



King County

Department of Transportation
Metro Transit Division
Service Development
201 S. Jackson Street
KSC-TR-0426
Seattle, WA 98104-3856

May 3, 2018

Daniel Levy, Director – Chief Civil Rights Programs Officer
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Mr. Levy,

In response to your request for a comprehensive peer review of LACMTA's ADA compliance on its fixed route transportation services, on April 16th, 2018, I participated on your peer review committee as King County Metro's ADA Services Administrator (resume available upon request).

On day one the peer review process consisted of meetings with top level personnel responsible for ADA compliance in legal issues, Metro Accessible Policies, Operations, Bus and Rail Vehicle Configuration, the Mystery Rider Program, Facility Accessibility/Signage Program, ADA Complaint Handling Process, and Community Outreach. The meetings consisted of presentations, discussions, and document reviews, all followed by periods of questions and answers. The committee also conducted one covert in-service observation and evaluation of a coach operator servicing a person in a wheelchair who was a Mystery Rider. On day two the team provided a walk-through of the Operations Central Instruction, Central Maintenance, and the Division 13 – Operations Facilities.

The following policies, procedures, documents, and topics were reviewed:

General Management Policies

- CIV 5 – Metro Civil Rights Policy
- CIV 10 – Oversight of Accessible Services, Programs, and Construction Projects
Metro Civil Rights Policy
- CIV 9 – Providing Transportation Services to Individuals with Disabilities
- Gen 42 – Accessibility complaints handling process

Policies, Procedures, Documents, and Programs

- ✓ Bus Operator Training
- ✓ Bus Operator Rulebook
- ✓ Communications
- ✓ Customer Complaints
- ✓ Construction
- ✓ Vehicle Maintenance
- ✓ Preventative Vehicle Maintenance
- ✓ Mystery Rider Program
- ✓ Bus and Rail Car Configuration

After a comprehensive review of LACMTA's policies and procedures regarding ADA compliance for its fixed route transportation services, it is my opinion that the LACMTA is in compliance in all areas reviewed. It is my opinion that LACMTA are leaders in the industry for taking its proactive approach to eliminating barriers that deny travel opportunities for riders with disabilities.

The only recommendation I would offer is to add a Notice & Grievance Procedure to your website in accordance with the administrative requirements under Title II of the Americans with Disabilities Act. These requirements are identified at <https://www.ada.gov/pcatoolkit/chap2toolkit.htm>.

Lastly, I would like to thank LACMTA for providing this opportunity to review its ADA policies and procedures. The response to the Gaddy case has been effective and handled in an efficient manner. Congratulations to your team for setting the tone for other transit agencies to follow.

Sincerely,



Dion A. Graham Sr.

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Enclosures