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SECTION 504 TECHNICAL ASSISTANCE HANDBOOK



Cecil D. Andrus
Governor

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Director

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Idaho Department of Commerce

Technical Assistance Handbook

*For Section 504 of the Rehabilitation Act
and the Americans with Disabilities Act*

This handbook was written and produced by Access Concepts & Training, Inc., under contract to the Idaho Department of Commerce (IDC). The handbook was funded by a grant from the Department of Housing and Urban Development (HUD). (Technical Assistance Grant B-90-SK-ID-0001). IDC is not responsible for enforcement of Section 504 of the Rehabilitation Act and the Americans with Disabilities Act (ADA). The information presented here is intended solely as guidance to comply with IDC requirements, and is not a determination of your legal rights or responsibilities under Section 504 or the ADA. Section 504 and the ADA regulations should be consulted for further, more specific guidance.

This handbook can be ordered through the IDC in large print format, audio tape or computer disk, and in braille. The Idaho Department of Commerce is an Equal Employment Opportunity Employer.

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INTRODUCTION

The Idaho Department of Commerce (IDC) and the Idaho Community Development Block Grant (ICDBG) program are committed to educating local government on the requirements of Section 504 of the Rehabilitation Act and the Americans with Disabilities Act (ADA).

Under Section 504, state and local governments receiving federal assistance are required to make their programs, activities, and services accessible to individuals with disabilities. Title II of the ADA extends this requirement to all state and local governments, whether or not they receive federal funds. Title II applies regardless of the public entity's size and seeks to ensure access to all publicly funded programs, services, and agencies. Public entities that receive federal funds are subject to the requirements of both the ADA and Section 504.

IDC has developed a standardized approach in achieving compliance with these laws. This approach integrates the differences and similarities of 504/ADA and IDC requirements, and also incorporates citizen participation, and civil rights requirements. IDC requires ICDBG grantees to form citizen review committees to help with compliance efforts. Citizen participation requirements within the ICDBG program promote direct involvement with citizens affected by Section 504 and the ADA (504/ADA).

The IDC believes that cities, counties, and individuals with disabilities can work together as a team to promote the exchange of information and develop positive working relationships. Careful planning, aggressive outreach, and a strong commitment by citizens and officials alike are basic building blocks to ensure an on-going accessibility program. The end result is that our communities in Idaho will be accessible for all people.

Each year, IDC reviews its Section 504/ADA outreach activities and redefines its training efforts to better meet the needs of Idaho's cities and counties. In 1993, IDC was awarded a technical assistance grant from the Department of Housing and Urban Development (HUD). To complete the activities of this grant, IDC contracted with Access Concepts & Training, Inc. to:

- ☞ **conduct six regional two-day technical assistance workshops**
- ☞ **provide on-site training to meet the individual needs of each grantee in all regions of the state**
- ☞ **develop a technical assistance handbook to serve as a guide for ICDBG grantees**

How Do I Use this Handbook?

This handbook is a guide for the communities that receive a block grant. The information applies specifically to the ICDBG requirements developed by the IDC. You can use this handbook as a workbook. As you complete the exercises in the handbook, think of your city or county's programs and make notes to address in the self-evaluation. This handbook should not be considered as legal advice in replacement of the federal regulations.

Information from this handbook can help you develop an ongoing accessibility program to make your services, activities, and programs accessible for individuals with disabilities. For further clarification on Section 504 and the ADA, consult the applicable federal regulations and Title I and Title II Technical Assistance Manuals.

Overview of Each Section

Section I of this handbook contains information and written exercises that you will need to read and complete before conducting the self-evaluation of your programs, policies, and procedures. The following is an overview of Section I.

A. Informational worksheets on how to accomplish the following IDC requirements:

- STEP 1: Designate a 504/ADA Coordinator.
- STEP 2: Organize a Citizen Review Committee.
- STEP 3: Develop Your Policy on Nondiscrimination.
- STEP 4: Develop Your Grievance Procedure.
- STEP 5: Provide Effective Communication.
- STEP 6: Provide Auxiliary Aids and Services.

B. Questions on disability, employment, and Title II activities to help you understand common practices of discrimination and recognize common problems in your self-evaluation. Keep in mind that as circumstances change, the answers to these questions may also change. Therefore it is essential that you apply the 504/ADA regulations on a case-by-case basis.

Many of the questions in this section were asked by the participants in the six regional training sessions conducted in the first phase of the IDC technical assistance project. Participants asked similar questions in the Phase I and Phase II National Network Training on the ADA, conducted by Disability Rights Education and Defense Fund (DREDF) and Independent Living Research Utilization (ILRU).

C. A self-evaluation questionnaire to assist in your review of city/county programs, policies, and procedures. You should complete this questionnaire after you work through the activities in areas A and B above. The questionnaire was developed in coordination with Jean Goodenough, Deputy Attorney General of the Idaho Personnel Commission.

Section II of this handbook contains information you will need to complete before developing your **transition plan**. Worksheets are included that focus on structural modifications to make your programs accessible. To conduct the site reviews, contact IDC for the most current checklist. When the final building standards are approved for Title II, a standardized checklist of structural modifications will be available with this handbook. Until the standards are approved, use the Americans with Disabilities Act Accessibility Guidelines (ADAAG).

Section III of this handbook contains a Resource Guide to help you locate auxiliary aids, services, and technical assistance on areas related to 504/ADA or disability. The guide was developed with the assistance of Roger Howard, Thrasher & Howard Access Consultants. This section also contains a list of publications and ADA resources located outside of Idaho.

The **Appendix** contains the IDC Monitoring Guide.

Once you completed all of the exercises and provided all necessary documentation in Sections I and II, you will be prepared to make the changes to comply with IDC, Section 504, and the ADA requirements. *DOCUMENT EVERYTHING THAT YOU DO SO THAT YOU WILL HAVE DEMONSTRATED A GOOD FAITH EFFORT.*

Why Do We Have to Complete a Self-evaluation and Transition Plan?

These documents will help you review your programs, services, and activities in determining what your city or county must do to make your public services available to individuals with disabilities. Your goal is to meet the standard known as "Program Accessibility."

What Does Program Accessibility Mean?

A public entity (state and local government) may not deny the benefits of its programs, activities, and services to individuals with disabilities because its facilities are inaccessible. When viewed in their entirety, a public entity's services, programs, or activities, must be readily accessible to and usable by individuals with disabilities.

This standard is known as "**program accessibility**," and it applies to all existing facilities of a public entity. However, public entities are not necessarily required to make each of their facilities accessible. In many cases, providing access through structural changes may be the most effective way of providing program access. However, program accessibility may be provided in ways other than structural modifications.

When choosing a method for providing program access, a public entity must give priority to the method that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities.

This self-evaluation process is critical in determining how to make your programs accessible. Without a comprehensive evaluation, it is difficult for cities and counties to determine how to make their programs, services, and activities accessible when viewed in their entirety.

Is a City or County Required to Make Programs Accessible If No Individual with a Disability Is Known to Live in the Community?

Yes. You must make city/county programs accessible even if no individuals with disabilities live in the community.

What Are Some Examples of Providing Program Access Without Making Structural Changes?

- purchase equipment
- move programs to accessible locations
- provide qualified aids
- modify existing equipment

What Are Some Examples of Providing Program Access Through Structural Changes?

- build a ramp
- provide accessible parking spaces
- modify the bathrooms
- install curb ramps
- install a lift or elevator

Is There a Time Period for Achieving Program Accessibility?

Public entities were required to achieve program accessibility by January 26, 1992. **If structural changes are needed to achieve program accessibility, they must be made as soon as possible but no later than January 26, 1995.** This 3-year time period is not a grace period; instead, it is a deadline, meaning that all changes must be made as soon as possible.

How Do I Organize the Self-evaluation and Transition Plan?

You should use a 3-ring binder to organize the self-evaluation and transition plan documentation. Tab the sections in your binder to help you locate information easily. Include your resource list and documentation of public relation efforts on 504/ADA.

Why Should I Organize the Documentation in a 3-Ring Binder?

By using a 3-ring binder, you can monitor and update the plans as the city or county progresses in its 504/ADA compliance efforts. If there is a request to review your city's or county's efforts to comply with 504/ADA, all documentation will be organized in one binder. Your plans are living documents to be used, not placed on a shelf and forgotten.



SECTION I: SELF-EVALUATION PROCESS



Why Do We Have to Conduct a Self-evaluation?

The basic mandate of Section 504 and Title II of the ADA states that "*no qualified individual with a disability shall be excluded from participation, denied benefits, services, access to programs, or activities, or be subjected to discrimination by any public entity.*"

All public entities, regardless of size, must conduct a self-evaluation. The self-evaluation is a comprehensive review of the public entity's policies and practices. The self-evaluation includes communication and employment, as well as the policies and practices for all services, programs, and activities. The self-evaluation must:

1. **Identify** any services, policies, or practices that discriminate against or exclude people with disabilities.
2. **Modify** all services, policies, and practices that are discriminatory or exclusionary.

Information to Include in the Self-evaluation

- list of interested persons consulted about the self-evaluation
- description of the areas examined and any problems identified
- description of any modifications made to your policies, procedures, services, and programs

How Long Do We Have to Complete a Self-evaluation?

The self-evaluation *should have been completed by January 26, 1993.* However, public entities have been liable for any discriminatory policies or practices since January 26, 1992. Therefore, if any practices are identified during the review, your city or county must modify them immediately.

How Do We Begin the Self-evaluation Plan Process?

- Compile a list of all city or county programs, activities, and services.
- Gather all materials available that may describe or govern how your programs, services, and activities are administered. Frequently, written information is not available for the committee to review; therefore, it is important to include staff on your committee who understand how your

programs operate. If staff is not available to participate on your committee, schedule interviews to help the committee conduct the self-evaluation.

- Organize the committee members into small groups to work on certain areas of the review process (for example, program policies and procedures, employment, effective communication, notice of nondiscrimination, city/county codes, and ordinances). If you do this, make sure that the small groups take detailed notes so they can present their findings to the entire committee. Remember, their findings will be included in the self-evaluation plan.
- Before the self-evaluation review is started, have your committee members complete the exercises in this handbook. These exercises will help your committee members understand the self-evaluation and transition plan process.
- Use the self-evaluation questionnaire to help guide the committee in the review process.
- Conduct the self-evaluation.
- Ask the committee for their findings and recommendations.
- Develop your self-evaluation plan.
- Present the self-evaluation and transition plan to your city council or county commissioners.

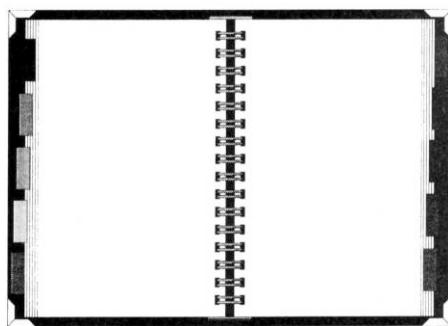
Organize Your Self-evaluation Plan: As you include the documentation on the following items in your self-evaluation plan, check off each item in the list.

Designated Employee

- name of 504/ADA coordinator

Citizen Participation

- name of committee members and their background
- committee meeting minutes
- minutes of city council or commissioner meetings pertaining to ADA/504 issues



Notification of Nondiscrimination

- copy of your policy on nondiscrimination (see page 17 for an example).
- copy of the notice published in the newspaper (see page 16 for an example).
- list of locations where your notice is posted
- description of methods to reach individuals with disabilities

Grievance Procedure

- copy of your grievance procedure (see page 19 for an example).
- statement in your nondiscrimination notice that a grievance procedure is available
- methods on how you will notify the public and staff about your grievance procedure
- steps on how city or county staff will be trained correctly to handle a grievance

Provision of Effective Communication

- copy of your policy on effective communication (see page 22 for an example).
- steps (procedures) that will be taken to ensure that the policy is carried out
- methods on how you will inform the public that your city or county will provide effective communication

Provision of Auxiliary Aids and Services

- description of the methods for providing auxiliary aids and services
- description of how a person with a disability can request auxiliary aids and services
- steps by which you will advertise to individuals with disabilities that the city or county will provide auxiliary aids and services
- description of the methods your city or county will use to ensure that meetings, hearings, and conferences are accessible for individuals with communication disabilities
- description of how your city or county will provide effective communication over the telephone
- description on how your city or county will provide alternative formats for written materials

Self-evaluation Questionnaire

- completion of the self-evaluation questionnaire
- documentation to support answers in the questionnaire
- description of all policies, procedures, or unwritten practices that discriminate or exclude individuals with disabilities
- description of all policies, procedures, or unwritten practices that you will modify to prevent discrimination
- a copy of all final modifications to policies, procedures, and practices (if your self-evaluation determines that structural modifications are necessary, a transition plan must be developed)

Fundamental Alteration and Undue Burden

- policy on using fundamental alteration and undue burden when providing program accessibility (see page 38 for definition).
- written documentation supporting the city or county's reason for claiming this standard
- documentation that all resources available for funding and operation of the service, program, or activity were taken into consideration
- documentation that the decision to claim this standard was made by the head of the city or county
- description of alternative modifications or methods that are feasible to ensure that your city or county does not discriminate

Where Do We Start? Read Section I of this handbook that includes the following activities:

Complete the informational worksheets on pages 9-24. 

- STEP 1: Designate a 504/ADA Coordinator.
- STEP 2: Organize a 504 Citizen Review Committee.
- STEP 3: Develop Your Policy on Nondiscrimination.
- STEP 4: Develop Your Grievance Procedure.
- STEP 5: Provide Effective Communication.
- STEP 6: Provide Auxiliary Aids and Services.

Answer the questions on disability, employment, and Title II activities in local government. Also read the fact sheets included in this section. The questions, answers, and fact sheets are on pages 25-38.

Conduct the self-evaluation using the self-evaluation questionnaire on pages 39-47. Once you have completed all exercises and provided necessary documentation in Section I, you will be ready to go through the exercises in Section II which describes the transition plan process.



504/ADA COORDINATOR

STEP 1: Designate an Individual Who Will Coordinate Your 504/ADA Compliance Efforts.



1. Why Should Your City or County Designate a 504/ADA Coordinator?

- ➲ The coordinator will make sure the self-evaluation and transition plan are completed and that recommendations are done.
- ➲ The coordinator will help put together and coordinate your citizen review committee.
- ➲ The coordinator will draft a Notice of Nondiscrimination and ensure that it is posted regularly.
- ➲ The coordinator will develop a grievance procedure and ensure that it is made available to the public and employees.
- ➲ The coordinator will receive and investigate grievances on city or county programs, services, and employment practices.
- ➲ The coordinator will help organize training activities on Section 504 and the ADA.
- ➲ The coordinator can help monitor and prevent potential discrimination acts.
- ➲ The coordinator can help keep your city or county up to date on 504/ADA regulations.
- ➲ The coordinator is a contact person for individuals with disabilities who is available and knowledgeable on 504/ADA issues.
- ➲ The Department of Commerce requires your city or county to designate a 504/ADA Coordinator.

2. What Are Some Important Qualities That a 504/ADA Coordinator Should Possess to Be Effective?

- ⇒ The 504/ADA coordinator must be an employee of the city or county (if there are no employees, designate a person who has the authority to represent the city or county, such as the mayor, a city council person or a county commissioner).
- ⇒ The 504/ADA coordinator must have the authority, knowledge, and motivation to carry out 504/ADA regulations.
- ⇒ The 504/ADA coordinator should be organized and experienced in collecting and analyzing information.
- ⇒ The 504/ADA coordinator should have the skills to coordinate, train, and motivate a citizen review committee.

3. Who Is Your 504/ADA Coordinator? Fill in the blanks.

NAME _____

TITLE _____

ADDRESS _____

TELEPHONE NUMBER _____

OFFICE HOURS _____

CITIZEN REVIEW COMMITTEE

STEP ②: Organize a Citizen Review Committee That Can Help with Your 504/ADA Compliance Efforts.

1. Why Should Your City or County Use a Citizen Review Committee?

- ➲ The citizen review committee must be organized to help conduct the self-evaluation and transition plan review.
- ➲ The committee can help you identify architectural, communication, and policy barriers that may prevent people with disabilities from accessing your services.
- ➲ The committee can gather input from interested individuals who have expertise with a disability. Their suggestions may provide creative solutions to problems that seem impossible to solve. In addition, their recommendations may be more cost effective and better meet the needs of individuals with disabilities.
- ➲ The committee can help enforce a good-faith effort, and increase public relations, cooperation, and teamwork with your city or county.
- ➲ The committee can initiate public support for the city or county's 504/ADA compliance efforts.
- ➲ The committee can help your 504/ADA coordinator monitor the city or county's progress in eliminating discriminatory practices and structural barriers.
- ➲ The committee members can learn about city or county government and budgetary constraints.



2. How Can Your City or County Organize a Citizen Review Committee?

- ➲ Ask people you know who have a disability.
- ➲ Advertise in the paper, newsletters, posters, grocery stores, and other public places.
- ➲ Designate a member from your committee to chair the meetings of the citizen review committee.

3. How Many People Should Be on Your Committee?

Your committee should not be too big or too small. There is no specific limitation on the number of people you need on your committee. If your committee is too big, it may be difficult to make decisions. On the other hand, if the committee is too small, you may not get a good representation of different ideas and experience. A general standard ranges from four to five people.

Keep in mind that committee members will not possess the same qualities. Therefore, it is important to get a good representation of individuals on your panel. The members of your committee should be made up of individuals who have different disabilities, other interested persons from your community, and staff from your city or county.

4. Overall, Committee Members Should Have the Following:

- ☒ commitment and willingness to participate in training on 504/ADA
- ☒ positive attitude toward civil rights for people with disabilities
- ☒ individuals who have disabilities
- ☒ individuals who work with people who have disabilities
- ☒ knowledge of discrimination and access issues
- ☒ knowledge of your community and your city or county services, and programs
- ☒ knowledge of the Americans with Disabilities Act Accessibility Guidelines (ADAAG)

5. If You Can't Find Individuals in Your Community Who Have Disabilities, What Do You Do?

- ☒ Contact human service groups/organizations.
- ☒ Advertise in your local newspaper, on the radio, in newsletters, and by word of mouth.
- ☒ Go beyond your city or county boundaries.
- ☒ Contact individuals from your resource list.
- ☒ Analyze your community to identify barriers that may prevent individuals from participating in your community's programs, services, and activities.

6. Write down Three to Five Local or Regional Resources That Can Help Identify Individuals Who May Want to Participate on Your Committee. Look in the resource guide.

NOTICE OF NONDISCRIMINATION

**STEP 3: You Must Adopt a Public Policy on
Nondiscrimination and Notify the Public
on an Ongoing Basis That Your City or
County Does Not Discriminate.**



1. Why Is it Important to Develop and Post a Public Notice That Your City or County Does Not Discriminate?

- ➲ Advertise to the public that you are making a good faith effort to comply with 504/ADA.
- ➲ Notify individuals with disabilities that you have a designated 504/ADA coordinator.
- ➲ Help city or county personnel identify and provide auxiliary aids and other services.

2. What Information Does Your City or County Need to Include in the Public Notice?

- ➲ A statement that your entity does not discriminate under Section 504 or the ADA.
- ➲ Your 504/ADA coordinator's name, address, telephone number, and office hours.
- ➲ A statement that your city or county has a grievance procedure available to resolve complaints.
- ➲ A statement that your city or county will provide auxiliary aids and services for the provision of effective communication.

Remember

Depending on the size and location of your city or county, you may want to include a statement in public documents or public hearings that asks for at least three to five day advance notice to request auxiliary aids or services. This advance notice will help you locate effective auxiliary aids or services to meet the effective communication standard. However, the advance notice does not relieve you of the responsibility to be prepared to provide other services that can be provided on request. Your staff should always be prepared for such requests.

3. How Often Should the City or County Post the Nondiscrimination Notice to the Public?

You must publish your policy in the newspaper once a year and post your notice on an ongoing basis. A sample notice and policy are included on pages 16 and 17.

4. Are You Documenting Your Methods and Listing the Locations of Where Your Notice Is Posted? Check all that apply.

- parks and recreation services
- library
- city hall
- courthouse
- police station
- voting polls
- fire stations
- schools
- grocery stores
- churches

5. Do Your Outreach Activities Include the Following Examples to Reach People with Disabilities? Check all that apply and attach documentation.

- Write an article for newsletters and local newspapers.
- Send your notice to disability organizations.
- Send your notice to your local Chamber of Commerce.
- Contact your regional information and referral service.
- Contact the closest government agencies that provide services to individuals with disabilities.
- Include a short paragraph in your legal notices.
- Include a statement in your water and sewer bills.
- Include a notice in your brochures, flyers, and other publications.
- Develop a policy in your procedures handbook.
- Develop public service announcements.
- Provide information to radio reading services provided through the Idaho Commission for the Blind.

6. Have You Identified How Your City or County Provides Information That Is Accessible to Individuals with Visual, Hearing, and Cognitive Disabilities? Check those that apply.

- Place large print notices on bulletin boards.
- Advertise in newspapers that have a large print edition.
- Notify local service organizations that provide services to people with disabilities.
- Post information on bulletin boards that are in wheelchair accessible locations.
- Include open or closed captioning in your public service announcements on the television.
- Provide audio cassette tapes, braille, and large print for written materials.

7. Describe How You Are Prepared to Handle Requests for Auxiliary Aids and Services or Other Accommodations Effectively.



SAMPLE NOTICE ON NONDISCRIMINATION

As required by Section 504 of the Rehabilitation Act (as amended) and the Americans with Disabilities Act (ADA), NAME OF CITY OR COUNTY has adopted by resolution a policy regarding "NONDISCRIMINATION ON THE BASIS OF DISABILITY."

NAME OF CITY OR COUNTY does not discriminate on the basis of disability in the admission to, access to, or operations of programs, services, or activities.

Qualified individuals who need accessible communication aids and services or other accommodations to participate in programs and activities are invited to make your needs and preferences known to the 504/ADA Coordinator. Please give us at least a three to five day's advance notice so we can adequately meet your needs.

An internal grievance procedure is available to resolve complaints. Questions, concerns, or requests for additional information regarding 504/ADA should be forwarded to:

504/ADA COORDINATOR'S NAME_____

TITLE_____

ADDRESS_____

PHONE NUMBER_____ VOICE _____ TDD _____

DAYS AND HOURS AVAILABLE_____

Upon request this notice is available in alternative formats (for example, large print, or audio tape) from the 504/ADA Coordinator.

POLICY REGARDING NON-DISCRIMINATION ON THE BASIS OF DISABILITY

A resolution of the City/County of _____, Idaho adopting a policy of nondiscrimination on the basis of disability.

Whereas, the Congress of the United States has passed Section 504 of the Rehabilitation Act of 1973, which requires that "no otherwise qualified individual with a disability shall, solely on the basis of his or her disability, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program, services, or activities receiving federal assistance"; and

Whereas, the City/County of _____ has applied for/received an Idaho Community Development Block Grant and is required to comply with Section 504 of the Rehabilitation Act of 1973; and

Whereas, the failure to comply with the terms and conditions of Section 504 of the Rehabilitation Act may cause the City/County to lose its grant or eligibility for future grants;

Now, therefore, be it resolved by the Mayor/Commissioner and the Council/Commission of the City/County of _____, Idaho, the following:

Section I. It is the policy of the City/County that all programs and activities shall be accessible to, and usable by, qualified persons with disabilities, in accordance with Section 504 and the Americans with Disabilities Act (ADA).

Section II. That the City/County shall conduct a self-evaluation, with the assistance of a citizen review committee involving individuals with disabilities, of its programs, policies, procedures, and facilities to determine those areas where discrimination may occur.

Section III. The City/County shall, upon completion of the self-evaluation plan, make revisions, modifications, or other changes so as to fully comply with the letter and intent of Section 504 and the ADA.

Section IV. Further, the City/County shall, where building modifications are required, develop and implement a transition plan for eliminating structural barriers in a timely manner in accordance with Section 504 and the ADA.

Citizens may contact (designated employee) at (address), (telephone number) for assistance, or to answer questions regarding this policy during the hours of _____.

Passed by City/County of _____, Idaho

Signed By _____ Title _____
Date _____ Attest _____

GRIEVANCE PROCEDURE

STEP 4: ICDBG Grantees must Adopt a Grievance Procedure for the Public and Your Employees to Resolve Complaints at a Local Level.

1. What Is a Grievance Procedure?

A written description of steps that an employee or citizen can use to resolve a complaint with your city or county.



2. Why Is it Important to Have a Grievance Procedure?

- To resolve complaints within the city or county, rather than have an individual file a complaint with a state or federal agency or file a lawsuit.
- Demonstrate to those who have complaints that you want to make every effort to address their concerns.

3. What Information Should a City or County Include in the Grievance Procedure?

- A detailed description on how to file a grievance.
- A two-step review process that allows for appeal.
- Reasonable time-frames for review and resolution of the grievance.
- Name, address, and telephone number of the person who will receive and follow-up on the grievance.
- A statement that informs individuals that alternative ways of filing complaints, (such as personal interviews or a tape recording of the complaint), is acceptable. See pages 19 and 20 for a sample grievance procedure.

4. How Often Should a Grievance Procedure Be Published?

You need to make sure that you notify the public on a ongoing basis that you have a grievance procedure available for use. A notice about the availability of your grievance procedure should be included in your public notice. See page 16 for an example.

GRIEVANCE PROCEDURE FOR CITY/COUNTY 1994-1995

The following grievance procedure is established to meet the requirements of Section 504 of the Rehabilitation Act as amended and the Americans With Disabilities Act of 1990 (ADA).

According to these laws (*Name of the city/county*), as a recipient of an Idaho Community Development Block Grant (ICDBG) funds, certifies that all citizens shall have the right to submit a grievance on the basis of disability in policies or practices regarding employment, services, activities, facilities, or benefits provided by (*Name of the city/county*).

When filing a grievance, citizens must provide detailed information to allow an investigation, including the date, location and description of the problem. The grievance should be in writing and should include the name, address, telephone number of the complainant. ***Upon request, alternative means of filing complaints, such as personal interviews or a tape recording, will be made available for individuals with disabilities upon request.*** The complaint should be submitted by the complainant or his/her designee as soon as possible, but no later than 60 days after the alleged violation. Complaints must be signed and sent to:

Name/Title of Coordinator _____
Address _____
Telephone Number _____ Voice _____ TDD _____

Within 15 calendar days after receiving the complaint, (*Name of ADA coordinator*) will meet with the complainant to discuss the complaint and possible resolution. Within 15 calendar days after the meeting, (*Name of ADA coordinator*) will respond in writing. Where appropriate, the response shall be in a format accessible to the complainant (such as large print or audio tape). The response will explain the position of (*Name of city/county*) and offer options for resolving the complaint.

If the response by (*Name of ADA coordinator*) does not satisfactorily resolve the issue, the complainant or his/her designee may appeal the decision of the ADA coordinator. Appeals must be made within 15 calendar days after receipt of the response. Appeals must be directed to the chief elected official or his or her designee.

Within 15 calendar days after receiving the appeal, the chief elected official or his or her designee will meet with the complainant to discuss the complaint and to discuss possible resolutions. Within 15 calendar days after the meeting, the chief elected official or his or her designee will provide a response in writing. Where appropriate, the response shall be in a format accessible to the complainant. The response shall be accompanied by a final resolution of the complaint. The 504/ADA Coordinator shall maintain the files and records of (*Name of the city/county*) pertaining to the complaints filed for a period of three years after the grant is closed out.

Other Complaint Procedures

All individuals have a right to a prompt and equitable resolution. Individuals or classes of individuals who believe they have been subjected to discrimination based on disability have several ways to file a grievance:

- use the grievance procedure provided by the public entity
- file a complaint with any agency that provides funding to the public entity
- file with one of the eight federal agencies designated in the Title II regulations

Under Title II, filing a grievance with the public entity's ADA coordinator, filing a complaint with a federal agency, or filing a lawsuit may be done independently of the others. **Individuals are not required to file either a grievance or complaint to bring a lawsuit. Lawsuits may be filed at any time.** The following are four of the eight agencies where a Title II complaint can be filed:

Department of Justice (DOJ)
Civil Rights Division
Public Access Section
P.O. Box 66738
Washington, DC 20035-9998

Department of Housing and Urban Development (HUD)
Community Planning and Development
451 7th Street
Washington, DC 20410-4000

Architectural And Transportation Barriers Compliance Board (ATBCB)
1331 F Street NW Suite 1000
Washington, DC 20004-1111

Equal Employment Opportunity Commission (EEOC)
1801 L Street NW
Washington, DC 20507

PROVISION OF EFFECTIVE COMMUNICATION

STEP 5: Your City or County must Provide Effective Communication in Order for Individuals with Disabilities to Participate in Your Programs, Services, and Activities.



1. What Is Effective Communication?

Public entities are required to ensure that applicants, participants, and members of the general public with disabilities have communication access that is equally effective as that provided to people without disabilities. What is effective for one individual may be different for another individual. Therefore, effective communication must be provided on an individualized basis.

2. How Is Your City or County Providing Effective Communication? Check the methods that you are using. Jot down your own.

- Printed information is available in alternative formats, (large print, audio, braille, readers, etc.).
- Training will be provided to staff on effective communication.
- A resource list of interpreters, auxiliary aids and services, and equipment is used.
- We have a budget for the purchase of auxiliary aids and services.
- We have purchased auxiliary aids and services.

3. Why Is it Important That Your City or County Provide Effective Communication?

- To ensure individuals with disabilities have access to and can participate in services and programs in the same way other individuals in the community who do not have disabilities.
- The law requires that a public entity provide effective communication.
- To prevent potential complaints, federal audits, loss of federal dollars, and lawsuits.

4. Have You Drafted a Policy That Meets the Requirements of the ADA on the Provision of Effective Communication? Here is an example:

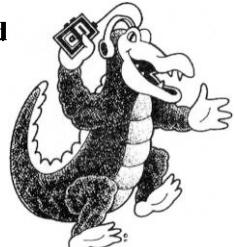
The City/County of _____ will ensure that applicants, participants, and members of the general public who have disabilities are provided communication access that is equally effective as that provided to people without disabilities. Effective communication will be provided through the provision of auxiliary aids and services upon request.

5. Do You Have Procedures That Your City or County Can Use to Carry out Your Policy on Effective Communication? Check the ones that you will use.

- Effective communication will be achieved through the use of auxiliary aids and services upon request of a qualified person with a disability.
- Primary consideration will be given to the individual who requests the auxiliary aid or service.
- A current resource list of organizations, businesses, and individuals is available through our 504/ADA Coordinator to help identify aids and services.
- In choosing equipment or services, the individual requesting the service will first be asked what type of communication aid or service is the most effective.
- If the individual's request cannot be granted, every effort to find other services or equipment that will be equally effective will be provided.
- If for some reason effective communication as requested by the individual cannot be provided, the following steps will be followed:
 1. The individual making the request will be told immediately why their request can't be granted and the reason why the decision was made.
 2. When claiming fundamental alteration or undue burden, the city/county will document the basis for its decision in a written statement and demonstrate that all resources available for the funding and operation of the service, activity, or program were taken into consideration.
 3. The decision not to provide the service must be made by the head of the entity or his/her designee. Any such designee must be a high ranking official, no lower than a department head, having budgetary authority and responsibility for making spending decisions.

AUXILIARY AIDS AND SERVICES

STEP ①: Your City or County must Provide Auxiliary Aids and Services in Order for Individuals with Disabilities to Participate in Your Programs, Services, and Activities.



1. What Are Auxiliary Aids and Services?

To overcome communication barriers, equipment and other services are frequently used for individuals who are blind, visually impaired, deaf, hearing impaired, or speech impaired or who have a cognitive disability. The following are examples of auxiliary aids and services. The majority of this information was provided from the Title II Technical Assistance Manual and the ADA Title II Action Guide for State and Local Governments.

A Qualified Sign Language Interpreter: A qualified sign language interpreter is an individual able to interpret effectively, accurately, and impartially. This includes receptively and expressively using any necessary specialized vocabulary. In most cases it will not be appropriate to use a family member or companion as an interpreter. The person has the right to request an impartial interpreter. **A person who takes a sign language class or knows some sign language is not a qualified interpreter.**

It is important to remember that interpreters have different backgrounds and skills of interpreting. There are different kinds of sign language. Individuals who are deaf may know how to communicate in only one kind of sign language. It is important that you ask the individual who is deaf what kind of sign language that they use. Also ask the individual to refer you to a qualified interpreter that may be available to provide the service.



When is an interpreter required? A note pad and pen for written communication may be sufficient for simple conversation, though an interpreter may be necessary when the information is complex or the exchange is lengthy. Factors to be considered include the:

1. the context of the event
2. the number of people involved
3. the importance of the material being communicated

An example of simple conversation is asking the individual if she or he would need an interpreter or other auxiliary aids or services. Examples of complex communication are a court hearing or a commission or city council meeting. A lengthy meeting may include a public hearing. If the person cannot understand what is being said or communicate to you in writing, an interpreter will probably be necessary. Always ask the individual if they will need an interpreter or another effective means of communication.

Television and Video Productions: Television productions and videotapes produced by a public entity are required to ensure communication access. One way of doing so is through open captioning where you see written words appear on the bottom of your television.



Telephone Communication: If you use the telephone to communicate with the public, equally effective communication with people must be provided, including communication with people having hearing and speech disabilities. Use of a Telecommunication Device for the Disabled (TDD) and a Relay Service are two methods of ensuring telephone access for people who have hearing or speech disabilities.



Emergency Services: Government units that provide direct telephone access to emergency services, such as police and fire departments, must have a TDD. For emergency services, reliance on the relay service is not considered to be an acceptable alternative. Emergency service providers are also encouraged, but not required, to provide their 911 operators with a voice amplification device in the telephone handset so that efforts of a hard-of-hearing person to communicate on the telephone can be assisted, if necessary.



General Information: General information, such as the availability and location of accessible services, activities, and facilities must be provided by all public entities.



Signs: This requirement specifically includes directional signs at inaccessible entrances indicating where an accessible entrance is located. The requirement also requires signs indicating the location of TDDs or TDD pay telephones. See page 53 for accessible sign illustrations.

2. How Do You Decide What Type of Auxiliary Aid or Service to Provide to Individuals with Disabilities?

Always ask the individual who requests the auxiliary aid or service. The ADA states that in choosing an auxiliary aid or service, primary consideration must be given to the aid or service requested by the individual.

3. Where Do You Find Appropriate Auxiliary Aids or Services?

- ☒ Ask the individual who requests the service.
- ☒ Look in the yellow pages.
- ☒ Contact organizations that represent people with disabilities.
- ☒ Refer to the resource list in Section III.

4. Write Down Three Community Resources That Can Assist You in Identifying Auxiliary Aids or Services. Consult the resource guide in the back of this handbook.

ARE THE PEOPLE DESCRIBED BELOW INDIVIDUALS WITH DISABILITIES, AS DEFINED IN THE ADA?

Definition of Disability:

42 USC §12102(2)

A person with a disability is defined as:

- 1) A person with a physical or mental impairment that substantially limits one or more major life activities; or
- 2) A person with a record of such a physical or mental impairment; or
- 3) A person who is regarded as having such an impairment.

For a more detailed definition, consult your Title I Technical Assistance Manual on Employment.

Read each question and mark Yes if you believe the person is a qualified individual with a disability. Mark No if you believe the person is not a qualified individual with a disability.

1. A person tests HIV positive, but shows no signs or symptoms of the disease. yes no
2. A person who has a psychiatric problem is fired because his boss gave him a drug test and found that he used cocaine. yes no
3. A small child is not allowed to go to summer camp because she has a severe behavioral problem. yes no
4. A person who does not read or write very well because he dropped out of school is not hired for a job that requires reading and writing to fill out forms. yes no
5. A person who is legally blind is thrown out of a store because she starts a fight. yes no

6. A person gets very sick whenever she is around chemical solvent used in most buildings and stores. yes no
7. Two people apply for a sales clerk job. One applicant has experience in this area, with excellent references, he has a very bad scar on his face. The other applicant has no experience and gets the job. yes no
8. A person has a blood disease and would not live if she didn't take weekly medical treatments. yes no
9. A person who has not had a seizure in 15 years is denied a job as a bus driver because the company owner remembers the person having seizures as a child. yes no
10. A person was turned down for a job because the employer heard that he lost a job five years ago because he used and was addicted to drugs. yes no



FACT DO YOU KNOW?

THE ADA COVERS NOT ONLY AMERICANS WITH DISABILITIES, BUT ALL INDIVIDUALS WITH DISABILITIES IN THIS COUNTRY, REGARDLESS OF THEIR ETHNIC OR NATIONAL ORIGIN AND REGARDLESS OF THEIR CITIZENSHIP STATUS.

ANSWERS TO QUESTIONS: DECIDING IF A PERSON HAS A DISABILITY

1. **Yes.** This person is considered disabled by the ADA. HIV infections are considered a disability even if the person shows no signs of having the disease.
2. **No.** A person's illegal drug use is not considered a disability under the ADA. Discrimination would have occurred if only the employer had fired the person because of his psychiatric problem.
3. **Yes.** This child is considered disabled because of her mental problems.
4. **No.** This person does not have a disability. If this person had a disability such as dyslexia, which caused him not to read or write, he would be considered as having a disability.
5. **No.** This person is not covered by the ADA in this instance. The person was thrown out of the store because of the fight, not because of the disability.
6. **Yes.** This person has a disability, called environmental illness, and is covered by the ADA.
7. **Yes.** This person has a disability and covered by the ADA. The attitudes that people have toward this individual substantially limits his major life activities in the area of working and earning a living.
8. **Yes.** This person is covered by the ADA. Without weekly medical treatment, this person would die. However, with weekly medical treatments she can do her major life activity.
9. **Yes.** This person is covered by the ADA because she has a history of a disability.
10. **Yes.** This person has a disability and is covered by the ADA. Individuals who do not use drugs now but have a history of drug addiction are covered by the ADA.

TITLE II QUESTIONS IN LOCAL GOVERNMENT

Check Yes if the situation is a violation of the ADA. Check No if the situation is not a violation of the ADA.

1. A county government sponsors a health class for people who are soon to be parents. The class is held on the third floor of a county building that has no elevator. Is this a violation of the ADA? yes no

2. Only those people who live in the county and are soon to be parents are allowed to attend the class for people expecting a child. Is this a violation of the ADA? yes no

3. The county office does not allow people with mental illness inside its offices. Is this a violation of the ADA? yes no

4. The city hosts a conference of the PTA (Parents and Teachers Association) in a building that is inaccessible. Two parents who are PTA members use wheelchairs. Has the ADA been violated? yes no

5. Under the ADA, is a city's main library required to have a TDD? yes no

6. Is the requirement to provide reasonable accommodation to a person with a disability when hired for a job any different for a city than a private company? yes no

7. A city office publishes a pamphlet on issues that will be discussed each time the city holds an election. A person who is blind requests the pamphlet in braille. The city office sends the individual an audio tape instead of the booklet in braille. Is this a violation of the ADA? yes no

8. A county program provides free meals to low-income Vietnam veterans and requires each person to show a drivers license as identification. Is this a violation of the ADA? yes no
9. There are no accessible restrooms in the county library. If restrooms are provided for non-disabled library patrons, is the library program accessible when viewed in its entirety? yes no
10. A city zoning ordinance requires the front entrance of a business to create a setback by 12 feet from the curb. To install a ramp at the front entrance of a pharmacy, the owner must encroach on the setback by three feet. The city won't allow the owner to build the ramp. Is this a violation of the ADA? yes no
11. The county charges individuals with disabilities for interpreters, for large print, and for the use of FM amplification systems. Is this a violation of the ADA? yes no

ANSWERS TO TITLE II QUESTIONS IN LOCAL GOVERNMENT

1. **Yes.** The county must provide program access to the class. However, it does not have to make the third floor accessible. Instead, the class should be moved to another building or to a floor that is accessible.
2. **No.** The requirements of being a parent and living in the county do not screen out persons with disabilities. However, if individuals who have disabilities live in the county, and are soon to be parents, are not allowed to attend, this would be a violation of the ADA.
3. **Yes.** Preventing any person with a disability from this office is a violation of the ADA.
4. **Yes,** unless the city moves the PTA conference to a building that is accessible.
5. **Yes,** unless an equally effective telecommunications system is provided.
6. **No.** The requirement to provide job accommodations for a person with a disability is the same for a city, county, or state government.
7. **In most cases** this would be a violation of the ADA. The city is required to provide effective communication in a manner that enables the individual to participate on an equal basis with all others. The city must give each person who has a communication impairment the opportunity to request the auxiliary aid or service of his or her choice.
8. **Yes,** because some veterans may not have a drivers license because of blindness or some other disability. The county must accept other forms of identification.
9. **Yes.** The library must provide accessible restrooms if it provides restrooms for persons without disabilities.
10. Granting a variance in the zoning requirement **may be** a reasonable modification of the city policy.
11. **Yes.** The county must provide effective communication where necessary to ensure equal access to programs and activities. However, the county cannot charge for this service.

COMMON QUESTIONS & ANSWERS

Can We Carry Individuals with Disabilities Upstairs Instead of Making Structural Modifications or Relocating Our Programs?

Carrying Is Not Allowed (28 CFR §35.150 (b) (!) & DOJ Title II T.A. Manual, p. 20).

Carrying an individual with a disability is considered an **ineffective and therefore unacceptable method for achieving program accessibility**. Carrying is not permitted as an alternative to structural modifications, such as putting in a ramp or a lift.

Carrying is allowed only in very rare and manifestly exceptional cases, such as onto an oceanographic vessel (such as a submarine) where physical access either cannot be provided or is prohibitively expensive.

Also, when program accessibility in existing facilities may be achieved only through structural alterations, carrying may serve as a temporary expedient until construction is completed.

However, even in these two rare situations where carrying can be justified, all persons involved in the carrying must be formally instructed in the safest and least humiliating methods of carrying.

Instead of Making the Front Door Accessible and Putting in a New Elevator, Can We Use the Back Door and Our Freight Elevator?

Back Doors and Freight Elevators, are Allowed Only as Last Resort - (DOJ Title I T.A. Manual, p.19).

Back doors and freight elevators may be used to satisfy the program accessibility requirement **only as a last resort and only if they provide accessibility comparable to that provided to persons without disabilities**. A back door is acceptable only when the following criteria is met:

- ✓ If the back door is kept unlocked during the same hours that the front door remains unlocked.
- ✓ The passageway to and from the door is accessible, well lit, clear of obstructions and clean.
- ✓ An individual with a mobility impairment does not have to travel excessive distances or through public areas such as kitchens and storerooms to gain access.
- ✓ A freight elevator is acceptable if it is upgraded for general passengers.
- ✓ The passageways leading to and from the elevator are well-lit, clear of obstructions, and clean.

HISTORIC PRESERVATION

28 CFR §§35.104, 35.150(a)(2), 35.150(b)2)

What Is a Historic Preservation Program?

"Historic preservation programs" are programs that have preservation of historic properties as a primary purpose.

How Do We Provide Program Access in Historic Programs?

In providing program access, a state or local government is not required to take any action that would threaten or destroy the historic significance of a historic preservation program housed in a historic property.

What are Historic Properties?

Historic properties are those listed or eligible for listing in the National Register of Historic Places, or designated as historic under a state or local law.

What Should a City or County Do If They House Their Non-historic Programs in a Historic Building?

If a program occupies a historic property but does not have historic preservation as a primary purpose, the special accessibility provisions described in the following section cannot be used.

As a result, you will have to make structural changes that don't destroy the historical significance of the building. Other ways may include the relocation of your programs to a different facility or finding alternative ways to provide program access. Consult the *Title II Technical Assistance Manual* for further detail. This manual is available through the IDC.

Some Examples of Non-historic Programs are:

water and sewer
city council meetings
motor vehicles
police department
planning and zoning

Is There a Priority List for Providing Program Access?

When providing program access to historic preservation programs in historic properties, state and local governments must give priority to methods that provide independent physical access.

When physical access is not required because it would threaten or destroy historic significance, alternative methods of providing program access must be provided. However, this exception is to be applied only in those very rare situations in which it is not possible to provide access to a historic property using the special access provisions established by the UFAS or ADAAG technical standards.

In such situations, alternative methods may include:

- ✓ using audio-visual materials and devices to depict inaccessible portions of a historic property
- ✓ assigning aides to guide persons with disabilities through those parts of the historic property that would be inaccessible without the guide
- ✓ adopting other innovative methods

EMPLOYMENT FACTS

**All State and Local Governments Are Covered,
Regardless of Size and Number of Employees**

Remember

State and local governments cannot discriminate against job applicants and employees with disabilities regardless of how many people they employ. For example, even if a city has one employee, it cannot discriminate in employment.

Where Are Employment Complaints Filed?

Idaho Human Rights Commission

450 West State St.
P.O. Box 83720
Boise, Idaho 83720-0040
(208)334-2873 (Voice) collect if out of area
(208)334-4921 (TDD) collect if out of area

Department of Housing and Urban Development

Community Planning and Development
451 7th Street
Washington, D.C. 20410-4000
(202)708-0270

Equal Employment Opportunity Commission

1801 L Street, NW
Washington, DC 20507
(800)669-EEOC (Voice)
(800)800-3302 (TDD)

For Your Information

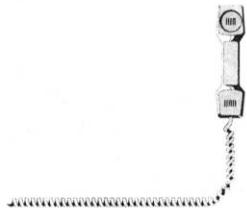
Private employers are only subject to Title I of the ADA if they have 15 or more employees. In Idaho, the Human Rights Act prevents private employers who have five or more employees from discriminating against job applicants and employees with disabilities.

Who Do I Call About Employment Questions?

In Idaho, the Human Rights Commission is the designated state agency that investigates employment discrimination. Since July 1988, the Idaho Human Rights Act has prohibited disability discrimination in employment.

The staff at this agency are very helpful and knowledgeable on the ADA and other Civil Rights Laws.

**If You Are Unsure about
Your Employment Practices,
Give The Commission a Call
for Advice or Training.**



Can Lawsuits Be Filed Against State and Local Government?

Lawsuits may be filed against Title II entities (state and local government) at any time. An administrative complaint does not have to be filed with a federal or state agency designated to investigate the

discrimination charge. Individuals with disabilities (or organizations representing individuals with disabilities) may file lawsuits.

HOW MUCH DO YOU KNOW ABOUT THE EMPLOYMENT REQUIREMENTS?

Read each situation and mark the corresponding box if you believe the employer is asking either legal or illegal questions or is otherwise violating the ADA. If there is not enough information to determine whether the question is legal or illegal, mark "not enough information."

1. For a job where lifting a 35-pound weight is a marginal function of the job, the application contains the question, "Can you lift a 35-pound weight?"
 legal illegal
 not enough information

2. In an interview for a job where lifting a 35-pound weight is a marginal function, the employer asks, "Can you lift a 35-pound weight?"
 legal illegal
 not enough information

3. On an application is the question, "Do you have a physical impairment that would keep you from performing this job?"
 legal illegal
 not enough information

4. In an interview, the employer asks, "Have you ever seen a psychologist?"
 legal illegal
 not enough information

5. In an interview, the employer asks, "Have you ever been hospitalized? If yes, what was the reason?"
 legal illegal
 not enough information

6. In an interview, the employer asks, "How much alcohol do you drink?"
 legal illegal
 not enough information

7. In an interview, the employer asks, "Have you ever filed for Workers' Compensation Insurance?"
- legal illegal
 not enough information
8. On an application appears the question, "Will you need a reasonable accommodation to take a written, timed pre-employment test?"
- legal illegal
 not enough information
9. On the application appears the question, "Can you perform this job with or without a reasonable accommodation?"
- legal illegal
 not enough information
10. In the interview for a word processing job, the question is asked, "What reasonable accommodations will you need if you are hired?"
- legal illegal
 not enough information
11. On an application appears the statement, "At the bottom of this form is a section asking affirmative action information regarding race and disability status. Answering these questions is purely voluntary and will not be used to disqualify you for this job."
- legal illegal
 not enough information
12. In the interview, the employer asks a person with an obvious physical disability to describe how she will perform a certain function, but the employer has not asked the same question of the other applicants who were interviewed.
- legal illegal
 not enough information
13. After the interview, the employer conducts drug and alcohol tests on each applicant.
- legal illegal
 not enough information

ANSWERS TO EMPLOYMENT QUESTIONS

1. This is a legal question. Employers may ask if applicants can perform marginal functions, though negative employment decisions may not be based on their inability to perform marginal functions because of disability.
2. This is a legal question. The rules for interviews are the same as the rules for applications.
3. This is an illegal question because it asks about disability.
4. This is an illegal question because the answer may reveal information about the applicant that could suggest that he or she has a disability.
5. This is an illegal question because the answer may reveal information about the applicant that could suggest that he or she has a disability.
6. This is an illegal question because the answer may reveal information about the applicant which could suggest that he or she has a disability. "Do you drink?" is permissible, but not "How much alcohol do you drink?"
7. This is an illegal question because the answer may reveal information about the applicant that could suggest that he or she has a disability.
8. This is a legal question. Employers may ask if applicants will need a reasonable accommodation to take a test.
9. This is a legal question. Employers may ask whether applicants can perform job functions with or without reasonable accommodation.
10. It is unclear whether this question violates the ADA. It is legal to ask if an applicant can perform job functions with or without a reasonable accommodation. However, it may not be legal to ask about other kinds of accommodations, such as accommodations needed to enjoy equal benefits and privileges of employment that are available to other employees.
11. This is an illegal question unless the employer is required to do affirmative action by Section 503 of the Rehabilitation Act of 1973 or another federal law.
12. This does not violate the ADA if the person's disability might interfere with or prevent the performance of the job function. If the disability will not interfere with or prevent the performance of the job function, the employer may only request the description of how the applicant will perform the job function (if the request is made to all applicants for the same job).
13. At this point in the application process, before a job has been offered, the drug test is legal but the alcohol test is not. An alcohol test is considered a medical examination and is therefore only legal after a conditional job offer.

NONDISCRIMINATION THROUGH CONTRACT



What Is the Responsibility of a City or County That Enters into a Contract with a Private Entity?

A city or county that enters into a contract with a private entity must ensure that the activity operated under the contract is in compliance with Section 504/ADA. Responsibility extends only to the activity that is under contract by the city or county. The city or county is not responsible for ensuring compliance of the other activities of the business that are not involved in the contract.

Example

If a city has a contract with a private organization to run a golf course, the city is responsible for ensuring that the golf course is operated in compliance with the ADA. However, if the same organization also operates other programs not funded by the city, the city bears no responsibility for any discriminatory activity in the other programs, simply because of the contract for the golf course.

If a county has a contract with a private non-profit organization to run a senior center, the county is responsible for ensuring that the senior center is operated in compliance with the ADA. However, if the same private non-profit organization also operates other programs not funded by the county, the county bears no responsibility for any discriminatory activity in the other programs simply because of the contract for the senior center.

When government and private entities act jointly, the government entity must ensure that the Title II requirements are met, while the private entity must ensure that the public accommodations requirements are met.

For example, if a city engages in a joint venture with a corporation to build a new professional sports stadium, the stadium must be built in compliance with the accessibility provisions of both Title II and Title III. In cases where the standards differ, the stadium would have to meet the standard that provides the highest degree of access to people with disabilities. The information is provided by DREDF and can be located in their training handbook, "Explanation of the Contents of the Americans With Disabilities Act."

UNDUE BURDEN AND FUNDAMENTAL ALTERATION

What Does *Undue Burden* Mean?

Title II (state and local government) requires a public entity to make its programs accessible in all cases, except where to do so would result in a fundamental alteration in the nature of the program or in undue financial or administrative burdens.

Congress intended the "undue burden" standard in Title II (state and local government) to be significantly higher than the "readily achievable" standard in Title III (places of public accommodation in the private sector).

In other words, although Title II may not require removal of barriers in some cases where removal would be required under Title III, the program access requirement of Title II should enable individuals with disabilities to participate in and benefit from the services, programs, or activities of public entities **in all but the most unusual cases**.

Does a Public Entity Have to Develop Alternative Methods If it Claims the Undue Burden Standard?

The undue burden standard does not relieve a city or county of all obligations to individuals with disabilities. A public entity is not required to take actions that would result in a fundamental alteration in the nature of a service, program, or activity, or a result in undue financial and administrative burdens. However, **it nevertheless must take any other steps necessary to ensure that individuals with disabilities receive the benefits or services provided by the public entity.**

Four Areas That must Be Considered to Claim this Standard

If a city or county determines that providing program access in certain areas would result in a financial or administrative burden, the following four areas must be considered:

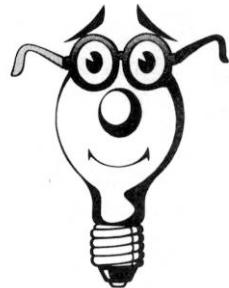
- 1) The city's or county's resources available for use in the funding and operation of the service, program or activity.
- 2) The burden of proving this standard rests with the public entity.
- 3) The decision that compliance would result in such alteration or burdens must be made by the head of the public entity or his or her designee having budgetary authority and responsibility for making spending decisions.
- 4) A written statement of the reasons for reaching this conclusion.

What Happens If Someone Disagrees with the City's or County's Decision to Claim Undue Burden?

A lawsuit or complaint may be filed by any person who believes that he or she or any specific class of persons has been injured by a chief elected official's decision or failure to make a decision.

SELF-EVALUATION QUESTIONNAIRE

The following questions will help you complete your self-evaluation. The questions are organized into five areas: 1) Program Policy and Procedures, 2) Employment, 3) Effective Communication, 4) Notice of Nondiscrimination, and 5) Grievance Procedure. Mark Yes or No for each question. Be prepared to provide written documentation to support your answers.



Program Policy and Procedures

1. Does your city or county have a written policy stating that it does not discriminate against people with disabilities? yes no

2. Does your staff know and understand about your commitment not to discriminate? yes no

3. Does your city or county provide training on 504/ADA, (including access issues, sensitivity and awareness) on different disability groups? yes no

4. Do you have a designated coordinator for the Section 504 Rehabilitation Act and the Americans With Disabilities Act (ADA) compliance requirements? yes no

5. Do you identify the persons with disabilities and other individuals who helped in your self-evaluation, and is their participation described? yes no

6. Do you briefly describe your city or county programs and services, including their purpose, scope, activities, and participants? yes no

7. Do you list and review the resource manuals that govern your programs, including laws, statutes, rules, policies, manuals, ordinances, and other guidelines? yes no
8. Do you describe any services provided by your agency to particular disability groups? yes no
9. Do you have a separate or special program for individuals with disabilities? yes no
10. If yes to #9, do you have written procedures to ensure that these individuals may also participate in programs available to the public? yes no
11. In the following areas, do you describe any program eligibility, admission requirement, or licensing standards that an individual must meet before qualifying for a benefit or service provided by your city or county that may directly or indirectly affect individuals with disabilities. **For any item marked yes, describe the steps taken to modify your agency's policies, practices, and procedures.**
- a. Deny a qualified individual with a disability the opportunity to participate in or benefit from the aid, benefit, or service? yes no
- b. Afford an opportunity for participation or benefit that is not equal to that afforded others? yes no
- c. Provide a qualified individual with a disability with an aid, benefit, or service that is not as effective in affording equal opportunity to obtain the same result, gain the same benefit, or reach the same level of achievement as that provided to others? yes no
- d. Provide different or separate aids, benefits, or services to individuals with disabilities unless necessary to make them as effective as those provided to others? yes no

- e. Provide assistance or contract with a person or entity that discriminates based on disability? yes no
- f. Deny a qualified individual with a disability the opportunity to participate as a member of planning or advisory boards? yes no
- g. Limit the enjoyment of a qualified individual with a disability any right, privilege, advantage or opportunity enjoyed by other qualified individuals who receive your services? yes no

Employment

1. In the following areas, do you describe your policies, practices or procedures that are followed to ensure that there is no discrimination based on disabilities.
- a. Recruiting advertisements yes no
- b. Processing of applications yes no
- c. Employment testing yes no
- d. Interviewing and orientation yes no
- e. Promotion, transfer, demotion, lay-off, or reinstatement, including changes in compensation resulting from these actions yes no
- f. Job assignments yes no
- g. Job classifications, use of vacation and sick leave, unpaid leave of absence, or compensatory time yes no

- h. opportunities for and financial support of training opportunities, conferences, health and insurance benefits, agency-sponsored activities, including recreational or social programs yes no
2. Do you describe how you ensure that any employment-related criteria (including minimum qualifications and testing requirements) which would adversely affect the opportunities of individuals with disabilities are related to the job and are a business necessity? yes no
3. Do you describe how your city or county responds to a request for an accommodation in testing and interviews? yes no
4. Do you describe the steps taken to ensure that nondiscriminatory questions are asked in a hiring interview? yes no
5. Do you describe the steps that are taken to determine if an individual with a disability is capable of performing the essential functions of a particular job, with or without a reasonable accommodation? yes no
6. Do you describe the process the city or county uses to determine whether a request for a reasonable accommodation on the job can be granted or would cause undue hardship? yes no
7. Do you describe your city or county's policy and procedures for maintaining the confidentiality of employee medical information, voluntary self-identification of disability, and requests for accommodation? yes no
8. Do you describe the training or other measures taken to ensure that employees and supervisors do not subject individuals with disabilities to discrimination because of insensitivity or lack of knowledge? yes no

Effective Communication

1. Do you describe the steps taken by your agency to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others?

yes no

2. If any written materials are provided by your program or services, are the following alternatives provided?

- a. audio tape
- b. braille
- c. reader
- d. aide
- e. mailed to home
- f. large print
- g. interpreter
- h. other assistance

yes no
 yes no

3. Do you describe the auxiliary aids and services that will be provided to individuals with a disability?

yes no

4. Do you describe how an individual with a disability may request assistance and express their preference for auxiliary aids and services?

yes no

5. Do you describe how your city or county regularly advertises to the public that you will provide auxiliary aids and services for effective communication to participate in your programs and services?

yes no

6. Do you describe how your city or county will ensure that meetings, hearings, and conferences will be accessible for individuals with communication disabilities?

yes no

7. Do you describe how the city or county will provide auxiliary aids or services on request?

yes no

8. Do you describe how your city or county will use TDD (telecommunication device for the disabled) or the state relay system to communicate with those who have impaired hearing or speech, including training of staff? yes no
9. Do you have a 911 emergency service? yes no
10. If yes to #9, is there a TDD connected to this service? yes no
11. If you use relay services, do you list the name of the company and type of services provided? yes no
12. Are your TDD or relay service phone numbers printed on agency brochures, notices, and letterhead listed in telephone directories? yes no
13. Does your city or county have an 800 number? yes no
14. If yes to #13, do you describe how the city or county has made the 800 number usable by persons with hearing impairments? yes no
15. Do you let the public use your telephone? yes no
16. If yes to #15, is there at least one designated phone that is hearing-aid compatible? yes no

17. If your city or county determines that equally effective communication cannot be provided, do you have the following:
- a. a statement included in your self-evaluation from the head of your agency or designee yes no
 - b. reasons why the service, program or activity would be fundamentally altered or would result in undue financial and administrative burdens yes no
 - c. a description of what other action will be taken to provide the benefits or services to the maximum extent possible yes no

Notice of Nondiscrimination

- 1. Does your self-evaluation include a copy of your Notice of Nondiscrimination? yes no
- 2. Does your notice include the following information?
 - a. a statement that your entity does not discriminate under Section 504 or the ADA yes no
 - b. your 504/ADA coordinator's name, address, telephone number, and office hours yes no
 - c. a statement that asks individuals to give at least three to five day's advance notice to request auxiliary aids or other services yes no
 - d. a statement notifying individuals about the availability of alternative formats yes no
 - e. a statement that your city or county has a grievance procedure available to resolve complaints yes no

3. Do your written materials contain a notice that your city or county complies with Section 504/ADA and will offer accommodations for individuals with disabilities? yes no
4. Are you documenting methods on how you will make your notice available to the public on an ongoing basis? yes no
5. Are you publishing your policy of non-discrimination in the newspaper once a year? yes no

Grievance Procedure

1. Have individuals with disabilities used your services in the past? yes no
2. Have there been obvious difficulties or complaints about your services from individuals with disabilities? yes no
3. If yes to #2, do you document the problems and steps to resolve these concerns? yes no
4. Do you have written procedures on how to deal with those specific problems or complaints? yes no
5. Do you have written procedures on what to do if your city or county cannot accommodate a person with a disability? yes no
6. Does your self-evaluation include a copy of your grievance procedure? yes no

7. Does your plan include action steps to notify the public on an ongoing basis about your grievance procedure? yes no
8. Does your grievance procedure include a statement allowing an individual to submit a grievance in alternative formats? yes no
9. Does your grievance procedure include a time limit to file a grievance procedure? yes no
10. Does your grievance procedure inform individuals of their right to file a complaint with a state or federal agency including the agency's addresses? yes no

SECTION II: TRANSITION PLAN

IDC Transition Plan Requirement

The IDC requires all entities who receive an ICDBG grant to complete a transition plan. A grant can assist in the removal of architectural barriers. Contact IDC for further details.



What Information Do We Include in the Transition Plan?

The Transition Plan shall, at a minimum:

1. **Identify** physical obstacles in your facilities that limit the accessibility of programs or activities to individuals with disabilities.
2. **Describe** in detail the methods that your city or county will use to make the facilities accessible.
3. **Schedule** for the removal of barriers. If it takes longer than one year to remove barriers, identify steps that will be taken during each year of the transition period.
4. **Indicate** the official responsible for carrying out the plan.

If your city or county is responsible or has authority over streets, roads, or walkways, the transition plan shall include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs. When developing a schedule to provide curb ramps, the ADA stipulates a priority list: government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.

How Long Do We Have to Remove Physical Barriers?

Structural changes will be necessary if there is no way to make your programs accessible through nonstructural modifications, unless your entity can show undue burden. Structural changes must be made as soon as possible, but no later than January 26, 1995.



How Does Our Committee Begin the Transition Plan Process?

1. Make a list of all city or county owned facilities. For example, sidewalks, libraries, fairgrounds, tennis courts, swimming pools, transportation facilities, police departments and parks.
2. Schedule your site reviews in coordination with your committee members.
3. Organize your team reviewers with the necessary tools to conduct the site reviews. These tools include the *Americans with Disabilities Act Accessibility Guidelines (ADAAG)* checklist, tape measure, fish scale, and pencils. A copy of the checklist can be obtained from IDC. A tape recorder and camera can also help you record areas that may be difficult to describe in writing.
4. Conduct your site reviews. Make sure your teams keep clear and concise notes.

Organize Your Transition Plan to Include the Following Documentation: Check the items as you include them in your transition plan.

- a review of all facilities including buildings, sidewalks, parks and any other structure where services are provided
- an ADAAG checklist completed on each of your structures and facilities
- the identification of all architectural barriers
- description of modifications to correct barriers
- committee input to help prioritize the modifications that must be made
- completion dates to remove these barriers

QUESTIONS ON STRUCTURAL MODIFICATIONS

What Kinds of Accommodations Can Be Made at No Cost? Check the modifications that you can do.

- rearrange furniture
- adjust the door closure
- move meetings to an accessible floor
- prop open a door with a door stop
- provide curb service
- remove garbage cans, plants, ashtrays out of the way of elevator buttons

What Accommodations Can Be Made at a Minimal Cost? Check the modifications that you can do.

- install grab bars in toilet stalls
- relocate paper towel dispensers
- enhance lighting with higher watt bulbs
- install full length mirrors in bathroom

Answer Questions on Structural Modifications. Check either the yes or no box.

1. In new construction, does every feature have to be accessible? YES NO

2. Is there a difference between the ADAAG and UFAS standards? YES NO

3. Are state and local government allowed to use the elevator exception discussed in the ADAAG standards? YES NO

4. Is there a way to determine if an architect uses the ADAAG or UFAS standards? YES NO
5. Can we use the Uniform Building Codes (UBC) to replace the ADAAG and UFAS standards? YES NO
6. Is there a local entity where we can purchase accessible signs for parking, building directories, elevators, and offices? YES NO
7. We have hired an employee who uses a wheelchair. The person is able to perform the essential functions of the job but needs some modifications to the job site. Is there a business that provides consultation to make sure the modifications are performed correctly? YES NO
8. We need to make the playgrounds at our city parks more accessible. Are there standards for accessible designs, including playground equipment and materials? YES NO
9. When making modifications to parks and outdoor recreation sites, is there a way to prioritize the barrier-removal process? YES NO

ANSWERS TO QUESTIONS ON STRUCTURAL MODIFICATIONS

1. **Yes.** Currently, the ADAAG and UFAS standards are the building standards for Title II (local and state government). Title II entities have a choice in applying these standards in new construction and remodel of publicly funded facilities. Almost all features of a new facility must be accessible. Some areas, such as catwalks and crawl spaces, are not covered by the ADAAG.
2. **Yes.** Title II Technical Assistance Manual, page 23, highlights the differences between these standards. In the near future, the federal government will finalize standards specifically for state and local government. It is anticipated that the ADAAG and UFAS will be combined. However, until this time you will use either ADAAG or UFAS.
3. **No.** The elevator exemption applies only to private business. Consult your Title II Technical Assistance Manual, page 23, for further detail.
4. **Yes.** Architects should demonstrate a working knowledge of these standards. Ask your designer if she has a copy of the ADAAG and UFAS standards and ask for references on other projects. There are a number of individuals with disabilities in your region who understand and work with these standards; ask them to help you review the plans before construction begins.
5. **No.** The UBC does not meet all of the requirements in the ADAAG. At this time, you will be out of compliance with 504/ADA, if you use the UBC to replace the ADAAG standards.
6. **Yes.** The Idaho Correctional Industries sign shop can produce almost any kind of sign. They have the ability and training to provide signs that have the proper contrast, raised lettering, braille, and symbols for access. They are also able to provide on-site consultation.
7. **Yes.** The first and best source is to work with the employee to find out exactly what equipment or modifications he needs. Counselors at the Idaho Division of Vocational Rehabilitation will be able to provide ideas to help you locate any necessary devices. The Assistive Technology Regional Centers found in the Resource Guide can also provide assistance for job site modifications.
8. Many of the standards can already be found in the ADAAG and UFAS guidelines. Examples include the height requirements for surfaces that a person who uses a wheelchair can transfer onto, accessible routes that provide access to a play area and around the equipment, and operating controls that might require pinching, twisting, or grasping movements. Many park equipment manufacturers are producing accessible equipment. Contact recreation departments or Able Data for ideas. Be sure to involve parents and youth with disabilities of all kinds in the selection and decision-making process.
9. **Yes.** After the facilities have been reviewed and the barriers identified, the input of citizens with disabilities can help you prioritize modifications. You will probably find that many of the modifications are "quick-fix" items that require little labor and materials.

ACCESSIBLE SIGNAGE

Match the picture with the correct letter.

- A Equipped for individuals who are deaf or hearing impaired
- B Text telephone for the disabled (TDD)
- C In case of fire use stairs
- D Telephone for the hearing impaired
- E Women's accessible restroom
- F Men and women's restroom
- G Stairs
- H Men and women's accessible restroom



1 _____



5 _____



2 _____



6 _____



3 _____



7 _____



4 _____

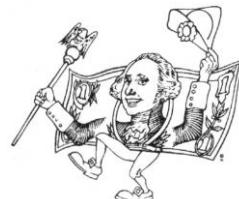


8 _____

1. F	4. D	8. E
2. G	5. A	7. H
3. C	6. B	9. I

Answers

FUNDING AVAILABLE TO REMOVE ARCHITECTURAL BARRIERS



What Agency Do You Contact?

The Idaho Community Development Block Grant program (ICDBG) is administered by the Department of Commerce's Division of Community Development, with funds received annually from the U.S. Department of Housing and Urban Development (HUD).

**Idaho Department of Commerce
Division of Community Development**
700 West State Street
P.O. Box 83720
Boise, Id 83720-0093
(208) 334-2470

Can ICDBG Funds Be Used To Eliminate Architectural Barriers?

ICDBG funds may be used to remove architectural barriers that restrict the mobility and accessibility of the elderly and persons with disabilities in public facilities, including city halls and county courthouses. This can include parking spaces, ramps, elevators, bathrooms and all or any part of a public building that allows an individual access to public goods and services.

When putting together an application, your activities should be based on the barriers identified in the 504/ADA self-evaluation and transition plan process. Specifically, your plans must include the identification of architectural barriers, modifications to correct barriers, and costs to eliminate barriers. You will also need to include construction design and the ability to match funding through cash or in-kind sources.

What is ICDBG?

ICDBG helps Idaho cities and counties with a population under 50,000 in the developing of needed public infrastructure and housing to support local economic diversification and growth.

Only incorporated cities or counties are eligible to apply for ICDBG funds. Special service providers, such as fire districts, senior citizen centers and water or sewer districts, must be sponsored by a city or county. The maximum amount that can be requested is \$500,000. A match from other sources, cash or in-kind, will make the project more competitive.

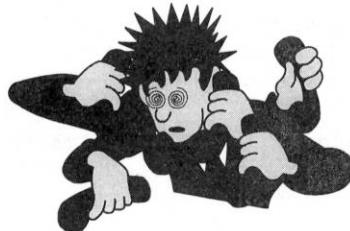
How Do I Apply for the Funds?

The application process consists of a notice of intent to apply for funding and an addendum. Applicants must pass two basic tests to make the first cut in the selection process. **First**, the application must meet one of the following national objectives:

- Must benefit low to moderate income persons.
- Aid in the elimination or prevention of slum or blighted areas .
- Address a threat that poses a serious and immediate threat to the community's health and safety.

Secondly, the project must be made up of eligible activities.

SECTION III: RESOURCE GUIDE



This list of resources is arranged by regions.

The purpose of the list is to help find equipment and consultation to comply with 504/ADA. Each entry includes a brief description of the services and/or resources available. Some organizations may provide additional resources.

At least one **general** Information and Referral (I&R) Service is listed for each region. The I&R service probably will not have information related specifically to the 504/ADA regulations. However, they may help you locate sources for finding sign language interpreters, auxiliary aids and appliances and other resources. If you are having trouble finding resources in your area, be sure to try listings in the region closest to you. They may direct you to resources in your region.

Every attempt has been made to ensure that the resource guide is as accurate and up-to-date as possible. If you find errors or locate additional resources that may be useful, please contact the Department of Commerce or Access Concepts & Training, Inc. and corrections will be made to future versions of this list. ***Inclusion in the resource guide does not imply an endorsement of one organization over another.***

How Do I Use the Resource Guide?

You work for the city of Idaho Falls. A person from out of town who has a significant hearing loss is providing a presentation at the city council meeting. You are coordinating this meeting and the individual requests an auxiliary aid.

What Do You Do?

STEP 1: Contact the individual to determine the auxiliary aid that will provide the most effective communication. In this case, you may need to meet with this individual in person as she/he is unable to hear over the telephone in the motel.

STEP 2: At your meeting the person indicates that a sign language interpreter is not required but would like an FM amplification system. She/he explains that the FM system will assist her/him to hear questions resulting in a more effective presentation.

STEP 3: Turn to the section of the resource list that includes Idaho Falls. A **general resource** for this purpose would be Access for Idaho, the Independent Living Center in Pocatello. The staff may direct you to a resource in Idaho Falls that rents an FM amplification system.

A **specific resource** is the Assistive Technology Regional Center operated by Easter Seals/Goodwill Industries in Idaho Falls. This organization may also provide resources for renting or purchasing this auxiliary aid.

Step 4: Before the council meeting, ask the equipment provider to instruct you on how to use the equipment. Practice with the FM system to make sure that you are prepared to set it up properly.

Congratulations! You located the equipment and can use it correctly. Your city provided effective communication and the person was able to fully participate in your meeting. Be sure to make notes in your resource guide so you can be ready the next time there is a similar need.

STATEWIDE RESOURCES

Access Concepts & Training, Inc.

1106 South Vermont

Boise, Idaho 83706

(208) 342-5865

Contact Person: Dana Gover, Consultant

Private consulting specializing in technical assistance and training on Section 504/ADA, research, community development, and grant writing.

Disability Action Center Northwest

124 East 3rd Street

Moscow, Idaho 83843

(208) 883-0523 Voice/TDD

Contact Person: Mark Leeper

Information on compliance with the ADA, services, and advocacy for people with disabilities.

Idaho Task Force On The ADA

1020 South Vermont

Boise, Idaho 83706

(208) 344-5590

Information, training, and technical assistance for compliance with the ADA.

Idaho Relay Service (IRS)

Information: (800) 368-6185

Voice Access: (800) 377-1363

TDD Access: (800) 377-3529

The IRS allows communication between individuals with a speech and/or hearing disability and hearing individuals via the telephone. This service is available to 24 hours a day, 365 days a year. Calls may be initiated by either TDD or voice and all calls are confidential.

Idaho Correctional Industries (ICI)

1123 Exchange Street

Boise, Idaho 83705-9987

(208) 334-5310 Boise

(800) 334-5313 Toll free, Northern Idaho to Twin Falls

(208) 236-6380 Pocatello

(800) 693-4343 Toll free, Twin Falls through Eastern Idaho

ICI can provide a complete range of interior and exterior signs for complying with the ADA. ICI can provide consultation for size, contrast, braille, and raised lettered signs.

Idaho Assistive Technology Project

Idaho Center on Developmental Disabilities

University of Idaho

Moscow, Idaho 83843

(800) IDA-TECH

The Idaho Assistive Technology Project provides assistive technology services (auxiliary aids and appliances) to people with disabilities in the workplace, home, and community.

REGIONAL RESOURCES

NORTHERN IDAHO

Panhandle ATRC

Assistive Technology Regional Center

212 North 4th Avenue Suite 137

Sandpoint, Idaho 83864

(208) 661-3095

(208) 265-0909

Contact Person: Jean Gerth

Information and assistance on technology, equipment, and devices for people with disabilities. Communication, mobility, learning, self-help, and job-related needs.

Idaho Division of Vocational Rehabilitation (IDVR)

Sandpoint Sub-Regional Office

212 North 1st Street Suite G-104

Sandpoint, Idaho 83864-1400

(208) 263-2911 Voice/TDD

Vocational and employment services for people with disabilities.

S.L. Start and Associates

2005 Ironwood Parkway Suite 119

Coeur d'Alene, Idaho 83814

(208) 765-5707

Contact Person: Mari Holbrook

Information on compliance with the ADA.

Self-Help For The Hard Of Hearing

11303 Hayden Bluff Lane

Hayden Lake, Idaho 83835

(208) 772-3033

Contact Person: John Centa

Provides information and assistance for individuals who are hard of hearing.

Area Agency on Aging

Information and Referral

North Idaho College

1000 West Garden Avenue

Coeur d'Alene, Idaho 83814

(800) 642-9099

General information primarily geared toward the elderly.

Idaho Commission for the Blind

2005 Ironwood Parkway Suite 224

Coeur d'Alene, Idaho 83814

(208) 769-1411

Contact Person: Sherry Adkins

Provides vocational and independent living services for people with significant visual impairments or blindness.

Idaho Division of Vocational Rehabilitation (IDVR) Regional Office

1010 Ironwood Drive Suite 101

Coeur d'Alene, Idaho 83814-2699

(208) 769-1441 Voice/TDD

Vocational and employment services for people with disabilities.

IDVR Lake City Sub-Regional Office

2195 Ironwood Court

Coeur d'Alene, Idaho 83814-2628

(208) 769-1406

Vocational and employment services for people with disabilities.

Disability Action Center Northwest

124 East 3rd Street

Moscow, Idaho 83843

(208) 883-0523 Voice/TDD

Contact Person: Mark Leeper

Information on compliance with the ADA, services, and advocacy for people with disabilities.

Satellite office in **Coeur d'Alene:** (208) 664-9896.

Creative Learning Systems

P.O. Box 9391

Moscow, Idaho 83843

(208) 883-3887

Contact Person: Todd Devries

Computer information and software access, and TA assistance for individuals with disabilities.

Idaho Assistive Technology Project

Assistive Technology Regional Center

129 West 3rd Street

Moscow, Idaho 83843

(208) 885-6849 Voice 1-800-432-8324 TDD

(208) 885-9056 (fax)

Contact Person: Gabrielle Enfield

Information and assistance on technology, equipment, and devices for people with disabilities.

Communication, mobility, learning, self-help, and job-related needs.

Idaho Division of Vocational Rehabilitation (IDVR)

Moscow Sub-Regional Office

609 South Washington Suite 201

Moscow, Idaho 83843-3064

(208) 882-8550 Voice/TDD

Vocational and employment services for people with disabilities.

Eastern Washington Center for the Deaf and Hard of Hearing

1206 N. Howard

Spokane Washington 99201-2410

Interpreter Service: Doris Argo (509)328-3728

If no answer call (509)328-9220 Voice (509) 328-3772 TDD

Interpreter services, information, assistance on equipment, technology, and devices for individuals who are deaf or hard of hearing.

Sign Language Interpreters

Moscow/Lewiston: Lynn Anderson (208) 885-9414

William Long (509) 758-6138

Coeur d'Alene: Gloria Jensen (208) 772-6368 (208) 664-7134 (pager)

CENTRAL IDAHO

Idaho Division of Vocational Rehabilitation (IDVR) Regional Office

1118 F Street

P.O. Box 1368

Lewiston, Idaho 83501-1986

(208) 799-5070 (Voice)

(208) 799-5072 (TDD)

Vocational and employment services for people with disabilities.

Idaho Commission for the Blind

1118 F. Street

Lewiston, Idaho 83501

(208) 746-5566

Contact Person: Gary Pickrel

Vocational and independent living services for people who have significant visual impairments or blindness.

Area Agency on Aging

Information and Referral

Community Action Agency, Inc.

1424 Main Street

Lewiston, Idaho 83501

(800) 877-3602

General and specific information about services and equipment, primarily geared toward the elderly and caregivers.

Disability Action Center Northwest

124 East 3rd Street

Moscow, Idaho 83843

(208) 883-0523

Contact Person: Mark Leeper

Information, consultation, and technical assistance on compliance with the ADA. Services and advocacy for people with disabilities.

IDVR Moscow Sub-Regional Office

609 South Washington, Suite 201

Moscow, Idaho 83843-3064

(208) 882-8550 Voice/TDD

Vocational and employment services for people with disabilities.

IDVR Orofino Sub-Regional Office

950 Michigan Avenue

P.O. Box 1178

Orofino, Idaho 83544-1178

(208) 476-5574 Voice/TDD

Vocational and employment services for people with disabilities.

Sign Language Interpreters

Moscow/Lewiston: Lynn Anderson (208) 885-9914

SOUTHWEST IDAHO

Living Independence Network Corporation (LINC)

708 West Franklin Street

P.O. Box 837

Boise, Idaho 83720

(208) 336-3335

Contact Person: Mr. Kelly Buckland

Information, consultation, and assistance in working with individuals who have disabilities.

Access Concepts & Training, Inc.

1106 South Vermont

Boise, Idaho 83706

(208) 342-5865

Contact Person: Dana Gover

Consultation, training, and technical assistance for compliance with Section 504/ADA.

Research and grant writing.

The Idaho Task Force on the ADA

1020 South Vermont

Boise, Idaho 83706

(208) 344-5590

Information, training, and technical assistance for compliance with the ADA.

Idaho Human Rights Commission

450 West State

P.O. Box 83720

Boise, Idaho 83720

(208) 334-2873

Contact Person: Linda Goodman

Provides consultation on and enforcement of state and selected federal laws that prohibit discrimination.

The Arc, Inc.

4402 Albion

Boise, Idaho 83705

(208) 343-5583

Contact Person: Pat Harting

Information, consultation, and technical assistance for compliance with the ADA. Services include employment and supported living for people with developmental disabilities.

Idaho Department of Commerce, ICDBG

700 West State Street

P.O. Box 83720

Boise, Idaho 83720-0093

(208) 334-2470

Contact Person: Gloria Mabbutt

Consultation, technical assistance, and Community Development Block Grants.

Treasure Valley Association of the Hearing Impaired

309 North Atlantic

Boise, Idaho 83706

(208) 344-0807 Voice/TDD

Contact Person: Jackie Baxter

Information on all areas related to deafness, interpreter referral, auxiliary aids, and appliances.

Idaho State Council For the Deaf and Hard of Hearing

1720 Westgate Mall Room 11

7800 Fairview (Building Location)

Boise, Idaho 83704

(208) 334-0879

Contact Person: Penny Cooper

Information on areas related to deafness and hard of hearing.

Resources for the Blind of Idaho

1301 South Capitol, Suite C

Boise, Idaho 83706

(208) 343-5066

Information on all areas related to blindness, auxiliary aids, and appliances.

United Cerebral Palsy of Idaho

Assistive Technology Regional Center

5530 Emerald

Boise, Idaho 83704

(208) 377-8070

(208) 322-7133

Contact Person: Mary Tucker

Information and assistance on technology, equipment, and devices for people with disabilities.

Communication, mobility, learning, self-help, and job-related needs.

Idaho Commission for the Blind

341 West Washington

P.O Box 83720

Boise, Idaho 83720-0012

(208) 334-3220

Contact Person: Doug Doughtit

Vocational and Independent Living services for people with significant visual impairments or blindness. Radio Reading Program, Low Vision Aids and Appliances, Adaptive Technology Program, Orientation and Adjustment Center.

Idaho Division of Vocational Rehabilitation (IDVR) State Office

650 West State Street Room 150

P.O. Box 83720

Boise, Idaho 83720-3650

(208) 334-3390 Voice/TDD

Contact Person: Bob Graham

Vocational and employment services for people with disabilities.

IDVR Boise - West Regional Office

6550 Emerald Street, Suite 112

Boise, Idaho 83704-8780

(208) 327-7411

Vocational and employment services for people with disabilities.

IDVR Boise - East Regional Office

3350 Americana Terrace, Suite 210

P.O. Box 83720

Boise, Idaho 83706-2502

(208) 344-3650 Voice 334-3670 TDD

Vocational and employment services for people with disabilities.

IDVR Boise School To Work Transition Office

6003 Cassia Street

Boise, Idaho 83709-4529

(208) 322-3738 Voice/TDD

Vocational and employment services for people with disabilities.

IDVR Boise - Westgate Sub-Regional Office

1720 Westgate

Boise, Idaho 83704-7164

(208) 334-0802 Voice/TDD

Vocational and employment services for people with disabilities.

Boise Speech and Hearing

6700 Emerald Street

Boise, Idaho 83704

(208) 376-3597

Contact Person: Neal Schanbeck

Auxiliary aids and appliances for people who are deaf or hard of hearing.

Senior Programs of Boise City - Ada County

Information and Referral

1975 Broadway Avenue, Suite B

Boise, Idaho 83706

(208) 345-7777

(800) 273-0180 (Canyon County)

IDVR Caldwell Regional Office

517 South 10th Suite B

Caldwell, Idaho 83605-4158

(208) 454-7606 Voice/TDD or 888-0963

Vocational and employment services for people with disabilities.

IDVR Payette Sub-Regional Office

2 North Main

Payette, Idaho 83661-2520

(208) 642-4762 or 642-9031 Voice/TDD

Vocational and employment services for people with disabilities.

IDVR Nampa Sub-Regional Office

912 12th Avenue South Suite C

Nampa, Idaho 83651-4659

(208) 465-8414 Voice/TDD

Vocational and employment services for people with disabilities.

IDVR Mercado Sub-Regional Office

317 Happy Day Boulevard

P.O. Box 1219

Caldwell, Idaho 83605-1219

(208) 459-0092

Vocational and employment services for people with disabilities.

Sign Language Interpreters

Treasure Valley Area: Jackie Baxter (208) 344-0807 Voice/TDD

SOUTH CENTRAL IDAHO

Idaho Division of Vocational Rehabilitation (IDVR)

Mountain Home Sub-Regional Office

470 North 3rd Street East Suite 2

Mountain Home, Idaho 83647-2653

(208) 587-3651 Voice/TDD

Contact Person: Lupe Wissel

Vocational and employment services for people with disabilities.

Idaho School for the Deaf and Blind

1450 Main Street

Gooding, Idaho 83330

(208) 934-4457 Voice/TDD

**Area Agency on Aging
Information and Referral**
College of Southern Idaho
P.O. Box 1238

Twin Falls, Idaho 83301
(800) 649-9798

General and specific information about services and equipment primarily geared toward the elderly and caregivers.

Idaho Division of Vocational Rehabilitation (IDVR) Twin Falls Regional Office

245 3rd Avenue North
Twin Falls, Idaho 83301-6131
(208) 736-2156 Voice/TDD

Vocational and employment services for people with disabilities.

Living Independence Network Corporation (LINC)

1002 Shoshone Street East

Twin Falls, Idaho 83301

(208) 733-1712

Contact Person: Dennis McDermit

Services and advocacy for people with disabilities.

Regional Technical Assistance Center

Information and assistance on technology, equipment, and devices for people with disabilities.
Communication, mobility, learning, self-help, and job-related needs.

Local Consortium of Southern Idaho School To Work Transition Program

Idaho School for the Deaf and Blind

Infirmary Building

1450 Main Street

Gooding, Idaho 83330-1839

(208)934-8865 Voice/TDD

Magic Valley Rehabilitation Services (MVRS)

484 Eastland Drive South

Twin Falls, Idaho 83301

(209) 734-4112

Contact Person: Jeff Crumbrine

Test and Evaluation, job placement for individuals with disabilities. Technical assistance on the Americans with Disabilities Act.

Idaho Commission for the Blind

1201 Falls Avenue, Suite 38

Twin Falls, Idaho 83301

(208) 736-2140

Contact Person: Richard Bar

Vocational and independent living services for people with significant visual impairments or blindness.

IDVR Burley Sub-Regional Office

1458 Overland Avenue, Suite 5

CSI Building

Burley, Idaho 83318-1806

(208) 678-3838 Voice/TDD

Vocational and employment services for people with disabilities.

Sign Language Interpreters:

Twin Falls: Valerie Sturm (208) 733-4657

Heather Fultz (208) 733-8421

Gooding: Brenna Andrew (208) 934-8564

SOUTHEAST IDAHO**Access for Idaho**

209 East Lewis Street, Suite B

Pocatello, Idaho 83201

(208) 232-2747 Voice/ TDD 1-800-232-2747

Contact Person: Cathy Graham

Information, consultation, and technical assistance for compliance with the ADA. Services and advocacy for people with disabilities. Access to telecommunication equipment and loan library.

Easter Seals Society/Goodwill Industries**Assistive Technology Regional Center**

800 Yellowstone #14

Pocatello, Idaho 83201

(208) 233-6824

Contact Person: John Lyksett

Information and assistance on technology, equipment, and devices for people with disabilities.

Communication, mobility, learning, self-help, and job-related needs.

Idaho Commission for the Blind

427 N. Main Suite K

Pocatello, Idaho 83204

(208) 233-7171

Contact Person: Norma Turnbeaugh

Vocational and independent living services for people with significant visual impairments and blindness.

Idaho Division of Vocational Rehabilitation (IDVR) Pocatello Regional Office

1070 Hiline, Suite 260

Pocatello, Idaho 83201-2947

(208) 236-6333 Voice/TDD

Vocational and employment services for people with disabilities.

**Area Agency on Aging
Information and Referral**

280 S. Arthur
Pocatello, Idaho 83204
(208) 233-4032
(800) 526-8129

Envisioners

4447 Burley Road
Chubbuck, Idaho 83202
(208) 237-6052

Grant writing, program development, community organization, and training on issues relating to individuals with disabilities.

Idaho Division of Vocational Rehabilitation (IDVR) Blackfoot Sub-Regional Office

745 W. Bridge Street Suite 1
Blackfoot, Idaho 83221-2020
(208) 785-6649 Voice/TDD

Vocational and employment services for people with disabilities.

Easter Seals Society/Goodwill Industries

Information and Referral

2110 Rollandet Avenue
Idaho Falls, Idaho 83402
(208) 529-5979

Information and referral on services, programs, and equipment for people with disabilities.

Area Agency on Aging

Information and Referral

Eastern Idaho Special Services Agency
P.O. Box 51098
Idaho Falls, Idaho 83405
(208) 522-5391
(800) 632-4183

Information and referral on services, programs, and equipment primarily geared toward the elderly and caregivers.

Easter Seals Society/Goodwill Industries

2110 Rollandet
Idaho Falls, Idaho 83402
(208) 529-5979
(208) 529-5984 (fax)

Contact Person: Tami Sawyer

Information and assistance on technology, equipment, and devices for people with disabilities.
Communication, mobility, learning, self-help, and job-related needs.

Idaho Commission For The Blind

1825 Hoopes Ave.

Idaho Falls, Idaho 83404

(208) 525-7028

Vocational and independent living services for people with significant visual impairments and blindness.

IDVR Idaho Falls Regional Office

1825 Hoopes Avenue

Idaho Falls, Idaho 83404-8018

(208) 525-7149 Voice/TDD

Vocational and employment services for people with disabilities.

IDVR Idaho Falls Goals Office

Eastern Idaho Technical College

1600 South 2500 East

Idaho Falls, Idaho 83404-5745

(208) 524-3000 Voice/TDD

Vocational and employment services for people with disabilities.

IDVR Preston Sub-Regional Office

43 North 1st East

Preston, Idaho 83263-1325

(208) 852-0092 Voice/TDD

Vocational and employment services for people with disabilities.

IDVR Salmon Sub-Regional Office

1301 Main Street

P.O. Box 1499

Salmon, Idaho 83467

(208) 756-2114

Vocational and employment services for people with disabilities.

IDVR Rexburg Sub-Regional Office

145 West Main Street #3

Rexburg, Idaho 83440-1859

(208) 356-4190 Voice/TDD

Vocational and employment services for people with disabilities.

Sign Language Interpreters

Pocatello: Joelynne Warr (208) 236-6042

Dianne Jenkins (208) 237-5346

Idaho Falls: Shari Feldman (208) 524-2735

Linda Johnson no telephone number available

ECONOMIC PLANNING DISTRICTS

There are six planning districts in Idaho. Their purpose is to 1) improve the economic stability of each region; 2) promote and assist the growth and development of business concerns in each region; 3) cooperate with all levels of government and interested private individuals and legal entities in the furthering of economic stability and growth; 4) to use any federal and state funds available and/or private funds which may be made available to help carry out the purpose of the planning district.

The staff with these organizations have participated in Section 504/ADA training. They have assisted Access Concepts & Training, Inc. organize and provide on-site technical assistance on Section 504/ADA. The planning districts addresses and phone numbers are as follows:

East Central Idaho Planning
and Development Association
Box 330
Rexburg, Idaho 83440
(208)356-4524
Fax 356-4544

Region IV Development Association
Box 1844
Twin Falls, Idaho 83303
(208)736-3064
Fax 736-3067

Clearwater Economic Development
Association
1626 B 6th Ave. North
Lewiston, Idaho 83501
(208)746-0015
Fax 743-4243

Southeast Idaho Council of Governments
280 S. Arthur
Pocatello, Idaho 83204
(208)233-4032
Fax 233-4841

Ida-Ore Regional Planning and
Development Association
10624 West Executive Drive
Boise, Idaho 83704
(208)322-7033
Fax 322-3569

Panhandle Area Council
11100 Airport Dr.
Hayden, Idaho 83835
(208)772-0584
Fax 772-6196

TECHNICAL ASSISTANCE RESOURCES OUT OF IDAHO

Able Data

National Rehabilitation Information Center

8455 Colesville Road Suite 935

Silver Spring, MD 20910

(800)346-2742 Voice/TDD

A database with over 17,000 listings of adaptive equipment for individuals with disabilities.

Assists in locating technology solutions for specific disabilities.

Northwest Disability Business

Technical Assistance Center

P.O. Box 9046

Olympia, Wa. 98507

(800)949-4232

This center is authorized to provide information, materials, and technical assistance to individuals and entities that are covered by the ADA.

Job Accommodation Network (JAN)

West Virginia University

809 Allen Hall

Morgantown, WV 26506

(800)ADA-WORK Voice/TDD

(800)526-7234 Voice/TDD

(304)293-7186 Voice/TDD

JAN is a service of the President's Committee on Employment of People with Disabilities. This organization provides international information and a consulting resource for employers and job applicants. Staff will provide help to solve job accommodation problems through the toll-free hot-line.

Disability Rights and Education Defense Fund (DREDF)

2212 Sixth Street

Berkeley, CA 94710

(510)644-2555 Voice

(510)644-2629 TDD

Disability Rights and Education Defense Fund (DREDF)

1633 Q Street NW Suite 220

Washington, DC 20009

(202)986-0375 Voice/TDD

A legal organization that played a lead role in the passage of the ADA. Services include the provision of training, technical assistance, and an informed analysis of requirements under disability law.

FEDERAL AGENCIES

Architectural and Transportation Barriers Compliance Board

1331 F Street NW Suite 1000

Washington, DC 20004-1111

(800)USA-ABLE voice

(202)272-5434 Voice

(202)272-5449 TDD

Enforces the ADA Accessibility Guidelines and architectural accessibility for the government.

Department of Housing and Urban Development (HUD)

Community Planning and Development

451 7th Street

Washington, D.C. 20410-4000

(202)708-0270 Voice

Provides Community Development Block Grant funds.

Equal Employment Opportunity Commission (EEOC)

1801 L. Street NW

Washington, DC 20507

(800)669-EEOC Voice

(800)800-3302 TDD

Enforces the ADA and civil rights employment regulations.

Department of Justice

Civil Rights Division

Public Access Section

P.O. Box 66738

Washington, DC 20035-9998

(202)514-0301 Voice

(202)514-0383 TDD

Enforces Title II state and local government and Title III public accommodations regulations.

U.S. Government Printing Office

Superintendent of Documents

Mail Stop: SSOP

Washington, DC 20402-9328

(202)783-3238 Voice

(202) 512-1426 TDD

A Federal agency that prints federal documents. Check with this department to see if there have been updates or new technical assistance manuals printed on the ADA.

ADA JOURNALS AND UPDATING SERVICES

There are a number of journals and services which update ADA issues, including lawsuits which have been filed. Some of them cover other disability rights laws as well. They can be costly but are great sources of information.

1. **ADA Policy and Law**, Buraff Publications, 1350 Connecticut Avenue NW, Suite 1000, Washington D.C. 20036-1702, (800)333-1291 or (617)423-2020 (in Massachusetts). Monthly, about 20 pp., \$385/year. Very good -- the most detailed and technical of the periodicals.
2. **Disability Law Compliance Report**, published by Warren Gorham Lamont, 31 Street James Avenue Boston, MA 02116, (800)950-1205. Monthly, 8 pp., \$125/year. Gives a lot of good analytical information about cases.
3. **Americans with Disabilities Act Manual Newsletter**, published by the Bureau of National Affairs (BNA), 1231 - 25th Street NW, Washington D.C., 20037-1197, (800)372-1033. Monthly, 6 pp., \$101/year for newsletter only, \$375/year for Manual which includes newsletter, laws, regulations, etc. Also very good.
4. **Report on Disability Programs**, Business Publishers (formerly Handicapped Americans Report), 951 Pershing Drive, Silver Spring, MD 20920-4464, (800)274-0122 (outside D.C. area) or (301)589-5103 (inside D.C. area) Biweekly, 8 pp., \$273/year.
5. **Disability Compliance Report**, Legal Research Publications, P.O. Box 980, Horsham, PA 19044-0980, (800)341-7874 Ext. 347. Biweekly, 16 pp., \$165/year.
6. **ADA Title II Action Guide For State and Local Governments**, Adaptive Environments Center, Inc., National Institute on Disability and Rehabilitation Research. LRP Publications, Horsham, Pennsylvania 19044. This manual is very good to assist state and local government understand and comply with Title II of the ADA. \$10.00

APPENDIX

Monitoring Guide for the Idaho Community Development Block Grant Program

***MONITORING GUIDE
FOR
SECTION 504 NONDISCRIMINATION
ON THE BASIS OF DISABILITY***

GRANTEE: _____

CONTRACT NO.: _____

DATE: _____

REVIEWED BY: _____

NAMES AND TITLES OF STAFF INTERVIEWED:

**A. DESIGNATION OF RESPONSIBLE
EMPLOYEE SECTION 504/ADA COORDINATOR**

	YES	NO	N/A
1. Has a responsible employee been designated to oversee Section 504/ADA activities?	—	—	—
2. Does this person have a good understanding of his/her responsibilities?	—	—	—

B. POLICY ON NONDISCRIMINATION

1. Has the policy on nondiscrimination for individuals with disabilities been adopted?	—	—	—
2. Has the policy been published?	—	—	—
3. Has the grantee identified a number of methods to notify the public of its responsibilities under Section 504/ADA on an on-going basis?	—	—	—

	YES	NO	N/A
4. Does the public notice include the Section 504/ADA Coordinator's name, address, and reasonable time frames to request accommodations?	—	—	—

C. GRIEVANCE PROCEDURE:

1. Has the grievance procedure been adopted? — — —
2. Does the public notice include a statement about the availability of the grievance? — — —
3. Does the procedure contain due process standards? — — —
4. Has the grantee identified methods to notify the public of the availability of the grievance procedure on an on-going basis? — — —

D. CITIZEN REVIEW

1. Has the grantee formed a citizen review committee? — — —
2. Does the committee membership represent persons from different disability groups? — — —
3. Does the committee meet on a regular basis? — — —
4. Does the committee have a good understanding of their roles and responsibilities? — — —
5. Are complete records maintained regarding all committee actions? — — —

E. SELF-EVALUATION PROCESS	YES	NO	N/A
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1. Has the grantee conducted a detailed review of all programs, activities and services? — — —
2. Does the grantee provide documentation that a thorough review has been conducted? — — —
3. Does the grantee have written methods of providing effective communication? — — —
4. Does the grantee provide alternative formats for written materials? — — —
5. Does the grantee provide auxiliary aids and services for the purpose of effective communication? — — —
6. Does the grantee provide effective communication over the phone? — — —
7. Does the grantee conduct a detailed evaluation of its employment policies, practices and procedures? — — —
8. Does the grantee include action steps to modify discriminatory practices identified in the self-evaluation? — — —

F. TRANSITION PLAN

1. Has the grantee conducted a review of all its facilities? — — —
2. Has a checklist been completed on each facility? — — —
3. Does the transition plan identify architectural barriers? — — —

		YES	NO	N/A
4.	Have modifications been included in the plan to correct barriers?	—	—	—
5.	Have completion dates to address barriers been included?	—	—	—
6.	Will the structural changes be completed by January 26, 1995?	—	—	—

G. UNDUE BURDEN:

1. Does the grantee include written documentation supporting its reason to claim the undue burden standard? — — —
2. Does the grantee demonstrate that all resources available for the funding and operation of the service, program or activity were taken into consideration? — — —
3. Was the decision made by the head of the entity or her or his designee? — — —
4. Does the grantee find other modifications that are feasible to ensure that it does not discriminate against individuals with disabilities in any program, service or activity? — — —

BIBLIOGRAPHY

Americans with Disabilities Act Accessibility Guidelines (ADAAG). U.S. Architectural and Transportation Barriers Compliance Board; Washington, D.C., 1991.

ADA Title II Action Guide for State and Local Government. Adaptive Environments Center. LRP Publications, Horsham, Pennsylvania 19044.

Explanation of the Contents of the Americans with Disabilities Act of 1990. Disability Rights Education and Defense Fund (DREDF). Training Handbook for Phase 1 and 2 participants in the National Network Training Project on the ADA.

Federal Register 24 CFR Part 8, Department of Housing and Urban Development: Nondiscrimination Based on Disability in Federally Assisted Programs and Activities; Final Rule, June 2, 1988. (Section 504 Regulations).

Federal Register CFR 1630, Equal Employment Opportunity Commission: Prohibits discrimination against qualified individuals on the basis of disability in all aspects of employment; Final Rule, July 26, 1991. (Title I Regulations).

Federal Register 28 CFR 35, Department of Justice: Nondiscrimination on the Basis of Disability in State and Local Government Services; Final Rule, July 26, 1991. (Title II Regulations).

Title I Technical Assistance Manual. Equal Employment Opportunity Commission; Washington, D.C., 1992.

Title II Technical Assistance Manual. Department of Justice; Washington, D.C., 1991.

Uniform Federal Accessibility Standards (UFAS). Architectural and Transportation Barriers Compliance Board; Washington, D.C., 1988.

I want to thank all of the Idaho Community Development Block Grant (ICDBG) recipients and grant administrators for your participation in the Department of Commerce's technical assistance project . Without your participation, this project would not have been possible.

I would also like to thank Disability Rights Education and Defense Fund (DREDF) and Independent Living Research Utilization (ILRU) for choosing me to participate in their national training and network project called "The Americans with Disabilities Act Training and Implementation Network." The ADA network project was jointly funded and approved by the Equal Employment Opportunity Commission (EEOC) and the Department of Justice (DOJ). As a participant in both Phase I and Phase II of this national network project, I learned invaluable lessons from the outstanding DREDF and ILRU trainers.

As a result, I am committed to serving as a trainer and a resource person on the ADA. Without this training, I would not have had the opportunity to share my experiences as a person with a disability or to share the positive impact of Section 504 and the ADA on my life.

The IDC project has been very exciting. I have learned a great deal about Idaho communities and have met many wonderful people. Because of the Idaho Department of Commerce's dedication and support in developing a model program on Section 504/ADA, our communities will be accessible for all people. Please keep in touch; I am only a telephone call away.

Dana Gover
May 23, 1994
1106 S. Vermont
Boise, ID 83706
(208) 342-5865



**ALBERTSONS LIBRARY
BOISE STATE UNIVERSITY**