

## **ADA POLICY**

### **Alger Transit Authority Revised 3.23.22**

#### **ADA COMPLAINT AND REASONABLE MODIFICATION POLICY**

Title II and III of the Americans with Disabilities Act of 1990 (ADA) provides that no entity shall discriminate against an individual with a disability in connection with the provision of transportation services. Title II of the ADA prohibits state and local governments from discriminating against people with disabilities. Title III establishes accessibility requirements for places of public accommodation. The law sets forth specific public transit requirements for vehicle and facility accessibility and the provision of service, including access to fixed route bus and complementary paratransit service. Alger Transit Authority a/k/a ALTRAN is committed to providing safe and reliable transportation to all people without discrimination.

The attached flyer (Attachment A) will be posted in all transit agency buses, facilities, and websites.

#### **ADA COMPLAINTS**

If the ALTRAN receives a complaint regarding discrimination against an individual under the ADA, we will respond within 30-days of receiving the complaint and will work to resolve the issue with the complainant as quickly as possible. This may involve legal assistance and/or mediation. We will document the entire process, including the resolution, and notify the Michigan Department of Transportation (MDOT) Office of Passenger Transportation (OPT). We will keep the complaint and all related documents on file for at least one year. We will keep a summary of all complaints filed for at least five years. Records will be made available to MDOT OPT upon request.

#### **What information should my ADA complaint include?**

Your written ADA complaint should provide the following information:

1. Your full name, address, telephone number, and e-mail address where we can reach you during the day and evening.
2. The name of the party discriminated against, if known.
3. The name of the person you believe committed the discrimination, if known.
4. A brief description of the alleged discrimination and the dates they occurred.
5. Other information you feel is necessary to support your complaint, including copies (not originals) of relevant documents.
6. Information about how to communicate with you effectively. Please let us know if you want written communications in a specific format (e.g., large print, Braille, electronic documents).

To guide you in providing the requested information, you may use the attached ADA complaint form. (Attachment B)

## **How do I file an ADA complaint by email?**

Include all of the information listed above, either in the body of the email or in an attachment. Attach relevant documents to your email. Send your complaint to ALTRAN at [altrandirector@jamadots.com](mailto:altrandirector@jamadots.com). You will receive a reply email confirming that your complaint has been received within 48 business hours. Please keep a copy of your complaint and the reply email for your records. If you do not receive a reply email, please contact the ADA Coordinator at Altran at 906-387-4845, Ext.2.

## **What happens after my complaint is received?**

After the complaint is received, we will inform you of our action, which may include:

1. Contacting you for additional information or copies of relevant documents.
2. Working with you to resolve the issue.
3. Referring your complaint for possible resolution through the U.S. Department of Justice ADA Mediation Program.
4. Referring your complaint to another federal agency with responsibility for the types of issues you have raised.

## **How can I find out the status of my complaint?**

We will review each complaint carefully. If you have not heard from us within three weeks, please contact the ADA Coordinator at Altran at 906-387-4845, Ext.2.

## **REASONABLE MODIFICATIONS**

Public agencies that provide designated public transportation shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability or to provide program accessibility to their services. This requirement applies to the means public entities use to meet their obligations under all provisions of the law.

In choosing among alternatives for meeting nondiscrimination and accessibility requirements with respect to new, altered, or existing facilities, or designated or specified transportation services, ALTRAN shall give priority to those methods that offer services, programs, and activities to qualified individuals with disabilities in the most integrated setting appropriate to the needs of individuals with disabilities.

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

1. Granting the request would fundamentally alter the nature of the agency's services, 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 still able to fully use the entity's services, programs, or activities for their intended purpose.

Basic process requirements that must be met are:

1. Information on the reasonable modification process must be readily available to the public and must be readily accessible
2. Advance notice can be required if feasible. Flexibility is also needed to handle requests that are only practicable on the spot.
3. Individuals requesting modifications are not required to use the term “reasonable modification”.

### **What information should my reasonable modification request include?**

1. Your full name, address, telephone number, and e-mail address where we can reach you during the day and evening.
2. The name of the party discriminated against, if known.
3. If the request is being made by someone else on behalf of the rider, please provide the advocate’s name, relationship to the rider, and telephone number:
4. A description of the rider’s disability or disabilities.
5. The service policy or procedure that may need to be modified to allow the rider full access to the transit services provided.
6. How the current service policy or program prevents the rider from using transit service.
7. A description of the specific modification to the current service policy or procedure that you are requesting.
8. Copies (not originals) of any required documentation of disability.

To guide you in providing the requested information, you may use the attached ADA reasonable modification request form. (Attachment C)

### **How do I request reasonable modification by email?**

Include all of the information listed above, either in the body of the email or in an attachment. Attach relevant documents to your email. Send your request to the ADA Coordinator at [altrandirector@jamadots.com](mailto:altrandirector@jamadots.com). You will receive a reply email confirming that your request has been received within 48 business hours. Please keep a copy of your request and the reply email for your records. If you do not receive a reply email, please contact the ADA Coordinator at 906-387-4845, Ext. 2.

### **What happens after my request is received?**

After the request is received, the ADA Coordinator at ALTRAN will provide a written response of approval or denial within seven days of its receipt.

### **How can I find out the status of my request?**

We will review each request carefully. If you have not heard from us within seven days, please contact us at the ADA Coordinator at 906-387-4845, Ext. 2.

## Alger Transit Authority

### Procedure to File a Complaint or Request Reasonable Modification Under the Americans with Disabilities Act (ADA)

If you believe you or another person has been discriminated against under Title II and III of the American Disability Act of 1990 by Alger Transit Authority a/k/a ALTRAN or one of our employees, you can file a complaint, or alternatively, request reasonable modification, by mail, fax, or email at:

Paige Eaton - ADA coordinator  
[altrandirector@jamadots.com](mailto:altrandirector@jamadots.com)  
PO Box 69  
Munising, MI 49862  
Fax: 906-387-2963

**Take the first step:** Before filing your complaint or request, contact the ALTRAN's ADA Coordinator to discuss your concerns. They can look into the issue and try to come up with an acceptable resolution to the situation.

You may file a complaint or request a reasonable modification in writing with ALTRAN using the following procedures:

1. File a written complaint with ALTRAN as soon as possible, but no later than 180 calendar days after the alleged violation. Requests for reasonable medication may be filed at any time.
2. The written complaint or modification request should be submitted by the grievant and/or their designee.
3. Alternative means of filing complaints and requesting modifications, such as a personal interview or a tape recording, will be made available upon request.
4. The written complaint or modification request should contain the information required by the ALTRANs' public policy that is available upon request. Alternative formats and language translations for this document are available on request.
5. Explanation of approval or denial of reasonable modification requests will be made and sent to the requestor within seven calendar days of receipt.
6. Within 15 calendar days of receiving a complaint, the ADA Coordinator at ALTRAN will meet with the complainant to discuss the complaint and possible resolutions.
7. Within 15 calendar days of the meeting, the ADA Coordinator at ALTRAN will respond in writing or another accessible format. The response will explain the position of ALTRAN and offer options for substantive resolution of the complaint.
8. If the response by the ADA Coordinator at ALTRAN does not resolve the issue, the complainant and/or designee may appeal the decision within 15 calendar days to the Federal Transit Administration Office for Civil Rights.
9. All written documents in the process will be retained by ALTRAN for at least one year.

Attachment B

**Alger Transit Authority**

**ADA Discrimination Complaint Form**

Instructions: Please fill out this form completely, sign and mail, fax, or email to:

Paige Eaton - ADA coordinator

[altrandirector@jamadots.com](mailto:altrandirector@jamadots.com)

PO Box 69

Munising, MI 49862

Fax: 906-387-2963

Complainant: \_\_\_\_\_

Address: \_\_\_\_\_

City, State and Zip Code: \_\_\_\_\_

Telephone: Home: \_\_\_\_\_ Mobile: \_\_\_\_\_

Person Discriminated Against (if other than the complainant): \_\_\_\_\_

Address: \_\_\_\_\_

City, State and Zip Code: \_\_\_\_\_

Telephone: Home: \_\_\_\_\_ Mobile: \_\_\_\_\_

Email Address: \_\_\_\_\_

When did the discrimination occur? Date: \_\_\_\_\_

Describe the acts of discrimination, providing the name(s) where possible of the individuals who discriminated:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Alger Transit Authority**

**ADA Reasonable Modification Request Form**

Instructions: Please fill out this form completely, sign and mail, fax, or email to:

Paige Eaton - ADA coordinator  
[altrandirector@jamadots.com](mailto:altrandirector@jamadots.com)  
PO Box 69  
Munising, MI 49862  
Fax: 906-387-2963

Rider: \_\_\_\_\_

Street Address: \_\_\_\_\_

City, State, and Zip Code: \_\_\_\_\_

Telephone: Home: \_\_\_\_\_ Mobile: \_\_\_\_\_

Email address: \_\_\_\_\_

Person requesting modification (if other than the rider): \_\_\_\_\_

Address: \_\_\_\_\_

City, State and Zip Code: \_\_\_\_\_

Telephone: Home: \_\_\_\_\_ Mobile: \_\_\_\_\_

Email Address: \_\_\_\_\_

Describe the rider's disability or disabilities. \_\_\_\_\_

Describe the service policy or program that may need to be modified to allow the rider full access to the transit services provided. \_\_\_\_\_

How does the current service policy or program prevent the rider from using the transit service or program? \_\_\_\_\_

Please describe the specific modification to the current policy/procedure that you are requesting. \_\_\_\_\_

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How would you like the ADA Coordinator at ALTRAN to respond to your request?

- In writing to the address listed above
- By email to the address listed above

If future communications regarding this request are needed in an alternate format, please indicate the appropriate format below:

- large print (font size needed: \_\_\_\_\_)
- Spanish

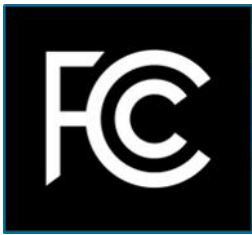
This form can be requested in large print by calling 906-387-4845, Ext. 2; TTY 711 (see Attachment D for more information); or emailing [altrandirector@jamadots.com](mailto:altrandirector@jamadots.com).

Please send the completed form **and any required documentation of disability** to:

Paige Eaton - ADA Coordinator  
[altrandirector@jamadots.com](mailto:altrandirector@jamadots.com)  
PO Box 69  
Munising, MI 49862  
Fax: 906-387-2963

Electronic versions of the completed form and scans of required documentation of disability should be sent to the ADA Coordinator at [altrandirector@jamadots.com](mailto:altrandirector@jamadots.com).

The ADA Coordinator at ALTRAN will provide a written response to your request within seven days of its receipt. To check on the status of the request, call ALTRAN at 906-387-4845, Ext. 2; TTY 711 (see Attachment D for more information, or email [altrandirector@jamadots.com](mailto:altrandirector@jamadots.com)).



## 711 for Telecommunications Relay Service

TTY-based Telecommunications Relay Services permit persons with a hearing or speech disability to use the telephone system via a text telephone (TTY) or other device to call persons with or without such disabilities.

To make using TRS as simple as possible, you can dial 711 to be automatically connected to a TRS communications assistant. It's fast, functional and free. Dialing 711, both voice and TTY-based TRS users can initiate a call from any telephone, anywhere in the United States, without having to remember and dial a ten-digit access number.

### Dial 711 using private branch exchanges and VoIP

FCC rules require all telephone companies that operate private branch exchanges (PBXs) - a private telephone system within an organization - to implement three-digit 711 dialing for access to TRS. This includes wireline, wireless and payphone providers. PBX operators are required to modify their equipment to enable 711 dialing to ensure everyone has easy access to TRS.

Callers from locations served by PBXs may be required to dial 9 or another prefix before entering the 711 code or placing an outside call.

Providers of interconnected Voice over Internet Protocol (VoIP) service also must offer 711 dialing service.

### 911 calls

The Americans with Disabilities Act requires that people with disabilities who use TTYs or other devices have direct, equal access to emergency response services. In the event of an emergency, TTY users should call 911 directly and not make a TTY-based TRS call via 711.

### Other forms of TRS

711 dialing access does not work for Video Relay Service (VRS), Internet Protocol Relay (IP Relay), or IP Captioned Telephone Service (IP CTS) calls, because such calls are initiated through the Internet. Individuals calling a VRS, IP Relay, or IP CTS user should call their party directly, and a communications assistant will be automatically connected to the call.

711 dialing access also does not work for Captioned Telephone Service (CTS). Individuals calling a two-line CTS user should call their party directly. Individuals calling a one-line CTS user will need to dial a toll-free CTS number before connecting to the user.

### More information on TRS

For more information about the various types of TRS, see the FCC's consumer guide ([www.fcc.gov/guides/telecommunications-relay-service-trs](http://www.fcc.gov/guides/telecommunications-relay-service-trs)) or visit the website of our Disability Rights Office ([www.fcc.gov/accessibility](http://www.fcc.gov/accessibility)).





## Filing a complaint

You have multiple options for filing a complaint with the FCC:

- File a complaint online at <https://consumercomplaints.fcc.gov>
- By phone: 1-888-CALL-FCC (1-888-225-5322); TTY: 1-888-TELL-FCC (1-888-835-5322); ASL: 1-844-432-2275
- By mail (please include your name, address, contact information and as much detail about your complaint as possible):

Federal Communications Commission  
Consumer and Governmental Affairs Bureau  
Consumer Inquiries and Complaints Division  
45 L Street NE  
Washington, DC 20554

## Alternate formats

To request this article in an alternate format - braille, large print, Word or text document or audio - write or call us at the address or phone number at the bottom of the page, or send an email to [fcc504@fcc.gov](mailto:fcc504@fcc.gov).

Last Reviewed: 10/05/21

