

VERMONT OLDER ADULTS & PERSONS WITH DISABILITIES PROGRAM MANUAL & BACKGROUND CHECK POLICY



Vermont Agency of Transportation
Policy, Planning, and Intermodal Development Division

219 North Main St, Barre, VT 05641
<http://vtrans.vermont.gov/>

Revised 1/3/2025
06/09/2020

CONTENTS

1.	Older Adults & Persons with Disabilities Transportation Program	4
1.1.	Public Policy.....	4
1.2.	Eligible Grant Applicants	5
1.3.	Submitting Grant Applications	5
1.4.	Review and Approval of Grant Applications	5
1.5.	Regional O&D Advisory Committees	6
2.	O&D transportation services.....	7
2.1.	Demand Response Service	7
	Authorized Mode of Transportation.....	7
	Rider Assistance.....	8
	Vehicle Capacity	9
	General Public Passengers	9
	Youth and school-aged passengers	10
	Disruptive Passengers, Rider Code of Conduct, and No Shows	10
	Disruptive Passengers.....	10
	Rider Code of Conduct	10
	No-Show Procedures	10
2.2.	Service Quality.....	11
	Driver Licensure and Screening.....	11
	Background Checks.....	11
	Trainings.....	11
	Scheduling.....	11
	Health and Safety	12
	Grievance Procedures.....	12
	Documentation Requirements.....	12
	Trip Manifest Requirements	12
2.3.	Eligible Costs and Cost Matching.....	13
2.4.	Reports.....	15
2.5.	Background Checks.....	16
	National Criminal Information Center (NCIC) & Vermont Criminal Information Center (VCIC).....	17
	Adult Abuse Registry & Child Abuse Registry.....	17
	Department of Motor Vehicles (DMV)	17

Office of Inspector General (OIG)/LEIE 17

3. Useful Abbreviations and Definitions 17

 3.1. Abbreviations 17

 3.2. Definitions 18

Appendix A..... 21

 OLDER ADULTS & PERSONS WITH DISABILITIES PROGRAM INTAKE FORM..... 22

 CONSENT FORM 23

 NO SHOW NOTIFICATION LETTER 24

 RIDER CODE OF CONDUCT 28

1. OLDER ADULTS & PERSONS WITH DISABILITIES TRANSPORTATION PROGRAM

Vermont’s Older Adults and Persons with Disabilities (O&D) Transportation Program continues to play an important role filling gaps in existing transportation services for older adults age 60 and above and individuals with disabilities. Vermont’s public transit providers serve as regional transportation brokers and work with human service agency partners to coordinate O&D trips together with Non-Emergency Medical Transportation (NEMT) provided through Medicaid, contracted service with community organizations and institutions, and transportation for the general public. This coordinated transportation approach extends the impact of available O&D funding, as the regional brokers utilize multiple funding sources and fill capacity on vehicles to the maximum extent possible.

1.1. Public Policy

It is the goal of the State of Vermont to fulfill, insofar as is feasible, the public transportation needs of older adults and persons with disabilities. State law—[24 V.S.A. § 5083](#) (a) (1)—states the primary goal for public transit is providing “basic mobility for transit-dependent persons.”¹ The Vermont Agency of Transportation (VTrans) uses funding from the Federal Transit Agency (FTA) [49 U.S.C. §5310](#) program to partially meet this goal. That separate program is a formula allocation program, based on census counts of older adults and persons with disabilities in each state. Federal funds must be partially matched by non-Federal contributions. VTrans awards the population-based §5310 formula grants to organizations that purchase vehicles whose principal use is to meet unmet transportation needs of older adults and persons with disabilities.²

Because Vermont has a small population, the §5310 formula allocation is insufficient for meeting the special transportation needs of older adults and persons with disabilities for whom mass transportation services are unavailable, insufficient, or inappropriate. To increase services, enhance efficiency, and be more effective, Vermont also administers this program, a supplementary transportation program for older adults and persons with disabilities (O&D Transportation), as an integral component of its public transportation program.

The §5310 formula allocation program buys vehicles. The primary use of those vehicles is to meet the unmet transportation needs of older adults and persons with disabilities. The O&D Transportation program, on the other hand, pays for some rides (purchase of transportation services, rather than purchase of vehicles) for older adults and persons with disabilities. The O&D Transportation program coordinates funding from several Federal, State, and local sources—including non-governmental sources—to make public transportation accessible, safe, responsive, reliable, convenient, and affordable for as many persons as possible. Additionally, Section 3006(b) of the 2015 FAST Act and the 2021 Bipartisan Infrastructure Law, enacted as the Infrastructure Investment and Jobs Act created a discretionary pilot program for innovative coordinated access and mobility and examples of traditional

¹ *Transit dependent person as used in this context* means either a person who is unable to drive either because of age or disability or legal status or not having have access to a car because of income.

² For additional information, refer to the FTA’s Enhanced Mobility of Seniors & Individuals with Disabilities- Section 5310 webpage <https://www.transit.dot.gov/funding/grants/enhanced-mobility-seniors-individuals-disabilities-section-5310>.

and non-traditional activities funded under these funds.³ Eligible projects include both traditional capital investment and nontraditional investment beyond the Americans with Disabilities Act (ADA) complementary paratransit services.

1.2. Eligible Grant Applicants

In each public transportation region of Vermont, VTrans designates a single public transit provider as the administrative entity to submit an annual grant application for funds for O&D Transportation. This allows maximum coordination and efficiency among all stakeholders within each planning region of Vermont. Although Federal regulations allow for all non-profits to apply for and receive funding, to advance the goal of a fully coordinated public transportation system, VTrans will accept only a single integrated grant application to fund public transportation from each region. Stakeholders interested in partnering with the regional provider in their area should contact the administrative entity responsible for the delivery of O&D services. The one exception to those eligible is the Vermont Association for the Blind and Visually Impaired. Given the unique services they provide, VTrans will accept one statewide application from them.

VTrans accepts grant applications only if they show that other regional partners and stakeholders worked with the designated public transit provider in preparing the application (i.e. through letters of support, letters specifying match commitment from O&D Partners, meeting minutes that demonstrate that O&D Partners have reviewed and contributed to the grant application, etc.). The application must also demonstrate that efforts are ongoing to coordinate public transportation among regional partners and stakeholders. Regional Planning Commissions (RPCs), human service agencies that operate within a region, municipalities, community organizations, passengers, and the public at large should be invited to participate in public transportation planning and coordination that leads to applying for grants. The designated regional administrative entity may subcontract with other organizations to purchase some or all O&D Transportation services, rather than provide services directly. The decision of how to provide services is based on coordinated regional planning among stakeholders and varies by region. Subcontractors of O&D services will be required to establish a Title VI program if it is determined they fall under the definition of federal subrecipient⁴.

1.3. Submitting Grant Applications

Designated public transit grantees submit integrated public transportation grant applications in the required format. All components of the application—including Committee approvals, required certifications and assurances, service descriptions, and a budget—must be submitted to VTrans by the published filing date. VTrans will not approve incomplete or late applications. VTrans will provide technical assistance in preparing grant applications on request.

1.4. Review and Approval of Grant Applications

³ 49 U.S.C. Section 5310 / Innovative Coordinated Access & Mobility Pilot Program. Additional information can be found <https://www.transit.dot.gov/funding/grants/fact-sheet-innovative-coordinated-access-mobility-pilot-program>

⁴ 2 CFR § 200.330 - Subrecipient and contractor determinations. [2 CFR § 200.330](#)

A committee consisting of all staff in the VTrans Public Transit Section will review all applications and local agreements for funding for the O&D Program and shall develop recommendations for approval and funding. The recommendations shall be submitted to the Secretary of the Agency of Transportation (VTrans) for approval. The Secretary retains sole authority to approve applications and may revise the committee's recommendations at their discretion. After individual grant applications are approved by the Secretary, they are consolidated and submitted to FTA by VTrans as a statewide grant application. VTrans through the Secretary, coordinates all Federal grant activity with FTA. FTA reviews all statewide applications and approves Federal funding.

Upon approval of the statewide grant application by FTA, VTrans and each grantee execute an individual grant agreement (contract). Individual grant agreements specify the terms and conditions under which public transit will operate in each region.

1.5. Regional O&D Advisory Committees

O&D Partners and relevant stakeholders are organized into Regional O&D Advisory Committees (Committees). Each public transit region must designate its own Committee. Regional Planning Commissions (RPCs) shall organize and facilitate Committees. In some cases, two RPCs may share responsibilities for a Committee if the transit district area covers more than one RPC region. Committees may be subcommittees of Transportation Advisory Committees that also deal with other transportation issues, or they may be separate committees. Annually, VTrans shall include expectations and guidelines for Regional O&D Advisory Committees within the Transportation Planning Initiative (TPI) Work Program Guidance issued to RPCs and the Metropolitan Planning Organization (MPO). Tailored guidelines will be distributed to each Committee by its parent RPC or MPO. Additionally, the annual Guidance will be referenced in the annual Transit Provider contracts with VTrans.

Committees may incorporate preexisting groups that previously participated in public transit and human service transportation planning. Committees may include representatives of:

- involved public transit providers,
- area agencies on aging,
- adult day services,
- community mental health centers/designated agencies,
- community action agencies,
- all Agency of Human Services (AHS) Field Services Directors in each planning region,
- consumer representatives,
- statewide advocacy groups,
- local human service agencies,
- and other concerned parties.

Committees shall meet regularly, or at least quarterly, to receive subcommittee reports and discuss the status of the integrated program. Meetings shall include reviews of current service levels, service quality concerns, budget balances, funding issues, and matters that will improve services to consumers. Reviews of current service levels shall include verifying that services are the most cost effective and appropriate to meeting consumer needs and use only authorized and appropriate modes.

After an organizational meeting of the entire Committee, subcommittees or task forces may be created to deal with issues, such as funding, service quality, changes in transportation needs, etc. HSAs (Human

Service Agencies) should participate in these meetings and monitor the financial status of their projects. More details are included in the Reports section toward the end of this manual.

Each Committee shall develop:

- An annual regional service plan that shall define roles for each participating partner. The transportation needs of each partner and the region will be specified in the regional service plan.
- An annual work program of tasks to be accomplished by the Committee during the year, per the TPI Guidance.

Grant applications will describe how each proposed project contributes to the goals of the regional service plan. A financial plan that allocates available funding shall be part of grant applications. The grant applications will also explain efforts made to obtain funding from other sources. Local agreements among regional partners shall be included with the grant application. VTrans will review these local agreements and may request clarification, but VTrans is not a partner to local agreements. VTrans shall make staff available to provide technical assistance at Committee meetings. If issues or concerns cannot be addressed before submitting grant applications, VTrans will help craft suitable solutions that avoid interruption of services.

2. O&D TRANSPORTATION SERVICES

O&D Transportation is an integral part of transportation for the general public. To preserve resources and benefit as many persons as possible, passengers are to be encouraged to use the least costly transportation mode that meets their needs. In most cases, the lowest-cost mode is fixed-route buses that follow a regular schedule of stops at designated locations. In cases where fixed-route public transit is unsuitable for the needs of the consumer, demand response door-to-door service may be possible, if funding and other resources are available. The budget designated for O&D Transportation will be specified, within the overall \$5311 general rural public transportation program budget.

2.1. Demand Response Service

Most often, demand response service is used by those who are 60 or older or who have a disability that interferes with one or more major life functions. Demand response service may choose to require a forty-eight hour advance notice for all reservations but is encouraged to use at least twenty-four hours advance notice. The advance notice reservation time will be clearly published on the Transit Agencies website and on all printed O&D Transportation material.

Demand response service may be supplied by volunteer drivers who use their own vehicles, vehicles owned by the public transit system and driven by employees, or, if necessary, taxis. Whenever possible and appropriate to meeting the needs of passengers, more than one passenger should ride in each vehicle to reduce per-trip costs.

Authorized Mode of Transportation

The appropriate mode of transportation is determined as part of an intake process when a passenger requests demand response service. Each passenger's need is periodically reevaluated by the O&D Partner/s and the Transit Agency to reconfirm eligibility. Local agreements between public transit providers and affected human service agencies may specify procedures for periodically reevaluating the type of transportation appropriate to passengers with disabilities. Both human service agencies and

public transit providers should provide information to assure that reevaluations are in the best interest of each passenger and resulting recommendations are appropriate for passenger needs.

Transportation providers will ensure that each rider's Medicaid eligibility is checked and confirmed, at least every six months, before a trip through the O&D Transportation program is scheduled and provided. The Medicaid check performed for Medicaid trips can be used as the O&D check. If the rider is found to be active on Medicaid, then the transportation provider will assist the rider in scheduling and/or booking the trip under the Medicaid transportation program. When riders request trips outside of region, the transportation provider should check with them to determine if the same care can be accessed within the region. Transportation provider will assist the rider in switching their services to the closer in region provider if possible.

Trip lengths of greater than 30 miles will be reviewed by the transportation provider to determine if there is a closer service provider that may be available. Trip request for specialized services only offered at one location in Vermont should be accommodated as capacity allows. A rider should inform the Transit Agency that the requested service is only available at one service provider or provide a referral from the rider's primary care provider. Riders that have been with a provider for more than four (4) year should be accommodated as capacity allows. Out of State trip can be denied under O&D if the trip was also declined by Medicaid.

O&D Transportation must be safe and must accommodate passenger assistive mobility aids, such as wheelchairs—if those mobility aids meet the approved ADA definition⁵ and can be accommodated on the vehicle (e.g., they fit on the lift or ramp and in the securement area). Agencies may only decline to transport a wheelchair occupant if doing so would be inconsistent with “legitimate safety requirements,” as discussed below. A vehicle that complies with the base Part 38 specifications will be able to accommodate, at a minimum, all occupied wheelchairs weighing up to 600 pounds and measuring 30 inches in width and 48 inches in length (formerly known as a “common wheelchair”). Vehicles that exceed the minimum Part 38 specifications (e.g., those that have lifts with design loads of 800 pounds and securement areas larger than 30 x 48 inches) will accommodate larger, heavier devices.

Non-accessible vehicles may be used for passengers who do not require special accommodation, but accessible vehicles must be available when needed. Buses, mini-buses, private automobiles, taxis, and vans are acceptable. New vehicles acquired with Federal or State funding to transport passengers in public service must be fully accessible.

Rider Assistance

Drivers will provide door to door assistance to older adults and persons with disabilities who require such aid. Drivers must successfully complete instruction on passenger assistance and be currently certified to provide such assistance by the public transit provider before transporting passengers who may require assistance. If a driver is unable to provide such assistance to a passenger who needs it, the transit provider must dispatch a driver who is able to provide the needed assistance.

⁵ Section 37.3 of the DOT regulations implementing the Americans with Disabilities Act of 1990 (ADA) (49 CFR Parts 27, 37, and 38) defines a “wheelchair” as 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. For more information see:

https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/Final_FTA_ADA_Circular_C_4710.1.pdf

For passengers who need help, the driver will assist the passenger from the outside door of the pick-up location to the outside door of the drop-off location. Insurance and vehicle security concerns preclude drivers from entering buildings with passengers. Passengers who need assistance inside a building must arrange for an aide. Providing aides is not the responsibility of public transit providers; however, they shall work with HSAs as needed.

A passenger may be accompanied by an aide or attendant if such assistance is needed. The aide's assistance may be needed on or off the vehicle. The aide or attendant is considered part of the O&D Transportation program whose sole purpose is to assist the eligible passenger. Therefore, the aide or attendant is not charged a fare but is considered necessary so the eligible passenger can use transportation services. Passengers who need the assistance of an aide or attendant must inform the dispatcher or their human service agency when they schedule a trip, so appropriate seating arrangements may be made.

Providers using lift equipped vehicles to provide transportation may conduct a site visit to drop off and pick up locations to confirm the vehicle can safely park and deploy the lift to pick up a rider. The check could include confirming the lengths, ground and lift clearance and maneuverability of the vehicle. In the event the passenger uses a mobility device, ADA compliant ramps from the doorway to the ground are expected to keep the driver and the passenger safe when moving from the home to the lift. The provider will make a site visit if access is in question at any new address where accessibility is undetermined. If there are any limitations to access identified, passengers will be notified in writing as well as by phone. Providers will work with passengers to resolve access constraints and provide community resources to help facilitate a remedy that minimizes risks and still provides service. Providers reserve the right to deny service if access poses too much risk such as potential injury to persons or vehicles. Provider will report findings to VTrans.

Vehicle Capacity

It is desirable that vehicles operate at capacity when possible. However, the primary responsibility of transit providers is to ensure that each passenger receives safe, comfortable, and timely transportation. The timing of appointments or the length of trip may require that vehicles operate at less than full capacity. The collective professional judgments of public transit providers and human service agencies will determine appropriate dispatching, scheduling, and seating arrangements on a case-by-case basis. These arrangements will consider the functional abilities of passengers, which may change over time.

In limited cases, if there are empty seats in a vehicle that can be used safely by other passengers, without compromising service quality, the unused capacity may be offered to those with schedules and destinations that are a good fit. In all cases, unused capacity is determined not only by the availability of empty seats, but also by the ability of the driver to assure that every passenger aboard will receive a safe, comfortable ride that meets or exceeds all quality expectations. Arrangements to include members of the public on demand response vehicles that carry passengers with disabilities must be evaluated by trained Human Service Agencies staff on a case-by-case basis. General public passengers will be accommodated on a space available basis.

General Public Passengers

General public passengers must pay the fully allocated cost of their rides, as specified in public transit providers' published fares. No passenger will pay more than the fully allocated cost of their ride. In most cases, disabled passengers who are referred by a human service agency that has a local service

agreement with the public transit provider giving the ride do not pay cash fares. The cost of their transportation is paid under the terms of the local agreement. Aides approved by the referring human service agency also do not pay cash fares for their rides. However, travelers without an official role in assisting passengers are considered general public passengers who must either pay the fully allocated cash fare or make other acceptable arrangements to pay for their rides on vehicles. This is true for any public passenger who accompanies a disabled passenger as a social companion, rather than as an aide.

Health, safety, behavioral, or confidentiality concerns may preclude transporting disabled passengers with other passengers on the same vehicle. Public transit providers and human service agencies shall cooperate to determine the transportation suitable for each disabled client. In no event shall passenger health, safety, well-being, or the confidential nature of passenger medical records be compromised for any passenger. Passenger welfare is the primary consideration in determining the appropriate coordination of passengers on a vehicle.

Youth and school-aged passengers

Children under the age of 5 must be accompanied by a responsible adult. Passengers ages 5-10 may ride unaccompanied but must have a responsible adult waiting for them at the drop off location. Responsible adults must provide their contact information before the service occurs. In the event there is not a responsible adult at the drop off location, The driver will not leave the child. There will be an attempt to reach the responsible adult. Passengers between the ages of 11-18 may ride unaccompanied and be dropped off without a responsible adult based on driver discretion.

Disruptive Passengers, Rider Code of Conduct, and No Shows

Disruptive Passengers

The O&D program ensures that transportation to and from necessary services is available for eligible riders. Transit providers may not deny transportation services because the member is unpleasant or disagreeable. In cases where a rider's behavior is obnoxious or offensive but not dangerous or illegal, the Transit provider should inform the member in writing that the behavior is unacceptable and may jeopardize future transports.

Rider Code of Conduct

The O&D program has adopted the Vermont Public Transit Association's (VPTA) Statewide code of conduct as the O&D program's code of conduct. The 2024-25 version is included in Appendix A. Transit providers should request an updated copy of the code of conduct from VPTA each year. The Transit provider will give out a copy of the code of conduct to all new riders and existing riders at least once a year. A copy of the code of conduct will also be displayed inside the vehicles being used to transport riders. In the case where the code can not be displayed a copy will be available to hand out to riders. The Transit provider should inform the member in writing if they violate the rider code of conduct and that the behavior is unacceptable and may jeopardize future transports. Agencies, at their discretion, can use no trespass notifications or warnings for passengers that violate the rider code of conduct especially if the act is considered dangerous or illegal.

No-Show Procedures

At the first recorded no-show by a rider, the Transit provider will send out the "No-Show Warning Notice". After the third no-show, the Transit provider must send a "No-Show Call Ahead Notice" to the rider that advises that they will now be required to call the Transit provider to set up rides and to

confirm those rides before they take place. A rider with three no-shows will be required to call in advance to confirm their ride the day before the scheduled appointment by noon. If the appointment is on a Monday, the member will need to call on Friday by noon to confirm. If the member does not call in, the driver will not be sent for the pickup, and the ride shall not take place. Good cause for missing rides may be taken into consideration when addressing specific no-show incidents. Late or last-minute appointment cancellations by providers shall not be counted as no-shows for members. After being placed on the call ahead list if the member no-show three more times within the next 30 days then the members can be removed from the O&D program by the Transit provider. If there are no no-shows in the next six months, the rider may be allowed to revert to the normal process. A notice advising of this change must be sent to the rider. Any subsequent no-show, however, will result in the rider again being forced to comply with the call-in guidelines.

2.2. Service Quality

Driver Licensure and Screening

Drivers must be properly licensed to operate vehicles used in any public transportation program funded via VTrans. Only drivers with a history of safe driving are acceptable and Department of Motor Vehicle (DMV) checks are required before hiring. Drivers who use their own vehicles must present evidence of adequate insurance. All active paid drivers, dispatchers, and mechanics must be included in a pool of safety-sensitive persons who are subject to periodic screening for drug and alcohol use in accordance with FTA rules. Public transit providers may adopt their own written rules for drug and alcohol abuse if all FTA standards are met at a minimum.

Background Checks

In accordance with Federal mandate (CFR455.436), background checks must be performed on all employees, all volunteer drivers, taxi company employees, and all other subcontractor staff – both administrative and direct service providers. Additional information can be found in Section 2.5: Background Checks below.

Trainings

Drivers and dispatchers must be trained in the special needs of passengers who are older adults or who have disabilities, including those disabilities that may not be immediately apparent. Training shall include confidentiality rules that apply to passengers' medical and personal information. Recurring training must be provided for Passenger Assistance Safety and Sensitivity (PASS) to all van/bus and volunteer drivers. Van/bus drivers must also maintain certifications in defensive driving such as Smith System. All van/bus and volunteer drivers must be educated in the company's accident/incident reporting policy. They are required to report all accidents/incidents from the scene and fill out a company incident form and police report if applicable. Transit providers shall enlist the assistance of local human service providers and advocacy organizations in delivering additional annual trainings including assisting individuals with dementia and Alzheimer's.

Scheduling

Public transit dispatchers shall cooperate closely with Human Service Agencies (HSAs) and shall become familiar with the individual needs of passengers who regularly use demand response services. To the extent possible, public transit providers shall comply with scheduling and transportation requests of HSAs. Local agreements (contracts) between HSAs and transit providers will spell out arrangements for resolving disputes over specific transportation arrangements. Except for special circumstances, such as

trips for large groups, public transit providers shall require no more than 48 business hours advance notice to schedule O&D transportation. Public transit providers and human service agencies shall notify passengers of the requirements for advance notice, including cancellations and schedule changes. Passengers will also be informed of the public transit provider's policy on trips cancelled without notice and other expectations of passengers. Trips scheduled on behalf of the rider by another person should have a consent form on file with the transit provider. The form should confirm who can discuss the rider's transportation and whom is authorized to book trips on their behalf. The consent form should be reviewed annually with the rider and updated as needed.

Health and Safety

Public transit providers shall assure that all vehicles are properly equipped to meet or exceed health and safety requirements. Vehicles must be inspected and maintained at least to manufacturer's specifications. Vehicles must be properly equipped and maintained in accordance with laws governing the operation of motor vehicles in the State of Vermont. Any vehicle problems must be corrected promptly. No vehicle with uncorrected problems that may pose health or safety dangers may be used in public transportation.

Grievance Procedures

Each public transit provider must have a documented system in place to receive and record allegations of inappropriate behavior by its employees, passengers, or volunteers, investigate incidents, and rectify problems. Similar reporting must be available for safety concerns and other issues, such as service that is not timely.

Each public transit provider shall have clearly written grievance procedures available to both the public and HSAs. These procedures are required under Title VI to be posted on their website, buses and offices.

These procedures shall include notifying passengers of their right to file complaints and the progressive steps to take if a grievant believes an issue is unresolved. Procedures shall specify actions the grievant must take and what responses the grievant may expect. Time limits for filing grievances and responding to grievances shall be included. Grievance procedures must be approved by VTrans and must include contact information for passengers who want to submit disputes directly to VTrans.

Documentation Requirements

All State of Vermont contracted entities are required to keep records for 7 years. All records must be available at any time for review by Federal or State authorized staff, including all audio and video recordings. These records must be available for review as requested by VTrans staff. This requirement also applies to all subcontracted drivers. These records may be kept in electronic form if they are still readily obtainable upon request.

Trip Manifest Requirements

All trip manifests must be retained, and they must include:

- Full date of trip
- Driver's full name/signature
- Miles traveled (odometer readings)
- Member's full name

- Pick-up and drop-off locations
- Pick-up and drop-off times (actual)
- The time the driver starts and stops billing

2.3. Eligible Costs and Cost Matching

Both capital and non-capital costs are eligible for reimbursement⁶. No cost that is unallowable for Federal reimbursement, as specified in FTA and OMB circulars, is an allowable expense. Only categories of expense that are in the budget of an approved grant application will be approved for reimbursement. If an approved budget must be either increased or decreased, the amended budget must be approved by VTrans before it takes effect. This includes transfers of funds between grantees by mutual agreement. To avoid delays in reimbursement caused by the need to amend a grant agreement, applicants are urged to develop budgets with care. The total award amount of a grant agreement is a ceiling that may not be exceeded. If a grantee incurs costs that exceed the MLA, those costs are not reimbursable by VTrans.

Grantees must match Federal grant funds from non-Federal sources. Administrative and preventive maintenance expenses (including volunteer driver reimbursement) require a 20% match (80% Federal grant funds and 20% from other sources). Operating expenses—which VTrans defines as fuel, driver wages, dispatcher wages, and the fringe benefit expenses associated with those wages—are subject to a 50% match. Because of the higher match requirement for operating costs, Vermont annually appropriates State funds that may be used to meet some Federal match requirements. The annual amount appropriated from State funds is not guaranteed. Human service agencies will not be required to provide more than 20% match to support their requested O&D transportation services.

Public transit providers may use hours of service by volunteer drivers, including time spent driving and wait time, as non-cash match. Hours of service are defined by agreements between volunteers and the provider to which they donate their time. In some cases, agencies may allow waiting time, as well as driving time, to be considered an hour of service, if waiting time is a normal consequence of a trip. The volunteers must be part of a pool administered by grantees (designated regional public transit providers) or by local human service agencies under the terms of a local agreement. VTrans allows only the hours of volunteer drivers to be used as match. The hours of other volunteers are ineligible for use as match.

Public transit providers reimburse drivers for documented mileage at no more than the published standard Federal reimbursement rate. Public transit providers and human service agencies must record volunteer drivers' hours with at least the same degree of care used to track hours of paid hourly employees. These time records must be available for audit and review in the same manner as other accounting records. The provider to which the hours are donated must have a system to ensure that no volunteer hour of service is used as non-cash match more than once. Public transit providers may claim those hours as local match for this O&D Transportation project. (VTrans does not allow using non-cash match on other projects.) Each hour is valued consistent with 2 CFR § 200.306(e). Fringe benefits provided to paid employees may be included in the valuation. The hourly rate is calculated by taking the average of all driver's hourly wage rate plus fringe benefits. No other non-cash match may be used

⁶ Vehicle acquisitions are not included in this E&D Transportation program manual. Separate applications, with different guidelines, are required to procure vehicles.

without prior written permission of VTrans.

HSAs may enter into local service agreements directly with public transit providers. These contracts/agreements may either call for a cash payment for each ride or a payment for specified services over a period. VTrans shall review these contracts to assure they comply with FTA and State rules for transportation grants. VTrans is not party to these local agreements. If these contracts call for HSAs to pay transit providers cash in return for transporting HSA clients, that cash is not considered revenue from fares. Therefore, it may be used as local match applied to their local agreement for services. This exception applies only to contracts between providers and HSAs.

Other payments for transportation are classified as fare revenue. FTA rules require fare revenue to be subtracted from expenses before claiming reimbursement. Fare revenue may not be used as cash match on the project that earned it. After the expenses are reduced by the amount of fare revenue, the cash may be used as the provider sees fit, including as match for a different Federal project.

Grant applicants must certify that they have or will have sufficient match for Federal grant funds. If a grantee does not provide sufficient match, unmatched Federal funds must be returned.

If unspent funds remain in a region, VTrans will attempt to reallocate funds to regions with funding shortfalls. To qualify, recipient public transit provider(s) must document that services that were provided to eligible riders were not reimbursed. There is no assurance that funds will be available for such transfers. All recipients of O&D funding are strongly urged to closely monitor expenditures and stay within budget.

An effective way to enhance O&D Transportation is to share resources. When resource sharing meets the needs of all passengers, passengers whose rides are paid for with other funds—such as Medicaid—can ride on vehicles purchased with §5310 funds and share other O&D Transportation resources, such as centralized scheduling and dispatching. When each funding source contributes its fair share of fully allocated costs, resources are used more efficiently, thereby reducing the cost of each ride.

Eligible trip types include:

- Critical Care Non-Medicaid – Transportation to kidney dialysis and cancer treatment appointments.
- Non-Medicaid Medical needs – All trips to non-emergency medical appointments, except Critical Care Non-Medicaid as defined above.
- Senior Meals Programs – Trips to local congregate meal programs or group settings for seniors at a meal site approved by the local AAA as outlined by the Older Americans Act.
- Adult Day Services – Services include professional nursing services, respite, personal care, therapeutic activities, nutritious meals, and support and education to families and caregivers in a community-based, non-residential day center not covered under the Medicaid program.
- Wellness – Trips to providers of wellness programs such as nutrition, smoking cessation, pre-diabetes, chronic pain management, or exercise programs at a qualifying center
- Shopping – Trips to local grocery store, pharmacy, food shelves, thrift shops, clothing and/or hardware stores.
- Vocational – Trips to paid employment, interviews or training programs
- Social/Personal – For socialization and/or personal trips. Trips could include: religious services, personal trips (such as hair appointment or visiting a family member).

Effective July 1, 2018, and thereafter, Subrecipient, or any subcontractor, must do the following:

1. Use to collect, report, dispatch and generate electronic billing information from the Dispatching and Scheduling Software (reports shall match VTrans billing to be considered eligible reimbursement as outlined in Attachment B – Payment Provisions, D. 49 U.S.C. § 5311 Older Adults & Persons with Disabilities Program and included in this Grant Agreement); and
2. Create and maintain a volunteer program, with the assistance of Subrecipient’s O&D Advisory Committee and VTrans, on a GSA reimbursement with the use of the volunteer’s own vehicles by June 30, 2018.

Effective July 1, 2009, and thereafter, excursion trips are not eligible. Subrecipients should follow FTA Charter Regulations ([Charter Bus Service Regulations | FTA](#)).

In addition, the Subrecipient will work collaboratively with VTrans, Agency of Human Services, its Regional O&D Advisory Committee, and the other public transit Agencies to promote coordination in order to reduce expenditures, improve or increase service, and use resources more efficiently.

2.4. Reports

Uniform statewide reporting is needed to properly evaluate this program and ensure that services for older adults and persons with disabilities are preserved and will improve over time. Detailed reports will form the basis of discussions among stakeholders at mandatory Regional O&D Advisory Committee meetings to determine budget allocations and service levels are proper. It is the intent of both AHS and VTrans that O&D Transportation service levels, in combination with §5310 vehicle procurements, are greater than or equal to similar transportation services provided to older adults and persons with disabilities during State Fiscal Year 2018. To this end, an amount designated for the O&D Transportation program will be separately identified within the §5311 overall rural general public transportation budget. The designated O&D budget within the state and within each region shall not be reduced to provide additional transportation to the general public.

Regional O&D Advisory Committee meetings will review budgets and expenditures to ensure that budgets are properly managed to continue throughout the grant year. If a Regional O&D Advisory Committee foresees a budgetary shortfall, it will institute measures to determine the greatest need for remaining funds and will reallocate funds as necessary to have the smallest possible negative impact on O&D Transportation services.

Reports from public transit providers to VTrans are specified in grant agreements. The specifications include the statewide format of reports. Public transit providers send service indicator statistics to VTrans monthly with invoices. Reports by public transit providers to VTrans include unduplicated counts of older adults and persons with disabilities served, unduplicated counts of older adults and persons with disabilities who use the O&D program to go to and from kidney dialysis treatments, the number of one-way trips by service category, mode, and costs. Cost data should include the quantity and unit (i.e., hours, miles, etc.)

VTrans will compile and summarize the statistics into annual reports and will disseminate these to each member of the Public Transit Advisory Council (PTAC), to each grantee in the O&D program, to the Vermont Center for Independent Living, to the Vermont Coalition for Disability Rights, and to the

Community of Vermont Older Adults. Reports shall include unduplicated counts of older adults and persons with disabilities served, unduplicated counts of older adults and persons with disabilities who use the O&D program to go to and from kidney dialysis treatments, the number of one-way trips by category, costs by transportation mode and the number of denied trips

Any additional reports needed by HSAs are specified in local agreements between HSAs and public transit providers. Annually, VTrans will summarize ridership and other statistics in reports for the General Assembly and Governor. These statistics are among the data considered when periodic management reviews and other studies develop plans for public transit improvements, including the O&D Transportation program. VTrans will evaluate the effectiveness of the O&D Transportation program in meeting the transportation needs of older adults and persons with disabilities and the impact of the O&D program on general public transportation in Vermont. Written O&D analysis will be included in the annual Route Performance Report and presented to the PTAC at the March quarterly meeting for comment. The report will also be made available to the general public on an annual basis on the VTrans website.

2.5. Background Checks

In accordance with Federal mandate ([42 CFR § 455.436 - Federal database checks.](#)) background checks must be performed on all applicants, employees, volunteer drivers, taxi company employees, and all other subcontractor staff – both administrative and direct service providers. These screenings will determine if the individual has a substantiated finding of abuse, neglect or exploitation of a vulnerable adult or child. Screenings shall also be completed for criminal records that suggest passenger abuse, neglect or exploitation may be a potential problem. No person with a substantiated finding of abuse, neglect, or exploitation of a vulnerable adult or child shall be employed or used as a volunteer by a public transit provider. The safety, security, and well-being of passengers shall determine if an employee or volunteer may participate in any VTrans-supported public transportation program.

In summary, applicants must clear all background checks prior to initial hire with the databases listed below, and these must also be rechecked annually unless otherwise noted. If an annual record check reveals deficiencies the employee, volunteer, taxi or subcontractor must be removed from providing O&D transportation services.

- National Criminal Information Center (NCIC)
- Vermont Criminal Information Center (VCIC)
- Child Abuse Registry
- Adult Abuse Registry
- Department of Motor Vehicles (DMV)
- Office of Inspector General – List of Excluded Individuals/Entities (LEIE)
<https://oig.hhs.gov/exclusions/index.asp>

Additional details on background checks can be found in the four subsections below.

National Criminal Information Center (NCIC) & Vermont Criminal Information Center (VCIC)

Individuals must not have a criminal conviction for an offense involving bodily injury, abuse of a vulnerable person, a felony drug offense, or a property/money crime involving violation of a position of trust, including, but not limited to:

- Abuse, neglect, or exploitation
- Simple or Aggravated assault
- Aggravated sexual assault Stalking and Aggravated stalking
- Arson Assault and robbery
- Assault upon law enforcement
- Cruelty to children
- Domestic assault Extortion
- Embezzlement
- Hate motivated crime
- Kidnapping
- Lewd and lascivious conduct
- Manslaughter
- Murder
- Recklessly endangering another
- Sexual assault

Adult Abuse Registry & Child Abuse Registry

Individuals must not have a substantiated finding of abuse, neglect, or exploitation of a child or vulnerable adult.

Department of Motor Vehicles (DMV)

If a DMV check reveals any violation, Transit Providers must request a variance from VTrans for approval if the services of this driver are still desired. Non-restricted convictions or motor vehicle violations such as a speeding ticket may be allowed depending upon the situation.

Office of Inspector General (OIG)/LEIE

This list includes the names of individuals who have been convicted of illegal activity regarding fraud or abuse. The search function for this list can be found at both <http://exclusions.oig.hhs.gov/> and <http://sam.gov>. If an OIG check reveals any violation, Transit provider must request a variance from VTrans prior to approval, if such is requested.

Transit providers must also maintain records of all completed background checks on all subcontractor staff who provided O&D transportation services.

3. USEFUL ABBREVIATIONS AND DEFINITIONS

The transportation options in Vermont communities are likely to include some of the services listed below. Keep in mind that names of these services may vary depending on location.

3.1. Abbreviations

VTrans Vermont Agency of Transportation

AHS	Vermont Agency of Human Services
COA	Council on Aging
O&D	Older Adults and Persons with Disabilities Program
FTA	Federal Transit Administration
HSA	Human Services Agency
NEMT	Non-Emergency Medical Transportation
PTAC	Public Transit Advisory Council
RPC	Regional Planning Commission

3.2. Definitions

Demand Response- Sometimes called Dial-a-Ride, demand response transports multiple passengers who are picked up from different entry points and dropped off at separate destinations. This service often requires reservations to be made at least 24–48 hours in advance.

O&D Grant- Transportation providers working with human service agencies apply to VTrans annually for grant funds to cover operating costs associated with providing transportation to Older Adults and person with disabilities. The grant application process begins in March, culminating in a Grant Agreement between VTrans and the transportation provider for a fiscal year that begins on July 1. The grant reimburses for 80% of actual operating costs, with the remaining 20% either coming from human service partners or in-kind. Local Agreements are entered into between the transportation provider and human service agencies to detail the scope of transportation services to be provided as well as other details including how the required 20% local match will be met.

O&D Partner- A formal member of the O&D Committee. Partners will vary regionally, but typically include the following organizations: Transit Provider, Regional Planning Commission, Adult Day and Senior Center, Agency of Aging, Hospital and/or Healthcare groups, and municipalities. Local agreements are entered into between the transportation providers and partners receiving transportation services to detail the scope of transportation services to be provided. Partners whose clients receive transportation services funded through the O&D Program contribute towards the required 20% local match, either via cash or in-kind.

O&D Stakeholder- Either an “ad-hoc” or a formal member of the O&D Committee. Will vary by region. Could include Regional Planning Commissions, human service agencies that operate within a region, municipalities, community organizations, passengers, and the public at large. Stakeholders should be invited to participate in public transportation planning and coordination that leads to applying for grants.

Federal Transit Administration (FTA)- A component of the U.S. Department of Transportation that regulates and helps fund public transportation. FTA provides financial assistance for capital and operating costs and also sponsors research, training, technical assistance and demonstration programs.

Human Service Agency- A government or not-for-profit organization that provides services for essential needs such as medical care, income support, housing, education, training, and public health, typically for people requiring help due to age, disability, low income or similar reasons.

Human Service Transportation- Transportation provided by or on behalf of a human service agency to bring people participating in the agency’s programs or services to those programs or services.

Local Match- The state or local funds required by the Federal government to complement Federal funds for a project. For example, in the case of public transportation, the Federal government may provide 80 percent of the necessary funds for the purchase of a vehicle if the state and transit provider match 20 percent. A match may also be required by states in funding projects which are a joint state and local effort.

Medicaid Non-Emergency Medical Transportation (NEMT)- NEMT is available to persons with Medicaid to travel to and from medical services. Eligibility criteria and types of destinations vary from state to state.

Public transit/fixed route transportation- Public transit agencies provide fixed route service by bus along established routes with set schedules and no reservations required. Limited fixed route services may be available through other community agencies, such as trips to and from a Center for Independent Living or a senior center.

Paratransit- Must be offered by public transit agencies to individuals who are not able to use fixed route service. This is a requirement of the Americans with Disabilities Act (ADA). Paratransit is a complement to public transit, so must operate within $\frac{3}{4}$ of a mile of the fixed route and is available during the same hours as the fixed route service. Paratransit is a door-to-door service. A personal care attendant can travel with the passenger at no cost. To qualify for paratransit, riders need to meet specific eligibility requirements established under ADA.

Section 5310- Authorized under 49 USC Section 5310, a Federal program administered by USDOT to provide small buses and vans to eligible agencies which provide transportation services to elderly and disabled persons.

Shared Ride Services (also known as Transportation Network Companies or TNCs)- Include Uber and Lyft and connect private pay passengers with drivers who provide transportation in their own vehicles. These services do not typically offer wheelchair accessible vehicles or rider assistance. Passengers connect with drivers via websites or mobile apps on a smartphone and also pay for the services through a personal account on their phone. A growing number of communities offer access to shared ride services to older adults and people with disabilities through a scheduling phone line which may be operated by a nonprofit organization.

Subcontractor- A legal entity to who a contractor sublets part of the work.

Subrecipient- An organization who received a grant or loan of federal funds from a non-federal organization such as the State of Vermont. Subrecipients are also referred to as grant recipients or grantees.⁷

Taxi Services- Taxis are licensed vehicles that offer on-demand services to passengers. Trips usually can be scheduled in advance or on the spot, and fares are charged per mile or per minute. Many communities require taxi companies to have accessible vehicles in their fleets. Some community

⁷ The Federal Uniform Guidance specifies that a subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient. 2 CFR 200.1 "Subaward" [https://www.ecfr.gov/current/title-2/part-200/section-200.1#p-200.1\(Subaward\)](https://www.ecfr.gov/current/title-2/part-200/section-200.1#p-200.1(Subaward))

agencies offer taxi vouchers to older adults and people with disabilities who meet certain eligibility criteria.

Transportation Voucher Program- Voucher programs provide fare assistance or free rides to low-income older adults and people with disabilities who meet the program's eligibility criteria. Eligible riders usually receive vouchers for specific types of transportation. Voucher programs may offer rides only to certain destinations, such as medical appointments.

Travel Training- Public transit agencies and local aging and disability organizations provide free instruction to help new riders learn to travel safely on public transit. Travel training may be provided by professionals or peers who are experienced users of public transit. The training generally includes classroom instruction plus a group trip on transit.

Volunteer Driver- Services provided by volunteer drivers who use their own vehicles, donate their time to transport riders, and receive reimbursement for mileage at the federal rate.

Volunteer Transportation Programs- May be offered by local nonprofit and faith-based organizations. Drivers provide rides in their own cars or provider-owned vehicles for passengers to reach medical appointments or other important destinations. Rides are generally pre-arranged. Volunteer transportation programs may also offer door-to-door or door-through-door assistance. Some programs require riders to pay a small fee while others offer free rides.

APPENDIX A

OLDER ADULTS & PERSONS WITH DISABILITIES PROGRAM INTAKE FORM

Older Adults and Person with Disability In-Take Process

Employee: _____ Date of call: _____ Time of Call: _____

Customer Name: _____ Medicaid #(UIN) _____ Code: _____

1. Confirm Medicaid Eligible? ___ Yes ___ No ___ Date of last check _____

***If uncertain, before an O & D ride can be provided, complete an SS# check of Medicaid eligibility. If member is unaware of SS# or unwilling to share it, send VPTA name and DOB, and we will confirm with Medicaid. Document the date of the check and repeat every six months.**

2. Check for current O&D Guidelines. If not on file or sent once, resend. (Include current Code of Conduct)

3. Does the address match what is on file? Yes ___ No ___ If no add or update address on file

4. Appointment Details:

Date: _____ Time: _____

Location: _____

5. Rider use a mobility device. Yes ___ No ___ If yes what type/s _____

6. If they use a mobility device, can they transfer from the device to a seat? Yes ___ No ___ If yes is the device collapsible Yes ___ No ___

5. Is the trip over 30 miles? (Closest available provider)

No ___ Yes ___ (Follow O&D guidance for trips over 30 miles)

Doctors or Office Name _____

6. Can this member use Public Transit for this trip?

Yes ___

No ___ (If the answer is no, they must live more than $\frac{3}{4}$ miles from the route that can be used for the trip OR have a Public Transportation Medical Exemption on file.)

7. Did you repeat the trip details to the client before hanging up? Yes ___ No ___

CONSENT FORM

Add Letter Head

Dear:

Please complete the information below indicating whom we can discuss your transportation with and whom you authorize to make transportation arrangements on your behalf. If you have any questions, please contact us. You may also email it back to us at

Thank you.

I _____ grant permission to _____
to contact _____ on my behalf to book transportation.

This authorization is effective until _____.

NO SHOW NOTIFICATION LETTER

[Insert Provider Letterhead/Logo, including agency address, phone, email & website]
Older Adults & Persons with Disabilities Transportation Program (O&D)
No-Show Warning Letter #1 or 2
No-Show # __

Date:

Member Name

Member Address

Member Town, State, Zip Code

Dear [Insert Member Name],

[Insert Agency Name] helps people 60 and old or those with a disability get rides to doctor appointments, pick up prescriptions, access meal sites, or shop. We scheduled a ride for you, but you were not there to be picked up by our driver on [Insert date] for a scheduled appointment at [Insert location address]. This is your ____ No-Show.

It is important to let us know ahead of time (as soon as possible) if you need to cancel your ride for any reason. Failure to cancel your ride with at least a 2-hour notice before your pick-up time will result in a No-Show without reasonable cause.

It will not count as a No-Show if you have a good reason for missing the ride. Late or last-minute cancellations by us do not count as No-Shows for you.

If you do not show up for three rides without having a good reason, you will be placed on the **Call Ahead List**.

Once placed on the Call Ahead List, if you No-Show three additional times in the next 30-day period, you will be removed from the O&D program.

In the future, please call us ahead of time to let us know if you do not need a ride. If you have any further questions, please call us at [Insert Agency Phone Number]

[insert staff signature & transportation agency name]

[Date:]

[Insert Provider Letterhead/Logo, including agency address, phone, email & website]

Older Adults & Persons with Disabilities Transportation Program (O&D)
No-Show Call Ahead Letter #3/3
Third No-Show

Date:
Member Name
Member Address
Member Town, State, Zip Code

Dear **[Insert Member Name]**,

Based on our information, we scheduled a ride for you, but you were not there to be picked up by our driver on **[Insert date]** for an appointment at **[Insert location and address]**. This is your **third No-Show** in the past six months [insert dates of previous no-shows].

This is your third time being a “No-Show” for your ride. You are now on the **Call Ahead List**. As of [Insert date (10-day notice)], you must:

- Call daily to set up all rides,
- To ensure your rides are scheduled, your call must be received no later than 12:00 pm (noon) the day before your scheduled ride.
- Failure to call by 12:00 pm (noon), Monday through Thursday, will result in your trip being cancelled for the following day.
- You must call by Friday at 12:00 pm (noon) to confirm your Saturday, Sunday, and Monday trips. Failure to call by 12:00 pm (noon) on Friday will result in your trips being cancelled for Saturday, Sunday, and Monday.
- Calls to our after-hours voicemail to set up trips will not be accepted.

Now that you are on the Call Ahead List, if you No-Show three additional times in the next 30-day period, you will be removed from the O&D program.

If you have any further questions, please call us at **[Insert Agency Phone Number]**

[insert staff signature & transportation agency name]

[Date:]

Verified No-Show #1

[Insert Provider Letterhead/Logo, including agency address, phone, email & website]

**Older Adults & Persons with Disabilities Transportation Program (O&D)
Verified No-Show #1 or 2**

Date:
Member Name
Member Address
Member Town, State, Zip Code

Dear **[Insert Member Name]**,

Based on our information, we scheduled a ride for you, but you were not there to be picked up by our driver on **[Insert date]** for an appointment at **[Insert location and address]**. This is your _____ **Verified No-Show** after being placed on the **Call Ahead List**. [insert date of call ahead list]. You are proving you have other means of transportation.

If you No-Show _____ more times over the next thirty days, you will be removed from the O&D program.

In the future, please remember to call us [insert agency phone #] ahead of time to let us know two hours before your scheduled pick-up time if you need to cancel your trip for any reason.

If you have any further questions, please call us at **[Insert Agency Phone Number]**.

[insert staff signature & transportation agency name]

[Date:]

[Insert Provider Letterhead/Logo, including agency address, phone, email & website]

**Older Adults & Persons with Disabilities Transportation Program (O&D)
No-Show Removal from O&D Program**

Date:
Member Name
Member Address
Member Town, State, Zip Code

Dear [Insert Member Name],

Based on our information, we scheduled a ride for you, but you were not there to be picked up by our driver on [Insert date] for an appointment at [Insert location and address]. This is your **third and final Verified No-Show** after being placed on the **Call Ahead List**. [insert date of call ahead list and 1st & 2nd verified no-show].

You have been removed from the O&D program.

If you have any further questions, please call us at [Insert Agency Phone Number]

[insert staff signature & transportation agency name]

[Date:]

RIDER CODE OF CONDUCT

VPTA Statewide Code of Conduct 2024-25

DO's:

Pay your fare. **(Applies GMT Urban System Only)**

Stay behind the white or yellow line while the vehicle is in motion; keep the aisle clear and remain seated. Follow the driver's instructions, and do not distract, argue, or threaten the driver.

Ask drivers for assistance in securing pull carts, strollers, walkers, and wheelchairs. Strollers and pull carts must be secured and not obstructing the aisles. Always keep the aisle clear.

Be aware: Priority seating is available at the front seats of the bus for older adults, persons with disabilities, and persons with limited mobility. Bus operators must ask other customers to offer these seats to older adults and persons with disabilities.

Wheelchair Securement Area: By law, we reserve areas where mobility devices can be secured for people who need them. Bus operators must ask customers to provide access to those areas for people using mobility devices.

For safety and sanitary reasons, all passengers must wear shirts and footwear, and odors that disturb others or impact service delivery must be limited.

Use headphones with your electronics to limit distractions to others.

Passengers must always have control of the service animal at all times.*

NO:

The following behaviors may result in the loss of riding privileges.

- **Disruptive or unsafe behavior or use of physical violence, threats, bullying, or harassment.**
 - **Profanity, vulgar or offensive language, including but not limited to racial slurs, derogatory remarks based on race, gender, age, or sexual orientation, or excessive noise.**
 - **Guns, knives, or weapons of any kind are prohibited on vehicles.**
 - **Illegal drugs.**
 - **Use of tobacco, e-cigarettes, vaporizers, and open containers of alcohol is prohibited.**
 - **Exposed body fluids, including body eliminations, saliva, and blood.**
-

NO:

Using the speaker option on your electronic device.

Articles that, because of their size, cannot be safely held by a passenger and stored underneath a seat or that, because of their content, may be dangerous to passengers shall not be allowed on vehicles. These include but are not limited to, car batteries, gasoline, kerosene, or any other flammable liquid.

Using multiple seats or leaving belongings to save seats when the vehicle is full, no feet on seats.

Food and beverages without closed containers; beverages should be in a cup with a sealed lid.

Littering, throwing, or sticking anything (including body limbs) out the window or on the ground from inside the vehicle.

Soliciting any product or service.

Taking more than one consecutive round trip *

*The agency's policies may vary; check with your local transportation agency.



No arguing, violence, threats, bullying or harassment.



No swearing or mean words about race, gender, age or sexual orientation.



No weapons.



No items that could cause a fire.



No smoking, vaping, illegal drugs or open alcoholic drinks.



No soliciting any product or service.



No open food or drinks. (Lidded drinks are okay.)



No excessive noise or speakers. Use headphones or turn off sound.



No littering or sticking anything out the windows.



No taking more than one seat or putting your feet up.



No exposed body fluids.



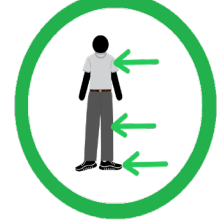
Sit behind the line while bus is moving and keep the aisle clear.



First row seats are for riders who are older, have a disability, or need child seat belts.



Wheelchair tie down areas are reserved for wheelchairs, walkers and mobility scooters.



Riders must be fully clothed and limit odors that disturb others.



Stay in control of your service animal.



Ask driver for help securing large items.



Leave the bus after one loop (unless another partial loop is needed to get where you are going).

These rules are for the safety & comfort of all. Your ride may be denied if you break them.