



DATE: Friday, June 17, 2026

TO: RAILS Board of Directors

FROM: Monica Harris, Executive Director

SUBJECT: Americans with Disabilities Act (ADA) Policy and Grievance Procedure

On June 24, the Policy committee voted to recommend the Americans with Disabilities Act (ADA) Policy and Grievance Procedure for approval. This policy, which was prepared for us by our attorney at Ancel Glink and then reviewed by the Policy committee, is intended to provide clear guidelines for how RAILS complies with the Americans with Disabilities Act and provides equal opportunities to participate in and benefit from RAILS programs. It also provides clear procedures for requests for reasonable accommodation and an ADA Grievance Procedure in accordance with Title II of the ADA.

We will ask for your action on this policy at the July meeting.

Americans with Disabilities Act (ADA) Policy and Grievance Procedure

Reaching Across Illinois Library System (RAILS) is committed to complying with the Americans with Disabilities Act (ADA) and provide that individuals with disabilities have an equal opportunity to participate in and benefit from RAILS programs, services and activities.

RAILS will make reasonable modifications to allow that individuals with disabilities have an equal opportunity to enjoy all RAILS programs, services, and activities. However, the ADA does not require RAILS to take any action that would fundamentally alter the nature of its programs or services or impose an undue financial or administrative burden. Accordingly, RAILS will take reasonable steps to:

- (1) Ensure that RAILS' communications with applicants, participants, and members of the public with disabilities are as effective as communication with others;
- (2) Ensure that requests for reasonable accommodations to RAILS policies, practices, and procedures are considered with the goal of avoiding discrimination or disparate opportunities; and
- (3) Ensure that RAILS programs and activities are accessible to people with disabilities.

Requests for Reasonable Accommodation

Individuals requiring reasonable accommodations should notify the ADA Coordinator as soon as possible, but no later than five (5) business days before the scheduled service, program, or activity. RAILS will attempt to accommodate a late request, but late requests may be denied due to an associated administrative burden.

RAILS will engage in an interactive process with qualified individuals with disabilities to identify and provide reasonable accommodations. The ADA Coordinator is responsible for determining whether a request for accommodations will be granted based on the nature of the program, service, or activity involved and whether granting the request would pose an undue hardship or fundamentally alter the nature of the service, activity, or program.

RAILS 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 any services or reasonable accommodations and modifications.

ADA Grievance Procedure

This Grievance Procedure complies with the requirements of the ADA. Anyone may use it to file a complaint alleging disability discrimination in RAILS services, programs, or activities, or benefits by RAILS.

1. Filing a Complaint

- Complaints should be in writing and include the complainant's name, address, and phone number. The complaint should provide the date, location, and information

concerning the issue. Alternative formats for complaints (e.g., interview or audio recording) are available upon request. The ADA Coordinator will document the complaint in writing.

- Complaints should be submitted by the complainant and/or their designee as soon as possible, but no later than 60 business days after the alleged violation.
- Complaints should be filed with the RAILS ADA Coordinator: Joe Filapek, Associate Executive Director (Joe.Filapek@railslibraries.org)

2. ADA Coordinator Review

- Within 15 business days of receiving the complaint, the ADA Coordinator or their designee will discuss (in-person or via phone) the complaint and possible resolutions with the complainant. Within 15 business days of such discussion, the ADA Coordinator or their designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print or audio recording. The response will explain the position of the RAILS and offer options for substantive resolution of the complaint.

3. Appeal to the Executive Director

- If the complainant is unsatisfied with the proposed resolutions, the complainant and/or their designee may appeal in writing (or an alternative format) to the RAILS' Executive Director (Monica Harris, Monica.Harris@railslibraries.org) within 15 business days after receipt of the ADA Coordinator's response.
- The Executive Director or their designee will review and discuss the complaint with the complainant (in-person or via phone) within 15 business days to receive any additional information concerning the issue and to seek a mutually acceptable resolution of the complaint. The Executive Director will provide a written or accessible response within 15 business days of such discussion. The Executive Director's action will be final and conclude the RAILS's grievance procedure.
- All complaints received by the ADA Coordinator and appeals to the Executive Director will be retained by the RAILS for at least three years.

Individuals are protected from retaliation or coercion when pursuing their rights or responsibilities under the ADA.

Nothing contained in this Policy diminishes an individual's ability to file a complaint or charge of discrimination with the U.S. Department of Justice (Civil Rights Division) or the Illinois Department of Human Rights. Individuals should refer directly to those agencies for additional information.

A copy of this Policy is available at the RAILS administrative offices and is posted on the RAILS website. If a person with a visual impairment or other disability inquires about this Policy or about RAILS' ADA compliance or services, staff will read this Policy aloud to the person and/or provide other appropriate ADA services and accommodations.

Adopted by RAILS, _____, 2026.