



AMERICANS WITH DISABILITIES ACT
PARATRANSIT PLAN
CITY OF COLUMBUS, INDIANA

Revised September 2026

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GENERAL INFORMATION

Name of Entity Submitting the Plan:	City of Columbus
Address:	Columbus Transit – Mill Race Station 850 Lindsey Street Columbus, Indiana 47201
Name of Contact Person:	BethAnn Knotts Phone: (812) 376-2506 Fax: (812) 376-2750 E-mail: bknotts@columbus.in.gov
Website:	www.columbus.in.gov

Definition of Complementary Paratransit Service

The Americans with Disabilities Act regulations require City of Columbus, ColumBUS Transit, as a public entity that operates a fixed route system, to provide complementary paratransit services to individuals with disabilities (that is, service that is comparable to the level of service provided to individuals without disabilities who use the fixed route system), see 49 CFR Sec. 37.131 (a).

Americans with Disabilities Act of 1990 and of 2008

The Americans with Disabilities Act of 1990 (ADA) prohibits discrimination and ensures equal opportunity and access for persons with disabilities. It provides the general framework and approach for ending discrimination for persons with disabilities. The stated national goals of the ADA are to guarantee that persons with disabilities have equality of opportunity, a chance to fully participate in society, ability to live independently and be economically self-sufficient.

Section 223 of the Americans with Disabilities Act of 1990 requires that public entities that operate non-commuter fixed-route transportation service also provide complementary paratransit service for individuals unable to use the fixed-route system. The regulations define minimum service characteristics that must be met for this service to be considered equivalent to the fixed-route service it is intended to complement. ADA complementary paratransit standards are provided for in 49 CFR Sec. 37.123 of the Code of Federal Regulations.

In general, the law prohibits public transit systems from denying individuals with disabilities the opportunity to use public transportation services, when they are available. It prohibits public entities from providing services that discriminate against persons with disabilities. The ADA requires the development of programs that will ensure the integration of all persons into the public transportation system, and thus all of the opportunities transportation makes possible. The goal is to ensure non-discriminatory, equitable, accessible and safe public transportation, enhancing the social and economic quality of life for people with disabilities.

Specific actions must be taken by public transit agencies to avoid discrimination. For example, the law requires that:

1. All newly purchased or leased vehicles used in fixed-route service must be accessible to persons with disabilities.
2. Public agencies which provide fixed-route public transportation service also must offer similar complementary paratransit services to individuals with disabilities who are unable to use the fixed-route system.
3. New facilities must be accessible.
4. Alterations to facilities must include features to make them accessible.

City of Columbus, ColumBUS Transit complies with all requirements of the Americans with Disabilities Act.

Service Provided by the City of Columbus, ColumBUS Transit

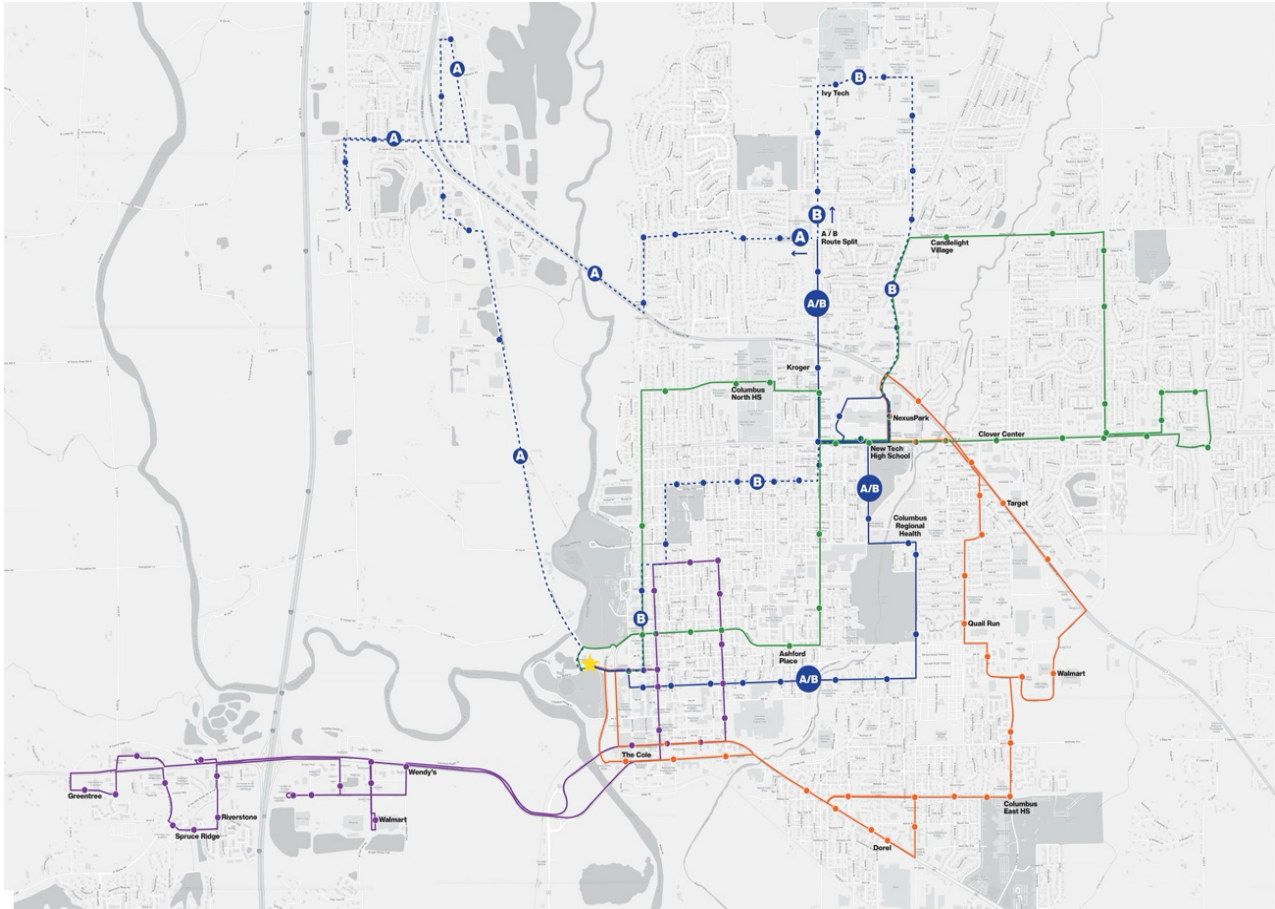
ColumBUS Transit operates fixed-route bus and paratransit services (called Call-a-Bus) from 6:00am to 8:00pm Monday through Friday, and 8:00am to 5:00pm Saturday. ColumBUS Transit refers to its fixed-routes as “loops” and the words are interchangeable as they may appear in this document. The system has a fleet inventory of seven (7) heavy-duty, 30-foot diesel buses for fixed-route operations, and seven (7) 12-passenger converted vans for paratransit service. All vehicles are ADA accessible; thus all fixed routes are wheelchair accessible.

Current fixed-route service includes four (4) loops. These loops have one-hour headways and carry about 242,000 passengers annually.

Call-a-Bus is an “origin to destination” demand-response service that is provided for persons who, because of disability, are unable to access the fixed-route bus service.

Columbus is a fairly compact community. The street network pattern is primarily a grid-system. The four public transit loops have a lengthy configuration. Each of the buses leaves from Mill Race Transit Center, the transfer station near downtown, at five minutes after the hour as a timed-transfer point.

On the map that follows, the four fixed loops are shown in color.



Services Provided by other Entities

Five other organizations were identified as providing some level of paratransit service in the City of Columbus. These are:

- Area XI Agency on Aging – providing transportation for persons over 60 and for those on Medicare going to a medical appointment.
- Development Services Inc. – Provides service to consumers of their agency for work related purposes.
- Head Start – Provides service to low income children to attend Head Start programs.
- Mill Race Center – Service in support of the center.
- Bartholomew Consolidated School Corporation – Provides school bus transportation, including 17 accessible vehicles.

Rules for ADA Eligibility for Complementary Paratransit Services

ADA complementary paratransit service must be provided to all passengers described as being ADA eligible under 49 CFR Sec. 37.123. ADA eligibility includes the following:

1. Any individual with a disability who is unable, as a result of a physical or mental impairment (including a visual impairment), and without the assistance of another individual (except the operator of a lift or other boarding assistance device), to board, ride or disembark from an accessible vehicle in the fixed- route system. Included in this category are individuals with mental or visual impairments who cannot navigate the fixed-route system.
2. Persons who cannot use vehicles without lifts or accommodations. These persons are eligible for paratransit service if accessible fixed-route vehicles are not available on the bus loops in which they need to travel, when they need to travel during operational hours of ColumBUS Transit. (All ColumBUS Transit fixed-route vehicles are accessible).
3. Persons with specific impairment related conditions that cannot travel to a boarding location or from a disembarking location to their final destination. The condition must prevent the person from using the fixed-route system. Conditions that make getting to the fixed-route bus stop “more difficult” do not grant eligibility. Second, architectural barriers (such as no curb cuts) are not under the control of ColumBUS Transit, and environmental barriers (such as distance, terrain, and weather) do not, when considered alone, confer eligibility. If, however, travel to or from a boarding location is impossible when these factors are combined with the person’s specific impairment-related condition, conditional paratransit service will be provided to eligible passengers.

Call-a-Bus ADA Eligibility Certification Process

Applications for Call-a-Bus ADA eligibility for ColumBUS Transit’s complementary paratransit service are available at ColumBUS Transit’s office located at The Mill Race Station, 850 Lindsey Street, Columbus, Indiana 47201 or a request for an application to be mailed can be made by calling the ColumBUS Transit office at (812) 376-2506. Applications are also available for download from ColumBUS Transit’s website located at www.columbus.in.gov by clicking on the “Departments” tab, then on “ColumBUS Transit”. This site also includes hours of operation, holiday schedules, fares, and loop information.

There is a two-part application (see Appendix A) riders must complete before they are allowed to use ColumBUS Transit Call-a-Bus service. The first part is the *Applicant’s Questionnaire* to be filled by the applicant or someone on the applicant’s behalf. The second part is the *Medical Professional’s Verification*, where a medical professional familiar with the applicant answers questions about his or her disability and how it affects the rider’s ability to use fixed loop bus service. ColumBUS Transit uses this information to determine eligibility for using the Call-a-Bus Service.

Once the completed application is received, ColumBUS Transit will notify the applicant within twenty-one (21) days of his/her eligibility status. If a determination has not been made within twenty-one (21) days of receiving the completed application, the applicant will be treated as eligible and will be provided service until ColumBUS Transit determines their eligibility. 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. If the eligibility is limited or denied, ColumBUS Transit will state specifically the reason for the limitation or denial. For visually-impaired passengers, a phone call will be made in addition to the letter.

Incomplete Applications

Under conditions where the applicant satisfactorily shows the *Medical Professional's Verification* cannot be completed in a reasonable time due to protracted appointment dates or other causes beyond the control of the applicant, ColumBUS Transit staff will make a temporary determination regarding eligibility based only on the *Applicant's Questionnaire*. Temporary emergency paratransit status can be granted for up to 30 days, with a possible extension for a person who is newly disabled and needs service or a person who has been disabled but suddenly needs service. ColumBUS Transit will make every effort to provide service while potential patrons attempt to get the medical documentation for eligibility in place.

Types of Eligibility

There will be three (3) types of eligibility: Temporary Eligibility* (see above), Conditional Eligibility, and Full Eligibility. There can also be Temporary Conditional Eligibility. Temporary Eligibility will expire on a specified date determined by ColumBUS Transit staff based on the application information. Full Eligibility is not eternal, but will expire in a maximum of 5 years. A Conditional Eligibility, for example, may allow individuals to take Call-a-Bus trips to certain destinations due to inaccessible infrastructure, where other destinations can be accessed successfully by the individual using the fixed-route system. Certain weather conditions like snow or high temperatures may also determine criteria for Conditional Eligibility.

Eligibility Expiration/Reapplication

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

Eligibility Determination Process

Eligibility will be determined by trained ColumBUS Transit staff and will be based on ADA eligibility standards described in 49 CFR 37.123 and 49 CFR 37.125. Regulation 49 CFR 37.125(a) states, "The process shall strictly limit ADA paratransit eligibility to individuals specified in 37.123 of this part." The Transit Coordinator will review applications to ensure that due process has been observed. The applicant will receive a letter describing their eligibility. If eligibility is denied or limited, the letter will describe why they were denied or provided limited service, and how they can appeal the decision. The letter will be sent in the format requested in the application.

Appeals Process for ADA Eligibility

If the applicant disagrees with the determination, he/she may appeal the decision. The appeals process will be carefully explained to all applicants who are rejected or granted limited eligibility. The following steps will be used to appeal the eligibility determination:

- The applicant will have sixty (60) days to file an appeal with the Director of Transportation, which can be mailed, emailed or presented in person to the ColumBUS Transit Mill Race Station.
- An appeals committee consisting of the Director of Transportation, MPO Director, Director of Human Resources, and a selection of two peer Call-a-Bus passengers will investigate all eligibility appeals. The Director of Transportation may collect additional information as part of the review. The applicant will have the opportunity to be heard in person or may submit all his/her arguments in writing or an accessible format. The appeals committee will have thirty (30) days from the date of the appeal to render a decision. After thirty (30) days, the applicant will be presumed eligible until a decision has been reached. The applicant will be notified by letter, and other methods requested.
- If a customer appeal is denied and the applicant believes the ADA paratransit eligibility process was unfair, the applicant can file a complaint with the Federal Transit Administration Office of Civil Rights, 1200 New Jersey Avenue, SE, Washington D.C. 20590 (866) 377-8642 (Voice) (800) 877-8339 (TTY)

If you are interested in becoming a peer member of the Appeals Committee, please contact the Operations Specialist.

Appeals Process for ADA Eligibility

Visitors not from this jurisdiction may be able to use Call-a-Bus. Visitors who are ADA eligible with another transit system may use Call-a-Bus services. Visitors shall provide ColumBUS Transit with documentation that (1) they are not residents of Columbus, and (2) they are paratransit eligible elsewhere. If they cannot show ColumBUS Transit staff they are eligible elsewhere, but can show sufficiently they are a visitor and are disabled, they may use Call-a-Bus services for up to 21 different days over a 365 day period. If the visitor needs further service, he/she must apply for Call-a-Bus eligibility.

Meeting the Requirements of the Americans with Disabilities Act

Under ColumBUS Transit Paratransit Service Plan, the level of service provided to persons determined to be ADA eligible is similar to ColumBUS Transit's fixed-route bus service. Six service criteria are included in the regulations. The following is a description of how ColumBUS Transit's paratransit service meets or exceeds the service criteria:

Service Area:

ADA complementary paratransit service is provided to all origins and destinations within the service area defined as the city limits of Columbus. For Columbus Transit, the basic service is not only centered on each fixed-route and extending $\frac{3}{4}$ of a mile to either side of the fixed-route, but also includes all areas within the city limits of Columbus. *City limits boundaries are monitored on an ongoing basis.

Response Time:

As stated in the regulations, pick up times will be negotiated with ADA eligible passengers to make scheduling more efficient. As a shared-ride service, Columbus Transit is allowed to negotiate within a one-hour window on either side of the requested pick up time. Any negotiation of time will be discussed with the passenger prior to pick up. The vehicle can arrive up to fifteen (15) minutes before or after the agreed upon time.

Fare Structure:

Fares charged for an ADA eligible complementary service trip to ADA eligible users will be twice the amount of the base cash fare paid by passengers of the Columbus Transit fixed-route system. Fares are currently suspended as of this update.

Trip Purposes:

There are no priorities for trip purpose.

Hours and Days of Service:

ADA complementary paratransit service shall be offered during the same days and hours that Columbus Transit offers fixed-route service. As of the adoption of this Plan, the hours of operation are Monday-Friday 6:00am to 8:00pm, and Saturday 8:00am to 5:00pm. These hours are subject to change without a change to this document.

Hours and Days of Reservation Requests:

Telephone reservation requests are accepted Monday - Friday 8:00am to 4:00pm. Sunday reservation hours are 8:00am to 4:00pm and are taken by a message machine and will be responded to Monday morning. Recorded requests are not guaranteed.

Reservations can be made (fourteen) 14 days before a trip to the day before a trip. No same-day requests will be accepted (see exception below).

Process to Request Same-day Service:

ColumBUS Transit **strongly** encourages scheduling appointments in advance, as same-day requests for service are not always possible. If a request for same-day service is made, the request will be:

1. assessed and prioritized for urgency (for example, medical appointments may be prioritized),
2. the schedule will be assessed to see if the request will be accommodated,

3. staff currently working will be offered additional work hours if that allows for the request to be granted, and
4. staff not working will be notified of an additional option to work.

If there is insufficient staffing, the same-day request cannot be granted. The Operations Specialist will make this determination.

Capacity Constraints:

There are no passenger capacity constraints at this time if riders are able to access entrance utilizing the steps at the front of the bus. The load capacity on the lift at the side entrance of the bus is 1,000 pounds. Call-a-Bus has strict safety and service standards and will conduct a travel training session with any rider with capacity constraint concerns. ColumBUS Transit does not limit the number of Call-a-Bus trips eligible passengers can make.

Personal Care Attendant Policy

Personal Care Attendants (PCA) will be permitted to accompany ADA eligible riders on ADA eligible trips at no charge. ColumBUS Transit will require that passengers state the need for a PCA when they schedule their trip. ColumBUS Transit does not provide PCA's.

One guest will be allowed to accompany an ADA eligible complementary paratransit passenger on their ADA eligible paratransit trip. The PCA is not considered to be a "guest" or companion.

Columbus Transit's Origin-to-Destination Assistance Policy

It is the policy of ColumBUS Transit to provide paratransit services within the City limits of Columbus. Transportation service is provided by ADA accessible buses or vans. To ensure timely service, ColumBUS Transit's paratransit services are considered curb-to-curb. Operators are trained to provide minimal assistance only.

Shopping Trips

To ensure timely service, passengers are encouraged only to bring what they can carry on their own or with the assistance of a PCA.

Pick-up Policies

Call-a-Bus has a 30-minute pick-up window which allows the Call-a-Bus vehicles to arrive at the time of appointment up to thirty minutes after the scheduled pickup time. Passengers must board within 5 minutes of the vehicle that arrive within the 30-minute window. Drivers can leave after waiting 5 minutes if the customer does not appear.

- Passengers will be charged with a "No Show" if they do not board the van within 5 minutes after the van arrives. If the driver has not left after 5 minutes, the customer will still be charged with a "No Show."

- If a No Show is recorded, the 2nd leg of that day's trip will be cancelled.
- If the Call-a-Bus vehicle will be more than 15 minutes late for a scheduled pick-up time, ColumBUS Transit will make every effort to let the Customer know.

Cancellation Policies

To cancel reservations, passengers should notify dispatch as soon as possible as excessive cancellations impact our ability to provide service to all passengers. Ten (10) cancellations within a thirty (30) day period by a passenger will be considered a first offense and will result in the passenger receiving written notification of this policy and their cancellation history. Ten (10) additional cancellations within a subsequent thirty (30) day period of time within six (6) consecutive months will be considered a second offence and may result in the passenger receiving a seven (7) day suspension from use of the service.

Cancelling within one (1) hour of the scheduled time will result in a No Show. The customer may be considered a No Show if:

- No Show – customer does not show up for a scheduled ride
- Late Boarding – Boards more than 5 minutes after the van arrives (van can leave after 5 minutes).
- Not Riding - Chooses not to ride once the van arrives
- Late Cancellation - Cancels the ride within 1 hour of scheduled time

If the customer receives a No Show three (3) times within a thirty (30) day period, they will be notified of this policy in writing. An additional occurrence of three (3) No Shows within a thirty (30) day period of time within six (6) consecutive months will be considered a second offense and may result in a suspension from use of the service. No Shows will not be imposed for circumstances beyond the customer's control.

Passengers will be notified of suspensions in writing in accordance with 49 CFR Section 37.125 of the Department of Transportation (DOT) Americans with Disabilities Act (ADA). A customer may appeal a suspension within ten (10) days of formal notification and will receive a copy of this policy with instructions on how to appeal any suspension in the event a suspension is issued.

Suspensions

In accordance with 49 CFR Section 37.5 (h) of the Department of Transportation (DOT) Americans with Disabilities Act (ADA), it is not discrimination under this part for ColumBUS Transit to refuse to provide service to an individual with disabilities because that individual engages in violent, seriously disruptive, or illegal conduct. However, an entity shall not refuse to provide service to an individual with disabilities solely because the nature of the disability results in involuntary behaviors that may offend, annoy, or inconvenience employees of the entity or other persons.

Suspension Appeals

The customer may appeal suspensions within sixty (60) calendar days of receipt of the suspension letter. Appeals may be initiated by the customer or by another person on the customer's behalf and received by mail or presented in person to the Operations Specialist. The appeal must document the specific reason that the incident was beyond the customer's control or other reasons the appeal should be granted.

The customer will have the opportunity to be heard in person or may submit all his/her arguments in writing or an accessible format. The Committee will issue a response in writing within fourteen (14) calendar days of the receipt of the appeal.

Description of the Public Participation Process

ColumBUS Transit, in an effort to solicit full public participation, has defined a comprehensive public participation process.

The city also solicited the input of persons with disabilities in the development and implementation of the ADA paratransit service through the City's Transit Advisory Committee (TAC) which consists of service agencies and disabled riders that utilize the paratransit service (see Appendix B). The TAC was substantially involved in the development of the paratransit plan. Minutes of related TAC meetings can be found in Appendix C.

The city conducted a public hearing to solicit public comment on this Plan and the changes herein before it was adopted in April of 2013. The Plan is available in hard copy at the ColumBUS Transit Mill Race Station and the City Hall Clerk/Treasurers office, and online. The legal notice, all public notices, and the comments/responses from the Public Hearing and during the public input period are on file with the ColumBUS Transit Compliance Specialist.

Lastly, the City's Board of Public Works will be presented this Plan to adopt at their next public meeting.

End of Document

The revised Americans with Disabilities Act Paratransit Plan for the City of Columbus, Indiana was approved on the _____ day of _____ 2026 by the City of Columbus Board of Public Works. This policy is currently in effective and will continue without interruption.

The expected date of implementation is the _____ day of _____ 2026.

Mary K. Ferdon, Mayor

Eric A. Frey II, Member

Brenda Sullivan, Member

John C. Pickett, Member

Melanie V. Henderson, Member

Attested by:

Luann Welmer, Clerk