



Hood River County Transportation District

# ADA and Paratransit Policy

Revision Date: April 17, 2024

## **Americans with Disabilities Act (ADA) Information**

Hood River County Transportation District is committed to providing equal access to its facilities, programs, and services for persons with disabilities. This material can be made available in an alternate format by emailing ADA Coordinator at [info@ridecatbus.org](mailto:info@ridecatbus.org) or by calling 541-386-4202. People who are deaf or hard of hearing may make a request by calling the Oregon Relay Service at 800-735-2900.

## **Title VI Notice to the Public**

In compliance with US Department of Transportation Title VI regulations (49 CFR part 21), CAT operates programs without regard to race, color, and national origin. Contact Hood River County Transportation District at 224 Wasco Loop, Hood River, OR 97031, (541) 386-4202 or email [info@ridecatbus.org](mailto:info@ridecatbus.org) to request additional information regarding CAT non-discrimination obligations.

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## Change log

Date	Section	Description
April 2024		New Policy Document

## Acronyms and abbreviations

ADA Americans with Disabilities Act

WLAD Washington's Law Against Discrimination

## Definitions

The following definitions from 49 CFR 37, the [National RTAP ADA Toolkit Glossary](#), and [FTA ADA Circular 4710.1](#) may be useful while using this policy:

- **Commuter bus service:** Fixed route bus service characterized by service predominantly in one direction during peak periods, limited stops, use of multi-ride tickets, and routes of extended length, usually between the central business district and outlying suburbs. Commuter bus service may also include other service, characterized by a limited route structure, limited stops, and a coordinated relationship to another mode of transportation.
- **Disability:** With respect to an individual, a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment.
- **Fixed Route Service:** System of transporting individuals which operates along a prescribed route according to a fixed (regular) schedule.
- **Mobility Device or Aid:** A device designed to assist an individual with disabilities with locomotion. Examples include wheelchairs, canes, crutches, and walkers.
- **Deviated Fixed Route Service:** Transit service that operates along established routes that typically have designated stops. Between these stops, vehicles deviate (depart) from an established route to pick up or drop off riders within a defined off-route service area.
- **Securement Area or Station:** On a vehicle, a designated location for riders using wheelchairs, equipped with a securement system.
- **Securement Device, Equipment or System:** On a vehicle, equipment used for securing a wheelchair against uncontrolled movement during transport.
- **Service Animal:** Any guide dog, signal dog, or other animal individually trained to work or perform tasks for an individual with a disability, including, but not limited to, guiding individuals with impaired vision, alerting individuals with impaired hearing to intruders or sounds, providing minimal protection or rescue work, pulling a wheelchair, or fetching dropped items.
- **Wheelchair:** A mobility aid belonging to any class of three- or more- wheeled devices, usable indoors, designed or modified for and used by individuals with mobility impairments, whether operated manually or powered.

## ADA policy introduction

Hood River County Transportation District (HRCTD), which does business as Columbia Area Transit - CAT is committed to compliance with Section 504 of the Rehabilitation Act of 1973, as amended; Americans with Disabilities Act (ADA), signed into law on July 26, 1990; and applicable State of Oregon and State of Washington laws.

These civil rights legislations prohibit discrimination based on disability and require transportation service options be provided to persons with disabilities comparable to those available to people without disabilities.

It is the policy of HRCTD that, when viewed in its entirety, services, programs, facilities, and communications provided by HRCTD, directly or by a contracted service provider, are readily accessible to and usable by individuals with disabilities to the maximum extent possible.

New construction and facility alterations completed by HRCTD will be ADA compliant. If full ADA compliance is unfeasible due to structural impracticability, facility alterations will be ADA compliant to the maximum extent feasible. For information on upcoming projects and an opportunity to comment on plans, please visit our website ([www.ridecatbus.org](http://www.ridecatbus.org)) or contact our ADA Coordinator at [info@ridecatbus.org](mailto:info@ridecatbus.org).

HRCTD provides ADA related training to staff every two years and as-needed basis to ensure staff are trained to proficiency, as appropriate to their duties, so they operate vehicles and equipment safely and properly assist and treat people with disabilities in a respectful and courteous way.

### 1. Fares

See HRCTD's website ([www.ridecatbus.org/buy-fares/](http://www.ridecatbus.org/buy-fares/)) for current fares.

HRCTD's fixed route and ADA complementary paratransit fare structure as of publication:

- Fixed route:
  - Adult (Local): \$1.00
  - Adult (Columbia Gorge Express): \$10.00
  - Adult (Gorge-to-Mountain Express): \$5.00
  - Reduced fares:
    - Youth (defined as 10 and under): free
  - Monthly pass: \$40.00
- ADA complementary paratransit trip:
  - Adult: \$2.00
  - Monthly pass: \$80.00

If a passenger cannot physically pay the fare by the established means, HRCTD staff will grant the passenger's request to handle the fare while assisting with payment. HRCTD staff are not required to reach into customer pockets, backpacks, or other personal belongings to extract the fare.

Personal care attendants may travel on HRCTD ADA complementary paratransit services or HRCTD Dial-A-Ride service at no cost when accompanying a person with a disability. Personal care attendants must pay the applicable fare when riding fixed route services. Personal care attendants must board and disembark at the same locations as the ADA complementary paratransit rider.



Companion or guests pay the applicable fare for those individuals on fixed route services and general public demand responsive services. Companion or guests pay the same fare as the paratransit-eligible passenger on ADA complementary paratransit services. Companions or guests are not the same as personal care attendants.

For more information about personal care attendants and companions or guests, see [5. Personal care attendants](#) and [12. ADA complementary paratransit services](#).

## 2. Approved mobility devices

HRCTD can accommodate mobility devices that meet the following definitions and minimum standards:

- A wheelchair is a mobility aid belonging to any class of three- or more-wheeled devices; that is usable indoors; and is designed or modified for and used by individuals with mobility impairments, whether manually or power operated.
- A mobility device is equipment designed or intended to assist people with mobility disabilities (i.e., walkers, canes, braces, crutches).
  - HRCTD may not be able to accommodate equipment that is not primarily designed for use by people with mobility impairments (i.e., shopping carts, skateboards).
  - Mobility devices must be stored out of the path of travel for other passengers.

HRCTD will transport riders with their mobility devices, unless:

- Doing so is inconsistent with safety requirements in this policy or by the vehicle's manufacturer specifications (e.g., the combined weight of the wheelchair and occupant exceeds that of the vehicle's lift specifications).
- The use of the mobility devices poses a direct threat. For more information, see [11. Denial of service](#).

It should be noted that FTA's definition of a wheelchair does not require specific elements or equipment such as front rigging (i.e., footplates, leg rests); wheel locks or brakes; push handles; or positioning belts or harnesses. Per FTA Circular 4710.1, and HRCTD cannot require wheelchairs to be equipped with specific features in order to be transported or allowing for the denial of service because of the perceived condition of a passenger's mobility device is not permitted under § 37.165(b) and would be a discriminatory policy prohibited by § 37.5(a).

For more information, see 49 CFR 37.3, 37.165, and Appendix D and FTA Circular 4710.1, chapter 2.4.1).

## 3. Mobility device securement

Operators will do the following when securing mobility devices:

- Use front and rear tie-downs.
- Secure mobility devices at the strongest parts of the device. However, the passenger can indicate the most optimal tie-down spot.
- Secure the mobility device front-facing unless the manufacturer specifications of the securement system requires otherwise or if otherwise requested by the passenger.
- Assist riders with securement systems, ramps, and seatbelts. The adjustable lap/shoulder seatbelt is for convenience and comfort and is optional not mandatory.

HRCTD does not require but recommends that riders apply brakes on their mobility devices when on a lift or in securement areas. For power chairs or scooters, HRCTD recommends riders turn the power switch to the “off” position on lifts or in securement areas. Operators cannot assist riders using power chairs or scooters with the operation of their equipment.

HRCTD requires that passengers in mobility devices ride with their devices secured while in the vehicle. All mobility devices must be secured to the floor of HRCTD vehicles during transportation. Passengers who do not comply with this policy may be denied transportation, as allowed under the ADA 49 CFR Part 38. Section 37.165(c)(3) of the DOT ADA regulations. This policy applies to all mobility devices HRCTD is able to secure. It does not apply to those devices that cannot be secured. If tie-down equipment does not fit or is broken, the passenger will be allowed to ride.

HRCTD operators must verify that all mobility devices are secured while the vehicle is in motion, except as stated earlier. The operator must secure the mobility device or must ensure proper securement if it is performed by the passenger or personal care attendant (PCA).

HRCTD recommends, but does not require, that the mobility device user utilize lap and/or shoulder belts available on all buses. The operator will assist with lap and shoulder seatbelt if desired.

All HRCTD vehicles accommodate wheelchairs, scooters, and similar mobility devices up to 30 inches wide & 48 inches long (based on the available space on the vehicle).

The mobility device and passenger together must not exceed the weight limits of the lift or the ramp which is set at 600 pounds. Mobility devices exceeding these limits may be denied access if they create any safety, maneuverability or mechanical problems.

For their safety, passengers using three-wheeled scooters are strongly encouraged, but not required, to transfer to a regular bus seat whenever possible, as recommended by most scooter manufacturers. The scooter will then be secured in the wheelchair securement area.

The marking and tether strap program is voluntary, and wheelchairs without markings or straps will be secured to the best of the ability of HRCTD operators.

HRCTD will not refuse to transport someone whose mobility device cannot be satisfactorily restrained as long as the mobility device fits within the definitions in [2. Approved mobility devices](#).

#### **4. Portable oxygen equipment**

HRCTD allows riders to travel with respirators and portable oxygen supplies, consistent with applicable U.S. Department of Transportation rules on the transportation of hazardous materials in [49 CFR Subtitle B, Chapter 1, Subchapter C](#). Riders must secure portable oxygen equipment safely and the equipment must not obstruct the aisle.

#### **5. Personal care attendants**

A personal care attendant is someone who travels with and assists a rider with their personal needs due to a disability. HRCTD cannot require personal care attendants. However, if used, customers must provide their own personal care attendant.

A personal care attendant differs from a companion or guest. A guest or companion is anyone who accompanies the rider who is not designated as their personal care attendant.

Operators cannot provide attendant services, such as assisting a rider with use of oxygen, medical equipment, administering medication, or other personal needs. Riders who require attendant services should travel with a personal care attendant.

For information on fares for personal care attendants, guests, and companions, see [1. Fares](#). For information on scheduling ADA complementary paratransit rides with personal care attendants, guests, and companions, see [12. ADA complementary paratransit services](#).

## 6. Service animals

A service animal is any guide dog, signal dog, miniature horse, or other animal individually trained to work or perform tasks for a person with a disability. HRCTD allows service animals to accompany people with disabilities in all organization vehicles and facilities. Riders may use more than one service animal.

HRCTD does not charge a fare for service animals. If a service animal causes damage to HRCTD vehicles or facilities, the user of the service animal may be charged for those damages.

To ride HRCTD services, service animals:

- Must be on a leash, tether, or harness unless use of such a device would interfere with the task the service animal performs, or the person's disability prevents use of such devices. In these cases, the handler must use voice, signal, or other effective means to maintain control of the service animal.
- Must not be aggressive toward or pose a direct threat to the health or safety of HRCTD staff, other riders, or other animals.
- Must be potty-trained.
- Must remain at the rider's feet or on the rider's lap. The animal may not sit on a vehicle seat.

HRCTD staff will not request written certification that a rider's animal is a service animal or request demonstration of service animal's task(s). However, HRCTD staff may ask users of service animals the following questions:

- Is your animal a service animal?
- Is the service animal required because of a disability?
- What work or task has the animal been trained to perform?

HRCTD may deny a service animal service if the animal is out of control of the handler, posing a direct threat, not potty-trained, or if its handler refuses to answer the questions about the animal noted above.

If HRCTD denies the service animal service, the handler/person with a disability may still use HRCTD services. HRCTD staff will provide the handler/person with a disability information on how to appeal the service animal's service denial and, if applicable, options to remedy the situation so the service animal can be allowed to use HRCTD vehicles and facilities.

HRCTD staff will not take charge of riders' service animals. Riders are welcome to use a personal care attendant or companion to assist with caring for a service animal.

Federal and state law do not consider emotional support animals and service animals-in-training "service animals." Refer to HRCTD's rider's guide for policies about emotional support animals, service animals-in-training, and pets accessing HRCTD vehicles and facilities.

## 7. Boarding assistance

HRCTD operators will position the vehicle to make boarding and disembarking as easy as possible for everyone, minimize the slope of the ramp, and use the vehicle's kneeling option as needed. Operators will allow riders with disabilities adequate time to board and disembark the vehicle.

Operators will use vehicle accessibility equipment to assist customers (i.e., vehicle annunciators, lifts/ramps). For information on procedures when vehicle accessibility equipment is not functioning, see [8. Maintenance of lifts or ramps](#).

When necessary or upon request, operators will provide riders assistance using lifts, ramps, and securement systems. Upon request by the rider, operators may assist riders using manual wheelchairs up vehicle ramps if doing so does not constitute a direct threat to the health or safety of the operator. For more information, see [11. Denial of service](#).

Riders using wheelchairs may board the vehicle lift separately from their wheelchair. Riders may use the vehicle lift facing toward or away from the vehicle. HRCTD does not require operators to assume the controls of a power wheelchair or assist a passenger in/out of their wheelchair. Riders are welcome to ride with a personal care attendant to accomplish these tasks. For more information, see [5. Personal care attendants](#).

## 8. Maintenance of lifts or ramps

HRCTD will use and maintain vehicle and facility accessibility features and repair malfunctioning features promptly.

When an operator discovers a vehicle's lift/ramp is out of order, the operator will report it immediately to the on-duty Field Supervisor.

HRCTD will take the following steps for services with malfunctioning features:

- HRCTD will remove fixed route vehicles with inoperable lifts/ramps from service as soon as possible and no later than before the vehicle's next service day. If a fixed route vehicle is operating with an inoperable lift/ramp and a rider requires the lift/ramp and if the next vehicle on the route is not scheduled to arrive at the stop for over 30 minutes, HRCTD will dispatch alternative transportation immediately to transport that rider.
- Demand responsive service vehicles with an inoperable lift/ramp may remain in service for the remainder of the day if HRCTD can assign riders requiring this accessibility equipment to another vehicle.
- All vehicles found to have an inoperable lift/ramp will not be returned to service until the lift/ramp is repaired, with the FTA-permitted exception of the following: if HRCTD does not have a spare vehicle to replace the vehicle with an inoperable lift/ramp, HRCTD may return the vehicle to service temporarily, for a maximum of 3 days while making preparations to repair the lift/ramp.

HRCTD will work with riders who require reasonable modifications due to an accessibility feature being out of order. See the [14. Reasonable modification](#) for information on making these requests.

Riders who notice accessibility features that are not in working order are obstructed should notify the vehicle operator immediately or call HRCTD customer service at 541-386-4202.

## 9. Priority/reserved seating

All HRCTD fixed route vehicles contain signage designating priority/reserved seating at the front of

the vehicle for older adults and people with disabilities and at all wheelchair securement locations. The signage instructs riders to comply with the operator's request to make these seats available to older adults and people with disabilities who prefer to use them.

HRCTD drivers will allow riders using mobility aids to board if securement areas are not otherwise occupied by a mobility device, regardless of the number of riders on the vehicle. Operators will ask other riders sitting in priority and reserved seating areas to move to other available seats or stand. Vehicle operators may ask ambulatory people with a disability to vacate a wheelchair securement site seat. Operators cannot enforce the priority and reserved seating designation beyond making the request.

## 10. Stop announcements

HRCTD's fixed route services will make on-board announcements at all stops and announce transfer points with other fixed routes and destination points.

## 11. Denial of service

HRCTD may deny, suspend, or exclude any rider from its facilities and/or services for engaging in conduct that is violent, seriously disruptive, illegal, considered a "direct threat" to others, or for other behaviors/actions as described in HRCTD's Rules of the Road - Rider Code of Conduct policy.

A direct threat is a significant risk to the health or safety of others that cannot be eliminated by a reasonable modification to HRCTD's policies, practices, procedures, or by the provision of auxiliary aides or services, such as traveling with a personal care attendant. A direct threat does not occur when a person's disability results in an appearance or involuntary behavior that may offend, annoy, or inconvenience others.

Riders suspended or excluded from HRCTD's property and/or services may request an appeal of this decision by contacting HRCTD. See [13. Complaint process](#) for HRCTD's contact information.

## 12. ADA complementary paratransit services

HRCTD offers ADA complementary demand response, comingled demand response, and/or deviated fixed route services. Comingled demand response and deviated fixed route services are available upon request by ADA complementary paratransit eligible individuals and/or the general public. This section provides details on HRCTD's ADA complementary paratransit services.

Any route deviations for ADA complementary paratransit demand response, comingled demand response (Dial-A-Ride), and/or deviated fixed route services must be requested at least a day in advance. Customers must call 541-386-4202 to request a deviation.

**ADA complementary paratransit** services may only be requested by approved HRCTD ADA complementary transit riders or visiting riders who have been approved by their local transit agencies. ADA complementary paratransit services are available for approved riders to origins and destinations within  $\frac{3}{4}$  of a mile of local fixed route services during service operating hours.

Paratransit trip requests are taken Monday-Friday from 8:00 a.m. to 5:00 p.m. For next-day service on Saturday or Sunday, please call on Friday by 5:00 p.m. All requested paratransit trips received after hours can be left on voicemail and the rider will be notified the following morning whether the ride can be accommodated or negotiated. Trip reservations can be made up to 14 days in advance. At the time of reservation the rider should inform HRCTD if they will be traveling with a mobility device, service animal or personal care attendant.

### 12.1. Eligibility requirements

People with a disability or disabling health condition that prevents them from independently using HRCTD fixed route buses some or all of the time may access HRCTD paratransit.

Presence of a disability or a disabling health condition by itself does not automatically make a person eligible for paratransit service. The ability to use HRCTD services is the basis for eligibility.

HRCTD will review applications for paratransit eligibility based on the following qualifications.

People are eligible for HRCTD’s paratransit service if they:

- Are unable to board, ride, or exit a ramp/lift-equipped bus without assistance.

**OR**

- Need to use a ramp/lift but it cannot be deployed safely at their bus stop.

**OR**

- Have a disability that prevents travel to and from their bus stop under certain conditions.

**AND**

- Are certified to use HRCTD paratransit.

HRCTD will respond to paratransit eligibility applicants in writing. If the applicant does not receive an eligibility answer within 21 days of submitting a completed application, HRCTD will treat the applicant as eligible and provide paratransit services until the organization makes a final eligibility determination.

### 12.2. Categories of eligibility

HRCTD will classify an applicant's paratransit eligibility as conditional, unconditional, or temporary. The table below shows descriptions of eligibility types and circumstances for eligibility types.

<b>Eligibility Type</b>	<b>Circumstances</b>	<b>Description</b>
Unconditional	A person with a disability who cannot independently ride fixed route transit.	Permitted to make all trips using paratransit.
Conditional	Including, but not limited to, a person prevented from riding fixed route transit by: <ul style="list-style-type: none"> <li>• Disability or combination of disability and architectural/path-of-travel barriers from getting to/from the boarding area.</li> </ul> Specific inaccessible routes or stops.	Eligible to use paratransit for some trips, but not all.
Temporary (unconditional or conditional)	A person is prevented from using all or some, fixed routes or stops during a certain amount of time.	Temporary eligibility to use paratransit based on circumstances.

### 12.3. Eligibility application process

Applicants may obtain a paratransit eligibility application online at [www.ridecatbus.org](http://www.ridecatbus.org) or by calling HRCTD at 541-386-4202 to request that a paper application be mailed or emailed. Any questions regarding the application process should be directed towards the HRCTD ADA coordinator at 541-386-4202 or [info@catransit.org](mailto:info@catransit.org).

HRCTD requires that the completed application, signed applicant agreement/release and a Healthcare Professional Verification of Eligibility be submitted by email to [info@catransit.org](mailto:info@catransit.org) or mailed to:

ADA Coordinator  
Columbia Area Transit  
224 Wasco Loop  
Hood River, OR 97031

Once a completed application is received it will be reviewed and an eligibility decision will be made within 21 days. If a decision has not been made by the 21<sup>st</sup> day HRCTD will honor ADA paratransit status until a determination can be made.

If the paratransit eligibility application is approved HRCTD requires that the status must be recertified on an annual basis.

Applicants may appeal the denial or conditional decision by submitting a request in writing, sixty (60) days within receipt of the denial letter to:

Executive Director  
Columbia Area Transit  
224 Wasco Loop  
Hood River, OR 97031

The Executive Director's appeal decision will be sent to the applicant within thirty (30) days of the submittal of the denial.

#### **12.4. Service area**

HRCTD provides paratransit within 3/4 miles of local fixed route service. The map below shows the service area for the ADA paratransit program. This is also HRCTD's Dial-A-Ride service area.



HRCTD does not provide ADA complementary paratransit service along commuter routes. “Commuter routes” are defined by the Federal Transit Administration and the Code of Federal Regulations as routes “characterized by service predominantly in one direction during peak periods, limited stops, use of multi-ride tickets, and routes of extended length, usually between the central business district and outlying suburbs.” It may also include routes with a “coordinated relationship to another mode of transportation.” HRCTD’s commuter routes include the Columbia Gorge Express, Gorge-to-Mountain, and the Dog Mountain Shuttle.

### 12.5. Origin-to-destination service

ADA complementary paratransit trips are a “origin-to-destination” service. They can take one of two forms, described in the table below:

Trip type	Descriptions
Curb to curb	Service takes rider from curb of pickup location to curb of destination.
Door to door	Service takes rider from door of pickup location to door of destination.

HRCTD provides curb-to-curb service. If a rider requires door-to-door service, the rider must request this service at the time of reservation and only eligible for ADA paratransit trips.

HRCTD will review requests on a case-by-case basis.

If a rider makes a curb-to-curb reservation, but at the time of service an otherwise unknown barrier is discovered and the rider requires additional assistance, the rider may request door-to-door assistance from the driver.

HRCTD cannot take actions that would fundamentally alter the nature of its service or create undue burdens.



For more information, [5. Personal care attendants](#), [7. Boarding assistance](#), and [14. Reasonable modification](#).

#### **12.6. Days and hours of operation**

HRCTD's ADA complementary paratransit is available on the same days and hours as HRCTD's local fixed route services. Holiday operating days and hours for ADA complementary paratransit are the same as fixed route service.

#### **12.7. Trip purpose**

HRCTD provides ADA paratransit service for trips of any purpose and does not prioritize or deny specific types of trips.

#### **12.8. Trip scheduling**

Riders may request a paratransit trip in-person, by phone, or voicemail.

Paratransit trip requests are taken Monday-Friday from 8:00 a.m. to 5:00 p.m. For next day service on Saturday or Sunday, please call on Friday by 5:00 p.m. All requested paratransit trips received after hours can be left on voicemail and the rider will be notified the following morning whether the ride can be accommodated or if it needs to be negotiated. Riders should call 541-386-4202 with any questions they may have.

Depending on schedule availability HRCTD may negotiate a trip within 1 hour before or after the ADA paratransit rider desired departure time. HRCTD will pick up the ADA paratransit rider within -15/+15 minutes the negotiated pickup time.

HRCTD will not accept trip reservations made the day of the trip. Rides must be scheduled at a minimum, on the day prior to the requested trip. Trip reservations can be made up to 14 days in advance. At the time of reservation the rider should inform HRCTD if they will be traveling with a mobility device, service animal or personal care attendant.

Any trip denials made by HRCTD will be documented and used to ensure resources are allocated appropriately to reduce amount of trip denials.

#### **12.9. Companions and personal care attendants on ADA complementary paratransit services**

When arranging for a trip on ADA complementary paratransit services, riders should notify the HRCTD scheduler if they are traveling with a personal care attendant.

Additionally, HRCTD will accommodate one non-personal care attendant companion in addition to a personal care attendant if the rider notifies the scheduler of the companion when arranging the trip. HRCTD will accommodate additional non-personal care attendant companions on a space-available basis.

See [1. Fares](#) and [5. Personal care attendants](#) for fares and general information for personal care attendants and guests/companions.

#### **12.10. Visitor certification**

Visitors are people with disabilities who live outside Hood River County and would like to use HRCTD ADA complementary paratransit. Visitors are eligible for a total of 21 days (does not have to be concurrent) of paratransit service in a 365-day period beginning the first day the visitor uses the service. For additional days of service, visitors must apply for ADA complementary paratransit service with HRCTD.

HRCTD will certify a visitor using the following process:

ADA paratransit rider will send the HRCTD ADA coordinator documentation of ADA paratransit eligibility from another transit agency or proof that they are a visitor and disability if not apparent. Documentation may be sent by email to [info@catransit.org](mailto:info@catransit.org) or mailed to:

ADA Coordinator  
Columbia Area Transit  
224 Wasco Loop  
Hood River, OR 97031

HRCTD ADA coordinator will send an email or letter (if requested) to rider confirming the eligibility to use HRCTD ADA paratransit services for a total of 21 days within 365 days.

### **12.11. Trip denials**

HRCTD will try to meet all requests for ADA complementary paratransit service.

If HRCTD cannot schedule or negotiate a requested trip within one hour before or after the requested trip, this constitutes a trip denial, even if the rider accepts a trip that is beyond the negotiated window. HRCTD will document trip denials of ADA paratransit riders and will monitor trip denials and missed trips to ensure ADA complementary paratransit service capacity is adequate.

### **12.12. No-show/late-cancellation policy**

HRCTD may suspend riders who “establish a pattern or practice of missing scheduled trips” after providing a rider due process. A “pattern or practice” involves “intentional, repeated or regular actions, not isolated, accidental, or singular incidents.”

HRCTD may count late cancellations as no-shows for trips canceled less than one hour prior to the scheduled pick-up time. No-shows or late cancellations for reasons that are beyond the rider’s control will not be counted. Within a 30-day period, three (3) or more no-shows/late cancellations that also represent at least 50 percent of scheduled trips will be grounds for temporary suspension of service.

HRCTD cannot impose a mandatory financial penalty, including charging for the fare for the no-show trip.

The duration of the suspension will be for a reasonable period of time but will not be longer than 30 days. Rider will receive a written Notice of Suspension, citing which trips were no-shows and/or late cancellations and the date of proposed suspended service. Additionally, the written notice will inform riders facing suspension that they have the right to appeal the proposed suspension (with an option for an in-person appeal).

HRCTD riders have the right to appeal the notice of no-show or suspension. Appeals must be sent in writing to the ADA Coordinator at 224 Wasco Loop, Hood River, OR 97031 within 14 days of the notice date.

Step 1: Please provide your response in writing, including a copy of the notice submitted to you. The appeal should state the reason you believe the no-show/late cancellation notice or suspension is invalid.

Step 2: Upon receipt of the request for appeal, the ADA Eligibility Coordinator will determine whether the no-show/late cancellation penalty or suspension should be withdrawn. The coordinator’s investigation and decision will consider the rider’s trends and patterns, medical

emergencies, or situations outside the rider's or caregiver's control.

Step 3: If you are not satisfied with the ADA Eligibility Coordinator's investigation or decision, you may request a meeting with CAT's Executive Director or their designee to review your concerns. A suspension will not occur until all appeal remedies that you have requested have been exhausted.

The Executive Director shall report all suspensions to the Board of Directors at the next following Board meeting.

### **13.Complaint process**

HRCTD is committed to providing safe, reliable, and accessible transportation services and welcomes customer feedback. ADA complaints and questions about HRCTD's ADA complaint process may be submitted to HRCTD's ADA Coordinator using the following methods:

- Email: [info@catransit.org](mailto:info@catransit.org)
- Call: 541-386-4202
- Send mail to: ADA Coordinator, Columbia Area Transit, 224 Wasco Loop, Hood River OR 97031
- Online: A link is provided on this webpage <https://www.ridecatbus.org/civil-rights/#ADA/Accessibility>

HRCTD will respond promptly to all complaints that have valid contact information. Official HRCTD Title VI or ADA complaint paper or online form should be used if submitting an official complaint.

HRCTD will retain copies of complaints, investigation and resolution documentation; and HRCTD's response to the complainant in accordance with the complaint record retention requirements of the ADA, Washington State Archives Office, Washington State Department of Transportation Consolidated Grant Program, and ODOT.

To share information about its ADA complaint process, HRCTD will use the same means it uses to inform the general public about its policies and procedures. This includes through the organization's website.

### **14.Reasonable modification**

Requests for modifications of HRCTD policies, practices, or procedures to accommodate a person with a disability may be made either in advance or at the time of service. HRCTD is best able to address and accommodate requests when made in advance.

Advance requests for reasonable modifications may be made to HRCTD by emailing [info@catransit.org](mailto:info@catransit.org) or calling 541-386-4202. The request should contain an explanation of the modification needed.

For requests at the time of service, HRCTD operators will determine if the modification can be provided. Operators may consult with HRCTD management before deciding to grant or deny the request.

HRCTD will only deny requests based on one or more of the following:

- Granting the request would fundamentally alter the nature of HRCTD's services, programs, or activities.
- Granting the request would create a direct threat to the health or safety of others.

- Without the requested modification, the person with a disability can fully use HRCTD's services, programs, or activities for their intended purpose.

When HRCTD denies a request for a reasonable modification, the organization will take other actions to ensure that the person with a disability receives the services provided by HRCTD, to the maximum extent possible.

HRCTD commits to sharing information with the public about its ADA reasonable modification request procedures using the same means used to inform the public about other organization policies and procedures, including on the organization's website.