



**Regional Transit Authority  
Of Southeast Michigan**

**AMERICANS WITH  
DISABILITIES ACT (ADA)  
POLICIES AND  
PROCEDURES**

OCTOBER 2024

# TABLE OF CONTENTS

Introduction and Background ..... 1

Reasonable Accommodations and Modifications ..... 5

ADA Grievance Policy ..... 10

Fragrance-Free Environment ..... 12

Physical Access to RTA Facilities ..... 15

Audio Access ..... 18

Telephone Access in Buildings ..... 19

Service Animals ..... 21

Eligibility Criteria and Tests for RTA Services and Paratransit  
Services ..... 26

Paratransit Services ..... 28

Information about Disabilities ..... 29

Web Page Accessibility ..... 31

Sensitivity to All Disabilities ..... 34

Nondiscrimination Contract Language Policy ..... 35

Disability Resources ..... 37

ADA-Complaint Procedure ..... 41

Resources .....45

**Note:** This document has 16-point font body-text and 18+-font heading-text to enhance visual accessibility. Information found in this document can be provided in an alternative format upon request. Please contact the Regional Transit Authority (RTA) at 313-402-1020 to speak to a representative or email [info@rtamichigan.org](mailto:info@rtamichigan.org). The RTA will do its best to provide the requested alternative format within a reasonable period.

# Introduction and Background

The Regional Transit Authority of Southeast Michigan (RTA) became The QLINE Service Operator in October 2024. The QLINE is the 3-mile streetcar service in downtown Detroit that began service in 2017 and currently has an annual ridership of 644,187. Initially, the system was privately operated, until the Regional Transit Authority (RTA) assumed operation, as originally planned, to be eligible for federal and state funding after operating over 7 years.

The QLINE offers:

- Station-level access for people who use mobility assistance devices such as wheelchairs.
- Bicycles and strollers are also easy to bring aboard and store on the QLINE.
- Reserved areas for disabled and elderly riders are marked in the center of the streetcar.

The QLINE is accessible for all users from the station facilities to the vehicles. The streetcar features low floors and high platforms for a minimal gap between platform and streetcar. The streetcars have level floor areas with substantial standing areas that can be used by wheelchairs and for strollers. Also, the streetcar has audio and digital display stop announcements.

## **PURPOSE**

The purpose of this document is to assist RTA staff in understanding the legal requirements of the Americans with Disabilities Act (ADA) of 1990, Section 504 of the Rehabilitation Act of 1973, and the 2010 ADA Standards for Accessible Design. The Federal Transit Administration (FTA) issued Circular 4710.1 (ADA Circular) in November 2015. The ADA Circular provides guidance for following ADA regulations, including 49 Code of Federal Regulations (CFR) Parts 27, 37, 38, and 39 as well as federal transit laws, 49 U.S. Code [USC] 5301 et seq. The ADA

Circular was developed to continue the efforts to incorporate universal access throughout the United States.

Title II of the ADA prohibits discrimination against persons with disabilities in all services, programs, and activities provided or made available by state or local governments. Physical and programmatic accessibility means that each government facility and program, when viewed in its entirety, is available and usable by people with disabilities. Examples of ensuring access to services can include, but are not limited to, the following:

- Use of visual, audio, or printed aides
- Use of an accessible vehicle or mobility device
- Movement of a program, activity, or service to an accessible location
- Accessibility improvements to an existing facility

## **AGENCY ADA COORDINATOR**

RTA has appointed an ADA Coordinator to oversee the programmatic and physical accessibility compliance for the

agency. For issues relating to individual access to RTA programs and services, including issues relating to the accommodation of employees with medical conditions or disabilities, RTA's ADA Coordinator is available for consultation. Additionally, RTA's ADA Coordinator is available for consultation on any issue related to public accessibility.

### **RTA ADA Coordinator**

Julia Roberts, Planning & Innovation Director

Regional Transit Authority of Southeast Michigan

(313) 402-1020

[CivilRights@RTAmichigan.org](mailto:CivilRights@RTAmichigan.org)



# Reasonable Accommodations and Modifications

RTA is committed to providing reasonable accommodations, as defined under applicable federal and state laws and regulations, for persons with disabilities. RTA's commitment is part of its ongoing effort to ensure access to programs, services, and activities, and to assist in meeting program eligibility criteria and testing. Accommodations may include physical access to RTA offices, programs, services, websites, public meetings, and audio aids, visual aids, and speech aids as needed. Persons with disabilities who are requesting access ("Requestors") are asked to give 72 hours or three business days advance notice, if possible. RTA actively solicits and considers the input of Requestors concerning their preferences regarding accommodations.

## REASONABLE MODIFICATIONS

RTA is committed to providing reasonable modification to its policies and practices as required by the United States

Department of Transportation (USDOT) and FTA guidelines.

Reasonable modifications include to RTA's service standards and practices, administrative policies, and other practices that could be a barrier to participating in RTA's public meetings or using RTA services. RTA will review all reasonable modification requests in real time and when requested in advance. Like reasonable accommodations requests, RTA should also receive reasonable modification requests 72 hours in advance.

## **RESPONSIBILITY**

RTA staff are responsible for responding to requests for reasonable accommodations and modifications. As needed, staff may contact RTA'S ADA coordinator for guidance or technical assistance regarding a particular request.

## **PROCEDURES**

As appropriate, RTA will provide notice to the public of the availability of reasonable accommodations on all documents disseminated or made available to the public (e.g., materials, brochures, agendas, announcements, advertisements, and

websites). Examples might include information about requesting audio, visual, or speech aids. For reasonable modifications of policies in real time, RTA staff will decide whether a policy can be safely modified and will not interfere with traffic or local laws.

## **RECOMMENDED LANGUAGE**

### **Flyers, Meeting Notices, and More**

The following language is recommended to be used on flyers, meeting notices and other RTA generated materials.

“In compliance with the Americans with Disabilities Act (ADA), the RTA will provide reasonable accommodations for persons with disabilities. If possible, please give 72 hours or three business days advance notice of any accommodation needs by calling (313) 402-1020 (Voice) or call the Michigan (Detroit) Relay Service by dialing 7-1-1.”

“If you believe RTA has not met your rights under the Americans with Disabilities Act (ADA), please contact Julia Roberts, Planning & Innovation Director for ADA coordination by calling

(313) 500-1500 (Voice) or call the Michigan (Detroit) Relay Service by dialing 7-1-1.”

## Public Meetings

For public meetings, the following statement should also be included:

“For the benefit of individuals who are sensitive to fragrances, please refrain from wearing fragranced or scented products.”

When receiving a request for accommodations (e.g., audio aids, visual aids, and speech aids), RTA designee will:

1. Refer to RTA’s Reasonable Accommodations and Reasonable Modifications Policy.
2. Arrange for reasonable accommodation(s) whenever possible.
3. Immediately notify the Requestor of the outcome of the request for accommodation(s).

For reasonable modifications request of RTA’s service standards and policies, the request will be reviewed in real time if a

medical necessity (for example, if a Requestor with diabetes must eat to prevent blood sugar drop). The determination will be made if the request is safe to implement and abides by traffic and local laws.

If RTA is unable to provide the requested accommodation(s) or modification(s) or an acceptable alternative, staff must document in writing the reason(s) for same and provide a copy to the Requestor and the ADA coordinator.

# ADA Grievance Policy

Requestors should be informed of their appeal rights and how to access RTA's ADA grievance procedure. Public notification of the grievance procedure should be included on all appropriate RTA materials, brochures, agendas, announcements, advertisements, and websites.

## RESPONSIBILITY

The primary responsibility for ensuring that Requestors are informed of RTA's ADA grievance procedure will rest with all RTA staff.

## PROCEDURES

For programs, activities, or services it provides to the public, RTA will include notification of the ADA grievance procedure on all appropriate RTA materials, brochures, agendas, announcements, advertisements, websites, etc. (see Recommended Language)

The ADA coordinator must ensure that all appropriate staff are informed of the ADA grievance procedure. RTA will make available copies of the ADA grievance procedure to the public upon request.

# Fragrance-Free Environment

RTA understands that certain individuals may be sensitive to fragrances and chemical-based products and in some cases may experience adverse physical reactions. To ensure that programs, services, and activities are accessible to all, RTA's policy is to promote a fragrance-free environment.

The American Lung Association states that allergic and asthmatic patients, as well as those with other conditions, have reported that certain odors, even in very small amounts, can trigger an adverse physical reaction.

## RESPONSIBILITY

Individuals are asked not to bring scented products, cleaners, deodorizers, or other scented personal care products into RTA facilities. This request should be included in public notices and on displayed signage throughout RTA facilities.

Scented products may include:

- Hand sanitizers



- Perfume and cologne
- Laundry detergent and softener
- Body soaps, lotions, and oils
- Hair products
- Air fresheners
- Essential oils
- Cosmetics
- Scented cleaning products

## **PROCEDURES**

Under this policy, the RTA respectfully requests that all individuals refrain from wearing perfume, cologne, or other personal care products containing fragrances, and use unscented personal care products to the greatest extent possible to promote a fragrance-free environment.

Unscented products will be encouraged as standard for RTA cleaning products, except where facility operations specify cleaners for disinfecting purposes. RTA will make every effort to

limit the use of cleaning products with strong scents to non-peak hours. If a member of the public or an employee reports an adverse reaction to a specific odor, RTA will identify and remove the cause of the odor to the greatest extent possible.

# Physical Access to RTA Facilities

RTA will ensure that all buildings and facilities that are owned, purchased, leased, released, constructed, or renovated meet applicable standards and codes for ADA compliance.

## RESPONSIBILITY

The primary responsibility for ensuring that each building and facility is physically accessible to people with disabilities will rest with the RTA ADA Coordinator to notify the building or tenant within a facility.

## LEASED PROPERTY

When negotiating any lease agreement for property with public access, RTA will develop a plan for ADA compliance, including estimated time frames and anticipated financing. Such plans are to be reviewed and approved by the ADA Coordinator with the advice of the ADA compliance advisory committee. The ADA Coordinator will incorporate approved projects into the recommended facilities plan. The RTA Board of Directors, or

Executive Director as its designee, has the ultimate authority to accept or reject recommended lease agreements.

## **RTA-OWNED PROPERTY**

When remodeling existing facilities or constructing new ones, RTA will develop a plan for Title II ADA compliance, including estimated time frames and anticipated financing. Such plans are to be reviewed and approved by the ADA Coordinator under the advice of the ADA compliance advisory committee. The ADA Coordinator will incorporate approved projects into RTA's ADA plan. RTA's Executive Director has the ultimate authority to approve or reject recommended ADA improvements.

### **Procedures**

1. To schedule a formal ADA site evaluation of a new or existing RTA-owned or leased facility, staff should contact the ADA Coordinator. Compliance evaluation will be scheduled at the ADA compliance advisory committee's earliest convenience. Please allow at least two weeks in advance to schedule the site-evaluation and another two weeks for report generation.

2. To schedule a formal review of planning documents (such as interior space plans, construction or ADA project documents, equipment specification sheets), staff should contact the RTA ADA Coordinator. Planning documents will be reviewed at the ADA compliance advisory committee meeting.

# Audio Access

RTA will ensure that all buildings and facilities that are owned or leased, or are constructed or renovated and are accessed by the public, undergo a review to assess Title II ADA compliance for audio access. RTA will make every effort to ensure the availability of installed assistive listening devices in public meeting rooms with a seating capacity of 50 or more, per the 2010 ADA standards, and provide portable assistive listening devices in smaller rooms.

## PROCEDURES

To ensure Title II ADA compliance for audio access prior to plan approval, the ADA coordinator, with the advice of the ADA compliance advisory committee, will review plans.

# Telephone Access in Buildings

RTA will provide telephone access to people with speech or hearing impairments that are comparable to access provided to the general public. This access will be provided through the following resources:

[michigan.gov/mpsc/consumer/telecommunications/michigan-relay](https://michigan.gov/mpsc/consumer/telecommunications/michigan-relay)  
[michigan.gov/mdcr/Divisions/doddbhh](https://michigan.gov/mdcr/Divisions/doddbhh)

## RESPONSIBILITY

The primary responsibility for ensuring telephone access to programs, services, and activities to members of the public with speech or hearing impairments will rest with department managers for their program, service, or activity.

## PROCEDURES

Each manager will cooperate with the ADA coordinator in conducting periodic surveys of the department's compliance with above policy and assessing need for telecommunications devices for the deaf (TDDs) or training in use of TDDs, relay

service, and speech-to-speech relay. Each manager must ensure that all appropriate personnel are adequately trained about the use of the relay service or speech-to-speech relay.



# Service Animals

Service animals ensure the independence of people with disabilities, and RTA facilities and services will accommodate their use.

## WHAT IS A SERVICE ANIMAL?

Under USDOT 49 CFR § 37.3, a service animal is defined as, “**Any guide dog, signal dog, or other animal individually trained to work or perform tasks for an individual with a disability, including, but not limited to, guiding individuals with impaired vision, alerting individuals with impaired hearing to intruders or sounds, providing minimal protection or rescue work, pulling a wheelchair, or fetching dropped items.**”

A service animal is individually trained to do work or perform tasks for individuals with disabilities, including a physical, sensory, psychiatric, intellectual, or other mental disability. Service animals do not always have a harness, a sign, or a

symbol indicating that they are service animals. A service animal is not a pet.

Service animals assist people with disabilities in many different ways, such as:

- Guiding people who are blind or have low vision and retrieving dropped objects for them.
- Alerting people who are deaf or hard of hearing to sounds and the presence of others.
- Carrying and picking up items, opening doors, or flipping switches for people who have limited use of hands, arms, or legs, or limited ability to bend or stoop.
- Pulling wheelchairs.
- Alerting people with disabilities to the onset of medical conditions such as seizures, protecting them and cushioning them if they fall, and performing other tasks that reduce the risk of disability-related injury.
- Performing tasks for persons with traumatic brain injury, intellectual disabilities, or psychiatric disabilities, such as

reminding a person with depression to take medication or waking him/her up, alerting a person with anxiety to the onset of panic attacks, orienting people with schizophrenia to reality, and helping people with intellectual or cognitive disabilities to locate misplaced items, find places, or follow daily routines.

- Providing physical support and assisting people with physical disabilities with stability and balance.

## **REQUIREMENTS PERTAINING TO SERVICE ANIMALS**

Often, individuals with disabilities who use service animals are easily identified without any need for questioning. If employees can identify a service animal through visual observation, it is RTA's policy to make an individual feel welcome by refraining from asking questions.

If unsure whether an animal meets the definition of a service animal, the RTA's policy is to ask the individual only two questions at the point of contact:

1. Is the animal a service animal required because of a disability?
2. What work or task has the animal been trained to perform?

If the individual says yes to the first question and explains the work or tasks that the animal is trained to perform, the RTA's policy is to welcome the person and service animal into our facilities, programs, and activities without asking any additional questions about the service animal.

It is not RTA's policy to ask individuals about their disabilities. RTA employees are not to ask an individual to show a license, certification, or special identification card as proof of their animal's training. Individuals with service animals are not required to use specific entrances or exits within RTA facilities unless necessary for specific public health or safety reasons.

## **SERVICE ANIMAL EXPECTATIONS**

Service animals are expected to be under the direct care and control of the individual handler. RTA has a right to exclude a

service animal from the service location if the animal is out of control and the handler does not take effective action to control it, or if the animal is not housebroken. Each situation will be considered individually. When there is a nondiscriminatory reason to ask that a service animal be removed, employees must offer the person with a disability the opportunity to obtain goods or services without the animal's presence. Only the ADA coordinator can make the decision to exclude a service animal.

Public inquiries or complaints about this policy may be directed to the RTA ADA coordinator:

Julia Roberts, Planning & Innovation Director

Regional Transit Authority of Southeast Michigan

(313) 402-1020

[CivilRights@RTAmichigan.org](mailto:CivilRights@RTAmichigan.org)

# Eligibility Criteria and Tests for RTA Services and Paratransit Services

RTA will not use “disability” or “skill” eligibility criteria or tests in violation of Title II of the ADA or other criteria that have the effect of preventing participation in services, programs, or activities based solely on disability to determine access to programs, activities, and services. Please note that RTA does not directly provide paratransit services to our riders. RTA relies on local approved paratransit providers such as the Detroit Department of Transportation (DDOT) and the Suburban Mobility Authority for Regional Transportation (SMART), who use eligibility criteria is set by ADA guidelines and FTA ADA Circular 4710.1. Additional information can be found in the Paratransit Services section.

## RESPONSIBILITY

The primary responsibility for ensuring that “disability” and/or “skill” eligibility criteria or tests are necessary and do not

prevent participation based solely on disability will rest with RTA's ADA Coordinator.

## **PROCEDURES**

RTA staff will cooperate with the ADA Coordinator in conducting periodic surveys of RTA staff's compliance with the above policy and assessing the use of "disability" or "skill" eligibility criteria/tests.

The RTA ADA Coordinator can be used as a resource regarding how to modify current eligibility criteria, modify programs, or provide separate programming meeting the needs of particular individuals with disabilities. Managers will ensure that all appropriate personnel are adequately trained in the need for and use of "disability" or "skill" eligibility criteria/tests.

# Paratransit Services

Under the ADA regulations at 49 CFR Section 37.131(a)(1)(i), transit entities must “provide complementary paratransit service to origins and destinations within corridors with a width of three-fourths of a mile on each side of each fixed route.” RTA oversees the distribution of federal grants including to the Detroit Department of Transportation (DDOT) and the Suburban Mobility Authority for Regional Transportation (SMART), which are both providers of paratransit services within the region. RTA’s QLINE is located in the service area of both agencies. RTA ensures oversight of the paratransit services provided by reviewing all service changes and fare changes. Additionally, RTA is represented on an advisory committee providing input and oversight of paratransit issues.



# Information about Disabilities

RTA will not require information about the disabilities of members of the public seeking or receiving services or applying or participating in RTA programs or activities unless the information is necessary to assess a member of the public's ability to effectively and safely access the service, program, or activity, or to assist in the provision of reasonable accommodations.

## RESPONSIBILITY

The ADA Coordinator is responsible for protecting disability information about those seeking or receiving services or applying or participating in RTA programs or activities, unless the information is necessary to assess a member of the public's ability to effectively and safely access the service, program, or activity, or to assist in the provision of reasonable accommodations.

## PROCEDURES

The ADA Coordinator will ensure that RTA personnel are adequately trained in the appropriate use of disability information obtained in accordance with this section, including the need to maintain the confidentiality of such information to the greatest extent possible.

# Web Page Accessibility

RTA will ensure that all web pages generated, funded, or sponsored by RTA are accessible to people with disabilities in accordance with the ADA requirements for accessible web content (Section 508). A checklist for creating accessible web content will be created and shared with RTA staff.

## RESPONSIBILITY

The primary responsibility for ensuring RTA web pages are accessible to people with disabilities will rest with RTA ADA coordinator. As needed, the managers or designee may contact the RTA ADA Coordinator for advice, technical assistance, or clarification of the checklist for creating accessible web content.

The RTA ADA Coordinator can be contacted to guide arrangement for consumer input and feedback regarding the accessibility of a specific web page.

## PROCEDURES

RTA website designers and content developers are to incorporate the accessibility checklist in the production of all new web pages and to review existing web pages to ensure that content is accessible and complies with the ADA.

Captioning and transcripts will be provided for educational and informational videos hosted on RTA's website, except for videos of meetings, as long as minutes and agendas of such meetings are made readily available. It may not be possible to add captioning to some old video files. In these cases, transcripts may be made available. RTA will maintain documentation of technical issues with any file that precludes captioning.

RTA generated, funded, or sponsored videos hosted on social media sites, such as YouTube, will include captions and, if possible, links to transcripts. All videos hosted on social media sites must include links back to an RTA-hosted website, with the video available in compliant format including captioning and transcripts. RTA information technology (IT) staff and/or

contractors will provide annual updates on new technologies and information systems that affect web accessibility. The ADA Coordinator will be responsible for overseeing an annual review of the accessibility of the RTA's website pages to ensure that accessibility features continue to be compatible with emerging technologies.

# Sensitivity to All Disabilities

RTA employees will be adequately informed about the ADA and its requirements and will have access to training on awareness of and sensitivity to disabilities covered under Title II.

## RESPONSIBILITY

The primary responsibility for ensuring that employees are informed on Title II of the ADA and its requirements, including access to training on awareness of and sensitivity to disabilities covered by Title II, will rest with the ADA Coordinator.

## PROCEDURE

RTA ADA Coordinator will provide for periodic Title II ADA and disability sensitivity training. Such training will be mandatory for all employees who regularly serve the public. Training will include requirements of Title II of the ADA and sensitivity to disabilities covered under Title II of the ADA. Human Resources will maintain documentation of employee training under this section for each employee who receives it.

# Nondiscrimination Contract Language Policy

RTA contracts shall include, as a standard requirement, the contractor's obligation to abide by RTA's nondiscrimination policy and compliance with applicable laws and regulations concerning disability accommodation.

## RESPONSIBILITY

Primary responsibility for ensuring compliance with this policy will rest with RTA's Procurement and Contracts Manager. This responsibility applies to all levels of contracts (i.e., contracts signed within the agency and contracts approved by the executive director and the board of directors).

## PROCEDURES

RTA Program Director will ensure that RTA's nondiscrimination policy references individuals with disabilities and that applicable disability law is cited.

**Required Language:**

- Contractor must comply with Sections 503 and 504 of the Rehabilitation Act of 1973, as amended (29 USC 797), and all requirements imposed by the applicable Health and Human Services regulations (45 CFR, Part 84).
- Contractor must comply with Section 508 (29 USC 794d) of the 1998 Amendments to the Rehabilitation Act, which requires that agencies must give employees and members of the public access with disabilities information that is comparable to the access available to others.
- Contractor must comply with ADA Title II (42 USC 12101 et seq.), which prohibits discrimination on the basis of disability, as well as all applicable regulations and guidelines issued pursuant to ADA Title II.



# Disability Resources

## BLINDNESS AND VISUAL IMPAIRMENT

For individuals who are blind, have vision loss, or are deaf and blind, there are many auxiliary aids and services available.

Additionally, individuals requesting accommodation may be able to provide specific information about which aid or aids are appropriate for their needs.

Large print enables many individuals with visual impairments to read printed material. Large print needs to be a minimum of size 16 font, though size 18 font is recommended. It should be in Courier or other easy-to-read style, and not in italics. Large print material should be either black font on a white background or black font on a yellow background.

Computer screen reading software can be installed on a computer to convert text into synthesized speech.

Other auxiliary aids include:

- Audio versions of printed documents

- Braille formatted documents
- Magnifiers (traditional and computer)

## **DEAF/HARD OF HEARING/SPEECH-LANGUAGE IMPAIRMENTS**

For individuals who are deaf, have hearing loss, or have speech-language impairment, there are a number of auxiliary aids and services available. Additionally, the individual requesting accommodation may be able to provide specific information about which aid or aids are appropriate for their needs.

TDDs are used by individuals with hearing impairments. TDDs have a typewriter-like keyboard with a cradle attachment in which to place the telephone handset. The individual with hearing impairment can then communicate with another person who also has a TDD, or could use the relay service to act as an intermediary to communicate the conversation back and forth between the parties. Some TDDs have the ability to print out the conversation.

Assistive listening devices may be used by individuals with hearing impairments in large rooms for group meetings, trainings, etc. Sound is amplified for individuals through a receiver, which contains an earphone.

Individuals who are deaf or who have impaired hearing can use sign language interpreters to communicate information using American Sign Language (ASL). It is very common for interpreting services to be requested for meetings, training sessions, or day-to-day job duties.

Speech-to-speech relay service is used for individuals having difficulty understanding someone. These individuals, ASL interpreters, or RTA staff may call the relay service to act as an intermediary to communicate the conversation.

## **COMMUNICATING WITH INDIVIDUALS WITH SPEECH OR LANGUAGE IMPAIRMENTS**

- Be patient. Do not complete words or phrases for the individual.

- Concentrate on the content of the conversation not the delivery.
- Communicate as naturally as possible.

## Assistive Technology

Assistive technology is an adaptive device(s) that allows a person (disabled or not) to function as independently as possible in their environment (home, work, etc.). Some examples include specialized software (speech recognition), keyboards (split keyboard) or mouse (trackball, track pad), adjustable height desk, monitor holder, mobile arm supports.

For an individual with a disability, assistive technology can often be the difference in whether or not they can independently access programs/services.

# ADA-Complaint Procedure

RTA has an internal complaint procedure providing for prompt and equitable resolution of complaints alleging any action prohibited by the U.S. Department of Justice regulations in implementing Title II of the ADA. Title II states, in part, that “no otherwise qualified disabled individual shall, solely by reason of such disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination” in programs or activities sponsored by a public entity.

Complaints should be addressed to:

RTA ADA Coordinator

Julia Roberts, Planning & Innovation Director

Regional Transit Authority of Southeast Michigan

(313) 402-1020

[CivilRights@RTAmichigan.org](mailto:CivilRights@RTAmichigan.org)

A complaint should be filed in writing or verbally, contain the name and address of the person filing it, and briefly describe the alleged violation of the regulations.

A complaint should be filed within 90 days, after the complainant becomes aware of the alleged violations.

Processing of allegations of discrimination that occurred before this grievance procedure was in place will be considered on a case-by-case basis.

An investigation, as may be appropriate, will follow filing of complaint. The investigation must be conducted by the RTA ADA Coordinator or a designee. These rules allow informal but thorough investigations, affording all interested persons and their representatives, if any, an opportunity to submit evidence relevant to a complaint.

1. A written determination as to the validity of the complaint and a description of the resolution, if any, will be issued by RTA, and a copy forwarded to the ADA compliance advisory committee no later than (60) days after its filing.
2. The RTA ADA Coordinator or designee will maintain the files and records relating to the complaints filed.

3. The complainant can request a reconsideration of the case in instances where they are dissatisfied with the resolution. The request for reconsideration should be made within 10 working days to the RTA ADA Coordinator.
4. Following the request for reconsideration, the RTA ADA Coordinator or designee will provide the investigation results and all supporting documentation to the Executive Director as RTA's reconsideration officer for review and determination to submit reconsideration findings to the complainant and the RTA ADA Coordinator within 10 workings days.
5. If these findings differ from those of the original determination, the final determination will be RTA's final response. The right of a person to a prompt and equitable resolution of the complaint will not be impaired by the person's pursuit of other remedies, such as the filing of an ADA complaint with the responsible federal department or agency. Use of this grievance procedure is not a

prerequisite to the pursuit of other remedies. These rules will be construed to protect the substantive rights of interested persons to meet appropriate due process standards and to ensure that RTA complies with the ADA Title II and implementing regulations.



# Resources

## CHECKLIST FOR CREATING ACCESSIBLE WEB CONTENT

This checklist provides basic guidelines for departments to create web content that is accessible to persons with disabilities.

- Check the HTML of all new web pages. Make sure that accessible elements are used, including alt tags, long descriptions, and captions.
- If images are used, including photos, graphics, scanned images, or image maps, make sure to include alt tags and long descriptions of each.
- If online forms and tables are used, make those elements accessible.
- When posting a video, make sure to provide a written transcript.

- When posting documents on the website, always provide them in HTML or a text-based format, even if you are providing them in another format, such as a portable document format (PDF).

## ACCESSIBLE WEB CONTENT REFERENCES

“Web Content Accessibility Guidelines (WCAG) Overview,” World Wide Web Consortium (W3C),

<http://www.w3.org/WAI/intro/wcag>.

“Essential Components of Web Accessibility,” World Wide Web Consortium (W3C),

<http://www.w3.org/WAI/intro/components.php>.

## SECTION 508 STANDARDS

WebAIM Section 508 Checklist:

<http://webaim.org/standards/508/checklist>.

RTA ADA Complaint Form (Add Link here)