



ADA Policy

Policy Number: 0002

Adopted Date: June 16, 2023

Amended: June 26, 2026

ADA Notification, Accessibility, and Complaint Process

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

It is the policy of the Snohomish County Transportation Coalition (Snotrac) that, when viewed in their entirety, services, programs, facilities, and communications provided by Snotrac, directly or by a contracted service provider, are readily accessible and usable to individuals with disabilities to the maximum extent possible, in accordance with 49 CFR 37.105.

For additional information regarding Snotrac's ADA policy or to request this policy in accessible formats, please contact Snotrac's ADA Coordinator at (425) 780-6052 or info@snotrac.org, or visit Snotrac's administration office located at 3201 Smith Ave, Ste 411, Everett WA 98201.

1. Notification of Policy

Snotrac will notify the public of the ADA policy on the website and in writing.

2. Accessibility

Access to buildings, documents, and tools must comply with [Title 42 chapter 126, Equal Opportunity for Individuals with Disabilities](#).

3. Complaint Process

Snotrac is committed to providing safe, reliable, and accessible transportation options for the community. Snotrac clients and customers wishing to file a complaint and/or obtain a copy of the Customer Complaint Policy may contact Snotrac at info@snotrac.org, at (425) 780-6052, or in person at Snotrac's office located at 3201 Smith Ave, Ste 411, Everett WA 98201. The Customer Complaint Form (Attachment A) can be found on our website.

Complaints should be submitted in writing within 180 days of the alleged violation. In addition to being signed by the complainant or by someone authorized to sign on their behalf, the following information should also be included:

- Full name and address of the individual who experienced the violation.
- Day and evening telephone numbers and email address at which the complainant can be reached.
- Name and address of the facility, physical barrier, or person believed to have discriminated.
- Specific location of physical barriers, if any, related to complaint.
- Brief description of the alleged act(s) of discrimination, the dates occurred, and the names of individuals involved.
- Other information believed necessary to support the complaint, including copies of other documents considered relevant.

Receive and acknowledge receipt of complaints

Complaints will be reviewed to determine:

- Whether it involves a service, program, facility, or activity for which Snotrac has oversight or enforcement;
- Whether there is an enough information to support a decision; or
- Whether additional information is needed.

The Snotrac ADA Coordinator will provide the complainant with a notification of acceptance within ten working days from the receipt of the complaint.

Investigate and analyze complaint

Once a complaint is accepted, the Snotrac ADA Coordinator will investigate the merits of the complaint. This investigation should conclude within 60 days. Snotrac maintains a complaint log and each record contains the responses given and the steps taken to resolve the issue. A complaint may be closed for the following reasons:

- Complainant withdraws;
- Complainant does not respond to requests for additional information necessary to process the complaint;
- Complaint was not received within 180 days of the alleged violation; or
- Insufficient information.

Resolve a complaint and communicate

Once the investigation of the complaint concludes, the Snotrac ADA Coordinator will report the findings to the complainant. The report should include:

- Name, address and contact information of the complainant;
- Name and address of the organization or individual alleged to have discriminated;
- Description of the alleged act(s) of discrimination, the dates they occurred and the names of those individuals alleged to be involved;
- Findings related to the alleged act(s) of discrimination based on the investigation, if substantiated and why or why not; and
- Resulting actions that will occur if the alleged issue(s) is/are found to be substantiated.

Please be sure to let the investigating agency know if a specific format of communications is preferred or necessary, such as large print, braille, e-mail, audio, or video recording.

Any individual not satisfied with the response to a complaint related to accessibility to a program, service or activities may appeal for review by the Snotrac ADA Coordinator within 7 calendar days of receipt of the initial written decision from Snotrac. Reconsideration is only permitted if new facts are revealed. A

request for reconsideration will be reviewed and a final decision rendered by the Snotrac ADA Program Coordinator.

Retaliation by Snotrac staff or any other organization or government agency involved in a complaint is strictly prohibited. Any allegations of retaliation will be promptly and fully investigated.

Disability Protections for Snotrac Employees

Excerpted from Personnel Policy Guidelines:

Nondiscrimination Policy

The policy and intent of Snotrac is to provide equal employment and volunteer opportunities for all persons regardless of race, color, religion, national origin, marital status, political affiliation, affectional orientation or gender identity, status with regard to public assistance, disability, sex, or age or any other basis prohibited by local, state or federal law.

Snotrac intends to respond affirmatively in its employment practices and volunteer opportunities. Affirmative action applies to all aspects of employment practices and volunteer opportunities including, but not limited to, recruiting, hiring, placement, promotion, demotion, transfer, training, compensation, benefits, layoff, recall, and termination. Snotrac seeks to do business with organizations that encourage equal employment opportunity.

Reasonable Accommodation

Snotrac is subject to the Americans with Disabilities Act (ADA), which prohibits discrimination against a qualified individual on the basis of disability in regard to job application procedures, hiring, advancement, or discharge of employees, employee compensation, job training, and other terms, conditions, and privileges of employment.

“Disability” in this policy is as defined by the State of Washington RCW 49.60.040 ruling 2007c317. In general, it means the presence of a documented sensory, physical or mental impairment that has substantially limiting effect upon the individual’s ability to perform his or her job, the individual’s ability to apply or be considered for a job, or the individual’s access to equal benefits, privileges, or terms or conditions of employment. A limitation is not substantial if it has only a trivial effect.

A “qualified individual with a disability” means an individual who, with or without reasonable accommodation, can perform the essential functions of the employment position that the individual holds or desires. All Snotrac job descriptions will include a description of the essential functions of each job.

“Reasonable accommodation” is a modification or adjustment to a job, the work environment, the job application process, or the way things are usually done that enables a qualified individual with a disability to perform the essential functions of the job and to enjoy an equal employment opportunity. It is an accommodation that does not impose an Undue Hardship on the operation of the business or pose a direct threat of substantial harm to the health or safety of the individual or others.

Determination of what constitutes “reasonable” must be made on a case-by-case basis and requests for accommodation will be reviewed at the time the request is made. The request form is available.

“Undue Hardship” means an action requiring significant difficulty or expense, when considered in light of the factors set forth in the ADA or other applicable laws.

Anti-Harassment

Snotrac is committed to providing a work environment where all employees are treated with dignity and respect. Discrimination and harassment on the basis of an employee’s race, religion, creed, color, national origin, citizenship, marital status, sex, age, sexual orientation, veteran status, or the presence of a physical, mental or sensory disability, or any other status protected by law will not be tolerated.

Prohibited harassment is verbal or physical conduct that shows hostility toward an individual and includes derogatory comments, slurs, jokes, innuendoes, cartoon, pranks, or physical harassment based on an employee’s protected class membership. Harassment also includes negative actions based on an employee’s participation in activities identified with or promoting the activities of the protected group.

Sexual harassment will not be tolerated. Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature constitute sexual harassment when (1) submission to such conduct is made either explicitly or implicitly a term or condition of employment, (2) submission to or rejection of such conduct is used as the basis for employment decisions, or (3) such conduct has the purpose or effect of unreasonably interfering with an individual’s work or performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment may include a range of subtle and not so subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or request for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual’s body, sexual prowess or sexual deficiencies; leering, catcalls or touching; insulting or obscene comments or gestures; or display or circulation in the workplace of sexually suggestive objects or pictures (including through e-mail); and other physical, verbal or visual conduct of a sexual nature. Sex-based harassment (not involving sexual activity or language) may also constitute discrimination if it is severe or pervasive and directed at employees because of their sex. One example of sex-based harassment is if a male manager yells only at female employees and not males.

Every manager is responsible to ensure that the spirit and intent of the Agency’s goals and harassment policies are achieved. Employees have the right to be free from harassment on the job either from co-workers or management.

Employee Complaints

COMPLAINT PROCEDURE

Snotrac strongly urges the reporting of all incidents of discrimination; harassment; retaliation; codes of conduct violations; legal or ethical breaches, fiscal mismanagement; or other concerns — regardless of the offender's identity or position. Early reporting and intervention have proven to be the most effective method of resolving actual or perceived issues. Prompt reporting of complaints or concerns assure that rapid and constructive action can be taken.

Individuals who believe they are being subjected to conduct prohibited by these Personnel Policy Guidelines and other organizational policies are encouraged, if they feel comfortable in doing so, to promptly advise the offender that the conduct is illegal, inappropriate, offensive and/or unwelcome and request that such conduct stop.

Snotrac has an open door policy. Employees and volunteers should feel free to share their questions, concerns, suggestions, or complaints with their supervisor.

If, for whatever reason, the employee or volunteer does not feel that the supervisor is a suitable person to whom to report the incident, the employee or volunteer should contact the Executive Director. If the allegation involves the Executive Director then the President of the Board of Directors should be contacted.

Snotrac will also maintain an online form for anonymous tips and complaints from employees, volunteers, clients, and the general public that will be monitored by the Executive Director and an appointee of the Board of Directors.

INVESTIGATION

In all instances, a prompt, thorough, fair investigation will take place, giving careful consideration to protect the rights and dignity of all people involved.

The investigation may include individual interviews with the parties involved and, where necessary, with the individuals who may have observed the alleged conduct or may have other relevant knowledge.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation.

Snotrac will take those steps it feels necessary to resolve the problem which may include verbal or written reprimand, suspension, or termination.

RETALIATION IS PROHIBITED

Snotrac prohibits retaliation against any individual who in good faith reports conduct that violates organizational policy or who participates in an investigation of such reports. Retaliation is a serious violation of this policy and will be subject to disciplinary action.

Mobility Management Services

Mobility Management meetings and events take place at accessible facilities. Documents, such as meeting agendas and materials, can be made available in alternative formats upon request. Appropriate staff contact information is publicized in advance for the public to request accommodations. Sample notification:

“Snotrac encourages everyone to participate, regardless of ability. For accommodations or accessibility information, we request you please contact [Organizer Name] at [Phone Number] or [Email] at least two weeks prior to the [event/meeting].”

More information on Snotrac’s Reasonable Accommodation policy can be found in Attachment B.

To request reasonable modification or accessible formats, please contact Snotrac at info@snotrac.org or call (425) 780-6052.

Attachment A
Snotrac Title VI, ADA, and General Complaint Form

Nature of Complaint: ☐ ADA ☐ Title IV ☐ General

Section I:

Name:		
Address:		
Telephone:	Email:	
Accessible Format Requirements?	☐ Large Print	☐ TDD
	☐ Audiotape	☐ Other:

Section II:

Are you filing this complaint on your own behalf? ☐ Yes ☐ No <i>If yes, skip to Section III.</i>
If no, please supply the name and relationship of the person on whose behalf you are filing:
Please explain why you have filed for a third party:
Have you received permission from the third party to file on their behalf? ☐ Yes ☐ No

Section III: TITLE VI ONLY

I believe the discrimination I experienced was based on (check all that apply): ☐ Race ☐ Color ☐ National Origin
Date of incident:
Please explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as the names and contact information for any witnesses (if known).

Signature

Date

Section IV: TITLE VI ONLY

Have you previously filed a complaint with this organization? ☐ Yes ☐ No

Section V: TITLE VI ONLY

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State Court?

☐ Yes ☐ No

If yes, please check all that apply

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

Please provide contact information for the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

Section VI: For ADA or General Complaints

Name of person or program this complaint is against:

For non-Title VI complaints, please use the space below to explain the issue/experience:

Please email this form to info@snotrac.org or mail to:

ATTN: Executive Director
Snotrac
3201 Smith Ave
Everett, WA 98201

Attachment B

Snotrac Mobility Management's Reasonable Accommodation Policy

Purpose: To inform potential attendees of their rights to reasonable accommodation.

Applies to: Any event or meeting hosted by Snotrac Mobility Management that is open to the public.

Policy: Include the following message in all marketing of an external event or meeting. This includes all promotional materials such as emails, flyers, e-newsletters, and calendar invites.

"Snotrac encourages everyone to participate, regardless of ability. For accommodations or accessibility information, we request you please contact [Organizer Name] at [Phone Number] or [Email] at least two weeks prior to the [event/meeting]."

Include this messaging in all marketing materials that advertise the event/meeting and in any reminder emails that are sent out before the accommodation request deadline.

Note: You should be promoting an event/meeting at least one month in advance. However, you will need to modify the notice date depending on how early or late you market the event/meeting. Work with your supervisor to determine how far out to set the deadline for accessibility requests.

All event invitations, emails, flyers, etc., should clearly display what language services, if any, will already be provided. (For instance: "American Sign Language (ASL) interpretation and Communication Access Real-time Translation (CART) will be provided.") Ensure the interpreters are confirmed prior to advertising or consider using language like "ASL interpretation has been requested" in promotional material. This way the interpreters are not considered guaranteed if we cannot find any in time.

Please see Snotrac's ADA Policy for additional guidance on reasonable modification.