



# ADA & Paratransit Policy

Revision Date: 01/01/2025

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## Change Log

| Date          | Section | Description                   |
|---------------|---------|-------------------------------|
| December 2024 | Various | Update from WSDOT<br>Template |

## Americans with Disabilities Act (ADA) Information

The following is required general information about Valley Transit, the entity responsible for the provision of ADA Paratransit services as described in this plan.

Valley Transit is committed to providing equal access to its facilities, programs, and services for persons with disabilities. This material can be made available in an alternate format by emailing Vicki Croes, HR Manager at [vicki@valleytransit.com](mailto:vicki@valleytransit.com) or by calling 509-525-9140. People who are deaf or hard of hearing may make a request by calling the Washington State Relay at 711.

## Acronyms and Abbreviations

|       |   |
|-------|---|
| ADA:  | Americans with Disabilities Act               |
| CFR:  | Code of Federal Regulations                   |
| FTA:  | Federal Transit Administration                |
| OECR: | WSDOT Office of Equity and Civil Rights       |
| RTAP: | Rural Transit Assistance Program              |
| WLAD  | Washington's Law Against Discrimination       |
| WSDOT | Washington State Department of Transportation |

# Definitions

Occasionally, demonstration of compliance, such as with the Americans with Disabilities Act (ADA) requires the use of a specific term. Due to the unavoidable use of industry jargon, the following is a list of common definitions for terms you may encounter:

- **Americans with Disabilities Act:** Typically abbreviated to ADA, this act was signed into law in 1990. This landmark federal legislation requires that persons with disabilities receive transportation services equal to those available on the Fixed Route service(s).
- **Day in Advance:** Day in Advance refers to the passenger's obligation to schedule a Paratransit ride the day previous to their intended trip.
- **Disability:** With respect to an individual, a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment.
- **Eligibility:** Eligibility is the process by which a passenger can apply to receive Paratransit/Dial-A-Ride services.
- **Equivalence:** Equivalence generally refers to a provider's obligation to run Paratransit/Dial-A-Ride services during the same schedule as the Fixed Route(s) it compliments. It is also occasionally used to express a provider's obligation to provide enough capacity (drivers and vehicles) to meet the needs of eligible riders who made reservations a day in advance.
- **Fixed Route:** A Fixed Route Public Transit System runs on a defined path at a set schedule without deviation from that route.
- **Functional Assessment:** A functional assessment is an evaluation of a Paratransit applicant's ability to use a Fixed Route vehicle. Performed by a trained professional, these assessments are ordered when staff is unable to make a clear finding of eligibility based on the contents of a prospective Paratransit rider's application.
- **Missed Trips:** A missed trip is defined by any of the following:

- a. The vehicle arrives and leaves before the beginning of the pickup window without picking up the rider and without any indication from the rider that he or she no longer wants to make the trip
  - b. The vehicle does not wait the required five minutes within the pickup window, there is no contact with the rider (or attempted contact), and the vehicle departs without the rider
  - c. The vehicle arrives after the end of the pickup window and departs without picking up the rider (either because the rider is not there or declines to take the trip because it is now late)
  - d. The vehicle does not arrive at the pickup location
    - o Our goal is zero missed trips
- **Mobility Device or Aid:** A device designed to assist an individual with disabilities with locomotion. Examples include wheelchairs, canes, crutches, and walkers.
  - **Origin-to-Destination:** Origin-to-destination is the ADA standard for pick-up and delivery. A full discussion can be found on page 15.
  - **Paratransit:** Also referred to as Dial-A-Ride or Complementary Paratransit, refers to a provider's obligation under the ADA to offer an equivalent mobility alternative for people who are prevented from using Fixed Route services due to a disability.
  - **Reasonable Modification:** A clear verbal or written request for a change in service delivery that will make the service more accessible for the rider that **does not** cause a direct threat to the health and safety of others, result in a fundamental change in service (e.g., providing medical care, leaving the Fixed Route to go to another location, etc.), would not be necessary to make the service accessible (e.g., a request for a specific seat, or to only ride alone, etc.), or result in an undue financial burden on the transit agency. Some examples of potential reasonable modification requests are:

1. Use of a ramp or lift without a mobility device



2. Allowing a person with diabetes to eat or drink on the bus to avoid a drop in glucose
  3. Door-through-door assistance, rather than curb-to-curb for a person with vision impairment
- **Securement Area or Station:** On a vehicle, a designated location for riders using wheelchairs, equipped with a securement system.
  - **Securement Device, Equipment or System:** On a vehicle, equipment used for securing a wheelchair against uncontrolled movement during transport.
  - **Service Animal:** Any guide dog, signal dog, or other animal individually trained to work or perform tasks for an individual with a disability, including, but not limited to, guiding individuals with impaired vision, alerting individuals with impaired hearing to intruders or sounds, providing minimal protection or rescue work, pulling a wheelchair, or fetching dropped items.
  - **Service Animal Trainee:** Any dog or miniature horse that is undergoing training to be a service animal.
  - **Service Animal Trainer:** An individual exercising care, custody, and control over a service animal trainee during a course of training designated to develop the service animal trainee into a service animal.
  - **Service Area:** Paratransit/Dial-A-Ride is a requirement in a zone extending  $\frac{3}{4}$  of a mile on either side of a Fixed Route line. This zone may not result in a geographic pocket of disservices surrounded by services on all sides – such a zone is to be absorbed. Collectively, this zone is called the Service Area.
  - **Trip Denial:** A trip denial occurs when three circumstances are met:
    - The trip request is presented in a manner consistent with the Day in Advance Rules; AND
    - All trip slots up to an hour before and up to an hour after the requested trip time are full; AND

- The provider is unable to bring in an extra driver and vehicle to accommodate the trip.
- OR a rider requests a round-trip and we can only provide one leg of the trip. If the rider does not take the offered one-way trip, **both** of the trips are denials.
- Our goal is zero denials of ADA-eligible trip
- **Wheelchair:** A 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.

## ADA Policy introduction

Valley Transit is committed to compliance with Section 504 of the Rehabilitation Act of 1973, as amended; Americans with Disabilities Act (ADA), signed into law on July 256, 1990; and RCW 49.60, Washington's Law Against Discrimination (WLAD).

These civil rights legislations prohibit discrimination based on disability and require transportation service options to be provided to a person with disabilities comparable to those available to people without disabilities.

It is the policy of Valley Transit that, when viewed in its entirety, services, programs, facilities, and communications provided by Valley Transit, directly or by a contracted service provider, are readily accessible to and usable by individuals with disabilities to maximum extent possible.

New construction and facility alterations completed by Valley Transit will be ADA complaint. If full ADA compliance is unfeasible due to structural impracticability, facility alterations will be ADA compliant to the maximum extent feasible. For information on upcoming projects and an opportunity to comment on plans, please visit our website or contact our ADA Coordinator: Vicki Croes at 509-525-9140.

Valley Transit provides ADA related training to staff upon hire and refresher as needed to ensure staff are trained to proficiency, as appropriate to their duties, so they operate vehicles and equipment safely and properly assist and treat people with disabilities in a respectful and courteous way.

It is the policy of Valley Transit that, when viewed in their entirety, services, programs, facilities, and communications provided by Valley Transit, directly or by a contracted service provider, are readily accessible and usable to individuals with disabilities to the maximum extent possible. 49.CFR.37.105 If any document or resource is not readily available in the most accessible format for your use, Valley Transit can supply alternative formats upon request.

## 1. Fares

Valley Transit has a zero-fare policy through December of 2025 as a pilot project for all services except Job Access. Before the end of 2025, the Valley Transit Board of Directors will make a determination on whether the zero-fare pilot will be formally adopted as the long-range fare schedule.

Job Access passes are available for unlimited rides during a calendar month for \$12. Passes are available in Walla Walla from our Main Office at 1401 W. Rose Street and on Token Transit. (49 CFR 37.131 (c)).

## 2. Approved mobility devices

Valley Transit can accommodate mobility devices that meet the following definitions and minimum standards:

- A wheelchair is a mobility aid belonging to any class of three- or more-wheeled devices; that is usable indoors; and is designated or modified for and used by individuals with mobility impairment, whether manually or power operated.
- A mobility device is equipment designed or intended to assist people with mobility disabilities (i.e., walkers, canes, braces, crutches).
  - Valley Transit may not be able to accommodate equipment that is not primarily designed for the use by people with mobility impairments (i.e., shopping carts, skateboards).
  - Mobility devices must be stored out of the path of travel for other passengers.

Valley Transit will transport riders with their mobility devices, unless:

- Doing so is inconsistent with safety requirements in this policy or by the vehicle's manufacturer specifications (e.g., the combined weight of the wheelchair and occupant exceeds that of the vehicles lift specifications).

- The use of the mobility devices poses a direct threat. For more information see 11. Denial of service.

### 3. Mobility Device Securement

Operators will do the following when securing mobility devices:

- Use front and rear tie-downs.
- Secure mobility devices at the strongest parts of the device. However, the passenger can indicate the most optimal tie-down spot.
- Mobility device will be secured as per the manufacturer specifications in regards to forward or rear facing.
- Assist riders with securement systems, ramps, and seatbelts.
- A passenger will not be denied transportation if their mobility device cannot be fully secured (provided it fits within the approved equipment).

Valley Transit does not require, but recommends that riders apply brakes on their mobility devices when on a lift or in securement areas. For power chairs or scooters, Valley Transit recommends riders turn the power switch to the “off” position on the lifts or in securement areas. Operators cannot assist riders using power chairs or scooters with the operation of their equipment.

Valley Transit’s policy on if mobility device securement is mandatory.

Valley Transit will not refuse to transport someone whose mobility device cannot be satisfactorily restrained as long as the mobility device fits within the definitions in 2. Approved mobility devices.

### 4. Portable oxygen equipment

Valley Transit allows riders to travel with respirators and portable oxygen supplies, consistent with applicable U.S. Department of Transportation rules on the transportation of hazardous materials in 49 CFR Subtitle B, Chapter 1, Subchapter C. Riders must secure portable oxygen equipment safely and the equipment must not obstruct the aisle.

## 5. Personal care attendants

A personal care attendant is someone who travels with and assists a rider with their personal needs due to a disability. Valley Transit does not require personal care attendants. However, if used, customers must provide their own personal care attendant.

A personal care attendant differs from a companion or guest. A guest or companion is anyone who accompanies the rider who is not designated as their personal care attendant.

Operators are not required to provide attendant services, such as assisting a rider with use of oxygen, or medical equipment, administering medication, or other personal needs. Riders who require attendant's services should travel with a personal care attendant.

For information on fares for personal care attendants, guests, and companions, see 1. Fares For information on scheduling ADA complementary paratransit rides with personal care attendants, guests, and companions, see 12. ADA complementary paratransit services.

## 6. Service animals and service animal trainees

A service animal is any guide dog, signal dog, miniature horse, or other animal individually trained to work or perform tasks for a person with a disability. A service animal trainee is any dog or miniature horse that is undergoing training to be a service animal.

Valley Transit allows service animals and service animal trainees to accompany people with disabilities in all organization vehicles and facilities. Riders may use more than one service animal.

Valley Transit does not charge a fare for service animals or service animal trainees. If a service animal or service animal trainee causes damage to Valley Transit's vehicles or facilities, the user of the service animal or service animal trainee may be charged for those damages.

To ride Valley Transit's services, service animals or service animal trainees:

- Must be on a leash, tether, or harness unless use of such a device would interfere with the task the service animal or service animal trainee performs, or the person's disability prevents use of such devices. In these cases, the handler must use voice, signal, or other effective means to maintain control of the service animal or service animal trainee.
- Must not be aggressive towards or pose a direct threat to the health or safety of Valley Transit staff, other riders, or other animals.
- Must be potty-trained.

Valley Transit staff will not request written certification that a rider's animal is a service animal or service animal trainee or request a demonstration of service animal or service animal trainee's task(s). However, Valley Transit staff may ask users of service animals the following questions:

- Is the animal required because of a disability?
- What work or task has the animal been trained or is in training to perform?

Valley Transit may deny service to a service animal or service animal trainee if the animal is out of control of the handler, posing a direct threat, not potty-trained, or if its handler refuses to answer the question(s) about the animal noted above.

If Valley Transit denies service to the service animal or service animal trainee, the handler/trainer/person with a disability may still use Valley Transit services. Valley Transit staff will provide the handler/trainer/person with a disability information on how to appeal the service animal/service animal trainee's service denial and, if applicable, options to remedy the situation so the service animal/service animal trainee can be allowed to use Valley Transit vehicles and facilities.

Valley Transit staff will not take charge of the rider's service animal or service animal trainees. Riders are welcome to use a personal care attendant or companion to assist with caring for a service animal or service animal trainees.

Federal and state law do not consider emotional support animals to be "service animals." Refer to Valley Transit's rider's guide for policies about emotional support animals and pets accessing Valley Transit vehicles and facilities.

Service animals and service animal trainees must remain at the rider's feet or on the rider's lap. The animal may not sit on a vehicle seat.

It is a violation of Washington State law to knowingly misrepresent an animal as a service animal or service trainee to secure that animal the rights afforded to service animals (RCW 49.60.214). Such violations may result in civil/monetary penalties.

## 7. Boarding assistance

Valley Transit operator will position the vehicle to make boarding and disembarking as easy as possible for everyone, minimize the slope of the ramp, and use the vehicle's kneeling option as needed. Operators will allow riders with disabilities adequate time to board and disembark the vehicle.

Operators will use vehicle accessibility equipment to assist customers (i.e., vehicle annunciators, lifts/ramps). For information on procedures when vehicle accessibility equipment is not functioning, see 8. Maintenance of lifts or ramps.

When necessary or upon request, operators will provide riders assistance using lifts, ramps, and securement systems. Upon request by the rider, operators may assist riders using manual wheelchairs up vehicle ramps if doing so does not constitute a direct threat to the health or safety of the operator. For more information, see 11. Denial of service.

Riders using wheelchairs may board the vehicle lift separately from their wheelchair. Riders may use the vehicle lift facing towards or away from the vehicle. Valley Transit does not require operators to assume the control of a



power wheelchair or assist a passenger in/out of their wheelchair. Riders are welcome to ride with a personal care attendant to accomplish these tasks. For more information, see 5. Personal care attendants.

Operators shall position the bus to make boarding and alighting as easy as possible for everyone, minimize the slope of the ramp/lift, and use the kneeling option as needed. Passengers with a disability shall be allowed adequate time to board and alight the vehicle.

## 8. Maintenance of lifts or ramps

Valley Transit will use and maintain vehicle and facility accessibility features and repair malfunctioning features promptly.

When an operator discovers a vehicle's lift/ramp is out of order, the operator will report it immediately to a supervisor.

Valley Transit will take the following steps for services with malfunctioning features:

- Valley Transit will remove fixed route vehicles with inoperable lifts/ramps from service as soon as possible and no later than before the vehicle's next service day. If a fixed route vehicle is operating with an inoperable lift/ramp and a rider requires the lift/ramp and if the next vehicle on the route is not scheduled to arrive at the stop for over 30 minutes, Valley Transit will dispatch alternative transportation immediately to transport that rider. (49 CFR 37.163)
- Demand responsive service vehicles with an inoperable lift/ramp may remain in service for the remainder of the day if Valley Transit can assign riders requiring this accessibility equipment to another vehicle.
- All vehicles found to have an inoperable lift/ramp will not be returned to service until the lift/ramp is repaired, with the FTA-permitted exception of the following: if Valley Transit does not have a spare vehicle to replace the vehicle with an inoperable lift/ramp, Valley Transit may return the vehicle to service temporarily, for a maximum of 3-5 days while making preparations to repair the lift/ramp.

Valley Transit will work with riders who require reasonable modifications due to an accessibility feature being out of order. See 14. Reasonable modification for information on making these requests.

Riders who notice accessibility features that are not in working order should notify the vehicle operator immediately or call Valley Transit customer service at 509-525-9140.

## 9. Priority/reserved seating

All Valley Transit fixed route vehicles contain signage designating priority/reserved seating at the front of the vehicle for older adults and people with disabilities and at all wheelchair securement locations. The signage instructs riders to comply with the bus operator's request to make these seats available to older adults and people with disabilities who prefer to use them.

Valley Transit drivers will allow riders using mobility aids to board if securement areas are not otherwise occupied by a mobility device, regardless of the number of riders on the vehicle. Operators will ask other riders sitting in priority and reserved seating areas to move to other available seats or stand. Vehicle operators may ask ambulatory people with a disability to vacate a wheelchair securement site seat. Operators are not required to enforce the priority and reserved seating designation beyond making the request. (4 CFR 38.27 (a); 49 CFR 37.167 (j)).

## 10. Stop announcements

Valley Transit fixed route services will make on-board announcements at stops, major intersections, destination points, transfer points with other fixed routes, and at sufficient intervals along the route. Operators will announce other stops upon request. (49 CFR 37.167)

## 11. Denial of service

Valley Transit may deny, suspend, or exclude any rider from its facilities and/or services for engaging in conduct that is violent, seriously disruptive, illegal,

considered a “direct threat” to others, or for the behaviors/actions as described in this policy, Valley Transit’s rider guide and RCW 9.91.025, unlawful transit conduct.

A direct threat is a significant risk to the health or safety of others that cannot be eliminated by a reasonable modification to Valley Transit policies, practices, procedures, or by the provision of auxiliary aides or services, such as traveling with a personal care attendant. A direct threat does not occur when a person’s disability results in an appearance or involuntary behavior that may offend, annoy, or inconvenience others.

Riders suspended or excluded from Valley Transit property and/or services may request an appeal of this decision by contacting Valley Transit. See 13.

Complaint process for Valley Transit’s contact information. (RCW 9.91.025).

## **12. ADA complementary paratransit services**

Valley Transit offers ADA complementary demand response and deviated fixed route services. These services are available upon request by ADA complementary paratransit eligible individuals and/or the general public. This section provides details on these available services.

### **12.1 Eligibility requirements**

People with a disability or disabling health condition that prevents them from independently using Valley Transit fixed route buses some or all of the time may access Valley Transit paratransit.

Presence of a disability or a disabling health condition by itself does not automatically make a person eligible for paratransit service. The ability to use Valley transit services is the basis for eligibility.

Valley Transit will review applications for paratransit eligibility based on the following qualifications. People are eligible for Valley Transit’s paratransit service if they:

- Are unable to board, ride, or exit a ramp/lift-equipped bus without assistance.

**OR**

- Need to use a ramp/lift but it cannot be deployed safely at the bus stop.

**OR**

- Have a disability that prevents travel to and from their bus stop under certain conditions.

**AND**

- Are certified to use Valley Transit paratransit.

Valley Transit will respond to paratransit eligibility applicants in writing. If the applicant does not receive an eligibility answer within 21 days of submitting a completed application, Valley Transit will treat the applicant as eligible and provide paratransit services until the organization makes a final eligibility determination.

## 12.2 Categories of eligibility

Valley Transit will classify an applicant’s paratransit eligibility as conditional, unconditional, or temporary. The table below shows descriptions of eligibility types and circumstances for eligibility types

| Eligibility Type                                | Circumstances   | Description  |
|---|---|--|
| <b>Unconditional</b>                            | A person with a disability who cannot independently ride fixed route transit.   | Permitted to make all trips using paratransit                    |
| <b>Conditional</b>                              | Including, but not limited to, a person prevented from riding fixed route transit by: <ul style="list-style-type: none"> <li>• Disability or combination of disability and architectural/path-of-travel barriers from getting to/from the boarding area.</li> </ul> Specific inaccessible routes or stops | Eligible to use paratransit for some trips, but not all.         |
| <b>Temporary (unconditional or conditional)</b> | A person is prevented from using all or some, fixed routes or stops during a certain amount of time.  | Temporary eligibility to use paratransit based on circumstances. |

### 12.3 Eligibility application process

ADA Paratransit eligibility is determined through an application process, in which the passenger provides information to Valley Transit to explain their level of need. Valley Transit often seeks information from treatment or health care providers to help with defining the functional abilities of applicants.

To qualify for Paratransit/Dial-A-Ride service, a passenger must meet at least one of the following criteria

- Inability to get on or off a transit bus that is equipped with a wheelchair lift/ramp device
- Inability to get to or from a regular Valley Transit bus stop due to a disability
- Inability to wait at a regular bus stop due to a disability
- Inability to understand and follow directions or informational signs for reasons other than language or literacy

#### **OR**

- 70 years of age or older (passengers approved under “Honored Citizen” status utilizing Demand Response service if this is their only qualifying criterion)

All potential Dial-A-Ride passengers are required by the Americans with Disabilities Act to apply for Dial-A-Ride service. According to the ADA, Valley Transit must:

- Make an eligibility determination within 21 days of receiving the complete application
- Provide written notification explaining the rationale behind a determination that the applicant is not eligible for service
- Provide the applicant with the ability to appeal a denial or conditions of service

- Provide materials in accessible formats upon request
- Dial-A-Ride applications can be received by requesting one in person at Valley Transit's Main office located at: 1401 W. Rose St. Walla Walla, WA 99362
- You can also request one by phone at either the Valley Transit Administration 509-525-9140, or Dispatch 509-527-3779. Lastly, you may request a Dial-A-Ride pass by emailing [info@valleytransit.com](mailto:info@valleytransit.com) and requesting a Dial-A-Ride application.
- Valley Transit requires a Professional Verification form completed by a medical provider for Dial-A-Ride applications as well as a medical release form.
- Applicants may obtain assistance completing the form by calling 509-525-9140 or in person at Valley Transit's Main office.

Valley Transit offers a unique specialized category of eligibility called "Honored Citizens". This category is for individuals who are 70 years of age or older, but who do not qualify under other ADA criteria for transportation eligibility. They will receive service, but it is not subject to the guaranteed ride policy of the ADA.

Should an applicant be found ineligible and disagree with this finding, they have 60 days to file an appeal. Once the request for an appeal is received, a hearing for the appeal will be scheduled within 30 days by the Appeals Committee. An individual who has filed an appeal will be notified in writing of the time, date, and location of the appeal hearing and will have the right to speak in person on their behalf and/or have others represent them at an appeal hearing. Attendance is not mandatory for an individual requesting an appeal. If an individual requesting an appeal (or their representative) cannot attend, they may request a telephone interview to submit additional information. If the individual or a designated representative is not present at the appeal hearing, the Appeals Committee's decision will be based on the information submitted.

Dial-A-Ride service is not required to be provided to an individual pursuing an eligibility appeal. However, if the Appeals Committee has not decided within 30 days after the hearing, temporary service will be provided until a decision on the appeal is issued.

The Appeals Committee will issue a final written decision within 30 days of the appeal hearing. The decisions of the Appeals Committee shall be final.

Requests for an appeal must be sent in writing to Valley Transit at the following address:

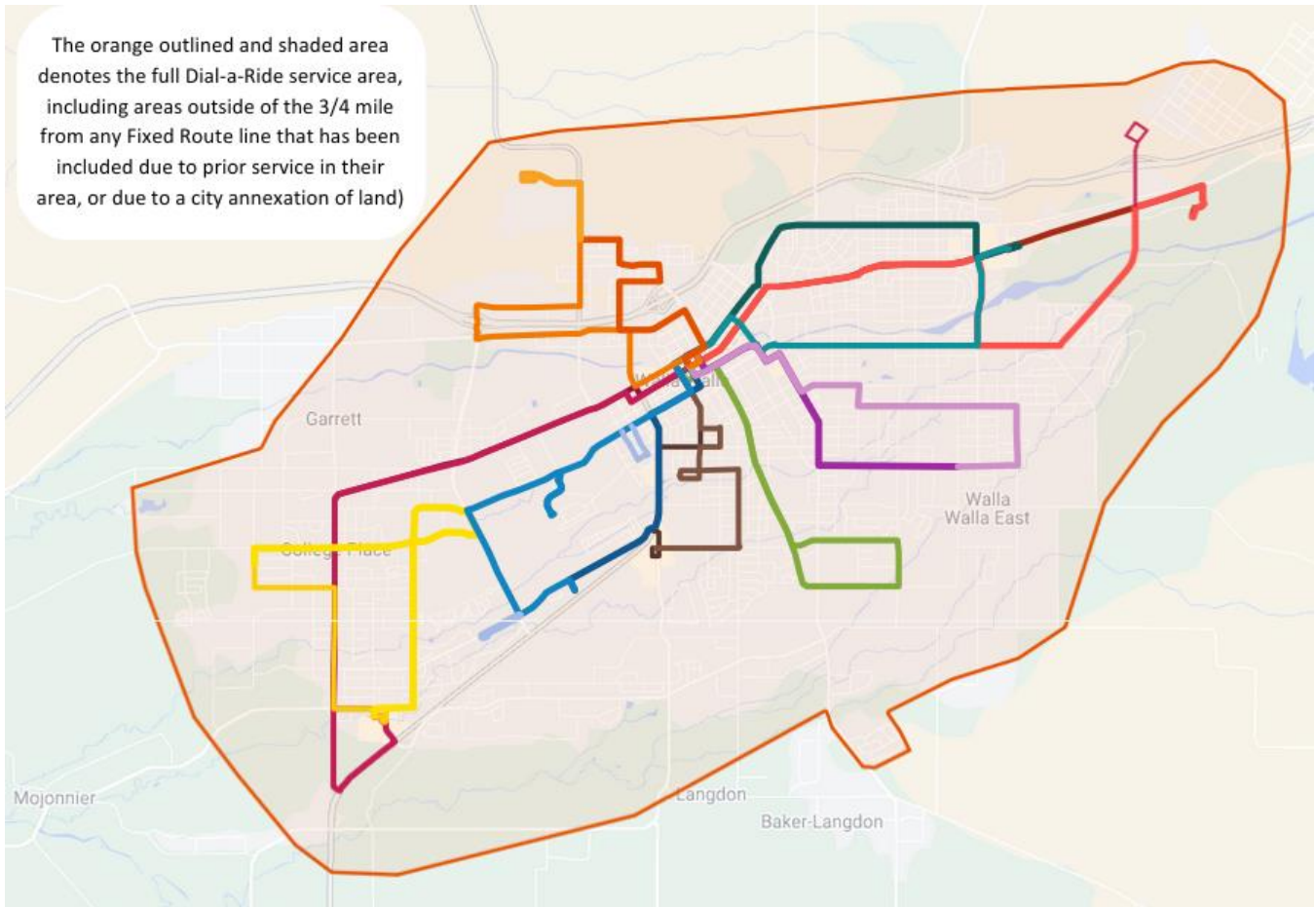
Valley Transit

1401 W. Rose St.

Walla Walla, WA 99362

## 12.4 Service Area

Valley Transit provides paratransit/Dial-A-Ride within  $\frac{3}{4}$  of fixed route service. The map below demonstrates a zone of  $\frac{3}{4}$  a mile on either side of a Fixed Route bus line, where Paratransit/Dial-A-Ride support is required. Additionally, you will see colored segments outside of the grey radius where Valley Transit provides service within city limits, as capacity allows, as a courtesy to those residents living more than  $\frac{3}{4}$  of a mile from the closest Fixed Route bus line. This city-limits clause covers only Walla Walla and College Place, Washington.



## Overview of Populations Served: Walla Walla County Demographic information

|  | Walla Walla County | % of Total | College Place Service Area | CP % of Total | Walla Walla Service Area | WW % of Total | State of Washington | % Of Total |
|--|--------------------|------------|----------------------------|---------------|--------------------------|---------------|---------------------|------------|
| <b>Total Population</b>                  | 61,890             |            | 9,804                      |               | 33,492                   |               | 7,785,786           |            |
| <b>Older Adults (aged 65+)</b>           | 12,626             | 20.4%      | 1,716                      | 17.5%         | 5,962                    | 17.8%         | 1,308,012           | 16.8%      |
| <b>People with Disability (under 65)</b> | 6,561              | 10.6%      | 981                        | 10%           | 3,818                    | 11.4%         | 692,935             | 8.9%       |

Sources: disability information from 2022 Census QuickFacts (State of Washington statistics shared for comparison)

\*Population numbers are an estimate, recent census data provided percentages only



## 12.5 Origin-to destination service

This broad description is utilized intentionally by the ADA (and Valley Transit) to meet the individual needs of each passenger. While some may be able to use a more limited version of service, such as curb-to-curb, others may need door-to-door service. The purpose is to ensure that each eligible passenger can use Paratransit/Dial-A-Ride services within the published area and schedule of service. Rather than the ADA requiring a specific type of service for all, this decision is left to the passengers and the operators. It is Valley Transit's practice to meet the requirements of the rider that do not fundamentally alter the nature of their service with nothing more than a verbal request. A few examples of requests that *would* alter the nature of the service and thus *not* be made are:

- Assistance through a door and into/ out of a passenger's home (or beyond a common lobby of a public building)
- Leaving a vehicle unattended for a lengthy period of time
- Losing the ability to keep an unattended vehicle in line-of-sight
- Actions that are unsafe (backing down a narrow alley, etc.)

Examples of service levels:

| Type                     | Description   |
|--------------------------|---|
| <b>Curb-to-curb</b>      | Passenger boards from the curb in front of their pickup and alights at the curb of the destination                |
| <b>Door-to-door</b>      | Passenger is taken from the door of their pickup location to the door of their destination.                       |
| <b>Door through door</b> | Passenger is taken from the door of their pickup through the door of their destination (common lobby only)        |
| <b>Feeder</b>            | Service takes rider from pickup location and connects rider with an accessible fixed rote to complete their trip. |

If a rider makes a curb-to-curb reservation, but at the time of service an otherwise unknown barrier is discovered and the rider requires additional assistance, the rider may request door-to-door assistance from the driver. Valley Transit cannot take actions that would fundamentally alter the nature of its service or create undue burdens.

Our operators cannot enter a passenger’s home. Other operational examples are evaluated on a case-by-case basis. Valley Transit makes its best effort to accommodate every reasonable modification request and to fulfill all origin-to-destination requests that don’t constitute a fundamental alteration of its service, and the tradeoff is to ask riders to observe a strong preference for such requests to be made at least a day in advance (preferably at the time of the original ride reservation).

Our operators must not leave vehicles unattended for a lengthy period of time or out of line-of-sight. They must not take actions that are unsafe such as backing down a narrow alley, etc.

### 12.6 Days and hours of operation

Valley Transit’s ADA complementary paratransit/Dial-A-Ride is available on the same days and hour as Valley Transit’s fixed route services. Holiday operating days and hours for ADA complementary paratransit are the same as fixed route service.

|          | <b>Routes and Hours</b>           | <b>Monday – Friday</b> | <b>Saturday</b>   | <b>Sunday &amp; Holidays</b> |
|----------|-----------------------------------|------------------------|-------------------|------------------------------|
| <b>1</b> | Isaacs/WWCC                       | 6:15 am – 5:45 am      | X                 | X                            |
| <b>2</b> | College Ave/Meadowbrook           | 6:15 am – 5:45 am      | X                 | X                            |
| <b>3</b> | 2 <sup>nd</sup> Ave / Wa-Hi       | 6:15 am – 5:45 am      | X                 | X                            |
| <b>4</b> | Melrose / Alder                   | 6:15 am – 5:45 am      | X                 | X                            |
| <b>5</b> | Fairgrounds                       | 6:15 am – 5:45 am      | X                 | X                            |
| <b>6</b> | VA/Medical Loop                   | 6:15 am – 5:45 am      | X                 | X                            |
| <b>7</b> | Pleasant Street Loop              | 6:15 am – 5:45 am      | X                 | X                            |
| <b>8</b> | College Place Loop                | 6:15 am – 5:45 am      | X                 | X                            |
| <b>E</b> | East Loop (Valley Transit + plus) | 5:45 pm – 8:40 pm      | 10:45 am – 6:10pm | X                            |
| <b>W</b> | West Loop (Valley Transit + plus) | 5:45 pm – 8:40 pm      | 10:45 am – 6:10pm | X                            |

|            |                                   |   |  |                      |
|------------|-----------------------------------|---|--|----------------------|
| <b>C</b>   | Connector (Valley Transit + plus) | 5:45 pm – 8:40 pm                       | 10:45 am – 6:10pm                      | X                    |
| <b>DAR</b> | Dial-a-Ride/Paratransit           | 6:00 am – 6:00pm                        | x                                      | X                    |
| <b>JA</b>  | Job Access                        | 5:00 am – 6:00 am<br>9:00 pm – 11:30 pm | 5:00 am – 11:00am<br>6:10 pm – 11:30pm | 5:00 am –<br>11:30pm |

#### *Holiday Closure*

Valley Transit Fixed Route and Dial-A-Ride will not run on the following nationally recognized holidays:

- New Year’s Day
- Columbus/Indigenous Peoples Day
- Thanksgiving Day
- Christmas Day

Only deviated fixed route and connector services will operate on these reduced schedule holidays:

- Martin Luther King Jr. Day
- Memorial Day
- Labor Day
- The Day After Thanksgiving Day

Valley Transit Job Access will run on the following holidays including New Year’s Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day for registered Job Access clients with advance reservations. **Job Access will not run on Columbus/Indigenous Peoples Day.** Reservations can be scheduled up to two weeks in advance for holiday trips.

### 12.7 Trip Purpose

Valley Transit does not restrict or prioritize trips. A trip to the doctor’s office is given the same importance as a trip to the salon. An eligible passenger may ride anywhere in the service area during scheduled hours of operation, and there is no limit to the number of trips a rider may request, *as long as they are*

*made a day in advance.* Due to capacity constraints, it may not be possible to accommodate a series of same-day add-on requests, but capacity is the only criterion that is considered when scheduling.

## 12.8 Trip scheduling

Riders may request a paratransit trip by calling dispatch at 509-527-3779.

Valley Transit requires Day in Advance scheduling to secure a ride guaranteed by the ADA. Day in Advance means no later than 5:00 pm the day before the trip. On Sunday, voicemail messages left before 5:00 pm will be considered to have been made a Day in Advance for Monday service, and the ride will be scheduled by the opening supervisor. Same Day requests and Add-Ons are considered on a space-available basis, but they are **not** subject to a guaranteed ride under the ADA. For best results call at least two hours before your requested ride. Our ride schedulers are available between 8:00 am and 5:00 pm, Monday through Friday.

### **Subscriptions**

Valley Transit can schedule up to 14 days in advance. However, recurring trips that happen at least weekly and at a predictable time may be scheduled on a subscription basis. These types of trips might be for work, dialysis, physical therapy, or similar routine appointments. While Valley Transit does not employ any restrictions on where a person may take a subscription trip, these sorts of trips may not make up more than 50% of the overall capacity of trips delivered. A shortage of capacity would be the only reason a rider could find their use of subscription service restricted.

Subscription rides may be requested once eligibility has been determined and a pattern of ongoing, regularly scheduled rides without No Shows and/or Late Cancellations has been established. Please have the following information available when requesting a subscription:

- Passenger Name and mailing address
- Exact addresses of where you will be traveling to and from
- How long you will need the standing ride appointment
- Consistent dates and times you will need the ride appointments on

To avoid No Show penalties, please call our office to place your subscription on hold during times of vacation, illness or any other reason that you will not need your scheduled ride. Subscription rides (including dialysis patients) are automatically canceled on the following holidays: New Year's Day, Columbus/Indigenous Peoples Day, Thanksgiving Day, and Christmas Day.

#### **Promise Window and On-Time Performance**

At the time a ride reservation is made, the passenger is provided with a commitment from Valley Transit to arrive within the 30-minute pickup window. This is referred to as the Promise Window. Valley Transit aims to deliver 99% of trips within 15 minutes of the opening of the pickup window and to keep 90% of all trips within the 30-minute Promise Window.

#### **Courtesy Window or Dwell Time**

Valley Transit will wait five minutes after arriving to pick up a passenger for the rider to present themselves to ride. This does not mean the rider only has five minutes to physically board the vehicle, but that they need to visually confirm their intent to board within this window. If the Courtesy Window closes without the passenger presenting to ride, the trip is booked as a No Show and the driver will continue to their next scheduled ride. A pattern of

excessive No Shows could jeopardize a passenger's eligibility for services, more on this on page 17.

### **On-Time Performance**

On-Time Performance in the ADA Paratransit system is considered under two criteria:

- Was the passenger boarding completed within the Promise Window discussed above?
- Once boarded, was an excessively long trip avoided?

Valley Transit considers a trip to be excessively long if the entirety of the travel time for the passenger exceeds 60 minutes. The system goal is for 95% of trips to be completed within 45 minutes, and for 99% of trips to be completed within 60 minutes.

## **12.9 Companions and personal care attendants on ADA complementary paratransit service**

When arranging for a trip on ADA complementary paratransit services, riders should notify the Valley Transit scheduler if they are traveling with a personal care attendant. Additionally, Valley Transit will accommodate one non-personal care attendant companion in addition to a personal care attendant if the rider notifies the scheduler of the companion when arranging the trip. Valley Transit will accommodate additional non-personal care attendant companions on a space-available basis.

See 1. Fares and 5. Personal Care Attendants for fares and general information for personal care attendants and guests/companions.

## **12.10. Visitor certification**

Visitors are people with disabilities who live outside of the Valley Transit service area and would like to use Valley Transit ADA complementary paratransit. Visitors are eligible for a total of 21 days of paratransit service in a

365-day period beginning the first day the visitor uses the service. For additional days of service, visitors must apply for ADA complementary service with Valley Transit.

Valley Transit will certify a visitor using the following process:

Valley Transit honors findings of Paratransit eligibility from other jurisdictions on the same basis as Presumptive Eligibility. For example, a rider visiting Walla Walla from Tri-Cities would enjoy up to 21 days of the same riding privileges on the local system as they found they were eligible for at home. After 21 days they would need to submit a formal application on the Valley Transit system to continue their eligibility status. This visitor status is measured during a rolling 365-day period. (49 CFR 37.121) Visitors may be required to provide proof of visitor status (e.g., proof of address, etc.).

As another example, if a visitor is coming from an area that does not have Paratransit services, but believes they would be eligible if those services existed, they can request visitor eligibility for 21 days by providing proof of disability. In either example, the rider in question must also supply proof of visitor status. If the rider in these examples is moving to the Valley Transit service area, they would be encouraged to submit a full eligibility application during their 21-day visitor status window to ensure continuity of service.

### **12.11 Trip denials**

Valley Transit will try to meet all request for ADA complementary paratransit service.

If Valley Transit cannot schedule or negotiate a requested trip within one hour of the requested trip, this constitutes a trip denial, even if the rider accepts a trip that is beyond the negotiated window.

Valley Transit will monitor trip denials and missed trips to ensure ADA complementary paratransit service capacity is adequate.

## 12.12 No-show/late-cancellation policy

A cancellation of any trip reservation more than an hour before the scheduled trip is considered to be only a cancellation, rather than a No Show. A cancellation made within an hour of the scheduled trip is considered a late cancel. Valley Transit considers a late cancel to be equivalent to a No Show due to the significant disruption to service it presents. A No Show occurs when a rider fails to appear to board the vehicle for a scheduled trip, has a late cancel, canceling at the door when the operator is attempting pickup, or simply refuses to board a vehicle that has arrived within the Promise Window. This presumes the vehicle arrives at the scheduled pickup location within the 30-minute Promise Window and waits at least five minutes.

Valley Transit does not count trips as No Shows if they are caused by our error, such as:

- Trips placed on the schedule in error
- Pickups scheduled at the wrong pickup location
- Operators arriving and departing before the Promise Window begins
- Operators arriving late (after the end of the Promise Window)
- Operators arriving within the Promise Window, but departing without waiting the required five minutes

Additionally, Valley Transit does not count trips as No Shows if a situation beyond the passenger's control prevented them from notifying us that the trip cannot be taken, such as:

- Medical Emergency
- Family Emergency
- Sudden illness or change in condition



- An appointment that runs unexpectedly late without sufficient notice

Passengers should contact our office as soon as possible when experiencing No Show circumstances beyond their control.

If a passenger No Shows for the first leg of a trip, all later scheduled rides for the day will **not** be automatically canceled. A round-trip return ride, for example, may result in additional No Shows if not canceled at least one hour prior to the start of the Promise Window. It is the passenger's responsibility to cancel rides they no longer need by calling the Dial-A-Ride dispatch office at least one hour prior to their ride.

### 13. Complaint process

Valley Transit is committed to providing safe, reliable, and accessible transportation services and welcomes customer feedback. ADA complaints and questions about Valley Transit's ADA complaint process may be submitted to Valley Transit's ADA Coordinator, Vicki Croes, using the following methods:

- Email: [vicki@valleytransit.com](mailto:vicki@valleytransit.com)
- **Call:** 509-525-9140
- Send mail to: 1401 West Rose St. Walla Walla, WA 99362

Valley Transit will respond promptly to all complaints that have valid contact information.

Valley Transit will retain copies of complaints, investigation and resolution documentation, and Valley Transit's response to the complaint in accordance with the complaint record retention requirements of the ADA, Washington State Archives Office, and Washington State Department of Transportation Consolidated Grant Program.

To share information about its ADA complaint process, Valley Transit will use the same means it uses to inform the general public about its policies and procedures. This includes through the organization website.

## 14. Reasonable modification

### **Purpose**

The purpose of the reasonable modification policy is to ensure that Valley Transit (VT) offers equal and effective opportunities and access to public transportation services for persons with disabilities and full compliance with the provisions of the Title II of the Americans with Disabilities Act of 1990 and Section 504 of the Rehabilitation Act of 1973.

### **Policy**

Valley Transit is committed to providing equal access and opportunity to qualified individuals with disabilities in all programs, services, and activities. Valley Transit recognizes that in order to have equally effective opportunities and benefits, individuals with disabilities may need reasonable modifications to policies and procedures. Valley Transit will adhere to all applicable federal and state laws, regulations, and guidelines with respect to providing reasonable modifications, as necessary, to afford equal access to programs for persons with disabilities. Valley Transit does not discriminate on the basis of disability in admission to, participation in, or receipt of services and benefits under any transit program or activity. Valley Transit will take appropriate steps to ensure that persons with disabilities have an equal opportunity to participate.

No qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of Valley Transit or be subject to discrimination by Valley Transit.

Requests for modifications of Valley Transit policies, practices, or procedures to accommodate a person with a disability may be made either in advance or at

the time of service. Valley Transit is best able to address and accommodate requests when made in advance.

Advance request for reasonable modifications may be made to Valley Transit by emailing [info@valleytransit.com](mailto:info@valleytransit.com) or by calling 509-525-9140. The request should contain an explanation of the modification needed.

For request at the time of service, Valley Transit operators will determine if the modification can be provided. Operators may consult with Valley Transit management before deciding to grant or deny the request.

Valley Transit will only deny requests based on one or more of the following:

- Granting the request would fundamentally alter the nature of Valley Transit services, programs, or activities.
- Granting the request would create a direct threat to the health or safety of others.
- Without the request modification, the person with a disability can fully use Valley Transit's services, programs, or activities for their intended purpose.

When Valley Transit denies a request for a reasonable modification, the organization will take other actions to ensure that the person with a disability receives the services provided by Valley Transit, to the maximum extent possible.

Valley Transit commits to sharing information with the public about its ADA reasonable modification request procedures using the same means used to inform the public about other organization policies and procedures, including on the organization's website.

# Appendix A: Customer Comment Policy

## Accessibility

People desiring to make comments to Valley Transit shall be able to do so in the following ways: in person, by telephone, fax, or email. All Valley Transit staff having public contact shall be provided with training on the comment process. Comments will be received by the Customer Service Center at the Valley Transit main office, weekdays, from 8:00 am to 5:00 pm

## Acknowledgment

Anyone who submits a comment and provides a name, telephone number, address, or email address shall receive an acknowledgment of the comment within seven (7) business days of receipt of the comment by Valley Transit.

## Investigation and Follow-up

Complaints or concerns shall be assigned to Valley Transit Road Supervisor for investigation and follow-up. Comments and/or suggestions about Valley Transit services will be assigned to staff responsible for service development or another appropriate department for investigation and follow-up.

## Compliments

Compliments regarding individuals shall be forwarded to the employee and their supervisor for acknowledgment. Compliments for the agency shall be forwarded to the General Manager or their designee.

## Tracking

Valley Transit shall maintain a tracking system for all comments which provides a unique identification of each comment and allows ready access to information on the status of the comment at any time. The comment process, i.e., data entry, assignment, tracking, follow-up, response, and reporting, shall be managed by the Operations Department staff.

## Responses

Valley Transit shall respond to the person making a comment, so long as contact information has been provided, within fifteen (15) business days of receipt of the comment. Should the period of time needed for response exceed fifteen days, the person making the comment shall be advised of the status, in addition to receiving a final response. Responses shall be in the requested format (e.g., written, verbal, email, and/or alternative or accessible format).

## Reporting

Each customer comment will be provided to the Valley Transit Board of Directors in their monthly meeting materials. A summary report will be provided to the Board of Directors quarterly.

## Non-Retaliation

Valley Transit shall ensure that the quality of service delivered to those submitting comments to the agency will not, in any way, be negatively impacted by submission.

## Education and Outreach

Valley Transit shall provide information about access to the comment process to riders, employees, agencies that serve people with special needs, and the general public in printed and electronic format such as:

- Valley Transit's website [www.valleytransit.com](http://www.valleytransit.com)
- Schedules and Customer Information Guides
- Revenue Service Vehicle postings

## Appeals Process

Valley Transit shall provide a formal appeals process to all people who are unsatisfied with the outcome of their service complaint. Appeal responses shall be in the format requested (e.g., written, verbal, email, and/or alternative or accessible format)

## Valley Transit Customer Comment Appeals Process

| Action By                         | Action   |
|-----------------------------------|--|
| Customer                          | Within 10 business days of receiving our response to the comment, the customer may submit in writing to the Operations Manager, a detailed explanation of why the response received is unsatisfactory. |
| Valley Transit Operations Manager | Investigate and respond to the submitted appeal within seven business days.  |
| Customer                          | If not resolved satisfactorily, submit in writing to the General Manager, the reason(s) why the received appeal response is unsatisfactory within seven business days.                                 |
| Valley Transit General Manager    | Investigate and respond to appeals submitted within seven business days. The General Manager is the final level within the appeals process.  |

## Record Retention

VT will maintain all records related to comments, complaints, and denials or appeals for a minimum of six years. Summaries of complaints are maintained permanently.

# Appendix B:

## Prohibited Conduct

In addition to all previous provisions, passengers may be subject to refusal of service for the following behaviors:

- Destruction of public property (the vehicle, facilities, and/or their furnishings)
- Doing violence to others or to oneself
- Behavior that is seriously unruly, seriously disruptive, threatening, or frightening to others and not caused by a disability
- Taunting, bullying, or use of vulgar/offensive language with other passengers or Valley Transit staff that is not caused by a disability such as Tourette's
- Behavior that interferes with the safe operation of the vehicle
- Violation of service animal policy by failing to control one's service animal
- Violations of operating rules governing the provision of transportation system-wide
- Engaging in illegal activity
- Smoking, Vaping, or Spitting on the vehicle
- Throwing objects
- Carrying hazardous objects, weapons (except as allowed by Washington Law), or any other materials that may harm others
- Playing musical instruments or devices (personal music devices are okay with the use of headphones)
- Other conduct judged by Valley Transit staff to represent an actual or potential threat to the health, safety, or wellbeing of oneself, the operator, other passengers, and/or other transit personnel

**References** - RCW 9.91.025, Valley Transit Rules of Conduct

Passengers who are excluded from the Valley Transit system. due to a direct threat have the ability to request an administrative appeal by contacting the main office at (509) 525-9140.