

Reasonable Modification Policy

Effective: April 25, 2024

Purpose

The purpose of the reasonable modification policy is to ensure that **Northwoods Transit Connections** offers equitable and effective opportunities and access to public transportation services for persons with disabilities and full compliance with the provisions of Title II of the Americans with Disabilities Act of 1990 and Section 504 of the Rehabilitation Act of 1973.

Policy

Northwoods Transit Connections is committed to providing equitable access and opportunity to individuals with disabilities in all programs, services, and activities. **Northwoods Transit Connections** recognizes that in order to have equitable and effective opportunities and benefits, individuals with disabilities may need reasonable modification to policies, practices, and procedures. **Northwoods Transit Connections** will adhere to all applicable federal and state laws, regulations, and guidelines with respect to providing reasonable modifications, as necessary, to afford equal access to programs for persons with disabilities. **Northwoods Transit Connections** does not discriminate based on disability in admission to, participation in, or receipt of services and benefits under any transit program or activity. **Northwoods Transit Connections** will take appropriate steps to ensure that persons with disabilities have an equal opportunity to participate.

No individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of **Northwoods Transit Connections**, or be subject to discrimination by **Northwoods Transit Connections**.

Eligibility Criteria

An individual is eligible to request a reasonable modification consideration if that individual experiences a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such impairment; or been regarded as having such impairment¹.

Reasonable Modification

A reasonable modification is a change or exception to a policy, practice, or procedure that allows individuals with disabilities to have equitable access to programs, services, and activities.

Northwoods Transit Connections will make reasonable modifications to policies, practices, and procedures when necessary to ensure access to transit services for individuals with disabilities, unless:

- Making the modification would fundamentally alter the nature of the public transportation service.
- Making the modification would create a direct threat to the health or safety of others including passengers.
- The individual with a disability is able to fully use the transportation service

¹ Americans with Disabilities Act, Title 42, Chapter 126, Section 12102

without the modification.

- Making the modification would create an undue financial or administrative burden.

For the purposes of this section, the term reasonable modification shall be interpreted in a manner consistent with the term “reasonable accommodations” as set forth in the Americans with Disabilities Act title II regulations at 28 CFR 35.130(b)(7), and not as it is defined or interpreted for the purposes of employment discrimination under title I of the ADA (42 U.S.C. 12111–12112) and its implementing regulations at 29 CFR part 1630.

Requests for Reasonable Modification

Northwoods Transit Connections shall make information about how to contact **Northwoods Transit Connections** to make requests for reasonable modification readily available to the public.

Northwoods Transit Connections shall follow these procedures in taking requests:

- a. Individuals (or their representatives) requesting modifications shall describe what they need in order to use the service.

- b. Individuals requesting modifications are not required to use the term “reasonable accommodation or reasonable modification” when making a request.

Northwoods Transit Connections will determine if the request represents a reasonable modification and proceed in considering the request according to ADA guidelines and this policy.

- c. Whenever feasible, **Northwoods Transit Connections** requests that individuals make such requests for reasonable modification in advance if possible, to allow time to consider the request and, if approved, to make the appropriate modification to affected policies, practices, and/or procedures.
- d. Where a request for modification cannot practicably be made and determined in advance, **Northwoods Transit Connections** personnel shall make a determination of whether the modification can be made at the time of the request. Operating personnel should consult with **Northwoods Transit Connections’** management before making a determination to grant or deny the request.

Requests for accommodation may be made either orally or in writing. The reasonable modification process begins as soon as the request is received.

Reasonable modification request forms are by contacting **Northwoods Transit Connections** by phone or email. The request can be submitted in any written format. Alternative means of filing a request, such as personal interviews, phone calls, or taped requests, will be made available for persons with disabilities if unable to communicate their request in writing or in advance.

Interactive Process

When a request for modification is made, **Northwoods Transit Connections** and the individual requesting the modification must engage in a good faith interactive process to determine what, if any modification shall be provided. The individual and **Northwoods Transit Connections** must communicate with each other about the request and the process for determining whether a modification will be made. Communication is a priority throughout the entire process.

Time Frame for Processing Requests and Providing Reasonable Modification

Northwoods Transit Connections will process requests for reasonable modification and then provide the modification, where appropriate, within **(30) thirty business days**. **Northwoods Transit Connections** recognizes, however, that the time necessary to process a request will depend on the nature of the modification(s) requested and whether it is necessary to obtain supporting

information.

Granting a Reasonable Modification Request

As soon as **Northwoods Transit Connections** determines that a reasonable modification will be provided, that decision shall immediately be communicated to the individual. This notice will be in writing in order to maintain the required record for reporting purposes. However, upon request, alternative means of response will be provided.

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

Denying a Reasonable Modification Request

As soon as **Northwoods Transit Connections** determines that a request for reasonable modification will be denied, **Northwoods Transit Connections** will communicate the basis for the decision in writing to the individual requesting the modification. When requested, alternative means of response also will be provided. The explanation for the denial will clearly state:

- a. the specific reasons for the denial;
- b. any alternative modification that may create the same access to transit services as requested by the individual; and
- c. the opportunity to file an appeal relative to the **Northwoods Transit Connections'** decision on the request.

Appeal Process

Northwoods Transit Connections will follow its existing procedure for investigating and tracking complaints/appeals. Alternative means of filing an appeal, such as personal interviews, phone calls, or taped requests, will be made available for persons with disabilities if unable to communicate their request in writing or in advance.

Designated Employee

Northwoods Transit Connections shall designate one official within the organization responsible for processing reasonable modification requests and handling appeals. This individual is:

Barb Newman, Transit Manager

Address: 3611 Highway 47, P.O. Box 853, Rhinelander, WI 54501

Phone: (715)420-0585

Email: barb.newmannorthwoodstransit@outlook.com

Record Retention

Northwoods Transit Connections will maintain all records related to reasonable modification requests and denials for at least three (3) years.

Request for Reasonable Modification Form

Date:	
Submitted by:	
Cell Phone:	
Email:	

Submitted on behalf of: (please specify)

	Myself	
	Someone else (<i>insert name of rider</i>)	

Contact Information of Rider

Address	
Phone	
Email	

Please describe what modification the rider needs to use the transportation service.

--

Does the person needing modification currently ride Northwoods Transit Connections?

Yes No

If yes, please describe the current riding experiences without the requested modification.

--

Submit this form to:

- 1) **Attention:** Northwoods Transit Connections
- 2) **Mail:** 3611 Highway 47, P.O. Box 853, Rhinelander, WI 54501
- 3) **Email:** barb.newmannorthwoodstransit@outlook.com

Request for Reasonable Modification Form (continued)

Northwoods Transit Connections will process requests for reasonable accommodation and then provide the modification, where appropriate, within thirty (30) business days.

Northwoods Transit Connections will communicate directly with the person requesting the modification.

Northwoods Transit Connections recognizes, however, that the time necessary to process a request will depend on the nature of the modification(s) requested and whether it is necessary to obtain supporting information. If the modification is denied, an appeal process is in place.

Official Use Only

Northwoods Transit Connections	Date Received:	
	Request Number:	
Notes:		
Approved/Denied: <i>(Specify)</i>		
Official Name:		
Date:		

No-Show Policy

Northwoods Transit Connections Instructions

FTA recommends that a transit agency's no-show policy include, at a minimum:

- General policy statement
- Definition of no-shows
- Description of minimum driver wait times within pickup windows.
- Definition of late cancellations and how to cancel trips.
- Examples of no-shows and late cancellations beyond a rider's control and how riders should communicate such instances.
- Statement that no-shows due to transit agency errors do not count.
- Statement that subsequent trips after a no-show will not be automatically cancelled, and that passengers need to cancel any trips they do not intend to take.
- The transit agency's process to notify riders of recorded no-shows or late cancellations.
- What constitutes a pattern and practice of excessive no-shows.
- Time periods of potential service suspensions.
- Instructions for appealing proposed suspensions.

General Policy Statement on No-Shows

Northwoods Transit Connections understands that because some trips are allowed to be scheduled in advance, riders may sometimes miss scheduled rides or forget to cancel rides they no longer need.

Northwoods Transit Connections also understands that riders may sometimes miss scheduled trips or be unable to cancel trips in a timely way for reasons that are beyond their control. However, repeatedly missing scheduled trips (or failing to cancel trips in a timely way) can lead to suspension of service. The following information explains **Northwoods Transit Connections'** no-show policy.

Definitions: No-Show, Pickup Window, and Late Cancellation

No-show

A no-show occurs when a rider fails to appear to board the vehicle for a scheduled trip. This presumes the vehicle arrives at the scheduled pickup location within the pickup window and the driver waits at least **five (5)** minutes.

Pickup Window

The pickup window is defined as **30 minutes before the scheduled pickup time to 30 minutes after the scheduled pickup time**. Riders must be ready to board a vehicle that arrives within the pickup window. The driver will wait for a maximum of **five (5)** minutes within the pickup window for the rider to appear.

Late Cancellation

A late cancellation is defined as either a cancellation made less than **1 hour** before the scheduled pickup time or as a cancellation made at the door or a refusal to board a vehicle that has arrived within the pickup window.

Definition: No-Shows Due to Operator Error or to Circumstances Beyond a Rider's Control²

Northwoods Transit Connections does not count as no-shows (or late cancellations) any missed trips due to our error, such as:

- Trips placed on the schedule in error.
- Pickups scheduled at the wrong pickup location.
- Drivers arriving and departing before the pickup window begins.
- Drivers arriving late (after the end of the pickup window)
- Drivers arriving within the pickup window but departing without waiting the required **five [5] minutes**.

Northwoods Transit Connections does not count as no-shows or late cancellations situations beyond a rider's control that prevent the rider from notifying us that the trip cannot be taken, such as:

- Medical emergency
- Family emergency
- Sudden illness or change in condition.
- Appointment that runs unexpectedly late without sufficient notice

Riders should contact **Northwoods Transit Connections** staff when experiencing no-shows or late cancellations due to circumstances beyond their control.

Policy for Handling Subsequent Trips Following No-shows and Late Cancellations

When a rider is a no-show for one trip, all subsequent trips on that day remain on the schedule unless the rider specifically cancels the trips. To avoid multiple no-shows on the same day, riders are strongly encouraged to cancel any subsequent trips they no longer need that day.

Suspension Policies for a Pattern or Practice of Excessive No-shows and Late Cancellations

Northwoods Transit Connections reviews all recorded no-shows to ensure accuracy before recording them in a rider's account. **Northwoods Transit Connections** reserves the right to suspend from services any rider who establish a pattern or practice of missing scheduled trips.

Each verified No-Show consistent with the above definitions counts as **(1) penalty point**. Riders will be subject to suspension after meeting all the following conditions:

- Accumulate **(3)** penalty points in one calendar month
- Have booked at least **(3)** three trips that month
- Have "no-showed" or "late cancelled" at least (10%) percent of those trips.

A rider will be subject to suspension only if both the minimum number of trips booked and the minimum number of penalty points are reached during the calendar month.

Northwoods Transit Connections will attempt to notify riders by telephone after they have accumulated **(2) penalty points** and would be subject to suspension should they have verified "no shows" of 10% of total booked trips.

All suspension notices include a copy of this policy, information on disputing no-shows and how to appeal suspensions.

Violations result in the following:

1st violation – Triggers attempting a warning phone call and written letter, but no suspension.

2nd violation – **7 calendar days** suspension

3rd violation – **14 calendar days** suspension

4th violation – **21 calendar days** suspension

5th and subsequent violations – **28 calendar days** suspension

Note: Suspension schedule cannot exceed 30 calendar days.

A record of no-show violations will be kept for only a six-month period. This ensures that someone with a no-show problem in January, will not be unduly punished in August unless a problem exists.

Policy for Disputing Specific No-Shows or Late Cancellations

Riders wishing to dispute specific no-shows or late cancellations must do so within **(7) business days** of receiving suspension letters. Riders should contact Northwoods Transit Connections to explain the circumstance and request the removal of the no-show or late cancellation.

Policy for Appealing Proposed Suspensions

Riders wishing to appeal suspensions under this policy have the right to file an appeal request in-person, via phone, email, or US mail within **(10) business days** of receiving suspension letters. Riders who miss the appeal request deadline will be suspended from **Northwoods Transit Connections** on the date listed on the suspension notice.

All suspension appeals follow **Northwoods Transit Connections** appeal policy.

Complaint/Comment Form

Northwoods Transit Connections wants your feedback. Please use this form for suggestions, compliments, and complaints. Submit this form electronically at barb.newmannorthwoodstransit@outlook.com or in person at the address below.

Northwoods Transit Connections

3611 Highway 47
P.O. Box 853
Rhineland, WI 54501

You may also call us at (715)420-0585. Please make sure to provide your contact information in order to receive a response.

Section A: Accessible Format Requirements

Please check the preferred format for this document

<input type="checkbox"/> Large Print	<input type="checkbox"/> TDD or Relay	<input type="checkbox"/> Audio Recording	<input type="checkbox"/> Other (if selected please state what type of format you need in the box below)
--------------------------------------	---------------------------------------	--	---

Click or tap here to enter text.

Section B: Contact Information

Name <input type="text"/>	Telephone Number (including area code) <input type="text"/>
Address <input type="text"/>	City <input type="text"/>
State <input type="text"/>	Zip Code <input type="text"/>

Email Address

Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
---	------------------------------	-----------------------------

If no, please provide the name and relationship of the person for whom you are complaining and why you are completing the form on their behalf in the box below.

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
---	------------------------------	-----------------------------

Section C: Type of Comment

What type of comment are you providing? Please check which category best applies.

<input type="checkbox"/> Complaint	<input type="checkbox"/> Suggestion	<input type="checkbox"/> Compliment	<input type="checkbox"/> Other
------------------------------------	-------------------------------------	-------------------------------------	--------------------------------

Which of the following describes the nature of the comment? Please check one or more of the check boxes.

<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> Religion
<input type="checkbox"/> Age	<input type="checkbox"/> Sex	<input type="checkbox"/> Service	<input type="checkbox"/> Income Status
<input type="checkbox"/> Limited English Proficient (L.E.P)		<input type="checkbox"/> Americans with Disability Act (A.D.A)	

Section D: Comment Details

Please answer the questions below regarding your comment

Did the incident occur on the following type of service? <i>Please check any box that may apply.</i>	<input type="checkbox"/> Paratransit	<input type="checkbox"/> Shared Ride Taxi	<input type="checkbox"/> Bus
What was the date of the occurrence?	Click to add date in the following format: Day, month, year		
What was the time of the occurrence?	Click to add the time		
What is the name or identification of the employee or employees involved?	Click or tap here to enter text.		
What is the name or identification of others involved, if applicable?	Click or tap here to enter text.		
What was the number or name of the route you were on, if applicable?	Click or tap here to enter text.		
What was the direction or destination you were headed to when the incident occurred, if applicable?	Click or tap here to enter text.		
Where was the location of the occurrence?	Click or tap here to enter text.		
Was the use of a mobility aid involved in the incident?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Please add any additional descriptive details about the incident.	Click or tap here to enter text.		

In the box below, please explain as clearly as possible what happened and why you believe you were discriminated against.

Click or tap here to enter text.

Section E: Follow-up

May we contact you if we need more details or information?

Yes

No

If yes, how would you best liked to be reached? Please select your preferred form of contact below

Phone

Email

Mail

If you would prefer to be contacted by phone, please list the best day and time to reach you.

Click here to add your preferred time

Click here to add your preferred day

Section F: Desired Outcome

Please list below, what steps you would like taken to address the conflict or problem.

Click or tap here to enter text.

If applicable, please list below all additional agencies you have filed this complaint with such as Federal, State, Local agencies, or with any Federal or State Court. Please include the contact information to where the complaint was sent.

Click or tap here to enter text.

Section G: Signature

Please attach any documents you have which support the allegation. Then date and sign this form and send it to Northwoods Transit Connections.

Name

Date:

Signature

List of Complaints, Investigations and Lawsuits³

Northwoods Transit Connections maintains a log to track and resolve transit related complaints, investigations, and lawsuits.

Check One:

Since the last update of this *ADA Complementary Paratransit Plan*, there has been no transportation related civil rights investigations, complaints, or lawsuits filed with the _____ **Northwoods Transit Connections**.

There have been investigations, complaints and/or lawsuits filed against us. *See list below.*
 _____ *Attach additional information as needed.*

Note: The performance measure for tracking when an investigation begins and when its administratively closed is documented in the **Complaint Log** table below. **Northwoods Transit Connections** will strive to complete the investigation within the timeframe specified in its **Complaint Procedure**.

Type Complaint Investigation Lawsuit	Date (Month, Day, Year)	Complainant's Name/Address/ Phone/Email	Basis of Complaint ⁴	Summary Complaint Description	Status	Action Taken/ Final Outcome if Resolved List dates of action steps including the dates complaint/ investigation begins and is administratively closed.

³ **Lawsuit:** The protected class under Title II is disability. The protected classes under Title VI are Race, Color and Nation Origin.

⁴ **Basis of Complaint:** Specify Race, Color, National Origin, Disability, Religion, Sex, Age, Service, Income Status, Limited English Proficient (LEP), Safety, Other

Sample – Acknowledge Receipt Letter

Letter/Email Acknowledging Receipt of Complaint

Date

Ms. Jan Doe
1234 Main St.
XXXX, WI 53531

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the **Northwoods Transit Connections** alleging _____.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by phone, (715)420-0585, email barb.newmannorthwoodstransit@outlook.com or by mail at:

Northwoods Transit Connections
3611 Highway 47
P.O. Box 83
Rhineland, WI 54501

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Transit Manager
Northwoods Transit Connections
3611 Highway 47
P.O. Box 83
Rhineland, WI 54501

Sample - Closure Letter

Notifying Complainant that the complaint is not substantiated

Date

Ms. Jan Doe
1234 Main St.
XXXX , WI 53531

Dear Ms. Doe:

The matter referenced in your complaint of _____(date) against the **Northwoods Transit Connections** alleging _____ has been investigated.

The results of the investigation did not indicate that the provisions of the Americans with Disabilities Act (ADA) was violated. As you know, ADA prohibits discrimination in any program receiving federal financial assistance.

Northwoods Transit Connections has analyzed the materials and facts pertaining to your case for evidence of the city's failure to comply with any of the ADA laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not be substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within 10 business days of receipt of this final written decision from the **Northwoods Transit Connections**, and/or 2) file a complaint externally with the Federal Transit Administration at:

Federal Transit Administration, Region V
Office of Civil Rights
Attention: Title VI Program Coordinator
200 West Adams Street, Suite 320
Chicago, IL 60606

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Northwoods Transit Connections
3611 Highway 47
P.O. Box 83
Rhineland, WI 54501

Sample - Letter of Finding (LOF)

Notifying Complainant the complaint is substantiated

Date

Ms. Jan Doe
1234 Main St.
XXXX, WI 53531

Dear Ms. Doe:

The matter referenced in your letter of _____ (date) against the **Northwoods Transit Connections** alleging an Americans with Disabilities Act (ADA) violation has been investigated.

(An/Several) apparent violations of the ADA, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. **(If a hearing is requested, the following sentence may be appropriate.)** You may be hearing from this office, or from state or federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Northwoods Transit Connections
3611 Highway 47
P.O. Box 83
Rhineland, WI 54501

Northwoods Transit Connections

Appeals Process

Northwoods Transit Connections riders have the right to an administrative appeal if they do not agree with an eligibility determination or a decision to suspend service for No Shows/Late Cancellations or Disruptive Conduct.

This appeal process may also be used to appeal a reasonable modification determination or Civil Rights/Title VI complaint determination.

Appeals for service suspensions due to no show violations or disruptive conduct may be heard by **Northwoods Transit Connections** staff member(s) not involved in the suspension process. The decision of the independent **Northwoods Transit Connections** staff member(s) is final.

You may appeal in writing or in person. **You must submit the written Notice of Appeal form on the back of this page if you wish to file an appeal.**

If you have any questions related to your right to appeal, please contact Barb Newman, **Northwoods Transit Connections** Transit Manager at (715)420-0585, barb.newmannorthwoodstransit@outlook.com.

Eligibility Determination Appeals:

If you are appealing an eligibility application denial, you must submit an appeal within **60 calendar days** of the application denial. If a decision is not made by **Northwoods Transit Connections** within **30 calendar days** of the completion of the appeal process, **Northwoods Transit Connections** must provide paratransit service from that time until and unless a decision to deny the appeal is issued.

No Show Appeals:

If you are appealing a service suspension for violation of **Northwoods Transit Connections'** No Show/Late Cancellation Policy, service **will be** provided until an appeal hearing is concluded and a decision rendered.

Disruptive Conduct Appeals:

If you are appealing a service suspension for violent, seriously disruptive, or illegal behavior, service **will NOT** be provided during the appeal process.

Reasonable Modifications Appeals:

If you are appealing the decision made by the **Northwoods Transit Connections** regarding a reasonable modification request determination, service **will NOT** be provided during the appeal process.

Civil Rights/Title VI Complaint Appeals:

If you are appealing the decision made by the **Northwoods Transit Connections** regarding a Civil Rights/Title VI investigation, a Complainant may use the form attached to appeal the civil rights determination.

NOTICE OF APPEAL

If you wish to appeal your service suspension or civil rights determination, please complete this form, and return it as soon as possible. Appeals must be returned within **(10) business days⁵** of your notification of suspension and/or the civil rights determination.

Rider Information			
Name:		Phone:	
ID#:		Email:	
Address:			

Please check one of the following:

<input type="checkbox"/>	I wish to appeal in person. Individuals choosing to appeal in person will be contacted by Northwoods Transit Connections to schedule the appeal hearing. Hearings may be conducted by teleconference at Northwoods Transit Connections' discretion.
<input type="checkbox"/>	I wish to appeal in writing. I understand the final decision on my appeal will be based solely on written materials in possession of Northwoods Transit Connections and those I am submitting with this form. (If you choose to appeal in writing, you must state specifically why you disagree with the suspension. You should provide supporting documentation.)

Tell us why you are appealing: (attach additional pages and documentation, if needed)

Signature/Date: (this form will be returned if unsigned)

Name: _____	Date: _____
Signature: _____	

Return this form and include any supporting documentation to:

Northwoods Transit Connections
3611 Highway 47
P.O. Box 83
Rhineland, WI 54501
barb.newmannorthwoodstransit@outlook.com

⁵ Appeals related to application determination denial must be submitted to within **60 calendar days** of the application denial.

Trip Denial Log

Example Only - This document is an example of the type of information **Northwoods Transit Connections** gathers to document and analyze trip denials to ensure a pattern or practice of a substantial number of trip denials is not



Date	Name	Rider ID #	Is the Rider Disabled? Yes/No	Limited English Proficient? Yes/No	Trip Request		Origin	Destination	Reason for Trip Denial	Wait List? Yes/No	Trip Request		Origin	Destination	Reason for Trip Denial	Wait List? Yes/No
					Day	Time					Day	Time				

Notes: FTA C 4701.1

It is noted that **all** trip requests should be recorded, regardless of whether the trip is denied.

The purpose of this log is to track the characteristics of trip denials to help determine the underlying causes in order to take steps necessary to prevent future denials.

Examples of Trip Denials:

Counting the number of trip denials means accounting for **all** trips that the rider is unable to take because of the denial.

1. A rider requests a next-day trip, and the transit agency says it cannot provide that trip.
2. A rider requests a next-day trip, and the transit agency can only offer a trip that is outside the one-hour negotiating window (before or after the individual's desired departure time). This represents a denial regardless of whether the rider accepts such an offer.
3. A rider requests a round-trip and the transit agency denies a rider the outbound portion of a requested round-trip and only offers a return trip. If the rider then elects not to travel at all, this represents two denials. However, if an agency denies a "going" trip and the rider accepts a return trip, then this is counted as one denial.

Limited English Proficiency: Only log callers whose English is so limited that either: (a) the trip cannot be serviced; or (b) the call must hand off the phone to someone else to complete the order.