

CCCT'S ADA POLICY REGARDING REQUESTS FOR REASONABLE MODIFICATION

NOTICE TO THE PUBLIC

CCCT values all of their customers and will strive to ensure their customers, in particular, those with disabilities' needs are considered when developing fixed route bus services and stops, passenger amenities, and when procuring vehicles and equipment. CCCT's customers who utilize their ADA complementary paratransit service are provided with door to door service vs curb to curb in order to better serve their needs.

WHAT IS A REASONABLE MODIFICATION?

To ensure that programs and services are accessible to customers with a disability, an individual may request that a modification to CCCT's public transit services be made in order to allow them to access and utilize the services.

There are no restrictions on when a customer can request a reasonable modification although CCCT supports and encourages customers to place a written request as soon as possible.

EXCEPTIONS

Reasonable modification requests to CCCT must consider any and all requests for reasonable modifications but shall take into account the following exceptions:

Reasonable modifications –

- Will not place an undue financial and/or administrative burden on CCCT and/or their transportation contractors;
- Will not constitute a fundamental alteration of CCCT's current transportation services, programs or activities;
- Cannot cause a direct threat to the health or safety of others;
- Cannot adversely affect the service provided to other CCCT customers;
- Cannot jeopardize the functionality or use of equipment used to provide CCCT's transit services; and
- May not be approved if the individual with a disability is still able to fully use CCCT's services, programs, or activities for their intended purpose without the requested modification.

PUBLIC REQUEST PROCESS

Whenever feasible, requests for modifications should be made in advance. This is particularly appropriate where a permanent or long term condition or barrier is the basis for the request. In the ADA paratransit context, requests can be made in conjunction with CCCT's ADA complementary paratransit service eligibility process.

CCCT's process for public submittals of requests for reasonable modifications is as follows:

1. Requests should be as specific as possible and include information on why the requested modification is needed in order to allow the individual to use CCCT's services.
2. Requests should be made in writing or by email, but CCCT will accept a request by phone if needed. Requests should be directed to Executive Director, 1060 Lehigh Street, Allentown, PA 18103 or ccctinfo@lantabus-pa.gov.
3. If a phone request is made and LANTA Executive Director is unavailable, the request will be directed to a designee. Phone requests to CCCT must be made during normal business days and hours of operations of CCCT's administrative offices (currently Monday-Friday, 8:30 AM to 4:30 PM).
4. "On-the-spot" requests will be accepted for circumstances that may arise while utilizing CCCT's transportation services by making a request to the driver. Such requests should be made as soon as the circumstance is made known to the requestor. The driver may make the determination or request a decision of a supervisor dependent upon the situation.

All requests/documentation shall be maintained in a designated file at CCCT's administrative offices for a minimum of five (5) years from date of request.

REQUEST DENIALS/PROTESTS

If a request for reasonable modification is denied, the requester has the right to protest the decision by following CCCT's ADA protest procedures. Copies are available upon request. Also, a copy of the ADA protest procedures will be included with the written decision of denial. CCCT will take, to the maximum extent possible, any other actions that may be available to them to ensure that the individual with a disability receives the services or benefits provided by CCCT that would not result in a direct threat or fundamental alteration.

REFUSAL OF SERVICE & NON-DISCRIMINATION

CCCT can refuse to provide service to an individual with disabilities if that individual engages in violent, seriously disruptive, or illegal conduct, or represents a direct threat to the health or safety of others. However, CCCT will not refuse to provide service to an individual with a disability solely because the individual's disability results in an appearance or behavior that may offend, annoy, or inconvenience CCCT staff/employees or other persons.

The reasonable modification process and use information will be made readily available to the public. ADA-accessible formats will be provided upon request.