



American Disabilities Act (ADA) Corrective Action Plan

April 30, 2026



Introduction

The purpose of this Americans with Disabilities Act (ADA) Corrective Action Plan is to summarize actions completed to date and outline ongoing efforts to achieve and maintain full ADA compliance. The ADA is a civil rights law that ensures equal opportunity for individuals with disabilities and prohibits discrimination across key areas of public life, including employment, public accommodations, government services, public transportation, and telecommunications.

Title II of the ADA requires public entities to evaluate their services, policies, and practices and to ensure that all programs, services, and activities are readily accessible to and usable by individuals with disabilities.

Pacific Transit System (PTS) has initiated a comprehensive evaluation of its services, policies, practices, programs, and activities to identify and address any barriers to access for individuals with disabilities. This effort is in direct response to the Washington State Department of Transportation (WSDOT) Fact Finding Report issued on December 23, 2025.

As part of this corrective process, PTS is undertaking the following actions:

- Implementing comprehensive ADA training for dispatch, operations, and supervisory staff;
- Reforming dispatch and scheduling practices to ensure ADA-compliant decision-making;
- Establishing clear, documented procedures for ADA eligibility determinations, service limitations, reasonable modifications, and safety-related decisions;
- Enhancing transparency by promoting and enforcing ADA policies and procedures through both public-facing platforms and internal operations; and
- Adopting and consistently applying ADA complaint-handling procedures in accordance with 49 CFR §27.13 and 49 CFR Part 37, including timely investigations, written responses, documented findings, and appropriate corrective actions.



Next Steps

The Washington State Department of Transportation (WSDOT) will take the following actions to ensure ongoing compliance and oversight:

- Review the Corrective Action Plan within 30 days of the April 30, 2026 submission deadline;
- Schedule a follow-up compliance meeting with Pacific Transit leadership and Board members;
- Monitor implementation of the Corrective Action Plan over a period of 6 to 12 months; and
- Refer the matter to the Federal Transit Administration (FTA) if identified deficiencies are not adequately addressed.



ADA Corrective Action Plan Progress

- 1. Eliminate Capacity Constraints: Discontinue all trip caps, ride limitations, service freezes, or prioritization of general public rides over ADA trips.**

Agency Response:

Pacific Transit System (PTS) has implemented new software and operational procedures to ensure that trip caps, trip-purpose denials, and prioritization of non-ADA riders over ADA-eligible riders do not occur.

ADA paratransit is a shared-ride service for individuals with disabilities, and it is **not** restricted by trip purpose. Eligible riders can use it for any reason provided the ride is within 3/4 of a mile of a fixed bus route during regular service hours.

Through the ADA Corrective Action Plan process, PTS identified that ADA paratransit service had become operationally commingled with general Dial-a-Ride microtransit services. While this approach created certain efficiencies, it also introduced challenges in consistently ensuring appropriate prioritization and scheduling of ADA-eligible trips. PTS has since taken steps to clearly distinguish these services within its scheduling and dispatch processes.

As a small rural transit provider, PTS may experience capacity constraints when demand for ADA paratransit trips exceeds available vehicles and staff at a given time. In such cases, PTS may negotiate pickup times with riders; however, in accordance with ADA requirements, PTS does not require ADA-eligible individuals to accept a pickup time more than one hour before or after their requested time. For example, if a rider requests a trip with a 9 a.m. pickup time, Pacific Transit may offer a pickup time between 8 a.m. and 10 a.m. Any scheduling adjustments are made in consideration of the rider's practical travel needs.

PTS is also conducting outreach to previously certified ADA riders who have not renewed their eligibility to support recertification and ensure continued access to services. This effort is supported by the implementation of a new cloud-based computer-aided dispatch system (Spare), which enhances trip management and customer service.



ADA paratransit and microtransit services remain a core component of PTS operations, providing essential mobility for the community. Ridership has nearly returned to pre-pandemic levels, with 12,316 riders served in 2025. PTS continues to evaluate service demand and is committed to expanding capacity and improving access, particularly for individuals requiring critical transportation.

2. Restore Comparable Service Hours: Ensure paratransit operates during the same days and hours as fixed-route service.

Agency Response:

Pacific Transit System (PTS) implemented a new system-wide service schedule effective April 20, 2026, which has been published on the PTS website and communicated through multiple public outreach channels.

All PTS services, including ADA paratransit, now operate during the following hours:

- Monday–Friday: 5:00 AM to 7:00 PM
- Saturday–Sunday: 8:00 AM to 5:00 PM

These updates ensure compliance with ADA requirements for comparable service hours. To support consistent ADA service availability, PTS has implemented operational measures including the use of supervisory and administrative personnel to supplement driver capacity when necessary, as well as the addition of service shifts to maintain adequate service coverage.

PTS has provided public notice of these changes through its website, social media platforms, local radio, and newspapers to promote awareness and encourage community feedback. Customers are encouraged to submit general comments, questions, or concerns through the online Customer Service Form available on the PTS website (<https://pacifictransit.org/contact>), or by email, by phone, or in person at the PTS administrative office.

Completed FOR-105A Customer Service Forms may be submitted electronically on Pacific Transit System’s website or emailed to contact@pacifictransit.org. Customers may also call the Pacific Transit System office at 360-875-9418 or visit in person at 216 2nd Street, Raymond, WA 98577 to submit a complaint, comment, or service suggestion.



Pacific Transit has implemented separate procedures for filing ADA and Title VI complaints. The ADA complaint procedure is outlined in Policy 114: Americans with Disabilities Act (ADA) found here: <https://pacifictransit.org/policies/>

An ADA grievance must be submitted within 60 days following the action(s) upon which it is based. Customers wishing to file a complaint and/or obtain a copy of the ADA Complaint Process Policy may contact the ADA Coordinator at 360-875-9418, or ada@pacifictransit.org, or in person at Pacific Transit's administration office located at 216 2nd Street, Raymond, WA 98577.

The preferred way for Pacific Transit to receive a complaint is in writing using the provided form (FOR-114A: ADA Complaint Form) on its website (or in an alternative accessible format) or by email to the ADA Coordinator. The FOR-114A: ADA Complaint Form is located on the bottom bar of all Pacific County Public Transportation Benefit Area webpages under the "ADA Document Downloads" heading.

Customers can also submit a complaint by using the comment form at <https://pacifictransit.org/contact/>. Customers should state clearly that they are submitting an ADA complaint, so that the complaint will be forwarded immediately to the ADA Coordinator for review. Once Pacific Transit receives the complaint, the ADA Coordinator or their designee will contact the complainant within 15 calendar days to discuss it, gather additional information, and identify possible resolutions. After the initial contact, the ADA Coordinator or designee shall respond within 21 calendar days in writing or other accessible formats.

A copy of Pacific Transit's policy and complaint form for Title VI may also be found at: <https://pacifictransit.org/policies/>. For Title VI complaints, individuals may file a complaint up to one hundred and eighty (180) days from the date the complainant became aware of the incident. All complaints must be signed and written. The complaint should include the following information: The complainant's name, mailing address, and telephone number(s). Complaints may be submitted via email to contact@pacifictransit.org, by mail to PO Box 489, Raymond, WA 98577, or in person at Pacific County Public Transportation Benefit Area's administration office located at 216 2nd Street, Raymond, WA 98577. Complaints or concerns shall be assigned to the Title VI Coordinator for investigation and follow up. A written response containing the investigations findings and/or corrections will be drafted within (30) days of the complaint's origination.

3. Implement a Formal ADA Complaint Process: A designated ADA Coordinator, Written procedures and timelines, Written findings issued promptly to complainants.

Agency Response:

Following significant staffing changes in 2025, PTS has updated its ADA Coordinator contact information and ensured it is clearly posted on the agency website. A dedicated ADA Coordinator email address (ada@pacifictransit.org) has also been established. The ADA Coordinator is a specialized role responsible for ensuring an organization complies with federal and state disability laws. The ADA Coordinator serves as the agency's primary point of contact for disability-related matters, including processing and implementing reasonable accommodation requests for transit services. This position is responsible for investigating and resolving complaints related to accessibility and disability discrimination, coordinating corrective actions when necessary, and ensuring compliance with ADA requirements. In addition, the ADA Coordinator manages the ADA paratransit eligibility application and certification process, including applicant communications, documentation review, and coordination of eligibility determinations.

PTS has developed revised ADA policies that clearly separate general Dial-A-Ride services from ADA complementary paratransit services. These policies and supporting forms are currently under review by WSDOT and PTS's contracted ADA training provider.

The updated ADA documentation includes:

- Americans with Disabilities Act (ADA) Policy: <https://pacifictransit.org/wp-content/uploads/2026/04/Pacific-Transit-System-American-Disabilities-Act-Policy.pdf>
- ADA Complaint Form: <https://pacifictransit.org/wp-content/uploads/2026/01/ADA-Complaint-form.pdf>
- Paratransit Application: <https://pacifictransit.org/wp-content/uploads/2026/04/FOR-306A-Paratransit-Application-Pacific-Transit-System.pdf> or <https://pacifictransit.org/dial-a-ride/>
- Paratransit Eligibility Letter Templates
- Recertification Notices
- Passenger Rules and Conduct Policies



These updates establish clear procedures, timelines, and written findings for ADA complaints and ensure compliance with ADA requirements. To share information about its ADA complaint process, Pacific Transit has placed the above policies and forms on its website (<https://pacifictransit.org/policies/>). These policies explain that an ADA grievance must be submitted within 60 days following the alleged incident. Once Pacific Transit receives the complaint, the ADA Coordinator or their designee will contact the complainant within 15 calendar days to discuss it, gather additional information, and identify possible resolutions. After the initial contact, the ADA Coordinator or designee shall respond within 21 calendar days in writing or other accessible formats. The response shall explain Pacific Transit's conclusions regarding the grievance and, if appropriate, suggest options for resolving the grievance. An ADA complainant has the right to request an appeal within 15 calendar days from the date of the ADA Coordinator's response; the appeal process is also outlined in Policy 114: Americans with Disabilities Act (ADA).

4. Conduct Comprehensive Staff Training: Training must cover the following topics discussed in the "Understanding ADA" free, online course offered by the National Transit Institute.

Agency Response:

Pacific Transit System (PTS) satisfied the training requirements of this corrective action by delivering comprehensive, in-person ADA training in lieu of the online course offered by the National Transit Institute. In-person training on April 29–30, 2026 was completed by all current Pacific Transit administrative staff including the ADA Coordinator, Dispatchers, Field Supervisors, Operations Manager, Operations Supervisor, Fleet & Facilities Manager, Fleet Supervisor, Mechanics, Facilities Supervisor, Facilities Tech, IT Specialist, Planning & Grants Manager, and Director of Finance & HR. The training was delivered by Delta Services Group, a firm with extensive experience providing ADA compliance training to public transit agencies across Washington State.



The training curriculum consisted of four primary components, as detailed below:

- ADA 101: Overview of U.S. Department of Transportation ADA regulations for public transit, including accessibility of services, equipment maintenance, passenger assistance requirements, and employee training responsibilities.
- Paratransit Requirements: Detailed instruction on ADA complementary paratransit regulations, including the six service criteria and management of capacity constraints such as trip denials, on-time performance, and passenger ride time.
- Reasonable Modifications: Guidance on evaluating and responding to passenger requests for reasonable modifications to policies, practices, or procedures.
- Complaint Management and Service Delivery Practices: Best practices for handling ADA-related complaints and ensuring consistent, compliant service delivery.

Post-April 2026, Delta Services Group will also provide policy review services, additional in-person instruction, and follow-up support to ensure lasting operational improvements and full understanding of ADA requirements.

A plan is in place to ensure that the incoming Pacific Transit Executive Director receives equivalent training that covers the above topics. The incoming Pacific Transit Executive Director will complete the online Understanding ADA course through the National Transit Institute and will attend future in-person instruction offered by Delta Services Group.

Going forward, PTS will maintain a structured ADA training program for all employees. With support from Delta Services Group, PTS is developing a role-specific curriculum for operators serving both fixed-route and ADA paratransit services to be completed by Fall 2026. Topics will include wheelchair securement, lift operation, ADA regulatory requirements, communication with passengers with disabilities, service animals/service animals in training, Personal Care Assistants (PCAs), and emergency procedures.

In addition to CDL-required mobility device securement training, all operators must demonstrate proficiency on securement equipment prior to entering revenue service and will complete annual refresher training. PTS will supplement this



program with additional resources, including National RTAP “ADA Driver Training” and similar courses.

Administrative staff will continue to receive ongoing training through online programs, including those offered by the National Transit Institute, as well as annual internal policy review sessions.

5. Document and Justify Any Safety-Related Service Restrictions: Pacific Transit must maintain written incident reports and follow due process before restricting service.

Agency Response:

Pacific Transit System (PTS) has implemented new procedures and standardized forms to document safety-related incidents and customer service events. Incident reports submitted by Pacific Transit internal staff and operators are now completed for any safety-related service restriction and maintained as part of the agency’s official records. Vehicle accidents, passenger accidents, or other employee or passenger incidents must be documented using the electronic or written FOR-308B Incident Report (<https://form.jotform.com/260985016395061>). Pacific Transit utilizes an Excel-based electronic system managed by the Pacific Transit HR Department, to monitor timelines and staff assigned for investigation and follow-up of each incident.

PTS encourages customers to fill out a written comment or complaint using the agency-provided form, FOR-105A: Customer Service Form. The electronic form is available on Pacific Transit’s website and is considered the primary and most direct method for recording either compliments or complaints. Completed FOR-105A Customer Service Forms may be submitted electronically on Pacific Transit System’s website <https://pacifictransit.org/contact/> or emailed to contact@pacifictransit.org. Forms may also be delivered to the Pacific Transit Office located at 216 2nd Street, Raymond, WA 98577 or by U.S. Mail to PO Box 489, Raymond, WA 98577.

Customers may call the Pacific Transit System office at 360-875-9418 to submit a complaint, comment, or service suggestion. Pacific Transit System staff will record the provided comments on the standard Customer Service Form (FOR-105A).

Anyone who submits a complaint, comment, or service suggestion to Pacific Transit System and provides a phone number, mailing address, or email address, shall



receive an initial acknowledgment of the complaint/comment within three (3) business days of receipt.

Written customer complaints and incident reports must be submitted to the Director of Human Resources for review and recordkeeping under POL-101: Public Records. Incident reports, complaints, or concerns shall then be assigned to an appropriate Pacific Transit staff member for investigation and follow-up. Comments and/or suggestions about Pacific Transit System services will be assigned to staff responsible for service development or another appropriate department for investigation and follow-up.

Pacific Transit maintains an electronic tracking system for all complaints which provides a unique identification of each incident report and/or complaint and allows ready access to information on the status of the complaint. The process, which consists of data entry, assignment, tracking, follow-up, response, and reporting, shall be managed by designated staff.

Pacific Transit shall promptly provide a response to the customer making a complaint within fifteen (15) business days of receipt of the complaint. Should the period of time needed for response exceed fifteen days, the person making the complaint shall be advised of the status, in addition to receiving a final response. Responses shall be in the format requested, i.e., written, verbal, e-mail, and/or alternative or accessible format.

This process ensures that service restrictions are documented, reviewed, and supported by due process in accordance with ADA requirements.

- 6. Reinstate and Document Reasonable Modifications and Origin-to-Destination Service: Including, at a minimum: Provision of origin-to-destination service for ADA complementary paratransit eligible riders, including door-to-door assistance when necessary for the rider to safely and independently use the service, as required by 49 CFR §37.129(a); Assistance beyond the curb, such as opening exterior building doors and providing boarding and alighting support, when required and when such assistance does not pose a direct threat or result in a fundamental alteration of service, consistent with 49 CFR §37.129(a) and §37.3; and Accommodation and securement of mobility devices, including mobility scooters, in accordance with ADA and FTA requirements under 49 CFR Part 37.**

Agency Response:

All approved ADA Paratransit passengers will be given a Level of Service designation which identifies the basis for Operator assistance. Unless otherwise declared, all passengers will be assumed curb-to-curb, meaning that capable passengers are expected to meet the ADA Paratransit vehicle at the curb near the main entrance of the scheduled pick-up location. PTS provides door-to-door assistance as a reasonable modification when necessary for ADA-eligible riders to safely and independently use the service. Drivers may assist riders beyond the curb, including opening exterior doors and providing boarding and alighting support, when it does not create a direct threat or fundamentally alter service.

A reasonable modification can be requested:

1. When applying for an ADA Paratransit Eligibility Certification.
2. During a call to Pacific Transit System's Office at 360-875-9418 or 360-642-9418 when making an ADA Paratransit reservation.
3. In advance of all transportation services provided by Pacific Transit System via Pacific Transit System's customer service or through Pacific Transit System's complaint process.
4. With an on-the-Spot Request: If it is not feasible to make the request in advance you may ask the driver. The driver has the right to determine on-the-spot if the request will be a service alteration or a direct threat to the safety of the passengers. If found to be a service alteration or a safety threat, the request will be denied. The driver will call dispatch to be recorded.



All requests should state the modification requested and why it is needed to allow the customer to use fixed route or ADA Paratransit services.

PTS policy does not allow drivers to enter private residences or remain out of sight of vehicle camera systems for safety and liability reasons.

PTS accommodates and secures mobility devices, including mobility scooters, in accordance with ADA requirements. Riders must be able to independently operate their electric mobility devices and safely maneuver them onto the vehicle so they can be properly secured. Drivers are not permitted to operate electric wheelchairs or scooters.

7. Improve Recordkeeping and Data Systems: Maintain accurate logs for: Trip requests, Denials and reasons, Pickup and drop-off performance, ADA rider outcomes.

Agency Response:

Over the past 12 months, PTS has implemented a cloud-based computer-aided dispatch system (Spare) to improve recordkeeping and ADA compliance monitoring.

The system maintains accurate logs of:

- Trip requests
- Denials and reasons
- Pickup and drop-off performance
- ADA and non-ADA rider outcomes

The Spare system improves onboarding and record retention by allowing digital management of ADA applications, recertifications, and eligibility communications. Riders can track application status, securely submit documentation, book trips through an app, and receive real-time vehicle tracking and accurate ETAs.

Data related to rider outcomes (denials, trip requests, OTP, etc.) will be reviewed on a monthly basis by the PTS administrative team to address capacity constraint concerns and improve customer service.

8. Ensure Board Oversight and Notification: The Pacific Transit Board must receive this findings letter, review the CAP, and provide ongoing governance oversight.

Agency Response:

The Pacific Transit System (PTS) Board of Directors has received the ADA findings letter and reviewed the Corrective Action Plan (CAP). Board members were invited to attend the ADA training conducted on April 29–30, 2026, and Board representation was present.

PTS follows a formal two-step policy adoption process requiring both first and second reading prior to approval. This process ensures appropriate Board review and oversight of the CAP and all associated ADA policies. Final adoption is scheduled for the June 2026 regular Board meeting.

PTS Regular Board Meetings are held monthly on the third Thursday of each month. The location and time of the upcoming Board meeting, as well as the record of approved Board meeting minutes may be accessed on Pacific Transit's website: <https://pacificttransit.org/board/>

To ensure ongoing governance oversight, the Board will receive regular updates on ADA compliance and CAP implementation. Staff will provide quarterly reports that include performance data, compliance metrics, and any corrective actions. ADA compliance will also be incorporated as a recurring agenda item to ensure continued transparency and accountability to both the Board and the public.

9. Publish the Current ADA Plan and ADA Coordinator Contact Information:

Agency Response:

Upon approval by WSDOT and the PTS Board of Directors, the final ADA Plan will be published on the PTS public website. The plan will include corrective action responses, updated ADA policies, complaint procedures, reasonable modification processes, and service standards.

PTS has already published the ADA Coordinator's name, title, phone number, email address, and mailing address on the website. Customers may contact the ADA Coordinator by phone at 360-875-9418, by email to ada@pacificttransit.org, or in



person at Pacific Transit System's administration office located at 216 2nd Street, Raymond, WA 98577.

A press release and public outreach campaign will be conducted to announce completion of the ADA Plan. In May 2026, the PTS website will be redesigned to clearly separate ADA paratransit standards from general Dial-A-Ride services and improve accessibility of ADA information.

PTS will also communicate updates to community stakeholders, senior centers, care facilities, and social service partners and promote free travel training services to ensure riders and caregivers understand their rights, complaint procedures, and reasonable modification options.

This approach supports transparency and ensures ADA riders have clear access to information and services.



Conclusion

Pacific Transit System (PTS) is committed to achieving and sustaining full compliance with the Americans with Disabilities Act and ensuring equitable, accessible transportation services for all members of the community. Through the actions outlined in this Corrective Action Plan, PTS has taken meaningful steps to strengthen policies, improve operational practices, enhance staff training, and reinforce governance oversight. These efforts reflect an organizational commitment not only to regulatory compliance, but to continuous improvement in service quality and accessibility. PTS will continue to monitor implementation, evaluate performance, and make necessary adjustments to ensure that ADA requirements are consistently met and that individuals with disabilities receive safe, reliable, and dignified transportation services.



Pacific County Public Transportation Benefit Area

POLICY 114: AMERICANS WITH DISABILITIES ACT (ADA) POLICY

Effective Date: May 21, 2026

Cancels: ADA Policy (Rev. 05/01/2024); Reasonable Modification of Public Transportation Services Policy (01/30/2025); Appeal Process (Rev. 01/30/2025)

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PURPOSE

This policy applies to the Americans with Disabilities Act (ADA), which was signed into law on July 26, 1990. The ADA is civil rights legislation which requires, among other things, that persons with disabilities receive transportation services equal to those available on the fixed route service.

POLICY

It is the policy of Pacific County Public Transportation Benefit Area to comply with all federal and state laws ensuring readily accessible and usable service to individuals with disabilities to the maximum extent possible. Furthermore, it is the company policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions and privileges of employment.

1. General Provisions

- a. Pacific County Public Transportation Benefit Area will notify the public of the ADA policy.**
 - i. Notification to the public will be placed in English and in Spanish on its website www.pacifictransit.org and in the printed rider guide.
 - ii. Customers wishing to obtain a copy of the ADA Policy may contact the ADA Coordinator at 360-875-9418, or ada@pacifictransit.org, or in person at Pacific County Public Transportation Benefit Area's administration office located at 216 2nd Street, Raymond, WA 98577.
- b. Pacific County Public Transportation Benefit Area does not charge a fare for its fixed route, commuter route, or ADA paratransit transportation services.**
- c. Pacific County Public Transportation Benefit Area May Establish Priority Seating**
 - i. Upon request, vehicle operators shall ask – but not require – ambulatory passengers to relinquish priority seating at the front of the vehicle to seniors and persons with disabilities.
 - ii. Operators are not required to enforce the priority seating designation beyond making such a request.
- d. Requests for modifications of Pacific County Public Transportation Benefit Area policies, practices, or procedures to accommodate an individual with a disability may be made either in advance or at the time of the transportation service.**
 - i. Pacific County Public Transportation Benefit Area is best able to address and accommodate customers, when they make their requests directly to Pacific County Public Transportation Benefit Area prior to their trip.

- ii. Requests for a modification to Pacific County Public Transportation Benefit Area's policies and practices may be denied if the requested modification is unreasonable, if it:
 - 1. Would fundamentally alter the nature of the Pacific County Public Transportation Benefit Area's services, programs or activities;
 - 2. Granting the request would create a direct threat to the health or safety of others;
 - 3. Without the requested modification, the individual with a disability is able to fully use Pacific County Public Transportation Benefit Area services; or
 - 4. The request would cause an undue financial and administrative burden.
- iii. A reasonable modification can be requested:
 - 1. When applying for an ADA Paratransit Eligibility Certification.
 - 2. During a call to Pacific County Public Transportation Benefit Area's Office at 360-875-9418 or 360-642-9418 when making an ADA Paratransit reservation.
 - 3. In advance of all transportation services provided by Pacific County Public Transportation Benefit Area via Pacific County Public Transportation Benefit Area's customer service or through Pacific County Public Transportation Benefit Area's complaint process.
 - 4. With an on-the-Spot Request: If it is not feasible to make the request in advance you may ask the driver. The driver has the right to determine on-the-spot request if it will be a service alteration or a direct threat to the safety of the passengers. If found to be a service alteration or a safety threat, the request will be denied. The driver will call dispatch to be recorded.
- iv. All requests should state the modification requested and why it is needed to allow the customer to use fixed route or ADA Paratransit services.

e. Use of Portable Oxygen

- i. Individuals with disabilities who use portable oxygen devices are allowed to travel with respirators and properly secured portable oxygen supplies (49 CFR 37.167(h)). Oxygen supplies must not obstruct the aisle.

f. Pacific County Public Transportation Benefit Area vehicles can accommodate passengers or their mobility devices that meet the following minimum standards:

- i. A wheelchair belonging to any class of three or more wheels, usable indoors, designed or modified for and used by individuals with mobility impairments, whether manually operated or powered.

- ii. Walkers must be collapsible and stored between seats or in the vehicle's trunk.
- iii. Wheelchair lifts are to be used only for passengers riding in wheelchairs or for standees who cannot navigate the steps of the vehicle.
- iv. When occupying a lift or securement area, it is recommended that passengers apply the brakes on their mobility devices; however, they are not required to do so. With power chairs or scooters, it is recommended that the power switch be turned to the "off" position, but it is not mandatory.

g. Pacific County Public Transportation Benefit Area secures wheelchairs

- i. Vehicle Operators are expected to use front and rear securement straps (tie-downs) to secure mobility devices using a four-point securement method according to PRO-306A: Securing a Mobility Device.
- ii. Operators will secure mobility devices at the designated securement points or strongest parts of the device.
- iii. Operators should refrain from assisting passengers using power chairs or scooters with the operation of their equipment.
- iv. Pacific County Public Transportation Benefit Area will not refuse to transport someone whose mobility device cannot be satisfactorily secured provided that mobility device fits within the definition described in Section 1(e). (49 CFR 37.165)

h. Traveling with a Personal Care Attendant (PCA) or Companion

- i. A Personal Care Attendant (PCA) may ride with an ADA Paratransit eligible passenger at no charge.
 - 1. A PCA is someone who travels with, and helps, a rider who is not able to travel or perform other tasks alone.
 - 2. A PCA is not expected to assist with the transportation or securement process unless transportation is one of the reasons the PCA is accompanying the passenger.
 - 3. Passengers requiring the assistance of a PCA must provide their own if one is needed.
 - 4. The PCA must board and de-board at the exact location as the passenger.
 - 5. The passenger is only allowed one PCA.
- ii. Guests and companions are allowed to accompany the passenger on a space available basis. Companions pay the same fare as the passenger and must board and de-board at the exact location as the passenger.
 - 1. A PCA is not considered a companion. The passenger can have a companion along with a PCA.
 - 2. The passenger is asked to contact the office when making a reservation if a companion will be traveling with them.
 - 3. More than one companion can ride with the passenger if space is available.

i. Operator Assistance during Boarding's and Alighting's

- i. Operators shall position the vehicle to make boarding and alighting as easy as possible for all passengers, minimize the slope of the ramp, and use the kneeling option as needed. Operators are expected to provide reasonable assistance to passengers as necessary or upon request.

j. Maintenance of Vehicle Ramps or Lifts

- i. Operators, as part of the pre-trip inspection process, will test the lift or ramp on their assigned vehicle before each day of service.
- ii. The breakdown or malfunction of accessibility equipment will be reported immediately to dispatch.
- iii. A vehicle with an inoperable lift or ramp must be removed from service as soon as possible and cannot be returned to service until repaired.
(49.CFR 37.163)

1. Demand response service vehicles with an inoperable lift/ramp may remain in service for the remainder of the day if Pacific County Public Transportation Benefit Area can assign riders requiring accessibility equipment to another vehicle.

k. Traveling with a Service Animal and/or Service Animal Trainee

- i. The service animal 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 or service animal trainee.
- ii. The service animal must remain under the control of the owner and always behave appropriately
- iii. A service animal trainer may be required to remove a service animal trainee if the animal is not trained to urinate and defecate outside of the facility or only in an appropriate place, or the animal is out of control and effective action is not taken to control the animal.
- iv. Birds, reptiles, amphibians, rodents, and cats must be kept in an enclosed carrier.
- v. The animal must be kept at your feet or lap if it is small. It may not sit on a vehicle's seat.
- vi. The animal must not be aggressive toward people or other animals. Service animals that are deemed to pose a threat to the health or safety of Transit Operator or other passenger, create a disruptive atmosphere, or are otherwise not under the passengers' control may be prohibited from riding on Pacific County Public Transportation Benefit Area's vehicles.
- vii. Caring for a service animal is the responsibility of the passenger or PCA.
- viii. Service animals are not limited to one service animal per passenger.
- ix. Other passengers or Pacific County Public Transportation Benefit Area's personnel's allergies to dogs or other animals are not grounds to deny service to a person accompanied by a service animal.

I. Pacific County Public Transportation Benefit Area may deny service based on Direct Threat

- i. Pacific County Public Transportation Benefit Area follows RCW 9.91.025, Unlawful Transit Conduct, when evaluating denial of service.
- ii. If a person is violent, seriously disruptive, or engaging in illegal conduct Pacific County Public Transportation Benefit Area may, consistent with established procedures for all riders, refuse to carry the passenger.
- iii. A person who poses a significant risk to others may be excluded from service if reasonable modifications to the public accommodation's policies, practices, or procedures will not eliminate that risk. (49CFR 37.5 App. D/ 29 CFR 36.208)
- iv. Behaviors that may cause immediate exclusion from the system include:
 1. Destruction of public property (the vehicle, and/or its furnishings)
 2. Doing violence to others or to oneself
 3. Behavior that is seriously unruly, seriously disruptive, threatening, or frightening to others
 4. Behavior that interferes with the safe operation of the vehicle
 5. Violations of service animal policy by failing to control one's service animal
 6. Violations of operating rules governing the provision of transportation system-wide
 7. Engaging in illegal conduct.
 8. Other conduct judged by Pacific County Public Transportation Benefit Area to represent an actual or potential threat to the health, safety or wellbeing of oneself, the operator, other passengers, and/or transit personnel.
- v. Periods of Exclusion
 1. Day Suspension: Day Suspensions are used in the event inappropriate or unacceptable behavior is demonstrated.
 - Operators have the discretion to administer a day suspension
 - Day Suspensions have potential to move to a temporary suspension or criminal trespass after management review.
 2. Criminal Trespass: Criminal trespass occurs with severe behavior and events.
 - Criminal trespasses are considered indefinite and permanent.
 - Criminal trespass is a last resort and will be implemented when all other suspensions options have failed, unless the specific situation warrants it.
 - Criminal trespasses are subject to Pacific County Public Transportation Benefit Area management discretion.
 3. Temporary Suspension: Temporary suspensions are administered as an alternative to criminal trespass and are based on severity.

- Suspensions are subject to Pacific County Public Transportation Benefit Area management discretion.
 - Pacific County Public Transportation Benefit Area management has the authority to select a period of up to 30 days, depending on the severity of the issue.
 - Suspension end dates are established on the last day of the month. For example, if suspended on Nov 5th for 30 days, a passenger could utilize service again on December 1st.
- vi. Passengers who are excluded from the system due to a direct threat have - the ability to request an administrative appeal by contacting Pacific County Public Transportation Benefit Area at 360-875-9418.

2. Fixed Route Specific

- a. **Bus Stops at major intersections, transfer points, and destination points will be announced on fixed route buses. Operators will announce other stops upon request. (49 CFR 37.167 (a-c))**
- b. **Reserved Areas for Wheelchair Securement**
- i. Mobility device securement areas on fixed route buses are reserved. All 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 bus operator's request to make these seats available to older adults and people with disabilities who prefer to use them.
 - ii. Passengers using mobility aids shall be boarded if the securement areas are not otherwise occupied by a mobility device, regardless of the number of passengers on the vehicle.
 - iii. Operators are required to ask non-mobility device passengers sitting in the securement areas to move to other available seats or to stand if needed for the securement of a mobility device.

3. ADA Paratransit Specific

- a. **Pacific County Public Transportation Benefit Area will make available ADA Paratransit service to passengers unable to use the fixed route due to a mobility limitation.**
- i. Pacific County Public Transportation Benefit Area ADA Paratransit service operates the same hours and days as Pacific County Public Transportation Benefit Area's fixed route service.

Note: Pacific County Public Transportation Benefit Area uses a combination of ADA Paratransit reservations and fixed-route deviations to meet demand for eligible trips.

b. Eligibility: Pacific County Public Transportation Benefit Area will strictly observe the standards contained in 49 CFR 37.123(e) in determining eligibility for complementary ADA Paratransit service.

- i. Passengers meeting one or more of the following criteria are considered eligible for ADA Paratransit service:
 1. A person who is unable to board, ride or exit any vehicle independently on the fixed route system.
 2. A person who has an impairment-related condition that prevents getting to or leaving a bus stop.
 3. A person who would be able to access a fixed route vehicle via a ramp/lift, but is unable to access the vehicle due to the ramp/lift's inability to be deployed safely at their bus stop.

c. Application: Eligible passengers seeking ADA Paratransit service must apply to Pacific County Public Transportation Benefit Area for approval (FOR-306A).

- i. Pacific County Public Transportation Benefit Area will render a decision to the applicant within 21 days of receiving the completed application.
- ii. Applications are considered complete when:
 - The applicant questionnaire and informed consent are complete and signed
 - The professional verification portion of the application is completed and signed
 - The in-person interview is concluded (if necessary)
- iii. *In-Person Interview:* All applicants may be interviewed by Pacific County Public Transportation Benefit Area staff as part of the application process.
 - Pacific County Public Transportation Benefit Area will schedule a no-charge visit to the Pacific County Public Transportation Benefit Area office to conduct the Interview.

d. Determination

- i. Applicants for ADA Paratransit service must demonstrate their inability to utilize the fixed route system prior to being granted approval.
- ii. Prior to approval, prospective ADA Paratransit passengers will be required to obtain verification from a licensed medical service provider to validate the mobility related claims.
- iii. Pacific County Public Transportation Benefit Area may seek supplemental information from an applicant's healthcare provider to determine appropriate eligibility.

- iv. Temporary approval to use ADA Paratransit service will be granted to applicants that have not received a determination of eligibility within 21 days after completing the application process.

e. Denial and Appeal:

- i. Applicants considered ineligible for ADA Paratransit service will be notified in writing. Denial letters must cite the specific reason for denial (49 CFR 37.125(d)) and will be sent to applicants within 21 days of receiving the completed application.
- ii. Applicants who are denied eligibility to ADA Paratransit may appeal the decision within 60 days of receiving notice of their denial. Pacific County Public Transportation Benefit Area will comply with 49 CFR 37.125(g) when administering appeals of denied ADA Paratransit eligibility.
 - 1. *Full-functional Assessment:* Denied passengers who are appealing Pacific County Public Transportation Benefit Area's decision may be required to submit to a full-functional assessment as part of the appeals process.
 - 2. *Appeals Hearing:* Once the intent to appeal is received, Pacific County Public Transportation Benefit Area will schedule an Appeals Hearing within 30 days. Appeals will be heard by a panel, to include the Pacific County Public Transportation Benefit Area Executive Director and not less than two other panelists who did not participate in the denial decision. Pacific County Public Transportation Benefit Area staff who determined the original denial may attend and participate in the appeal hearing but will not be eligible to sit as a panelist or vote on the appeal. Decisions made by the Panel are considered final and are not subject to further appeal.
 - 3. *Applicant Participation:* Denied applicants are encouraged to attend the appeals hearing and may invite observers or advocates to the hearing to provide relevant testimony regarding the applicant's mobility or cognitive abilities. The appellant may attend in person along with an attendant or representative if desired; however, attending in person is not required.
 - 4. *Temporary Eligibility:* Applicants who are not considered eligible will not be allowed use of ADA Paratransit during the appeals process, however, previously approved passengers who are appealing a change in eligibility category will be allowed to remain in their existing eligibility category until the appeals process is complete.

5. *Panel Decision:* The panel considering the appeal will render a decision within 30 days of the Appeals Hearing and will provide the decision and reasons for the decision to the appellant in writing. Passengers will be considered temporarily eligible for ADA Paratransit service if a decision has not been made within the 30-day period.

f. Approval of ADA Paratransit service will be granted for three (3) years.

- i. Eligibility Categories: Applicants approved for ADA Paratransit service will be notified in writing. Approved passengers will receive a letter that declares the passenger's eligibility category and offers instructions on how to use the ADA Paratransit system. Eligibility categories are as follows:
 1. Unconditional Eligibility: Passengers granted unconditional eligibility will be permitted to use ADA Paratransit service for any trip located within the ADA service area (see POL-108 Service Development).
 2. Conditional Eligibility: Passengers granted conditional eligibility will be permitted to use ADA Paratransit service only for those trips that cannot be made using Pacific County Public Transportation Benefit Area fixed route bus service.
 3. Temporary Eligibility: Passengers granted temporary eligibility will be permitted temporary use of ADA Paratransit service according to the recommendations of their medical care provider(s). Temporary eligibility will not exceed two (2) years in duration. Passengers with temporary eligibility will receive 45 days' notice of the expiration of their eligibility.
 4. Visitor Eligibility: Visitor eligibility is granted to passengers who are visiting from another community who have been deemed eligible in their home system. Visitor eligibility must not exceed 21 days in a calendar year. Passengers whose visit exceeds 21 days will be required to apply to Pacific County Public Transportation Benefit Area for ADA Paratransit approval.
 - A visitor who has been certified ADA Paratransit from another transit provider will be considered eligible by Pacific County Public Transportation Benefit Area upon receipt of the other transit providers ID card or other documentation.
 - If the individual has no such documentation, Pacific County Transit will require provision of proof of visitor status i.e., proof of residence somewhere else) and, if

the individual's disability is not apparent, proof of disability (i.e., a letter from a doctor, rehabilitation professional). Once this documentation is presented and is satisfactory, Pacific County Public Transportation Benefit Area will make service available based on the individual's statement that they are unable to use the fixed route transit system.

- ii. Level of Service Designation: All approved passengers will be given a Level of Service designation which identifies the basis for Operator assistance. Unless otherwise declared, all passengers will be assumed *curb-to-curb*. The three Levels of Service categories are as follows:
 - 1. *Curb-to-Curb*: Passengers who are capable and expected to meet the ADA Paratransit vehicle at the curb near the main entrance of the scheduled location.
 - 2. *Door-to-Door*: Passengers who require Operator assistance traveling between the main entrance and the Pacific County Public Transportation Benefit Area vehicle.
 - 3. *Hand-to-Hand*: Passengers who require Operator assistance traveling between the main entrance and the Pacific County Public Transportation Benefit Area vehicle; passengers designated hand-to-hand must not be left alone or dropped off at a location that does not have a receiving caregiver.
- iii. Pacific County Public Transportation Benefit Area provides curb-to-curb service. If a rider requires door-to-door service, the rider must request this service at the time of reservation. Pacific County Public Transportation Benefit Area 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. Pacific County Public Transportation Benefit Area cannot take actions that would fundamentally alter the nature of its service or create undue burdens.

g. Recertification: All passengers must participate in a re-certification process every 36 months to remain eligible for ADA Paratransit service.

- i. Passengers who fail to recertify will forfeit eligibility and must re-apply with Pacific County Public Transportation Benefit Area to regain access to ADA Paratransit.
- ii. Pacific County Public Transportation Benefit Area will notify existing passengers, in writing, of the need to recertify for ADA Paratransit

service; notices will be mailed to passengers not less than 60 days prior to the expiration of their existing eligibility.

h. Scheduling an ADA Paratransit Trip

i. Service Area

1. Pacific County Public Transportation Benefit Area's ADA Paratransit Service is provided to locations within $\frac{3}{4}$ of a mile on either side of local fixed-route bus routes.

ii. Origin to Destination Service

1. Both the start and end point of an ADA Paratransit trip must be within the $\frac{3}{4}$ of a mile designated corridor.

iii. ADA Paratransit Hours

1. ADA Paratransit Service operates the same hours as the Pacific County Public Transportation Benefit Area's fixed route system.

iv. Holidays

1. ADA Paratransit Service operates the same hours and days as the Pacific County Public Transportation Benefit Area's fixed route system for reduced holiday services. The list of all holiday closures and reduced service hours may be found on Pacific County Public Transportation Benefit Area's website on the Route Schedule page and in the print and digital copies of the rider guide.

v. Trip Scheduling

1. ADA Paratransit reservations can be scheduled seven (7) days a week, Monday through Sunday during regular office hours. Voicemail is available during off hours and holidays. Reservations are required to be made at least one day before the passenger plans to travel. Pacific County Public Transportation Benefit Area does not schedule same-day rides.
2. Pacific County Public Transportation Benefit Area will accept ADA Paratransit trip reservations up to 14 days in advance.

vi. Trip Purpose

1. Pacific County Public Transportation Benefit Area provides paratransit service for trips of any purpose and does not prioritize or deny specific types of trips.

vii. Companions and Personal Care Attendants

1. Guests and companions are allowed to accompany the passenger on a space available basis. Companions pay the same fare as the

passenger and must board and de-board at the exact location as the passenger.

2. A Personal Care Attendant (PCA) may ride with an ADA Paratransit eligible passenger at no charge.
 - A PCA is someone who travels with, and helps, a rider who is not able to travel or perform other tasks alone.
 - A PCA is not expected to assist with the transportation or securement process unless transportation is one of the reasons the PCA is accompanying the passenger.
 - Passengers requiring the assistance of a PCA must provide their own if one is needed.
 - The PCA must board and de-board at the exact location as the passenger.
 - The passenger is only allowed one PCA.
3. Guests and companions are allowed to accompany the passenger on a space available basis. Companions pay the same fare as the passenger and must board and de-board at the exact location as the passenger.
4. A PCA is not considered a companion. The passenger can have a companion along with a PCA.
5. The passenger is asked to contact the office when making a reservation if a companion will be traveling with them.
6. More than one companion can ride with the passenger if space is available.

viii. Call-Back Trip Scheduling

1. Call-backs are calls made for returns when a reserved trip has already been made and because of the trip the passenger does not know when they will be done to schedule the return trip (Example: doctor or hospital appointment). Callback trips will be scheduled as soon as possible when called in, but it can have a waiting period of up to one hour.

ix. Pick-Up Window

1. Pacific County Public Transportation Benefit Area recognizes a 30-minute pick-up window. Passengers may be picked up 15 minutes before or after their scheduled pick-up time.
2. Passengers must be ready to board the vehicle within 5 minutes of the beginning of the scheduled pick-up window.

x. Trip Cancellations

1. ADA Paratransit reservations can be cancelled up to one hour before the scheduled pick-up and not be counted as a no-show.

xi. No-Show Policy

1. A no-show occurs when a rider fails to appear to board the vehicle for a scheduled trip or incurs a late cancellation.
2. Pacific County Public Transportation Benefit Area does not count as no-shows any missed trips due to Pacific County Public Transportation Benefit Area's own error such as:
 - Trips placed on the schedule in error
 - Pick-ups scheduled at the wrong pickup location
 - Drivers arriving and departing before the pickup window begins
 - Drivers arriving late (after the end of the pick-up window)
 - Drivers arriving within the pick-up window, but departing without waiting the required 5 minutes
3. Pacific County Public Transportation Benefit Area does not count as no-shows situations beyond a rider's control that prevent the rider from notifying us that the trip cannot be taken, such as:
 - Medical emergency
 - Family emergency
 - Appointment that runs unexpectedly late without sufficient notice.
4. Riders should contact the Pacific County Public Transportation Benefit Area office when experiencing no-shows or late cancellations due to circumstances beyond their control.
5. When a rider is a no-show for one trip, all subsequent trips on that day remain on the schedule unless the rider specifically cancels the trips. To avoid multiple no-shows on the same day, riders are strongly encouraged to cancel any subsequent trips they no longer need that day.
6. A pattern or practice of No-Shows is automatically established when a customer fails to cancel three (3) or more trips during a monthly period and has been charged a No-Show for 10% or more of his/her trips for the month.
 - Penalties are progressive, which means the severity of the penalty increases if the pattern and practice of No-Shows continues. Each penalty will be calculated based upon the customer's No-Show history over the previous 12-month period.
 - Warnings and suspensions shall be imposed as follows:
 - 1st penalty – Warning Letter

- 2nd penalty – Seven (7) day suspension from Paratransit service
 - 3rd penalty – Fourteen (14) day suspension from Paratransit service
 - 4th penalty – Twenty-one (21) day suspension from Paratransit service
 - 5th penalty – Twenty-eight (28) day suspension from Paratransit service
 - At no time will the suspension period exceed 28 days, and customers will receive no less than a 15-day notice of a suspension before it starts.
7. Riders wishing to dispute specific no-shows [or late cancellations] must do so within 15 calendar days of receiving suspension letters. Riders should contact the Pacific County Public Transportation Benefit Area office at 360-875-9418 during normal business hours to explain the circumstance and request the removal of the no-show or late cancellation.
 8. Riders wishing to appeal suspensions under this policy have the right to file an appeal request, which must be in writing by letter or via email. Riders must submit written appeal requests within 15 calendar days of receiving suspension letters. Riders who miss the appeal request deadline will be suspended from Pacific County Public Transportation Benefit Area on the date listed on the suspension notice. All suspension appeals follow Pacific County Public Transportation Benefit Area's appeal policy as described in Section 4(f).
- i. **Operator Assistance during Boarding and Alighting**
 - i. ADA Paratransit Operators are expected to accompany passengers to/from the threshold of the door as necessary. Operators are not permitted to enter a home or facility to assist a passenger. Passengers with disabilities will be allowed adequate time to board and alight the vehicle.
 - j. **Pacific County Public Transportation Benefit Area counts all denials and missed trips to ensure ADA complementary paratransit service capacity is adequate.**
 - i. If Pacific County Public Transportation Benefit Area cannot schedule or negotiate a requested trip within one hour of the requested trip, this constitutes a trip denial, even if the rider accepts a trip that is beyond the negotiated window.
 - ii. One denial of a multi-legged trip will count as a denial for each leg of the trip.

4. Complaint Procedure

- a. Pacific County Public Transportation Benefit Area 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 RCW 49.60, Washington’s Law Against Discrimination (WLAD). All grievances concerning discrimination in the provision or accessibility of Pacific County Public Transportation Benefit Area programs, benefits or activities or about a response to a request for accommodation or modification of programs, services, benefits, or activities should be submitted to Pacific County Public Transportation Benefit Area.**
- b. To share information about its ADA complaint process, Pacific County Public Transportation Benefit Area will use the same means it uses to inform the general public about its policies and procedures.**
 - i. Notification to the public will be placed in English and in Spanish on its website www.pacifictransit.org and in the printed rider guide.
- c. An ADA grievance must be submitted within 60 days following the action(s) upon which it is based.**
 - i. Customers wishing to file a complaint and/or obtain a copy of the ADA Complaint Process Policy may contact the ADA Coordinator at 360-875-9418, or ada@pacifictransit.org, or in person at Pacific County Public Transportation Benefit Area’s administration office located at 216 2nd Street, Raymond, WA 98577.
 - ii. Any of the following methods can submit a formal ADA grievance: mail, email, or phone. An explanation and reason for the grievance must be included.

Mail:

ADA Coordinator Teresa Ganzel
PO Box 489
Raymond, WA 98577

Physical Address:

ADA Coordinator Teresa Ganzel
216 2nd Street
Raymond, WA 98577

Email:

ada@pacifictransit.org

Phone:

360-875-9418. Persons who are deaf or hard-of-hearing may make a

request by calling Washington State Relay at 711 or 1-800-833-6384.

- iii. The preferred way for Pacific County Public Transportation Benefit Area to receive a complaint is in writing using the provided form (FOR-114A: ADA Complaint Form) on its website (or in an alternative accessible format) or by email to the ADA Coordinator. FOR-114A: ADA Complaint Form is located on the bottom bar of all Pacific County Public Transportation Benefit Area webpages under the “ADA Document Downloads” heading.
 - iv. Customers can also submit a complaint by using the comment form at <https://pacifictransit.org/contact/>. Customers should state clearly that they are submitting an ADA complaint, so that the complaint will be forwarded immediately to the ADA Coordinator.
 - v. It is recommended that customers file a complaint as soon as possible after the alleged incident. Pacific County Public Transportation Benefit Area vehicles and facilities have multiple cameras that are recording to video. Video is a primary source of evidence when investigating a claim of discrimination. However, the video is on a loop and eventually will be recorded over.
- d. Once Pacific County Public Transportation Benefit Area receives the complaint, the ADA Coordinator or their designee will contact the complainant within 15 calendar days to discuss it, gather additional information, and identify possible resolutions.**
- e. After the initial contact, the ADA Coordinator or designee shall respond within 21 calendar days in writing or other accessible formats.**
- i. The response shall explain Pacific County Public Transportation Benefit Area’s conclusions regarding the grievance and, if appropriate, suggest options for resolving the grievance.
- f. An ADA complainant has the right to request an appeal within 15 calendar days from the date of the ADA Coordinator's response.**
- i. The request for appeal may be submitted by mail, email, or phone to:

Mail:

HR Director
PO Box 489
Raymond, WA 98577

Physical Address:

HR Director
326 Commercial Street
Raymond, WA 98577

Email:

hr@pacifictransit.org

Phone:

360-875-9418. Persons who are deaf or hard-of-hearing may make a request by calling Washington State Relay at 711 or 1-800-833-6384.

- ii. Within 21 calendar days after receiving the appeal request, the HR Director or their designee shall either respond to the grievance in written or other accessible format or contact the person making the grievance to obtain any necessary information.
 - iii. If additional information is requested from the person submitting the complaint, the HR Director or their designee shall respond to the grievance within seven days of receiving the additional information.
- g. Pacific County Public Transportation Benefit Area will retain copies of complaints, investigation and resolution documentation, and Pacific County Public Transportation Benefit Area's response to the complaint in accordance with the complaint record retention requirements of the ADA, Washington State Archives Office, and Washington State Department of Transportation Consolidated Grant Program.**