Acknowledgments:

Union County Public Transit and its parent agency Community Connection of Northeast Oregon, Inc appreciate the efforts of numerous stakeholders and partners who have participated in the development of this update. Their creative input, energy and commitment to the future of local mobility options were essential components in the culmination of this policy. In addition, the following agencies and individuals made significant contributions toward this effort:

- Sherrin Coleman – Intermodal Civil Rights Manager – ODOT Office of Civil Rights
- Robin Phillips – Region V Coordinator, ODOT Public Transit
- Cheryl Jarvis-Smith, Transportation Growth Management Planner – ODOT Region V
- Ashley Wilhelm – Senior Department Specialist II, Union County Board of Commissioners
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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 policy.

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: Frank Thomas
Union County Transit Manager
541-963-2877 Phone
541-605-0705 Fax
frank@ccno.org
Definitions and References:

Every effort was made to keep this document simple. Sometimes demonstration of compliance with an applicable standard such as the Americans with Disabilities Act (ADA) requires us to use a specific term. Staff was mindful of unavoidable industry jargon as this policy was compiled. For your ease of reference, here are common definitions of 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 previous day.

**Dial-a-Ride:** Dial-a-Ride is a commonly used name for Paratransit service.

**Eligibility:** Eligibility is the process by which a passenger can apply to use Paratransit.

**Equivalence:** Equivalence generally refers to a provider’s obligation to run Paratransit services during the same schedule as the Fixed Route(s) it supports. It is also occasionally used to express a provider’s obligation to provide enough capacity (drivers and buses) 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.
Functional Assessment: A Function 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 delivery. A full discussion can be found on page 29.

Paratransit: Paratransit refers to a provider’s obligation under the ADA to offer an 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:

1) The trip request is presented in a manner consistent with the Day in Advance rule; AND
2) All the trip slots up to an hour before and up to an hour after the requested trip time are full; AND
3) 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 pickup time that is unknown when the appointment is made. The most common example is a doctor 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 he or she is ready for the return ride.

As an update, this policy incorporates the best parts of those that came before it. It is also frequently necessary to cite a specific requirement we are subject to. Again for your ease of reference, the following publications may be referenced in this policy:
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 9070.1G – Elderly Individuals and Individuals with Disabilities Program Guidance and Application Instructions (FTA 9070.1g)

Northeast Oregon Public Transit Paratransit Compliance Plan 2011 (Paratransit 2011)

Union County Public Transit Title VI Plan 2014 (Title VI 2014)
Executive Summary

Section 223 of the Americans with Disabilities Act (ADA) of 1990 requires operators of non commuter Fixed Route services to provide Complementary Paratransit services for individuals who are unable to use a Fixed Route system due to a disability. In addition, the regulations require the provider to develop and administer a process for determining eligibility for individuals who request Paratransit services.

Essentially, the ADA states that Paratransit must be “comparable” to the fixed route in terms of service levels and availability. There are six service criteria used to evaluate comparability to a Fixed Route. In no particular order they are:

- Available in the same Area of Service (see Definitions and References)
- Paratransit must be available during the same hours of service as the Fixed Route
- Fares for Paratransit may be no greater than double the Fixed Route fare
- There can be no trip restrictions or priorities given for any particular trip purpose
- There may be NO limitations on the number of trips or amount of service that an eligible rider may receive
- Paratransit must be available to any eligible rider, at any time during the regular operations schedule to anywhere in the service area, in response to a trip request made a day in advance

As a part of the ADA, all agencies providing Fixed Route services are required to have a plan showing how they were going to meet their defined obligations. As a larger agency, Community Connection of Northeast Oregon, Inc. adopted a formal plan in October 2010.

During Fiscal 2013 the agency received a Compliance Review from ODOT, administered by RLS Associates. For an agency (and county) that takes pride in delivering progressive, high quality services to people living with disabilities, the evaluation was humbling. Put bluntly, we had failed to appreciate the extent to which best practices in the Paratransit field can be a moving target. In order to remain compliant, we had some housekeeping to do.
Within 30 days of receiving the initial report from RLS, all of Union County Public Transit’s Paratransit publications were updated. While it is important to be in compliance, taking these actions brought us out of alignment with the adopted policy of the agency. At this point it is important to note that Community Connection of Northeast Oregon, Inc. is not an agency that is primarily engaged in Public Transit. With many things of urgency coming due in Fiscal Year 2014 that would require formal adoption, it made sense to move in a more efficient direction.

Contemporaneous to our local Paratransit adjustments, we began working on the Union County Title VI Plan. Adopted in October 2013, the Title VI Plan created a representative Advisory Council to receive the delegation from the Board of Directors to act on Public Transit business in Union County that does not rise to the level of a Major Service Change (see Section 5 – Public Participation). Formally seated in the first quarter of 2014, the Union County Public Transit Advisory Council hit the ground running with service changes, a Fare Study, the Annual Operations Plan, the Asset Management Plan, the Safety Management Systems Plan and the Fiscal Year 2015 budget all in their first six months.

Overdue as it may appear, this revision was prepared for adoption by the UC Public Transit Advisory Council in June 2014 for implementation in Fiscal Year 2015.

The last formal Paratransit Plan (Paratransit 2011) encompassed the entire Northeast Oregon Public Transit (NEOPT) system serving Baker, Union and Wallowa Counties. Near the end of Fiscal Year 2012, the agency elected to go an unprecedented direction by establishing a dedicated transit management team in Union County.

As you may expect, differentiation in the way mobility services are delivered between the counties has grown as a result. This trend is expected to accelerate as a function of time. In the Wallowa County delivery model, Paratransit isn’t necessary. In the estimation of lead staff in Union County, Paratransit as our agency presently chooses to deliver it is probably unsustainable in Baker County. While Union County Public Transit remains a proud member of the NEOPT network, this level of coordination no longer makes sense.
This update exclusively addresses Paratransit in Union County – specifically, in La Grande and Island City where the jurisdiction’s only Fixed Route service operates. Public Comment meetings and outreach efforts have been addressed accordingly (see Section 6 – Implementation Plan).

In order to prevent this important compliance process from returning to atrophy in the future, it has been entered into our triennial update rotation. Unless a compelling development requires us to reopen this policy for amendment, it will receive its next rewrite in Fiscal Year 2018.

Respectfully,

Frank Thomas, County Transit Manager
and the Union County Public Transit Team
Section 1.0  Population, Characteristics, Providers and Coordination

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 Population</td>
<td>25,748</td>
<td></td>
<td>13,980</td>
<td>3,831,074</td>
<td></td>
</tr>
<tr>
<td>Older Adults (aged 65+)</td>
<td>3,615</td>
<td>14%</td>
<td>1,957</td>
<td>438,177</td>
<td>11%</td>
</tr>
<tr>
<td>Persons with Disability</td>
<td>4,557</td>
<td>18%</td>
<td>2,516</td>
<td>593,301</td>
<td>15%</td>
</tr>
</tbody>
</table>

Source: Population Research Center at Portland State University, 2010

The table above was compiled from Union County statistics. The results for the La Grande and Island City service area were resolved assuming a uniform distribution of County percentages into a known population pool. It is intended to project the overall need for service by all providers (as opposed to just public services and of those, just ADA Paratransit).

All of Union County Public Transit’s fixed route services occur within the communities of La Grande and Island City, Oregon (the largest population center in Union County). Population in the adjoined communities has been stable over the last several census counts.

Review of Jurisdiction

A review of the services offered in (and connected to) Union County was performed. Union County is at a unique regional crossroads. The shaded counties in Image 1-1 all feature public transit services offered by Community Connection under various names. These services and a tribal connection from Umatilla County all meet at the Transit Hub in La Grande. Grant County (to the southwest) was included in the model because Community Connection offers a number of core services there, but Public Transit is not one of them.
Due to service design and its constituent population, Union County is obligated to provide a full Title VI Plan including Fixed Route Standards and Limited English Proficiency. Wallowa County (northeast) is not required to do Fixed Route Standards, LEP or a Paratransit Plan. Umatilla County is required to provide LEP but not Fixed Route Standards or Paratransit. For the time being, Baker County is required to provide a Paratransit Policy and Fixed Route Standards but LEP may be a matter of local interpretation. So far, it is only in Union County that all the pieces come together making it the de facto (if reluctant) regional leader.

The following services are operating within Union County. The only service provider with ADA Paratransit responsibilities in Union County Public Transit.

**ARC Cab Company**

<table>
<thead>
<tr>
<th>Type of Service</th>
<th>Mode</th>
<th>Community Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public</td>
<td>Demand Response</td>
<td>Union County, some out of county</td>
</tr>
<tr>
<td>Cab Fare</td>
<td>Dispatch Model</td>
<td>Schedule</td>
</tr>
<tr>
<td>Variable</td>
<td>Via cell phone</td>
<td>24 / 7 /365</td>
</tr>
</tbody>
</table>

ARC makes around 12,000 general public deliveries annually. This number shows a continued decrease since ridership peaked in 2008 at 16,172. They provide demand response access to most of the region. Everyday needs fulfilled by the cab include shopping, medical appointments and employment commutes. Cab fares vary by destination:

<table>
<thead>
<tr>
<th>Origin to Destination</th>
<th>General</th>
<th>Elderly</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inside La Grande / Island City</td>
<td>$8</td>
<td>$5</td>
</tr>
<tr>
<td>La Grande to Cove or Union</td>
<td>$23</td>
<td>$23</td>
</tr>
<tr>
<td>La Grande to Elgin</td>
<td>$25</td>
<td>$25</td>
</tr>
<tr>
<td>La Grande to North Powder</td>
<td>$36</td>
<td>$36</td>
</tr>
<tr>
<td>La Grande to Baker City</td>
<td>$75</td>
<td>$75</td>
</tr>
<tr>
<td>La Grande to Pendleton</td>
<td>$90</td>
<td>$90</td>
</tr>
</tbody>
</table>

ARC owns and operates two sedans with four passengers of capacity each. They do NOT feature ADA accessibility. They have no public office or facilities but coordinate for intermodal access with Union County Transit at the Regional Transit Hub.
**Baker Bow**

<table>
<thead>
<tr>
<th>The Baker Bow</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Type of Service</td>
<td>Mode</td>
<td>Community Served</td>
</tr>
<tr>
<td>Public</td>
<td>InterCity</td>
<td>Baker City, La Grande and cities between</td>
</tr>
<tr>
<td>Bus Fare</td>
<td>Dispatch Model</td>
<td></td>
</tr>
<tr>
<td>Variable</td>
<td>Mobile Computer</td>
<td>7 am to 6:15 pm Monday thru Friday</td>
</tr>
</tbody>
</table>

The Baker Bow is an InterCity route serving Baker City, La Grande and the communities of Haines and North Powder in route. In Fiscal Year 2013 the service delivered its busiest year at 2,725 total rides. Everyday needs fulfilled by the Baker Bow include Employment, Education and continued mobility (Greyhound) access. Bus fares vary with the origin, destination and whether or not the passenger intends to ride one way or round trip.

<table>
<thead>
<tr>
<th>Baker Bow Bus Fares</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Origin to Destination</td>
<td>One Way</td>
<td>Round Trip</td>
</tr>
<tr>
<td>Baker City to Haines</td>
<td>$2</td>
<td>$3</td>
</tr>
<tr>
<td>Baker City to North Powder</td>
<td>$4</td>
<td>$6</td>
</tr>
<tr>
<td>Baker City to La Grande</td>
<td>$5</td>
<td>$8</td>
</tr>
<tr>
<td>Haines to North Powder</td>
<td>$2</td>
<td>$3</td>
</tr>
<tr>
<td>Haines to La Grande</td>
<td>$5</td>
<td>$7</td>
</tr>
<tr>
<td>North Powder to La Grande</td>
<td>$4</td>
<td>$6</td>
</tr>
</tbody>
</table>

Operated by Community Connection of Northeast Oregon’s Baker City office, the Bow can be offered in any number of minivan or cutaway vehicle classes on any given day. The Bow always features ADA accessibility and is a full coordinating member in the Northeast Oregon Public Transit network.

**Center for Human Development**

<table>
<thead>
<tr>
<th>Center for Human Development</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Type of Service</td>
<td>Mode</td>
<td>Community Served</td>
</tr>
<tr>
<td>Client-Only</td>
<td>Demand Response</td>
<td>Mostly Union County</td>
</tr>
<tr>
<td>Bus Fare</td>
<td>Dispatch Model</td>
<td>Schedule</td>
</tr>
<tr>
<td>None</td>
<td>Appointment</td>
<td>Appointment Driven Demand Response</td>
</tr>
</tbody>
</table>
Center for Human Development provides rides exclusively for clients of their mental health, alcohol and drug recovery and developmental disability programs. They operate a fleet of 14 vehicles (64% of which are two or four door passenger sedans). Three of CHD’s vehicles feature ADA accessibility. CHD does not materially coordinate with the larger transit network but has expressed a strong interest in partnership opportunities.

**Confederated Tribes of the Umatilla Indian Reservation – La Grande Arrow**

<table>
<thead>
<tr>
<th>Type of Service</th>
<th>Mode</th>
<th>Community Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Public</td>
<td>InterCity</td>
<td>Union and Umatilla</td>
</tr>
<tr>
<td>Bus Fare</td>
<td>Dispatch Model</td>
<td>Schedule</td>
</tr>
<tr>
<td>None</td>
<td>InterCity</td>
<td>3 arrivals daily: 6:28am, 10:48am, 6:05 pm, M-F</td>
</tr>
</tbody>
</table>

The La Grande Arrow is an intercity transit line running between Mission and La Grande, Oregon. Most recent available data indicates that the service provided over 7,000 rides in 2010. The Arrow is predominantly a job access service for employees of the Confederated Tribes of the Umatilla Indian Reservation who reside in Union County. It typically arrives in 14 to 20 passenger cutaway vehicles featuring ADA accessibility. The Arrow is coordinated to the Union County system through a shared terminal at the Regional Transit Hub in La Grande.

Bus fare on the La Grande Arrow is free.

**New Day Enterprises**

<table>
<thead>
<tr>
<th>Type of Service</th>
<th>Mode</th>
<th>Community Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>Client-Only</td>
<td>Demand Response</td>
<td>Primarily La Grande</td>
</tr>
<tr>
<td>Bus Fare</td>
<td>Dispatch Model</td>
<td>Schedule</td>
</tr>
<tr>
<td>None</td>
<td>Assignment / Contract</td>
<td>Demand Response</td>
</tr>
</tbody>
</table>
New Day Enterprises provides comprehensive mobility services exclusively for residents of their group homes and sheltered workshops for adults living with Developmental Disabilities. They provide an estimated 52,500 one way trips annually. Their fleet consists of 29 vehicles (7 of which feature ADA accessibility).

New Day has a statutory obligation to keep vehicles in reserve 24/7 for their group homes. As a result, meaningful coordination is very difficult. However, agency leadership is supportive and has expressed an interest in working with Public Transit where it makes sense.

**The Wallowa Link**

<table>
<thead>
<tr>
<th>The Wallowa Link</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Type of Service</strong></td>
</tr>
<tr>
<td>---------------------</td>
</tr>
<tr>
<td>Public</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Bus Fare</td>
</tr>
<tr>
<td>$5.00</td>
</tr>
</tbody>
</table>

The Wallowa Link runs between Joseph and La Grande serving the communities of Enterprise, Lostine, Wallowa, Elgin, Imbler and Island City in route. The schedule is carefully synchronized to arrivals and departures of Greyhound Lines in La Grande. The system produced 1,085 deliveries in Fiscal Year 2013. Operated by Community Connection’s office in Wallowa County, it is typically served in a 14 passenger cutaway featuring ADA access. The Wallowa Link is a fully coordinating member of the Northeast Oregon Public Transit network.

**Union County Public Transit**

Union County operates Fixed Route, Demand Response, InterCity, Contract/Charter and the Paratransit services that are the subject of this study.
Fixed Route:

The Trolley Fixed Route runs from its hub at the Walton Road Business Complex through Eastern Oregon University.

<table>
<thead>
<tr>
<th>Days of Service</th>
<th>Begins At</th>
<th>Ends At</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monday Through Friday</td>
<td>7:30 AM</td>
<td>5:30 PM</td>
</tr>
<tr>
<td>Saturday</td>
<td>10:00 AM</td>
<td>6:00 PM</td>
</tr>
</tbody>
</table>

Bus fare is $1 per boarding. The following passes are also available:
<table>
<thead>
<tr>
<th>Scrip Type</th>
<th>Price</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unlimited Day Pass</td>
<td>$4</td>
</tr>
<tr>
<td>20 Ride Punch Pass*</td>
<td>$20</td>
</tr>
<tr>
<td>Unlimited Monthly Pass</td>
<td>$40</td>
</tr>
</tbody>
</table>

* The 20 Ride Punch Pass is a left over option from Fare Study 2014 and is likely to be amended (or discontinued) in Fiscal Year 2015

Pursuant to the adopted Title VI Plan, the Trolley 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 23 minutes per leg (thereby establishing the on-board equivalence in the ADA Paratransit system) resulting in 7 minutes of recovery at each terminus (14 minutes each hour).

**On Time Performance:**

UC Public Transit considers a Fixed Route bus late if it departs a scheduled 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 hub. Union County Public Transit has established an on time arrival performance standard of no less than 85% of all scheduled stops.

**Service Availability:**

It is Union County Public Transit’s goal to ensure that 60% 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 services in Union County and calculating the population (based on 2010 Census data) within a ¾ of a mile radius of those lines. The result is compared to the total population of Union County.

**Vehicle Assignment:**

Union County Public Transit’s strategy for vehicle assignment is based on capacity and modal function. Buses are therefore deployed without systemic bias impacting the protected characteristics of any particular community (age, ethnicity, socioeconomics, etc.).
All of UC Public Transit’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 within the system.

**Transit Amenities:**

Transit amenities are distributed throughout the fixed route service area. Placement criteria for future improvements includes:

- **Bus Shelters**
  - Stops with monthly boarding demand over 200 riders
  - No less than 80% of UC Public Transit shelters shall be located in Census Tracts featuring a population density of at least 1,000 people per square mile

- **Bus Stop Benches**
  - Stops with monthly boarding demand over 100 riders
  - No less than 50% of UC Public Transit bus stop benches shall be located in Census Tracts featuring a population density of at least 1,000 people per square mile

- **Trash Receptacles**
  - Stops with monthly boarding demand over 100 riders
  - Receptacle citing will be subject to UC Public Transit’s ability to service (or obtain contract servicing) for regular collections

<table>
<thead>
<tr>
<th>Local #</th>
<th>Vehicle Type</th>
<th>Typical Assignment</th>
</tr>
</thead>
<tbody>
<tr>
<td>2023</td>
<td>Sedan</td>
<td>ADA Paratransit, Demand Response</td>
</tr>
<tr>
<td>2020, 2025, 2026</td>
<td>Minivans</td>
<td>ADA Paratransit, Demand Response</td>
</tr>
<tr>
<td>2021</td>
<td>Straight Vans</td>
<td>ADA Paratransit, Demand Response</td>
</tr>
<tr>
<td>2010</td>
<td>Cutaway Vans</td>
<td>ADA Paratransit, Demand Response, InterCity</td>
</tr>
<tr>
<td>2013, 2022</td>
<td>Cutaway Vans</td>
<td>Fixed Route, Demand Response, InterCity</td>
</tr>
<tr>
<td>2019</td>
<td>Heavy Duty Transit (Trolley)</td>
<td>Fixed Route</td>
</tr>
</tbody>
</table>
Demand Response

Demand Response is the most common way that routes are accounted for when no other mode is appropriate. For example, a contract Medicaid trip from Summerville, OR (where no formal transit services exist) to La Grande would be classified as a Demand Response trip since:

- It is provided on an origin to destination basis
- There is no Intercity, Commuter of Fixed Route service in the community
- It may be provided to a rider who is contract (not Paratransit) eligible
  - Even if he or she is Paratransit eligible, part of the incidental contract trip is far outside the area of service

As a practical catch-all (and as the name implies) Demand Response does not feature a formal schedule.

Intercity Services

Union County Public Transit provides access to and from Elgin, OR and Union, OR on Wednesdays and Thursdays, respectively.

**Elgin Stage:**

Funded by Section 5311(f), the Elgin Stage is designed to make a scheduled connection with Greyhound in La Grande (serving the community of Imbler in route). With day in advance notice, the service features courtesy curb side pickup in Elgin and delivery to the first destination in La Grande. Once in La Grande, the passenger is handed off to the local Fixed Route and (if eligible) ADA Paratransit system.

Bus fare for the service is $3.50 per boarding.
The Union Bobcat is funded exclusively through bus fares and discretionary surplus resourced by the Union County Public Transit management team. It is designed to connect with Greyhound in La Grande to make it more appealing for the future consideration under Section 5311(f). It is considered a lifeline service to the community that would otherwise be completely without Public Transit services.
Bus fare for the Union Bobcat is $3.50 per boarding. Similar to the Elgin service, it features courtesy curb side pickup in Union and first destination delivery in La Grande with a day in advance reservation.

<table>
<thead>
<tr>
<th>THURSDAY MORNINGS</th>
<th>THURSDAY AFTERNOONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stop</td>
<td>Arrival</td>
</tr>
<tr>
<td>LG Transit Hub</td>
<td>9:00</td>
</tr>
<tr>
<td>Union Hotel</td>
<td>9:20</td>
</tr>
<tr>
<td>Union Clinic</td>
<td>9:25</td>
</tr>
<tr>
<td>LG Transit Hub</td>
<td>10:00</td>
</tr>
</tbody>
</table>

Arrival and Departure times are estimates that may not completely account for curbside or in route demand. The BobCat may occasionally run late, it will NEVER run early.
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 the 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 FTA from recipients of federal funding are submitted monthly.
Section 2.0  Delivery of Paratransit in La Grande and Island City

Union County Public Transit provides ADA compliant Paratransit services for eligible individuals in the La Grande and Island City area of service where it also provides Fixed Route. This section outlines the operating parameters of the service.

2.01 Schedule

ADA Paratransit operates from 7:30 am to 5:30 pm, Monday through Friday and from 10:00 am to 6:00 pm on Saturdays.

2.05 Area of Service

Image 2.05 demonstrates a zone ¾ of a mile on either side of the Trolley Fixed Route service line where Paratransit support is required by the ADA.

2.2 Eligibility

The ADA requires providers to preserve Paratransit services EXCLUSIVELY for the use of individuals who are prevented from using a Fixed Route. This is an important distinction. Paratransit is not for people who would prefer origin to destination service or are simply inconvenienced by using a Fixed Route.

There is no age at which a rider becomes Paratransit eligible. Likewise, a diagnosis of any particular disability is insufficient (by itself) to determine eligibility.
Paratransit eligibility is based on an applicant’s level of ability. Someone who uses a walker may be perfectly capable of using a Fixed Route. Another passenger who appears healthy may have a hidden disability (such as narcolepsy) that would qualify him or her to ride the Paratransit system.

To complicate the eligibility equation further, factors staff may not consider include (but are 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 a process to become eligible for ADA Paratransit services. The application is available on-line (in both English and Spanish) or can be sent by request. Alternative or accessible formats and staff assistance is available upon request. UC Public Transit staff has 21 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**

A finding of Presumptive Eligibility can (and usually does) happen before a prospective rider makes application. Upon initial contact, staff can often make an accurate educated guess about the presence of a condition that prevents Fixed Route use.

Presumptive Eligibility (sometimes mistakenly called Temporary Eligibility) provides full ADA Paratransit services to an applicant for up to 21 days while an application is processed. Typically, Presumptive Eligibility is quickly replaced by a more formal finding.
**Temporary Eligibility**

Temporary Eligibility means that an applicant has presented with a condition that prevents him or her from using a Fixed Route that is expected to improve in the near future. For example, a patient having knee replacement surgery is likely to be Paratransit eligible for a short period of time following his or her operation. A year later, he or she may be able to use a Fixed Route and no longer qualified to ride Paratransit.

**Conditional Eligibility**

Conditional Eligibility occurs when a passenger presents with an inability to use a Fixed Route for some trips (or some types of trips). For example, a knee replacement patient may find that he or she is able to use a Fixed Route during summer months but is prevented during the winter. In such a case, the passenger may be found Conditionally Eligible – with eligibility perhaps being awarded October through April.

**Unconditional Eligibility**

Sometimes called Full Eligibility, Unconditionally Eligible means a finding has been entered that a rider is prevented from using a Fixed Route by a condition that is unlikely to improve. Unconditional Eligibility is reevaluate every three years with the bias that a passenger will continue to be Paratransit eligible.

**Ineligible**

A condition that prevents the applicant from using a Fixed Route was not presented. An applicant who is found Ineligible may file an appeal within 60 days.

In the event that staff is unable to make a clear determination of eligibility from the application, a referral is made to Mountain Valley Physical Therapy for a Functional Assessment by an Occupational Therapist. All costs of a Functional Assessment and the transportation to and from the appointment are covered by Union County Public Transit.
Union County Public Transit honors findings of Paratransit Eligibility that have been made in other jurisdictions on the same basis as Presumptive Eligibility. For example, a rider visiting La Grande from Eugene will enjoy up to 21 days of the same riding privileges on the local system as he or she has been found eligible for at home. After 21 days he or she will need to make formal application on the Union County system to continue his or her eligibility status.

2.3 Bus Fare

Base bus fares for Union County Public Transit’s Paratransit system are always 2x the base rate for the Fixed Route or less.

2.4 Scheduling and On Time Performance

Union County Public Transit requires Day in Advance scheduling to secure a ride guaranteed by the ADA. Day in Advance means between 10:00 am and 3:00 pm the day prior to the reservation to ride. On Sunday, UC Public Transit will accept any voicemail request left before 3:00 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 are NOT subject to a guaranteed ride under the Americans with Disabilities Act.

UC Public Transit is able to accommodate ride requests up to 14 days in advance. Recurring trips that happen at least weekly and at predictable times may be scheduled on a subscription (standing order) basis for up to 30 days with renewals available upon request.

Promise Window

At the time a ride reservation is made, the passenger is provided with a commitment for UC Public Transit to arrive within a 20 minute promise window. For example, a rider who accepts a 10:30 am pickup will receive a promise window from 10:30 am to 10:50 am.
**Courtesy Window ("Dwell Time")**

Union County Public Transit will wait two minutes after arriving to pick up a passenger for him or her to present to ride. If the Courtesy Window closes without a passenger presenting to ride, the trip is booked as a No-Show and the driver moves on to his or her 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. Once on board, On Time Performance is considered to be getting a Paratransit passenger off the bus within 23 minutes. This represents the maximum runtime of a fixed route from origin to terminus, in light traffic.

It is Union Count Public Transit’s goal to deliver 95% on time performance for boarding and 99% for disembarkments.

**2.5 Trip Purpose, Priority and Volume**

Union County Public Transit does not restrict or prioritize trips. A ride to the candy store is no more or less important than a ride to the dentist. An eligible passenger may ride anywhere in the service area during the system schedule. There is no limit to the number of trips a rider may request as long as they are made a day in advance.
2.6 Origin to Destination and Trip Denials

Origin to Destination

The ADA was intentionally crafted with the vague term “Origin to Destination” describing a passenger trip to avoid the passively limiting terms sometimes 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 detailed operational decision the ADA leaves to local operators and riders. The ADA recognizes that arranging for assistance beyond the curb takes addition time and that it is reasonable to for the provider 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.

Union County Public Transit makes its best effort to fulfill Door-to-Door requests that don’t constitute a fundamental alteration of its service. The operational tradeoff is it asks riders to observe its strong preference for such requests to be made at least a day in advance (preferably at the time the original ride reservation is scheduled).
**Trip Denials**

Union County Public Transit is obligated under the ADA to accommodate every Paratransit ride request, made by an eligible passenger, within the schedule and area of service, when it is made a day in advance. The ADA requires the ride to be provided at the requested time if it is available. If not, UC Public Transit must offer the surrounding open time spots. If an adjacent time slot is not open within one hour on either side of a requested reservation, the provider is required to add capacity (driver and vehicle) to accommodate it. This obligation constitutes the ADA ride guarantee. Failure to do so is considered a trip denial.

Note... If a surrounding time is available but doesn’t work for the rider (that is, he or she declines an available appointment) it is not considered a trip denial. However, 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 Americans with Disabilities Act. Union County Public Transit takes every possible step to avoid trip denials.

**2.7 Personal Care Attendants, Service Animals, Guest Riders and Carry On Items**

*Personal Care Attendants (PCAs)*

Union County Public Transit transports PCAs for free with the passenger’s paid fare. UC Public Transit 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.

Union County Public Transit cannot perform the duties of a PCA nor will it provide or recommend one.
Disability Service Animals

Union County Public Transit 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 Americans with Disabilities Act present 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.

Union County Public Transit 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 pet 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

Union County Public Transit will transport a traveling companion who is not Paratransit eligible with an eligible rider on a fee for service basis. UC Public Transit will transport more than one companion on a space available and fee for service basis.
Carry On Items

Generally, carry on items are limited to what the passenger can independently carry on to the bus and store at his or her 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.

UC Public Transit’s drivers may assist with carry on items within the following limitations:

1) Assistance is limited to getting the items on and off the bus.
2) UC Public Transit will not load or transport carry on items that cannot (in the driver’s estimation) be safely stowed for the ride.
3) UC Public Transit 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).
4) UC Public Transit will not assist with any item that (in the driver’s estimation) exceeds 25 pounds in weight.

2.8 Mobility Devices, Securement and Restraints

Personal Mobility Devices

To be eligible for transport, wheelchairs and scooters must not pose legitimate safety risks 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 and lifts (including helper ringer on wheels). They will likewise not attempt to board a passenger and mobility device that combine to exceed the weight capacity of its lifts or ramps.

Passengers with large, heavy or asymmetric equipment are encouraged to call a day in advance for a staff assessment.
Securements and Restraints

UC Public Transit’s driver is exclusively responsible for securing mobility devices into agency vehicles. It is their policy that all mobility devices be secured for transport. However, the Americans with Disabilities Act recognizes the mobility device as an extension of the occupant’s personhood. He or she has the right to refuse securement.

It is the policy of Union County Public transit for all passengers to use safety belts and shoulder restraints in the vehicles where they are available. The Americans with Disabilities Act recognizes a passenger’s right to refuse these restraints.

Securement and Restraint are the default expectations for all of Union County Public Transit’s drivers (irrespective of the number of previous times such safety considerations have been declined by the passenger).

2.9 Cancellations, No-Show, Refusal of Service

Cancels, Late Cancels and No Shows

A cancelation is any trip canceled at least an hour before the scheduled pickup. Cancellations can be made by calling the Regional Transit Hub and even by leaving a voicemail.

A Late Cancel occurs when a cancellation is made with less than an hour until the scheduled pickup.

A No-Show is when the driver arrives to pick up a passenger who does not present during the Courtesy Window or in another manner declines the ride.

A pattern of No-Show or Late Cancel on subscribed trips may result in the automatic cancellation of pending and future subscriptions. A passenger subject to such a suspension is notified in writing. He or she has the same right of appeal as a passenger who has been found ineligible for Paratransit.
A passenger accruing three or more No Shows, or a pattern of Late Cancels in excess of system norms (or both) during a given month may receive a written suspension warning. However, UC Public Transit approaches suspensions VERY reluctantly.

The passenger in the sample report (Image 2.9) is clearly beyond system norms. However, if the same number of No Shows and Late Cancels were noted by a rider that consumed 200 trips during the month, they’d be roughly within operational tolerances. Incidentally, this report was used to counsel the passenger resulting in a subscription adjustment that resolved the problem—which is probably the best possible outcome of a potentially punitive report.

Each case for suspension is considered on its own merits and within demonstrable system context. **In no case shall a suspension be disproportional to the pattern of disruption for which it is attempting to inspire correction.**

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.
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 based on the discharge of mobility equipment that cannot be safely loaded or transported and/or 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 otherwise ineligible for service.

Other Prohibited Conduct

In addition to the foregoing provisions, passengers on the Paratransit system generally may not:

- Smoke or spit on the bus
- Fight, push, shout or engage in disruptive behavior (not disability related)
- Taunt, bully, or use vulgar/offensive language with other passengers and/or staff
- Throw objects
- Engage in illegal activities
- Carry hazardous objects, firearms or weapons
- Play musical instruments or devices
  - Personal music devices are okay with the use of headphones
- Transport any material that may harm others, could spill or has an offensive odor
Section 3.0  A Comparison of Current Paratransit and the ADA

This section provides a direct comparison of Union County Public Transit’s Paratransit service with individual requirements of the Americans with Disabilities Act. When applicable, the Fixed Route operating practice is described and then the compliant Complementary Paratransit support system. If the service does not meet the ADA regulatory requirement, the necessary steps to achieve compliance will be recommended.

Service Area:

ADA Paratransit services must be provided (at minimum) in all areas that are within ¾ of a mile of a Fixed Route transit line. This also includes the terminus or surrounding area at the end of route. The entire ADA service is equal to a 1½ mile corridor centered on each fixed route line in the jurisdiction.

Request for rides where both the origin and destination are within the Paratransit service corridor, must be provided for. A Paratransit eligible rider NEED NOT live within the service corridor as a condition of eligibility – but would be eligible during time he or she spends within the area of service.

**FINDING:**  

EXCEEDS ADA

The Area of Service for the Paratransit System (see Image 2.05) incorporates all required service corridors and – as a matter of practicality – serves eligible populations generally considered to reside in the cities of La Grande and Island City.

Days and Hours of Service:

ADA Paratransit service must be provided during the same days and same hours as the Fixed Route Bus services it supports.
**FINDING:**

The Trolley Fixed Route runs from 7:30 am to 5:30 pm Monday through Friday and from 10:00 am to 6:00 pm on Saturday. Since Union County Public Transit also offers Subscription Service (see Section 2.4 – Scheduling and On Time Performance) it carries the additional burden of assuring that no more than 50% of its ADA Capacity is committed at any given time.

UC Public Transit’s Paratransit service runs during the same days and hours as the Trolley Fixed Route. It features as many as three active Paratransit drivers and one in report reserve during peak demand hours.

**Bus Fares:**

The fare charged for ADA Paratransit service can be no more than twice the amount charged for the base fare of the Fixed Route system it supports. Base fare is the amount charged for a full fare paying passenger on the local Trolley Fixed Route system.

Personal Care Attendants can travel with eligible riders for free but must have the same origin and destination as the passenger they accompany. Companions can travel with an eligible client for the regular fare. Companions must also have the same origin/destination as the eligible passenger.

**FINDING:**

Union County Public Transit charges $2 for a one way trip on Paratransit. The Fixed Route fare is $1. There is no charge for PCAs. The system allows PCAs to be indentified on-the-fly (a PCA does not have to register in advance). A companion can ride along for an additional fare. Multiple companions can ride along on a fee for service and space available basis.
Trip Purpose:

Since a Fixed Route can be used for any trip purpose, equivalence of service dictates that the same must be true for Paratransit. Likewise, trips cannot be prioritized (a trip to the liquor store is no more or less important than a trip to the cardiologist). Finally, the Paratransit system may not impose limitations on the number of rides an eligible passenger can schedule.

**FINDING:** **COMPLIES WITH ADA**

Union County Public Transit does not prioritize or in any way limit the use of Paratransit service by eligible riders when trips are booked within the area of service, the service schedule and reserved a day in advance.

Trip Availability:

The ADA requires that next day service be provided. Trips that are scheduled for the next day have to be scheduled the day before. Rides need to be available for scheduling during the entire day of service (as dictated by the published Fixed Route schedule).

Actual pickup times can be negotiated up to one hour before or one hour after the time requested by the passenger. Passengers need to be available to ride 10 minutes before (and up to 10 minutes after) the scheduled pickup time – thus framing the 20 minute Promise Window.

Pickup times for return rides are no more than 30 minutes from the scheduled time. For will call trips (or non scheduled pickups) return rides are within 60 minutes of the passenger phoning the request into dispatch.

**FINDING:** **EXCEEDS THE ADA**

Union County Public Transit meets all of the described ADA Performance standards. On a space available basis, UC Public Transit will also consider trip requests that are not made a day in advance (these trips are just not subject to the ADA guarantee of service).
**Capacity Constraints:**

ADA Paratransit service must not be operated with capacity constraints. That means there can be no limitation to the number of total trips or trips per person made available per day. There must also not be a pattern or practice of Trip Denials, missed trips, late pickups or trip length that is not comparable to a Fixed Route. Finally, there can be no operational practice that has the effect of limiting service to any eligible client.

**FINDING: EXCEEDS THE ADA**

In addition to meeting all of the above mentioned provisions of the ADA, Union County Public Transit measures Title VI Performance Standards from the Fixed Route in order to evolve and inform Paratransit procedures.

Union County Public Transit measures and forecasts Paratransit demand quarterly using a custom designed report its reservation software. It then resets Paratransit schedules to ensure sufficient capacity and to actively prevent Trip Denials.

The agency’s on time performance goals for Paratransit are MUCH higher than its Fixed Route objectives.
Section 4.0  Paratransit Eligibility

As Per the Americans with Disabilities Act

The ADA requires Paratransit services to establish a process for determining eligibility. Per the ADA, documentation of eligibility, if applicable, must be provided to persons deemed to be eligible. Also, an appeals process must be made available for persons who are determined to be ineligible or only eligible under certain conditions. A separation of authority must be maintained between the individual making the initial determination and the individual(s) deciding the appeal.

All individuals determined to be ADA Paratransit eligible have a **CIVIL RIGHT** to obtain the levels of service and associated provisions of the ADA Paratransit services described in this policy. Eligibility as defined by the ADA is as follows:

- Persons who have a specific impairment-related condition that prevents them from getting to or from a Fixed Route bus stop
- Person who cannot use the Fixed Route service because the route(s) needed for a particular trip is/are inaccessible
- Persons who because of disability are unable to independently board, ride or disembark from an accessible Fixed Route vehicle

Disabilities can be permanent or temporary and must be considered accordingly.

Personal Care Attendants of Paratransit riders must be served as part of the eligible individual’s ride. One companion in addition to the PCA must be accommodated. Additional companions may be accommodated on a space available basis.

Per the ADA, paratransit eligibility is functionally based and NOT determined by the type of disability, mobility aid used or any particular diagnosis. Eligibility can be decided on a trip by trip basis, which is determined by specific conditions in conjunction with the disability. Examples include (but are not limited to) weather, passenger amenities available, specific medical treatments, etc. Due to this, eligibility can be determined to be unconditionally eligible, conditionally eligible, temporarily eligible, ineligible or eligible by presumption (see Section 2.2).
Visitors to the area who have been found Paratransit eligible by another jurisdiction must be provided 21 days of service (in any 365 day period) when they have documentation of eligibility. If a person is traveling from an area that doesn’t have Paratransit services, documentation of their disability can be requested. If more than 21 days of service is needed, visitors can be required to complete a formal local eligibility process.

Transit providers are able to establish a process for suspending service to individuals who are unduly disrupting operations with frequent no-shows. That process needs to exclude rides that are missed because of issues outside of the person’s reasonable control. Finally, the service suspension must be comparable to the level of disruption and it must be able to be appealed.

**Union County Public Transit Eligibility Practice**

In contrast to many providers of rural Fixed Route services in Oregon, Union County Public Transit follows a strict interpretation of the Americans with Disabilities Act for eligibility purposes. For reasons that make sense given the *Review of Jurisdiction* subsection and the fiscal limitations of the system, they intentionally avoid trying to be all things to all riders.

In La Grande and Island City the local public transit options are Fixed Route and Paratransit. You will not find (for example) an anemic attempt at a “senior bus” built on top of an essential Paratransit framework. The application process for Paratransit was developed with heavy influences from Lane County Transit District, Corvallis Transit System and CherryLift in Salem.

*Application Process:*

An application for Paratransit is available at the Public Transit office in La Grande and online at [www.neotransit.org](http://www.neotransit.org) (see Appendix B). Applications are published in English, Spanish, large print and alternative accessible formats. Staff is available to assist applicants in completing an application.
Once a **complete** application has been received, UC Public Transit has 21 days to make a determination of eligibility. Illegible or incomplete applications are returned to the applicant for correction (or as is more often the case, staff schedules time to assist the applicant in filing a complete application). If an applicant does not receive a letter within 21 days, he or she automatically receives Presumptive Eligibility until a more formal finding is entered.

**Presumptive Eligibility:**

*All* call takers and ride schedulers in the Union County Public Transit system are empowered to enter a finding of Presumptive Eligibility. Upon receipt of a request for service, staff is encouraged to find reasons why an applicant’s disability may prevent him or her from using a Fixed Route. If such a condition is found to exist, the staff member finds the caller Presumptively Eligible and enters his or her information into Adept (the agency’s trip reservation and accounting software).

Presumptive Eligibility provides an applicant full access to Paratransit services for 21 days or a more formal finding of eligibility (whichever comes first). The prospective rider is mailed an application, a Paratransit Rider Guide and a self addressed, stamped envelope to expedite return of the application.

**Application Review:**

Completed applications received are reviewed by a Transit Operations Assistant who is looking for clear signs that the sender is prevented from using a Fixed Route. The Op’s Assistant considers a broad range of barriers including (but not limited to):

- Physical or cognitive barriers presented by the applicant
- Local infrastructure at or near passenger access points
  - Curb cuts, absence of sidewalks, traffic control devices, ADA improvements, volume of cross streets and intersections, etc.
- Local geography
  - Uneven walking surfaces, inclines, stairs or other physical barriers
Based upon thorough review, the Op’s Assistant makes an initial eligibility finding and records the essential application information in the Client Profile of Adept. Possible outcomes include Presumptive Eligibility, Temporary Eligibility, Conditional Eligibility, Unconditional Eligibility and Ineligible (please see Section 2.2 for a brief description of each eligibility class).

If found eligible, the applicant receives a letter stating the conditions (if any) under which service has been approved. An identification card is included with the determination letter. An applicant who wishes to contest his or her finding (or class of finding) may appeal to the County Transit Manager within 60 days.

Upon Appeal:

The County Transit Manager will review the application and any attachments. He or she may call the applicant and/or his or her representatives for clarification or follow up information. The County Manager may also call for a Functional Assessment to help him or her arrive at an accurate finding.

**Functional Assessment:**

Mountain Valley Physical Therapy in La Grande has provided an Occupational Therapist to study the Fixed Route system in a live setting (using the Trolley, Standard Cutaway and ARBOC Kneeling buses). They have arrived at a set of clinical measures that empirically demonstrate a rider’s ability to use the Fixed Route (and under what conditions). If UC Public Transit Staff is unable to reach a firm conclusion based on the information provided by an applicant, a Functional Assessment by MV Physical Therapy is ordered.

If a Functional Assessment is ordered, the full cost of the assessment and travel expenses to and from the appointment are paid for by UC Public Transit. Upon arriving at a conclusion, the County Transit Manager responds to the applicant in writing within 30 days. His or her finding is final.
Periodic Review:

Paratransit Eligibility is periodically reviewed. In order to avoid a glut of reviews coming due at once, UC Public Transit performs reevaluations every four years on (or around) the applicant’s date of birth. Agency bias entering an eligibility review is paraphrased once fully Paratransit eligible, always fully Paratransit eligible.

Periodic Review is also the mechanism that allows Union County Public Transit to keep its rider data current. As a matter of best practices in data management, riders are never deleted. Rather passengers who have not ridden in twelve months (or those who are known to be deceased) are moved into Inactive status.
Section 5.0  Public Participation

The ADA requires a process for public input and ability to comment on changes to Public Transit. Providers of Paratransit are specifically required to feature on-going public participation in the operation and assessment of associated services for people with disabilities. Pursuant to the Union County Title VI Plan, the agency is also required to be:

- Proactive and measurable
- Early and continuous
- Intentionally promoted to be inclusive of low income, minority, limited English proficiency and for stakeholders living with disabilities

Union County Public Transit may be demonstrably the most progressive solicitor of Public Participation for mobility in eastern Oregon. In January 2014, a Title VI Advisory Council was seated to serve Union County featuring broad delegation from the Board of Directors. It is characterized by intentional diversity of age, gender, ethnicity, county geography, passenger mode, level of ability and socioeconomics (just to name a few). The presently seated members are:

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<tr>
<th>Voting Advisory Council Members</th>
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<tbody>
<tr>
<td>Daniel Bullock, Chairman EOU Seat <a href="mailto:bullocd@eou.edu">bullocd@eou.edu</a> (541) 786-1899</td>
<td>Yvonne Hill, Vice Chairman Bedroom Communities Seat <a href="mailto:thegoodgrammie@gmail.com">thegoodgrammie@gmail.com</a> (541) 562-6290</td>
</tr>
<tr>
<td>Deon Chandler At Large Member <a href="mailto:Pitts23203@yahoo.com">Pitts23203@yahoo.com</a> (541) 663-6734</td>
<td>Terry De Spain Business Community Seat <a href="mailto:terry@bronzebikerally.com">terry@bronzebikerally.com</a> (541) 398-1142</td>
</tr>
<tr>
<td>Joe Kresse Bicycle-Pedestrian Seat <a href="mailto:kressej@gmail.com">kressej@gmail.com</a> (541) 624-2119</td>
<td>Saira Siddiqui At Large Member <a href="mailto:coordinator@lagrandemainstreet.org">coordinator@lagrandemainstreet.org</a> (541) 963-1223</td>
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<td></td>
<td>Vacant Low Income Seat</td>
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<thead>
<tr>
<th>Non Voting Agency Staff Members</th>
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<tbody>
<tr>
<td>Frank Thomas Union County Transit Manager <a href="mailto:frank@ccno.org">frank@ccno.org</a> (541) 963-2877 Ext. 158</td>
<td>Roy Gomez Transportation Options <a href="mailto:roy@ccno.org">roy@ccno.org</a> (541) 963-2877 Ext. 4</td>
</tr>
</tbody>
</table>
The Union County Public Transit Advisory Council meets monthly. The Council’s By Laws require it to hold at least one meeting per year in every community Public Transit serves. In addition to formal Council meetings, Union County Public Transit’s Management has held eight public comment meetings (more than one in each community served) during the last fiscal year.

Consistent with its obligations under the ADA and other regulatory guidance, Union County Public Transit seeks public comment on all material changes to its operations including (but not limited to):

- Schedule
- Area of Service
- Fare
- Adoption of formal planning and long term guidance documents
- Emerging opportunities to apply for funding
Section 6.0 Implementation Plan

This policy represents several refinements to the one it replaces. The largest change is its focus on Union County rather than being regional in scope – which actually makes it easier to implement. Other material changes to remain ADA compliant include:

- Updates to schedules and fare structures
- References to a Title VI compliant Advisory Council
- Origin to Destination (rather than curb-to-curb)
- References to safe ability to load rather than specific metrics of mobility devices
- A comparison of ADA obligations to actual current practices
- Context sensitive No-Show policy
- On Time Performance Standard

As mentioned in the Executive Summary section, the need for immediate compliance got out in front of the agency’s planning functions in Fiscal Year 2014. HOWEVER, functional consistency does not suspend the agency’s public participation obligations. Adoption and implementation of this policy will proceed as follows:

- April 16, 2014 – Staff Draft Published
  - First draft goes to web site, public transit staff, Advisory Council and ADA stakeholders

- April 30, 2014 – Public Comment
  - Revised draft will be entertained in two public comment meetings in the affected community

- May 2014 – Second Publication
  - Vetted draft goes to web site for final comment

- June 2014 – Advisory Council Adoption
  - Final draft goes to the UC Public Transit Advisory Council for adoption

- July 2014 – Policy goes into practice

- Fiscal Year 2018 – Policy is subject to its next scheduled update
APPENDIX A: KEY AGENCY ADA STAFF

Margaret Davidson, Executive Director  margaret@ccno.org
Community Connection Administrative Office  (541) 963-3816 Phone
2802 Adams Avenue  (541) 963-3187 Fax
La Grande, Oregon 97850
Margaret has served the agency in various capacities for over 30 years. She has been actively engaged in livability issues (such as housing, after school programming, low income support services and supports for elders aging in place) that dramatically impact transit and community access. Since her promotion to Executive Director in 1997 the agency’s transit volume has grown from 32,850 to a peak of 111,400 rides per year.

Roberta Miller, Fiscal Manager  roberta@ccno.org
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2802 Adams Avenue  (541) 963-3187 Fax
La Grande, Oregon 97850
Roberta is in her 16th year with the agency. She and her staff are responsible for grant management, data collection and reporting.

Frank Thomas, Union County Manager  frank@ccno.org
Union County Public Transit  (541) 963-2877 Phone
2204 East Penn Street  (541) 605-0705 Fax
La Grande, OR 97850
Frank is in his 19th year with the agency. He is a graduate of the Transit and Paratransit Management program of the Graziadio School of Business Management at Pepperdine University. He is also a Certified Community Transit Manager. He has grown transit use in Union County by almost 480%.
Kate Sprauer  kate@ccno.org

Union County Public Transit  (541) 963-2877 Phone
2204 East Penn Street  (541) 605-0705 Fax
La Grande, OR 97850

Kate is in her 18th year with the agency. She has spent the last 6 years as a lead staff person at the Northeast Oregon Public Transit Building (the regional transit hub in La Grande). Kate is the staff member primarily responsible for Paratransit Eligibility.

Roy Gomez  roy@ccno.org

Union County Public Transit  (541) 963-2877 Phone
2204 East Penn Street  (541) 605-0705 Fax
La Grande, OR 97850

Roy is the holder of an AA in Graphic Arts from Eastfield College in Dallas, Texas. Polylingual, Roy provides Limited English Proficiency for Spanish, Mandarin, Portuguese and people who communicate using American Sign Language. Roy is in his 7th year with the agency.
APPENDIX B: PARATRANSIT APPLICATION

UNION COUNTY PUBLIC TRANSIT
APPLICATION FOR PARATRANSIT SERVICES

Proud Member of the Northeast Oregon

July 2014 REVISION
PLEASE READ BEFORE COMPLETING THE APPLICATION

UC Public Transit’s Paratransit service provides mobility to people who are certified as eligible under the standards of the Americans with Disabilities Act. We are obligated to strictly limit Paratransit to people who are “PREVENTED” from using a fixed route due to a disabling condition. By definition, eligibility is not based on:

- Age alone
- A disability or diagnosis by 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 eligibility is your ability to use a 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 or 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 NEOPT evaluation process includes:

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

**In-Person Evaluations:**

People seeking eligibility for Paratransit may be invited to complete an in-person evaluation. The purpose of the evaluation is to identify the best mobility option based on the applicant’s functional abilities. The evaluation will be performed by a qualified NEOPT Eligibility Worker.

Typically, an in-person evaluation results from conflicting or unclear information in your application. At the interview, the Eligibility Worker will review your application and discuss your travel abilities and limitations in more detail. The interview will take up to 30 minutes and may result in a referral for a Functional Assessment. At the end of the interview the Eligibility Worker will inform you if further evaluation is necessary.
**Functional Assessments:**

Functional Assessments are more common than in-person evaluations and will be performed on a percentage of all applications received – or reevaluations scheduled – annually. Provided by our partners at Mountain Valley Therapy, a functional assessment will determine whether you have the ability to use a fixed route and if so, under what circumstances.

The functional assessment will be conducted by a licensed medical professional (for example a physical or occupational therapist) in a clinical or actual transit setting depending on your abilities. The assessment may take up to one hour. You may need to go outside so please dress for the weather.

**Personal Care Assistance:**

If you require personal care assistance in any daily life function including using the restroom, your attendant must accompany you to a Paratransit evaluation or assessment. **NEOPT staff is not trained and is unable to assist you with personal care needs.**

**Evaluations:**

If you require transportation to an evaluation or assessment pursuant to this application, NEOPT will provide Paratransit to and from your appointment at no charge.

**Notice of Determination:**

You will be notified of the eligibility determination by letter within 21 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.

**Appeals Process:**

If you have any questions about your eligibility determination, you may contact NEOPT as indicated in the letter to review our decision.

Applicants who are determined not eligible or who do not agree with the conditions established for their use of Paratransit may request an appeal which must be filed within 65 days from the date of the initial determination. Information on how to request an appeal will be included with the eligibility determination letter.

**PLEASE FOLLOW THE INSTRUCTIONS ON PAGE 3 TO COMPLETE THE PARATRANSIT ELIGIBILITY APPLICATION**
INSTRUCTIONS

Step 1 If you feel you qualify for Paratransit services after reviewing the introductory information, you or your representative should complete the application. Answer all questions completely and to the best of your ability.

Step 2 Be sure to sign the application! Incomplete or unsigned applications will be returned to you.

Step 3 Complete and sign the Medical Release Form.

NOTE: This is not a request for medical records or a requirement for 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.

Examples of health care professionals include:

Certified Orientation and Mobility Specialist  Physical Therapist
Chiropractor  Psychiatrist
DSHS/DDD Case/Resource Manager  Psychologist
HCS/AAA Case Manager  Recreation Therapist
MSW employed by a medical facility  Registered Nurse / Nurse Practitioner
Occupational Therapist  Special Education Teacher
Physician  Vocational Rehabilitation Councilor
Physician Assistant

Step 4 Return the completed application and attachments using the provided self-addressed, stamped envelope or mail to:

Paratransit Determination
Union County Public Transit
2204 East Penn Avenue
La Grande, OR 97850

Step 5 After your application has been reviewed, you will be contacted by phone to schedule any necessary evaluations or assessments.

Questions? Please call the NEOPT office at 541-963-2877 from 8am to 5pm Monday through Friday. Materials are available in large print and other alternative formats. Assistance for non English speaking applicants is also available.
APPLICATION FOR UNION COUNTY PUBLIC TRANSIT
PARATRANSIT SERVICE

General Information: Please read carefully. All questions must be answered. Incomplete or unsigned applications will be returned.

PART A. PERSONAL INFORMATION

Name: Last ______________________ First _____________________ Initial _______

Home Address: ________________________________________ Apt. #: __________

Name of facility or apartment building: ______________________________________

City: ________________________________  State: OR Zip: _________________

Mailing address if different: ________________________________________________

City: ________________________________  State: ______ Zip: _________________

Home Phone: ______-_____-_________        Other: ______-_____-_________

Date of Birth: ______-_____-_________  □ Male  □ Female

PART B. CONTACT PERSON

Emergency Contact Person: _________________________________________________

Relationship to Applicant: _________________________________________________

Emergency Number(s)  Primary: ______________________________

Other: ______________________________
PART C. FIXED ROUTE BUS SERVICE USE

1) Have you used NEOPT’s Trolley or other regular fixed route service?
   □ Yes    □ No

2) Are you aware that all NEOPT fixed route vehicles are fully accessible to accommodate people who use wheelchairs, scooters or persons who are unable to climb the bus steps?
   □ Yes    □ No

3) Are you able to reach the NEOPT bus stop nearest your home?
   □ Yes    □ No    □ Sometimes

   If your answer is sometimes, please explain: _______________________________________________________

4) What best describes your ability to use NEOPT’s regular fixed route bus services?
   □ I can use the fixed route for most of my transportation needs
   □ I have never attempted to use the fixed route
   □ I could use the fixed route but it would be difficult because:
      _____________________________________________________________________________________________

   □ I can use the fixed route service on for specific destinations because:
      _____________________________________________________________________________________________

   □ I cannot use the fixed route without the help of a personal care attendant
   □ I cannot use the fixed route at all because:
      _____________________________________________________________________________________________

PART D. YOUR TRAVEL ABILITIES AND NEEDS

1) I can get to and from the fixed route stop nearest my home either by walking or using my mobility device.
   □ Yes    □ Not Sure    □ Sometimes/No (please explain why):
   _____________________________________________________________________________________________

2) 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 why):
   _____________________________________________________________________________________________
3) I can get on and off a fixed route bus (all fixed route buses feature lifts and ramps that can be used by anyone including people who can’t climb steps or use wheelchairs or scooters)

☐ Yes       ☐ Not sure       ☐ Sometimes/No (please explain why):

__________________________________________________________

4) 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 why):

__________________________________________________________

5) I can follow written or oral instructions about how to use the bus.

☐ Yes       ☐ Not sure       ☐ Sometimes/No (please explain why):

__________________________________________________________

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

☐ Yes       ☐ Not sure       ☐ Sometimes/No (please explain why):

__________________________________________________________

7) Are there any other reasons why you can’t board or ride regular NEOPT fixed route buses?

☐ Yes       ☐ No other reasons       ☐ No, but prefer not to

If you answered yes, please explain:

__________________________________________________________

__________________________________________________________

| PART E. INFORMATION ABOUT YOUR DISABILITY OR CONDITION |

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

__________________________________________________________

Date of diagnosis or onset: ________________________________
2) Do you have other physical or cognitive conditions that limit your ability to use a fixed route?

☐ Yes       ☐ No

If you answered yes, please explain:______________________________________________________

____________________________________________________________________________________

3) Do the effects of your disability vary from day to day?

☐ Yes       ☐ No

If you answered yes, please explain:______________________________________________________

____________________________________________________________________________________

4) Is your disability of condition:

☐ Permanent       ☐ Temporary (How long: _____Months _____Years)

If you answered yes, please explain:______________________________________________________

____________________________________________________________________________________

PART F. MOBILITY EQUIPMENT AND PERSONAL ASSISTANTS

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

☐ Prosthetic Device

☐ Other (please describe): ________________________________

2) If you use a scooter or a wheelchair, are you able to transfer to a seat in a vehicle?

☐ Yes       ☐ No

3) If you use a scooter or a 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 or a wheelchair, is the total combined weight of you and your mobility device more than 600 pounds?

☐ Yes ☐ No ☐ Not sure

5) NEOPT Operators are unable to perform the duties of a Personal Care Attendant (PCA). Will you need to travel with a PCA or someone to assist you if you use Paratransit?

☐ Always ☐ Sometimes ☐ Never

A. If always or sometimes, how does a PCA or other person assist you?

☐ All activities of daily living
☐ To help me get to the vehicle when it arrives
☐ By pushing my manual wheelchair
☐ To help me get to my destination from the vehicle
☐ To assist me on and off the vehicle with my carry on items
☐ Other (please describe below):

6) Some people can’t be left alone at their residence of other destinations (for example, people living with Alzheimer’s disease or other forms of dementia). Does someone always need to meet you when you arrive at a destination?

☐ Yes ☐ No

PART G. 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 at 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 the environmental conditions that affect your ability to get to and from a fixed route bus stop, or to and from a destination using a fixed route bus. Please explain below.

Due to the nature of my disability, in order to travel, I must:

☐ Avoid inclines
☐ Be on a sidewalk or pathway with an even surface
☐ Avoid steep hills
☐ Avoid hours of darkness

Please explain: __________________________________________________

Due to the nature of my disability, all intersections in my path:

☐ Must have curb cuts
☐ Must have a clearly marked pedestrian crosswalk
☐ Must have both a pedestrian crosswalk and a traffic signal

Please explain: __________________________________________________

☐ Additional potential barriers (please explain):

_________________________________________________________________

3) Please check the specific weather conditions that (because of your disability) prevent you from using a fixed route:

☐ The weather does not affect my disability
☐ Snow
☐ Ice
☐ Heat: Above ________ degrees F
☐ Cold: Below ________ degrees F

Please explain how the conditions you check would affect your ability to get to or from a bus stop or your destination:
_________________________________________________________________

PART H. MEDICAL RELEASE AUTHORIZATION FORM

It may be necessary for NEOPT 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. NEOPT will not release your information to any other party, any medical information obtained with the release(s) you provide.
PART I. PLEASE READ BELOW BEFORE SIGNING THE APPLICATION

For the applicant:

Applications must be signed. Unsigned applications will be returned.

I understand that the purpose of this application is to determine whether I am eligible to use NEOPT’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 provide will be disclosed only as needed to evaluation 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 NEOPT’s expense and discretion, in order to determine my eligibility for Paratransit services.

If I am found eligible or conditionally eligible, I understand that NEOPT will periodically audit, update, reevaluate and purge its Paratransit caseload. I understand that my eligibility may be pulled for redetermination at anytime. 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:

If someone other than the applicant assisted in completing this application, that person must complete and sign the following:

Relationship to applicant: ________________________________________________________________

Name: _____________________________________________________________________________

Address: __________________________________________________________________________

Phone: _____-____-_____   Organization or agency affiliation: ________________________________

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 use of a regular fixed route transit system:

☐ Yes    ☐ No

_________________________________________________________  __________
Representative Signature                                    Date
PART J. RETURNING THE APPLICATION

Before returning the application, please be sure that:

- You have answered all questions parts A through G
- You have signed Part I and the Medical Release
- If another person (not the applicant) completed the application, that person has to complete the information in, and sign Part I

To submit your application, please use the self addressed, stamped or metered envelope that came with this application or mail your application to:

Eligibility Determination  
Union County Public Transit  
2204 East Penn Avenue  
La Grande, OR 97850

If you have questions or need assistance I completing the application, call NEOPT at 541-963-BUSS (2877).
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 Americans 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 (excludes psychotherapy notes)  ________ Reproductive Health (including 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 in 90 days.

I understand that I am not legally obligated to sign this authorization 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 a 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 redisclosure
and no longer be legally protected. However, I also understand that federal or state law may restrict redisclosure 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 __________________________
APPENDIX C: CIVIL RIGHTS COMPLAINT PROCESS

Notification:
Union County Public Transit posts basic Title VI notifications in our buses, bus shelters, on our web site and in our printed materials (such as rider guides and policy handbooks). A full framed version of the entire Title VI notification is posted in the waiting room of our multimodal transit hub. See Appendix A for the full versions of our notifications and snapshots of where they can be found.

Procedure:
Union County Public Transit has established a formal compliant procedure for handling and tracking Title VI complaints. The full procedure is available in the guidebook that includes our complaint form. Among other things, it includes:

How To File a Title VI Complaint:
A Title VI complaint form is available at our office at 2204 East Penn Avenue in La Grande and online at www.neotransit.org/union-county/title-vi (where it can be filled out and submitted online or downloaded for manual completion). A copy of our form is included in Appendix B for your ease of reference.

A complainant may submit his or her completed form to our service office, our administration office (if he or she prefers) or may bypass UC Public Transit altogether and file directly with FTA.

UC Public Transit provides complaint forms and procedures in Large Print and alternative formats upon request. We provide Title VI Complaint Forms and procedures in Spanish as a part of our Limited English Proficiency obligation under FTA Circular 4702.1B.

How Union County Public Transit Responds to Title VI Complaints:
Upon receipt of a Title VI complaint, the Union County Transit Manager will:

1) Log the complaint into the local Title VI register and assign a case number.

2) Determine the jurisdiction of the complaint. As a multimodal transit hub serving four counties we frequently receive input on services for which we are not responsible.
3) Notify the Community Connection of Northeast Oregon, Inc. Executive Director of receipt of a Title VI Complaint and the jurisdiction subject to the complaint.

4) Mail, email, fax or in a fashion appropriate to the nature of the manner in which the complaint was received, provide a written acknowledgment that the complainant has been received, including the case number.
   a. If the complaint stems from the actions of a service for which Union County Public Transit is not responsible, the Union County Transit Manager will refer the complaint in its entirety to the correct recipient, note the Title VI Log and guide the complainant to the correct jurisdiction.

5) Within seven (7) calendar days from the log date, the Union County Transit Manager or CCNO Administrative staff will investigate the full complaint including (but not limited to):
   a. Clarifying questions with the complainant
   b. Interviewing staff alleged to be involved
   c. Inquiring with witnesses to alleged event(s)
   d. Consult with local and state Civil Rights experts
   e. Follow up conversations with complainant

6) Within ten (10) calendar days from the log date, the Union County Transit Manager or CCNO Administrative staff will provide the respondent(s) and CCNO Executive Director with a written account of the investigation(s) and finding(s). The respondent(s) will have ten (10) calendar days from the date of notification to accept the account of events or furnish his or her written response to the allegation(s).

7) Within thirty (30) days from the log date, the Union County Transit Manager will take all corrective actions deemed to be necessary and appropriate.

8) Within sixty (60) days from the log date, UC Public Transit’s final investigative report and a copy of the complaint will be forwarded to the complainant(s), respondent(s), CCNO Executive Director, ODOT Public Transit and the Federal Transit Administration’s Office of Civil Rights.

9) If a complainant is not satisfied with the results of an investigation, he or she may appeal to the Federal Transit Administration’s Office of Civil Rights.
On an annual schedule dictated by ODOT Public Transit, Union County Public Transit will submit copies of its Title VI logs, complaints, investigations, mediations and/or law suits.

For ease of entry and flexibility of reporting, Union County Public Transit, uses double entry (both manual and in Adept) to track the receipt and disposition of Title VI complaints.
## UNION COUNTY PUBLIC TRANSIT
### TITLE VI COMPLAINT FORM

### SECTION 1:

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<th>Name:</th>
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<td>Address:</td>
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<td>State:</td>
<td>Zip:</td>
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<td>Email:</td>
<td>Phone:</td>
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Do you require (please check all that apply):  
- Spanish? [ ]  
- Large Print? [ ]  
- TTY? [ ]  
- Audio / Staff Assist? [ ]

### SECTION 2:

Are you filing this report on your own behalf?  
- Yes [ ]  
- No [ ]

If you checked Yes, please skip to SECTION 3.

If you checked No above, please supply the name of the person for whom you are complaining and your relationship to him or her.

[ ]

Please explain why you have filed on behalf of a third party.

[ ]

Please confirm that have obtained the permission of the aggrieved person(s) if you are filing on behalf of a third party.

- Yes, I have obtained permission [ ]  
- No, I have not obtained permission [ ]
SECTION 3:

I believe the discrimination I experienced was based on (please check all that apply):

- Race
- Color
- National Origin

Please provide the date of the alleged discrimination (month, date and year):

Please explain what happened as clearly as possible. Why do you believe you were discriminated against? Describe all persons(s) who were involved including the name and contact information (If you have it) of the person(s) who discriminated against you. Please list names and contact information for any witnesses you may have. Please include additional sheets if necessary.
SECTION 4:

Have you filed a previous Title VI complaint with this agency?

☐ Yes  ☐ No

Have you filed this complaint with any other federal, state or local agency or with any federal or state court?

☐ Yes  ☐ No

If you answered Yes, please check all that apply:

Federal Agency  ☐
Federal Court  ☐
State Agency  ☐
State Court  ☐
Local Agency  ☐

Please provide any information you may have on contact people at the Court(s) or Agency(ies) where you have filed this complaint.
SECTION 5:

Please provide the name of the agency (If known) that this the subject of this complaint?

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<th>Contact Person</th>
<th>Title</th>
<th>Phone Number</th>
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SECTION 6:

Please sign and date your complaint below. Please include copies of any support materials you wish to have considered in this matter.

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<th>Complainant</th>
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<tr>
<th>Assistant (If someone helped you file this complaint)</th>
<th>Date</th>
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Sample page from Title VI Complaint Log

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<tr>
<th>Case #</th>
<th>Date Received</th>
<th>Complainant</th>
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