

ADA POLICY

ADA Policy

The Americans with Disabilities Act (ADA) was signed into law on July 26, 1990. The ADA is civil rights legislation which requires that persons with disabilities receive transportation services in the most integrated setting appropriate to the needs of the individual and is equal to the service provided other individuals on the fixed route service.

It is the policy of TranGO, to implement this policy, so when viewed in their entirety, the services, programs, activities facilities, and communications provided by TranGO, directly or by a contracted service provider, are readily accessible and usable to individuals with disabilities to the maximum extent possible.

1. **Fare.** TranGO shall not impose special charges or fares, unless authorized under 49 CFR 37, on individuals with disabilities, including individuals who use wheelchairs, for providing services required under 49 CFR 37 or otherwise necessary to accommodate them.

Fares for TranGO are as follows:

- \$1.00 per boarding
- Single Zone Unlimited Monthly Pass - \$30
(South Methow, North Okanogan, Omak/Okanogan Shuttle, Mid Okanogan, Twisp-Okanogan Connector, North Methow and South Okanogan)
- Two Zone Unlimited Monthly Pass - \$60
(Choose two connected zones and add a third connected zone for free)
- System-Wide Unlimited Monthly Pass - \$90

2. Holiday Closures

TranGO offices are closed on the following Holidays:

New Year's Day, Martin Luther King Day, Presidents' Day, Memorial Day, Independence Day, Labor Day, Veterans' Day, Thanksgiving Day and Day after, Christmas Eve Day and Christmas Day. (If the holiday falls on a Saturday, it will be taken on the previous Friday. If the holiday falls on a Sunday, it will be taken on the following Monday.)

TranGO transportation services operate on the above referenced Holidays, except for Thanksgiving Day, Christmas Day and New Year's Day.

3. Approved Equipment

- "Wheelchair" or "mobility devise" as used in this Policy means a mobility aid belonging to any class of three- or more- wheeled devices, usable indoors or outdoors, designed or modified for and used by individuals with mobility impairments, whether operated manually or powered.
- A wheelchair or mobility devise and occupant must not exceed the combined weight and lift specifications of any lift. TranGO will carry any wheelchair or mobility devise and occupant that are within such weight and lift specifications, unless it is demonstrated to be inconsistent with legitimate safety requirements.

- Due to safety requirements, walkers used on any TranGO vehicles must be collapsible and stored between seats.
- Wheelchairs and mobility devices must be in good working order, with batteries charged, tires inflated, footrests attached, and all parts secure.

4. Wheelchair and Mobility Device Brakes

When occupying a lift or designated securement location, it is recommended that passengers apply the brakes on their wheelchairs and mobility devices; however, they are not required to do so. With power wheelchairs or mobility devices, it is recommended that the power switch be turned to the “off” position. Again, this is not mandatory.

5. Portable Oxygen Use

Individuals with disabilities who use respirators or portable oxygen devices are allowed to travel with respirators and properly secured portable oxygen supplies, consistent with applicable Department of Transportation rules on the transportation of hazardous materials. Oxygen supplies must not obstruct the aisle.

6. Designated Securement Locations

Wheelchairs and mobility devices must ride in designated securement locations in a vehicle, and TranGO shall provide and use a securement system to ensure that the wheelchair and mobility devices remain within the designated securement locations. Provided, that TranGO shall not deny transportation to a wheelchair or mobility device and its occupant on the ground that the wheelchair or mobility device cannot be secured or restrained satisfactorily by the vehicle’s securement system. In designated securement locations, Operators will use front and rear tie-downs to secure wheelchairs and mobility devices. Operators will secure wheelchairs and mobility devices at the strongest parts of the device; however, the occupant can indicate the most optimal tie-down spot. The wheelchair or mobility device will be secured front facing unless otherwise requested by the occupant. Drivers will assist passengers with securement systems, ramps, and seatbelts, and if it is necessary for the Drivers to leave their seats to provide assistance, they shall do so; however, Drivers cannot assist occupants using power wheelchairs or mobility devices with the actual operation of their equipment. TranGO requires all passengers be secured with mobility device tie-downs and lap belts.

TranGO may recommend to an occupant of a wheelchair or mobility device that the individual transfer to a vehicle seat. Provided, TranGO may not require the individual to transfer.

7. Stop Announcements

All TranGO drivers provide fixed route stop announcements as follow:

- A. TranGO drivers shall announce at least at transfer points with other fixed routes, other major intersections and destination points, and intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location.
- B. TranGO drivers shall announce any stop on request of an individual with a disability.

8. Personal Care Attendants

A Personal Care Attendant (PCA) may ride with you at no charge. A PCA is someone who travels with, and helps, a rider who is not able to travel alone. You must provide your own PCA if you need one. Please let us know when scheduling your ride whether or not you will be using a PCA. This information will guarantee a place for him or her to ride with you.

Guests and companions may ride with you, provided that space is available for them. Guests and companions must pay regular fare. A companion is anyone who rides with you who is not designated as your PCA.

9. Service Animals

A service animal is any guide dog, signal dog, or other animal individually trained to work or perform tasks for an individual with a disability. In order to ride TranGO:

- The animal must be on a leash, remain under control of the owner and behave appropriately.
- The animal must not be aggressive towards people or other animals.

10. Boarding Assistance

Drivers shall position the bus to make boarding and de-boarding as easy as possible for everyone, minimize the slope of the ramp, and use the kneeling option as needed. Bus drivers shall provide assistance to passengers as needed. Passengers with disabilities shall be allowed adequate time to board and disembark the vehicle.

11. Maintenance of Lifts

Bus drivers must test the lift during each pre-trip inspection. Break down of accessibility equipment must be reported immediately to dispatch. A vehicle with an inoperable lift must be removed from service as soon as possible and cannot be returned to service until repaired.

12. Priority Seating

Upon request, bus drivers shall ask – but not require – passengers to yield priority seating at the front of the bus to seniors and persons with disabilities. Drivers are not required to enforce the priority seating designation beyond making such a request. Drivers shall not require an individual with a disability to use yielded priority seats or designated priority seats, if the individual does not choose to use the seats.

13. Reserved Seating

Wheelchair and mobility device securement areas on buses are reserved. Passengers using common mobility aids shall be boarded if the securement areas are not otherwise occupied by a wheelchair or mobility device, regardless of the number of passengers on the bus. Bus operators are required to ask passengers sitting in the securement areas to move to other available seats or to stand.

14. Suspension of Service

A rider's privileges may be suspended for any of the following infractions on any TranGO property, including vehicles, bus stops, or stations:

- Smoking or carrying a lit pipe, cigar, or cigarette (unless in a designated smoking area).
- Discarding or dumping litter in places other than the recognized receptacles.
- Consuming alcoholic beverages or in a procession of alcoholic beverages.
- Loud, raucous, unruly, harmful, or harassing behavior.
- Engaging in other conduct that is inconsistent with the intended purpose of the transit facility or vehicle.
- Privileges will not be suspended of a rider with disabilities solely because the rider's disability results in appearance or involuntary behavior that may offend, annoy or inconvenience employees of TranGO or other persons.

15. Types of Service

Complementary paratransit service for ADA paratransit eligible persons shall be origin to destination service, and may also be provided by on-call service to an accessible fixed route, where such service enables the individual to use the fixed route system for his or her trip.

16. Notification of Policy

TranGO will notify the public of the ADA policy on the website and in the riders guide.

17. Paratransit Service

TranGo will provide paratransit service "Paratransit Service" to ADA paratransit eligible persons as set forth below. If a person meets the eligibility requirement below with respect to some trips but not others, the person shall be eligible only for those trips that he or she meets the eligibility requirement.

a. Eligibility Requirement:

A person may access TranGO Paratransit if that person has a disability or disabling physical or mental (including vision impairment) health condition "disability" that prevents him or her from independently using the TranGO Fixed Route some or all of the time.

The presence of a disability by itself does not automatically make a person eligible for Paratransit Service. The level of a person's ability to successfully ride TranGO Fixed Route is the basis for eligibility. A person is eligible for Paratransit Service if she or he:

- Is unable to board, ride, or exit a lift or ramp-equipped bus without the assistance of another individual, OR
- Needs to use a lift, ramp or other boarding assistance device, but it cannot be deployed safely at the person's bus stop, OR
- Has a disability that prevents travel to and from his or her bus stop under certain conditions, AND
- Is certified to use TranGO Paratransit.

Prospective riders may call 509-557-6177 to request an application and/or to schedule an in-person assessment to become certified to use the Paratransit Service. TranGO will respond to all applicants in writing within 21 days of receipt of completed application and in person assessment. If the applicant does not receive an answer within 21 days, the applicant shall be treated as certified and provided Paratransit Services until an answer is received.

b. *Categories of Eligibility:*

A TranGO paratransit applicant’s eligibility may be classified as conditional, unconditional, or temporary. These categories are defined and mandated by the ADA regulation.

Category Type	Description	Type of Eligibility
1	A person with a disability who cannot independently ride public transit without the assistance of another individual	Unconditional
2	Prevented by disability or combination of disability, architectural and/or weather barriers from getting to the boarding area	Conditional
3	Prevented from using fixed route during a certain period of time	Temporary

c. *Service Area:*

Paratransit Service is provided within ¼ of a mile of TranGO fixed route service.

d. *Origin to Destination Service:*

Paratransit usually provides curb-to-curb service. Riders needing extra assistance from the bus operator between the door and the vehicle should request this service when reserving trips. Operators are not authorized to enter a rider’s residence to assist them.

e. *Trip Scheduling:*

Paratransit Service trips can be scheduled between 8:00 am and 4:30 pm Monday – Friday. Trips can be scheduled up to 7 days in advance. We attempt to accommodate trip reservations or changes requested for the same day, but cannot guarantee them.

f. *Trip Cancellation:*

Unwanted paratransit trips must be cancelled at least 2 hours before the earliest scheduled pick-up in order to avoid a No-Show penalty.

18. No-Shows

Definitions:

These definitions apply to all TranGO demand response rides and Paratransit Service. They apply to rides provided directly by TranGO employees and to rides provided by any contracted provider (OCTN, as an example) engaged by TranGO to provide service. They apply whether the rider arranges the rides, or by someone on her/his behalf, and whether the rides are single trips, subscription trips, or grouped trips.

A No-Show occurs when the dispatch center does not receive advance cancellation notice of a trip, as defined below. TranGO staff will make a serious effort to determine the reason for each No-Show.

a) Trips Recorded As No-Shows

A No-Show occurs when a demand response vehicle arrives on time for a requested trip, and;

- i. The rider is not at the requested pick-up address; or
- ii. The rider is at the pick-up address, but decides not to go once the vehicle arrives; or
- iii. The rider is at the pick-up address, but does not board within five minutes of vehicle's arrival; or
- iv. The ride is cancelled less than two hours before the scheduled earliest pick up window.

b) Trips Not Recorded As No-Shows

An occurrence is not recorded as a No-Show when a rider misses a trip because:

- i. The TranGO demand response vehicle did not arrive on time (within 30 minutes before a scheduled pick-up or 15 minutes after the scheduled pick-up); or
- ii. The operator or dispatch office makes an error with the trip; or
- iii. An event outside the rider's control occurs, like a sudden change in the rider's health, or an emergency in the rider's family.

c) Trips Scheduled Later In The Day After A No-Show

A rider can schedule multiple rides for one day. If a No-Show occurs for one of them and others are scheduled later in the day, the other rides will remain scheduled unless the rider (or another appropriate person on his/her behalf) cancels them. Communication about cancellations is important. If multiple rides are scheduled and a rider's plans change, the No-Shows can add up quickly if dispatch doesn't know a rider's intentions.

d) No-Show Violation Tracking

TranGO Tracks No-Shows and No-Show violations on an individual basis.

e) No-Show Violation Consequences

When riders incur No-Show violations, TranGO suspends demand response service for them as described below.

TranGO imposes suspensions when riders incur violations over the course of the year.

- i. The first No-Show leads to the initial letter reminding rider of the NoShow Policy.
- ii. The second No-Show leads to a suspension warning.
- iii. A third No-Show will lead to suspension of 2 weeks.
- iv. Subsequent No-Shows will receive increased suspensions, and revocation of the ability to request subscription service for at least ninety days. The ninety-day revocation of subscription service begins after the suspension has ended.
- v. If subscription service is suspended for a rider, it may only be restored if the rider does not incur a No-Show violation during the ninety-day waiting period, unless the rider is paratransit eligible.

f) Procedures For Application Of No-Show Policy

Operators and Dispatchers document all No-Shows in the dispatch system as they occur.

- i. Contact after No-Shows: TranGO or its service provider tries to contact the riders (or others supporting them) the same day or the day after a No-Show, to confirm what happened, investigate whether the agency made any mistakes with service, and suggest options for avoiding future No-Shows. This contact gives caregivers of persons with cognitive impairments an opportunity to work on avoiding more No-Shows. Staff keeps a record of these contacts.
- ii. TranGO staff will mail a letter to each rider who receives a verified No-Show.
- iii. Trips scheduled later in the day after a No-Show: A rider can schedule multiple rides for one day. If a No-Show occurs for one of them and others are scheduled later in the day, the other rides will remain scheduled unless the rider (or another appropriate person on his/her behalf) cancels them. Communication about cancellations is important. If multiple rides are scheduled and a rider's plans change, the No-Shows can add up quickly if dispatch doesn't know a rider's intentions.

g) Procedures For Appeal Review

- i. If the rider wants to appeal a suspension, she/he must contact TranGO's General Manager by letter or telephone within five (5) working days of receiving the notification letter. The rider will continue to receive service during the appeal process. TranGO does not guarantee consideration of untimely appeals.
- ii. The rider may choose to have the appeal conducted in person, in writing, or by telephone. Others are welcome to participate in support of the rider. Most riders use an informal approach to register their appeals via a telephone call to the TranGO General Manager. The purpose of an appeal is limited to reviewing relevant facts and how the policy is applied, but this approach allows questions to be resolved quickly, and can lead to mutually agreed modifications to a suspension that support the rider's needs and independence while meeting TranGO's goal to improve No-Show rates.

19. Visitor Certification

Paratransit eligible visitors are eligible for 21 days of service in a 365-day period beginning on the first day the service is used by the visitor. (Provided the individual has current eligibility at a different transit agency that can be confirmed.) For additional days of service, the individual is expected to register under TranGO's eligibility procedures.

Designated Responsible Person For Complaint Procedure:

Questions, complaints, concerns, suggestions or requests related to issues covered by the ADA must be brought to the attention of the CEO/General Manager of TranGO, who is the designated responsible person.

Contact may be made in writing to: TranGO, PO Box 507, Okanogan, WA 98840; or by fax (509) 315-2548; or by telephone weekdays (509) 557-6177 between the hours of 8:30 am and 5:00 pm or by email to kscalf@okanogantransit.com.

Complaint Procedure:

The ADA prohibits TranGO from discriminating against an individual with a disability in connection with the provision of transportation service. If you believe that TranGO has violated the provisions of the ADA or that you have been subjected to discrimination, you may file a complaint.

How to file a Complaint?

You may file a signed, written complaint one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number or email address)
- How, when, where and why you believe that TranGO violated the ADA or you were discriminated against. Include the location, names and contact information of any witnesses
- Other information that you deem significant

The complaint may be filed in writing with TranGO at the following address:

TranGO

Attn: Kelly Scalf

By Mail:

PO Box 507
Okanogan, WA 98840

Delivery in Person:

303 Second Ave, Suite A
Okanogan, WA 98840

By Phone:

(509)557-6177

By Email:

kscalf@okanogantransit.com

Note: TranGO encourages all complaints to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to Kelly Scalf as soon as possible, but no later than 180 days from the alleged date of discrimination.



What happens when I submit my complaint to TranGO?

All complaints will be directly addressed by TranGO. TranGO shall also provide appropriate assistance to persons filing complaints, including those persons with disabilities, or who are limited their ability to communicate in English. Additionally, TranGO shall make every effort to address complaints in an expeditious and thorough manner.

In instances where additional information is needed for investigation of the complaint, TranGO will contact the complainant in writing. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information will result in administrative closure of the complaint.

Once sufficient information for investigation the complaint is received by TranGO, a written response will be drafted subject to review by the transit's attorney. If appropriate, TranGO's attorney may administratively close the complaint. In this case, TranGO will notify the complainant of the action as soon as possible, and will give the reasons for such administrative closure.

How will I be notified of the outcome of my complaint?

TranGO will send a final written response to the complainant and advise the complainant of his or her right to 1) appeal within 7 calendar days of receipt of the final written decision to the Board of Directors of TranGO, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration. Every effort will be made to respond to complaints within 60 working days of receipt of such complaints, if not sooner.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

Office of Civil Rights	Director
Federal Transit Administration	FTA Office of Civil Rights
915 Second Avenue, Ste 3142	East Building, 5th Floor
Seattle, WA 98174	1200 New Jersey Ave, SE
Phone: 206-220-7954	Washington, DC 20590
Fax: 206-220-7959	



PAGE IS BLANK INTENTIONALLY