



March 30, 2020

To: Transit Agencies, Labor Unions and other Transportation Providers
CC: US Department of Transportation
From: Access Living, American Council of the Blind, American Foundation for the Blind, Autistic Self Advocacy Network, Disability Rights Education and Defense Fund, National Association of the Deaf, Rooted in Rights, The Arc of the United States
RE: Implementing New COVID-19 Policies for People with Disabilities

Dear Transportation Providers and Stakeholders,

This time of uncertainty is hard on us all, but for some people with disabilities new transportation policies may create unintended barriers to travel. Disability advocates understand the need to implement rear door boarding and other policies in response to COVID-19, and in line with the NCHRP public transportation pandemic guide.¹ We offer as an addendum a list of recommendations to share with transit agencies, local unions, and drivers in hopes that we can all stay safe, healthy and continue to travel when necessary. We also encourage you to seek the guidance of your local disability advocates and accessibility advisory committees to help ensure nondiscrimination. We are grateful for transportation providers, are advocating for necessary transportation funding and PPE, and offer our support during and after the pandemic.

Signage for Passengers with Disabilities

For rear boarding policies and other potential changes, we recommend agencies supply a single-sheet paper sign or flyer attached to the front doors of the bus directing passengers to the rear door, but noting the availability of the wheelchair ramp for those needing such. The sign/flyer should be written using very simple language,² and with at least two pictures on it showing ambulatory passengers (using readily identifiable imagery) that they cannot use the front door and should board in the back.

For example:

An image of a stick figure person going toward the bus front doors with a red "X" over the doors, and an image of a stick figure person going toward an image of the rear bus doors, with a green checkmark.

For Passengers with Physical Disabilities, Including Walker and Wheelchair Users

Wheelchair users and others with limited mobility will need to retain front door boarding and access. We ask that the following procedures be adopted to accommodate these users:

- Installation of a safety strap or other temporary barrier to prevent the use of front seats by passengers other than those in a wheelchair, scooter, walker, or similar mobility device.³
- Development of protocol for assisting passengers with wheelchairs upon request; and adequate gloves, wipes, hand sanitizer and masks for operators and agency staff where needed to assist safely with wheelchair securement if securement is requested by wheelchair-using passengers.

For Passengers with Sensory Disabilities

If passengers are not aware of the new policy, a sign on the front door is very helpful but may not be sufficient to communicate changes to boarding procedures.

- Print signage in large letters with sufficient contrast in conspicuous locations.
- Announce changes to the boarding policy through available audible announcements on buses or at stops.
- Encourage drivers to remain patient with passengers who may not know or understand the new procedures, and may not have an obvious disability. A longer wait period may be needed at each stop so blind and visually impaired passengers can find the correct door.
- Widely communicate the new policy to the public through accessible media.

For Passengers with Intellectual or Developmental Disabilities

Some people with intellectual and developmental disabilities may find it particularly challenging to be forced outside of the usual routine and face constant changes. It's important that a person who comes to the front entrance not automatically be perceived as non-compliant or a threat.

- Some people may have more difficulty understanding the new policies.
- Use a variety of approaches to communicate the new boarding policy, e.g., verbal directions, signs at both the front and rear doors, simple language, and visual representations.
- Communicate directly with the individual, and secondarily to support providers that may accompany the individual.
- Verbal directions should be concise.
- Be patient with people who may need more time, where possible. Remind drivers that not all disabilities are obvious.

Finally, these recommendations reflect a working draft. Please send any best practices that we should highlight and share with our members. Do not hesitate to reach out to Carol Tyson at ctyson@dredf.org with any questions or comments.

¹ NCHRP Report 769: A Guide for Public Transportation Pandemic Planning and Response (2014). Found at: <https://www.nap.edu/catalog/22414/a-guide-for-public-transportation-pandemic-planning-and-response>

² Simple language should be consistent with the Plain Writing Act and federal government Plain Language standards found at <https://www.plainlanguage.gov>

³ King County Metro has implemented use of a safety strap. Please see their website for a description and photo: <https://kingcountymetro.blog/2020/03/26/covid-19-update-new-safety-strap-to-support-health-of-drivers-and-customers-through-social-distancing/>