

SANTA CRUZ METROPOLITAN TRANSIT DISTRICT

ADMINISTRATIVE CODE

TITLE VII – ADA POLICY AND COMPLAINT PROCEDURES

CHAPTER 1

ADA COMPLAINT PROCEDURE

(This Chapter replaces AR-1002 pursuant to Resolution No. 15-09-02)

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Article 1

General Requirements

- § 7.1.101** It is the policy of the Santa Cruz Metropolitan Transit District (hereinafter Santa Cruz METRO) that all its services, programs, and activities when viewed in their entirety, are readily accessible in accordance with the Americans with Disabilities Act and Section 504 of the Rehabilitation Act of 1973, as amended (hereinafter “ADA/504”).
- §7.1.102** It is the policy of the Santa Cruz METRO that in accordance with ADA/504, no qualified individual with a disability shall, on the basis of disability be excluded from participation in or be denied the benefits of the services, programs, or activities of

Santa Cruz METRO or be subjected to discrimination. Santa Cruz METRO will make reasonable modifications, provide auxiliary aids, and remove barriers in order to provide a transit service that is accessible to and usable by individuals with disabilities.

- §7.1.103** Santa Cruz METRO is adopting this policy in order to affirm its commitment to the ADA/504 statutes and regulations with regard to its services, programs, and activities.
- §7.1.104** Neither Santa Cruz METRO nor its employees or contractors shall retaliate, coerce, intimidate, threaten or interfere with any individual in the exercise of his/her rights pursuant to ADA/504 statutes and regulations or because that individual aided or encouraged any other individual in the exercise or enjoyment of any right granted or protected by the ADA/504 statutes and regulations.
- §7.1.105** Neither Santa Cruz METRO nor its employees or contractors shall discriminate against any individual because that individual has opposed any act or practice made unlawful by the ADA/504 statutes or regulations or because that individual made a charge, testified, assisted, or participated in any manner in an investigation, proceeding or hearing under the ADA/504 statutes or regulations.

Article II

Definitions

- §7.1.201** “**Door-to-Curb service**” refers to the service provided on METRO ParaCruz. The driver will escort the ParaCruz passenger from the entrance of the building from which he/she is being picked up from, and drop the passenger at the curb, as close as possible to the designated entrance of his/her destination.
- §7.1.202** “**Ready window**” refers to the 30-minute period of time that begins ten (10) minutes before a passenger’s scheduled pickup time, and ends twenty (20) minutes after the scheduled pickup time for METRO ParaCruz passengers.
- §7.1.203** “**Reasonable Accommodations**” to make changes to policies, practices, and procedures if needed by an individual with a disability to enable him/her to participate in Santa Cruz METRO’s program or activity, unless providing such accommodation creates an undue financial and administrative burden, or constitutes a fundamental alteration of the program or activity.

Article III

Purpose and Applicability

- § 7.1.301** Every Santa Cruz METRO employee and contractor must adhere to this Policy and procedures, adopted to implement this policy.

§7.1.302 Following this Policy does not relieve a Santa Cruz METRO employee or contractor of complying with applicable Federal and California laws and regulations.

§7.1.203 Members of the public may utilize this Policy to either make a complaint or to request a reasonable modification.

Article IV

Designation of Responsible Employee, Communication and Auxiliary Aids

§7.1.401 The Chief Operating Officer (hereinafter “COO”) or his/her designee shall coordinate Santa Cruz METRO’s efforts to comply with and carry out its responsibilities pursuant to the ADA/504, including any investigation of any complaint alleging Santa Cruz METRO’s noncompliance with the ADA/504 or actions on the part of Santa Cruz METRO that are prohibited by the ADA/504.

§7.1.402 The COO or his/her designee shall ensure that all Santa Cruz METRO’s services, programs, and activities when viewed in their entirety, are readily accessible to those individuals with disabilities as defined in the ADA/504 statutes and regulations and that reasonable modifications are available.

§7.1.403 Should an employee become aware that a Santa Cruz METRO service, program, or activity is out of compliance with the ADA/504, he/she is strongly encouraged to immediately inform his/her supervisor, manager, the COO, District Counsel, or the Chair of the Board of Directors of the noncompliance. Upon receipt of such notification, the investigative procedure set forth in Article IX shall be followed.

§7.1.404 The COO or his/her designee shall make information available to individuals including individuals with disabilities, concerning Santa Cruz Metro’s duties under the ADA/504 and how the ADA/504 applies to Santa Cruz METRO’s services, programs and activities.

§7.1.405 The COO or his/her designee shall take steps to ensure that Santa Cruz METRO can effectively communicate with individuals with disabilities (including applicants, participants and members of the public) as it does with others. Auxiliary aids and services where necessary to afford an individual with a disability an equal opportunity to participate in and enjoy the benefits of a service, program or activity conducted by Santa Cruz METRO shall be provided in accordance with the ADA/504 statutes and regulations. In determining the type of auxiliary aid and service necessary, Santa Cruz METRO will give primary consideration to the requests of the individual with disabilities.

§7.1.406 The COO or his/her designee shall ensure that when Santa Cruz METRO employees communicate with individuals with impaired hearing or speech by telephone that telecommunication devices for the deaf or equally effective telecommunications systems are in place in accordance with ADA/504.

- §7.1.407** The COO or his/her designee shall ensure that interested persons including persons with impaired vision or hearing can obtain information as to the existence and location of accessible services, activities and facilities in accordance with ADA/504.
- §7.1.408** Santa Cruz METRO shall provide signage at all inaccessible entrances to each of its facilities, directing users to an accessible entrance or to a location at which they can obtain information about accessible facilities. The international symbol for accessibility shall be used at each accessible entrance of a facility.
- §7.1.409** The COO or his/her designee shall utilize appropriate Santa Cruz Metro employees or consultants necessary to fulfill Santa Cruz METRO responsibilities pursuant to this policy/procedure.
- §7.1.410** The COO or his/her designee shall ensure that Santa Cruz Metro employees are trained on this policy/procedure in order to ensure compliance.

Article V

Reasonable Modifications/Accommodations

- §7.1.501** Santa Cruz METRO's Fixed Route Operators and Paracruz Operators will provide a reasonable modification at the request of an individual with a disability, provided that the requested accommodation does not fundamentally alter the nature of the service, program or activity, or result in an undue financial and administrative burden.
- §7.1.502** An individual with a disability who wishes to make a request for a reasonable modification shall submit their request to Santa Cruz METRO's Chief Operating Officer (COO). An ADA Request for Reasonable Modification Form (Appendix A) may be used to facilitate this request.
- A. Whenever feasible, requests for reasonable modifications shall be submitted, evaluated and responded to before Santa Cruz METRO is expected to provide the modified service.
- §7.1.503** The COO will evaluate all requests for reasonable modifications, and provide a written response to the individual requestor within ten (10) business days.
- §7.1.504** An individual requesting a reasonable modification shall describe why the requested modification is needed in order to use Santa Cruz METRO's transit services.
- §7.1.505** A request for reasonable modification may be denied only for one or more of the following reasons:
- A. Granting the request would fundamentally alter the nature of the service, activity, or program;

- B. Granting the request would create a direct threat to the health or safety of others (including the driver and/or other passengers);
- C. Without the requested modification, the individual with a disability is able to fully use Santa Cruz METRO's service, activity, or program for their intended purpose; or
- D. Granting the request would cause an undue financial and administrative burden.

§7.1.506 If a request for a reasonable modification is denied, Santa Cruz METRO shall take, to the maximum extent possible, alternative actions (that would not result in a fundamental alteration) to ensure that the individual with a disability receives the services or benefit provided by Santa Cruz METRO.

§7.1.507 If an individual with a disability does not agree with Santa Cruz METRO's decision, he/she may file a grievance with Santa Cruz METRO, as outlined in Article IX of this policy.

§7.1.508 Either the CEO/GM or the District's Board of Directors may respond to a grievance filed under this part that concerns a request for modification.

Article VI

METRO ParaCruz No-Show Policy

§7.1.601 A "No-Show" is defined as follows:

- A. After scheduling a trip, you realize that you no longer need the ride and you fail to call and cancel at least one (1) hour before the start of your Ready Window;
- B. The ParaCruz vehicle arrives within the Ready Window, but the Operator cannot locate you at the requested pick-up location within five (5) minutes; or
- C. The vehicle arrives within your Ready Window but you are not ready to go within five (5) minutes and you do not board the vehicle.

§7.1.602 In the event that you "No-Show" for the first leg of a trip, any subsequent leg or return trip will not be cancelled automatically and may result in an additional "No-Show" assessment if not cancelled as required by this policy.

§7.1.603 In the event that you miss a scheduled ride for any reason, be sure to call METRO ParaCruz to let them know whether or not you still want to keep your other trips on that day.

§7.1.604 If a schedule delay, bad weather, or breakdown causes the METRO ParaCruz service to be late or to miss a pick-up, and you decide to find another way to your appointment, please call METRO ParaCruz and tell them you would still like your return ride.

- §7.1.605** If it is determined by METRO ParaCruz that your “No-Show” was assessed appropriately you shall be notified and shall be advised of the No-Show Policy and the consequences of excessive “No-Shows”.
- §7.1.606** If your ridership establishes a pattern and practice of “No-Shows,” METRO shall provide you with a letter warning that further “No Shows” may result in the loss of service and explaining the terms under which any additional “No-Shows” within the following 30 days may result in a suspension of Paratransit service. If additional “No-Shows” are incurred during the 30-day warning period, METRO may issue a Letter of Intent to Suspend your Paratransit service for a fourteen (14) day period.
- §7.1.607** **How to Request an Appeal Hearing**
- A. You may appeal this determination before any suspension would be imposed and may do so by providing either a written or oral request for an Appeal Hearing to:
- METRO ParaCruz
2880 Research Park Drive, Suite 160
Soquel, CA 95073**
- B. Or you may telephone **(831) 425-4664**
- C. The request for an Appeal Hearing must be made within ten (10) days from the postmark date on the Letter of Intent to Suspend METRO ParaCruz service.
- §7.1.608** If the customer does not appeal the suspension, the suspension shall be scheduled and the customer shall be notified of the dates of the suspension. The customer will be given notice ten (10) days prior to the suspension date.

Article VII

Transportation Services

- §7.1.701** METRO ParaCruz provides Door-to-Curb service upon request. The driver will escort the ParaCruz passenger from the entrance of the building from which he/she is being picked up from, and drop the passenger at the curb, as close as possible to the designated entrance of his/her destination. Door-to-Curb service must be requested at the time a passenger books his/her ride.
- §7.1.702** If a ParaCruz Operator has concerns about a passenger’s ability to get to the door of his/her destination, the Operator may elect to escort the passenger.
- §7.1.703** Neither Santa Cruz METRO nor its employees will discriminate against an individual with a disability in connection with the provision of transportation service.
- §7.1.704** Neither Santa Cruz METRO nor its employees will on the basis of disability, deny to any individual with a disability the opportunity to use its public transportation

service if the individual is capable of using that service with or without a reasonable modification.

§7.1.705 The COO or his/her designee shall ensure that its public transportation service meets the standards and requirements set forth in the ADA/504 statutes and regulations.

Article VIII

Evaluation of Services, Programs and Activities

§7.1.801 The COO or his/her designee shall periodically, but not less than every 2 years, conduct an evaluation of Santa Cruz METRO's current services, programs, and activities and the effects thereof, that may or may not meet the requirements of the ADA/504 statutes and regulations.

§7.1.802 The COO or his/her designee shall review the Santa Cruz METRO's services, programs and activities and prepare an evaluation report for the Board of Directors' review.

§7.1.803 The COO or his/her designee shall provide an opportunity to interested persons, including individuals with disabilities and other organizations representing individuals with disabilities, to participate in the self-evaluation process by submitting comments, to a draft evaluation report.

§7.1.804 The Evaluation Report for the Board of Directors shall include the following:

- A. A list of the interested persons consulted;
- B. A description of areas examined and any problems identified;
- C. If problems are identified, a description of the proposed modification; and
- D. An implementation schedule to ensure that the modifications are made in a timely fashion.

§7.1.805 Once the Board of Directors has accepted the Evaluation Report, the COO or his/her designee shall ensure that the implementation schedule for the necessary modifications is followed in accordance with the adopted schedule.

§7.1.806 This policy/procedure does not require Santa Cruz METRO to take any action that it can demonstrate would result in a fundamental alteration in the nature of its service, program, or activity or in undue financial and administrative burdens. The COO or his/her designee shall make the decision that compliance would result in such alteration or burdens after considering all resources available for use in the funding and operation of the service, program, or activity and such decision must be accompanied by a written statement of the reasons for reaching that conclusion. If an action would result in such an alteration or such burdens, Santa Cruz METRO shall take any other action that would not result in such an alteration or such

burdens but would nevertheless ensure that, to the maximum extent possible, individuals with disabilities receive the benefits or services provided by the Santa Cruz METRO.

Article IX

Grievance Procedure

§7.1.901 Any person with a disability or his/her authorized representative (family member, caregiver, disability advocate, or disability organization, i.e. Central Coast Center for Independent Living, Community Bridges, Senior Network Services, or the like) who believes that Santa Cruz METRO's programs, activities or services are not in compliance with the ADA/504 statutes or regulations shall put his/her concerns in writing, with the complainant signing the document to attest to the accuracy of the complaint (if possible)¹. The complaint can then be directed to any of the following individuals who are required to keep the information contained in the complaint confidential:

1. Santa Cruz METRO
110 Vernon Street
Santa Cruz, California 95060
Attention: Chief Operating Officer
(831) 426-6080-phone (TDD 711 (TTY/Voice))
(831) 426-6117-facsimile
caguirre@scmtd.com

2. Pacific Station
920 Pacific Avenue, Suite 21
Santa Cruz, California 95060
Attention: Accessible Services Coordinator
(831) 423-3868-phone (TDD 711 (TTY/Voice))
(831) 423-1024-facsimile
jdaughert@scmtd.com

3. Customer Service
Pacific Station 920 Pacific Avenue
Santa Cruz, CA 95060
Attention: Supervisor of Customer Service
(831) 425-8600-phone (TDD 711 (TTY/Voice))
(831) 423-1024-facsimile
hforshner@scmtd.com

¹ Representative may sign on behalf of a complainant whose disabilities prevent him/her from being able to execute the document.

§7.1.902 If an individual is unable to utilize a written complaint format, because of a disability, he/she may contact Santa Cruz Metro's Customer Service Supervisor at (831) 425-8600, who will tape record the conversation with the individual's knowledge and consent. The individual making the complaint must identify himself/herself (for verification purposes only) and provide all other necessary information in order for the complaint to be processed. The complaint will be mailed to the individual for verification and signature (if possible). The complaint will not be processed until the complaint is received back by Santa Cruz Metro, signed by the individual or, if unable because of a disability to sign the form, by the representative, as verification of its accuracy.

§7.1.903 The complaint shall identify the service, program or activity, which is alleged to be out of compliance with ADA/504 statutes or regulations. The complaint shall set forth the time, date, place and the circumstances giving rise to the alleged violation and shall identify those individuals who are believed to have information regarding the alleged violation. A complaint must be filed no later than 90 days from the date of the alleged discrimination unless the time for filing is extended by the COO or his/her designee for good cause.

§7.1.904 A complaint form², which is attached to this policy, can be used for this grievance procedure or to appeal a decision related to a request for modification. Complaint forms shall be made available in accessible formats upon request. A complaint form can be obtained by the following methods:

- A. At the Santa Cruz METRO Website, www.scmttd.com;
- B. By calling Santa Cruz METRO's Executive Assistant at (831) 426-6080, (TDD 711 (TTY/ voice)) a complaint form can be mailed;
- C. By calling Santa Cruz METRO's Accessible Services Coordinator at (831) 423-3868, (TDD 711 (TTY/voice)) a complaint form can be mailed;
- D. Complaint forms can be picked up at the following locations:
 1. Customer Service Booth at Pacific Station;
 2. Watsonville Transit Center, 475 Rodriguez Street, Watsonville;
 3. Santa Cruz METRO's Administrative Offices, 110 Vernon Street, Santa Cruz;
or
 4. Accessible Services Coordinator at Pacific Station, 920 Front Street, Suite 21, Santa Cruz.

§7.1.905 If the complaint is received by anyone other than the COO, a METRO employee in receipt of the complaint shall forward it to the COO or his/her designee within 2 working days of receipt. The COO shall immediately provide a copy to the Chair of the Board of Directors, the Chief Executive Officer (CEO)/General Manager, District

² The form is not required to process a complaint. Any written format is acceptable or tape recording as provided in Article 9.02.

Counsel, and the Santa Cruz METRO Manager who is responsible for the program, service or activity that is identified as being out of compliance.

- §7.1.906** The identity of complainants shall be kept confidential, at their election, during the conduct of an investigation, hearing or proceeding conducted pursuant to this grievance procedure. However, when such confidentiality is likely to hinder the grievance investigation, or proceeding, the complainant will be advised for the purpose of waiving the privilege.
- §7.1.907** The Santa Cruz METRO Manager who is responsible for the program, service or activity that is alleged to be out of compliance shall promptly investigate the alleged complaint and shall prepare a written response within 10 working days of his/her receipt of the complaint. The Manager may consult with appropriate Santa Cruz METRO staff in the preparation of his/her response to the complaint.
- §7.1.908** The COO or his/her designee shall then speak (meeting or telephone conversation) with the complainant, at which time the complainant may give written or oral evidence supporting the allegation that provisions of the ADA/504 have been violated. The COO shall review and consider the response prepared by the Manager identified in Article 9.07, all the information provided by the complainant and any other evidence available regarding the allegations in the complaint. The COO shall prepare a written report of his/her findings and if corrective action is required a timetable for the completion of such action.
- §7.1.909** Within 15 working days following receipt of the initial complaint, the COO shall inform the complainant of his/her findings and any corrective action to be taken as a result of the complaint together with the timetable for completion of such action.
- §7.1.910** If the complainant is not satisfied with the findings and/or action of the Chief Operating Officer or his/her designee, then the complainant may file his/her complaint together with any other supporting documentation within 5 working days of his/her receipt of the results of the Chief Operating Officer's investigation, with the Chair of the Board of Directors by providing it to the Executive Assistant, 110 Vernon Street, Santa Cruz, CA, 95060. The Chair of the Board of Directors upon review of the entire file, shall take appropriate action in order to insure ADA/504 compliance. The Complainant shall be notified of what actions, if any, will be taken as a result of the review by the Chair within 10 working days of the Chair's notification that the complainant is not satisfied with the results of the Chief Operating Officer's investigation.
- §7.1.911** The timelines applicable to this procedure may be waived by the COO if he/she finds that there is good cause for a waiver.
- §7.1.912** Santa Cruz METRO shall retain documents arising out of the grievance procedure for at least three (3) years and the COO or his/her designee shall maintain relevant information in a database in a confidential manner.

§7.1.913 Participation in this Grievance Procedure is voluntary. Nothing contained herein shall preclude a complainant from taking any other appropriate legal or administrative action against Santa Cruz Metro, should its programs, services or activities be out of compliance with the ADA/504.

Article X

Appendices

- A. ADA Complaint Form
- B. Complaint Procedures
- C. Notice Under ADA
- D. Request for Reasonable Modification Form

APPENDIX A

COMPLAINT FORM

(For Americans with Disabilities Act (ADA)
Rehabilitation Act of 1973 (504) Complaints)

Please indicate by checking the box, if you wish to have your identity kept confidential

Requested Information	Customer's Response
Name of Complainant:	
Address of Complainant:	
(City, State, Zip)	
Telephone Number:	
E-mail Address: *	
Date of Complaint:	
Date of Violation:	
Time of Violation:	
Place of Violation:	
Bus/Van Number:**	
Bus/Van Route:**	
General physical description of driver**	

Identify service, program or activity out of ADA/504 compliance: _____

Summary of violation (attach additional sheets as necessary): _____

Identify individuals by name and address that have information relating to the violation:

Signature of Complainant/Representative

Date

*Optional
** if applicable

APPENIDX B

COMPLAINT PROCEDURE

1. Return completed Complaint Form within 90 days of the alleged violation to any of the following:

Santa Cruz METRO Administrative Office	Pacific Station	Customer Service Pacific Station
110 Vernon Street Santa Cruz, CA 95060 Attention: Chief Operating Officer (831) 426-6080-phone (TDD 711 (TTY/Voice)) (831) 426-6117-facsimile caguirre@scmtd.com	920 Pacific Avenue, Suite 21 Santa Cruz, CA 95060 Attn: Accessible Services Coordinator (831) 423-3868-phone (TDD 711 (TTY/Voice)) (831) 423-1024-facsimile jdaugher@scmtd.com	920 Pacific Avenue Santa Cruz, CA 95060 Attn: Supervisor of Customer Service (831) 425-8600-phone (TDD 711 (TTY/Voice)) (831)423-1024-facsimile hforshner@scmtd.com

2. The Chief Operating Officer (COO)/designee shall conduct an investigation into the alleged violation. The complainant may be contacted during the course of the investigation;
3. The COO/designee shall notify the complainant of the results of the investigation within 15 working days;
4. If the Complainant is not satisfied with the response from the COO/designee, the complainant may file the complaint, together with any supporting documentation with the Chair of the Board of Directors by providing it to the Executive Assistant, 110 Vernon Street, Santa Cruz, California 95060 within 5 working days of receipt of the response from the COO/designee; and
5. The Chair shall have 10 working days to review the complaint and the investigation and report prepared by the COO/designee and to determine if any additional action needs to occur to ensure compliance with the ADA/504.

APPENDIX C

NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT (ADA)

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (ADA), and Section 504 of the Rehabilitation Act of 1973, as amended (504) the Santa Cruz Metropolitan Transit District (Santa Cruz METRO) will not discriminate against qualified individuals with disabilities on the basis of disability in Santa Cruz METRO's services, programs, or activities. Santa Cruz Metro will not tolerate acts of retaliation against anyone exercising his/her rights under the ADA/504.

Santa Cruz METRO does not discriminate on the basis of disability in its hiring or employment practices. Santa Cruz METRO will not ask a job applicant about the existence, nature, or severity of a disability. Applicants may be asked about their ability to perform specific job functions. Medical examinations or inquiries may be made, but only after a conditional offer of employment is made and only if required of all applicants for the position. Santa Cruz METRO will make reasonable accommodations for the known physical or mental limitations of a qualified applicant or employee with a disability upon request unless the accommodation would cause an undue hardship on the operation of Santa Cruz METRO's business. Santa Cruz METRO will make an individualized assessment of whether a qualified individual with a disability meets selection criteria for employment decisions. To the extent its selection criteria for employment decisions have the effect of disqualifying an individual because of disability; those criteria will be job-related and consistent with business necessity.

Santa Cruz METRO will provide transportation services in accordance with the ADA/504 statutes and regulations. Santa Cruz METRO will provide appropriate auxiliary aids and services, including qualified sign language interpreters and assistive listening devices, whenever necessary to ensure effective communication with members of the public who have hearing, sight, or speech impediments, unless to do so would result in a fundamental alteration of its programs or an undue administrative and financial burden. A person who requires an accommodation or an auxiliary aid or service to participate in a Santa Cruz METRO program, service, or activity, should contact METRO's Executive Assistant at (831) 426-6080 (TDD 711 (TTY/voice)) for assistance as far in advance as possible but not later than 48 hours before the scheduled event.

Santa Cruz METRO will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy.

In order to satisfy itself that it is meeting its obligations under the ADA/504, Santa Cruz METRO has established a grievance procedure for persons with a disability who allege that METRO's services, programs or activities are out of compliance. Should you need a complaint form, to file a grievance, or if you have questions or concerns regarding METRO's compliance with the Americans with Disabilities Act or Section 504 of the Rehabilitation Act of 1973 please contact the Chief Operating Officer at (831) 426-6080 (TDD 711 (TTY/voice)).

APPENDIX D

SANTA CRUZ METROPOLITAN TRANSIT DISTRICT



REQUEST FOR REASONABLE MODIFICATION

This form is to be completed in full by the Customer or his/her Representative.

Customer's Name: _____ Date: _____

Telephone No.: _____ Best time to contact: _____ AM/PM

I am a: (Circle one) ParaCruz client Fixed Route customer

List the Route Number (if applicable): _____

Describe the specific modification to service, program or activity being requested: _____

Will this modification allow you to use the Fixed Route service or ParaCruz service effectively?

Has this modification previously been requested?

****(Remainder of form to be completed by METRO Staff)***

Check here if this form was completed by a METRO Employee.

Employee Name: _____ Signature: _____

REQUEST FOR REASONABLE MODIFICATION: GRANTED ____ DENIED ____

If granted, indicate what modification will be provided. If denied, explain the rationale for this decision:

Management Review:

Date Completed: _____

Manager who assisted in process: _____ Initials: _____
Signature

Approved by Chief Operating Officer: _____ Date: _____