

# **Reasonable Modification Policy & Procedure**

## Policy

COAST will make reasonable modifications/accommodations to policies, practices, and procedures to avoid discrimination and ensure that their programs are accessible to individuals with disabilities.

# **Procedures for Accommodating Reasonable Modification**

1. All requests for reasonable modification (fixed route, paratransit, or facilities) will be processed in the following manner. Requests may be submitted via e-mail to <u>info@coastbus.org</u>, or written mail to:

COAST Attn: Customer Service 42 Sumner Drive Dover, NH 03820

Or by phone at (603) 743-5777

- 2. All requests will be logged into a Reasonable Modification/Accommodation spreadsheet noting the requestor's name, date, contact information, and specific modification request being made.
- 3. Information regarding requesting reasonable modifications will be available on the organization's website (<u>www.coastbus.org</u>) as well as within various printed materials normally provided by COAST (i.e. riders guides, notices).
- 4. Individuals requesting modifications will be asked to supply sufficient detail within the request so that COAST staff may effectively evaluate the request. Individuals are not required to use the term "reasonable modification" when requesting modifications or accommodations.
- 5. Whenever feasible, requests for modifications shall be made in advance, before the requested modification is expected to be provided in service. COAST acknowledges that, due to the unpredictable nature of transportation, some requests for reasonable modification may be made while in transit. As such, operating personnel shall make a determination of whether the modification should be provided at that time.
- 6. All requests for modifications (reasonable or otherwise) will be assigned to the COAST Operations Personnel Manager for review and evaluation. Prior to determination, the Operations Personnel Manager will consult with COAST operations staff regarding requests for reasonable modification.
- 7. Note that some requests for reasonable accommodations may be submitted during the paratransit eligibility process or through other customer service inquiries, and as such, operating personnel are trained and are empowered to determine whether

the request should be granted at the time of the request or whether the request needs to be escalated to operations/management before making a determination to grant or deny the request.

8. Training regarding these procedures will be provided to COAST staff who interact with the public; specifically, office assistants, dispatchers, schedulers and supervisors.

All reasonable modification requests will be acknowledged within 3 business days of receipt. The resolution and response to the person who submitted a request will be made timely, within 15 business days, and the response must explain the reasons for the resolution. The response must be documented in the Reasonable Modification/Accommodation log

#### **Complaint Response Procedures**

1. Complaints may be submitted via email to info@coastbus.org , or written mail to: COAST

Attn: Customer Service 42 Sumner Drive Dover, NH 03820 or by phone at (603) 743-5777.

- 2. All complaints will be logged into a Reasonable Modification/Accommodation spreadsheet noting the complainant name, date, contact information and specific complaint being made as well as the original request for modification associated with the complaint.
- 3. All complaints will be reviewed by the Complaints Resolution Officer prior to discussing with Director of Operations & Executive Director.
- 4. All complaints will be acknowledged within 3 business days of receipt. The resolution and response will be made timely, within 15 business days, and the response must explain the reasons for the determination. The response must be documented in the Reasonable Modification/Accommodation log, referencing the original request for modification. Any complaint responses requiring more than 15 business days for resolution must be reviewed by the Executive Director and documented as to why the resolution requires additional time for full resolution.

#### **Reasonable Modification Request Point of Contact**

The point of contact for Reasonable Modification Requests at COAST is:

Miriam Pereira, Operations Personnel Manager (603) 743-5777 ext. 119 mpereira@coastbus.org

Requests may be reviewed by the following COAST staff: Fixed Route Supervisor, Director of Operations, Director of HR & Compliance

# **Denying Request for Modification**

Requests for modification of COAST's policies and practices may be denied only on one or more of the following grounds:

- Granting the request would fundamentally alter the nature of COAST's services, programs, or activities;
- Granting the request would create a direct threat to the health or safety of others (including drivers and other passengers, but not including the requesting party);
- Without the requested modification, the individual with a disability is able to fully use COAST'S services, programs, or activities for their intended purpose; or
- In the case of recipients of federal financial assistance, granting the request would cause an undue financial and administrative burden.
- If COAST denies a request for a reasonable modification, COAST shall 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 COAST.