



# **Reasonable Modifications for OC ACCESS**

## **Specialized Transit Services Department**

**July 22, 2025**

# TOPICS COVERED

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History of Reasonable Modification

Reasonable Modification: What is it?

Reasonable Modification: What *isn't* it?

OCTA's Reasonable Modification Process

Requests and Results



# HISTORY OF REASONABLE MODIFICATION

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- 1990 - The Americans with Disabilities Act of (ADA)
- 2015 - U.S. Department of Transportation



# REASONABLE MODIFICATION: WHAT IS IT?

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- Agencies are required to make reasonable modifications to policies, practices, and procedures to avoid discrimination and ensure that their programs are accessible to individuals with disabilities.
- For more information: Appendix E of 49 CFR Part 37

## REASONABLE MODIFICATION: WHAT *ISN'T* IT?

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- Requests for a modification may be denied if they:
  - Fundamentally alter the nature of the service
  - Create a direct threat to the health or safety of others
  - Are not necessary because the individual is able to fully use the service without the modification
  - Result in an undue financial or administrative burden

# OCTA'S PROCESS

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- Reasonable modification requests can be submitted via:
  - Online form at: <https://www.octa.net/about/about-octa/ada/overview/>
  - Email: [ADAInquiries@OCTA.net](mailto:ADAInquiries@OCTA.net)
  - Mail: OCTA's ADA Coordinator
    - 550 S. Main St. – P.O. Box 14184 – Orange, CA 92863-1584
  - Phone: OC Bus fixed-route: (714) 560-5810  
OC ACCESS: (714) 560-5808

# OCTA'S PROCESS

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- Reasonable modification request is received and logged in internal tracking system
- The request is evaluated to determine its reasonability
- A written reply is sent as soon as possible
  - The written response communicates the decision regarding the requested reasonable modification, and the reason(s) for the decision



# COMMON REQUESTS AND RESULTS – OC ACCESS

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- Granted
  - Door-to-door service to/from a flat & unobstructed building entrance
  - Picking up a rider on private property requiring authorized access
  - Assisting a rider insert the fare into the farebox
  - Eating and drinking on the vehicle
- Denied
  - Specific vehicle requests
  - Requests for operators to perform personal care attendant (PCA) duties
- Case-by-case basis
  - Request for an accessible vehicle





# LESS COMMON REQUESTS AND RESULTS

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- Granted
  - Pick up and drop off at locations with multiple entrances
  - Obstructions
- Denied
  - Request to ride in a mobility device not intended for indoor use
  - Exclusive rides
  - A specific operator or specific seat in the vehicle
- Case-by-case basis
  - Operator lifting the rider out of their mobility device in an emergency
  - Need for return trip assistance

# REASONABLE MODIFICATIONS FOR OC ACCESS

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Questions?