**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 which takes effect on July 13, 2015, and can be found at <http://www.gpo.gov/fdsys/pkg/FR>‐2015‐03‐13/pdf/2015‐05646.pdf. Per this final rule, the ECICOG (CorridorRides) Public Transit system is required to make reasonable modifications or accommodations to our policies and practices to ensure individuals with disabilities have equal access to ECICOG’s transit programs and services.

Beginning October 1, 2016, ECICOG will consider requests for reasonable modifications so individuals with disabilities can have equal access to Demand Response services as follows:

1. **Modification Requests Submittals:** An individual requesting a modification will describe what they need in order to use ECICOG’s service. Individuals should state their impending trip date within their request, if possible. ECICOG can take up to 21 days to process ADA Reasonable Accommodation request.
   1. Requests can be made by emailing [brock.grenis@ecicog](mailto:brock.grenis@ecicog) or by calling ECICOG at 319-365-9941 ext. 137
2. **Designated Responsible Employee:** ECICOG’s Transit Administrator/Planner, Brock Grenis, is designated as the responsible employee to approve/deny pending reasonable modification requests.

# Brock Grenis; Transit Administrator

# 700 16 St NE Suite 301

**Cedar Rapids, Iowa 52402** [**brockgrenis@ecicog.org**](mailto:brockgrenis@ecicog.org%20) **or**

**(319) 365-9941 ext. 137**

ECICOG 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 ECICOG’s services, policies or programs would allow you to access ECICOG’s transit services, please contact Brock Grenis, via phone, letter or email and describe what is needed to be modified in order for you to use ECICOG services.

1. **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 should be directed to ECICOG’s Transit Administrator, as part of the general complaint process.
2. **Requests In Advance:** Whenever feasible, requests for modifications should be made and determined in advance, before ECICOG is expected to provide the modified service. Individuals should state their impending trip date with their request.

Depending on the complexity of the request and if any financial assistance is needed to grant the request, additional ECICOG administrative/operational staff could also be involved in providing more information for any modification approval/denial determinations.

1. **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, subcontractor operators will consult with ECICOG before making a determination to deny the request. Any denials for modifications that cannot be granted shall be written up as an incident by the driver to forward to the ECICOG Transit Administrator for official documentation.
2. **Reasonable Accommodation Approvals:** Any approved modification for a passenger with a disability shall be noted, and printed on the driver instructions (schedule) when picking up the passenger. It can take up to 21 days for ECICOG to process Reasonable Modifications.

All ECICOG subcontractors will have access to approved Reasonable Modifications.

1. **Grounds For Denial:** Requests for modifications of policies and practices may be denied on one or more of the following grounds:
   1. Granting the request would fundamentally alter the nature of ECICOG’s Transit service, programs, or activities
   2. Granting the request would create a direct threat to the health or safety of others
   3. Without the requested modification, the individual with a disability is able to fully use ECICOG’s services, programs, or activities for their intended purpose
   4. ~~Results in an undue financial and administrative burden~~
2. **Other Actions Prior to Official Denial:** Any denials of formal requests prior to the trip would be confirmed with ECICOG’s Executive Director to ensure no other accommodations could be made to allow the individual to receive transit service.

In any case in which ECICOG denies a request for a reasonable modification as requested by the passenger, ECICOG 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 benefits provided by ECICOG.

1. **Reasonable Modification Denials:** Any denials for reasonable accommodation by ECICOG 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, including reasoning, will be documented for reporting purposes to the Federal Transit Administration upon request.

1. **Decisions Guided by 49 CFR Appendix E:** In determining whether to grant a requested modification, ECICOG 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)
2. **Procedures Availability:** ECICOG’s complaint and reasonable accommodation procedures are available on ECICOG’s website at www.ECICOG.org or by an individual’s request to ECICOG. For a copy of these procedures, please call ECICOG at (319) 365-9941 ext. 137 or e‐mail [brock.grenis@ecicog.org](mailto:brock.grenis@ecicog.org%20) and request these procedures be sent via mail, fax or email.

Adopted September 29, 2016