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ADA Overview

- The Americans With Disabilities Act (ADA) of 1990
 - o Originally Signed Into Law on July 26, 1990
 - Five Titles, Modeled, in Part, After the Civil Rights Act of 1964
 - o Substantial Impact on Public Transportation
 - Oversight Split between Multiple Federal Agencies: US DOJ, US DOT, EEOC, FCC

Goals of the ADA

- Equal Opportunity
- Full Participation
- Independent Living
- Economic Self-sufficiency for People With Disabilities

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Reference Documents

- 49 CFR part 27
 - Section 504 of the Rehabilitation Act of 1973
- 49 CFR part 37
 - o U.S. DOT ADA Rules
- 49 CFR part 38
 - ADA Facility and Vehicle Accessibility
- FTA Circular 4710.1
 - o FTA's Program Guidance

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Definition

- Disability
 - A Physical or Mental Impairment That Substantially Limits One or More Major Life Activities of Such Individual
 - o A Record of Such an Impairment
 - Being Regarded as Having Such an Impairment

Definition

- Physical or Mental Impairment
 - Any Physiological Disorder or Condition, Cosmetic Disfigurement, or Anatomical Loss Affecting One or More of the Following Body Systems:
 - Neurological, Musculoskeletal, Special Sense Organs, Respiratory Including Speech Organs, Cardiovascular, Reproductive, Digestive, Genito-Urinary, Hemic and Lymphatic, Skin, and Endocrine
 - Any Mental Or Psychological Disorder, Such as Mental Retardation, Organic Brain Syndrome, Emotional or Mental Illness, and Specific Learning Disabilities

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Definition

- Physical or Mental Impairment
 - The Term Physical or Mental Impairment Includes, But Is Not Limited to, Such Contagious or Non-Contagious Diseases and Conditions as:
 - Orthopedic, Visual, Speech, and Hearing Impairments; Cerebral Palsy, Epilepsy, Muscular Dystrophy, Multiple Sclerosis, Cancer, Heart Disease, Diabetes, Mental Retardation, Emotional Illness, Specific Learning Disabilities, HIV Disease, Tuberculosis, Drug Addiction and Alcoholism

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Definition

- Major Life Activities
 - Functions Such As Caring For One's Self,
 Performing Manual Tasks, Walking, Seeing,
 Hearing, Speaking, Breathing, Learning, and Work

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Modes of Service

- Modes of Transit Service
 - Fixed Route Service
 - System of Transporting Individuals...On Which a Vehicles Operating Along a Prescribed Route According to a Fixed Schedule"
 - Demand Response Service
 - System of Transporting Individuals...Which is Not a Fixed Route System

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Modes of Service

- Modes of Transit Service
- Commuter Bus Service
 - Fixed Route Service Characterized by:
 - Service Predominantly in One Direction
 - Operation in Peak Periods
 - · Limited Stops
 - Use of Multi-Ride Tickets as the Fare Media
 - Routes of Extended Length

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Modes of Service

- Modes of Transit Service
 - Fixed Route Includes
 - Non-Commuter Fixed Route
 - Commuter Fixed Route
 - Intercity Bus
 - Route/Point Deviation When Deviations are Limited
 - Demand Response
 - ADA Complementary Paratransit
 - Route/Point Deviation Open to All
 - Traditional DR (Subscription and Casual DR)

Module 2

NONDISCRIMINATION REQUIREMENTS

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Nondiscrimination

- Prohibited General
 - Refusal of Service Due to Disability
 - o Requiring Use of Seat Belts/Shoulder Harnesses
 - Requiring Use of Body Belts as a Condition of Lift Usage
 - Requiring Passenger with a Service Animal to Disclose Nature of Their Disability
 - Refusing a Passenger with a Disability to Serve as a PCA
 - o Placing Restrictions on Service

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Priority Seating

- Every Vehicle Has Designated "Priority" Seating for Elderly and Passengers with Disabilities
 - But, You Cannot Require These Passenger to Use Those Seats if They Choose to Sit Elsewhere
 - If a Passenger Wants or Needs to Sit in Those Priority Seats and the Seats are Occupied, You Can Ask the Current Seat Occupant to Move, But Do Not Force

Special Charges

- Prohibited from Assessing Any "Upcharge" or Additional Fee to a Passenger with a Disability, Including Wheelchair Users
 - Examples
 - Charges for Longer Boarding/Alighting
 - Wheelchair Stowage
 - Providing Passenger Assistance

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Personal Care Attendants

- Prohibited from Requiring a Passenger Travel with a PCA
 - The Transit Agency May Recommend, but Cannot Require, that a Passenger Travel with a PCA
 - Once Special Condition
 - Passenger Exhibits a Prohibited Behavior (Violent, Seriously Disruptive, or Illegal Action or Poses a Direct Threat to the Health of Safety of Other Passengers
 - Then the Transit Agency May Impose the PCA Requirement in Lieu of <u>Denial of Service</u>

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Insurance Issues

- Prohibited from Refusing Service Due to Insurance Coverage
 - Contrary to the ADA

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Rider Conduct

- Access to Transit is a Civil Right
- Only Limited Circumstance When a Transit Agency Can Deny Service
 - Passenger Engages in the Following Actions
 - Violent
 - Seriously Disruptive
 - Illegal
 - Poses a Direct Threat to Health and Safety of Other Passengers
- Agencies Must Exercise Caution Here

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Rider Conduct

- Best Practice
 - Take Reasonable Attempts to Resolve Rider Issues Before Service Denial
 - Reach Out to Family, Friends, Caretakers, or Social Workers to Facilitate These Attempts
 - Keep Written Records of Your Efforts
- Requirement
 - Afford Due Process (Right to Contest)

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Rider Conduct

 An Entity Shall Not Refuse to Provide Service to an Individual With Disabilities Solely Because the Individual's Disability Results in Appearance or Voluntary Behavior That May Offend, Annoy, or Inconvenience Employees of the Entity or Other Persons

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Complaint Process

- Each Covered Entity Must Establish a Complaint Process
 - o Designated Employee
 - Written Procedures
 - Recordkeeping
 - Prompt and Equitable Resolution of Complaints Alleging Discrimination on the Basis of Disability
- ADA Complaint Process Should be Separate from Service Based Complaints (late, rude driver, etc.)

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Complaint Process

- Designated Employee
 - One Individual Must be Designated to Handle ADA Complaints
 - In Communication to the Public, At the Option of the Transit Agency
 - Can be a Specific Name
 - · Can be a Job Title

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Complaint Process

- The Rule Requires "Adoption of Complaint Procedures"
 - The Process on How to File a Complaint Must be Provided to the Public
 - You Must Provide for the Designated Employee
 - Name
 - Address
 - Telephone
 - Email Address

Complaint Process

- Must be "Sufficiently Advertised," Such as on the Agency's <u>Web Site</u>
 - Highly Recommended
- Procedure Must be Available in Alternative Formats

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Complaint Process

- The Rule Requires "Adoption of Complaint Procedures"
 - o Communicating the Response to the Complainant
 - Regulations Require "Prompt" Response
 - Generally Recommend 30 Days After Receipt
 - While Not Required in Writing, the Documentation Requirements Create a de facto Obligation to Document Its Record of Complaints
 - The agency, however, must communicate its response to the complaint allegations to the complainant and document its response to the complainant in its internal records or database

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Complaint Process

- Recordkeeping
 - Regulations Require "Prompt" Response
 - Generally Recommend 30 Days After Receipt
 - While Not Required in Writing, the Documentation Requirements Create a de facto Obligation to Document Its Record of Complaints
 - All Complaint Documentation Must Be Kept for One Year
 - Summary of Complaint Documentation Must be Kept for Five Years

Complaint Process

- Other Factors
 - $_{\circ}\,$ Prompt Communication on the Agency's Response
 - The Agency's Response Must be in Writing
 - Other
 - Can Be Integrated with Title VI Complaint Process
 - Must Clearly Distinguish in the Complaint Form ADA Complaints from Title VI Complaint
 - Period for Accepting Complaints
 - · Not Specified
 - Recommend 180 days (matches U.S. DOT Practice)

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Reasonable Modifications

- USDOT Published Final Rule on March 13, 2015
 - o Rulemaking Almost 10 Years in the Making
 - o NPRM 2006
- Applies Concept of Reasonable Accommodation to USDOT Covered Entities
 - New Definitions
 - Practice Changes
 - o Effective Date: July 13, 2015

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Reasonable Modifications

- Title II of the ADA
 - State and Local Governments (DOJ)
 - Reasonable Modifications to Policies, Practices, and Procedures Where Necessary to Avoid Discrimination, Unless They Can Demonstrate That Doing So Would Fundamentally Alter the Nature of the Service, Program, or Activity
 - o Public Transit (DOT)
- Title III of the ADA
 - Places of Public Accommodation

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Reasonable Modifications

- DOJ and DOT Have Oversight Responsibilities in Their Respective Sections of Article II
- DOT Contention That Reasonable Accommodation Always Applied to Entities Covered by DOT Rule
- Courts Have Not Always Agreed With that Assessment

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Reasonable Modifications

- This Rule Clarifies That Elements of the DOJ Rules Apply to Public Transit Service Providers
 - o 28 CFR 35.130(b)(7)
- USDOT Issued These Rules So There Is an Explicit Requirement

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Reasonable Modifications

- Applies to
 - Policies
 - Practices
 - Procedures
- Applies When a Change in Policy, Practice, or Procedures Would Avoid Discrimination on the Basis of Disability (e.g., Refusal of Service)

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Reasonable Modifications

- Service Policies Discussion
 - Scheduling
 - o Eating/drinking on board
 - o Passenger assistance
 - Stop notice
 - o Oversized mobility device
 - Standee on lift
 - Other ??? discussion

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Reasonable Modifications

- Exceptions
- Accommodation Would
 - Be a Fundamental Alteration the Nature of the Service
 - Create a Direct Threat to the Health or Safety of Others
 - Passenger is Able to Fully Use the Transportation Entity's Service Without Accommodation

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Reasonable Modifications

- If An Exception Applies, the Entity May Deny Request
- If Denial, Additional Obligations Apply
 - Take Other Actions to Ensure the Disabled Person Receives Transit Service (49 CFR part 37.169(e))
 - Denial of Service Should be Transit Agency's Last Option

Reasonable Modifications

- Entity Required to Establish a Complaint Policy
 - o Designation of Responsible Employee
 - o Name, Address, Telephone Number, and Email
 - Sufficiently Advertised—Web/Other
- No Regulatory Training Requirements
 - Designated Employee is Responsible for Making Decisions That Impacts an Individual's Civil Rights

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Reasonable Modifications

- Although No Training Requirements
 - Should be Trained on ADA/Reasonable Accommodation Rule
 - Should Have Authority to Make Key Operational Decisions

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Service Under Contract

- Public Agencies
 - Subawards/Contracts
 - The Subawardee or Contractor Must Meet the Requirements Applicable to the Public Agency

Module 3

EQUIVALENCY STANDARDS FOR DEMAND RESPONSE SERVICES

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Demand Response Operations

- Key Distinction
 - A Passenger Must Interact With the Transit System in Order to Use the Service
- ADA Service Requirement for Demand Response Services
 - Equivalent Service in the Most Integrated Setting
 - Door to door service as requested/needed
 - · No requirement for door through door

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Demand Response Operations

- Equivalent Service
 - o Seven (7) Criteria
 - Response Time
 - Fares
 - Geographic Area of Service
 - Hours And Days of Service
 - Restrictions or Priorities Based on Trip Purpose
 - Availability of Information and Reservations Capability
 - Any Constraints in Capacity or Service Availability

Defining Equivalency

- Equivalent Service
 - Unlike Complementary Paratransit, There Are No Service Standards Associated With These Criteria
 - Obligation is Only to Provide Equivalent Service Good or Bad
- While Acquisition of Accessible Vehicles is Recommended, When Service is Equivalent, Non-Accessible Vehicles May Be Purchased
 - o Certification Must Be Submitted to the NHDOT

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Defining Equivalency

- Response Time
 - The Time Between the Request for Service and Provision of Service is the Same for All Passengers
- Fares
 - The Any Given Trip, the Fare is the Same for Passengers with Disabilities as the Fare for Passengers Without Disabilities

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Defining Equivalency

- Service Area
 - Riders with Disabilities are Able to Request Trips in the Same Area or Areas as Other Riders
- Hours and Days
 - Riders with Disabilities are Able to Request Trips on the Same Days and During the Same Hours as Other Riders

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Defining Equivalency

- Trip Purpose Restrictions
 - If Trip Purpose Restrictions, the Same Restrictions Apply to All Riders
- Availability of Information and Reservations Capability
 - Information Provided to the Public Must be Available in Alternative Formats
 - o Telecommunications Access Also Must be Provided
 - Rely NC, 711, etc.

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Defining Equivalency

- Constraints on Capacity
 - o Same Constraints Applicable to All Riders
 - Unlike Complementary Paratransit, Trip Denials are Permitted on Demand Response Systems
 - First-Come, First-Served Reservation Policies are Permissible
 - To be Considered Equivalent, Riders with Disabilities Would Encounter Trip Denials with the Same Frequency as Riders Without Disabilities

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Defining Equivalency

- Monitoring for Equivalency
 - Recommended Procedures
 - Periodically Review Trip Denials
 - Calculate the Percentage of Trips Requested by Riders Who Require Accessible Vehicles That Were Denied
 - » Denied Trips Requested by Riders Who Need Accessible Vehicles Divided by the Total Trips Requested by Riders Who Need Accessible Vehicles
 - Compare This With The Percentage of Trips Requested By Riders Who Do Not Need Accessible Vehicles That Were Denied

Demand Response Operations

- Public Entities Must Acquire Accessible
 Vehicles Meeting the Requirements of 49 CFR
 § 38
- If Service is "Equivalent," a Public Entity Can Purchase a Non-Accessible Vehicle
 - Section 5311-Funded Agencies Must Certify to the State DOT Service Equivalency
 - Burden of Proof on the Public Agency

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Demand Response Operations

- Equivalent Service
 - When a Demand Response Fleet is 100 Percent Accessible, FTA States the Equivalent Service Standard Applicable to Demand Response System Do Not Apply
 - Presumptive Equivalency

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Demand Response Operations

- Route Deviation
 - Must Accept Deviation Requests From All Riders to be Considered Demand Response
 - Must Advertise the Availability of Route Deviations in Schedules and Other Public Information

Demand Response Operations

- Route Deviation
 - Restrictive Practices
 - No Excessive Fares for Deviations
 - Limiting the Areas Where Deviations Can Occur
 - Limiting Deviations to Specific Trip Purposes
 - Capping the Number of Deviations an Individual Can Request
 - Limiting Number of Deviations Per Run

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Module 4

GENERAL REQUIREMENTS MODIFICATIONS

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Maintenance of Accessibility Features

- Operative Condition
 - Routine Preventive Maintenance is Required for a Vehicle's Accessibility Features/Functions
 - Lifts/Ramps
 - Securement Devices
 - Signage
 - Annunciators
 - PA Systems
 - o "Prompt" Repair Required

Maintenance of Lifts

- System of Regular Maintenance Checks of Lifts/Ramps
- Immediate Reporting of Out-of-Service Lifts
 - Vehicle Must be Removed from Revenue Service Before the Next Service Day
 - If No Accessible Vehicle Available
 - Vehicle May Remain in Service for No More Than Three Days in Urban Areas
 - Vehicle May Remain in Service for No More Than Five Days in Urban Areas

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Lift and Securement Use

- Securement
 - Agencies May Not Deny Transportation to a Wheelchair User on The Ground That the Device Cannot be Secured or Restrained Satisfactorily by the Vehicle's Securement System

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Lift and Securement Use

- Mobility Devices Defined
 - 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

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Lift and Securement Use

- Mobility Devices
 - The Previous Definition of a "Common Wheelchair" was Eliminated More than 10 Years Ago
 - Transit Agencies Must Transport Individuals Using Wheelchairs If Their Devices Meet the Definition of a Mobility Device and Can be Accommodated on the Vehicle
 - They Fit on The Lift Or Ramp And In The Securement Area)

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Lift and Securement Use

- Mobility Devices
 - The Transit Agency May Require that the Mobility Device be Secure Using Securement Hardware
 - The Transit Agency May Require that the Mobility Device be Transported in Only Designated Securement Locations
 - The Transit Agency May <u>Request</u>, But <u>Cannot</u> <u>Require</u> a Passenger to Transfer From a Mobility Device to a Vehicle Seat

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Lift and Securement Use

- Standees
 - Transit Agencies Must Permit Individuals with Disabilities, Including Standees, Who Do Not Use a Wheelchair to Board/Alight the Vehicle Using the Lift

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- Accommodating Other Devices
 - Agencies Are Not Required to Permit Other Types of Assistive Devices to be Used In Ways That Depart From or Exceed Their Intended Uses
 - Agencies Are Not Required To Permit Riders Who Use Walkers With Built-in Seats To Ride In Securement Areas While Seated on Their Walkers
 - You Can Require These Individuals to Transfer to a Vehicle Seat

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Provision of Service

- Other Passenger Assistance
 - o Boarding/Disembarkment
 - Fare Payment Assistance Yes (But Not Required to Reach Into Purses, Pockets, etc.)
 - Personnel Care Attendants
 - While Only Noted in Sections on Complementary Paratransit, All Modes Should Permit PCAs to Ride for
 - ∘ Luggage and Packages Not an ADA Requirements
 - Use Sound Local Policies

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Provision of Service

- Portable Oxygen
 - Must Allow Travel With a Respirator or Personal Oxygen Supply, Consistent With Applicable USDOT Rules Regarding Transport of Hazardous Materials

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- Service Animals
 - o Difference in USDOT Regulation from USDOJ
 - Service Animals Are Individually Trained to Work or Perform Tasks
 - · Service Animals Are Not Pets
 - May Ask If an Animal is a Service Animal
 - May Ask What Tasks the Animal Has Been Trained to Perform
 - · Cannot Require Special ID Cards or Harnesses for the Animal
 - · Cannot Ask About the Person's Disability
 - Allergies and Fear of Animals Are Not Valid Reasons For Refusing Service
 - · Animal Must be Under Control of Passenger

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Provision of Service

- Accessible Information
 - All Materials Necessary for a Customer to Use the Service (e.g., Schedules, Route Brochures, User Guides) Must be Available in Alternative Format
 - Information on How to Access Such Material
 Should be Clearly Printed on All Such Documents
 - No Single Format Prescribed Use a Format the Individual with Disabilities Can Use

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Provision of Service

- Accessible Information
 - Although USDOT Rules Do Not Specifically Mention Accessibility of Web Sites, FTA Urges Transit Systems to Refer to DOJ Guidance, "Accessibility of State and Local Government Websites to People with Disabilities"

https://www.ada.gov/websites2.htm

- Alternative Telecommunications
 - System Must Have Means of Providing Telecommunication Access to Persons with Speech and Hearing Disabilities
 - Providing Accessible Information Includes Offering Alternatives to Voice Telephone Communications, Such as Using (and Having Appropriate Personnel Trained to Use) the National "711" Relay Service

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Provision of Service

- Alternative Telecommunications
 - Your Obligation Can Be Met by Using Dedicated Equipment Such as Telecommunications Devices for the Deaf (TDDs) or Other Advanced Technologies People With Speech or Hearing Disabilities Use

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Provision of Service

- Training Personnel to Proficiency
 - Training To Proficiency Means That, Once Trained, Personnel Can Consistently and Reliably Operate Accessibility Features, Provide Appropriate Assistance to Individuals With Disabilities
 - o Treat Riders in a Respectful and Courteous Way

- No Show/Late Cancellation
 - o Percent of trips over a defined period of time
 - Consistently enforced
 - Within the rider's control
 - Be a pattern of behavior
 - Notice to Rider prior to suspension of service
 - Progressive action
 - Appeal process
 - Make reasonable attempt to correct issue(s)
 - Demand response can charge no show fee however this is not considered a best practice.

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Training

- Training Personnel to Proficiency
 - Training To Proficiency Means That, Once Trained, Personnel Can Consistently and Reliably Operate Accessibility Features, Provide Appropriate Assistance to Individuals With Disabilities
 - Operators
 - Customer Service Representatives
 - Other frontline staff
 - o Treat Riders in a Respectful and Courteous Way

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Module 5

COMPLIANCE VS. BEST PRACTICE

Web Site Content

- This Module Will Address ADA Web Site Requirements
- There is Significant Confusion on This Issue, in Part, Due to Similarities to Title VI Requirements

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Web Site Content

- ADA Complaint Procedures
 - Must be "Sufficiently Advertised to the Public, Such as on the Entity's Web Site"
 - The Language is a Suggestion, Not a Requirement
 - However, this "Suggestion" Represents a <u>Best Practice</u>
 - Therefore, it is Recommended the Following Should be on Your Web Site:
 - » Complaint Filing Procedures
 - » Name, Address, Telephone Number, and Email Address of the Designated Employee (to Handle ADA Complaints)
 - » Complaint Form
 - Basis
 - 49 CFR § 37.17(b)(1)

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Web Site Content

- ADA Compliant Web Sites
 - ADA Regulations Require that System Information be Available in Alternative Formats
 - FTA Has Opined that Web Sites are the Primary Source of Information for Most Transit Riders But Acknowledges that U.S. DOT Regulations Do Not Address Web Site Accessibility
 - o FTA "Suggests" Entities Embrace DOJ Guidance
 - Basis
 - 49 CFR § 167(f), FTA Circular 4710.1, Chapter 2.8.2

Web Site Content

- Reasonable Modification
 - The Public Entity <u>Shall Make Information About How to</u> Contact the Public Entity to Make Requests for Reasonable Modifications Readily Available to the Public Through the Same Means It Uses to Inform the Public About Its Policies and Practices
 - Basis
 - 49 CFR § 169(a)(2)

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Web Site Content

- Reasonable Modification
 - In This Case, Use of the Term "Shall" Means It is a Requirement
 - o Agencies Must Include on Their Web Sites
 - Description of How to Contact the Public Entity to Make a Request for Reasonable Modification
 - Procedures on What Information Must be Provided About the Requested Modification
 - Best Practice
 - Internal Procedures for the Review and Processing of Requests
 - Basis
 - 49 CFR § 169(a)(2)

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Web Site Content

- Best Practices for Web Site Content
 - Presented Here as Individual Topic Content, These Topics (in Some Instances) Can be Combined
 - o Rider's Guide
 - Transit System Brochure with Descripting Information on the Service and How to Reserve Trips on the Service
 - Trip Cancellation Polices/Late Cancellations
 - Rider Conduct Rules
 - No-Show and Suspension Policies (if Applicable)
 - Due Process Procedures to Dispute Suspensions

Web Site Content

- Best Practices for Web Site Content
 - General Service Policies
 - Advance Reservation Requirements
 - Next-Day
 - 24-Hour
 - Other
 - Pick-Up Windows
 - · Ready Time Around the Scheduled Pick-Up Time
 - Usually Expressed +/- Minutes
 - » -10/+20 Would Mean Someone Schedule for an 11:00 AM Pick-up Should be Ready Between 10:50 and 11:10

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Web Site Content

- Best Practices for Web Site Content
 - General Service Policies
 - Dwell Time Policies
 - Typically, Five Minutes
 - PCA Policies
 - Service Animal and Pet Policies
 - Passenger Assistance Policies
 - No-Show and Suspension Policies (if Applicable)
 - Due Process Procedures to Dispute Suspensions
 - Lift/Ramp Capacities

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Web Site Content

- Department of Justice Website Requirements
 - Mandate compliance with specific web accessibility standards under Title II of ADA Act
 - Effective April 26, 2027 for rural transit
 - Final rule effective June 2024 urban systems already required to comply
 - WGAG 2.1 Level AA accessibility standards
 - $\circ~\underline{www.\text{ADA.gov}}$ Fact Sheet issues April 2024

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• Ask Any Questions You May Have on the ADA

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