<p style="text-align:center">Meeting Minutes</p>

Date

18 October 2019
Kick Off Meeting

Minutes added in italic text are from follow up conversations held after the original meeting with those that were not in attendance.

Attendance

Present	Name	Representing
Project Advisory Committee		
X	Barry Hoffman	Albany Transit/Linn Benton Loop
X	Ted Frazier	Albany Paratransit
	Brad Dillingham	Benton County Transit
	Lisa Scherf	Corvallis Transit
	Tim Bates	Corvallis Transit
X	Ken Bronstein	Linn Shuttle
X	Cynda Bruce	Lincoln County Transit
	Kindra Oliver	LINX (Lebanon)
	Mark Volmert	Linn County
X	Mark Bernard	Oregon Department of Transportation
X	Phil Warnock	Oregon Cascades West COG—Program Manager
X	Nick Meltzer	Oregon Cascades West COG—Project Manager
X	Katie Trebes	Oregon Cascades West COG—Project Staff
Guests/Other		

I.   Overview and Transit Technology Presentation

The meeting started with an overview presentation of the project, timeline, and goals for the day. The COG is leading the project, however we plan to use participatory decision making at each step to insure we're meeting the needs of our stakeholders.

A second presentation on transit technology followed, outlining the many options for each sub-topic of the Seamless Transit project. This included automatic vehicle location (AVL) information, mobile ticketing, centralized trip planning, driver and travel training, and paratransit eligibility. The meeting attendees then discussed each topic, what challenges or barriers they see for implementation, and what is important to them and their agency for each topic. A summary of this conversation is captured below.

Both presentations can be found attached.

II. Paratransit Eligibility

- Incorporate with mobility training (i.e. if an individual is not eligible for para—direct them to mobility training). This would be easier if it were all integrated.

- Current Practice: If eligible for one system (from other region or other state) eligible for all systems (Albany Transit at least)
- Could a regional form be used? With central processing?
    - Who has access to these forms? Privacy and HIPPA are major concerns
- *Corvallis/Benton County*
    - *Corvallis currently offers and is not interested*
- *LINX*
    - *Does not have fixed route so this is not an issue*

III. Driver/Travel Training

- Regular (monthly) notices would help providers remember what's available
- It would be great to use some TO money to "flag" the rural stops with reflective material. This would be a big help to drivers and has been done previously.
- A training on ADA reasonable accommodations would be useful
- Title VI Awareness (Programmatic and driver) training would be useful
- It would be good to target older populations for travel training
    - Incorporate into literature from transit agencies
    - Advertise
- Engage with younger riders
- 5307 money requires active travel training
    - Solidify regionally
    - Written agreement
    - Capturing ADA referrals
- Dealing with difficult passengers for drivers would be another good training
    - De-escalation
    - Trauma informed care
- *Corvallis/Benton County:*
    - *Benton County does not currently offer any training and welcomes any offerings*
    - *Corvallis Transit is less interested in travel training as they currently provide that service*
    - *Additional suggestions for training including human trafficking, mandatory reporting, mental health first aid and/or training to interact with folks that have intellectual/developmental delays*
- *LINX*
    - *Supports mental health first aid training*
    - *ADA/Title VI training currently happens at ODOT conferences*
    - *Dispatcher training on customer services and dealing with stress would be nice*
    - *Dispatcher "technology" training. For using Excel, etc.*
- *Linn County*
    - *Suggested bringing bus to events to show people how to board, pay fare, load bikes, etc. In person is key as it's less of a barrier*
    - *Could also offer a certain number of free tickets to incentivize initial ridership*

IV. Automatic Vehicle Location

- How does route information change when buses switch between routes

- o Cynda mentioned she already has Swiftly, and it switches automatically
- o On time performance records are also useful for Lincoln County and there is interest for that in Linn County
- GTFS data should be pushed to multiple apps so it can integrate across systems
- Privacy for agency to see demand based routes while public cannot
- Anything we do now should be set up for future evolutions in technology
- Thinking about ongoing cost or replacement schedule for hardware is important
- *LINN County*
  - o *Important to integrate with what others are using if there's existing technology*
  - o *Operators should be allowed to upgrade their GPS units if desired*
  - o *Make sure integrates with GTFS flexride for future adaptability*

V. Ticketing Options
- Reader/scanner to track rider start points
- Identification of senior/disabled use, as well as other group passes
- Maintaining equity for fare use
- Ability to share fare revenue across agencies
- One trip planning interface for the region
  - o IT Involvement would be required
- Insuring equity though still taking paper tickets is necessary
- *Benton County*
  - o *Want to be able to store tickets in a "wallet."*
  - o *Passenger counts would be nice*

VI. Centralized Information Portal
- This was not discussed in much detail and will be addressed at the next meeting
- The issue of co-branding came up and whether if it would be similar to the Northwest Connector
- *Linn County*
  - o *A regional brochure would be great*
  - o *Offering to update operator websites would also be useful through technical assistance*

VII. What Does Success Look Like?
- From ODOT, seamlessness across the state
- Smart people with good intentions naturally leads to success and that's what we have here (note someone said that I'm not adding it in secretly)
- Discuss this at our next meeting, what ongoing success looks like
- This could be adaptive across projects and tasks
- Co-branding/marketing capabilities

VIII.   Next Steps/Action Items
- Katie will look into reflectors for transit stops

Cascades West COG Seamless Transit Project

- OCWCOG will begin sending the existing training schedule out monthly, at the beginning of the month
- Nick and Katie will follow up with those that couldn't attend
- The next meeting will be scheduled for January/February

Table of Interests

Cascades West COG Seamless Transit Project

Table of Interests

The table below illustrates the feedback we received from stakeholders on their level of interest for each of the tasks of the overall project.

Stakeholder	Phase 1			Phase 2			Phase 3
	Task 1 (Driver Training)	Task 2 (Travel Training)	Task 3 (Paratransit Mgmt)	Task 4 (Centralized Information Portal)	Task 5A (Real Time)	Task 6 (Mobile Ticketing)	Task 5B (One Click, One Call)
Albany Transit/Linn Benton Loop	Yes		Maybe	Yes	Yes	Yes	
Benton County Transit	Yes		Maybe	Yes	Yes	Yes	
Corvallis Transit	Yes		No	Yes	Has some capability	Fareless System	
Linn Shuttle	Yes			Yes	Yes	Yes	
Lincoln County Transit				Yes	Already has Swifty	Yes	
LINX (Lebanon)	Yes		Not applicable	Yes	Yes	Yes	
Oregon State University	Yes	N/A	N/A	Yes	Maybe	N/A	
NWOTA							

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<u>Seamless Transit Meeting Agenda</u>

Monday, February 3, 2020
1:30 to 4:00 PM
OCWCOG Albany Office
1400 Queen Avenue SE, Albany

1)	1:30	**Call to Order, Introductions and Agenda Review**	**Staff, Nick Meltzer**
2)	20 min	**Phase I Implementation** *Task 1 and 2 Updates*	**Katie Trebes**
3)	40 min	**Centralized Information State of Practice** *Kevin Chambers of Full Path Consulting will give an overview presentation on information portals used across the state. Group discussion will follow on what will work for the Cascades West Region.*	**Kevin Chambers, Full Path**
4)	15 min	**Real Time Hardware Inventory** *Review of existing technology use by transit agencies in the region. Please bring information on what type of automatic vehicle location (AVL) or automatic passenger counter (APC) your agency uses.*	**All**
5)	60 min	**Real Time Vehicle Information and Mobile Ticketing Vendor Overview and RFP Discussion** *Vendor presentations and follow up discussion on evaluation criteria for future Request for Proposals.*	**Meltzer**
6)	15 min	**Other Business and Next Meeting**	

Teleconference Information:
https://zoom.us/j/235738100

PHONE: +1 669 900 6833 US (San Jose)
Meeting ID: 235 738 100

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MEMBER GOVERNMENTS — **COUNTIES:** Benton, Lincoln and Linn **CITIES:** Adair Village, Albany, Brownsville, Corvallis, Depoe Bay, Halsey, Harrisburg, Lebanon, Lincoln City, Lyons, Millersburg, Monroe, Newport, Philomath, Scio, Siletz, Sweet Home, Tangent, Toledo, Waldport, Yachats **OTHER:** Confederated Tribes of Siletz Indians, and Port of Newport

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SERVICE ANIMAL PILOT PROGRAM: BEST PRACTICES, POLICIES AND PROCEDURES

Quick Guide

Paw Print Fast Facts

A paw print symbol on a passenger's rider card lets the driver know that this passenger has already been asked about the status of their animal.

Program Goals:

- o   Minimize driver ambiguity and confusion about the status of an animal.
- o   Create a more consistent experience for service animal handlers.
- o   Promote expedited boarding.

122 Riders

92.2% overall program satisfaction rate

93.3% of riders perceived faster boardings

91.5% of riders perceived reduction in conflicts

77.8% of riders choose public transit more often

Rider Feedback:

"Kudos to LTD for having this program, as well as other services for making public transit in Eugene/Springfield area easier for persons with disabilities."

197 Drivers

80.1% overall program satisfaction rate

90.7% of drivers perceived faster boardings

78.0% of drivers perceived reduction in conflicts

72.7% of drivers gave a passenger a referral

Driver Feedback:

"The nice thing about the program is that it gives people peace of mind."

Introduction

Communities, businesses, and transit agencies have been made painfully aware of the challenges inherent to transporting animals. There are no easy answers – policies that are too loose might create an environment that is perceived to invite conflict or injury.[1] Conversely, procedures that are too rigid may be perceived to infringe on the rights of people with disabilities.[2] The middle ground requires a degree of thoughtfulness of all employees in situations too diverse to always be prepared for.[3]

The service animal pilot program formally began in 2018 as an attempt to create a better boarding experience for public transit passengers with service animals. The enclosed preliminary findings hope to establish the importance of a consistent voluntary system for expediting boarding when a service animal is involved, and create a pathway for other communities looking to implement a similar program.

The service animal pilot program quickly took a life of its own, even being renamed by both passengers and employees as the "paw print program". As a voluntary program, its strength relies upon making transportation easier for everyone involved. Preliminary data appears to suggest this is true, with drivers becoming fierce proponents of the new program, while regularly informing service animal handlers of the benefits of participation. Riders have been consistently willing to overcome any one-time inconveniences in participation in favor of long term benefits in time and stress reduction.

Any quickly growing program comes with challenges, and success is not immediately reproducible independently of the greater context of the everyday policies and procedures that a transit agency chooses to implement. This document serves as one reference point for considerations when any transit agency reviews how it transports animals in general and service animals specifically. It is hopeful that transit agencies can build on any successes at LTD while avoiding some of the inevitable mistakes made along the way. Should other transit agencies choose to participate, the ultimate goal is to incorporate that additional data into a comprehensive analysis with utility beyond the state of Oregon.

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[1] Oregon family files lawsuit after 'emotional support' pit bull attacks 5-year-old daughter https://abc11.com/oregon-family-files-lawsuit-over-emotional-support-pit-bull/5164546/

[2] LTD faces lawsuit over service dogs https://www.registerguard.com/rg/news/local/36057572-75/holocaust-survivor-sues-lane-transit-district-over-service-dog-dispute.html.csp

[3] 'Emotional support peacock' barred from United Airlines plane https://www.bbc.com/news/world-us-canada-42880690
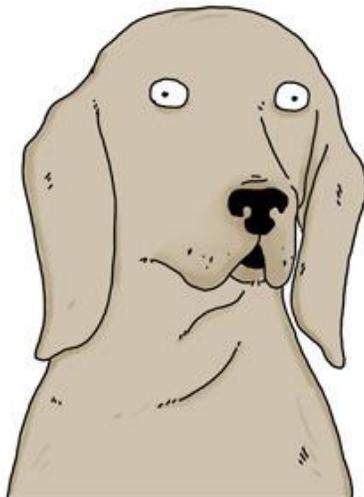
theycantalk.com

i help my blind friend navigate the city

i make sure the airport is safe

i eat shoes

Summary

Improper service animal policies and procedures can create liabilities for transit agencies and frustrating experiences for drivers and riders. A service animal pilot program in Lane County, Oregon aims to demonstrate an initial framework for best practices and procedures when transit agencies look to create improved, consistent experiences for their riders and drivers.
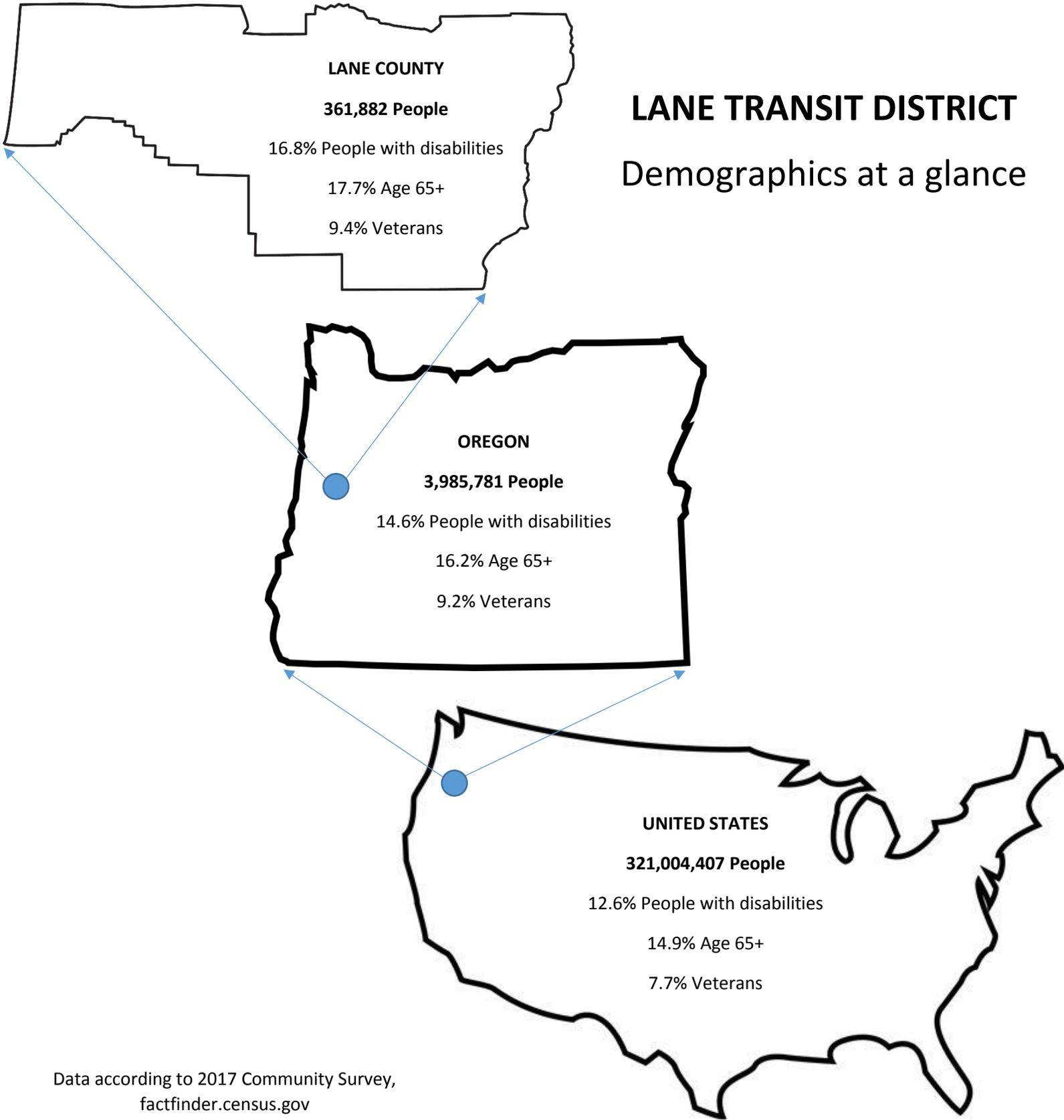
The addition of a service animal "paw print" endorsement onto a rider card has shown dramatic results at Lane Transit District (LTD). An 80% program satisfaction rate for drivers, and an over 90% satisfaction rate for passengers points towards the program being an overall improvement from past practice. Both riders and drivers generally perceive boardings with a paw print to be faster, and with fewer conflicts. Riders also generally report choosing to ride public transit more frequently when using a paw print. LTD now looks to expand the program into other communities to achieve a larger data set, most recently partnering with Rogue Valley Transit District in 2019.

Starting a similar program requires an investment in rider education and driver training. While there cannot be a "magic bullet" solution that solves all problems regarding service animals on public transit, transit agencies should not resign themselves to simply waiting or hoping for regulatory changes to how the ADA is applied.

Service animals and animals in general are clearly treated inconsistently throughout different transit districts, and there is potential for disparate treatment from within a singular public transit system. This increases the risk of liability. A more centralized system utilizing a smaller number of employees with service animal expertise can help relieve some of that pressure. However, the rewards of implementation could also include the potential to trade conflicts that may result in unnecessarily costly litigation in favor of positive outcomes for everyone.

This document is a starting place to have that conversation, and find what works best for Oregon and for the country. Best practices will need to adapt and evolve, but first transit agencies need to make sure they are being intentional about crafting and deploying their service animal policies. We have found that as a transit agency, with some effort we could better serve our community. The challenge to all transit agencies is to do the same.

LANE COUNTY

361,882 People

16.8% People with disabilities

17.7% Age 65+

9.4% Veterans

LANE TRANSIT DISTRICT

Demographics at a glance

OREGON

3,985,781 People

14.6% People with disabilities

16.2% Age 65+

9.2% Veterans

UNITED STATES

321,004,407 People

12.6% People with disabilities

14.9% Age 65+

7.7% Veterans

Data according to 2017 Community Survey,
factfinder.census.gov

This program fully acknowledges that what works best in Lane County may not work in other communities with different populations and different needs. To that end, included is some brief information about demographic considerations, while also recognizing the need for other transit agencies to collect data to improve the data set while establishing greater consistency across different geographies.

Lane County has proportionally more people with disabilities, older adults, and veterans than both Oregon and the United States. This made LTD particularly well positioned for a pilot program with a critical mass of riders who use service animals.

It is challenging to estimate how many service animals exist in Lane County, in Oregon, and in the United States. There does not exist a comprehensive service animal registry. Handlers may choose to self-train their service animals, and so there is no data source that points to an overall estimate of real significance. Guide dogs tend to involve training through organizations and provide one starting point. The California State Guide Dog Board estimates 10,000 guide dogs in the United States. Service Dog Central[4] references a University of Arizona study that estimates .9% of people with disabilities utilize a service animal, at a total of approximately 387,000 service dogs across the U.S., and very roughly estimating 547 service animals in Lane County.

> Rider Feedback:
>
> "As an elderly person with an invisible disability, who has sometimes not gone out of the house for weeks following an altercation regarding my dog, I am extremely grateful for this positive and creative solution. Thank you so much."

Rider Cards

Throughout the 2018 pilot project period, Lane Transit District issued 5,953 individual rider cards. Rider cards can indicate a variety of different statuses, such as "honored riders", meaning riders age 65 and older who ride for free, or half fare riders, a program requirement for fixed route services supported with §5307 funds. Lane Transit District goes above and beyond federal minimums[5] for determining half fare eligibility. Criteria includes Medicare recipients, Social Security Income or Disability benefit recipients, Veteran's Administration benefit recipients at 50% or greater disability or non-service connected pension, or an individual with a disability requiring specialized facilities, planning, or design to utilize LTD transportation services. These accommodations can include utilizing lifts or ramps, Braille signage, assistance from a driver, priority seating, travel training, stop announcements, or to accommodate numerous other needs. Certain riders who do not identify with having a disability, for

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[4] http://www.servicedogcentral.org/content/
[5] FTA Circular 9030.1E, "Urbanized Area Formula Program: Program Guidance and Application Instructions"

example a member of the Deaf community may also deemed eligible for a rider card[6]. All riders who use a service animal are considered eligible for half fare.

Rider cards can be used to show fare to a driver, such as by applying monthly fare stickers, or can be used to purchase and use designated fares at half price. Additional endorsements can be reflected on the cards, most commonly indicating that someone may bring an attendant with them who is not charged a fare, or a paw print indicating participation in the service animal pilot program. A new rider card comes with a lanyard, making it easy for riders to show their driver everything needed for them to ride. In particular, for many passengers with disabilities a lanyard can make it easy to transport and display the card without needing to dig through a purse, pocket, or wallet.

A sample rider card featuring a paw print.

Paw Prints

Perhaps more important than what a paw print endorsement is, is what it is not. There is no federally recognized service animal licensing or certification program. Rider cards with paw print endorsements do not purport to be any form of certification, make no claims about the status of any particular animal, and are not useful or transferrable outside of the context of local transit district service.

What paw prints do indicate, is that staff has already inquired about the status of their service animal, and that they do not need to be asked again. It does not imply anything about the behavior of the animal or its handler. However, during the process of receiving a paw print, handlers are made aware that their service animals are held to a behavioral standard. Consistent with behavioral policies

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[6] 49 U.S.C. Chapter 53, 49 CFR Appendix A to Part 609 - Elderly and Handicapped

governing human passengers, this means barking, biting, lunging, being aggressive, or accidents are generally not going to be tolerated while on the bus[7]. A paw print is not a license to misbehave, and does not imply a different behavioral standard than a service animal handler without a paw print should expect.

The intention and spirit of the ADA is to remove barriers for people with disabilities. For that reason, at LTD rider cards in general and paw print endorsements specifically have been made free and voluntary. An individual with a service animal should expect to be welcomed onto a bus whether they have a rider card, paw print, or not. Rider cards and paw print endorsements are incentivized by being free, convenient to obtain, and by adding efficiencies to every ride.

Transit agencies should be cautious to avoid any unnecessary fees or obstacles in obtaining half fare or a service animal endorsement, as it would disproportionately burden people with disabilities. There may be some instances in which a fee can be helpful. For example, while LTD does not charge for a new rider card, or a replacement card with a new endorsement, it does charge a fee for replacing lost or stolen cards. This helps incentivize card retention, as otherwise we noted that some riders would lose cards multiple times per month. We further incentivized retention by giving away lanyards that allowed passengers to carry their rider cards around their neck rather than somewhere more easily lost.

> Driver Feedback:
>
> "Those that participate are proud to show the paw print."

Arbitrary local policies

LTD policy allows any animal on a bus in an enclosed carrier. On LTD property only service animals are allowed outside of a carrier while remaining under the full control of its handler, typically with a leash. While this report focuses on the impacts of service animal policy and procedure, it is important to note the obvious intersections with policies regarding pets and other animals.

Transit agencies typically will be required to allow all passengers to bring a service animal, but subject to State laws they may usually arbitrarily decide how policies address non-service animals. There are distinctions between many kinds of animals – pets, therapy animals, emotional assistance animals, guard dogs, etc[8]. These distinctions may have meaning in other contexts. For example, a landlord may be required to accommodate an emotional assistance animal in a "no pets" apartment. Airlines of course are subject to even more specific regulations via the Air Carrier Access Act. However elsewhere in transit there are generally no such requirements that we accommodate animals that are not service animals. A transit agency may typically choose not to allow pets on board, or may choose to allow

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[7] https://www.ada.gov/regs2010/service_animal_qa.html

[8] Parenti, L., Foreman, A., Meade, B. J., & Wirth, O. (2013). A revised taxonomy of assistance animals. *Journal of rehabilitation research and development*, *50*(6), 745-56.

emotional assistance animals while leashed. A common concern with less restrictive policies is when a non-service animal is aggressive, bites, or attacks another passenger or service animal. Similarly, many people with service animals may prefer a more restrictive policy to minimize the encounters their animal may have with other dogs. Close proximity between even the best behaved animals can invite behavioral problems.[9] Allowing non-service animals outside of carriers increases the risk that all passengers and service animals are asked to undertake when riding.

When developing non-service animal policies, it is important to keep in mind that at the heart of public transit is a commitment to bring people where they need to go. Many public transit riders may not have another affordable transportation option, and may still rely upon their non-service animal in important ways. Emotional Support Animals are typically considered a reasonable modification in a "no pets" apartment precisely because of the intersection between the vital importance of housing and the necessity of an individual to have their emotional support animal. A public transit policy that outright prohibits non-service animals may prevent these people from performing certain daily life activities, or even travelling to see a veterinarian for their animal. On a more practical level, consider that passengers could choose to lie to the transit agency about the status of their animal if they have no other option to travel with their non-service animal. A more inclusive policy can help mitigate risk by encouraging honest participation.

A potential compromise is to allow non-service animals in an enclosed carrier. This minimizes the risk the animal will have negative interactions or injuries involving other people or animals, while still allowing access to public transit as an option. This admittedly may not be an ideal solution for larger non-service animals. Some passengers have found it convenient to utilize a wheeled carrier while boarding, which can either be detached from the wheeled portion or otherwise secured while on the bus.

LTD requires that service animals cannot utilize passenger seating or block aisles or paths of travel. It is important that bus layouts be designed to consider the occasional large dog on board. Simply allowing larger animals to spill into aisleways can create a safety hazard, for example if a passenger using a mobility device is unable to navigate to an exit because it is being blocked by an animal. Similarly, a dog with a nose or tail poking out may inadvertently get run over by a mobility device weighing many hundreds of pounds. LTD typically recommends that a service animal either be on the lap or tucked under the seat of its handler.

Finally, while seemingly obvious LTD has a policy requiring that at all humans and animals behave while on a bus, meaning no barking, biting, growling, lunging, aggression, or accidents while on the bus. We may also be asked to intervene with interpersonal behavioral problems, such as complaints that another passenger won't stop distracting, petting, or attempting to feed another individual's service animal.

> Supervisor Feedback:
>
> "It is a great idea and a good program."

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[9] Richmond, M., CPDT-KA. (March 13, 2013). "5 Things to Know About A Dog's Threshold" *Whole Dog Journal,* (April), 2013

Non-arbitrary policies

Culturally, many in the United States feel that dogs are friends or family, and have strong opinions that can inform or influence policy decisions.[10] Occasionally policy recommendations are being made that while possibly well intentioned, are not consistent with certain bright line regulations. For example, policies should not include size or breed restrictions. Perhaps most commonly, some communities have looked to restrict what are sometimes perceived to be aggressive breeds such as pit bulls.

However, this is also problematic purely from a practical standpoint. Making breed determinations based on appearance alone is unreliable[11]. Further, a dog might be part pit bull, so a community would need to determine how much pit bull was allowable. Lacking paperwork or pedigree, it may be difficult to prove if a dog is or isn't a particular breed, absent genetic testing[12]. Even if genetic testing is required, logistic questions remain such as who will pay for it and whether every dog be subject to this level of scrutiny.

A policy that restricts size may have some foundation in utility but would likely be discriminatory. From a disability perspective, some people need to rely on larger animals as part of the task they have been trained to perform to assist with a disability. For example, someone may have a service animal trained to brace when their handler falls, or pull their wheelchair. These tasks may be of little use or be dangerous with a smaller animal. A wholesale ban on all larger animals would disproportionately impact those with certain disabilities best suited to be accommodated by larger animals.

However, while not recommended there may be some basis for an argument that an animal may be excluded due to a combination of size and capacity restrictions. One of the examples used on ADA.gov is someone wishing to bring two service animals into a restaurant, while only one fits under the table and the other would blocks an aisle. In this case, guidance states it is allowable that "staff may request that one of the dogs be left outside". A counter argument is that while this could be reasonable request at a restaurant, it is not generally practical when someone is boarding a bus. Passengers can be reasonably expect that they can bring more than one service animal, for example one animal might be of a breed suited and trained to smell and detect life threatening allergens, while another is trained to navigate through spaces to find an open seat.

While we cannot generally restrict the number of service animals a passenger may bring on board, transit agencies should assume that bus layouts will need to accommodate passengers bringing at least one larger animal. For reference, a common example amongst transit agencies is having the capacity to

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[10] Wan, M., Kubinyi, E., Miklosi, A., Champagne, F., 2009. A cross-cultural comparison of reports by German Shepherd owners in Hungary and the United States of America. Appl. Anim. Behav. Sci. 121, 206e213.

[11] Hoffman, C. L., Harrison, N., Wolff, L., & Westgarth, C. (2014). Is that dog a pit bull? A cross-country comparison of perceptions of shelter workers regarding breed identification. *Journal of Applied Animal Welfare Science: JAAWS*, *17* (4), 322-339.

[12] Voith, V. L., Ingram, E., Mitsouras, K., & Irizarry, K. (2009). Comparison of Adoption Agency Breed Identification and DNA Breed Identification of Dogs. *Journal of Applied Animal Welfare Science*, *12*(3), 253-262.

reasonably accommodate a service miniature horse, which can typically weigh 150-250 lbs. and stand up to 34" tall[13].

Rider Feedback:

"I have severe social anxiety, having my dog with me makes it more bearable. A very nice driver took the time one day to tell me about it and who to talk to. I would just like to say thank you for the program and for the work you do, I'd be lost if I couldn't have my dog with me, and wouldn't go out near as much. God bless you. Thanks!"

Non-Canine Service Animals

Possibly the most stark difference between DOT and DOJ service animal guidance is the definition of a service animal itself. Starting March 15, 2011, the DOJ has recognized only dogs as service animals under titles II and III of the ADA. However, FTA circular 4710.1 notes that for transit purposes a service animal is a "dog **or other animal** individually trained to work or perform tasks for an individual with a disability" (emphasis added). It further notes that "While most service animals are dogs, DOT's definition recognizes the possibility of other animals."[14]

This puts transit agencies in a challenging position of handling situations where a passenger may make claim to a service animal of questionable species, with little supporting federal guidance. It is clear that transit agencies cannot unilaterally ban non-canine service animals. Certain animals may be more obviously allowable, such as a monkey trained to pick medication up off the ground, or a miniature guide horse. However, the question remains of how a driver should be expected to respond when a passenger says they are bringing a service snake, or service parakeet? While these examples may seem exigent or extreme, they do happen and transit agencies should be prepared to respond when they do.

While there may be little support in the way of literature or established precedent, some speculations can be offered based upon a reasonableness standard. It is likely reasonable for transit agencies to include an extra step of due diligence when evaluating non-canine service animals. Typically this would mean a referral to meet with someone at the transit agency best equipped to make a determination on the animal's status. In many situations it is likely unreasonable to assume that a bus operator can be trained to make an immediate determination for every species of animal that could potentially be boarded. As it is generally assumed allowable to follow a reasonable modification procedure for a service miniature horse, a similar procedure for other non-canine species should typically be followed.

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[13] http://www.amha.org/registration/how-to-measure

[14] Note that this guidance is reversed again for water transportation/passenger vessels, where non-canines are not typically considered service animals.

One additional consideration when evaluating non-canine animals are biological limitations of the species. For example, due to the structure of a reptile's brain a snake may be biologically incapable of being individually trained to reliably perform certain specific tasks to assist someone with a disability. The high metabolism of a parakeet may render it biologically incapable of being housebroken. Care should be taken to ensure that any potentially mitigating circumstances are discussed during a reasonable modification process. Natural or spontaneous animal behaviors may be misinterpreted and are not considered individually trained, specific tasks that assist someone with a disability.

While transit agencies may be understandably reluctant to immediately allow a non-canine service animal, it is important to recognize that there is legitimacy for the reasons why an individual would choose a service animal that isn't a dog. Other service animal species such as miniature horses can be an attractive option because of their long lifespan, if someone is allergic to dogs, or if someone belongs to a religious or cultural background where dogs are considered unclean.

> Driver Feedback:
>
> "I love dogs and really prefer only to question animals that are not following rules."

Training

Training must balance the wide scope of information necessary with what is realistic for operators to retain throughout their daily work. Even individuals familiar with service animal regulations may be surprised to learn that different guidelines apply when in a restaurant, on an airplane, in an apartment, or on a bus. Oregon transit agencies and animal handlers alike can greatly benefit from the "Service and Assistance Animals in Oregon" guidebook[15]. All transit agencies should recognize that they may have State laws that influence local policies, but otherwise should generally rely on guidance from the Federal Transit Administration[16].

The first opportunity an operator typically has to interact with a service animal and handler is in a boarding situation. Operators should be trained to ask two questions, "Is this a service animal?" and "What task is your service animal trained to perform?"

While seemingly simple, the reality is these questions can lead to conflict between bus operators and passengers. Even the best trained bus operators aren't expected to be experts in the nuances of the ADA, and passengers aren't always clear when answering the questions. A typical non-responsive answer to the task question we hear is "Seizures", or "It's for my PTSD". These responses disclose a diagnosis or a disability but don't actually tell us anything about whether their animal performs a trained task to assist them with a disability. For example, someone might say that their dog cuddles up to them, and their presence help mitigate their PTSD symptoms. As the service is provided through their presence

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[15] Harlow, E., & Wilde, K. (2013). *Service and Assistance Animals in Oregon* (1st ed., pp. 1-23, Rep.). Portland, OR: Disability Rights Oregon.
[16] FTA Circular 4710.1, "Americans With Disabilities Act Guidance"

and not a trained task, this typically is considered more consistent with an emotional assistance or companion animal and we would require it to remain in an enclosed carrier. However someone might alternately tell us that as a returning veteran, their animal is trained to scout a room and report back that it is safe before entering, and that this assists them with symptoms of their PTSD. In this case we would thank them for their military service and welcome their service animal without requiring a carrier. In both cases we did not need to know about the PTSD diagnosis, and in fact made different determinations based entirely on what their animal has been trained to do. At the most simple level, people with disabilities can have both pets and service animals, and telling us only about their health status in itself does not help us make a determination about which their animal is.

Bus operators are trained to recognize and address behavioral issues with service animals. Beyond the trained task that a service animal performs, the expectation is that a service animal is trained to be in public spaces, which includes being around other people and animals. A "service animal in training" or "assistance animal trainee"[17] in Oregon is still assumed to have already been trained as a dog and uphold a behavioral standard in public, but is receiving training to perform a specific task to assist someone with a disability.

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Driver Feedback:

"Anything that speeds up the
boarding process is appreciated."
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Untraining

One potential pitfall is for transit agencies to see publications that refer to guidance from the Department of Justice, and assume that it is universally applicable. While FTA does generally assume that DOJ guidance is often concurrent while on the bus, §37.21(c) explicitly notes that for FTA grantees, "The provisions of [Part 37] shall be interpreted in a manner that will make them consistent with applicable Department of Justice regulations. In any case of apparent inconsistency, the provisions of [Part 37] shall prevail", meaning that transit agencies should be aware of and uphold important distinctions between FTA and DOJ guidance.

Many bus operators, passengers, and members of the public may make reasonable assumptions that simply aren't true and require a certain degree of untraining or education to clarify[18]. For example, vests, doctors notes, certifications, licensing, registration, and medical documentation may all have their

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[17] 2017 Oregon Revised Statutes 659A.143

[18] Schoenfeld-Tacher, R., Hellyer, P., Cheung, L., & Kogan, L. (2017). Public Perceptions of Service Dogs, Emotional Support Dogs, and Therapy Dogs. *International journal of environmental research and public health*, *14*(6), 642. doi:10.3390/ijerph14060642

uses, but unnecessarily complicate the only piece of information truly needed when making a service animal determination – that the animal performs a trained task to assist someone with a disability.

Bus operators often benefit from a reminder that anyone can purchase a service animal vest online, and that they, and not a doctor, are making a determination on the service animal's status. Conversely, if a passenger starts disclosing their diagnosis or medical history, they may benefit from a reminder that we are not doctors, but instead only need to know what task their service animal performs. Gentle encouragement to emphasize and simplify what is needed during boarding can often be a helpful relief to all involved.

Special Cases

There are nuances to service animal regulations that can be trained at a bus operator level, but don't necessarily have to be. Operators should at least be made aware to call a supervisor during unusual circumstances if they feel unclear or unsure what to do. There will almost always be an exception to any rule, and it is not necessarily realistic to expect that operators know what to do in every circumstance. Transit agencies have many options, such as following a more formal reasonable modification procedure, working directly with a specific passenger to assist with their situation, or communicating out to all operators about a particular situation.

One example is uncontrolled barking, which is not allowed on LTD buses. Typically if a service animal barks the handler could expect a reminder from an LTD employee that their service animal needs to be under their full control at all times. However, someone might respond that their service animal barked as part of the task it performs to assist them due to a disability. A service animal might bark to remind a handler to take medication, or that it detects an upcoming seizure. In this case the activity is protected, and a transit agency cannot take further action, as the service animal remains under the control of the handler. Operators should have sufficient training to either know how to adequately respond, or to check in with someone who can assist them in these types of circumstances. The danger is in operators knowing the letter of the policy (no barking) but not fully understanding the spirit (allowing service animals to perform their work while under control of their handlers) and taking action accordingly.

Another example is when a service animal is needed to be off-leash. Due to a disability, a passenger may be unable to operate a leash. Alternatively, a handler may need their service animal to be off-leash to perform the task it assists them with. Both of these circumstances are permissible assuming the service animal remains under the full control (typically meaning voice or signal control) of their handler at all times.[19] If a service animal only needs to be off-leash to perform a specific task, it is generally reasonable that it be leashed while not performing that task.

Lying

Untruthfulness does happen when determining a service animal status and is enough of a concern to warrant its own section for consideration. For any number of reasons, passengers may choose to lie and

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[19] https://www.ada.gov/service_animals_2010.htm

misrepresent the status of their pet as a service animal. It is also possible a passenger may incorrectly believe they have a service animal, due to misinformation or an unscrupulous accreditation or certification company.

Transit operators can and do make assumptions about the legitimacy of a service animal independent of the questions they are allowed to ask. Even amongst service animal handlers participating in the paw print program, operators reported they felt slightly less than half, at 44.6%, had a legitimate service animal.

To some degree this is expected, and significant research has already been done to establish implicit association and unconscious biases.[20] What is most important are the actions operators take after establishing these judgments, and it is troublesome that such a low degree of confidence exists for animals that transit agencies are required to board. Transit operators were asked qualitatively how they handled these kinds of disparities, where they felt an animal was not a service animal, but the handler was able to successfully meet the threshold requirements by answering the operator's questions. While responses varied, there were three main themes described below.

- "I let the animal on, and watch their behavior." This is generally the response an agency should train towards. The operator recognizes their responsibility to allow the handler to board with their service animal, and uphold a behavioral standard. However, an unreasonable or unwarranted amount of monitoring of the passenger's animal should be discouraged, particularly in relation to other passengers or animals. For example, a warning to a handler whose service animal is appropriately under their seat, but has their tail sticking into the aisle can be appropriate. In the same circumstances, stopping a bus to begin an argument over blocking the aisle would generally be considered heavy handed. If an operator already holds a bias against an animal or handler, there is a potential that small problems may become magnified. Riders should not feel disproportionately scrutinized because of their disability status.

- "I just let everyone on and ignore them." This attitude is symptomatic of an operator who has given up when faced with the complexities of making service animal determinations. Some operators volunteered that they felt asking any questions was unnecessary or a waste of their time. Others felt that they would get complaints filed against them for asking questions, so it was better just to let everyone ride. While simpler, this does a disservice to the transit agency and other passengers by increasing the risks associated with having obvious non-service animals freely comingle with passengers and service animals. Even experienced handlers with extremely highly trained and specialized service animals report increased risk of behavioral problems when other animals are in close proximity. The worst case scenario for a transit agency is an attack or unprovoked aggression from an animal, where in-vehicle cameras show an operator not doing their due diligence or upholding policy by simply asking about the status of an animal or responding to behavioral issues.

- "I continue to follow up with the passenger." There are legitimate circumstances in which an operator needs to get additional information from a passenger, such as when they do not fully

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[20] *Banaji, Mahzarin R. (2013). Blindspot : hidden biases of good people. New York :Delacorte Press,*

answer questions about the status of their animal. However if a passenger has successfully met the threshold of establishing that their animal is a service animal, it is generally disastrous to continue the conversation in an attempt to "out" details to establish that it is really a non-service animal. Disparate treatment or creating additional barriers can lead to a civil rights violation. If you feel this is not a potential risk from operators in your area, do not underestimate the potential for someone to push the subject despite their best judgment when they feel they are "in the right". Further, operators and passengers may begin to argue over other details, such as fare or timeliness, which can blur into the conversation about the status of their animal.

In short, once a passenger has stated they have a service animal by notifying us that it performs a trained task to assist them with a disability, suspicions of lying or any other inferences or biases must be put aside in favor of allowing the passenger to board with their animal. At that point, ride refusal of the animal can generally only be made by upholding a behavioral standard.

Conflicts

An immediate concern for transit agencies, drivers, and passengers is when conflicts center around a service animal. Perhaps most commonly, conflict can occur when a transit operator legitimately asks a passenger about the status of their animal, most frequently by asking if it is a service animal, and asking what task it is trained to perform. Conflicts can arise whenever there is a misunderstanding regarding either the status or the behavior of an animal when boarding.

From a passenger perspective, handling a service animal often means being asked questions about the status of the animal multiple times per day. Even just on transit, a round trip involving a transfer can mean being asked 8 questions about the animal, every single day. It is therefore not unexpected that a passenger's patience may wear thin at times.

From an operator perspective, passengers may not always give clear answers to their questions about the status of an animal. If a passenger does not clearly and immediately respond with the task that their service animal performs, it can put the operator in a position of choosing between upholding policy and a potentially late departure.

When an operator and a passenger endlessly argue about the status or behavior of an animal, no one wins. This can sometimes be more related to customer service skills than knowledge of the ADA, but an unnecessary departure delay can unfairly draw attention to a specific passenger's disability status and upset all passengers.

Transit agencies often have the advantage of reviewing these altercations after the fact, using in-bus audio and video. One common theme seen in these arguments at LTD that escalates the conflicts is a need on both sides to be right, often talking over one another with completely correct and factual information or citing policies or regulations verbatim. What this doesn't accomplish is getting someone where they need to go. Bus operators should be prepared to bring their best customer service skills to the table, and to stay focused on what is necessary to get back on the road. Passengers can and will at times provide information that isn't necessary or helpful, and it is the responsibility of the operator to

redirect the conversation back to a constructive place. For example, a passenger may cite the non-applicable animal policy of their apartment, or point to the service animal vest they bought online. A long public lecture about transit policy on a crowded bus probably isn't going to help this situation, even if the operator is well intended in trying to provide an educational opportunity. Similarly, a passenger may have a need that is beyond an operator's working experience, such as someone claiming to have an off-leash service ferret that is under their voice control and trained to interrupt harmful behaviors.

A service animal program gives operators an "out" in these situations, by giving them a point of contact to direct questions or concerns in a quiet, low stress setting with dedicated staff, providing consistent service. It lets both operators and passengers know that they will be supported in meeting their needs and helps people get where they need to go, instead of worrying about who is more right.

Potential Challenges

Transit agencies should take special care to ensure that participating service animal handlers are not imparted with privileges or barriers different than non-participants.

Drivers that are particularly eager may become the biggest champions of the program. 72.7% of operators referred at least one passenger for participation in the program. However particular caution should be taken that drivers are referring passengers to a voluntary program, and not suggesting in any way that participation is required or conditional for riding. Quite a bit of qualitative feedback indicated that drivers would like the program to become mandatory, which would generally be considered a violation of the rights of a passenger due to their disability status.

One rider noted they did not like the feeling of being marked by having a paw print endorsement on their rider card, and felt that it drew attention to their disability status. At LTD rider cards have utility beyond the paw print, and it is allowable if someone decides to change their status or participation in the program at any time.

The program may surprisingly reveal hidden biases, which creates new training opportunities either individually or systemically. For example, a small number of drivers noted they felt uncomfortable when someone with a paw print endorsement did not have their service animal with them, or that it was an indication that their animal was not a service animal.

Supervisors notably had the lowest program satisfaction rates of all participant groups, though with a small number of supervisors surveyed, and while still maintaining an overall positive response that the program increased efficiency and reduced conflict.

Many program participants expressed a desire for an expanded program and some sort of attestation about a service animal's behavior. Even with a significant investment in training to the contrary, many employees continued to believe a paw print made a claim about the behavior of an animal. Qualitatively, this often seemed to result from a confusion that tried to link the status and behavior of an animal in some way. It could also be related to feedback from a small number of employees that they would prefer not to have to make any decisions relating to service animals. Employees needed to have the concept reinforced through training that a pet can be perfectly well behaved and that a service animal can exhibit bad behavior.

Statistics

Throughout 2018, Lane Transit District issued nearly 6,000 rider cards for older adults and people with disabilities eligible for half or free fare. Of those, 122 participants volunteered to take part in the service animal pilot program, and a paw print endorsement was added to their rider card. Lane Transit District also employed 197 bus operators who were trained to participate as part of the program. Rider and driver participants were separately surveyed to collect quantitative data on their experiences throughout the program. 15 supervisors were also separately surveyed their opinions of the program.

Passengers were asked these 7 questions via telephone, e-mail, and mail:

1. On a scale of 1 (least helpful) to 10 (most helpful), how would you rate your overall experience with the paw print program?

2. On a scale of 1 (difficult, or terrible) to 10 (easy, or great), how would you rate your experience obtaining a paw print card?

3. Does having a paw print encourage you to ride public transit more often?

4. In your opinion, have paw prints sped up the boarding process?

5. In your opinion, has a paw print decreased the number of conflicts with drivers regarding your service animal's status?

6. How did you first hear about the paw print program?

7. Are there any other comments or experiences you'd be willing to share?

Bus operators where asked similar but separate 7 questions via a fellow driver during breaks and between shifts:

1. On a scale of 1 (least helpful) to 10 (most helpful), how would you rate your overall experience with the paw print program?

2. In your opinion, have paw prints sped up the boarding process?

3. In your opinion, have paw prints decreased the number of conflicts with riders regarding their service animal's status?

4. Out of every 10 passengers that show you a paw print, how many animals have displayed behavioral problems while on the bus?

5. Out of every 10 passengers that show you a paw print, how many do you believe have a legitimate service animal?

6. Have you ever given a rider with an animal a referral for the paw print program?

7. Any other comments or experiences you'd be willing to share?

Supervisors were asked to provide written responses to 4 survey questions:

1. On a scale of 1 (least helpful) to 10 (most helpful), how would you rate your overall experience with the paw print program?

2. In your opinion, have paw prints sped up the boarding process?

3. In your opinion, have paw prints decreased the number of conflicts between riders and operators regarding their service animal's status?

4. Any comments or concerns are welcomed!

We received 47 voluntary survey responses out of 122 voluntary rider participants, 150 voluntary survey responses out of 197 mandatory operator participants, and 15 voluntary survey results out of 15 mandatory supervisor participants.

Comparing a null hypothesis for overall program satisfaction, we should expect to see significance for values above 50% as a benchmark of an average or middling experience, as program participants are generally comparing their experiences directly to those prior to the program initiation. It is important to note that differences between operator and passenger satisfaction rates could also be influenced by one group being voluntary and self-selected, with the other group being mandatory participants. In comparison to future data sets, it is suggested to carefully monitor the total number of voluntary participants as relative to the overall served population.

Even when factoring in standard deviation, overall satisfaction rates are well above middling performance measures for both mandatory and voluntary participants. Overall participation levels for voluntary participants is satisfactory to have a sufficient data set relative to the population size.

Data across all questions suggests high standard deviations, particularly for mandatory participants. Because of the particularly high average satisfaction rates, this suggests that there will typically be a handful of participants (and in particular employees) that may be unsupportive of the program. However, while this sentiment is important to acknowledge, it appears to be overwhelmingly drowned out by the strong support of the majority of drivers and riders.

Passenger Results

92.2% overall program satisfaction rate (37.7% response rate)

Standard deviation = $\sqrt{\sum((x_i - \bar{x})^2/(n-1))}$ = $\sqrt{112.7005/45}$ = 16.0%

Standard error is $s/\sqrt{n}$ = +/- 2.3%
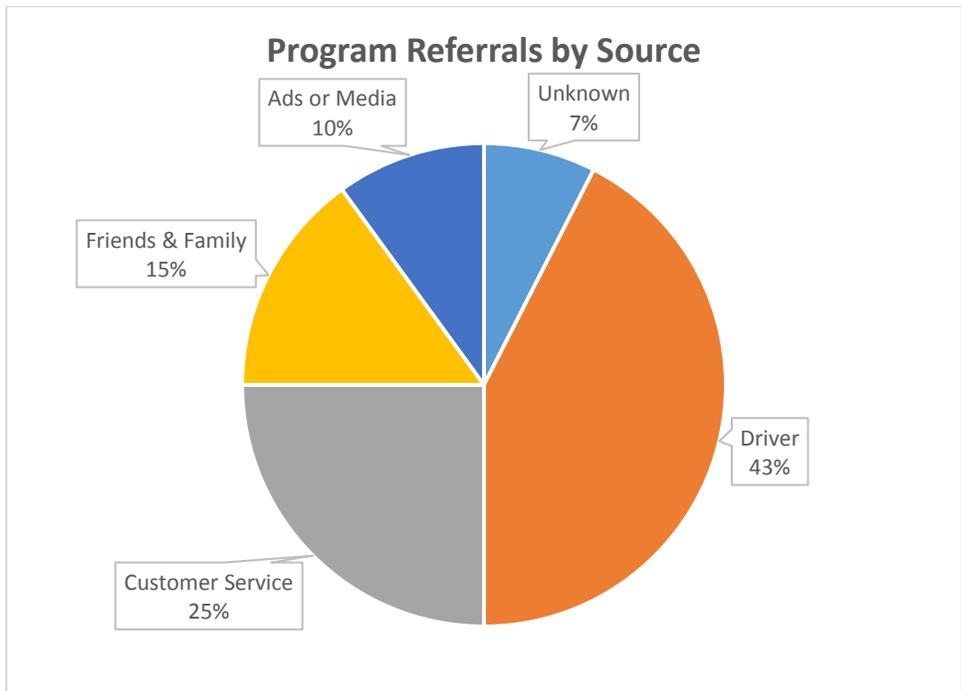
Rider Program Satisfaction Distribution
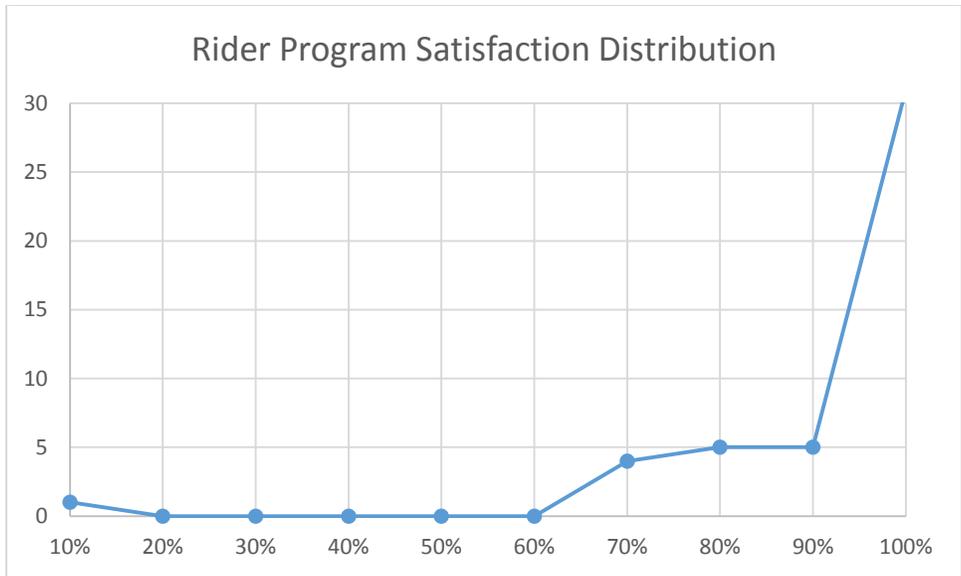
95.1% satisfaction rate with the experience of obtaining a paw print (38.5% response rate)

77.8% report choosing public transit more often (36.9% response rate)

93.3% state boardings have been faster (37.7% response rate)

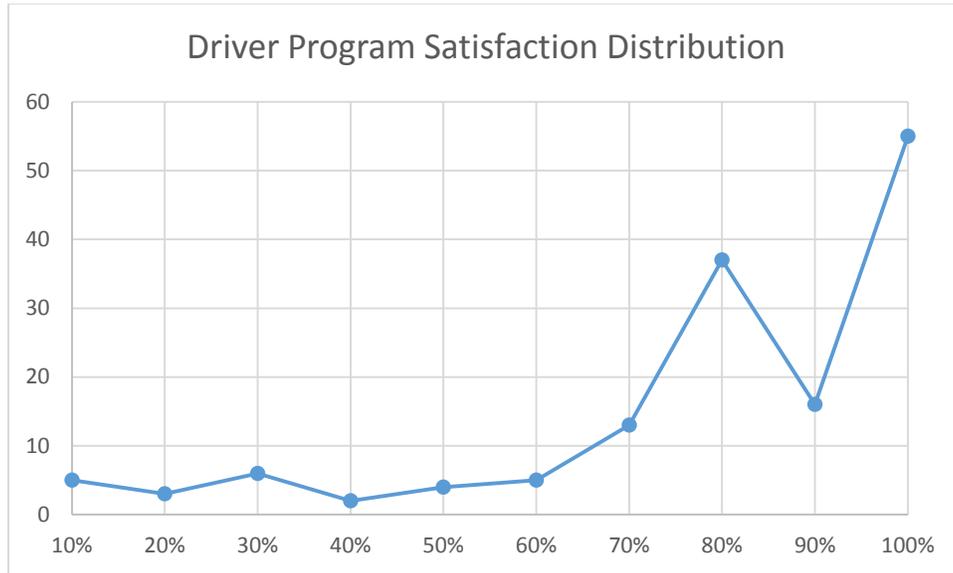91.5% believe conflicts with drivers have decreased (38.5% response rate)

Program Referrals by Source

- Ads or Media 10%
- Unknown 7%
- Friends & Family 15%
- Driver 43%
- Customer Service 25%

Most participants heard about the program from their bus driver.

Operator Results

80.1% overall program satisfaction rate (74.6% response rate)

Standard deviation = $\sqrt{\sum((x_i - \bar{x})^2/(n-1))}$ = $\sqrt{844.0777/146}$ = 24.0%

Standard error is $s/\sqrt{n}$ = +/- 2.0%

Driver Program Satisfaction Distribution

90.7% believe paw prints have sped up boardings (76.1% response rate)

78.0% believe conflicts with passengers have decreased (76.1% response rate)

12.4% of participating service animals displayed behavioral issues to operators (74.6% response rate)

44.6% of participating service animals are believed to be legitimate by operators (74.6% response rate)

72.7% have referred a passenger to participate in the program (76.1% response rate)

Supervisor Results

64.6% overall satisfaction rate (87.5% response rate)

80% believe paw prints have sped up boardings (100% response rate)

73.3% believe conflicts between passengers and operators has decreased (100% response rate)

Conclusions

While still early to draw any substantive conclusions, early indicators do point towards encouraging successes at a local level. An above 80% satisfaction rate from both drivers and riders is significant, particularly for a program in which many participants are very opinionated.

Data from drivers in particular highlighted one specific advantage of the program. All animal handlers that received a paw print endorsement were determined to successfully meet the ADA threshold for a service animal, meaning they were able to describe that their service animal was trained to perform a specific task to assist them due to a disability. As such, they were entitled to board with their service animal. However, despite a relatively low incidence of behavioral problems, drivers reported that they perceived over half of all handlers with paw prints as not having a legitimate service animal. On one side, operators could still choose to allow a service animal to board in situations when they suspect a handler is lying, but is still able to successfully answer questions about the status of their service animal. On the other side, this bias even when unconscious may negatively impact the determinations operators make when evaluating the status of an animal when boarding. By utilizing a paw print, it removes the need for multiple operators to make determinations and minimizes the risk of a decision that could violate the rights of a person with a disability. Instead, these evaluations can be made by staff best positioned to make a determination due to focused training and expertise. It further reinforces and focuses training to uphold a behavioral standard which is independent of the operator's perception of the animal's status. The goal is therefore to have a more consistent boarding experience and a more uniform application of policy, rather than risk different interpretations of what the ADA requires. Participation is incentivized for both riders and drivers by promoting a faster boarding process and reducing conflict.

Next steps could include participation of other transit agencies from within Oregon or eventually nationwide. A larger dataset could help reinforce or improve the conclusions of the report. In particular, different population sizes, geographies, and even modes of transit such as light rail could dramatically change the considerations which are currently limited to the experiences of Lane Transit District. Hopefully this report can serve as the starting point to begin that work.

Seamless Transit Experience

Meeting #2

3 February 2020

OREGON CASCADES WEST

Council of Governments

Project Overview

- Phase **I**
  - Task 1: Expand driver training
  - Task 2: Pilot travel training expansion
- Phase **II**
  - Task 4: Centralized Information Portal
  - Task 5: Real Time Vehicle Information
  - Task 6: Mobile Ticketing Application
- Phase III
  - Task 1: Paratransit management

Stakeholders

- Albany Transit
  - Linn Benton Loop
- Corvallis Transit
- Benton County Transit
- Linn Shuttle
- Lincoln County Transit
- LINX (Lebanon)
- Northwest Oregon Transit Alliance (NWOTA)
- Oregon State University

Decision Making Methodology

- OCWCOG is the applicant and lead on the project
- Intend to use interest based decision making
  - Support it
  - Have reservations but okay with it
  - Have concerns
- If an individual or agency has a concern, it is up to them to describe it and provide potential solutions

Since Last Meeting

- ▶ Engaged with and listened to stakeholders unable to make October kick off meeting

- ▶ Participated in ODOT required coordination meetings

- ▶ Following State of Oregon price agreement updates

- ▶ Prepared Request for Information (RFI) for automatic vehicle location hardware/software

- ▶ Created and updated website

Today

- **Update on Phase I**

- **Discussion on Phase II**
  - Task 4: Centralized Information Portal
    - *Kevin Chambers presentation on statewide state of practice*

  - Task 5: Real Time Vehicle Information
    - *Inventory of existing hardware and vendor demonstration*

  - Task 6: Mobile Ticketing Application
    - *RFP Criteria*

Phase I Update

- Training Communications
- Training Audience and Topics
- One-on-One Travel Training VS. Information Calls
- Paratransit Eligibility

Phase II: Real Time Vehicle Information

▶ How many vehicles do you, or will you, have by 2021?

▶ What type of GPS device, if any, do you have on your vehicles?

▶ Do you have up to date GTFS feeds?

Phase II: Vendor Demonstration

- 2:45—Double Map

- 3:00—Swiftly

- 3:15—Tripshot

- Varying levels of integration with ticketing, dispatch, and public interfaces

- Think about what you want or don't want as we develop the RFP for Automatic Vehicle Locating equipment

Phase II: Mobile Ticketing Application

- What we heard:
  - Integration with Apple/Android pay
  - Ability to select individual agency or regional fare
  - Maintaining equity (i.e. paper tickets)
  - "Ticket book," to be able to pre-purchase tickets
  - Interest in Automatic Passenger Counting
- RFP Criteria
  - Integration with other hardware/software options
  - Demonstrated Regional Value
  - Technical Approach
  - Qualifications

Schedule

- March
  - Marketing materials Update
  - Information Portal Draft
  - Branding
- April
  - AVL Vendor on Board
  - Mobile Ticketing Submission Review
- Summer
  - Roll out AVL/GTFS
- October 1
  - Mobile Ticketing Launch

Funding

- ► ODOT limited timeline on spending
- ► Purchased software/hardware for 2 full years from initial launch
- ► Also need to explore sustainable funding
  - ► Not going to ask for money if we haven't provided proof of concept