



CITY OF REDONDO BEACH BEACH CITIES TRANSIT

REASONABLE MODIFICATION POLICY

POLICY STATEMENT

In accordance with the [March 13, 2015 Federal Register/Vol 80, No. 49](#), 49 CFR Part 37, Section 37.5 Nondiscrimination, the City of Redondo Beach, in operation of Beach Cities Transit fixed route services and the WAVE Dial-A-Ride, 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 these services, subject to the following limitations:

- (1) Granting the request would fundamentally alter the nature of the City'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 able to fully use the City's services, programs, or activities for their intended purpose.

ADMINISTRATIVE PROCEDURE

Designation of Responsible Employee

The following City employee is designated as responsible for coordination of the City's efforts to comply with this requirement:

Joyce Rooney, Transit Manager
Telephone: 310-318-0610, extension 2670
Email: Joyce.Rooney@redondo.org.



Requesting a Reasonable Modification on Beach Cities Transit

1. In Advance of the Transit Trip: When feasible, requests for modifications should be made in advance, before the transportation provider is expected to provide the modified service, by contacting:

City of Redondo Beach, Transit Division
Telephone: 310-937-6660
Email: bct@redondo.org

- a) Individuals making a request for modification should provide the following information:
 - i) Individual's name and contact information [address, telephone number and/or email]
 - ii) Description of what is needed in order to use either Beach Cities Transit fixed route or WAVE Dial-A-Ride services; and
 - iii) Their anticipated date of travel when the requested modification would be needed.
- b) An individual need not use the term "reasonable modification" when making such a request. Transit Division staff will be trained as appropriate to recognize, document and address such requests.
- c) Upon receipt of a request for modification, the Transit Division will assess the nature of the request and provide the requesting individual with a response by the contact means provided by that individual not later than the close of next business day.
- d) If the requested modification is denied, the City 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 benefits provided by the City. If the specific modification is denied, such other actions that can be offered will be communicated to the individual by the contact means provided by that individual not later than the close of next business day.



- e) Each request for modification shall be documented, including the determination made and response provided to the requesting individual, including the dates and times of each event and individuals participating in the determination and communications.
2. At the Time of Travel: Where a request for modification cannot be practicably be made in advance, an individual wishing to travel on Beach Cities Transit or the WAVE Dial-A-Ride may make a request for modification to the vehicle operator by describing what they need in order to use the service.
- a) An individual making a request for modification at the time of travel is not required to provide any identification, contact data, or nature of their disability unless they desire to do so. The individual need not use the term “reasonable modification” when making such a request. Transit operating staff will be trained as appropriate to recognize, document and respond to such requests.
 - b) Upon receipt of a request for modification from an individual wishing to ride Beach Cities Transit or the WAVE Dial-A-Ride, the vehicle operator will inform the dispatcher of the requested modification and shall be advised by the dispatcher, in consultation with management as necessary, if the modification will be accommodated. The determination shall be communicated to the requesting individual by the vehicle operator and documented by the dispatcher.
 - c) If the requested modification is denied, the vehicle operator and dispatcher, in consultation with management as necessary, shall determine if there are any other actions (that would not result in a direct threat or fundamental alteration) that would allow the individual with a disability to receive the services or benefits provided by the City. Any such other actions that can be offered will be communicated to the individual by the vehicle operator and documented by the dispatcher, along with whether the individual chooses to accept the offered other actions.



3. During Travel on Beach Cities Transit or WAVE Dial-A-Ride: During travel on Beach Cities Transit fixed route or the WAVE Dial-A-Ride, an individual with a disability may find it necessary to request a modification in policy, practices, or procedures due to unanticipated conditions, for example, the accessibility of a desired bus stop or destination drop-off location. Such a request for modification may be made to the vehicle operator by describing what they need in order to use the service. An individual making a request for modification during travel is not required to provide any identification, contact data, or nature of their disability unless they desire to do so.
- a) The vehicle operator will inform the dispatcher of the requested modification and shall be advised by the dispatcher, in consultation with management as necessary, if the modification will be accommodated. The determination shall be communicated to the requesting individual by the vehicle operator and documented by the dispatcher.
 - b) If the requested modification is denied, the vehicle operator and dispatcher, in consultation with management as necessary, shall determine if there are any other actions (that would not result in a direct threat or fundamental alteration) that would allow the individual with a disability to receive the services or benefits provided by the City. Any such other actions that can be offered will be communicated to the individual by the vehicle operator and documented by the dispatcher, along with whether the individual chooses to accept the offered other actions.



Complaint Procedure

Any individual who disagrees with the administration of their request for modification, the determination or determinations made related to such a request, or the transit services provided as a result of such a request may file a complaint with Joyce Rooney, Transit Manager, by any of the following means:

By mail: Joyce Rooney, Transit Manager
City of Redondo Beach
Transit Division
415 Diamond Street
Redondo Beach CA 90277

By Email: Joyce.Rooney@redondo.org

By Telephone: 310-318-0610, extension 2670

To be most effective, complaints should be made to the City within thirty (30) days of the date of the event. Complaints must be submitted with the following information:

- (1) Name of the individual who requested the modification that is the subject of the complaint, along with their mailing address, telephone and email, if available;
- (2) Date the request for modification was made;
- (3) Description of the requested modification; and
- (4) Description of any alleged violations of this policy that form the basis of the individual's complaint.

The City of Redondo Beach will complete its investigation of submitted complaints and communicate its response to the complaint allegations, including its reasons for the response, to the complainant within thirty (30) days of receipt of the complaint.



Recordkeeping

The City shall maintain a record of all requests for modification received, the determination made, and the transit services provided. Additionally, the City shall maintain a record of all complaints received, the findings of the investigation, and copies of any and all communications to complainants.

Communication of this Policy

This policy shall be posted on the Beach Cities Transit website.

All City Transit Division staff and Contractor employees shall be trained as appropriate to their responsibilities in the requirements and administration of this policy.