



POLICY AND PROCEDURE	
SUBJECT: Reasonable Modification Policy	STANDARD: AMERICANS WITH DISABILITIES ACT (ADA) REASONABLE MODIFICATION POLICY (Adopted July 2015)
EFFECTIVE DATE:	Rev Date: 2/9/23

Background

On March 13, 2015, as part of the Federal Register Vol. 80, No. 49 (80FR13253), the Federal Department of Transportation (DOT) issued a Final Rule effecting 49 CFR Parts 27 and 37: Transportation for Individuals with Disabilities; Reasonable Modification of Policies and practices. This final rule stemmed from a prior Notice of Proposed Rule Making (NPRM) issued February 27, 2006 (71 FR 9761).

The purpose behind this final rule is:

“...specifically to provide that transportation entities are required to make reasonable modifications/accommodations to policies, practices, and procedures to avoid discrimination and ensure that their programs are accessible to individuals with disabilities.”

POLICY STATEMENT

- Wilf Transport will make reasonable accommodations in policies, practices, or procedures when necessary to avoid discrimination on the basis of disability unless Wilf Transport can demonstrate that making the accommodations would fundamentally alter the nature of the service, program, activity, or result in an undue financial and administrative burden.
- When considering changes to transportation services, Wilf Transport shall consider the most integrated setting appropriate for individuals with disabilities. However, Wilf Transport can refuse to provide service to an individual that engages in violent, seriously disruptive, or illegal conduct, or represents a direct threat to the health or safety of others.
- Wilf Transport shall not refuse to provide service to an individual with disabilities solely because the individual’s disability results in appearance or involuntary behavior that may offend, annoy, or inconvenience employees of the entity or other persons.



POLICY INTERPRETATION AND IMPLEMENTATION

All requests for reasonable modification will be processed in the following manner.

- Requests may be submitted by email at bking@wilfcampus.org, written mail to Wilf Transport, 354 DeMott Lane, Somerset, NJ 08873, Attn: Director of Transportation, or by phone at 732-649-3502.
- All requests will be logged into a Reasonable Modification/Accommodation log noting the requestors name, date, contact information and specific modification request being made.
- Information regarding requesting reasonable modifications will be available on the Wilf Transport website www.wilfcampus.org/transport/
- Riders must inform the Wilf Transport, inc. of the need and specific type of additional assistance requested at the time ride reservation is made.
- Individuals requesting modifications will be asked to supply sufficient detail within the request so that agency staff may effectively evaluate the request. Individuals are not required to use the term “reasonable modification” when requesting modifications or accommodations.
- Whenever feasible, requests for modifications shall be made in advance before the requested modification is expected to be provided in service. Wilf Transport 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.
- All requests for modifications (reasonable or otherwise) will be assigned to the agency Point of Contact (POC) for review and evaluation. The POC for these requests will be the Director of Transportation. Prior to determination, the POC will consult with operations staff regarding requests for reasonable modification.
- Reservationist will advise Dispatcher of the specific rider need/request. Dispatcher will log the information within the client information system and determine the resources required to accommodate rider.
- The Dispatcher will evaluate the request and report to the **Director of Transportation** whether the request is reasonable to perform.
- If the **Director of Transportation** deems the service requested to be unreasonable to perform or to repeat on a regular basis, he/she must cite specific reasoning to support the finding and inform the staff.
- If the **Director of Transportation** deems the service requested to be unreasonable to perform or to repeat on a regular basis, the rider must be so informed via phone call at least 48 hours before the requested/scheduled trip. The finding must also be communicated to the rider expeditiously by written correspondence.
- Riders may appeal any such decisions by following established ADA grievance procedures.



WILF TRANSPORT
at the Wilf Campus for Senior Living

- All reasonable modification requests will be acknowledged within three 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. Any requests requiring more than 15 business days to resolve must be reviewed by the Director of Transportation and documented as to why the resolution requires additional time for full resolution.
- A Complainant may also file a complaint with the US Department of Transportation by contacting the
- Department at **US Department of Transportation, Office of Civil Rights,**

Federal Transit Administration Office of Civil Rights

**Attention:
Complaint Team
East Building, 5th
Floor – TCR 1200
New Jersey Avenue,
SE Washington, DC
20590**

Responsibility: Executive Director

Review/	SIGNATURE	DATE