

ST. MARY'S COUNTY GOVERNMENT
Department of Public Works & Transportation

TRANSPORTATION DIVISION	POLICY NO: 2
St. Mary's Transit System (STS) ADA Service Compliance	APPROVAL DATE: 1.27.2026
ADA PARATRANSIT/SSTAP POLICY	REVISION DATE: 12.5.2025

Overview

In accordance with the Americans with Disabilities Act ("ADA"), The St. Mary's Transit System ("STS") offers the ADA Paratransit service to approved and eligible riders that are unable to utilize the services offered via the fixed route bus service due to a disability and are approved and eligible to participate in the program. ADA Paratransit service is an origin to destination services designed to be equivalent to fixed route bus service, operating in the same areas and during the same days and hours.

Paratransit service is only required by law to transport riders to and from locations that are within three quarters of a mile of existing local fixed routes and during the same posted times of the fixed route service. STS ensures that this service is provided without capacity constraints according to the relevant Federal Transit Administration regulations.

Points of origin-to-destination beyond the aforementioned three quarter mile sized zone are not eligible for Paratransit service but are eligible for Statewide Specialized Transportation Assistance Program (SSTAP). The SSTAP service provides transportation to riders that have been approved for Paratransit services but live outside of the three quarter mile sized zone if the requested transport satisfies trip time and reservation requirements.

ADA Policy Statement

It is the policy of STS to comply with all the legal requirements of federal and state laws and regulations as they pertain to individuals with disabilities. If state laws and federal regulations are contradictory, federal ADA regulations prevail. STS provides quality transportation services without discrimination for all persons including individuals with disabilities. Discrimination on the basis of disability against any person by STS is strictly prohibited. This policy applies to all STS employees, services, facilities and vehicles. For more information about specific policies regarding the ADA, see STS ADA Policies and Procedures.

Application Process for ADA/SSTAP Paratransit Service

For a rider to apply for ADA/SSTAP Paratransit service, an application must be completed and approved by the STS Paratransit Coordinator. Applications are available for pick-up at the STS Office, 44829 St. Andrews Church Rd., California, MD 20619, telephone request by calling 301-475-4200 ext. 1120, by email request to paratransit@stmaryscountymd.gov, or by visiting the STS website at: <http://www.stmarysmd.com/docs/ParatransitApplication.pdf>.

SSTAP Service

Riders who are not eligible for ADA Paratransit service can be provided paratransit service through SSTAP. This paratransit service provides transportation throughout the County for riders with disabilities and senior citizens to the nutrition sites, medical facilities, and other visits. The hours and service areas are limited to mid-day Monday through Friday, throughout St. Mary's County. Mornings and afternoons are dedicated services to nutrition sites.

The application and process for SSTAP is the same as ADA Paratransit. Once the completed application is submitted, the STS Paratransit Coordinator will review, evaluate, and determine eligibility, whether ADA or SSTAP eligibility duration. Written notification of approval or denial will be mailed within twenty-one (21) days. If approved, an ADA/STS card will be mailed to the applicant.

Service Constraints

- ADA Paratransit: There are no capacity constraints on ADA Paratransit Services. Eligible riders are not denied services for eligible trip requests. STS carries a "standing order" for paratransit trip requests.
- SSTAP: SSTAP Services has service parameter characteristics as described above and are only allowed for up to 50 percent of the total paratransit service capacity. SSTAP riders may be denied services if capacity is constrained.

Right to Appeal

If the rider is denied ADA or SSTAP Services, the rider has the right to appeal their eligibility denial. If the denial is upheld, the applicant will be notified of the denial and the reason for the denial. If the applicant wishes to appeal, he or she may contact STS Administration within sixty (60) days of notification of denial. Correspondence should be sent to 44829 St Andrew's Church Rd., PO Box 409, California, MD 20619. For more information on the Appeals process, see STS Appeals Policies and Procedures.

Eligibility

STS adheres to the standards set forth in 49 CFR § 37.123 regarding ADA/SSTAP Paratransit services. STS ADA/SSTAP Paratransit services aim to be equivalent to fixed route, ensuring accessible transportation options are available for eligible and approved riders.

Eligibility is not based on a diagnosis or type of disability but rather to the current functional ability of riders with disabilities to use fixed route services. While some riders may learn to use the fixed route services independently, actual functional ability at the time of application is the basis for determining eligibility. An applicant's eligibility must be based on the rider's most limiting condition, whether related to the environment or the variable nature of their disability.

The regulations define criteria for determining whether riders with disabilities are ADA/SSTAP Paratransit eligible based on their ability to use fixed route services.

Eligibility is granted when riders cannot board, ride or disembark from accessible fixed route vehicles as a result of their disability, including riders with a cognitive or visual disability, who cannot navigate the system (Although some customers may be trained to navigate parts of the system) and riders with disabilities who cannot stand on a crowded bus when seats are not available. Riders who have specific impairment-related conditions that prevent them from traveling to and from a bus stop.

Eligibility Factors

FTA ADA Circular 4710.1 § 9.3 lays out the following three categories concerning the levels of service provided:

Unconditional: Unconditional eligibility means that a rider is unable to use fixed route transit services under any circumstances and is eligible to make all trips using paratransit. Examples include but are not limited to: Riders who cannot travel independently due to severe or profound intellectual disabilities or dementia, or riders with physical disabilities who have limited functional ability, or riders who have lost their vision late in life and have not learned to travel independently in the community.

Conditional: Sometimes called "restricted eligibility" or "some-trip eligibility," conditional eligibility applies to riders who can independently use fixed route transit services under some circumstances.

Factors for determining eligibility may include, but are not limited to:

- The maximum distance that a rider is able to walk to get to or from a stop.
- Environmental conditions that prevent use of fixed route service (e.g., heat, cold, snow, ice, or air quality).
- Architectural and path-of-travel barriers that prevent use of fixed route service (e.g., lack of sidewalks, lack of curb ramps, uneven or unstable surfaces, or steep hills)
- Types of intersections or streets (e.g., complex intersections, busy streets, or wide streets) that riders cannot reasonably cross safely given their condition.
- Complexity of fixed route trips (e.g., transfers are required)
- Unfamiliar locations (e.g., destinations to which riders have not been successfully trained to travel via fixed route)
- Severe fatigue after receiving treatment, including the potential for experiencing severe fatigue at other times
- Other variable effects of riders' disabilities, such as increased symptoms of multiple sclerosis on certain days

- Time of day (for riders affected by low or bright light or for those who require a seat on the bus to travel and a seat cannot be guaranteed during certain times, such as peak hours)
- Inaccessible fixed route vehicles or facilities (i.e., routes, lines, stations, or stops are not accessible)
- Examples include:
- Riders with intellectual disabilities who have learned how to make certain trips on fixed routes but cannot make all trips independently – They would not be eligible for the trips they have learned to take by fixed route, but would be eligible for all other trips.
- Riders with physical disabilities who can reach a bus stop or rail station within four blocks when the route is accessible – An appropriate condition on eligibility in this instance is “when the distance to or from stops and stations is more than four blocks or when the route to stops and stations is inaccessible.”
- Riders with health conditions who can get to and from stops and stations when the temperature is not too hot (e.g., less than 80°F) or the distance is not too far would be ADA paratransit eligible when the temperature exceeds 80°F or the stop or station is more than four blocks away.

Properly applying eligibility factors means identifying the specific conditions under which each applicant is ADA paratransit eligible and communicating these conditions to the applicant.

Temporary Eligibility

Riders who experience a temporary loss of functional ability that prevents them from using fixed route service may apply for temporary ADA paratransit eligibility for the duration of their treatment period. If the rider has been diagnosed with a temporary disability, the rider will need to renew their paratransit eligibility status prior to expiration date noted on their ADA/STS identification card.

Coordination with ADA Paratransit

STS coordinates transportation with the Department of Aging & Human Services, St. Mary's Health Department, Social Services, and a variety of Mental Health services providing ADA and SSTAP transportation.

Scheduling a Trip or Reservations

Reservations for ADA or SSTAP paratransit can be made during the hours of 8:00am – 5:00pm, Monday through Saturday, up to the day before travel and up to 14 days in advance. There will be no same day appointments made. Response time regulation allows STS to negotiate trip times with eligible riders up to one hour before and one hour after the requested time. For example, if a rider has an appointment and the rider capacity is full, STS can offer the rider a trip one hour earlier or one hour later. When an approved rider calls to schedule a trip, the rider must give the dispatcher the following information:

- The nature of the call (i.e., scheduling an ADA trip)
- The rider's name
- Date of travel
- Pick up time, origin of rider, and destination of the trip
- Return trip information
- Any special assistance that is needed or other considerations
- Whether a companion or PCA (Personal care attendant) will be accompanying the rider.

The dispatcher will provide the caller with an appointment confirmation. If the rider is calling to make an appointment and is directed to voicemail, they can leave a message the day before the appointment, and the trip will be scheduled as requested. Riders are responsible for preparation for their trips. For reserved or recurring trips, the rider should be prepared to board at the beginning of their pickup window time.

Cancellations/No-Show/Lateness

Cancelling a trip. Should a rider be unable to keep his/her scheduled trip with STS, it is the responsibility of the rider to cancel the service at least two hours prior to the scheduled pickup time unless with cause. To cancel a trip, riders must call the dispatcher/scheduler on 301-475-4200 extension 1120. For each circumstance which does not allow the rider to contact the STS dispatch prior to that two-hour pickup, the rider must provide a reasonable explanation for the cancellation within the two-hour frame. Each Cancellation, without cause, will generate one (1) point against the rider.

No-Shows. A No-Show occurs when the STS vehicle arrives at the pickup location within the thirty (30) minute pickup window, waits the required five (5) minutes for the rider and the rider does not board the vehicle or fails to show up. Each No-Show will generate one (1) point against the rider.

Lateness. In order to provide service to as many riders as possible, it is essential that all riders be ready during their scheduled pickup window. There is a five (5) minute wait window beyond the pickup time which the STS driver will wait for the rider. Each incident of lateness will generate one (1) point against the rider.

Suspensions of services:

Riders shall may be subject to the following suspension periods for violations of this Policy that occur within a 30 day period. Riders may be subject to the following suspension periods for violations:

- **First Violation** = No suspension, written warning
- **Second Violation** = 4 points within 30 days = 1 week suspension
- **Third Violation** = 8 points within 60 days = 2 weeks suspension
- **Fourth Violation** = 12 points within 90 days = 4 weeks suspension and loss of subscription service, if applicable
- **Fifth Violation** = 16 points within 120 days = 8 weeks suspension and No Subscription service, if applicable

- **Sixth Violation** = 20 points within 150 days = 12 weeks suspension and No Subscription service, if applicable
- **Subsequent Violations** = More than 20 points within 180 days or more = Termination of Services and the customer must reapply for services to determine eligibility.

If a rider's service is suspended, they have a right to appeal the suspension. For more information on appeals, see STS Appeals Policies and Procedures.

Rider Conduct

All STS Paratransit riders are subject to the same conduct standards and disciplinary measures as riders on fixed-route service. The STS Disciplinary Policy and Rider Code of Conduct applies equally to paratransit trips, including expectations for respectful behavior, prohibitions on disruptive conduct, and consequences for violations.

Out-of-Town Visitors

Out-of-Town Visitors will be eligible for ADA Paratransit services if they are eligible to use the ADA Paratransit provided by their home system. Visitors must provide proof of residence outside of St. Mary's County, as well as an ADA Paratransit certification from their home system. If a visitor's home system does not provide ADA Paratransit certification, other documentation is required to justify the rider's claim to eligibility. Visitors will be provided only 21 days of ADA Paratransit service per a 365-day period. Riders intending to use the service for more than 21 days will be required to apply for eligibility.

Making Reasonable Accommodations

Federal law requires reasonable accommodation be made for riders with disabilities if doing so will not fundamentally alter the nature of any service, program, or activity performed by STS. Determinations whether to grant the requested accommodation will be made on a case-by-case basis.

Personal Care Attendants (PCA)

A PCA is an individual above the age of 14 who travels with the eligible ADA rider to provide assistance in travelling. A PCA must be registered in advance. When scheduling a trip, the rider must inform STS Dispatch if their registered PCA is accompanying them. STS must accommodate registered PCA's.

Companion Riders

A companion rider is an additional individual or individuals who will be accompanying the ADA eligible rider for any reason. When scheduling a trip, the rider must inform STS Dispatch if any Companion riders will be accompanying them. If seating is available, STS dispatch may permit Companion riders. Companion riders shall not be picked up or dropped off at a separate location from the ADA eligible rider's trip.

Planning Requirements

When a fixed route service is changed or a new route is established, Paratransit services shall be reviewed to ensure individuals with disabilities who are unable to use the new or revised fixed route public transportation service are properly served.

ADA Paratransit Services Performance Monitoring

St. Mary's Transit System monitors on-time performance, trips with excessive length, trip denials and missed trips through the scheduling software program. The program records all trip requests, actual and estimated pick up and drop off times, and estimated times of arrival of the riders.