Federal, State, Local agencies, or with any Federal or State Court. Please include the contact information to where the complaint was sent.

Click or tap here to enter text.

### Section G: Signature

Please attach any documents you have which support the allegation. Then date and sign this form and send it to Northwoods Transit Connections.

Name

Date:  Click to add date in the following format: Day, month, year

Signature

## List of Complaints, Investigations and Lawsuits<sup>4</sup>

**Northwoods Transit Connections** maintains a log to track and resolve transit related complaints, investigations, and lawsuits.

**Check One:**

Since the last update of this *ADA Complementary Paratransit Plan*, there has been no transportation related civil rights investigations, complaints, or lawsuits filed with the \_\_\_\_\_ **Northwoods Transit Connections**.

There have been investigations, complaints and/or lawsuits filed against us. *See list below.*  
 \_\_\_\_\_ *Attach additional information as needed.*

**Note:** The performance measure for tracking when an investigation begins and when its administratively closed is documented in the **Complaint Log** table below. **Northwoods Transit Connections** will strive to complete the investigation within the timeframe specified in its **Complaint Procedure**.

Type Complaint Investigation Lawsuit	Date (Month, Day, Year)	Complainant's Name/Address/ Phone/Email	Basis of Complaint <sup>5</sup>	Summary Complaint Description	Status	Action Taken/ Final Outcome if Resolved  List dates of action steps including the dates complaint/ investigation begins and is administratively closed.

<sup>4</sup> **Lawsuit:** The protected class under Title II is disability. The protected classes under Title VI are Race, Color and Nation Origin.

<sup>5</sup> **Basis of Complaint:** Specify Race, Color, National Origin, Disability, Religion, Sex, Age, Service, Income Status, Limited English Proficient (LEP), Safety, Other

# Sample – Acknowledge Receipt Letter

## Letter/Email Acknowledging Receipt of Complaint

Date

Ms. Jan Doe  
1234 Main St.  
XXXX, WI 53531

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the **Northwoods Transit Connections** alleging \_\_\_\_\_.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by phone, (715)420-0585, email [barb.newmannorthwoodstransit@outlook.com](mailto:barb.newmannorthwoodstransit@outlook.com) or by mail at:

**Northwoods Transit Connections**  
3611 Highway 47  
P.O. Box 83  
Rhineland, WI 54501

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

**Transit Manager**  
**Northwoods Transit Connections**  
3611 Highway 47  
P.O. Box 83  
Rhineland, WI 54501

# Sample - Closure Letter

## Notifying Complainant that the complaint is not substantiated

Date

Ms. Jan Doe  
1234 Main St.  
XXXX , WI 53531

Dear Ms. Doe:

The matter referenced in your complaint of \_\_\_\_\_ (date) against the **Northwoods Transit Connections** alleging \_\_\_\_\_ has been investigated.

The results of the investigation did not indicate that the provisions of the Americans with Disabilities Act (ADA) was violated. As you know, ADA prohibits discrimination in any program receiving federal financial assistance.

**Northwoods Transit Connections** has analyzed the materials and facts pertaining to your case for evidence of the city's failure to comply with any of the ADA laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not be substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within 10 business days of receipt of this final written decision from the **Northwoods Transit Connections**, and/or 2) file a complaint externally with the Federal Transit Administration at:

Federal Transit Administration, Region V  
Office of Civil Rights  
Attention: Title VI Program Coordinator  
200 West Adams Street, Suite 320  
Chicago, Il 60606

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

**Northwoods Transit Connections**  
3611 Highway 47  
P.O. Box 83  
Rhineland, WI 54501



# Sample - Letter of Finding (LOF)

## Notifying Complainant the complaint is substantiated

Date

Ms. Jan Doe  
1234 Main St.  
XXXX, WI 53531

Dear Ms. Doe:

The matter referenced in your letter of \_\_\_\_\_ (date) against the **Northwoods Transit Connections** alleging an Americans with Disabilities Act (ADA) violation has been investigated.

(An/Several) apparent violations of the ADA, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. **(If a hearing is requested, the following sentence may be appropriate.)** You may be hearing from this office, or from state or federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

**Northwoods Transit Connections**  
3611 Highway 47  
P.O. Box 83  
Rhineland, WI 54501

## Northwoods Transit Connections

# Appeals Process

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**Northwoods Transit Connections** riders have the right to an administrative appeal if they do not agree with an eligibility determination or a decision to suspend service for No Shows/Late Cancellations or Disruptive Conduct.

This appeal process may also be used to appeal a reasonable modification determination or Civil Rights/Title VI complaint determination.

Appeals for service suspensions due to no show violations or disruptive conduct may be heard by **Northwoods Transit Connections** staff member(s) not involved in the suspension process. The decision of the independent **Northwoods Transit Connections** staff member(s) is final.

You may appeal in writing or in person. **You must submit the written Notice of Appeal form on the back of this page if you wish to file an appeal.**

If you have any questions related to your right to appeal, please contact Barb Newman, **Northwoods Transit Connections** Transit Manager at (715)420-0585, [barb.newmannorthwoodstransit@outlook.com](mailto:barb.newmannorthwoodstransit@outlook.com).

### **Eligibility Determination Appeals:**

If you are appealing an eligibility application denial, you must submit an appeal within **60 calendar days** of the application denial. If a decision is not made by **Northwoods Transit Connections** within **30 calendar days** of the completion of the appeal process, **Northwoods Transit Connections** must provide paratransit service from that time until and unless a decision to deny the appeal is issued.

### **No Show Appeals:**

If you are appealing a service suspension for violation of **Northwoods Transit Connections'** No Show/Late Cancellation Policy, service **will be** provided until an appeal hearing is concluded and a decision rendered.

### **Disruptive Conduct Appeals:**

If you are appealing a service suspension for violent, seriously disruptive, or illegal behavior, service **will NOT** be provided during the appeal process.

### **Reasonable Modifications Appeals:**

If you are appealing the decision made by the **Northwoods Transit Connections** regarding a reasonable modification request determination, service **will NOT** be provided during the appeal process.

### **Civil Rights/Title VI Complaint Appeals:**

If you are appealing the decision made by the **Northwoods Transit Connections** regarding a Civil Rights/Title VI investigation, a Complainant may use the form attached to appeal the civil rights determination.

## NOTICE OF APPEAL

If you wish to appeal your service suspension or civil rights determination, please complete this form, and return it as soon as possible. Appeals must be returned within **(10) business days<sup>6</sup>** of your notification of suspension and/or the civil rights determination.

Rider Information			
<b>Name:</b>		<b>Phone:</b>	
<b>ID#:</b>		<b>Email:</b>	
<b>Address:</b>			

Please check one of the following:

	<p><b>I wish to appeal in person.</b> Individuals choosing to appeal in person will be contacted by <b>Northwoods Transit Connections</b> to schedule the appeal hearing. Hearings may be conducted by teleconference at <b>Northwoods Transit Connections'</b> discretion.</p>
	<p><b>I wish to appeal in writing.</b> I understand the final decision on my appeal will be based solely on written materials in possession of <b>Northwoods Transit Connections</b> and those I am submitting with this form. (If you choose to appeal in writing, you must state specifically why you disagree with the suspension. You should provide supporting documentation.)</p>

Tell us why you are appealing: (attach additional pages and documentation, if needed)

**Signature/Date:** (this form will be returned if unsigned)

<b>Name:</b>		<b>Date:</b>	
<b>Signature:</b>			

Return this form and include any supporting documentation to:

**Northwoods Transit Connections**  
 3611 Highway 47  
 P.O. Box 83  
 Rhinelander, WI 54501  
[barb.newmannorthwoodstransit@outlook.com](mailto:barb.newmannorthwoodstransit@outlook.com)

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<sup>6</sup> Appeals related to application determination denial must be submitted to within **60 calendar days** of the application denial.

# Trip Denial Log

**Example Only** - This document is an example of the type of information **Northwoods Transit Connections** gathers to document and analyze trip denials to ensure a pattern or practice of a substantial number of trip denials is not



Date	Name	Rider ID #	Is the Rider Disabled? Yes/No	Limited English Proficient? Yes/No	Trip Request		Origin	Destination	Reason for Trip Denial	Wait List? Yes/No	Trip Request		Origin	Destination	Reason for Trip Denial	Wait List? Yes/No
					Day	Time					Day	Time				

## Notes: FTA C 4701.1

It is noted that **all** trip requests should be recorded, regardless of whether the trip is denied.

The purpose of this log is to track the characteristics of trip denials to help determine the underlying causes in order to take steps necessary to prevent future denials.

### Examples of Trip Denials:

Counting the number of trip denials means accounting for **all** trips that the rider is unable to take because of the denial.

1. A rider requests a next-day trip, and the transit agency says it cannot provide that trip.
2. A rider requests a next-day trip, and the transit agency can only offer a trip that is outside the one-hour negotiating window (before or after the individual's desired departure time). This represents a denial regardless of whether the rider accepts such an offer.
3. A rider requests a round-trip and the transit agency denies a rider the outbound portion of a requested round-trip and only offers a return trip. If the rider then elects not to travel at all, this represents two denials. However, if an agency denies a "going" trip and the rider accepts a return trip, then this is counted as one denial.

**Limited English Proficiency:** Only log callers whose English is so limited that either: (a) the trip cannot be serviced; or (b) the call must hand off the phone to someone else to complete the order.