

Jackson Transit Authority (JTA) Reasonable Modification Procedures

The US DOT issued a Final Rule under the American Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973 which takes effect on July 13, 2015 and can be found at https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_ADA_Reasonable_Modification.pdf Per this final rule, the Jackson Transit Authority (JTA) is required to make reasonable modifications or accommodations to policies, practices and procedures to ensure individuals with disabilities have equal access to its transit programs and services (fixed routes and LIFT) “The real-world effect will be that the nature of an individuals’ disability cannot preclude a public transit entity from providing full access to their service unless some exception applies”

Therefore, beginning July 13, 2015, JTA will consider requests for reasonable modifications so that individuals with disabilities can have equal access to our fixed route and “LIFT” (complimentary ADA) services as follows:

1. **Modification Request Submittals:** The individual requesting the modification will describe what they need in order to use JTA’s fixed route or LIFT service. Individuals should state their impending trip date within the request, if possible. JTA can take up to 21 days to process ADA applications and ADA Reasonable Accommodation requests.

2. **Designated Responsible Employee:** JTA’s Transportation Manager, Travis Franklin, is designated as the responsible employee to approve/deny pending reasonable modification requests. **Travis Franklin, Transportation Manager, 38 Eutah Street, Jackson, Tennessee 38301 or tfranklin@ridejta.com or 731-423-0200**

JTA is committed to providing public transit service to all the general public including those individuals with disabilities. If you are an individual with a disability and believe an accommodation or modification in JTA’s services, policies or programs would allow you to access JTA’s transit services, please contact Travis Franklin, via phone, letter or email and describe what is needed to be modified in order for you to use JTA services.

3. **Use of Term Reasonable Modification Not Required:** The individual requesting modification is not required to use the term

“reasonable modification” when making a request. General complaints concerning issues in accessing transit service or general information requests for modifications in service due to an individual’s disability should be directed to JTA’s Transportation Manager, as part of the general complaint process.

4. **Requests In Advance:** Whenever feasible, requests for modifications should be made and determined in advance, before JTA is expected to provide the modified service. Individuals should state their impending trip date within their request. Depending on the complexity of the request and if any financial assistance is needed to grant the request, additional JTA administrative/operational staff could also be involved in providing more information for any modification approval/denial determinations.
5. **Requests during Transit Trip:** Where a request for modification cannot practicably be made and determined in advance, operating personnel will make a determination of whether the modification should be provided at the time of the request. If necessary, operators will consult with JTA’s Dispatcher before making a determination to deny the request. Any denials for modifications that cannot be granted shall be written up as an incident by the driver to forward to Travis Franklin for official documentation.
6. **Reasonable Accommodation Approvals:** Any approved modification for a passenger with a disability shall be noted, and printed on the driver instructions (schedule) when picking up the passenger. It can take up to 21 days for JTA to process Reasonable Modifications. All JTA Dispatchers will have access to approved Reasonable Modifications.
7. **Grounds for Denial:** Requests for modifications of policies and practices may be denied on one or more of the following grounds:
 - Granting the request would fundamentally alter the nature of JTA’s Transit service, programs, or activities
 - Granting the request would create a direct threat to the health or safety of others
 - Without the requested modification, the individual with a disability is able to fully use JTA’s services, programs, or activities for their intended purpose
 - Results in an undue financial and administrative burden
8. **Other Actions Prior to Official Denial:** Any denials of formal requests prior to the trip would be confirmed with JTA’s

Transportation Manager and JTA's General Manager to ensure no other accommodations could be made to allow the individual to receive transit service. In any case in which JTA denies a request for a reasonable modification as requested by the passenger, JTA will 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 JTA.

9. **Reasonable Modification Denials:** Any denials for reasonable accommodation by JTA will be promptly communicated via written letter and/or e-mail to the individual requesting the accommodation including the reasons for the denial. All denials, including reasoning, will be documented for reporting purposes to the Federal Transit Administration upon request.

10. **Decisions Guided by 49 CFR Appendix E:** In determining whether to grant a requested modification, JTA will be guided by the provisions of United States Department of Transportation 49 CFR Appendix E to Part 37.169.
(<http://www.gpo.gov/fdsys/pkg/FR-2015-03-13/pdf/2015-05646.pdf> - pages 13261-13263)

- a. **Procedures Availability:** JTA's complaint and reasonable accommodation procedures are available on JTA's website at www.ridejta.com or by an individual's request to JTA. For a copy of these procedures, please call JTA at 1-731-423-0200 or e-mail tfranklin@ridejta.com