

Coralville Transit's Reasonable Modification Procedures

The US DOT issued a Final Rule under the American Disability Act (ADA) and Section 504 of the Rehabilitation Act of 1973 and can be found at <http://www.gpo.gov/fdsys/pkg/FR-2015-03-13/pdf/2015-05646.pdf>. Per this final rule, the Coralville Transit is required to make reasonable modifications or accommodations to policies, practices and procedures to ensure individuals with disabilities have equal access to its transit programs and services (fixed-route service and ADA Paratransit service). *"The real-world effect will be that the nature of an individuals' disability cannot preclude a public transit entity from providing full access to their service unless some exception applies."*

Therefore, Coralville Transit will consider requests for reasonable modifications so that individuals with disabilities can have equal access to our fixed route and ADA Paratransit services as follows:

1. **Modification Requests Submittals:** The individual requesting the modification will describe what they need in order to use Coralville Transit's fixed route or ADA Paratransit service. Individuals should state their impending trip date within their request, if possible. Coralville Transit can take up to 21 days to process ADA applications and any ADA Reasonable Accommodation requests.
 - a. Requests can be made directly to Coralville Transit's Director, Vicky Robrock, who is designated as the responsible employee to approve/deny pending reasonable modification requests. Please call 319-248-1790 or email vrobrock@ci.coralville.ia.us.
 - b. Requests can be made during the ADA Paratransit eligibility process.
 - c. Requests can be made when a passenger schedules their trip for ADA Paratransit service through Coralville Transit's subcontractor, Johnson County SEATS.
 - d. Requests can be made through general customer service inquiries by calling Coralville Transit at 319-248-1790.
 - e. Requests can be made through the customer comment/complaint process. Customer comment procedures are documented in the Customer Comment Policy www.coralville.org/transit and may be used to address reasonable modifications.
2. **Designated Responsible Employee:** Coralville Transit's Director, Vicky Robrock is designated as the responsible employee to approve/deny pending reasonable modification requests.

Vicky Robrock, Director
900 10th Street
Coralville, IA 52241
319-248-1790
vrobrock@ci.coralville.ia.us

Coralville Transit is committed to providing public transit service to all the general public including those individuals with disabilities. If you are an individual with a disability and believe an accommodation or modification in Coralville Transit's services, policies or programs would allow you to access Coralville Transit's services, please contact Coralville Transit's Director above via phone or email and describe what is needed to be modified in order for you to utilize Coralville Transit services.

3. **Use of Term Reasonable Modification Not Required:** The individual requesting modification is not required to use the term "reasonable modification" when making a request. General complaints concerning issues in accessing transit service or general information requests for modifications in service due to an individual's disability would all be directed to Coralville Transit's Director as part of the general complaint process. Any suggested request for modification by an individual with a disability determined through a complaint investigation would also be forwarded to Coralville Transit's Director, Vicky Robrock.
4. **Requests In Advance:** Whenever feasible, requests for modifications will be made and determined in advance, before Coralville Transit or its subcontractor (Johnson County SEATS) are expected to provide the modified service. Individuals should state their impending trip date within their request. However, this determination prior to service may not always be possible.

Depending on the complexity of the request and if any financial assistance is needed to grant the request, additional Coralville Transit administrative/operational staff (fixed-route or ADA Paratransit service) could also be involved in providing more information for any modification approval/denial determinations.

5. **Requests During Transit Trip:** Where a request for modification cannot practicably be made and determined in advance, operating personnel will make a determination of whether the modification should be provided at the time of the request. If necessary, operators will consult with Coralville Transit Dispatch and the Director or Supervisor before making a determination to deny the request. Any denials for modifications not granted in fixed route service shall be written up as an incident by the driver and forwarded to Vicky Robrock to officially track the denial as stated in #9 (following page).
6. **Reasonable Accommodation Approvals:** Coralville Transit's fixed-route drivers or ADA Paratransit drivers are not expected to retain knowledge of each specific passenger's accommodation. Any approved modification for a passenger with a disability shall be issued a Reasonable Accommodation card they can carry/show to drivers of Coralville Transit's services. Furthermore, any granted reasonable accommodation for ADA Paratransit would be listed within the drivers' instructions when picking up the passenger. Additionally, Coralville Transit Dispatch will also have a listing of any passengers with approved reasonable accommodation(s). Coralville Transit can take up to 21 days to process ADA application requests. Reasonable Accommodation requests can take up to the same 21 days to process.

7. **Grounds For Denial:** Requests for modifications of policies and practices may be denied only on one or more of the following grounds:
 - a. Granting the request would fundamentally alter the nature of Coralville Transit service, programs, or activities
 - b. Granting the request would create a direct threat to the health or safety of others
 - c. Without the requested modification, the individual with a disability is able to fully use Coralville Transit's fixed route or ADA Paratransit services, programs, or activities for their intended purpose
 - d. Results in an undue financial and administrative burden

8. **Other Actions Prior to Official Denial:** Any denials of formal requests prior to the trip would be confirmed with Coralville Transit's Director to ensure no other accommodations could be made to ensure the individual received transit service.

In any case in which Coralville Transit denies a request for a reasonable modification as requested by the passenger, Coralville transit will take, to the maximum extent possible, any other actions (that would not result in a direct threat or fundamental alteration) to ensure that the individual with a disability receives the services or benefit provided by Coralville Transit.

9. **Reasonable Modification Denials:** Any denials for reasonable accommodation by Coralville Transit and/or its subcontractors will be promptly communicated via written letter and/or e-mail to the individual requesting the accommodation including the reasons for the denial.

All denials will be logged/maintained for reporting purposes to the Federal Transit Administration upon request. Coralville Transit's ADA Paratransit subcontractor (Johnson County SEATS) will forward any reasonable accommodation denials regarding Coralville Transit's ADA Paratransit service, along with the reason for the denial, to Vicky Robrock, Director at vrobrock@ci.coralville.ia.us.

10. **Decisions Guided by 49 CFR Appendix E:** In determining whether to grant a requested modification, Coralville Transit will be guided by the provisions of United States Department of Transportation 49 CFR Appendix E to Part 37.169. (<http://www.gpo.gov/fdsys/pkg/FR-2015-03-13/pdf/2015-05646.pdf> - pages 13261-13263)

11. **Procedures Availability:** Coralville Transit's complaint procedures and reasonable accommodation procedures are available on Coralville Transit's website at www.coralville.org/transit or by an individual's request to Coralville Transit. For a copy of these procedures, please call Coralville Transit at 319-248-1790 or e-mail vrobrock@ci.coralville.ia.us and request these procedures be sent via mail or click the links below for immediate access:

- **Complaint Procedures:** www.coralville.org/transit
- **Reasonable Accommodation Procedures:** www.coralville.org/transit