



Paratransit Service Plan

**Prepared for:
Washington State Dept of Transportation**

**Prepared By:
Cowlitz Transit Authority d.b.a. RiverCities Transit
(Operated under contract by the City of Longview)**

**254 Oregon Way
Longview, WA 98632**

Updated August 19, 2013

Amended by CTA Board January 14, 2015

Table of Contents

I.	GENERAL CONTACT INFORMATION	3
II.	RiverCities Transit – FIXED ROUTE SYSTEM	4
	a. Overview.....	4
	b. Route Structure, span of service, and frequency of service	4
	c. Fare structure.....	4
	d. Vehicle Inventory.....	5
III.	RiverCities Transit – EXISTING PARATRANSIT SERVICES.....	5
	a. The Eligibility Process	5
	b. The Administrative Appeal Process	6
	c. Identification of other Service Providers	6
IV.	RiverCities Transit –PARATRANSIT OPERATING POLICIES.....	7
	a. Reservation Process	7
	b. Personal Care Attendants.....	7
	c. Policy for Visitors	7
	d. Trip Restrictions	8
	e. Door-to-Door Service	8
	f. Subscription Service.....	8
	g. Service Animals	8
	h. Carry On Baggage	8
	i. Mobility Devices.....	8
	j. Use of Seat Belts and Securement Devices.....	9
	k. Mentally or Cognitively Impaired Riders.....	9
	l. Late Cancelations and No Shows	9
	m. Suspension of Eligibility	11
	n. Lack of Capacity Constraints.....	12
	o. Service Disruptions	12
	p. Suspension due to Service Disruptions	13
	q. Restoration of Service	14
V.	COMPARISON OF CURRENT PARATRANSIT POLICIES TO ADA REQUIREMENTS.....	15
VI.	PUBLIC PARTICIPATION AND INFORMATION	18
	a. Efforts to Include Persons with Disabilities in Planning Process	18
	b. Availability of the Plan in Accessible Format.....	18
	c. Documentation that Draft Plan was Subject to Public Review and Comment.....	18
	d. Documentation of Issues Raised by Public and How They Were/Will be Addressed	19
VII.	IMPLEMENTATION PLAN	20
IX.	APPENDIX.....	21
	Table 1 - RCT Fixed-Route.....	22
	Table 2 - Paratransit Vehicle Fleet.....	23
	Administrative Appeal Process	24
	Eligibility Application	27

I. GENERAL CONTACT INFORMATION

This Americans with Disabilities Act (ADA) Paratransit Plan has been developed in accordance with the Code of Federal Regulations (CFR) Title 49 CFR Part 37 Subpart F, revised October 1, 2011. It has been prepared for:

Agency Name: Cowlitz Transit Authority (d.b.a. RiverCities Transit)

Mailing Address: 254 Oregon Way, Longview WA 98632

Telephone: (360) 442-5662

Fax: (360) 442-5979

Website: www.rctransit.org

Authorized Representative: Corey Aldridge, Transit
Manager corey@rctransit.org

ADA Update Contact Person: Amy Asher, Mobility Supervisor
amy@rctransit.org

II. RiverCities Transit – FIXED ROUTE SYSTEM

a. Overview

The Cowlitz Transit Authority is a Public Transportation Benefits Area that collects sales tax revenue to support public transportation in its service area. The current sales tax levy is three tenths of a percent. The Cowlitz Transit Authority contracts with the City of Longview for the actual provision of service known as RiverCities Transit.

RiverCities Transit (RCT) serves the Kelso-Longview UZA. This is a small urbanized area with a population of approximately 63,952 located in Cowlitz County Washington. The complimentary paratransit service operates under the name RiverCities LIFT.

	<u>Annual Ridership</u>	<u>Annual Operating Expenditures</u>
2013	359,742	\$2,663,089
2012	381,018	\$1,950,899

* Based on 2013 WSDOT Summary of Public Transportation Report

b. Route Structure, span of service, and frequency of service

RCT operates seven fixed-routes within the city limits of Longview and Kelso, Washington. Four routes operate at a 60-minute frequency; one route operates at a 40-minute frequency; two routes operate at a peak frequency of 30 minutes and off-peak frequency of 60 minutes.

Four routes, including all the routes with frequency better than 60 minutes, connect at the Longview Transit Center. Four routes also connect with Amtrak and Greyhound at the Kelso Train Depot.

RCT currently operates six days a week. Monday through Friday service is operated from 6:30 AM to 7:00 PM. Saturday service is operated from 8:00 AM to 6:00 PM. During periods of inclement weather, RCT operates on a revised schedule and route, operating only on major streets and hills that have been made safe for travel.

c. Fare Structure

RCT's current fare structure is:

One way cash fare	\$.60 regular \$.30 senior and disabled
Day Pass	\$1.20 regular \$.60 senior and disabled
Monthly Pass	\$10 adult \$6 student \$5 senior and disabled
Quarterly Pass	\$30.00 adult \$18.00 student \$15.00 senior and disabled
Annual Pass	\$120.00 adult \$72.00 student \$60.00 senior and disabled

Seniors citizens are those 62 and older. Children 6 years old and younger are free.

d. Vehicle fleet inventory including accessibility and wheelchair capacity

RCT’s fixed-route fleet consists of thirteen 35-foot Gillig buses. All buses are equipped with lifts or ramps to be ADA accessible. All fixed route buses have two designated wheelchair bays and priority seating for senior and disabled riders.

III. RiverCities Transit – EXISTING PARATRANSIT SERVICES

RiverCities Transit’s ADA Paratransit Service is offered in accordance with the Americans with Disabilities Act of 1990. The ADA Paratransit service is for persons with physical, cognitive, emotional, visual or other disabilities which functionally prevent them from using the public fixed-route bus system known as RiverCities Transit, either permanently or at certain times of the year. Disability alone does not create eligibility. The decision is based solely on the applicant’s functional ability to use RCT buses.

RiverCities Transit provides complementary paratransit service under the name RiverCities LIFT. It operates within ¾ of a mile of the fixed-route service and provides complementary paratransit service based on eligibility. RCT staff determines eligibility and policies, but the actual provision of service is contracted out to a private provider. RiverCities LIFT is a shared ride service and passengers should expect to share their ride with other individuals. RiverCities LIFT days and hours of operation mirror the RCT fixed-route schedule. Weekday service is operated from 6:30 AM to 7:00 PM. Saturday service is operated from 8:00 AM to 6:00 PM.

RiverCities LIFT fares are the same as fixed-route adult fares. Reservations are accepted by 5:00 p.m. the day before the trip and also up to 14 days before the trip. RCT LIFT service has fourteen (14) wheelchair equipped buses and two minivans with a ramp.

	<u>Annual Ridership</u>	<u>Annual Operating Expenditures</u>
2013	59,381	\$1,305,552
2012	63,047	\$1,197,281

* Based on 2013 WSDOT Summary of Public Transportation Report

a. The Eligibility Process

The application process includes a two part application: the first section is to be completed by the individual, the second to be completed by a medical professional. A copy of the application can be found in the appendix of this report. A potentially eligible person may request an application several different ways.

- In person at the RCT Administration office located at 254 Oregon Way in Longview
- In person at the RCT Transit Center located at 1134 12th Avenue in Longview
- By mail by calling RCT Customer Service at 360-442-5663
- By fax at 360-442-5979
- By email at customerservice@rctransit.org
- By downloading from the RCT website rctransit.org under the Services tab

The application, which includes a description of the certification process, is available in alternate formats as requested by an individual.

Incomplete applications will be returned to the applicant. If the completed application does not provide enough information to make a determination, RCT may conduct an in person interview and assessment. The in person interview, the final phase of the application process, is scheduled when all sections of the application are received. The decision of eligibility will be made by RCT staff after reviewing the completed evaluation, medical verification and conducting the interview. All persons who, by reason of disability, are unable to use the accessible fixed route bus service are eligible to use the paratransit service after completing the necessary eligibility and registration procedures.

There are three levels of eligibility.

1. Unconditional Status - Assigned to persons who are determined unable to independently use fixed-route buses even with training. Those granted unconditional status will be required to re-apply once every three years.
2. Conditional Status - Assigned to persons who are able to use fixed-route buses some of the time, but would under certain circumstances, and for certain trips, be prevented from independently using fixed-route buses. Those granted conditional status will be required to re-apply once every three years.
3. Temporary Status - Assigned to persons who are determined capable of using fixed-route buses but cannot do so at present, either because of a temporary disability or condition.

Applications are processed within 21 days of receipt. If RCT is unable to determine a person's eligibility in that period of time, the person will be treated as eligible and provided service until a determination is made.

Notice of determination will be sent to the applicant within the 21 days required, in a format accessible to the person. A copy of the 60-day appeal procedure will be included for customers given conditional or temporary eligibility, or were found not eligible.

b. The Administrative Appeal Process

RCT's appeal process will comply with paragraph 49 CFR 37.125 of the ADA regulations.

An individual who has been denied eligibility or eligible but with specified conditions may request an internal administrative appeal. Customers whose service is suspended may also request an internal administrative appeal.

RCT's Appeal Process can be found in the appendix of this plan.

c. Identification of Other Service Providers

In addition to RiverCities Transit, there are other service providers who operate transportation systems that are either open to the public or specific populations such as Medicare clients.

Lower Columbia Community Action Program - Operates several services in Cowlitz County. They operate a rural transportation system on the I-5 corridor between Vancouver and Centralia. This does include a stop at the Longview Transit Center. They also operate a Medicare and seniors transportation system within Cowlitz County, but they will not do trips where both the origin and destination are within our service area.

Columbia County Rider - A rural transportation service operated by Columbia County, Oregon, that connects residents of that county to the Kelso-Longview area. Columbia County is a rural community that does not possess the retail, commercial, or medical opportunities present in the Longview-Kelso area.

Wahkiakum on the Move - A rural transportation service operated by Wahkiakum County Washington that connects residents of that county to the Kelso-Longview area. Wahkiakum County is a rural community that does not possess the retail, commercial, or medical opportunities present in the Longview-Kelso area.

IV. RiverCities Transit – PARATRANSIT OPERATING POLICIES

RiverCities Transit Paratransit Service is a shared ride service that provides origin to destination service. As a shared ride service, riders should assume that they will share a vehicle with other riders and that the vehicles used will vary based upon the operational demands on any given day. RiverCities Transit’s Paratransit service will operate according to the following policies.

a. Reservation Process

Reservations will be accepted 24 hours a day. Outside of normal business hours, customers may leave their trip request information on a voicemail system.

Customers must reserve their trip by 5:00 p.m. the day prior to requested service except for reservations on Mondays which must be made by 4:00 p.m. on Saturdays. Reservations may be made up to 14 days in advance of the trip.

RCT will schedule the trip for as close as possible to the requested time however we reserve the right to negotiate up to an hour before and an hour after the requested time.

b. Personal Care Attendants

Personal Care Attendants may ride RCT at no charge when they are accompanying an eligible individual who requires a Personal Care Attendant. The Personal Care Attendant must board and disembark at the same location as the RCT customer.

c. Policy for Visitors

RCT provides complementary paratransit service to ADA paratransit eligible visitors within the ADA service area. Visitors who present documentation of their ADA paratransit eligibility from the jurisdiction in which they reside will be granted eligibility for 21 days during any 365-day period beginning with the visitor’s first use of the service during a 365-day period. Documentation may include, but is not limited to: a letter from the jurisdiction or the visitor’s current paratransit ID card from the jurisdiction in which they reside.

Visitors with disabilities, who are unable to present documentation of ADA eligibility, may be required to present documentation of residence and his or her disability. Eligibility shall be granted for 21 days of service during any 365-day period beginning with the visitor’s first use of the service during a 365-day period.

Visitors are required to pay the fare, as defined in the fare policy. If the service extends beyond the visitor definition of 21 days during any 365-day period, they must complete the application process in order to continue using RiverCities LIFT.

d. Trip Restrictions

RCT will not permit trip limits or trip purpose restrictions on eligible customers. Passengers who travel between their origin and destination on a daily basis may ride with passengers who travel at the same time interval.

e. Door-to-Door Service

RCT will provide origin-to-destination service to anyone who is eligible for paratransit service. If additional service such as door-to-door is needed it will be evaluated at the time of the application.

Due to the shared ride aspect of the service, it is the transit operator's duty to ensure the safety of all passengers using the service, vehicle operators must stay within non-interrupted visual range of their vehicle. Riders will be escorted to/from the street level entrance of their origin/destination as long as the operator can stay within visual range of their vehicle. For example, operators would not be able to accompany a passenger to the second floor of a building.

f. Subscription Service

Subscription service is also offered as a service to RiverCities LIFT customers. Subscription service may not consume more than 50 percent of the total trips available at a given time of day if it presents a capacity issue. Subscribers will be customers who travel one or more days to the same destination at the same time each week. Subscription service is offered on Saturdays and must occur before 4:00PM.

A subscription service waiting list may be developed when the subscription service program is at capacity. RCT shall reduce the amount of subscription service if it creates capacity constraints for other customers.

g. Service Animals

RiverCities Transit will transport any service animal that meets the Federal Transit Administration definition of a service animal. Riders utilizing a service animal during a trip should declare that one will accompany them at the time of travel. Service animals should be under the control of the passenger at all times and must not misbehave, soil the vehicle, harass other riders or act in an aggressive manner.

h. Carry On Baggage

Eligible riders may bring no more than four grocery size bags on board. Operators will assist in carrying no more than four grocery size bags from their vehicle to the door of the trip destination as long as the weight of those bags poses no safety hazard or injury risk.

i. Mobility Devices

All RiverCities Transit vehicles are equipped with lifts/ramps to accommodate mobility devices. RiverCities Transit will transport any passenger and mobility device that fit on the lift/ramps and can maneuver into and out of securement locations. Passengers and mobility devices exceeding the rated capacity of vehicle lifts or ramps may be denied access if they create safety or mechanical problems.

j. Use of Seat Belts and Securement Devices

All riders must wear seat belts. If you are riding in a mobility device, then your mobility device will be secured to our vehicle via a securement system. We may refuse to transport you if you will not allow your mobility device to be properly secured prior to transport.

k. Mentally or Cognitively Impaired Riders

Some riders are mentally or cognitively impaired or have severe memory problems such that they cannot be safely left alone on their own at either the pick-up point or the drop-off point. It is the responsibility of the rider’s caregivers or family to clearly identify these clients to RiverCities LIFT staff.

The vehicle operator cannot act as an attendant for these riders. Cognitively impaired riders will be allowed to travel without an attendant only as long as they exhibit safe behavior when traveling. An attendant or caregiver must be present at the pick-up and drop-off points for riders who cannot be left alone. If a responsible caregiver is not present when the vehicle operator attempts to pick up or drop off these riders, it will count as a service disruption.

l. Late Cancellations and No Shows (Revised December, 2014)

Passenger no-show trips and late cancellations affect both LIFT customers and the Cowlitz Transit Authority. Passenger no-shows reduce efficiency due to wasted fuel and time lost verifying that a customer is a no-show; further, both no-shows and late cancellations lead to unused capacity on runs and decreased productivity. No-shows and late cancellations also unfairly impact other customers by causing unnecessary detours and delays.

RiverCities LIFT’s No-Show Policy and Procedures were developed in accordance with the Federal Transit Administration (FTA) guidelines for ADA complementary Paratransit service.

U.S.DOT regulations 49 CFR 37.125(h) address the issue of no-show policies in ADA complementary paratransit service programs, and state that: *“The entity may establish an administrative process to suspend, for a reasonable period of time, the provision of complementary paratransit service to ADA paratransit eligible individuals who establish a pattern or practice of missing scheduled trips. Trips missed by the individual for reasons beyond his or her control (including, but not limited to, trips which are missed due to operator error) shall not be a basis for determining that such a pattern or practice exists.”*

Procedures

Scheduling Trips: RiverCities LIFT schedules pick-up and return trips separately. In accordance with FTA Regulations, RiverCities LIFT assumes all scheduled return trips are needed unless notice is given by the passenger or their representative. If a passenger is a No-Show their first trip of the day, RiverCities LIFT will not automatically cancel subsequent trips of the day. This is consistent with FTA regulations. If, however, the passenger does not need the subsequent trip(s), they should cancel them as soon as possible out of courtesy for other riders.

A \$5 will call fare will be charged for will call trips, defined as return trips for appointments in which the pickup time is not prearranged (e.g. medical or legal appointments), or when a van is required to be dispatched to pick up a passenger subsequent to a missed pick up that was within the passenger’s control. Will call trips are considered non-ADA service. Trips in which a passenger changes the return trip time less than one hour prior to the scheduled return trip will also be considered ‘will call’ service and the \$5 ‘will call’ fare will be charged. The \$5 fare will be waived for return trips rescheduled one hour or more before the pre-arranged pickup time.

Definitions

A no-show is a trip that has not been canceled at least two (2) hours prior to the scheduled pick-up time. If a passenger fails to board the vehicle within five (5) minutes of the arrival of the vehicle, as long as the driver arrives within the pick-up window, the passenger will be charged with a no-show.

A no-show occurs when:

- There has been no call by the passenger (or the passenger's representative) to cancel the scheduled trip time AND
- The vehicle arrives at the scheduled location within the scheduled time AND
- Upon not seeing the passenger at the designated pick-up location the driver radios dispatch AND
- The operator cannot reasonably see the customer approaching the vehicle after waiting five minutes AND
- The Dispatch office is notified. At this time, Dispatch will give instructions as to how to proceed. This process is recorded for our no-show records.

A no-show may also be charged when:

- The driver arrives and the passenger cancels his/her ride.
- The passenger arrives to take the ride as the driver is leaving.

If the passenger has a no-show, the passenger will be notified by letter sent to the mailing address on file. The letter will notify the passenger of how many no-shows have occurred in the last 60 days. If the passenger feels that the no-show should be excused, they should contact the phone number listed in the letter as soon as possible.

No-Shows for reasons that are beyond the passengers control will not be counted. Examples of excused no-shows include, but are not limited to:

- Illness
- Sudden turn for the worse in someone with a variable condition
- Accidents
- Family emergency
- Personal Care Attendant who did not arrive on time to assist the rider
- Passenger's appointment ran long and did not provide opportunity to cancel in a timely way
- Passenger's mobility aid failed
- LATE connecting transportation: late transfer trip, train, etc. caused the passenger to miss the trip
- APPOINTMENT CANCELED/DELAYED for reasons that are not the passenger's fault
- ACTS OF GOD: Flood, earthquake, etc.
- STAFFING ERROR: Staff did not note the cancellation request or passenger just realized that staff scheduled the trip inconsistently with the passenger's request
- Another person canceled passenger's appointment
- Bus arrival past the scheduled pick up window

Repeated failures to take scheduled trips, regardless of the reason, are subject for review.

Trips can be canceled 24 hours a day by calling the regular RiverCities LIFT phone number at (360) 442-5667.

No-Shows that are not excused

No-Shows are not excused when the trip is not canceled at least two (2) hours prior to the scheduled

pick-up time and is missed for reasons that include, but are not limited to:

- Passenger didn't want to travel today
- Passenger changed their mind about using appointment
- Passenger didn't know that he/she had a ride scheduled or was supposed to call to cancel
- Passenger got another ride
- Passenger told someone else he/she was not planning to travel (driver, facility, etc.) or someone else booked the ride for him/her.
- Passenger does not want to ride with specific driver or passenger, or on a specific vehicle

Pattern or Practice of Excessive No-Shows

A pattern or practice involves intentional, repeated or regular actions that are not isolated, accidental or singular incidents.

No-Show Policy

Those passengers who have been recorded as having three (3) or more no-shows in a 60 day period will be reviewed to identify the passenger's trip and no-show history as well as their frequency of travel. Each no-show will be verified as being correct before suspensions are proposed.

Those passengers whose no-show rate is more than three (3) AND is in excess of the average no-show rate for the 60 day period may have sanctions or suspensions imposed if the no-shows are determined to constitute a pattern.

m. Suspension of Eligibility for Excessive No-Shows

Repeated failures to take trips as scheduled, regardless of the reason, are subject for review. Customers incurring excessive no show or late cancellations may be warned and then suspended for a reasonable period. Repeated violations of this policy will result in longer suspension periods each time. The following suspension periods shall apply to violations of this policy that occur within the same rolling 12-month period.

- 1st No-Show – Written letter outlining no-show policy and penalties.
- 2nd No-Show - Written warning and reminder of no-show policy and penalties including listing of dates of no-show events.
- 1st Violation - occurs upon verification of 3 no-shows and greater than average no-show rate for the 60 day period -7 day suspension.
- 2nd Violation – occurs if passenger has a 4th no-show in a 60 day period and greater than average no-show rate for the 60 day period - 1 month suspension.
- 3rd Violation and thereafter– increasing penalties by one (1) week.

Sanctions will be imposed no sooner than fourteen (14) days after the notice has been sent to allow for alternate travel plans. The notice will include the start date for the sanctions and will list no-show events that led to the suspension.

Any passenger who has had their service suspended may submit a written request to file an appeal of their suspension. The appeal must be received within 60 days of the suspension notice. A copy of the appeals process can be found in the appendix. Any passenger appealing their suspension will continue to have service until their appeal is heard unless their suspension is due to a violent or illegal act.

Any passenger who has had their service suspended for less than 30 days shall have their service automatically restored upon the completion of the suspension as it is listed in the written notice of their suspension. Any passenger who has had their service suspended for 30 days must contact RiverCities Transit Supervisor to have their service restored. A staff contact person will be listed in the written notification of their suspension. The purpose of this contact is to identify any issues or concerns that have caused so many incidents to occur. Staff will work with the passenger to identify solutions or strategies to minimize future incidents. If a passenger who is suspended for 30 days chooses not to contact a RiverCities Transit Supervisor to discuss their suspension, then they are voluntarily choosing not to use RiverCities LIFT and this is not a denial of service.

Suspension of eligibility for persons who may be a “Direct Threat” as defined in 49 C.F.R. part 37.3, includes but is not limited to violent or seriously disruptive behavior, uncontrolled body fluids or illegal conduct when using any aspect of RCT’s services will be reviewed and implemented on a case by case basis. The policies that guide such suspension are the same as those for non-disabled transit riders.

n. Lack of Capacity Constraints

RCT shall provide 100 percent of eligible customers’ trip requests. Operational problems attributable to causes beyond the control of RCT (including, but not limited to, weather, safety or traffic conditions affecting all vehicular traffic that were not anticipated at the time a trip was scheduled) shall not be considered a capacity constraint.

RCT does not impose:

- Limits to the number of trips an eligible a customer may request,
- Wait lists for access to service or
- Any operational pattern or practice that significantly limits the availability of service to eligible customers such as (but not limited to):
 - Shortage or drivers or dispatchers
 - Insufficient number of vehicles
 - Prioritization of program participant trips

o. Service Disruptions

When riding RiverCities LIFT, customer conduct will not be accepted nor allowed that is violent, seriously disruptive, or illegal. Persons who demonstrate a willingness to engage in disruptive behavior that delays or prevents the vehicle operator from operating the vehicle in a safe and timely manner may lose their eligibility to use the service for various periods of time. This provision does not apply to unforeseen situations beyond the individual’s control, including behavior symptomatic of an individual’s disability. (e.g., panic attacks) RiverCities LIFT may refuse service to an individual with a disability who engages in violent, seriously disruptive, or illegal conduct, using the same standards for exclusion that would apply to any other person who acted in such an inappropriate way.

RiverCities LIFT will not refuse to provide service to an individual with disabilities solely because the individual's disability results in appearance or involuntary behavior that may offend, annoy, or inconvenience employees of the entity or other persons.

Examples of the violent, seriously disruptive, or illegal conduct resulting in “refusal to provide service” include but are not limited to the following:

- Disrupting the driver while he/she is driving the vehicle.
- Engaging in any conduct or activity that represents a danger to himself/herself, to other passengers or to the driver.
- Making physical or verbal threats to the driver or to other passengers.
- Damaging or destroying vehicle equipment or any employee’s or passenger’s property.
- Getting out of the seat while the vehicle is in motion or while the trip is underway.
- Refusing to wear a seat belt.
- Refusing to disembark.
- Smoking, consuming alcoholic beverages or any illegal substance while on board the RiverCities LIFT vehicle.
- Disrupting other passengers.
- Disrobing.
- Exceeding the four-bag limit.
- Swearing, name calling and/or abusive language.
- Personal Hygiene condition, resulting in a public health hazard.

Any attempt to interfere with the driver or distract the driver while they are operating a vehicle will be considered a service disruption. Passengers are allowed basic verbal communication with a driver as it relates to their trip.

If a service disruption occurs and the nature of the incident is violent, illegal, or presents a safety risk to RiverCities LIFT vehicles, staff, or riders, then RiverCities Transit may classify that rider as a “Direct Threat” and be forced to discontinue service immediately until such a time as RiverCities Transit management can have a discussion with the passenger and/or their legal guardian/caregiver.

RiverCities LIFT shall send a written notice to any passenger who has a service disruption credited to them. This shall be in addition to any verbal notice given. The written notification shall show any incidents that have occurred in the previous 90-day period. In the advent of a suspension of service, the written notice shall include a count of all incidents that have occurred in the last 90-day period and will list out the last three incidents. If service has been previously suspended in the last 90-day period, then any prior suspensions shall be listed out also. The written notices include a request that the passenger contact the RiverCities LIFT Manager if they have information that may explain how the incident(s) that occurred was beyond their control. Passengers may also appeal a suspension of service.

p. Suspension of Service

RiverCities LIFT reserves the right to temporarily suspend a person's eligibility for paratransit service if an excessive number of service disruptions are recorded for that person in a 90-day period.

- If a passenger receives three service disruption incidents within a 90-day period, that individual's paratransit service may be suspended for 7 days.
- If a passenger receives a 4th incident within the same 90-day period, that individual's paratransit service may be suspended for up to 30 days for each offense.
- If a passenger continues to demonstrate a pattern of incidents by having more than five (5) incidents in a 90-day period, that individual will be required to meet with a RiverCities Transit Supervisor before service can be resumed.

When a passenger is suspended from service, their suspension will take effect 14 days after the written notification is mailed. This is to allow a passenger to make personal arrangements before their suspension takes effect.

Any passenger who has had their service suspended may contact RiverCities LIFT Manager to file an appeal of their suspension. The contact information will be in the written notice of suspension. The passenger does not have to appear in person, but can opt to handle the appeal through written means or a phone conversation. They must do so before the suspension takes effect. Any passenger appealing their suspension will continue to have service until their appeal is heard unless their suspension is due to a violent or illegal act.

q. Restoration of Service

Any passenger who has had their service suspended for less than 30 days shall have their service automatically restored upon the completion of the suspension as it is listed in the written notice of their suspension. Any passenger who has had their service suspended for a 30-day period or has had more than five (5) incidents in a 90-day period must contact a RiverCities Transit Supervisor to have their service restored. A staff contact person will be listed in the written notification of their suspension.

The purpose of this contact is to identify any issues or concerns that have caused so many incidents to occur. Staff will work with the passenger to identify solutions or strategies to minimize future incidents. If a passenger who is suspended for 30 days chooses not to contact a RiverCities Transit Supervisor to discuss their suspension, then they are voluntarily choosing not to use RiverCities LIFT, and this is not a denial of service.

V. COMPARISON OF CURRENT PARATRANSIT POLICIES TO ADA REQUIREMENTS

	ADA Requirement	Current Paratransit Policy
Eligibility for Paratransit Service	Persons with disabilities who are unable to access fixed route service for the particular trip being requested due to an impairment related condition.	Individual application with medical verification and in person interview for every applicant.
ADA Service Area	<p>Service is required to origins and destinations within corridors with a width of three-fourths of a mile on each side of each fixed route.</p> <p>Small areas surrounded by corridors must be served.</p> <p>Service is not required outside the boundaries of the jurisdiction(s) in which the transit agency's operates, if it does not have legal authority to operate in that area. This exception applies only when there is a legal bar to the entity providing service on the other side of a boundary.</p>	RiverCities LIFT serves eligible customers living within ¾ miles of the RiverCities Transit's fixed-routes.
Service Hours	<p>Service shall be available throughout the same hours and days as the entity's fixed route service.</p> <p>Corridors do not need to be served with paratransit when the fixed route system is not running in them.</p>	<p>RiverCities LIFT service hours mirror fixed route service, from 6:30 am until 7:00 pm, Monday through Friday and 8:00 am until 6:00 pm on Saturdays.</p> <p>Service is offered to entire service area during those hours, regardless of whether fixed route is running at that time.</p>
Response Time	<p>The entity shall schedule and provide paratransit service in response to a request for service made the previous day.</p> <p>Reservations may be taken by reservation agents or by mechanical means.</p> <p>Reservations will be accepted 24 hours a day. Outside normal business hours, customers may leave their trip request on a voicemail system.</p> <p>The entity may permit advance reservations to be made up to 14 days in advance.</p> <p>The entity may negotiate pickup times with the individual, but not more than one hour before or after the individual's desired departure time.</p>	<p>Reservations will be accepted Monday through Friday, 7:00 a.m. to 5:00 p.m. Reservations will also be accepted via voicemails left on Saturday and Sunday.</p> <p>Reservations may be taken by RiverCities LIFT Dispatch, voicemail or by fax.</p> <p>Trips may be reserved until 5 p.m. the weekday before service or 4 p.m. on Saturdays.</p> <p>Trips may be reserved up to 14 days in advance.</p>

	ADA Requirement	Current Paratransit Policy
Fares	<p>The fare shall not exceed twice the fare that would be charged to an individual paying full fare (i.e., without regard to discounts) for a trip of similar length, at a similar time of day, on the entity's fixed route system.</p> <p>In calculating the full fare the entity may include transfer and premium charges.</p> <p>Companions pay the same fare as the ADA eligible rider.</p> <p>An attendant rides free.</p> <p>A higher fare may be charged to a social service agency or other organization for agency trips (i.e., trips guaranteed to the organization).</p>	<p>RiverCities LIFT fare is identical to fixed route fare.</p> <p>Companions pay the same fare as the ADA eligible rider.</p> <p>Personal Care Attendants ride free.</p> <p>Passengers should specify when making their reservation if they will be accompanied by a Personal Care Attendant or companion to ensure there will be no capacity constraints.</p>
Trip Purpose Restrictions	<p>The entity shall not impose restrictions or priorities based on trip purpose.</p>	<p>RCT will not permit trip purpose restrictions on eligible customers. Passengers who travel between their origin and destination on a daily basis may ride with passengers who travel at the same time interval.</p>
Capacity Constraints	<p>The entity shall not limit the availability of complementary paratransit service to ADA paratransit eligible individuals by any of the following:</p> <ul style="list-style-type: none"> - Restrictions on the number of trips an individual will be provided - Waiting lists for access to the service - Any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons including but not limited to substantial numbers of: <ul style="list-style-type: none"> o significantly untimely pickups for initial or return trips o trip denials o missed trips o trips with excessive trip lengths <p>Operational problems attributable to causes beyond the control of the entity shall not be a basis for determining that a pattern or practice exists.</p> <p>Problems with telephone access would amount to trip denials or a violation of the response time requirement.</p>	<p>RCT will not permit trip limits on eligible customers or impose a wait list for access to the service.</p> <p>RCT reviews trip statistics on a monthly basis.</p>

	ADA Requirement	Current Paratransit Policy
Passenger Assistance Level	Minimum of Curb-to-Curb service standard. Door-to-door service should be provided when requested in a situation that does not provide a safety hazard or other policy violation.	<p>RCT will provide origin-to-destination service to anyone who is eligible for paratransit service. If additional service such as door-to-door is needed it will be evaluated at the time of the application.</p> <p>Due to the shared ride aspect of the service, it is the transit operator's duty to ensure the safety of all passengers using the service; operators must stay within non-interrupted visual range of their vehicle. For example, operators would not be able to accompany a passenger to the second floor of a building.</p>
Same Day Service	Not required	<p>Same day "non-ADA" service may be scheduled at a premium fare of \$15 each way. Will call service may also apply.</p> <p>Will-call service is available and is defined as trips where the pickup time is not prearranged or it is a return trip that is changed less than one hour before pickup.</p> <p>A \$5.00 fare will be charged unless it is a return trip that is rescheduled more than an hour in advance of the scheduled pick up time.</p>

VI. PUBLIC PARTICIPATION AND INFORMATION

a. Efforts to Include Persons with Disabilities in Planning Process

In an effort to include persons with disabilities in the Paratransit planning process, this plan has been presented to RCT's Disability Advisory Committee, consisting of community members with and without disabilities who utilize various forms of transportation within the RCT system. This plan has also been presented and discussed at advertised public meetings. In addition, it is available on RCT's website, office, and transit center. Paratransit customers have been notified via signs on the paratransit vehicles.

b. Availability of the Plan in Accessible Format

The RCT Paratransit Plan is available in alternate formats as requested by an individual.

c. Documentation that Draft Plan was Subject to Public Review and Comment

On May 8th, 2013, a 30-day Public Comment period opened. Copies of all public comments received are included in the July, 2013 Board of Directors meeting packets. During this period, public outreach occurred in several ways.

- Public notices were placed in the following publication: The Daily News
- Handouts were available to customers on both fixed-route and RiverCities LIFT.
- Signs were posted on both all revenue service vehicles in the RCT fleet
- A phone call was made to our point of contact at each high-use facility and an invitation to the public meetings was extended with an explanation of what the meetings were to discuss.
- Presentations were conducted at Longview City Hall on May 21st and June 26th. Presentations were also made at the Kelso City Hall on May 21st and May 23rd.

d. Documentation of Issues Raised by Public and How They Were/Will be Addressed

During the public comment period, RCT received a total of one (1) comment in the following general categories: fares, issues related to in-person interviews and general system issues.....

- i. Fares
None.
- ii. In-Person Interviews
None.
- iii. General Comments
I love it. I have been riding the buses since 1989.

VII. IMPLEMENTATION PLAN

To be compliant with the updated plan, RCT will take the steps outlined below:

RCT will print and distribute the new application to high use facilities or agencies. The new application will be in use no later than August 30, 2013.

RCT will begin interviewing and assessing individuals who apply for paratransit service, but whose determination cannot be made from the paper application alone. Interviewing applicants requires time and planning. Confidential interview space, procedures and trained employees/contractors will be needed to interview all applicants. It is expected that RCT will put into place a system for interviewing and assessing applicants no later than mid-2014.

Developing the Administrative Appeals process will require time and planning for such things as to set up a location and to recruit volunteers for the Appeals Panel. It is expected that RCT will put this system into place no later than December 31, 2013.

All other portions of this Paratransit Plan are currently in practice.

IX. APPENDIX

Table 1 - RCT Fixed-Route Current Service Levels

Route	Morning	Mid-day	Afternoon
31- Highlands	30 minute	60 minute	30 minute
32 - Downtown Longview	30 minute	60 minute	30 minute
33 - West Longview/LCC	60 minute	60 minute	60 minute
44 - Shopper Shuttle	60 minute	60 minute	60 minute
45 - Longview/Kelso	40 minute	40 minute	40 minute
56 - Kelso Loop clockwise	60 minute	60 minute	60 minute
57 - Kelso Loop CCW	60 minute	60 minute	60 minute

Table 2 - Paratransit Vehicle Fleet

Vehicle No.	Make	Model	Seating Capacity	Wheelchair Capacity	Lift	Lift/Ramp Capacity
42-33	Ford	Eldorado	17	3	Yes	650 pounds
42-34	Ford	Eldorado	16	3	Yes	650 pounds
42-35	Ford	Eldorado	15	3	Yes	650 pounds
42-36	Ford	Eldorado	15	3	Yes	650 pounds
42-37	Ford	Eldorado	15	3	Yes	650 pounds
42-38	Ford	Eldorado	15	3	Yes	650 pounds
42-39	Ford	Eldorado	15	3	Yes	650 pounds
42-40	Ford	Eldorado	15	3	Yes	650 pounds
42-41	Ford	Eldorado	15	3	Yes	650 pounds
42-42	Ford	Eldorado	15	3	Yes	650 pounds
42-43	Dodge	Caravan	3	1	No	XX pounds
42-44	Ford	Eldorado	13	3	Yes	650 pounds
42-45	Ford	Eldorado	13	3	Yes	650 pounds
42-46	Ford	Eldorado	13	3	Yes	650 pounds
42-47	Ford	Eldorado	13	3	Yes	650 pounds
42-48	On	Order				
42-49	On	Order				
42-50	Order	Mid-2013				
42-51	Order	Mid-2013				

Administrative Appeal Process

Requesting an Appeal

Appeals must be requested in writing within sixty (60) days of the date that the decision being appealed was mailed from RCT. The individual shall inform RiverCities Transit of any special accommodations needed (e.g., interrupter, TTY, etc). Appeals may be mailed or faxed to:

RiverCities Transit
ATTN: Mobility Supervisor
254 Oregon Way
Longview, WA Fax:
360-442-5979

RCT staff is responsible for receiving requests for appeals of service suspensions or eligibility denials. RCT staff will ask the requesting individual if they desire an in-person hearing. The Appeals Panel will be promptly advised of a request for an appeal hearing, shall coordinate an appeal date and time with the individual, and shall reserve sufficient time for the hearing. RCT staff shall notify the individual in writing of the date, time and location of the appeal hearing. If necessary, staff shall arrange for the individual to receive RiverCities LIFT transportation to and from the place of hearing. RCT will make every effort to schedule the Appeal Hearing within two (2) weeks of the request. Individuals needing special accommodations may request so at time of request for hearing.

The Administrative Appeals committee will be comprised of representatives from the medical or social services community, persons with disabilities or public agency staff not associated with the original eligibility determination process. Service on this committee is voluntary and membership of this committee may change without notice.

Prior to Hearing

Individuals may request copies of documents and information relating to the decision. The Appeals Panel or its designee shall promptly consider and decide all requests for documents and information. Documents and information shall be provided if the documents or information are relevant to the decision being appealed or are likely to assist the Appeals Panel in deciding the appeal. The individual may bring another person to support their case to the hearing.

The individual may decline the hearing at any time by calling RCT prior to the hearing date.

At Hearing

Individuals may represent themselves at the hearing, or may be represented by another person designated by the individual to present the case.

The parties may present documents and offer other oral, written or recorded information to support their respective positions or to respond to each other's position. RCT shall present its position first, then the individual may present next. As required or appropriate, the parties shall be permitted to present additional documents and information.

The Appeals Panel may continue a hearing or permit the post-hearing submission of additional evidence, information and arguments. If a continuance or post-hearing submission is permitted, the Appeals Panel shall promptly advise the parties of the date, time and location of the continued hearing or the date by which the post-hearing submission must be received by the Appeals Panel. The hearing shall be recorded.

Appeal without a Hearing

If the individual declines an in-person appeal hearing, RCT staff shall inform the individual of the date by which they must submit to RCT any written materials the individual wishes the Appeals Panel to consider in determining their appeal. Extensions of this date may be allowed.

Following the submission date, the Appeals Panel shall review the individual's file and written submissions, if any, and decide the matter. The Appeals Panel may uphold the eligibility determination or service suspension, overturn the eligibility determination or service suspension, modify the eligibility determination or service suspension, impose conditions upon eligibility or returning the individual to service, or take any appropriate action to decide the matter.

Evidentiary Burden and Standard

RCT shall have the burden of demonstrating that the individual's eligibility for paratransit service was appropriately determined or that the individual's service was suspended for appropriate cause and in accordance with the procedures for service suspension. This burden must be satisfied by a preponderance of all the information submitted in connection with the appeal or otherwise in the individual's record. The standard of admissibility for information presented in connection with an appeal shall be whether the information is of the type that a reasonable person would rely upon in making decisions about their personal affairs.

Notification of Decision

The Appeals Panel shall notify the individual of its decision and the reasons for its decision in writing by mail, within thirty (30) days of the date of the appeal hearing or, if the individual declined hearing, of the date on which the Appeals Panel reviewed and considered the matter. The letter will be in accessible format as necessary and will detail any reasons for a continued reason of ineligibility.

If no decision is made on an appeal of eligibility determination within thirty (30) days of the date of the appeal hearing or date of appeals panel consideration, the individual will be eligible for RiverCities LIFT service as of the 31st day, until and unless a decision to deny the appeal is rendered by the Appeal Panel.

Eligibility Application