



Americans with Disabilities Act (ADA) Policy

Effective as of February 16, 2023

Title VI Notice to Public

It is the Grant Transit Authority's (GTA) policy to assure that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964, be excluded from participation in, be denied the benefits of, or be otherwise discriminated against under any of its programs and activities. Any person who believes his/her Title VI protection has been violated, may file a complaint with Grant Transit Authority. For additional information regarding Title VI complaint procedures and/or information regarding our non-discrimination obligations, please contact Grant Transit Authority Title VI Coordinator at gta@granttransit.com or by calling 800-406-9177.

Americans with Disabilities Act (ADA) Information

This material can be made available in an alternate format by emailing Grant Transit Authority at gta@granttransit.com or by calling 800-406-9177. Persons who are deaf or hard of hearing may make a request by calling the Washington State Relay at 711.

Notificación de Título VI al Público

La política de Grant Transit Authority es garantizar que ninguna persona, por motivos de raza, color u origen nacional, según lo dispuesto en el Título VI de la Ley de Derechos Civiles de 1964, sea excluida de la participación, se le nieguen los beneficios o se le discrimine de otro modo en cualquiera de sus programas y actividades. Cualquier persona que considere que se ha violado su protección del Título VI puede presentar una queja ante Grant Transit Authority. Para obtener más información sobre los procedimientos de queja del Título VI o información sobre nuestras obligaciones contra la discriminación, comuníquese con el coordinador del Título VI de Grant Transit Authority a gta@granttransit.com or by calling 800-406-9177.

Información de la Ley sobre Estadounidenses con Discapacidades (ADA, por sus siglas en inglés)

Este material puede estar disponible en un formato alternativo al enviar un correo electrónico a Grant Transit Authority a gta@granttransit.com o llamando a la línea sin cargo 800-406-9177. Personas sordas o con discapacidad auditiva pueden solicitar la misma información llamando al Washington State Relay al 711.

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 comparable to those available on the fixed route service.

It is the policy of the Grant Transit Authority (GTA) that, when viewed in their entirety, services, programs, facilities, and communications provided by GTA, 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

1. Fares

General Public Transportation Bus Services provided by GTA including Fixed Route Services, DART Services, and ACCESS Para-Transit Services are Fare-Free for all ages.

2. Holiday Closures

Grant Transit Authority is closed on the following nationally recognized holidays: New Year's Day, Martin Luther King, Jr. Day, Presidents' Day, Memorial Day, Juneteenth, Independence Day, Labor Day, Veterans Day, Thanksgiving, Day After Thanksgiving, Christmas Day.

3. Approved Equipment

Passengers will be transported provided the lift and vehicle can physically accommodate them, unless doing so is inconsistent with legitimate safety requirements (e.g., the combined weight of the wheelchair/occupant exceeds that of the lift specifications). Additionally, GTA can accommodate mobility devices that meet the following minimum standards:

- *Wheelchair* means a mobility aid belonging to any class of three or more wheels, usable indoors, designed or modified for and used by individuals with mobility impairments, whether manually operator or powered.
- The measurement of the equipment must be no more than 30" wide and 48" long, including footrests and backpacks.
- Walkers must be collapsible and able to be stored between seats.
- Equipment must be in good working order, with batteries charged, tires inflated, and all parts secure. (49 CFR 37.3)
- GTA may approve non-standard mobility devices on a case-by-case basis when used by a person with a disability for mobility purposes.

4. Mobility Device Brakes

When occupying a lift or securement area, GTA recommends passengers apply their mobility device brakes; however, they are not required to do so. With power chairs or scooters, GTA also recommends the power switch be turned to the “off” position.

5. Portable Oxygen Use

Individuals with disabilities who use portable oxygen devices are allowed to travel with respirators and properly secured portable oxygen supplies. Oxygen supplies must not obstruct the aisle. (49 CFR 37.167 (h))

6. Securements

Operators will use front and rear securements to secure mobility devices. Operators will secure mobility devices where they are strongest. Passengers may indicate their preferred securement places on their wheelchairs. However, GTA Operators have responsibility for securing mobility aids as optimally and safely as possible. All occupied mobility devices will be secured front facing, unless on a Fixed Route bus with rear facing securement area. Operators will assist passengers in negotiating ramps and fastening seatbelts; however, cannot assist riders using power chairs or scooters with the operation of their equipment. GTA will not refuse to transport someone whose mobility device cannot be satisfactorily secured provided the mobility device fits within the definition described in Section 3. (49 CFR 37.165)

7. Stop Announcements

Stops at major intersections, transfer points, and destination points will be announced on GTA Fixed Routes buses. Transit Operators will announce other stops upon request. (49 CFR 37.167 (a-c))

8. Personal Care Attendants

A Personal Care Attendant (PCA) is someone who travels with, and helps an eligible rider meet their personal needs. The rider may travel with the PCA, or travel occasionally with a PCA. Riders must provide their own PCA, if needed.

A guest or companion is anyone who accompanies a rider who is not designated as a PCA. (49 CFR 37 (d)) Reservations must be made in advance for guests and companions when riding GTA Paratransit. Riders are guaranteed the right to bring one companion with them, provided a reservation has been made. Other companions will be permitted subject to space available. All PCAs and companions must embark/disembark from the same location as the rider.

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 on GTA vehicles:

- The service animal must remain under control of the owner, and behave appropriately.
- The service animal must remain at the rider's feet or on the rider's lap. It may not occupy a separate seat.
- Examples of inadequate control or inappropriate behavior include aggressiveness toward other riders or their service animals, inadequate grooming or cleanliness, howling and barking, etc. (49 CFR 37.137 (d))

10. Pet Policy

Small pets, other than service animals, may also be brought on board provided they are in an approved pet carrier and remain under the control of the owner.

11. Boarding Assistance

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

12. Maintenance of Lifts or Ramps

Bus operators must test lifts and ramps during pre-trip inspections. Breakdown of accessibility equipment must be reported immediately to dispatch. A vehicle with an in operable lift or ramp must be removed from service as soon as possible and cannot be returned to service until repaired. If there is a lift or ramp failure, a replacement vehicle must be dispatched if the next trip to the destination of any passenger using a mobility device is scheduled in more than 30 minutes. If the next trip to the destination of any passenger using a mobility device is scheduled in 30 minutes or less, a replacement vehicle may be dispatched, if available. (49 CFR 37.163)

13. Priority Seating

Upon request, bus operators shall ask – but not require – passengers to yield priority seating at the front of the bus to seniors and persons with disabilities. Operators are not required to enforce the priority seating designation beyond making such a request.

14. Reserved Seating

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 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.

15. Suspension of Service

A rider's privileges may be suspended on any GTA property, vehicle, bus stop, or station for infraction of any of the following rules:

- NO smoking, including e-cigarettes or vaping
- NO unruly or disrespectful behavior
- NO profanity or derogatory statements, including racial slurs
- NO intimidating, harassing, or violent behavior
- NO eating
- NO alcoholic beverages (Non-alcoholic beverages OK if covered securely)
- NO flammable or corrosive items or liquids
- Use of all electronic devices (including cell phones) should be limited so as not to disturb other riders
- Appropriate attire, including shirt and shoes, is required. GTA will speak with riders who exhibit inappropriate attire or behavior. GTA may deny service to riders who continue to exhibit inappropriate attire or behavior.
- Personal hygiene must meet standards a reasonable person would find acceptable for a shared public space. GTA will speak with riders who aren't meeting standards for personal hygiene. GTA may deny service to riders who continue to exhibit unacceptable personal hygiene.
- Engaging in other conduct that is inconsistent with the intended purpose of the transit facility, station, or vehicle. (RCW 9.91.025)
- GTA may also suspend service for violations of its paratransit service No Show Policy.

16. Notification Policy

GTA will notify the public of the ADA policy on its website www.granttransit.com, and will be available upon request by calling 1-800-406-9177.

17. Paratransit Service

- a. *Eligibility Requirement:* A person may access GTA Paratransit if that person has a disability or disabling health condition that prevents him or her from independently using the GTA Fixed Route some or all of the time. 49 CFR 37.123

The presence of a disability or a disabling health condition by itself does not automatically make a person eligible for paratransit service. The level of a person's ability to successfully ride GTA 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 assistance,
OR
- Needs to use a lift or ramp 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 GTA Paratransit

Prospective riders may call 800-406-9177 or 509-509-766-1688 to request an application and/or to schedule an in-person assessment.

GTA 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 eligible and provided services until an answer is received.

- b. *Categories of Eligibility:* A GTA Paratransit applicant's eligibility may be classified as conditional, unconditional, or temporary. These categories are defined and mandated by the Americans with Disabilities Act (ADA) regulation.

Category Type		Description	Type of eligibility
Category 1		A person with a disability who cannot independently ride public transit	Unconditional
Category 2		Prevented by disability or combination of disability, architectural and/or weather barriers from getting to the boarding area	Conditional
Category 3		Prevented from using fixed route during a certain period of time	Temporary

- c. *Service Area:* GTA Paratransit is provided within $\frac{3}{4}$ of a mile of GTA Fixed Route service, except for commuter or express routes. 49 CFR 37.131 (a)
- 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 trips can be scheduled between 8:00 am and 4:30 pm Monday – Friday. Trips can be scheduled up to 7 days in advance. Trip reservations or changes to previously scheduled trips, are not accepted the day of the trip.
- 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.
- g. *Trip Purpose:* Grant Transit Authority provides paratransit service for trips of any purpose and does not prioritize or deny specific types of trips.

NO-SHOW DEFINITIONS

These definitions apply to all GTA demand response rides, including ACCESS and DART service. They apply to rides provided directly by GTA employees and to rides provided by any contracted provider (People For People, as an example) engaged by

GTA 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. GTA staff will make a serious effort to determine the reason for each No-Show.

1) Trips recorded as No-Shows

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

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

2) Trips not recorded as No-Shows

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

- a) The GTA demand response vehicle did not arrive on time as described in the Rider's Guide; or
- b) The operator or dispatch office makes an error with the trip, or
- c) 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.

3) 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.

NO-SHOW VIOLATION TRACKING

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

NO-SHOW VIOLATION CONSEQUENCES

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

- 2) GTA imposes suspensions when riders incur violations over the course of the year.
 - a. The first No-Show leads to the initial letter reminding rider of the No-Show Policy.
 - b. The second No-Show leads to a suspension warning.
 - c. A third No-Show will lead to suspension of 2 weeks.
 - d. 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.
- 3) 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.

PROCEDURES FOR APPLICATION OF NO-SHOW POLICY

- 1) Operators and Dispatchers document all No-Shows in the dispatch system as they occur.
- 2) Contact after No-Shows: GTA or it's 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.
- 3) GTA staff will mail a letter to each rider who receives a verified No-Show.
- 4) 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 intention.

PROCEDURES FOR APPEAL REVIEW

- 1) If the rider wants to appeal a suspension, she/he must contact GTA's Administrative and ACCESS Coordinator 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. GTA does not guarantee consideration of untimely appeals.
- 2) 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 GTA Administrative and ACCESS Coordinator. 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 GTA's goal to improve No-Show rates.

18. Visitor Certification

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 GTA's eligibility procedures. (49 CFR 37.121)

19. Complaint Process

GTA is committed to providing safe, reliable, efficient, and friendly service. GTA takes customer complaints seriously. GTA also recognizes that customers may feel vulnerable about making complaints. For this reason, GTA's Customer Comment Policy has strong provisions to protect customers from retribution for making a complaint. GTA customers may register complaints through a variety of channels according to preference, including by telephone, mail, in person, or through electronic means. (RCW 46.07b)

For further information regarding the complaint process, a complete copy of the GTA Customer Complaint Policy has been attached to this document.

20. Reasonable Modification

Requests for modifications of GTA policies, practices, or procedures, to accommodate an individual with a disability, may be made either in advance or at the time of the transportation service. GTA is best able to address and accommodate a request when customers make their requests before the trip.

21. Direct Threat

If a person is violent, seriously disruptive, or engaging in illegal conduct GTA may, consistent with established procedures for all riders, refuse to carry the passenger. A person who poses a significant risk to others may be excluded from service if reasonable modifications to the public accommodation's policies, practices, or procedures will not eliminate that risk. (49 CFR 37.5 App. D/29 CFR 36.208)

Behaviors that may cause immediate exclusion from the system include:

- Destruction of public property (the vehicle, and/or its furnishings)
- Doing violence to others or to oneself
- Behavior that is seriously unruly, seriously disruptive to service, threatening, or frightening to others
- Behavior that interferes with the safe operation of the vehicle
- Violations 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 conduct
- Other conduct judged by GTA to represent an actual or potential threat to the health, safety or wellbeing of oneself, the operator, other passengers, and/or transit personnel

Passengers who are excluded from the system due to a direct threat have the ability to request and administrative appeal by contacting GTA at (509) 765-0898, ext. 124.

Grant Transit Authority

Customer Complaint Policy

Grant Transit Authority is committed to providing reliable, safe, and satisfying transportation options for the community. Customers of the Grant Transit Authority are a fundamental aspect of our business and as such, their feedback is crucial to the growth and development of the agency.

The Grant Transit Authority customer Complaint Policy has been established to ensure that riders of the system have an easy and accessible way to provide feedback to the agency. Grant Transit Authority is open to hearing any customer feedback including complaints, comments, suggestions, or concerns.

Contacting Grant Transit Authority: Riders can contact Grant Transit Authority in the following ways:

1. **US Mail:** Riders can mail their feedback to the Grant Transit Authority Administrative Office at PO Box 870, Moses Lake, WA 98837.
2. **Feedback Line:** Riders can contact the Grant Transit Authority toll free at 800-406-9177. This line is available 24 hours a day, seven days a week.
3. **E-Mail:** Riders can contact the Grant Transit Authority by e-mail at gta@granttransit.com.
4. **Fax:** Riders can send written feedback by fax to 509-350-8203.
5. **Language Line:** For riders who speak a language other than English or Spanish, Grant Transit Authority will utilize the services of the Language Line to facilitate the call.
6. **Web Site:** Riders can offer feedback on the Grant Transit Authority Web Site at www.granttransit.com.

Feedback Review Process: All feedback from customers is valued and will be reviewed by the Administrative Services Manager and/or the Operations Manager. After review, the customer communication will be forwarded to the appropriate agency representative(s) for follow-up.

1. Customer concerns, complaints, or employee commendations will be forwarded to the appropriate department manager.

2. Recommendations for service or system modification will be sent to the Operations Manager.
3. Questions regarding discrimination or bias will be sent to the agency Department Manager and General Manager.

Feedback Acknowledgement: Anyone who submits a comment, complaint, or service suggestion to the Grant Transit Authority shall receive a response provided they give legible contact information.

- Feedback sent via mail or fax will receive a response within seven business days.
- E-mail, phone, or web originated messages will be returned within 72 hours.

Customer Appeals Process: Any person who is dissatisfied with the response they receive from the Grant Transit Authority is welcome to appeal the decision. A review team consisting of the General Manager, a rider representative and one other staff member will review customer appeals.

Information about Policy: Information about the Customer Complaint Policy, including how to submit a complaint, will be made available to riders:

1. When customers are approved for ADA paratransit service (ACCESS).
2. When customers are re-evaluated for ADA paratransit service (ACCESS) or if customers are not re-evaluated, every two years.
3. On comment cards available on all transportation vehicles.
4. At the Grant Transit Authority Administrative Office.
5. On the website, www.granttransit.com

Reporting: The General Manager shall compile a summary of rider responses for the Board, staff, and employees for use in reviewing and evaluating service.

Tracking: The Grant Transit Authority shall maintain a tracking system for all feedback from customers that provides a unique identification of each customer communication and allows ready access to information on the status of the comment at any time.

Protection from Retribution: Customers of the Grant Transit Authority should be able to submit feedback without fear of retribution from the agency. If a rider feels like they are being treated unfairly in response to the feedback that they provided, they should contact the Grant Transit Authority Administrative Services Manager. Grant Transit Authority will appropriately discipline any employee that retaliates against a customer.