

## **ADA Policy**

## Contents

General and Contact Information .....	2
Definitions and References .....	3
ADA General Policy .....	4
Holiday Closures .....	4
Description of Fixed Route Services .....	5
Description of Paratransit Services .....	7
Scheduling .....	10
Service Interruptions .....	17
Prohibited Conduct.....	19
Appendix A: Service Area and General Information .....	20
Appendix B: Customer Comment Policy.....	21
Appendix C: Reasonable Modification Policy .....	23

## General and Contact 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.

### *Name of Transit Agency*

Valley Transit

1401 West Rose Street

Walla Walla, Washington 99362

### *Contact Person (questions, comments, concerns, ADA complaints)*

Agency ADA Concerns: Melanie Hall, HR Manager

Public Transit ADA Concerns: Lowell Nee, Operations Manager

Phone: 509-525-9140

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## Definitions and References

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.

**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.

**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:

- Use of a ramp or lift without a mobility device
- Allowing a person with diabetes to eat or drink on the bus to avoid a drop in glucose
- Door-through-door assistance, rather than curb-to-curb for a person with vision impairment

**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:

- a. The trip request is presented in a manner consistent with the Day in Advance Rules; AND
- b. All trip slots up to an hour before and up to an hour after the requested trip time are full; AND
- c. The provider is unable to bring in an extra driver and vehicle to accommodate the trip.
- d. 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.
  - o Our goal is zero denials of ADA-eligible trips

**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

## ADA General Policy

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.

## Holiday Closures

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

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Columbus/Indigenous Peoples Day
- Thanksgiving Day
- Christmas Day

Valley Transit Job Access will run on all 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. Reservations can be scheduled up to two weeks in advance for holiday trips.

## Description of Fixed Route Services

### 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

### Route Structure

Valley Transit operates nine Fixed Routes and a Paratransit/Dial-a-Ride system that are subject to this plan. Additional Valley Transit bus service, Connector Service, and Job Access services adhere to these principles but are not held to the full ADA statutes.

Fixed-route service is provided throughout the Walla Walla and College Place urban area. Eight routes pulse out from and meet back at a centrally located transfer center in downtown Walla Walla at Main and Fourth Streets with a ninth route circulating College Place. Eighty percent of the homes within the Walla Walla and College Place city limits are within ¼ of a mile of a Valley Transit bus route. All buses are climate-controlled for passenger comfort and have low floors with ramps at the front door to make boarding easy for people who use mobility aids. All buses are equipped with visual and audio announcements of location.

Routes and Hours		Monday – Friday	Saturday	Sunday & Holidays
1E	Mainline Eastbound	6:15 am – 5:45 pm	X	X
1W	Mainline Westbound	6:15 am – 5:45 pm	X	X
2	College Place Circulator	6:15 am – 5:45 pm	X	X
3	2 <sup>nd</sup> Avenue/ Wa-Hi	6:15 am – 5:45 pm	X	X
4	Melrose/ Alder	6:15 am – 5:45 pm	X	X
5	Fairgrounds	6:15 am – 5:45 pm	X	X
6	VA/ Medical Loop	6:15 am – 5:45 pm	X	X
7	Pleasant Street Loop	6:15 am – 5:45 pm	X	X
9	Pine Street Loop	6:15 am – 5:45 pm	X	X
E	East Loop (Valley Transit+plus)	5:45 pm – 8:40 pm	10:45 am – 6:10 pm	X
W	West Loop (Valley Transit+plus)	5:45 pm – 8:40 pm	10:45 am – 6:10 pm	X
C	Connector (Valley Transit+plus)	5:45 pm – 8:40 pm	10:45 am – 6:10 pm	X
DAR	Dial-a-Ride/Paratransit	6:00 am – 6:00 pm	X	X
JA	Job Access	5:00 am – 6:00 am	5:00 am – 11:00 am	5:00 am – 11:30 pm
		9:00 pm - 11:30 pm	6:10 pm - 11:30 pm	X

### *Fare Schedule*

Valley Transit is on a zero-fare pilot through December of 2025. 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.

### *Vehicle Load*

Valley Transit will design its services to keep the number of passengers on its vehicles at a comfortable level, always within the limits of safety. In peak periods, this means that some passengers may be expected to stand for part of the trip. In off-peak periods, services will be designed to try to provide a seat to all passengers. Where services operate on a highway, services will be planned for all riders to be seated. Route segments that have a significant and measurable history of inappropriate passenger behavior may be limited to seated-only capacity so that onboard video security can effectively record passenger activity or conduct. Valley Transit will also plan services to reduce vehicle load during peak service windows exceeding 30 minutes. The following are the maximum loading standards for Valley Transit based on the percentage of seats provided.

<u>Operating Period</u>	<u>Load</u>
Peak 30 minutes	125%
Peak Hour	100%
Base (non-peak)	No Standees
Evening and Saturday Service	No Standees

### *Vehicle Headway*

During peak periods, the frequency of service is usually determined by the load factor standards previously covered. However, during non-peak periods, Valley Transit has established headways (times between buses expressed in minutes), to guide the provision of service equitably through the Service Area. Policy headways for regularly scheduled service should not exceed 60 minutes. Different route and service structures and passenger needs have led to variable headways as listed below.

<u>Service/Route</u>	<u>Headway</u>
Routes 1E, 1W, 2, 3, 4, 5, and 6	30 minutes
Routes 7 and 9	60 minutes
Evening and Saturday Service	45 minutes

Regularly scheduled service does not include morning and afternoon trippers or special-purpose service designed to meet individual circumstances (e.g., shift changes, etc.)

### *On-Time Performance*

Valley Transit defines On Time as zero minutes early to five minutes late. Under no circumstances should buses run ahead of schedule. Late operation will be defined as any service arriving in excess of five minutes beyond the scheduled time. Valley Transit has established an On-Time performance standard of no less than 85% of all scheduled stops.

### *Service Availability*

It is Valley Transit's goal to ensure that 80% of Walla Walla and College Place residents live within  $\frac{3}{4}$  of a mile of a public transit service line. Transit Access is determined by mapping all active public transit bus services in the county and then calculating the population (based on 2020 Census data estimates) within a  $\frac{3}{4}$  of a mile radius of those lines. The information is compared to the total population in Walla Walla and College Place. Valley Transit's Service Area has a population of roughly 43,296. The Fixed Route services are available to 100% of the residents living within the Service Area. Additionally, upon approved application, Paratransit/Dial-a-Ride services are available for 100% of residents meeting the requirements. Valley Transit makes additional service connections to our Service Area through the Market Station/Transit Center with Columbia County, Grape Line, Kayak, and Milton Freewater Public Transit.

### *Vehicle Assignment*

Valley Transit bases vehicle assignment on capacity compared to historic ridership levels and run cut. This allows the avoidance of unnecessary service increases through appropriate vehicle sizing. All Valley Transit vehicles are lift or ramp equipped to provide accessibility.

Vehicles are assigned to the Fixed Routes on the basis of if their size will allow them to travel more easily within the urban environment. These buses are equipped with both front and rear doors for ease of ingress and egress.

Passenger standards are calculated based on the average over one hour in the peak period, at the busiest point of the route. For instance, if a service operates at 30-minute intervals, then 2 buses would pass the busiest point in an hour. The average number of passengers for those buses must fall within the service standard, even though any one bus may be more crowded than average. If the standard is consistently exceeded for the average calculation, Valley Transit may consider larger vehicles for the route(s) in question, or more frequent service to improve the situation.

### *Stop Announcements*

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

## **Description of Paratransit Services**

### *Dial-a-Ride*

Dial-a-Ride service is for people who, because of their disability, are prevented from using Valley Transit's Fixed Route buses, and for all people 70 years of age or older. Dial-a-Ride is not intended to be used as an alternative to the Fixed Route system because it is easier or more convenient than riding the bus. It remains public transportation and should not be confused with private or medical transportation. Passengers may not specify the type of vehicle used for transportation. Valley Transit uses accessible mini-buses, but in the instance, a mini-bus is not available, transportation may take place in a full-sized bus or a supervisor van.

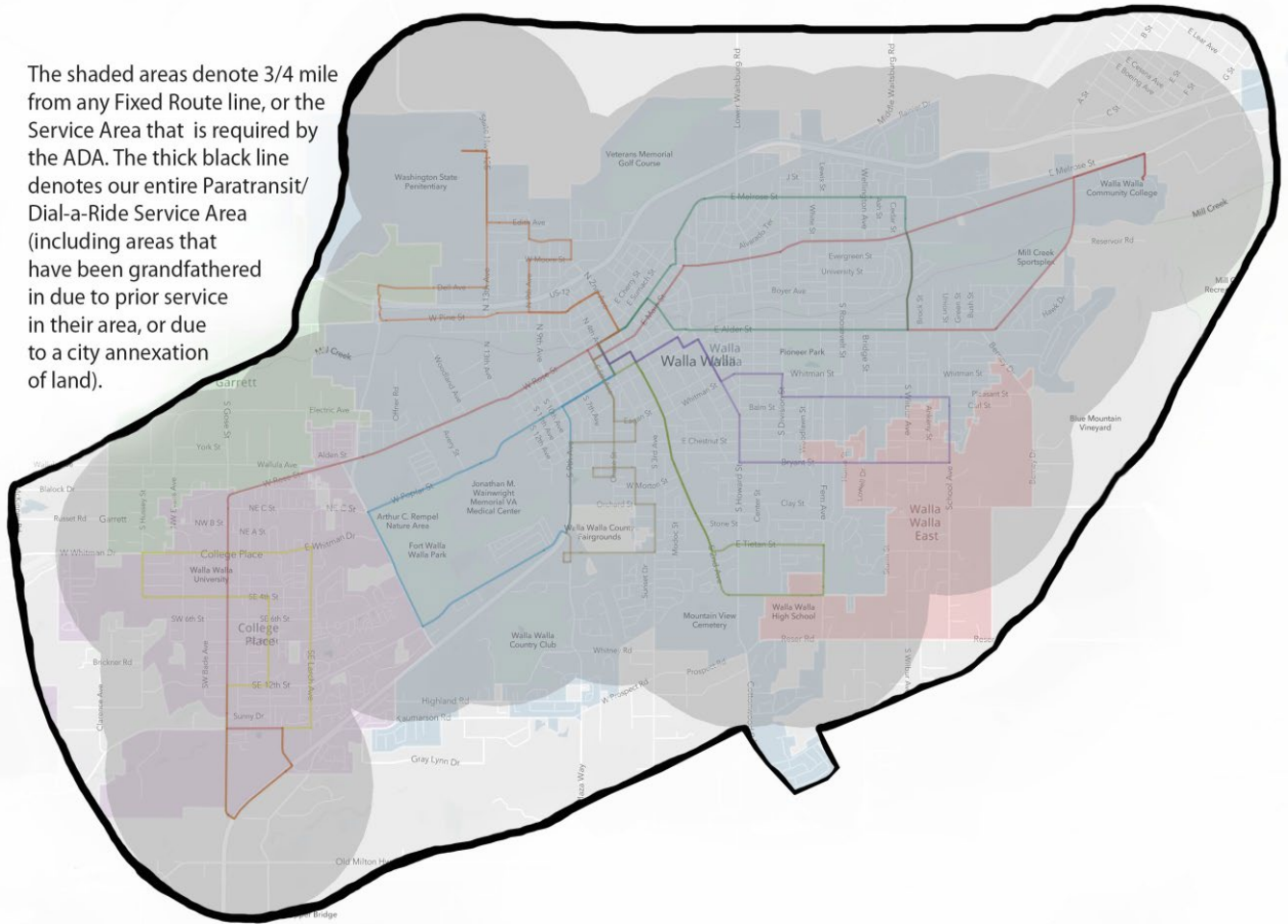
### *Service Area*

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.

The shaded areas denote 3/4 mile from any Fixed Route line, or the Service Area that is required by the ADA. The thick black line denotes our entire Paratransit/Dial-a-Ride Service Area (including areas that have been grandfathered in due to prior service in their area, or due to a city annexation of land).



### ***Fare Schedule***

Valley Transit is on a zero-fare pilot through December of 2025. 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.

### ***Eligibility***

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 utilize 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 the ability to appeal a denial or conditions of service
- Provide materials in accessible formats upon request

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.

#### *Presumptive Eligibility*

Presumptive Eligibility can (and usually does) happen before a prospective rider submits an application to Valley Transit. Upon initial contact, staff can typically make an accurate educated guess about the presence of a condition that prevents the use of Fixed Route. Presumptive Eligibility provides full ADA Paratransit service to an applicant for up to 21 days while their application is being processed. Typically, Presumptive Eligibility is quickly replaced by a more formal finding, and because of this is sometimes mistaken for Temporary Eligibility. If the determination process were to exceed the 21-day period for any reason, the rider’s Presumptive Eligibility would be extended as well.

#### *Temporary Eligibility*

Temporary Eligibility is granted to an applicant with a condition that prevents them from using Fixed Route that is expected to improve in the near future. For example, a passenger with mobility issues due to a recent surgery is likely to be Paratransit eligible for a short period of time following his or her operation. A year later, they may be able to use Fixed Route once more and thus no longer qualify to use Dial-a-Ride. Renewal beyond the initially stated window of eligibility must be reviewed for every instance it is requested.

#### *Conditional Eligibility*

Conditional Eligibility occurs when a passenger presents with an inability to use Fixed Route for some trips (or certain types of trips). For example, a rider may have had a knee replacement, and has issues riding Fixed Route when winter conditions impact their mobility. Because they can use the Fixed Route system just fine during the summer months, they would have conditional eligibility awarded for October through April only. Conditional eligibility is reevaluated every three years with the bias that a passenger will continue to be eligible.

### *Unconditional Eligibility*

Sometimes referred to as Full Eligibility, Unconditional Eligibility means the rider is prevented from using Fixed Route by a condition that is unlikely to improve. Unconditional Eligibility is reevaluated every three years with the bias that a passenger will continue to be eligible.

### *Ineligible*

For this finding, a condition that prevents the use of Fixed Route was not present. Our “Honored Citizen” status for those over 70 years of age does not extend protected Paratransit Eligibility. An applicant who is found Ineligible may file an appeal within 60 days of the finding. If staff is unable to make a determination, the applicant will be sent to an Occupational or Physical Therapist for a Functional Assessment. All costs of a Functional Assessment and the transportation to and from the appointment are covered by Valley Transit.

### *Eligibility Appeals*

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**

## **Scheduling**

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, Memorial Day, Independence Day, Labor Day, Columbus/Indigenous Peoples Day, Thanksgiving Day, and Christmas Day.

### *Trip Purpose, Priority, and Volume*

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.

### *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.

### *Approved Equipment*

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

- Wheelchairs/Scooters being mobility devices that have three or more wheels are usable indoors, designed or modified for use by an individual with a mobility impairment, whether manually operated or alternatively powered.
- Walkers may be used for movement, but not as a seat during travel. Passengers may find collapsible walkers that can be stowed between seats or in the trunk of a vehicle the most convenient to travel with but are not limited to only that model type.
- Whatever mobility device or aid the passengers choose must be in good working order; with batteries charged, tires inflated, footrests attached, and all parts secure. (49 CFR 37.3)

### *Mobility Device Brakes*

When occupying the lift, ramp, or securement area, it is recommended that passengers apply the brakes on their mobility devices; however, they are not required to do so. With powered mobility devices, it is recommended that the power switch be turned to the “off” position, but it is not mandatory.

### *Portable Oxygen Use*

Individuals with disabilities who use portable oxygen devices are allowed to travel with respirators and properly secured portable oxygen supplies. Valley Transit allows for a reasonable personal supply, including extras, but cannot transport bulk supplies safely. Oxygen supplies must not obstruct the aisle. (49 CFR 37.167(h))

### *Personal Care Attendants*

A Personal Care Attendant (PCA) is someone who travels with the passenger to provide any assistance that is needed. PCAs ride for free and must board and alight at the same location as the primary passenger. Valley Transit operators cannot serve in this role, so the passenger will need to provide their own PCA. It is helpful if the applicant indicates on their application form whether or not they will be using a PCA. At a minimum, this information must be shared at the time the trip is scheduled to guarantee a place for the PCA in the vehicle. Both guests and companions may also ride with the passenger, however, they must pay a regular fare.

### *Guest Riders and Children*

A guest or companion is anyone who rides with the passenger that is not designated as their PCA. (49 CFR 37(d)).

Children may ride on Dial-a-Ride if they have an eligible ADA disability or are traveling as a companion with an eligible adult passenger. Children seeking to use Dial-a-Ride as a client must follow the same eligibility process as adults. When riding as a companion to an adult, children 5 years of age or under shall ride for free. Children 5 years of age and under are required to be accompanied by a parent, guardian, or other responsible party (e.g.

older sibling). The responsible party must provide an appropriate car seat in accordance with Washington State's Child Restraint Law.

### *Strollers & Carts*

People and animals utilizing strollers or carts are welcome on all Valley Transit vehicles. However, unless the stroller or cart is being used as a mobility device for a person with a disability, the stroller or cart must be folded up (if possible) and kept out of the aisle. Strollers and carts are not permitted to block aisles, exits, or to occupy the mobility device securement area. The only permissible use of the securement area by a stroller or cart is in the event that apparatus also serves as a mobility device for a person with a disability.

When removing a person from a stroller or cart, the other person should either be held by an adult or moved to a bus seat of their own. When removing an animal from a stroller or cart the designation of the animal determines the next steps:

- If the animal is a **service animal**, once out of the stroller or cart the animal should be harnessed, leashed, or tethered unless the devices would interfere with the service animal's ability to do a task, or a person's disability would prevent the use of such a device.
  - In the event the animal cannot be harnessed, leashed, or tethered, it must remain under the control of its owner at all times.
- If the animal is a **pet**, or emotional support animal, once out of the stroller or cart, the animal must be transferred to a closed container, cage, or carrier. If the passenger does not have a container, cage, or carrier to transfer the pet too, the pet will not be permitted to ride the bus.

### *Service Animals and Pets*

Service animals and pets or animals that provide emotional support, therapy, comfort, or companionship are always welcome aboard Valley Transit vehicles and at our Transit Center and bus stops/shelters, so long as they adhere to all relevant policies. The following policies apply to ALL animals on Valley Transit vehicles or property:

- The animal must be under the owner's control and behave appropriately at all times
- The animal or carrier must not block the aisle or emergency exits. They may remain at the person's feet or on their lap, but may not occupy a vehicle seat.
- The animal must not be disruptive— no *excessive* noise or threatening behavior
- The animal must not pose a direct threat to public health

### *Service Animals*

A service animal is any guide dog, signal dog, or another animal individually trained to work or perform tasks for an individual with a disability. Service animals are not pets. They are working animals that are specifically trained to provide assistance. In addition to the above requirements, to travel on a Valley Transit vehicle a service animal must adhere to the following:

- Be harnessed, leashed, or tethered, unless the device would interfere with the service animals' ability to do a task, or a person's disability would prevent the use of the device.

### *Pets/Other Animals*

Pets and animals that provide emotional support, therapy, comfort, or companionship are not considered service animals. In addition to the restrictions listed above, pets or other animals must adhere to the following:

- Be in a closed container, cage, or carrier at all times
- To protect public health, deceased animals may not be boarded regardless of the use of a carrier.

Under control and well-behaved are the defining characteristics of a trained service animal. The care and supervision of any animal brought onto Valley Transit property is solely the responsibility of its owner. In addition, customers traveling with animals are subject to the same general rules that apply to all passengers, (i.e., any damage or soiling caused by the animal is the responsibility of the passenger). If an animal is not under control, or if its behavior is excessively disruptive or menacing, Valley Transit can refuse service or ask for the animal to be removed from the vehicle. All animals must be kept under physical restraint by the owner at all times. Animals that are disruptive, threatening, or intimidating will be handled on a case-by-case discipline process.

Because of the small size of the mini-buses, pets other than service animals may not be allowed on Dial-a-Ride unless they are small and can be transported in a suitable carrier. The passenger, pet, and carrier must be able to refrain from blocking the aisle. The combined weight of the pet and carrier should not exceed 25 pounds. When booking a ride, please tell the customer service representative that you are bringing a pet so they can ensure there is enough room on the vehicle.

### *Boarding Assistance*

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. Bus operators shall provide assistance to passengers upon request. Passengers with a disability shall be allowed adequate time to board and alight the vehicle.

### *Priority Seating*

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

Mobility device securement areas on buses are considered priority seating, and it is our preferred practice to keep them available whenever possible. 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. If the bus is full, it is not required to make passengers alight in order to make room to board a passenger using a mobility device.

### *Visitor Certification*

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 to 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.

***Notification of Policy***

Valley Transit will notify the public of the ADA Policy on the website and in the riders’ guide. The full copy of the ADA policy is also available upon request at the Valley Transit’s administration office, located at 1401 West Rose Street, Walla Walla, WA.

***Origin-to-Destination***

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
Hand-to-hand	A caregiver delivers the passenger to the operator for transportation, and the operator takes the passenger to a caregiver or receptionist in the common lobby of the destination
Door Through Door	Passenger is taken from the door of their pickup through the door of their destination (common lobby only)
Door-to-door	Passenger is taken from the door of their pickup location to the door of their destination
Curb-to-curb	Passenger boards from the curb in front of their pickup and alights at the curb of the destination

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). More on this subject will be covered under the Reasonable Modification section in Appendix C.

***Carry-on Items***

Generally, carry-on items are limited to what the passenger can independently carry onto the bus and store at their feet for the trip. Occasionally, an adjacent seat that is vacant for all or some of the trip may be utilized for



additional capacity or convenience. However, the owner must remove carry-on items if the seat is needed to allow another passenger to ride.

Valley Transit operators may assist with carry-on items within the following limitations:

- Assistance is limited to getting the items on and off the bus only
- Items will not be loaded or transported that cannot (in the operator's estimation) be safely stowed for the entire trip
- Items will not be allowed to be secured to the exterior of the vehicle (except for bicycles on buses with racks that have been designed and mounted specifically for that purpose)
- Our operators will not assist with an item that (in their estimation) exceeds 25 pounds in weight
- Our operators can only assist with as many packages or groceries as they can safely carry in one trip

### *Securement Policy*

Operators will use front and rear tie-downs to secure mobility devices. Operators will secure mobility devices at the strongest parts of the device; however, the passenger may indicate the most optimal tie-down spot. The mobility device will be secured facing the front of the vehicle. A passenger will not be denied transportation if their mobility device cannot be fully secured (provided it fits within the approved equipment clause above), but the operator will seek verbal agreement from the passenger that they understand they are not safely secured in the event of a collision but wish to travel anyway.

Operators will assist passengers with securement systems, ramps, and seatbelts; however, they cannot assist riders using powered mobility devices with the operation of their equipment. Fixed Route buses are not equipped with seatbelts on the bench seats because of the safety afforded by their much larger size and weight, but passengers seated in wheelchairs and scooters are encouraged to use the seatbelts that are provided as part of the wheelchair securement system. (49 CFR 37.165)

### *Complaint Process*

Valley Transit is committed to providing safe, reliable, and accessible transportation options for the community. Valley Transit has established a Customer Service Complaint Policy and customers wishing to file a complaint and/or obtain a copy of the Customer Complaint Policy may contact Valley Transit at 509-525-9140, on the web at [www.valleytransit.com](http://www.valleytransit.com), or in person, at Valley Transit's administration office located at 1401 West Rose Street, Walla Walla, WA. (RCW 46.07b) That policy is also available as Appendix B in this document. Complaints of this nature are retained for a minimum of six years.

### *Maintenance of Lifts or Ramps*

Bus operators must test the lift or ramp during the pre-trip inspection each day. Breakdown of accessibility equipment must be reported immediately to dispatch. A vehicle with an inoperable 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 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)

## Service Interruptions

### *Cancels, Late Cancels, and No Shows*

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.

### *Suspension of Service*

Because No Shows prevent other passengers from obtaining rides, an accumulation of No Shows may result in the suspension of service. Riders will be subject to suspension of service if they have a significant pattern of No Showing. Valley Transit will review a passenger's percentage of No Shows if they have missed at least three trips in a month with an overall percentage of at least 10% of their trips being No Showed.

Each case for a potential suspension is considered on its own merits and within a demonstrable system context. In no case shall a suspension be disproportional to the pattern of disruption for which it is attempting to inspire correction. In addition, no window of suspension for No Shows will ever exceed 30 days. A passenger who is suspended for No Shows has the same right of appeal as a passenger found ineligible to use Paratransit. All suspension notices include a copy of this policy, information on disputing No Shows, and how to appeal No

Shows and/or suspensions. Passengers who appeal a proposed suspension may continue to ride pending a decision on the appeal. If the appeal is denied, the suspension shall be imposed effective the date the appeal is denied, pending final notification to the passenger.

Valley Transit notifies verbally of No Showed trips on the same day as the occurrence to allow for passenger training and/or dispute of a No Show depending on the circumstances. Valley Transit will notify passengers by letter if they are nearing double the system average of No Shows, and could soon cross the threshold for suspension consistent with the criteria listed above.

All suspension notices include a copy of this policy, information on disputing No Shows, and how to appeal No Shows and/or suspensions. Passengers who appeal a proposed suspension may continue to ride pending a decision of the appeal. If the appeal is denied, the suspension shall be imposed effective the date the appeal is denied, pending final notification to the passenger.

Suspensions normally begin on a Monday. Violations of the No Show policy within a 12-month rolling period will result in the following suspensions

- First suspension: seven-day suspension
- Second suspension: 14-day suspension
- Third suspension: 21-day suspension
- Fourth (and subsequent) suspension(s): 30-day suspension

## *Appeals*

### *Disputing No Shows*

Passengers wishing to dispute specific No Shows must do so within five business days of receiving a No Show notification letter. Passengers should contact the Dial-a-Ride dispatch office at (509)527-3779, Monday through Friday from 8:00 am to 5:00 pm to explain the circumstances and request the removal of a No Show.

### *Appealing Proposed Suspensions, or Disputed Remaining No Shows*

Passengers wishing to appeal suspensions under this policy have the right to file an appeal request, which must be in writing. Passengers must submit written appeal requests within 10 business days of receiving a suspension letter. Passengers who miss the appeal request deadline will be suspended from service on the date listed on the suspension notice. All suspension appeals follow Valley Transit's appeals process policy.

### *Direct Threat*

Valley Transit will not discriminate based on any protected status. However, if a person is violent, demonstrating seriously disruptive behavior that is not due to a disability, or engaging in illegal conduct on Valley Transit property, they 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) A passenger could also be denied service due to bodily fluids that are not (or cannot) be contained in an appropriate manner and thus put others at risk.

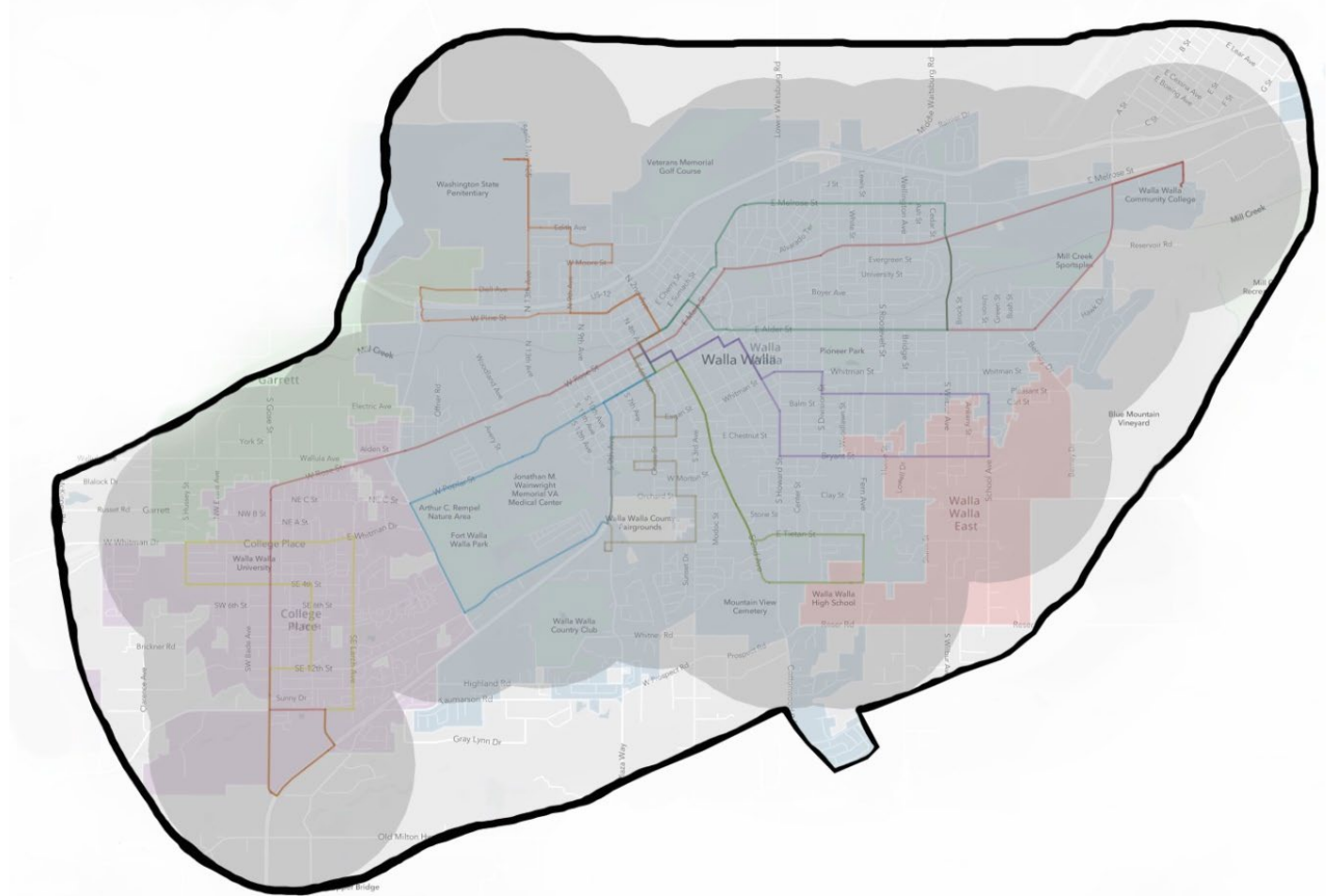
## Prohibited Conduct

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

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

## Appendix A: Service Area and General Information



**Trip Reservation Phone Number:**

509-527-3779

**Hours of Service:**

Monday- Friday 6:15 am to 5:45 pm

**Contact Information:**

Valley Transit  
1401 West Rose Street  
Walla Walla, WA 99362

509-525-9140

[www.valleytransit.com](http://www.valleytransit.com)

**Se Habla Español:**

Adam a 509-525-9140

## Appendix B: 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 C: Reasonable Modification Policy

### ***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***

VT is committed to providing equal access and opportunity to qualified individuals with disabilities in all programs, services, and activities. VT recognizes that in order to have equally effective opportunities and benefits, individuals with disabilities may need reasonable modifications to policies and procedures. VT 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. VT 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. VT 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 VT or be subject to discrimination by VT.

### ***Reasonable Modifications***

A reasonable modification is a change or exception to a policy, practice, or procedure that allows disabled individuals to have equal access to programs, services, and activities. VT will make reasonable modifications to policies, practices, and procedures when necessary to ensure access to transit services for qualified individuals with disabilities, unless:

- Making the accommodation would fundamentally alter the nature of the public transportation service.
- Making the accommodation would create a direct threat to the health or safety of other passengers and/or the driver.
- The individual with a disability is able to fully use VT's service without the accommodation being made.

For the purposes of this section, the term reasonable accommodation shall be interpreted in a manner consistent with the term "reasonable modifications" as set forth in the Americans with Disabilities Act Title II regulations at 28 CFR 35.130(b)(7), and not as it is defined or interpreted for the purposes of employment discrimination under Title I of the ADA (42 U.S.C. 12111–12112) and its implementing regulations at 29 CFR part 1630.

### ***Eligibility Criteria***

An individual is eligible to be considered to receive a reasonable modification if that individual has: a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such impairment; or has been regarded as having such impairment.



### ***Requests for Reasonable Modifications***

VT shall make information about how to contact VT to make requests for reasonable modifications readily available to the public through its website and rider policy guidelines. VT shall follow these procedures in taking requests:

- a. Individuals requesting modifications shall describe what they need in order to use the service.
- b. Individuals requesting modifications are **not** required to use the term “reasonable modification” when making a request. Personnel at VT will determine if the request represents a reasonable modification and proceed in accommodating the request accordingly.
- c. Whenever feasible, VT requests that individuals make such requests for modifications before VT is expected to provide the modified service.
- d. Where a request for modification cannot practicably be made and determined in advance (*e.g.*, because of a condition or barrier at the destination of a Paratransit, Demand Response, or Fixed Route trip of which the individual with a disability was unaware until arriving), operating personnel shall make a determination of whether the modification should be provided at the time of the request. Operating personnel may consult with VT’s management before making a determination to grant or deny the request.

Requests for accommodation may be made either orally or in writing. The reasonable accommodation process begins as soon as the request for accommodation is made.

The request can be submitted in any written format. Alternative means of filing a request, such as personal interviews, phone calls, through a caregiver or personal care attendant, or taped requests, will be made available for persons with disabilities if unable to communicate their request in writing or upon request.

### ***Interactive Process***

When a request for accommodation is made, VT and the individual requesting accommodation must engage in a good-faith interactive process to determine what, if any accommodation shall be provided. The individual and VT must communicate with each other about the request, the process for determining whether an accommodation will be provided, and the potential accommodations. Communication is a priority throughout the entire process.

### ***Time Frame for Processing Requests and Providing Reasonable Modifications***

VT will process requests for reasonable accommodation and then provide accommodations, where appropriate, in as short a time frame as reasonably possible. VT recognizes, however, that the time necessary to process a request will depend on the nature of the accommodation(s) requested and whether it is necessary to obtain supporting information.

### ***Granting Reasonable Modification Requests***

As soon as VT determines that a reasonable accommodation will be provided, that decision shall be immediately communicated to the individual. This notice must be in writing in order to maintain the required information for reporting purposes. Upon request, alternative means of response will be provided.

In choosing among alternatives for meeting nondiscrimination and accessibility requirements with respect to new, altered, or existing facilities, or designated or specified transportation services, VT shall give priority to those methods that offer services, programs, and activities to qualified individuals with disabilities in the most integrated setting appropriate to the needs of individuals with disabilities.

### ***Denying Reasonable Modification Requests***

As soon as VT determines that a request for reasonable accommodation will be denied, VT will communicate the basis for the decision in writing to the individual requesting the modification. The explanation for the denial will clearly state:

- a. the specific reasons for the denial;
- b. any alternative accommodation that may create the same access to transit services as requested by the individual; and
- c. the opportunity to file a complaint relative to VT's decision on the request.

### ***Complaint Process***

VT has a process for investigating and tracking complaints from qualified individuals. These procedures shall be posted on VT's website and will be provided to any individual whom the VT has denied a request for accommodation. The process and any information necessary to file a complaint are readily available at the administration office at 1401 West Rose Street. Alternative means of filing complaints, such as personal interviews, phone calls, or taped requests, will be made available for persons with disabilities if unable to communicate their request in writing or upon request.

Any person who believes she or he has been discriminated against in obtaining a reasonable modification may file a complaint by contacting the administration office at (509) 525-9140 or visiting in person at 1401 West Rose Street. VT investigates complaints received no more than 15 days after receipt. VT will process complaints that are complete. Once the complaint is received, the complainant will receive an acknowledgment of receipt. If more information is needed to resolve the complaint, VT may contact the complainant. The complainant has 15 business days from the date of the letter to send the requested information to Valley Transit.

If VT is not contacted by the complainant or does not receive the additional information within 30 business days, VT may administratively close the complaint. In addition, a complaint may be administratively closed if the complainant no longer wishes to pursue their case.

After VT investigates the complaint, a decision will be rendered in writing to the complainant. VT will issue either a Letter of Closure or a Letter of Finding.

- a. *Letter of Finding* – This letter will summarize the complaint, any interviews conducted regarding the complaint, and explains what actions will be taken by VT to address the complaint.
- b. *Letter of Closure* – This letter will explain why VT has determined that the complaint does not merit accommodation under the Americans with Disabilities Act and that the complaint will be closed.

If the complainant disagrees with the decision of Valley Transit, an opportunity to appeal the decision may be pursued provided the complaint files notice of appeal within 10 days of the initial decision of VT.

In the event of an appeal, the complainant will be granted all due process, including the ability to present additional evidence, present the case in person during an appeal hearing, and be represented by counsel.

***Designated Employee***

VT shall designate one official within the organization responsible for processing reasonable modification requests and handling complaints. This individual is:

Lowell Nee, Operations Manager  
Valley Transit  
1401 West Rose Street  
Walla Walla, WA 99362  
509-525-9140  
lowell@valleytransit.com

***Record Retention***

VT will maintain all records related to reasonable modification requests and denials or appeals for a minimum of six years.