PARATRANSIT PLAN

October 2017

Version 4.0
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General and Contact Information

The following is required general information about Union County Public Transit - the entity responsible for the provision of ADA Paratransit services as described in this plan.

Name of Transit Agency
Community Connection of Northeast Oregon, Inc.
DBA Union County Public Transit
2204 East Penn Avenue
La Grande, OR 97850

Contact Person (questions, comments, concerns, ADA complaints)
Angie Peters
Union County Public Transit Manager
Phone: 541-963-2877
Fax: 541-605-0705
angie@ccno.org
Definitions and References

Every effort was made to keep this document simple; however sometimes 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 ADA, the Americans with Disabilities act of 1990 is the landmark federal legislation that requires providers of Fixed Route services to offer Paratransit.

**Area of Service:** Paratransit is a requirement in a zone extending ¾ of a mile on either side of a Fixed Route line. This zone may not result in a geographic pocket of disservice surrounded by service on all sides - such a zone is to be absorbed. Collectively, this zone is called the Area of Service.

**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 use Paratransit service.

**Equivalence:** Equivalence generally refers to a provider’s obligation to run Paratransit services during the same schedule as Fixed Route(s) it supports. 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. Performed by a trained professional, these assessments are ordered when staff is unable to make a clean 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 Paratransit pick-up and delivery. A full discussion can be found on page 12.

**Paratransit:** Paratransit refers to a provider’s obligation under the ADA to offer and equivalent mobility alternative for people who are prevented from using a Fixed Route due to a disability.

**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 rule; **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.

**Will-Call:** Will-call is a method of trip scheduling featuring a pick-up time that is unknown when the appointment is made. The most common example of this is a doctor’s appointment where the arrival time is known but making a reservation for a return trip would be speculative. In such cases the rider calls when they are ready for the return ride.

As an update, this plan incorporates parts of its previous versions. It is also necessary to cite a specific requirement that Union County Public Transit (UCPT) is subject to. For ease of reference, the following publications may be referenced in this plan:

- Coordinated Public Transit Human Services Transportation Plan (Coordinated Plan)
- Union County Public Transit Fare Study 2014 (Fare Study 2014)
- FTA Circular 4702.1b - Title VI Requirements and Guidelines for Federal Transit Administration Recipients (FTA 4702.1b)
- FTA Circular 9070.1f - Elderly Individuals and Individuals with Disabilities Program Guidance and Application Instructions (FTA 9070.1f)
- Northeast Oregon Public Transit Paratransit Compliance Plan 2011 (Paratransit 2011)
- Union County Public Transit Title VI Plan 2017 (Title VI 2014)
Description of Fixed Route Services

Overview of Populations Served

Union County Demographic Information

<table>
<thead>
<tr>
<th></th>
<th>Union County</th>
<th>% of total</th>
<th>LG/ IC Service Area</th>
<th>State of Oregon</th>
<th>% of total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Populations</td>
<td>26,745</td>
<td></td>
<td>14,077</td>
<td>4,076,350</td>
<td></td>
</tr>
<tr>
<td>Older Adults (aged 65+)</td>
<td>5,429</td>
<td>20.3%</td>
<td>2,280</td>
<td>684,827</td>
<td>16.8%</td>
</tr>
<tr>
<td>Persons with Disability</td>
<td>3,129</td>
<td>11.7%</td>
<td>1,534</td>
<td>415,788</td>
<td>10.2%</td>
</tr>
</tbody>
</table>

Sources: Population Research Center at Portland State University (2015) and Census Quick Facts (2016)

The table above uses both County information provided by Portland state as well as City specific census information to determine to overall need for services in Union County as well as UCPT’s primary Service Area of La Grande and Island City, Oregon. All of UCPT’s Fixed Route services occur within the primary Service Area. There has been a minimal amount of population growth since the last Paratransit Plan update, but the Older Adult population has increased more than 6% and the Persons with Disability has decreased by nearly the same amount.

Route Structure

Union County Public Transit operates Fixed Route, Demand Response, Contract/Charter, and Paratransit services that are the subject of this plan. There is one Fixed Route running from the origin point of Walton Road Business Complex through Eastern Oregon University. This route runs 7:30 am to 5:30 pm, Monday through Friday.
Bus fare is $1 per boarding. These passes are also available for sale: Unlimited Day Pass ($4), 20 Ride Punch Pass ($20), and an Unlimited Monthly Pass ($40). These may be purchased onboard or at the Public Transit Hub.

In accordance with the adopted Title VI plan, the Fixed Route is evaluated against the following standards:

**Vehicle Load:**

The Union County Public Transit Load Standard is 0.70 or less.

**Vehicle Headway:**

Fixed Route headways are 60 minutes. Actual run time is twenty-five minutes (thereby establishing the on-board equivalence in the ADA Paratransit system) resulting in five minutes of recovery at each terminus (10 minutes each hour).

**On Time Performance**

UCPT considers a Fixed Route bus late if it departs a schedule time point five or more minutes later than the published schedule. The published schedule is designed to run between one and two minutes late, allowing for recovery time at the end of each route. UCPT has established an on time performance standard of no less than 85% of all scheduled stops.

**Service Availability**

It is UCPT’s goal to ensure that 74.5% of Union County residents live within ¾ of a mile of a public transit service line. Transit access is determined by mapping all active public transit bus service in the county and then calculating the population (based on 2015 Census data) within a ¾ mile radius of those lines. The information is compared to the total population in Union County. UCPT’s primary Service Area has a population of 14,077. The Paratransit service is available to 100% of the residents living within the Service Area. UCPT makes connections, from the Public Transit Hub, with services in three neighboring counties and beyond via other county service and Greyhound.

**Vehicle Assignment**

UCPT’s strategy for vehicle assignment is based on capacity and modal function. Buses are deployed without bias impacting the protected characteristics of any particular community (age, ethnicity, socioeconomics, etc.). All of UCPT’s vehicles are maintained to the Federal Transit Administration’s *State of Good Repair* standard. In no case does vehicle age serve as a proxy for poor condition in the system.
<table>
<thead>
<tr>
<th>Local #</th>
<th>Vehicle Type</th>
<th>Typical Assignment</th>
</tr>
</thead>
<tbody>
<tr>
<td>2023</td>
<td>Sedan (hybrid)</td>
<td>ADA Paratransit, Demand Response</td>
</tr>
<tr>
<td>2012, 2020, 2025, 2026, 2030</td>
<td>Minivans (modified)</td>
<td>ADA Paratransit, Demand Response</td>
</tr>
<tr>
<td>2022, 2031, 2032</td>
<td>Cutaway Vans</td>
<td>Fixed Route, ADA Paratransit, Demand Response</td>
</tr>
<tr>
<td>2019</td>
<td>Heavy Duty Transit (Trolley)</td>
<td>Fixed Route</td>
</tr>
<tr>
<td>2021</td>
<td>Straight Van (stretcher)</td>
<td>ADA Paratransit, Demand Response</td>
</tr>
<tr>
<td>2027</td>
<td>Sedan</td>
<td>ADA Paratransit, Demand Response</td>
</tr>
</tbody>
</table>

**Demand Response**

Demand Response is rides falling outside of the parameters of Fixed Route and/or Paratransit hours or service area. A couple of examples would be a Brokerage contract medical ride from Elgin (where no formal transit services exist) to La Grande, or an early morning dialysis ride for a person inside of UCPT’s Service Area. These classify as Demand Response because:

- It is provided on an origin to destination basis,
- There is no Intercity, Commuter, or Fixed Route service in the community,
- And it may be provided to a rider who is contract (or not Paratransit) eligible
  - Even if they are Paratransit eligible, the trip may be ineligible due to the time of the service or part of the trip is far outside the area of service.

Due to the nature of the mode, and as the name implies, Demand Response does not feature a formal schedule.

**Contract and Charter Services**

On a case-by-case and space available basis, Union County Public Transit entertains contract and charter services. The system features a formal written procedure for processing requests under 49-CFR-604.6 (Government Agreements), 49-CFR-604.7 (services to Qualified Human Service Organizations) and 46-CFR-604.39 (general Charter services when no registered provider responds as interested in work).

Charter and contract services are responsive to the needs of the prospective customer and therefore do not feature defined schedules, vehicle assignments or service rates. Charter reports required by the FTA from recipients of federal funding are submitted monthly.

**Deviated Fixed Route**

UCPT operates a Deviated Fixed Route on Saturday between 10 am and 6 pm. This means that anyone may request a deviation from the published Fixed Route during that time frame so long as they place their reservation by 3 pm a day in advance. The bus will deviate up to ¼ of a mile on either side of the Fixed Route line (but not exceeding city limits). For more information see the full policy in appendix D.
Description of Paratransit Services
Union County Public Transit provides ADA compliant Paratransit services for eligible individuals in the La Grande and Island City area of services where it also provides Fixed Route. This service, like Fixed Route, operates from 7:30 am to 5:30 pm, Monday through Friday.

Service Area
The map below demonstrates a zone of ¾ of a mile on either side of the Fixed Route service line (dark pink) where Paratransit support is required (the shortened areas exceed city limits and thus UCPT’s formal service area as a provider. The light pink shades indicate areas beyond the agency’s strict ADA obligation where it honors Paratransit services (typically considered to be the communities of La Grande and Island City Oregon).
Paratransit Fare

Union County Public Transit’s Paratransit fare is $2 per boarding. These passes are also available for sale: 20 Ride Punch Pass ($36), and an Unlimited Monthly Pass ($55). These may be purchased onboard or at the Public Transit Hub.

Eligibility

ADA Paratransit service is EXCLUSIVELY for the use of individuals who are prevented from using Fixed Route. This is an important distinction, as the service is not for those who would simply prefer origin to destination service or are inconvenienced by using Fixed Route.

Eligibility for Paratransit is not tied to a certain age or any particular diagnosis of a disability (by itself). Paratransit eligibility is based on an applicant’s level of ability. For example a person using a walker may be perfectly capable of riding on Fixed Route while another passenger who appears outwardly healthy may have a hidden disability (such as narcolepsy) that would qualify them to ride the Paratransit system.

There are a number of other factors that may NOT be considered when determining eligibility (including but not limited to):

- Lack of Fixed Route service in a particular area
- The distance of a rider’s origin or destination from a Fixed Route bus line
- A rider’s affiliation with any particular agency or status as a Veteran
- Inability to drive
- Personal finances

There is an application process to become eligible for ADA Paratransit services. The application is available on-line or can be sent by request (in both English and Spanish). Alternative or accessible formats and staff assistance is available upon request, or you may call TTY at 711 or 1-800-735-2900. UCPT staff has twenty-one days from the day an application is received (all received applications are date stamped) to review and make an eligibility determination. There are four possible eligibility outcomes:

Presumptive Eligibility

Presumptive Eligibility can (and usually does) happen before a prospective rider submits an application. Upon initial contact, staff can typically make an accurate educated guess about the presences of a condition that prevents the use of Fixed Route. Presumptive Eligibility provides full ADA Paratransit service to an applicant for up to twenty-one days while an application is processed. Typically, Presumptive Eligibility is quickly replaced by a more formal finding, and because of this it is sometimes mistaken for Temporary Eligibility. If a determination for any reason were to exceed the twenty-one day period, 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 patient 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 ride Paratransit.

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 an issue riding Fixed Route created by the weather during the winter months, but they are able to utilize it just fine during the summer months. In a case such as this Conditional Eligibility could be awarded for October through April.

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 Paratransit Eligible.

Ineligible

For this finding, a condition that prevents the use of Fixed Route was not presented. An applicant who is found Ineligible may file an appeal within 60 days of the finding. In the event that staff is unable to make a determination, the applicant will be sent Grande Ronde Hospital Physical Therapy for a Functional Assessment by an Occupational or Physical Therapist. All costs of a Functional Assessment and the transportation to and from the appointment are covered by Union County Public Transit.

UCPT honors findings of Paratransit eligibility from other jurisdictions on the same basis as Presumptive Eligibility. For example a rider visiting La Grande from Portland would enjoy up to twenty-one days of the same riding privileges on the local system as they were found eligible at home. After twenty-one days they would need to submit a formal application on the Union County system to continue their eligibility status.

Eligibility Appeals

Should an applicant be found ineligible and disagree with this finding, they have 60 days to file an appeal. Because the initial decision of approval or denial would have been made by the Union County Public Transit Manager or their subordinate, the appeal will be reviewed by another County Manager and/or the Assistant Director for Community Connection of Northeast Oregon, Inc (CCNO).
An appeal may be submitted in writing or verbally. The reviewer will gather facts to reach a finding and/or order a Functional Assessment from Grande Ronde Hospital Physical Therapy or another provider of their choosing. The conclusion of the reviewer will be provided in writing (or accessible format upon request) within 30 days. The decision of the reviewer is final.

**Scheduling and On Time Performance**

UCPT requires Day in Advance scheduling to secure a ride guaranteed by the ADA. Day in Advance means between 10 am and 3 pm the day prior to the trip reservation. On Sunday, UCPT will accept any voicemail request left before 3 pm as having been made a Day in Advance for Monday service. Same Day requests and Add-Ons are considered on a space available basis but they are NOT subject to a guaranteed ride under the Americans with Disabilities Act.

UCPT can schedule rides up to fourteen days in advance. Recurring trips that happen at least weekly and at predictable times may be scheduled on a subscription, or standing order, basis for up to 30 days with renewals available upon request. While UCPT does not employ any restrictions on where a person may take a subscription trip, these sorts of trips may not make up 50% of the overall capacity of trips delivered. An excess of this percentage of capacity would be the only reason a rider could find their use of subscription service restricted.

**Trip Purpose, Priority, and Volume**

For both subscription and regular Paratransit trips, UCPT does not restrict or prioritize trips. A trip to the doctors is given the same importance as a trip to the salon. An eligible passenger may ride anywhere in the service area during the system schedule, 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.

**Promise Window**

At the time a ride reservations is made, the passenger is provided with a commitment from Union County Public Transit to arrive within twenty minutes for pickup. This is referred to as the promise window. While it is the practice of UCPT to not exceed five minutes past the scheduled pickup time this window means that a ride scheduled at 8:30 am will receive a pickup no later than 8:50.

**Courtesy Window or Dwell Time**

UCPT will wait two minutes after arriving to pick up a passenger for the rider to present themselves to ride. This does not mean that the rider needs to load within two minutes, but they need to visually confirm their intent to board within this window. If the Courtesy Window closes without a passenger present to ride, the trip is booked as a No-Show and the driver will proceed to their next scheduled ride.
On Time Performance

On Time Performance in the ADA Paratransit system is considered to be boarding a passenger within the Promise Window discussed on the previous page. Once boarded, On Time Performance is considered to be getting a Paratransit passenger off of the bus within twenty-five minutes. This represents the maximum runtime of a Fixed Route bus from origin to terminus, in light traffic. UCPT’s goal is to deliver 95% of rides on time for boarding and 99% for each disembarkment.

Origin to Destination

This broad description is utilized by the ADA (and UCPT) to meet the needs of each rider. While some may be able to use a more limited version such as Curb-to-Curb service, others may need Door-to-Door service. The purpose is to ensure that each eligible passenger can actually use Paratransit 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 operators and the riders. It is Union County Public 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 or out of a rider’s home
- 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.)

Other operational examples are evaluated on a case-by-case basis. UCPT makes its best effort to fulfill Door-to-Door requests that don’t constitute a fundamental alteration of its service, and the tradeoff is asking riders to observe a strong preference for such requests to be made at least a day in advance (preferable at the time the original ride reservation is scheduled). More along this subject is covered in UCPT’s Reasonable Modification Policy in appendix A.

Trip Denials

When the request is made a Day in Advance, UCPT strives to meet the ADA requirement of providing any ride within the schedule and area of service. There is a further requirement to schedule the ride at the time it is requested if possible or within sixty minutes on either side of the requested time if necessary. If an adjacent time slot is not open within that time, and
UCPT cannot add capacity (a driver and vehicle) to accommodate it, this is considered a Trip Denial. However, if a surrounding time is available but is declined by the rider it is not considered a Trip Denial. That being said, if the first leg of a trip is denied, resulting in a loss of the trip, all subsequent legs are likewise recorded as denials.

A pattern of ADA Trip Denials (same rider, gender, area of town, time of appointment, delivery destination, etc.) would be considered a violation of the American’s with Disabilities Act. Union County Public Transit takes every possible step to avoid trip denials. Additionally, any Trip Denials that might occur are recorded through their ride scheduling software with information on what occurred so it can be reviewed by management and prevented in the future.

**Personal Care Attendants (PCAs)**

Union County Public Transit transports PCAS for free with the passenger’s paid fare. UCPT places no limitation on who may serve as a PCA - with the exception of on duty transit staff. For example, a rider in a wheelchair may appoint another rider who uses a wheelchair as a PCA - no questions asked. UCPT cannot perform the duties of a PCA nor will it provide or recommend one.

**Disability Service Animals**

UCPT welcomes disability service animals. The ADA defines a disability service animal as an animal that has been trained to perform a task which accommodates conditions of an associated passenger’s disability. The ADA recognizes dogs and certain breeds of miniature horses as eligible disability service animals. The animal must remain under the care and control of the passenger at all times.

UCPT will not transport “comfort” or “companion” animals who do not meet the strict ADA definition of disability service animals. Pets may only be transported in FAA approved carriers (cardboard, textile, and other disposable means of conveyance are not acceptable). A pet boarded in an FAA approved carrier is subject to the same restrictions as any other carry on item.

**Guest Riders**

UCPT will transport a traveling companion who is not Paratransit eligible with an eligible rider on a fee for service basis. UCPT will transport more than one companion on a space available and fee for service basis. No limit will be set on how many guests may travel, EXCEPT for the vehicle’s capacity. Because, by nature, Paratransit can be a shared ride service, it is helpful to staff that a rider disclose the intent to bring guest rider(s) at the time of the original ride scheduling to ensure their will be enough room for all riders.
Carry-On Items

Generally, carry-on items are limited to what the passenger can independently carry on to 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 necessary to allow another passenger to ride.

Union County Public Transit drivers may assist with carry-on items within the following limitations:

- Assistance is limited to getting the items on and off the bus.
- UCPT will not load or transport items that cannot (in the driver’s estimation) be safely stowed for the ride.
- UCPT will not allow items to be secured to the exterior of its vehicles for transport (except bicycles on buses with racks that have been designed and mounted for that purpose).
- UCPT will not assist with an item that (in the driver’s estimation) exceed 25 pounds in weight.

Personal mobility Devices

In order to be eligible for transport, wheelchair and scooters must Not pose a legitimate safety risk relative to the limitations of our ADA-compliant equipment. For example, UCPT will not transport a wheelchair that doesn’t fit entirely within the width of its ramps/lifts. Likewise they will not attempt to board a passenger and mobility device with a combined weight that exceeds the weight capacity of its ramps/lifts. Passengers with large, heavy, or asymmetric equipment are encouraged to call a day in advance for a staff assessment.

Securements and Restraints

UCPT’s driver is exclusively responsible for securing mobility devices into agency vehicles. It is there policy that all mobility devices be secured for transport. However, the ADA recognizes the mobility device as an extension of the occupant’s person, and thus they have the right to refuse securement.

It is the policy of UCPT for all passengers to use safety belts and shoulder restraints in the vehicles where they are available. The ADA recognizes a passenger’s right to refuse these restraints. It is the strong preference of UCPT that a rider who chooses not to utilize these safety features supply their state issued card exempting them from use. Securements and restraints are the default expectation for all UCPT drivers (irrespective of the number of previous times such safety considerations have been declined by the passenger).
Service Interruptions
Cancels, Late Cancels, and No Shows

A cancellation if any trip reservation that is canceled at least an hour before the scheduled pickup time. Cancellations can be made by calling the Public Transit Hub and even by leaving a voicemail if the cancellation must be made afterhours.

A Late Cancel occurs when a cancellation is made with less than an hour until the scheduled pickup. A voicemail cancellation could incur a late cancel if the time the message was left is not more than an hour previous to the scheduled ride.

A No Show is when the driver arrives to pick up a passenger who does not present themselves during the Courtesy Window. Cancelling with the driver at the door is also considered a No Show, and all cancellations should be handled by calling to speak with a rider scheduler who can alter the schedule.

A pattern of No Shows or Late Cancels on subscribed trips may result in the automatic cancellation of pending and future subscriptions. A passenger subject to a suspension is notified in writing. They have the same right of appeal as a passenger who has been found ineligible for Paratransit. They may appeal in writing or another format through another County Manager or the Assistant Director of CCNO.

A pattern of No Shows or Late Cancels on non-subscribed trips may result in a written suspension warning or suspension if a warning has already been issued. However, UCPT approaches suspensions very reluctantly, and in all cases they must be contextually sensitive. For example if a rider has three No Shows in a month and only takes fifteen trips they would be both above the system norm and have a more significant percentage of No Shows than a rider who also has three No Shows but takes one hundred trips in a month.

Each case for a potential suspension is considered on its own merits and within demonstrable system context. In no case shall as suspension be disproportional to the pattern of disruption for which it is attempting to inspire correction. Additionally, no window of suspension will ever exceed thirty days. A passenger who is suspended for No Shows and/or Late Cancels has the same right of appeal as a passenger who is found ineligible to use Paratransit. Should an appeal be requested, service will provided during the determination process, similarly to the eligibility application process.

Refusal of Service

Union County Public Transit shall not discriminate based on any protected status. However, refusal of service can result from illegal conduct or actions that pose a direct threat to the safety of the driver or other passengers. A passenger may also be refused service due to a mobility device that cannot be safely loaded or transported and/or bodily fluids that are not (or cannot) be contained in an appropriate manner. A passenger denied service has the same right of appeal as a passenger found otherwise ineligible for service.
Prohibited Conduct

In addition to the previous provisions, passenger on the Paratransit may be subject to refusal of service for the following prohibited behaviors:

- Smoking or Spitting on the bus
- Fighting, pushing, shouting or engaging in disruptive behavior (not disability related)
- Taunting, bullying, or use of vulgar/offensive language with other passengers and/or staff (not caused by a disability such as Turrets)
- Throwing objects
- Engaging in illegal activities
- Carrying hazardous object, firearms, or weapons
- Playing musical instruments or devices (personal music devices are okay with the use of headphones)
- Transporting any materials that my harm others
Appendix A: Union County Public Transit Reasonable Modification Policy

Purpose

The purpose of the reasonable modification policy is to ensure that Union County Public Transit (UCPT) 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

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

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. UCPT 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.
- The individual with a disability is able to fully use UCPT'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 been regarded as having such impairment.

Requests for Reasonable Modifications

UCPT shall make information about how to contact UCPT to make requests for reasonable modifications readily available to the public through its website and rider policy guidelines. UCPT 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 UCPT will determine if the request represents a reasonable modification and proceed in accommodating the request accordingly.

c. Whenever feasible, UCPT requests that individuals make such requests for modifications before UCPT 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 UCPT’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, 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, UCPT and the individual requesting an accommodation must engage in a good faith interactive process to determine what, if any accommodation shall be provided. The individual and the UCPT 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 Modification

UCPT will process requests for reasonable accommodation and then provide accommodations, where appropriate, in as short a time frame as reasonably possible. UCPT 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 a Reasonable Modification Request

As soon as UCPT 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, UCPT 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 a Reasonable Modification Request

As soon as UCPT determines that a request for reasonable accommodation will be denied, UCPT 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 UCPT’s decision on the request.
Complaint Process

UCPT has a process for investigating and tracking complaints from qualified individuals. These procedures shall be posted on the UCPT’s website and will be provided to any individual where the UCPT has denied a request for accommodation. The process and any forms necessary to file a complaint are readily available from the web. 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 completing and submitting a UCPT’s Reasonable Modification Complaint Form. UCPT investigates complaints received no more than 30 days after receipt. UCPT will process complaints that are complete. Once the complaint is received, the complainant will receive an acknowledgement of receipt. If more information is needed to resolve the complaint, UCPT may contact the complainant. The complainant has 30 business days from the date of the letter to send requested information to Union County Public Transit.

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

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

d. *Letter of Finding* - This letter will summarizes the complaint, any interviews conducted regarding the complaint, and explains what actions will be taken by UCPT to address the complaint.

e. *Letter of Closure* - This letter will explain why UCPT 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 Union County Public Transit, an opportunity to appeal the decision may be pursued provided the complaint files notice of appeal within 21 days of the initial decision of UCPT.

In the event of 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 to be represented by counsel.
Designated Employee

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

Angie Peters, Public Transit Manager
Union County Public Transit
2204 East Penn Ave
La Grande, OR 97850
541-663-7144 Ext. 158
angie@ccno.org

Record Retention

UCPT will maintain all records related to reasonable modification requests and denials for at least three (3) years.
Appendix B: Paratransit Application

PARATRANSIT APPLICATION

October 2017
Union County Public Transit Paratransit service provides mobility to people who are certified as eligible under the standards of the Americans with Disabilities Act (ADA). The ADA strictly limits Paratransit to people who are Prevented from using Fixed Route due to a disabling condition. By definition, eligibility is NOT based on:

- Age alone
- A disability or diagnosis itself
- Lack of Fixed Route service in a particular area of town
- The distance of your origin or destination from a Fixed Route bus line
- Your affiliation with any particular agency or status as a Veteran
- Inability to drive
- Personal finances

The basis for the eligibility decision is your ability to use Union County Public Transit’s (UCPT) regular Fixed Route and the most limiting conditions presented by your disability and the environment. Eligibility may be granted on the following basis:

- Unconditional - the passenger may use Paratransit for all trips
- Conditional - the passenger may use Paratransit under some conditions for some trips
- Temporary - the passenger may have conditional or unconditional eligibility for a defined period of time because limitations are expected to change

The UCPT evaluation process includes:

1. Submission of a completed application packet.
2. Verification review by UCPT Staff - which may include follow-up paperwork.
3. Optional, in-person evaluation by UCPT Eligibility Staff.
4. Optional, functional assessment by a licensed health care professional.

**Personal Care Attendants (PCA)**

If you require a PCA in any daily life function it is recommended that your PCA accompany to your Paratransit evaluations or assessment. **UCPT staff is not trained and is unable to assist you with personal care needs.** Your PCA will always ride free of charge with you. If you require transportation to an evaluation or assessment in regards to this application, UCPT will provide Paratransit to and from your appointment at no charge.

**Notice of Determination**

You will be notified of the eligibility determination by letter (or accessible format upon request) within twenty-one days after completion of the evaluation process. If you are eligible you will also receive a Paratransit Rider’s Guide, an identification card, and information on how to use the service. During the application process you will be eligible for Paratransit service under Presumptive Eligibility.
Appeals Process

Applicants who are determined to be ineligible, or do not agree with the conditions established for their use of Paratransit, may request an appeal, in writing or in another format. The appeal must be filed within sixty-five days from the date of the initial determination. Further information on how to request an appeal will be included with the eligibility determination letter.

Instructions

1. If you feel you qualify for Paratransit Services, you or your representative should complete this application. **Answer all questions completely and to the best of your ability.**
2. Be sure to sign the application. Incomplete or unsigned applications will be returned.
3. Complete and sign the **Medical Release Form.**
   a. **NOTE:** This is not a request for medical records or a requirement for a signature from your health care professional. Once the application has been received, your health care professional may be contacted to provide information about your level of ability.
4. Return the completed application in person at the Public Transit Hub, through your driver, or via the U.S. postal service to the Public Transit Hub.
5. After you application has been reviewed, you will be contacted by phone to schedule any necessary evaluations or assessments.

Questions? Please call the UCPT office at 541-963-2877 from 8 am to 5 pm Monday through Friday. Materials are available in large print and other alternative formats. Assistance for non-English speaking applicants is also available. For alternative formats of this document please request via 541-963-2877, or call TTY at 711 or 1-800-735-2900.

Application

**Personal Information**

Name: Last________________________ First__________________________ Middle Initial_____

Home Address: __________________________________________________________ Apt. #: _____________

Name of facility or apartment building: ____________________________

City: ______________________________________ State: OR Zip: ______________________

Mailing Address (if different): ____________________________________________________________________________

City: ______________________________________ State: OR Zip: ______________________

Home Phone: _______-_______-_________ Other: _______-_______-_________

Date of Birth: ___________________________ □ Male □ Female
Contact Person (optional)

Emergency Contact Person: __________________________________________________________

Relationship to Applicant: __________________________________________________________________________________________

Emergency Number(s): Primary________________________________ Other________________________________________

Regular Bus Service Use

1. Are you aware that all UCPT Fixed Route vehicles are fully accessible for mobility devices and for those who are unable to climb the bus steps?
   - Yes  
   - No

2. Are you able to reach the UCPT bus stop nearest to you home?
   - Yes  
   - No  
   - Sometimes
     If sometimes, please explain: __________________________________________________________

3. What best describes your ability to use UCPT’s regular Fixed Route service?
   - I can use Fixed Route for most of my transportation needs
   - I have never attempted to use Fixed Route
   - I could use Fixed Route but it would be difficult because: __________________________________________________________
   - I can use Fixed Route for specific destinations because: __________________________________________________________
   - I cannot use Fixed Route without the help of a personal care attendant
   - I cannot use Fixed Route at all because: __________________________________________________________

Your Travel Abilities and Needs

1. I can wait for up to 15 minutes at a Fixed Route bus stop.
   - Yes
   - Yes, but only with a seat or shelter
   - Not sure
   - Sometimes/no (please explain): __________________________________________________________

2. I can get on and off a Fixed Route bus (all buses feature lifts and/or ramps that can be used by anyone including those who cannot climb steps or need a mobility devices).
   - Yes
   - Not Sure
   - Sometimes/No (please explain):

3. I can get to a seat or a wheelchair/scooter station position once I’ve boarded the bus.
   - Yes
   - Not Sure
   - Sometimes/No (please explain):

4. I can follow written or oral instructions about how to use the bus.
   - Yes
   - Not Sure
   - Sometimes/No (please explain):

5. I can identify when it is time to get on or off the bus.

6. Yes
   - Not Sure
   - Sometimes/No (please explain):________________________________________________________
**Information About Your Disability or Condition**

1. What is the primary disability or health condition that prevents you from using a UCPT Fixed Route bus? Please be specific (for example: stroke, emphysema, etc.):
   __________________________________________
   __________________________________________

2. Do you have any other physical or cognitive conditions that limit your ability to use Fixed Route?
   □ Yes □ No
   If yes, please explain: ______________________________________________________

3. Do the effects of your disability vary from day to day?
   □ Yes □ No
   If yes, please explain: ______________________________________________________

4. Is your disability or condition:
   □ Permanent □ Temporary (How long: ____________ Months ____________ Years)
   If temporary, please explain: _________________________________________________

**Mobility Equipment and Personal Care Attendants**

1. Please Check any and all mobility equipment that you expect to use when you travel:
   □ None □ Manual Wheelchair □ Service Animal
   □ Cane □ Power Wheelchair □ Portable Oxygen
   □ Walker □ Power Scooter □ Respirator
   □ Crutches □ Extended Footrests □ Picture Board
   □ White Cane □ Chest Restraint □ Alphabet Board
   □ Other (please describe): ________________________________________________

2. If you use a scooter/wheelchair, are you able to transfer to a seat in a vehicle?
   □ yes □ No

3. If you use a scooter/wheelchair, is it more than 30 inches wide, and/or more than 48 inches long?
   □ Yes □ No □ Not Sure

4. If you use a scooter/wheelchair, is the total combined weight of you and your mobility device more than 600 pounds?
   □ Yes □ No □ Not Sure

5. UCPT operators/drivers are unable to perform the duties of a personal care attendant (PCA). Will you need to travel with a PCA or someone else to assist you if you use Paratransit services?
   □ Sometimes □ Always □ Never

6. Some people cannot be left alone at their residence or other destinations (for example, those living with Alzheimer’s or dementia). Does someone always need to meet you when you arrive at a destination?
   □ Yes □ No
Your Functional Capabilities

1. How far are you able to travel on a flat surface, either on your own or by using your regular mobility aid, and without the help of another person?
   - ☐ I am not able to travel at all without help from another person
   - ☐ I am severely restricted and can travel only within my home
   - ☐ I can get to the curb in front of my home or apartment
   - ☐ I can go one city block
   - ☐ I can go two city blocks
   - ☐ I can go four city blocks
   - ☐ I can go eight city blocks
   - ☐ I can go twelve city blocks or more

   Please describe any conditions when you are unable to travel this far:
   ______________________________________________________________
   ______________________________________________________________
   ______________________________________________________________

2. Please check any conditions that affect your ability to get to and from a Fixed Route stop, or to and from a destination using a Fixed Route bus. Due to the nature of my disability, in order to travel, I must
   - ☐ Avoid inclines
   - ☐ Avoid steep hills
   - ☐ Avoid hours of darkness
   - ☐ Be on a pathway with an even surface
   - ☐ Other (please explain):
   ______________________________________________________________

3. Please check the specific weather conditions that (because of your disability) prevent you from using Fixed Route:
   - ☐ Snow
   - ☐ Ice
   - ☐ Heat: Above ____ degrees Fahrenheit
   - ☐ Cold: Below ____ degrees Fahrenheit
   - ☐ The weather does not affect my disability

Medical Release Authorization Form

It may be necessary for UCPT to contact a health professional who is familiar with your disability or health condition. Please complete and sign the enclosed Medical Release Authorization for Use and Disclosure of Protected Health Information. UCPT will not release any medical information obtained with the release(s) you provide to any other party.

Please Read Below Before Signing the Application

Applications must be signed; unsigned applications will be returned. By signing, you are agreeing to the following:

I understand the purpose of this application is to determine whether I am eligible to use UCPT’s Paratransit Services. I certify that the information in this application is true and correct. I understand that providing false information may result in denial of service as well as penalty under the law. I understand that information I provided will be disclosed only as needed to evaluate eligibility unless I give other specific authorization.
I understand that it may be necessary for me to participate in an in-person evaluation, a functional assessment, or both at UCPT’s expense and discretion, in order to determine my eligibility for Paratransit Services.

If I am found eligible or conditionally eligible, I understand that UCPT will periodically audit, update, reevaluate and purge its Paratransit caseload. I understand that my eligibility may be pulled for redetermination at any time. I understand that redetermination may result in a finding that I am no longer eligible to receive Paratransit services.

**If a legal representative signs this application:**

I acknowledge that I may be present with the applicant during evaluations or assessments, or I may designate someone to be present on my behalf.

_________________________________________________________________________________

Applicant or Legal Representative               Date

**If this application is completed by someone other than the applicant:**

Relationship to the applicant: _______________________________________________________

Name: _____________________________________________________________

Address: _____________________________________________________________

Phone: ____-____-_____ Other: ____-____-_____ Organization/Agency: _________________

I have knowledge of the applicant’s disability or health condition:  ☐ Yes  ☐ No

I am aware of how the applicant’s health condition or disability prevents the use of a regular Fixed Route transit system:  ☐ Yes  ☐ No

_________________________________________________________________________________

Representative Signature               Date

**Returning the Application**

Before returning your application, please be sure that you have answered all of the questions, you have signed the application and the Medical Release Form, and if another person (not the applicant) completed the application, that person has completed and signed the previous section.

To submit your application to the Public Transit hub you may bring it in person, give it to your driver, or send it through the U.S. Postal Service to:

Union County Public Transit
2204 East Penn Avenue
La Grande Oregon 97850
Medical Release

All sections must be completed.

I, __________________________ authorize:

(Applicant or Patient Name)
Name of professional______________________
Address________________________________________
Phone ________________________ Fax __________________

To disclose Protected Health Information (PHI) to Union County Public Transit’s Paratransit Program (Paratransit), 2204 East Penn Avenue, La Grande, OR 97850, for the purpose of assessing my eligibility under the American’s with Disabilities Act for Paratransit services. Only those persons with disabilities that prevent their use of regular Fixed Route services are eligible for Paratransit.

My PHI may include medical records, diagnostic reports, physical therapy records, and any personal and medical information pertinent to my application for Paratransit eligibility. If the information to be disclosed contains any of the types of records or information listed below, additional laws relating to the use and disclosure of the information may apply. I understand and agree that this information will be disclosed only if I place my initials in the space next to the type of information:

__________ Chemical Dependency
__________ Sexually transmitted diseases
__________ HIV/AIDS
__________ Genetic Information
__________ Mental Health (excluding psychotherapy notes)
__________ Reproductive Health (excluding abortion)

I may cancel this authorization at any time by sending a written request to the Paratransit program, 2204 East Penn Avenue, La Grande, OR 97850. My cancellation of this authorization will not affect any uses or disclosures made before my request is received. If I do not revoke this authorization, it will automatically expire 90 days after the date of signature.

I understand that I am not legally obligated to sign this application and that Paratransit will not refuse to accept my application based on my refusal to sign this document. I also understand that if Paratransit is unable to obtain information necessary to determine my disability or health condition and how it prevents me from using Fixed Route, my application for eligibility may not be processed, or if processed, I may be found ineligible.

I understand that the information used or disclosed pursuant to this authorization may be subject to re-disclosure and no longer be legally protected. However, I also understand that federal or state law my restrict re-disclosure of HIV/AIDS information, mental health information, genetic information, and drug/alcohol information.

I understand that by signing this statement I am authorizing Union County Public Transit and its parent corporation, Community Connection of Northeast Oregon, Inc. to provide a copy of this statement to the above listed professional for the purposes of compliance with the Health Insurance Portability and Accountability Act (HIPAA).

____________________________________________________________________________________

Applicant or Legal Representative Date

Applicant’s Date of Birth: ____________________________________
Sometimes transit uses terms to describe services that are difficult to understand. We have tried to keep this guide jargon free but it is often necessary to use a term to show compliance with a standard (such as Americans with Disabilities Act). The following list is provided for ease of reference where such terminology was unavoidable.

**ADA** - Americans with Disabilities Act. The ADA provides the framework of our responsibility to provide Paratransit Services.

**Add-On** - An Add-On is a classification of trip that we provide from time to time on a space available basis. While it is provided in the Paratransit system, it is not subject to the ADA guarantee.

**Paratransit** - Sometimes called Complementary Paratransit, the term refers to our obligation under the Americans with Disabilities act to provide a transportation alternative for people who are prevented from using a fixed route due to a disability.

**Area of Service** - A zone extending ¾ of a mile on either side of a fixed route line within which we provide Paratransit services.

**Dial-a-Ride** - Dial-a-Ride is the method by which we provide Paratransit services.

**Day In Advance** - Day In Advance refers to your obligation to schedule a Paratransit ride the previous day. We accept ride requests between 10:00 am and 3:00 pm Monday through Friday.

Trip requests received via voicemail after 3:00 pm on Saturday but before 3:00 pm on Sunday for the following week are considered to have been made a Day In Advance.

**Eligibility** - Eligibility is the process by which a rider can apply to use our Paratransit service.

**Equivalence** - Equivalence generally refers to our obligation to run Paratransit service during the same schedule as the fixed route it support. It is also occasionally used to refer to our obligation to provide enough capacity (drivers and buses) to meet the needs of riders who scheduled the previous day.

**Functional Assessment** - A Functional Assessments is an evaluation of your abilities performed by a trained professional. These assessments are typically ordered when staff has unanswered questions about your eligibility.

**Origin to Destination** - Origin to Destination is the ADA standard by which we deliver Paratransit services. A full discussion of Origin to Destination is included on page 11.

**Promise Window** - The Promise Window is our estimation of when a vehicle will arrive to perform a pickup within a 20 minute zone of certainty. For example a ride request of 10:30 AM may result in a Promise Window between 10:30 and 10:50. While we
rarely arrive more than five minutes from the opening of the Promise Window it is best to schedule trips and watch for the bus accordingly.

**Trip Denial** - A trip denial occurs when three circumstances are met:

1) The trip request is presented in a manner consistent with our Day in Advance policy; AND

2) All the trip slots up to an hour before and up to an hour after the requested time are full; AND

3) We are unable to bring in an extra driver and vehicle to accommodate the trip within one hour on either side of the original request time.

We actively seek to avoid Trip Denials.

**Will-Call** - Will-Calls are a special classification of trip where the pickup time is unknown at the time an appointment is made.

For example, you may know when you need to be to a doctor’s appointment but will not necessarily know when you will finish and be ready to go home. Will-Call trips are kept to a minimum in our scheduling system; with the exception of the trip home our call takers will ask you to estimate a pickup time for each requested boarding.

For alternative formats of this document please request via 541-963-2877, or call TTY at 711 or 1-800-735-2900.

**SERVICE SUMMARY:**

The mission of Paratransit is to integrate people of all abilities into public transit. We are obligated by the ADA to limit Paratransit to those who are "PREVENTED" from using a fixed route by a disabling condition. Paratransit is not for those who are inconvenienced by a fixed route or prefer origin to destination service.

Paratransit is open to eligible passengers with origins and destinations within our service area (defined as ¾ of a mile on either side of a fixed route line). 90% of our fleet is accessible to wheelchairs and other mobility devices. All of our drivers have been trained to proficiency with our accessibility equipment.

**CAN I GET A LIFT?**

Paratransit eligibility is based on your ability to use a fixed route. It is not based any specific diagnosis. An application is available at 2204 East Penn Avenue in La Grande, or online at www.neotransit.org. We will provide a staff member to help complete the application or offer an alternative format upon request. All information is kept confidential. You will be notified in writing of an eligibility finding no later than 21 days after we receive your application. Incomplete or illegible applications will be returned.
**Hours of Service**

Paratransit operates Monday through Friday from 7:30 am to 5:30 pm and 10:00 am to 6:00 pm on Saturday via a deviated Fixed Route.

**Service Area**

The service area of Paratransit is ¾ of a mile from any fixed route point. The service area is strictly enforced by the geo-coding in our software. Rides outside our area of service may be available but they are not subject to the ADA guarantee.

The ADA doesn’t allow us to consider the distance of your origin (or destination) from the nearest bus line in determining eligibility. People who are prevented from using a fixed route will be found eligible if they live 50 miles from the nearest line (they’re eligible when visiting the Service Area). Conversely, a person who is not prevented from using a fixed route will not be found eligible based on the distance he or she has to travel to get to a bus line.

**Types of Eligibility**

There are four outcomes to your application:

1. Temporarily Eligible
2. Eligible
3. Ineligible
4. Conditionally Eligible

Eligibility is based exclusively upon your ability to use a fixed route system. Eligibility is NOT based on...

- Age
- Any specific diagnosis or set of diagnoses
- Lack of bus service to any particular area
- Any agency affiliation or Veterans status
- Inability to drive
- Personal finances

**Temporary Eligibility (sometimes called Presumptive Eligibility)**

Temporary Eligibility usually occurs upon request. After an informal interview a call taker may believe you have an eligible condition. If so, you are considered Temporarily Eligible until we receive and review your application.
We’ll mail you a Temporary Eligibility Card the same day so that you may begin using the service. Temporary Eligibility will expire in 21 days or when a more formal finding has been made (whichever comes first). If a more formal finding has not been reached in 21 days, Temporary Eligibility automatically extends pending the outcome of a formal finding.

Eligibility

Eligibility is a finding that a mobility limiting condition exists that prevents use of a fixed route system and is not likely to improve. This covers a broad range of conditions including physical, cognitive, sensorial, psychological and others.

Eligibility is reviewed periodically. This is done so we can ensure that we have the most current contact information on file as well as making note of any changes to your mobility needs (i.e. use of a cane to a wheelchair). Upon reassessment, an extension may be granted or we may find that a passenger is no longer Paratransit eligible.

Conditional Eligibility

Conditional eligibility exists when a passenger is prevented from using a fixed route for some, but not all trips or when the condition is likely to improve. A passenger who has recently had knee replacement may be conditionally eligible until the underlying condition improves.

A passenger may be greatly affected by inclement weather due to severe arthritis. Riding fixed route during the summer may not be an issue, but they may be PREVENTED during the winter. The passenger may then be found Conditionally Eligible from October to April with a standard periodic reassessment.

In the event that Conditional Eligibility is found, the Paratransit identification card will note the conditions under which a passenger is eligible to ride.

Ineligible

Ineligibility is a finding that the applicant is not PREVENTED from using a fixed route due to a disability.

Applicants who have been found ineligible and disagree with the finding have 60 days to file an appeal. An appeal does not guarantee approval after review. See below.

Determination of Eligibility

Staff will review completed applications for clear indicators of eligibility. You’ll receive notification in writing or requested accessible format within 21 days. If you’re eligible we’ll send an ID card with your name, address, expiration date and conditions of your eligibility. Please inspect for errors and keep it in a safe place.

Sometimes we’ll need to ask for additional information or send you to a specialist to conduct a Functional Assessment. If ordered, a Functional Assessment will be performed by Grande
Ronde Hospital Physical Therapy in La Grande. The assessment and transport to and from the facility will be provided to you free of charge.

**DENIAL REVIEW AND APPEALS**

If you disagree with your determination of eligibility you have 60 days to file an appeal with the Union County Transit Manager. He or she may gather other facts to reach a finding and/or order a Functional Assessment from Mountain Valley Physical Therapy or another provider of his or her choosing. The conclusions of the Transit Manager will be provided to you in writing (or accessible format upon request) within 30 days. The decision of the Transit Manager is final.

**HOW TO USE PARATRANSIT**

**SCHEDULING A RIDE**

Trip planners are available Mon-Fri from 10:00 AM to 3:00 PM. Simply schedule **A DAY IN ADVANCE**. Requests received on Saturday after 3:00 pm and before Sunday at 3:00 pm (by a call taker or via voicemail) for the following week are considered to have been made a day in advance.

Ride requests received outside the trip planning hours are considered **Add-On**. **Add-On trips are assigned on a space available basis and not subject to guarantee under the ADA.**

Trips are dispatched via Mobile Data Computers (a one way medium). Drivers can’t change any particular aspect of a trip. Trip changes can only be arranged through the call center.

For your convenience, we’ll consider your reservation up to 14 days in advance.

**TYPES OF TRIPS**

We offer three types of trips; simple, compound and subscription.

**Simple Trips**

Simple trips are from one point to another and back. A trip to the Post Office and back home is a simple trip.

**Compound Trips**

Compound trips are those that require more stops. From home to the post office, the post office to the bank, the bank to the grocery store and the store to home is a compound trip.

Compound trips are NOT eligible for Subscription service.

Each leg of your trip must be scheduled at the time you call for an appointment (only your return ride home remains open in “Will-Call” status). When scheduling a compound trip it is important to allow yourself enough time to finish your business at each destination to prevent receiving a no-show.

Sometimes you may find the need for an additional trip on the end of your Will-Call. For example, when you finish with a doctor appointment you may need to make an
unexpected pharmacy run. The extra trip is considered an Add-On that (for understandable reasons) could not be scheduled a day in advance. For best results, schedule the Add-On through the call center as soon as possible; we'll accommodate as soon as the space is available.

Alternatively, you may change your “Will-Call” destination. The unique properties of a Will-Call trip in the system allows for flexibility but you need to be aware of the potential hazards...

Irrespective of where the driver delivers you from the Will-Call, our obligation under the ADA is satisfied. That means your trip home from the pharmacy becomes the Add-On - which is not subject to the ADA guarantee.

**Subscription Trips**

Recurring rides can be scheduled on an on-going (or subscription) basis provided they meet two conditions:

1) It must be a simple trip occurring at predictable intervals (day, week, etc.)
2) It must occur weekly (or more frequently).

The advantage to subscribing a trip is that you will not need to call in a day in advance to reserve it.

**A Word About Trip Denials**

Union County Public Transit is obligated under the Americans with Disabilities Act to accommodate every Paratransit ride request, made by an eligible passenger, within our schedule and area of service, when it is made a day in advance.

The ADA requires us to provide a ride at the requested time if it is available. If not, we are obligated to offer surrounding open time spots. If an adjacent time is not open within one hour on either side of a requested reservation, we are required to add capacity (driver and vehicle) to accommodate it. Failure to do so is considered a trip denial under the ADA.

Note... If a surrounding time is available but doesn’t work for the rider (that is, he or she declines) it is not considered a trip denial. However, if the first leg of a trips is denied resulting in a loss of the trip, all subsequent legs are likewise recorded as denials.

A pattern of ADA Trip Denials (same rider, gender, area of town, time of appointment, delivery destination, etc.) would be considered a violation of the Americans with Disabilities Act. Union County Public Transit will take every possible step to avoid an ADA Trip Denial.

**A Word About Trip Purpose, Priority and Volume**

Union County Public Transit does not restrict or prioritize trips. A ride to the candy store is just as important as a ride to the dentist. A passenger may request unlimited trips (so long as they are compliant with our scheduling rules).
A Word About Origin to Destination

The Americans with Disabilities Act was intentionally drafted with the vague term “Origin to Destination” to describe a passenger trip to avoid passively limiting terms used by providers (such as “Curb-to-Curb”). Moreover, the ADA wishes to ensure that an eligible passenger can actually use Paratransit within the published area and schedule of service.

It is reasonable to expect that Origin to Destination will mean Door-to-Door for some riders or locations and Curb-to-Curb may work better for others. This is exactly the sort of detail the ADA leaves to local operators and riders. The ADA recognizes that arranging for assistance beyond the curb takes additional time and that it is reasonable to ask for advance notice from a passenger who has need of it.

The ADA does NOT require transit providers to fundamentally alter the nature of their service to make an accommodation. Cited examples include:

- Assistance through a door and into or out of a building
- Leaving a vehicle unattended for a lengthy period of time
- Losing the ability to keep an unattended vehicle in line of site
- Actions that are unsafe (backing down a narrow alley, etc.)

Other operational examples are evaluated on a case-by-case basis.

The bottom line is Union County Public Transit will make its best effort to fulfill a Door-to-Door request that does not constitute a fundamental alteration of our basic service. All that we ask in return is that you observe our strong preference for such requests to be made at least a day in advance (preferably at the time the original ride reservation is scheduled).

READY TO ROLL:

A Paratransit appointment is our estimate of arrival within a 20 minute margin of error called a Promise Window. If you accept a ride reservation for 2:15 PM your ride scheduler will inform you that your Promise Window is 2:15 PM to 2:35 PM. It is rare for us to arrive more than five minutes beyond the opening of the Promise Window. Since our driver has limited dwell time (see next topic) you should be ready to ride early.

Courtesy Window (“Dwell Time”)

Our Courtesy Window, sometimes called “Dwell Time” is two minutes (meaning we will wait two minutes after arrival for you to appear before proceeding to our next scheduled rider).

IMPORTANT… This is not to say that you must load in two minutes. Simply appear to indicate to the driver that you intend to keep your appointment. It’s important to keep an eye open for the bus because unless you specifically requested Door-to-Door service at the time you make your reservation, the driver will not knock on your door to announce arrival.

If the Courtesy Window closes before you appear, your trip will be booked as a “No-Show” and you will need to schedule another appointment. Our drivers are not available to return.
**BUS FARE**

Paratransit costs $2.00 per direction ($4.00 Round Trip). A 20 punch pass for $36, and an unlimited monthly pass is $55.00.

**CARRY-ON ITEMS**

Our drivers will happily assist you with your carry-on items within a few limitations.

1. Carry on assistance is limited to getting your items on and off the bus - sorry, we can’t help you in with the groceries...

2. We will NOT transport any carry on item that cannot be safely stowed for travel (in the driver’s estimation).

3. **Our driver will NOT assist with any item that in his or her estimation exceeds 25 pounds in weight.**

If you go shopping and will be returning with more items then you can carry, we encourage you to arrange a Personal Care Attendant to ride with you (see next topic).

**PERSONAL CARE ATTENDANTS**

We will transport a care attendant free of charge with your paid fare. **Public Transit will not provide a care attendant nor is our driver qualified to fill this role.**

**GUEST RIDERS**

We will transport a traveling companion who is not a care provider with you on a fare for service basis. More than one companion may be transported on a space available and fare for service basis.

**CANCELLATION AND NO-SHOWS**

If you are unable to make a scheduled ride, you must notify us at least an hour before pickup to avoid a “No-Show”. Our drivers **CANNOT** make scheduling changes. If you need to cancel a ride outside of office hours, please dial (541) 963-BUSS to leave a voice mail message.

A No-Show or pattern of Late Cancels on a subscripted trip may result in the automatic cancellation of pending and future subscriptions. A passenger who has future subscriptions canceled is subject to the same rights of appeal as a rider who is suspended or found ineligible for service - see page 8.

A passenger accruing 3 No Shows, or a pattern of Late Cancels in excess of system norms or both during a given month may receive a suspension warning.

UC Public Transit approaches suspensions VERY reluctantly - and then only in a context sensitive manner. Three no shows in a month would be out of system norms for someone who rides 20 times a month. However, they may be inconsequential for someone who rides 200 times a month. Our trip reservation software catalogs the history of every rider in our system and all riders in aggregate. While each case for suspension is considered on its own
merits, the agency will not suspend passengers who are within system norms for the queried period of time.

A passenger who is suspended for No Show and/or Late Cancel activity has the same right of appeal as a passenger who is found ineligible to use Paratransit (see page 8).

LIMITATIONS

ANIMALS

We welcome your service animal, but cannot accommodate pets. A service animal is an animal trained to perform a task which accommodates conditions associated with a passenger’s disability. Comfort or companion animals are NOT considered service animals by the ADA.

REFUSAL OF SERVICE

Union County Public Transit shall not discriminate based on any protected status. However, refusal of service may result from illegal conduct or actions that pose a threat to the safety of the driver or other riders. A passenger may also be refused service for discharge of bodily fluids that are not (or cannot) be contained in an appropriate matter.

A passenger denied service has the same right of appeal as a passenger found ineligible for service (see page 8).

Prohibited Conduct

In addition to the previous provisions, passenger on the Paratransit may be subject to refusal of service for the following prohibited behaviors:

- Smoking or Spitting on the bus
- Fighting, pushing, shouting or engaging in disruptive behavior (not disability related)
- Taunting, bullying, or use of vulgar/offensive language with other passengers and/or staff (not caused by a disability such as Turrets)
- Throwing objects
- Engaging in illegal activities
- Carrying hazardous object, firearms, or weapons
- Playing musical instruments or devices (personal music devices are okay with the use of headphones)
- Transporting any materials that my harm others

MOBILITY DEVICES

We will not transport any mobility device that exceeds the capacity of our equipment. Wheelchairs must fit entirely within the width of our ramp/lifts (including helper ringer on wheels). We will likewise not attempt a boarding where the combined weight of a rider and
device exceeds equipment specifications. If you have a large mobility device please call for an evaluation before making a ride request.

**Securing Mobility Devices**

Our driver *(and only the driver)* is responsible for securing your mobility device into our vehicle. It is our policy to secure all devices for transport.

**Passenger Restraints**

UC Transit encourages all passengers to use shoulder restraints and lap belts.

**Other Prohibited Conduct**

In addition to the items listed in the foregoing, a passenger may not:

- Eat, drink, smoke or spit on the bus
- Fight, push, shout or act violently
- Use vulgar or offensive language
- Throw objects
- Engage in illegal activity
- Carry hazardous objects
- Carry flammable or poisonous items
- Transport material that may harm others, could spill or have an offensive odor
Appendix D: Area of Service and General Information

Trip Reservation Phone Number
(541) 963-BUSS Ext. 2

Hours of Service:
Monday through Friday 7:30 AM to 5:30 PM
Saturday 10 AM to 6:00 PM

Other Agency Services:
The Trolley - Fixed Route; La Grande
Monday through Friday 7:30 AM to 5:30 PM
Saturday 10 AM to 6:00 PM

Incidental Medicaid Rides:
Medical Transit Program 877-875-4657

Event Management:
Kate Sprauer (541) 963-2877 Ext. 6

Contact Information:
Union County Public Transit
2204 East Penn Avenue
www.neotransit.org

Angie Peters, Transit Manager: Ext. 158
Kate Sprauer, Assistant Manager: Ext. 6

Se habla Espanol:
Eddie or Lucy, (541) 963-2877 Ext. 105
Appendix E: Deviated Route Policy

Route Deviation Policy

2017
Purpose and Goals:
The purpose of this policy is to establish the governing principles for the operation of safe, convenient and cost effective Route Deviation service in La Grande, OR. This policy will comply with and be informed by:

- Title VI of the Civil Rights Act of 1964
- Union County Title VI Plan, October 2013
- Applicable regulations under the Americans with Disabilities Act of 1990
- 49-CFR-Part 27 - Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Assistance
- 49-CFR- Part 37 - Transportation Services for Individuals with Disabilities
- 49-CFR- Part 38 - Accessibility Specifications for Transportation Vehicles
- Union County ADA Paratransit Policy, 2017

Scope of Policy:
The immediate intent of this policy is to guide service delivery on Saturdays in La Grande, OR. However, it has been designed to be applicable to other days and/or jurisdictions. While additional modification would require public process and the formal action of agency governance, nothing in this document should be construed to limit its use to the current adaptation.

Buses and Equipment:
At all times the vehicles deployed for Deviated Route Service will meet or exceed the accessibility standards mandated by 49-CFR-Part 38. All operators will be trained to proficiency on the use of incorporated accessibility equipment.

Area of Service:
The area of service for Route Deviation shall be ¾ of a mile on either side of the fixed route line. To aid the timeliness of the scheduled route, deviations beyond ¼ of a mile will have a separate vehicle scheduled to deliver the trip. In determining origins and destinations eligible for deviation, staff shall incorporate a point-to-point (as opposed to as-the-crow-flies) reckoning using the global position module of the agency’s trip reservation software. Google Maps Open Maps and Mapquest are also acceptable for mobile or in-the-field findings of eligibility.

A map approximating the area of service is contained in Appendix A. However, as a radial (as-the-crow-flies) model it should be used for estimating purposes only.
How to Schedule a Deviation:

A passenger can request a deviation by calling our office at 541-963-BUSS a day in advance (by 3:00 pm). There is no limit to the number of deviations a passenger may request. The agency will not prioritize one type of deviation request over another. A trip to the dentist will be given equal priority as a trip to the candy store.

Cancellations and No-Shows:

A cancellation made an hour or more before the requested deviation is processed at no fault to the rider. A cancellation made less than an hour prior to the scheduled deviation is considered a Late Cancel. If the bus arrives at the agreed deviation point and the passenger is not there it will be recorded as a No Show.

A pattern of Late Cancels may result in suspension of a passenger's deviation request privileges.

The first No Show will result in a written warning from the Transit Assistant Manager. Further no show activity will result in suspension of a passenger's deviation request privileges for at least 30 days (but not longer than 90 days) at the Assistant Manager's sole discretion.

Passengers who have been suspended may appeal to the Transit Manager. In considering an appeal the Transit Manager may interview the rider, bus drivers, witnesses and review satellite and other digital records. The Manager will override or uphold the suspension based on his or her findings within 7 days of the filing of appeal. His or her decision is final.

Dwell Time:

Dwell time in this mode is effectively zero. The bus will wait no longer at a requested deviation point for a passenger to present as ready to ride than it would at a designated bus stop. In this regard, a passenger requesting a deviation should be ready at the agreed origin five minutes prior to the bus's arrival. If the passenger misses the scheduled connection it'll be recorded as a No Show and subsequent deviation requests for the day will be considered cancelled.

With these things in mind, a passenger waiting at a scheduled deviation has the same rights as a passenger at a formal bus stop. The bus and driver will spend whatever time is required to safely board the passenger and his or her mobility devices.

Handling Deviation Requests:

Route Deviation service is considered a Demand Response mode by the Americans with Disabilities Act. As such, it does not require the agency to provide Complementary Paratransit (sometimes called dial-a-ride). However, it is important to the agency that the bus runs on time. At its sole discretion, it may send a general public sedan, minivan (or even a taxi) to facilitate one or more deviation requests rather than taking the bus off route.
Flag Stops:

The Route Deviation model is NOT in conflict with the practice of flag stops. However, the route between scheduled bus stops may differ from the published schedule.

For example, a passenger wishing to flag the bus down on the corner of Sixth Street and I Avenue in Figure 1 would not be in the path of travel if another passenger requests a deviation down Fourth Street.

Whatever the path of travel, the Route Deviation system will honor flag stops at the nearest location where passengers can be safely boarded. The exception of Island Avenue from the Fixed Route system applies. However, for best results, passengers may be best served to wait at a designated stop.

Legacy Policy:
The Route Deviation Mode inherits its published route (Appendix B) and much of its functional policy from the Fixed Route system. Among these are:

- Passengers should be at the bus stop (or deviation point) five minutes prior to the scheduled departure time
- Bus fares are the same for designated, route, flex and deviation boardings
- Exact change is required (our drivers don't make change)
- Passengers are encouraged to cross the street AFTER the bus has pulled away to allow for full view of on-coming traffic in both directions
- Bicycle racks accommodate two bikes (first come, first served)
  - Bike owners load, unload and accept all risks thereof
  - Bicycles are not allowed inside the bus
- We accommodate service animals recognized by the Federal Transit Administration
  - Pets, companion or "comfort" animals do not qualify
- Carry-on items are limited to what the passenger can load and stow independently
  - No items may be left in the aisle
  - No items which cannot be safely stowed (in the driver's estimation)
  - No hazardous materials (e.g. fuel containers but other examples apply)
  - Public Transit is not responsible for lost or stolen belongings
• Priority seating is for the elderly and people with disabilities

• Cell phones are allowed on the bus but passengers are encouraged to be courteous of other passengers

• Personal music devices are allowed on the bus but ONLY with head phones

• Standees are permitted behind the white line only (no passenger may board a Union County Public Transit vehicle with rollerblades or roller skates)

• Bare feet are not allowed on the bus

• Union County Public Transit reserves the right to entry or to expel any passenger who (in the judgment of UCPT through its operators) interferes with the safe operation of the vehicle

Durability:
This policy is intended to be a living document. Having been adopted by agency governance it may be periodically opened for review, revision, public comment and formal modification.

If any provision of this policy is found to be out of compliance with a stronger governing policy, grant agreement, Federal Transit Administration circular or Oregon Administrative Rule, the rest of the policy will remain in full effect while the agency makes the necessary amendments.
Appendix A: Approximation of Area of Service
# Appendix F: ADA Complaint Log

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