



Rider Code of Conduct Policy

Effective September 22, 2026

Purpose

CTN is committed to providing safe, respectful, reliable transportation. The purpose of this Rider Code of Conduct is to provide safe, respectful, reliable, and nondiscriminatory transportation while protecting riders, drivers, attendants, other passengers, caregivers, facilities, the public, and CTN property.

Scope

This policy applies to:

- All riders/passengers
- Riders' companions, personal care attendants, escorts, caregivers, guardians, or representatives while interacting with CTN or other utilizing CTN's services.
- Conduct occurring during scheduling, dispatch calls, pick-up, transport, drop-off, facility interactions, complaint/appeal communications, or any other CTN-related service contact.

Nondiscrimination, ADA, and Title VI Compliance

CTN will administer this policy in a nondiscriminatory manner.

CTN will not deny, limit, suspend, or terminate service on the basis of disability, race, color, national origin, limited English proficiency, religion, sex, age, income status, or any other status protected by applicable law or CTN policy.

CTN will provide reasonable modifications of policies, practices, or procedures when necessary to allow a rider with a disability to use CTN services, unless the requested modification would fundamentally alter the service, create a direct threat to the health or safety of others, or is not necessary for the rider to use the service. Public transportation reasonable-modification rules require an accessible process for modification requests and allow denial only for limited reasons such as fundamental alteration, direct threat, or lack of necessity; DOJ Title III rules likewise require reasonable modifications unless they would fundamentally alter the public accommodation's goods or services.



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Rider Expectations

Riders and their representatives are expected to:

- Treat drivers, staff, other riders, facility staff, and the public with respect.
- Use respectful language and avoid abusive, profane, threatening, harassing, or discriminatory comments.
- Follow driver and dispatch safety instructions.
- Remain seated and properly secured while the vehicle is moving.
- Use seatbelts, securement systems, mobility-device securement, and other safety equipment as required for safe transportation and consistent with law.
- Avoid interfering with the driver, vehicle controls, doors, ramps, lifts, securements, or emergency equipment.
- Avoid conduct that delays, disrupts, or prevents safe service.
- Avoid damaging CTN vehicles, property, equipment, or another person's property.
- Avoid possessing or displaying weapons in a manner prohibited by law, contract, facility rule, or CTN safety requirements.
- Avoid behavior that creates fear, intimidation, or danger for others.
- Provide accurate trip and contact information.
- Notify CTN of known needs that may affect safe transportation, including mobility assistance, communication needs, caregiver/escort needs, or reasonable modification requests.

Prohibited Conduct

- Rudeness or disrespectful conduct that is repeated, severe, or disruptive.
- Abusive, profane, hostile, or degrading language.
- Harassment, bullying, intimidation, or discriminatory slurs.
- Threatening language, gestures, or actions.
- Violence or attempted violence.
- Unwanted physical contact.
- Throwing objects, spitting, striking surfaces, banging on windows, or similar unsafe actions.
- Interfering with the driver or safe operation of the vehicle.
- Grabbing or attempting to grab the driver, steering wheel, keys, controls, doors, lift, ramp, securements, or equipment.
- Refusing safety instructions, including remaining seated or properly secured.
- Leaving a seat or mobility device position while the vehicle is moving.
- Damaging, defacing, soiling, or tampering with CTN property or another person's property.



- Unsafe conduct related to oxygen, medical equipment, mobility devices, bags, or personal items.
- Possession, display, or use of a weapon.
- Illegal conduct during CTN service.
- False reports, misuse of CTN services, or repeated conduct intended to disrupt scheduling or service.
- Any other conduct CTN reasonably determines creates a safety risk, service disruption, or hostile environment.

Driver and Dispatcher Response

CTN staff should respond based on the severity and immediacy of the situation.

All conduct incidents that may result in discipline must be documented. Documentation should include:

- Rider name and trip details.
- Date, time, pickup/drop-off location, vehicle, driver, and dispatch staff involved.
- Description of conduct using objective facts, not labels or assumptions.
- Safety risk observed.
- Witnesses, video/audio/GPS/dispatch notes if available and lawfully retained.
- Whether a disability-related explanation or reasonable modification request was known or raised.
- Steps taken to de-escalate, accommodate, modify, or safely complete the ride.
- Whether emergency services, facility staff, broker/payer, caregiver, or case manager were contacted.
- Recommended follow-up.

CTN will review relevant records and interview appropriate persons before issuing written warnings, suspensions, or terminations when feasible. CTN's complaint policy already requires intake, documentation, accessibility/meaningful access, immediate safety triage, classification, investigation, corrective action, outcome communication, record retention, and quarterly trend review.



Progressive Consequences

Progressive action is preferred when appropriate but CTN need not use every level or use levels in sequence. No employee is required to remain in an unsafe situation.

Step	When Used	Consequence	Required Safeguards
1. Verbal Warning	First minor or moderate incident, or when education is likely to resolve the issue	Staff explains the conduct concern, expected behavior, and consequences for recurrence	Document the warning in the rider record. Consider disability-related factors and communication needs.
2. Written Warning	Repeated misconduct, serious first incident, or failure to correct after verbal warning	Written notice describing the conduct, policy violated, expected behavior, and next consequence	Include ADA/reasonable modification contact, Title VI/civil rights complaint contact, and opportunity to respond.
3. Suspension	Repeated misconduct, serious misconduct, unsafe conduct, or failure to comply after warning	Temporary suspension or service limitation for a reasonable period or until safety conditions are met	Provide written notice, reason, length/conditions, ADA/Title VI review, and appeal rights. Non-safety suspensions may be stayed during timely appeal.
4. Termination of Service	Repeated serious misconduct, failure of suspension/conditions to resolve conduct, or substantiated egregious misconduct	Termination of CTN services, with possible reinstatement review if conditions change	Written decision, ADA/Title VI review, appeal rights, record retention, and coordination with broker/payer/case manager when applicable.

The sequence may be adjusted based on severity, frequency, intent, safety risk, prior history, whether reasonable modifications were effective or available, and whether the behavior was disability-related.



Immediate Termination for Egregious or Dangerous Conduct

Egregious or Dangerous actions may result in immediate termination of service without prior verbal warning, written warning, or suspension.

Examples include but are not limited to:

- Violence or attempted violence.
- Credible threats of harm.
- Serious intimidation or threatening conduct.
- Conduct that creates a direct threat or serious safety risk.
- Weapon-related incidents where prohibited or unsafe.
- Intentional interference with safe vehicle operation.
- Grabbing the driver, steering wheel, controls, doors, lift, ramp, securements, or emergency equipment.
- Serious property damage.
- Illegal conduct during CTN service.
- Severe misconduct that makes continued service unsafe.

When immediate termination is considered, CTN may place the rider on an immediate service hold while management conducts a prompt safety and compliance review. If the egregious conduct is substantiated, CTN may terminate service immediately. The rider will receive written notice and appeal rights. If the conduct may be disability-related, CTN will still consider whether a reasonable modification or support plan could eliminate or reduce the risk, unless the risk is immediate, severe, or cannot be safely mitigated.

Conditions for Continued or Reinstated Service

When appropriate, CTN may offer conditional service instead of suspension or termination, or as a condition of reinstatement. Conditions may include:

- A rider conduct agreement.
- Pre-trip communication plan.
- Required caregiver, guardian, facility contact, or authorized support person coordination, where legally permissible and necessary for safety.
- Modified pickup/drop-off instructions.
- Alternate communication method.
- Safety seating or securement plan.
- No shared ride when operationally feasible and necessary for safety.
- Additional staff review before scheduling.



- Payment for intentional property damage, where allowed by law and contract.
- Demonstrated period without further misconduct.

CTN will not require an attendant or support person solely because a rider has a disability. Any such requirement must be based on individualized safety facts and only when CTN could otherwise lawfully refuse service because the rider cannot be safely transported without the support.

Appeals Process

A rider may appeal a written warning, suspension, termination, service hold, or condition of service.

How to appeal: The rider or representative may appeal by phone, email, mail, in person, or any accessible method accepted by CTN. A specific form is not required.

Deadline: Appeals should be submitted within **10 business days** of the written notice. CTN may extend this deadline for good cause, disability-related reasons, language-access needs, hospitalization, lack of notice, or other fairness reasons.

Access and accommodations: CTN will provide reasonable accommodations, accessible formats, relay support, and language assistance at no cost when needed. ADA transportation rules require complaint procedures to be accessible and usable by individuals with disabilities and to include due process standards; FTA Title VI guidance requires complaint procedures/forms and LEP meaningful access.

Reviewer: The appeal will be reviewed by a manager, committee, or designee who was not the sole decision-maker for the original action whenever feasible. ADA paratransit appeal rules require an opportunity to be heard, a decision by someone not involved in the initial denial, and written notice of the decision and reasons; FTA's public FAQ describes the same core appeal protections.

Opportunity to be heard: The rider may submit written information, documentation, witness statements, disability-related information, reasonable modification requests, safety plans, or other evidence. The rider may request a meeting by phone, video, or in person.

**Service during appeal:**

- For non-dangerous conduct, a timely appeal will generally stay a suspension or termination until the appeal decision is issued.
- For egregious conduct, violence, credible threats, direct threats, or serious safety risks, CTN may keep a service hold, suspension, or termination in effect during the appeal to protect safety.

Appeal decision: CTN will issue a written decision within 10 days of the appeal stating whether the action is upheld, modified, reversed, or returned for further review. The decision should explain the reasons, any service conditions, reinstatement steps, and any remaining complaint rights.

External complaints: Nothing in this policy prevents a rider from filing an ADA, Title VI, civil rights, Medicaid, broker, payer, or other complaint with CTN or an outside agency. FTA states that ADA and Title VI recipients must have local complaint procedures and that individuals may also file administrative complaints with FTA within applicable time.

Disability-Related Conduct Review

A rider will not be disciplined, suspended, or terminated for conduct that is directly related to a documented disability unless the conduct:

- Creates a direct threat or significant safety risk;
- Is violent, seriously disruptive, or illegal;
- Prevents CTN from safely operating the vehicle or providing the ride;
- Places the driver, rider, another passenger, facility staff, public, or property at risk; or
- Cannot be reasonably mitigated through a reasonable modification, support plan, or other safety measure.

Before imposing suspension or termination, CTN will conduct an individualized review when CTN knows or has reason to know the conduct may be disability-related. This review should consider:

- Whether the conduct is connected to a documented or otherwise substantiated disability.
- Whether the conduct was involuntary, communication-related, sensory-related, cognitive-related, behavioral-health-related, or otherwise disability-related.



- Whether the conduct merely offended, annoyed, or inconvenienced others versus actually disrupting service or creating safety risk.
- Whether reasonable modifications, supports, communication adjustments, scheduling changes, rider education, involvement of a caregiver/case manager, or other measures could allow safe continued service.
- Whether the rider can comply with basic safety requirements with support.
- Whether the risk is based on objective evidence and specific facts.

CTN may request limited documentation when the disability-related basis or requested modification is not obvious. CTN will keep disability-related information confidential and use it only for safety, service, accommodation, investigation, appeal, or legal compliance purposes.

No Retaliation

CTN prohibits retaliation against any rider, representative, caregiver, employee, driver, witness, or other person who submits a complaint, requests an accommodation, files an appeal, participates in an investigation, or raises a civil rights concern in good faith.