Title II ADA Training

Supplemental Handout Materials

January 18, 2022

Resources: DOJ Title II Toolkit: https://archive.ada.gov/pcatoolkit/toolkitmain.htm

Title II Action Guide: https://www.adaactionguide.org/

Chapter 2 Addendum:
Title II Checklist
(ADA Coordinator, Notice & Grievance Procedure)

PURPOSE OF THIS CHECKLIST: This checklist is designed for use as an assessment of **(1) the requirements and tasks of an ADA Coordinator, (2) the government entity's provision of the ADA notice, and (3) the government entity's ADA grievance procedures.**

MATERIALS AND INFORMATION NEEDED: To assess compliance with these administrative requirements, you will need:

✓ a copy of the written position description for an ADA Coordinator, if applicable;

✓ information about the procedures followed by the ADA Coordinator to ensure compliance with the ADA, how complaints are processed, and other tasks performed by the ADA Coordinator;

✓ a copy of the written notice or notices used by the state or local government; and

✓ a copy of the written grievance procedures used by the state or local government.

ADA Coordinator

1. Does the state or local government have an ADA Coordinator? All state and local governments with 50 or more employees are required to designate at least one responsible employee to coordinate ADA compliance.

❏ Yes, the state or local government has an ADA Coordinator.

❏ No, the state or local government does not have an ADA Coordinator but an ADA Coordinator is not required because the public entity has fewer than 50 employees, including all part-time and full-time employees.

❏ No, the state or local government does not have an ADA Coordinator even though it has 50 or more employees.

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│                    ACTIONS:                     │
│                                                 │
│ If the local government has fewer than 50 employees, it is not │
│ required to have an ADA coordinator.  HOWEVER, it is strongly │
│ recommended that an ADA coordinator be appointed.│
│                                                 │
│ If the state or local government has 50 or more employees, it │
│ must have a designated ADA Coordinator.  Any state or local │
│ government that does not have an ADA coordinator is in violation │
│ of federal law.  An ADA Coordinator must be designated. │
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2. Does the ADA Coordinator have the time and expertise necessary to coordinate the government's efforts to comply with and carry out its responsibilities under the ADA?

❏   Yes
❏   No

3. Does the ADA coordinator actually carry out these duties?

❏   Yes
❏   No

4. Does the ADA Coordinator investigate all complaints communicated to the government alleging that the government does not comply with the ADA?

❏   Yes
❏   No

5. Does the government make available to all interested people the name, office address, and telephone number of the ADA Coordinator?

❏   Yes
❏   No

ACTIONS:

If you checked "no" for any of the questions above, here are some steps you can take to improve the coordination of your ADA compliance:

✓ Ensure that the ADA Coordinator has the time and expertise necessary to coordinate the government's efforts to comply with and carry out its responsibilities under the ADA.

✓ Ensure that the ADA Coordinator actually carries out these duties.

✓ Ensure that the ADA Coordinator investigates all complaints communicated to the government alleging that the government does not comply with the ADA.

✓ Make available to all interested people the name, office address, and telephone number of the ADA Coordinator.

Notice

1. Does the state or local government make information available to the general public regarding the fact that the ADA applies to the services, programs, and activities of the government?

❏ Yes
❏ No

2. Does the state or local government use the Department of Justice's model "Notice Under the Americans with Disabilities Act" or a similarly comprehensive notice?

❏ Yes
❏ No

3. Does the state or local government post this information in public areas or make it available in other ways as deemed necessary by the head of the government entity to inform people of the protections of the ADA?

❏   Yes
❏   No

4. Is the ADA notice available in alternate formats – *i.e.*, large print, Braille, audio format, accessible electronic format (*e.g.*, via email, in HTML format on its website)?

❏   Yes
❏   No

ACTIONS:

If you checked "no" for any of the questions above, your office may be violating the requirement for providing notice.

✓   Make information available to all interested members of the general public regarding the prohibition of discrimination against people with disabilities.

✓   Consider using the Department of Justice's model "Notice Under the Americans with Disabilities Act," or use a similarly comprehensive notice.

✓   Make this information available by posting it in common areas of public buildings, posting it on the government's website, or otherwise disseminating it as necessary to inform the public of the ADA's protections.

✓   Make the ADA notice available in alternate formats.

Grievance Procedures

1. Does the state or local government have a grievance procedure? All state and local governments with 50 or more employees are required to adopt and publish grievance procedures providing for prompt and fair resolution of complaints of discrimination on the basis of disability.

☐ Yes, the state or local government has a grievance procedure.

☐ No, the state or local government has fewer than 50 employees, including all part-time and full-time employees, and is not required to have a grievance procedure.

☐ No, the state or local government does not have a grievance procedure even though it has 50 or more employees.

2. Does the local government use the Department of Justice's model "Grievance Procedure under the Americans with Disabilities Act" or a similarly comprehensive grievance procedure (*i.e.*, a grievance procedure for complaints made by any member of the public under the ADA related to any program, service, or activity)?

❏ Yes
❏ No
❏ Not applicable, no grievance procedure is required because the public entity has fewer than 50 employees.

3. Is the grievance procedure available in alternate formats?

❏ Yes
❏ N

Departments and Programs

Public Entity Click here to enter text.   Date Click here to enter text.

Contact Person Click here to enter text.   Email Click here to enter text.   Phone Click here to enter text.

To begin the self-evaluation, list all the public entity's departments and programs. Evaluate each of these.

Departments and Programs	Staff Liaison	Evaluation Date	Comments
Recreation Program	Click here to enter text.	Click here to enter text.	Click here to enter text.
Probation Department	Click here to enter text.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.
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Departments and Programs	Staff Liaison	Evaluation Date	Comments
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Departments and Programs	Staff Liaison	Evaluation Date	Comments
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Program Accessibility

Public Entity Click here to enter text.　　　Date Click here to enter text.

Contact Person Click here to enter text.　　Email Click here to enter text.　Phone Click here to enter text.

Public entities must ensure that people with disabilities are not excluded from programs, activities, and services because of inaccessible facilities. Each facility is not necessarily required to be accessible. A public entity's services, programs, or activities, when "viewed in their entirety," must be accessible. This standard is known as "program accessibility" and is a key requirement under Title II. Structural changes are not required where there are other feasible solutions such as moving a class to an accessible location when a student with a disability needs to be in an accessible location or having a librarian retrieve books from an upper story. However, structural changes lead to increased integration and shoud be considered where feasible.

Programs, Activities and Services	Nonstructural Solutions	Structural Solutions
List programs, activities and services that are in <u>inaccessible facilities</u>. For each indicate nonstructural and structural solutions. Structural solutions should then be included in the transition plan. Nonstructural solutions can be included in the action plan.		
1. Click here to enter text.	Click here to enter text.	Click here to enter text.
2. Click here to enter text.	Click here to enter text.	Click here to enter text.
3. Click here to enter text.	Click here to enter text.	Click here to enter text.

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Programs, Activities and Services	Nonstructural Solutions	Structural Solutions
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5. Click here to enter text.	Click here to enter text.	Click here to enter text.
6. Click here to enter text.	Click here to enter text.	Click here to enter text.
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14. Click here to enter text.	Click here to enter text.	Click here to enter text.

Programs, Activities and Services	Nonstructural Solutions	Structural Solutions
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General Nondiscrimination

Public Entity Click here to enter text.   Date Click here to enter text.

Contact Person Click here to enter text.   Email Click here to enter text.   Phone Click here to enter text.

Title II of the ADA requires that people with disabilities are assured an equal opportunity to participate in the services, programs and activities offered by public entities. This part of the Title II regulations covers a wide range of issues as you will see from the questions below.

Questions		Comments	Next Steps
1. Do policies, practices and procedures provide an equal opportunity for people with disabilities to participate in services, programs and activities; that is, do policies not discriminate against people on the basis of disability? Examples: A school district requires that students with autism have a parent accompany them on school trips. This is a discriminatory practice. A city has a policy that applicants for a hunting license have a valid, state-issued driver's license. This is a discriminatory policy.	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
2. Are there circumstances in which the participation of a person with a disability would be excluded or restricted?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
3. If yes, are the exclusions or restrictions necessary to the operation of the program or to the safety of other participants? Please explain:	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.

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Questions		Comments	Next Steps
4. Are there separate services, programs or activities for people with disabilities or a class of people with disabilities? Examples: A municipal recreation department has a wheelchair basketball program. A county museum has a tour for people who are blind with an opportunity to touch sculptures. These are not discriminatory. If yes, please describe:	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
Contracting with External Organizations			
5. Do all employees who contract with outside agencies, organizations or businesses know that the public entity's ADA obligations apply whether the public entity provides the service, program or activity directly or contracts for it? Example: If a state department of emergency services funds a private organization to provide emergency shelters, the department maintains its ADA obligations to make sure people with disabilities receive the same services as people without disabilities.	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
6. Does the public entity notify each contractor of its responsibilities for providing contracted services in a nondiscriminatory manner? If yes, please describe:	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
7. Does the public entity require assurances from contractors of their fulfillment of Title II requirements?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.

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Questions		Comments	Next Steps
8. Are there procedures to ensure that contractors provide the services, programs and activities in a nondiscriminatory manner consistent with the Title II requirements? If yes, please describe:	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
Reasonable Modifications			
9. Are employees and officials aware that the public entity is obligated to make a reasonable modification in policies, practices, or procedures if the modification is necessary for a person with a disability to participate? Example: No food or beverages are allowed to be consumed at a regional transit authority's subway stations or in subway cars. In order to control blood sugar levels, a person with diabetes might need to drink juice. This would probably be a reasonable modification of a policy.	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
Service Animals (Under Titles II and III only dogs can be service animals. Miniature horses can be service animals in some circumstances.)			
10. Are employees and officials aware that:		Click here to enter text.	Click here to enter text.
a. The public entity must allow service animals to accompany people with disabilities in all areas where people without service animals are allowed to go?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
b. Only two questions may be asked: (1) Is the dog a service animal required because of a disability? and (2) What work or task has the dog been trained to perform?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.

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Questions		Comments	Next Steps
c. The public entity may not ask about a person's disability, require medical documentation, require a special identification card or training documentation for the dog, or ask that the dog demonstrate its ability to perform the work or task?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
d. A person with a disability cannot be asked to remove his service animal from the premises unless: (1) the dog is out of control and the handler does not take effective action to control it or (2) the dog is not housebroken and, in these circumstances employees must offer the person with the disability the opportunity to obtain goods or services without the animal's presence?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
e. The public entity must permit a miniature horse to accompany a person with a disability where reasonable? *Assessment factors include, the size and weight, whether the horse is housebroken, and whether its presence compromises safety requirements.*	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
Wheelchairs and Other Power-Driven Mobility Devices			
11. Are employees and officials aware that: a. People with mobility disabilities may use wheelchairs, scooters and manually-powered mobility aids, such as walkers, crutches, canes, braces, or other similar devices designed for use by individuals with mobility disabilities in any areas open to pedestrian use?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.

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Questions		Comments	Next Steps
b. People with mobility disabilities may use other power-driven mobility device in any areas open to pedestrian use unless the public entity can demonstrate that the class of other power-driven mobility devices cannot be operated in accordance with legitimate safety requirements? Other power-driven mobility device means any mobility device powered by batteries, fuel, or other engines—whether or not designed primarily for use by individuals with mobility disabilities—that is used by individuals with mobility disabilities for the purpose of locomotion, including golf cars, electronic personal assistance mobility devices, such as the Segway® PT, or any mobility device designed to operate in areas without defined pedestrian routes, but that is not a wheelchair within the meaning of Title II. *Some of the factors that go into determining "legitimate safety requirements" include: size and speed of the device, the facility's design and characteristics (outdoor, indoor), and risk of harm to the immediate environment.*	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
c. They may not ask about the nature and extent of the individual's disability, but may ask an individual to provide a credible assurance that the mobility device is required because of the person's disability? *Credible assurance includes a state-issued, disability parking placard or card, or other state-issued proof of disability or a verbal representation, not contradicted by observable fact, that the other power-driven mobility device is being used for a mobility disability.*	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
Surcharges and Costs			

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Questions		Comments	Next Steps
12. Are employees and officials aware that the public entity may not place a surcharge on people with disabilities to cover the costs of measures, such as the provision of auxiliary aids or program accessibility, that are required to provide nondiscriminatory treatment? Examples: Charging a person who is hard of hearing for the cost of providing an assistive listening system for a state hearing. A housing authority requires an additional damage deposit if tenants have service animals. These are discriminatory policies.	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
Ticketing (Not parking tickets, tickets for events that have seating.)			
13. Are tickets for accessible seats sold during the same hours; through the same methods of purchase (by telephone, on site, through a website, or through third-party vendors); and during the same stages of sales (pre-sales, promotions, general sales, wait lists, or lotteries) as non-accessible seats?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
14. If accessible seating is not available in areas of the venue with lower prices, is lower priced accessible seating available in higher priced locations?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
15. Do venues and third-party sellers provide the same information about accessible seats as provided about non-accessible seats? Example: Maps or displays of seating configurations must include information on accessible seating.	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
16. Can ticket sellers describe accessible seating in enough detail to permit the purchaser to determine if a seat meets his or her needs?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
17. Do ticket sellers know that people purchasing a ticket for a wheelchair space may purchase up to three additional seats for their companions as	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.

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Questions		Comments	Next Steps
close as possible to the wheelchair space and that these companion seats may include wheelchair spaces?			
18. Do ticket sellers know that unsold accessible seats may be released and sold to members of the general public in only one of three circumstances: • when all non-accessible seats have been sold (excluding luxury boxes, club boxes, suites, and seats the venue holds back when declaring a sell-out); or • when all non-accessible seats in a particular seating section have been sold; or • when all non-accessible seats in a particular price category have been sold?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
19. If the venue permits patrons to give or sell their tickets to others, does the venue know that the same right must be extended to patrons with disabilities and that those tickets may be sold to someone who does not have a disability? *A venue may choose to move a patron to another seat in order to give that accessible seat to a patron with a disability who requires it, but is not obligated to do so.*	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
20. Do ticket sellers know that for single event tickets, venues may ask purchasers to state that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
21. Do ticket sellers know that for series of events tickets, purchasers may be asked to attest in writing that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
Other			

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Questions		Comments	Next Steps
22. Is information about the public entity's accessible services, activities and facilities available to the public and to current and future program *participants?* *Example*: A state department of recreation includes information about accessible swimming pools, fishing piers, boat launches, picnic and camping areas on its website and in a brochure.	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.

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Effective Communication

Public Entity — Click here to enter text.   Date — Click here to enter text.

Contact Person — Click here to enter text.   Email — Click here to enter text.   Phone — Click here to enter text.

Many people who are blind or have low vision, who are deaf or hard of hearing or who have other communication disabilities are prevented from participating fully in programs, activities and services because of communication issues. To address this Title II requires that communication with people with disabilities be "as effective" as communication with others. Often good communication practices will suffice, such as not turning away when speaking with a person who is hard of hearing or taking the time to listen to a person who has a speech impairment. Other times a public entity needs to provide "auxiliary aids and services" to ensure that communication is effective.

Questions		Comments	Next Steps
Auxiliary Aids and Services *Use the Comments column to indicate how aides and services are provided.* *For example: Arranged through State Commission for the Deaf, rented from XYZ Company, available from the County Disability Office.* 1. Does the public entity know how to provide the following for people who are deaf or hard of hearing:			
a. Sign language, oral, and cued speech interpreters	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
b. Video remote interpreting (VRI) services	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.

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Questions		Comments	Next Steps
c. Computer-assisted real-time transcription (CART) services	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
d. Assistive listening devices	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
e. Open and closed captioning of videos	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
f. Real time captioning of television programs	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
g. Other:	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
2. Does the public entity know how to provide documents in the following formats for people who are blind or visually impaired and others with print disabilities:			
a. Braille	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
b. Large print	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
c. Audio recordings	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
d. Accessible electronic formats that that can be accessed by screen reading software, for example, documents in plain text or HTML	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
e. Screen reader software installed on a computer that is used by the public, for example in a library	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.

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Questions		Comments	Next Steps
f. Magnification software installed on a computer that is used by the public, for example in a computer lab	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
g. Optical readers	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
h. Other	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
Policies and Procedures			
3. Does the public entity have a policy or procedure to handle requests for auxiliary aids and services?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
4. Are employees and officials aware of the public entity's obligation to provide auxiliary aids and services?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
5. Do employees and officials know how to arrange for auxiliary aids and services? Arrangements could be made directly or through the ADA coordinator or another staff person.	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
6. Does the public entity give primary consideration to the person with a disability when determining what type of auxiliary aid or service to provide?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
7. Are employees and officials aware that it is inappropriate to request that family members and friends of people who are deaf serve as sign language interpreters, except in emergencies or if the individual wants the family member or friend to interpret and it's appropriate to do so?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.

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ADA Self-Evaluation – Effective Communication
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Questions		Comments	Next Steps
8. Are employees and officials aware that a companion of a program participant has a right to auxiliary aids and services if the companion has a communication disability and is an appropriate person with whom the public entity should or would communicate? Example: A deaf family member of a hospital patient might need a sign language interpreter to communicate with the doctor.	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
9. Are captions and audio description provided on videos and television programs the public entity produces and videos on its website?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
10. Does the public entity have a policy or procedure for determining if an auxiliary aid or service would be an undue financial and administrative burden? *The decision of undue hardship must be made by the head of the public entity or his or her designee. There must be a written statement explaining the reasons for reaching that decision.*	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
Telecommunications			
11. Do employees and officials know how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
12. Where telephones are available to the public for making outgoing calls, such as in hospital waiting rooms, are TTYs available for people with hearing and speech disabilities? *A TTY is an electronic device for text communication over a telephone line that is designed for use by people with hearing or speech disabilities.*	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.

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ADA Self-Evaluation – Effective Communication
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Questions		Comments	Next Steps
13. Do telephone emergency services, including 911, provide direct access to people who use TTYs and computer modems?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
Other Click here to enter text.			

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ADA Self-Evaluation – Effective Communication
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Website Accessibility

Public Entity _Click here to enter text._   Date _Click here to enter text._

Contact Person _Click here to enter text._   Email _Click here to enter text._   Phone _Click here to enter text._

Many people with disabilities use assistive technology such as screen readers, text enlargement software, and programs that enable people to control the computer with their voice, eyes or nose. Access problems occur when website designers assume that everyone sees and accesses a webpage in the same way. Accessible website design recognizes these differences and does not require people to see, hear, or use a standard mouse in order to access the information and services provided.

Questions		Comments	Next Steps
1. Is there a policy that the public entity's webpages will be accessible, that is, in compliance with the W3C Web Content Accessibility Guidelines (WCAG) 2.0 or Section 508 Standards?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
2. Are the staff and contractors who are responsible for webpage and content development aware of the policy?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
3. Are the staff and contractors who are responsible for webpage and content development knowledgeable about these standards?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
4. Has the website been tested for compliance with either of these standards?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
5. If yes, have people with disabilities who use screen reading software and other assistive technology participated in the evaluation?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
6. Is there a plan for making the existing web content accessible?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.

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ADA Self-Evaluation – Website Accessibility
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Questions		Comments	Next Steps
7. Is there a plan for making future web content accessible?	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.
Other: Click here to enter text.	Yes ☐ No ☐	Click here to enter text.	Click here to enter text.

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ADA Self-Evaluation – Website Accessibility
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Chapter 7 Addendum 1:
Title II Checklist:
(Emergency Management)

PURPOSE OF THIS CHECKLIST: This checklist is designed for use as a preliminary assessment of your emergency management programs, policies, procedures, and shelter facilities. The goal is to look at your programs, policies, procedures, and shelter facilities to see if there are any potential ADA problems.

MATERIALS AND INFORMATION NEEDED: To assess the accessibility of your emergency management programs, policies, procedures, and shelter facilities, you will need:

✓   a copy of your emergency planning and preparedness documents;

✓   a copy of materials used to train employees and volunteers who perform emergency management functions;

✓   a copy of materials distributed to the public on emergency preparedness and emergency management and the procedures used for distribution of such materials;

✓   a copy of any current contracts or other documents reflecting your relationship with other public entities and/or private organizations to provide any services related to emergency management, such as planning, prevention, preparedness, evacuation, transportation, sheltering, medical services, lodging, housing, response, social services, recovery, clean-up, and remediation;

✓   a list of notification methods, procedures, materials, and equipment used to communicate information about emergencies to the public, including people with disabilities (in particular, communication with people who are deaf or hard of hearing and people who are blind or have low vision);

✓   a copy of your policies and procedures on emergency notification, evacuation, transportation, emergency shelters, emergency food and medical supplies, temporary lodging and housing, medical services, social services, and other emergency management services;

✓   a list of accessible transportation and lodging resources that can be used in an emergency for evacuation, return home following an evacuation, and/or temporary lodging and housing;

✓   a list of the facilities designated as emergency shelters, including mass care shelters, special needs shelters, and medical shelters;

✓   eligibility criteria, if any, for participation in emergency management programs, services, and activities, including mass care, special needs, and medical shelters; and

✓   copies of the "ADA Checklist for Emergency Shelters," located in Addendum 3 to this Chapter and at "http://www.ada.gov/pcatoolkit/chap7shelterchk.htm", and survey tools (metal tape measure, electronic (digital) level, pressure gauge, and digital camera).

General Emergency Management Policies and Procedures

1.   If you have a contract or other arrangement with any third party entities, such as the American Red Cross or another local government, to provide emergency planning and/or emergency management or response services, does your contract or other documentation of your arrangement contain policies and procedures to ensure that the third-party entities comply with ADA requirements, as outlined in Chapter 7 of this Tool Kit, including Addenda 2 and 3?

❏   Yes
❏   No
❏   N/A

2.   Do you have written procedures to ensure that you regularly seek and use input from persons with a variety of disabilities and organizations with expertise in disability issues in all phases of your emergency planning, such as those addressing preparation, notification, evacuation, transportation, sheltering, medical and social services, temporary lodging and/or housing, clean-up, and remediation?

❏   Yes
❏   No

3.   Do you seek input and participation from people with disabilities and organizations with expertise on disability issues when you stage emergency simulations and otherwise test your preparedness?

    ❏   Yes
    ❏   No

ACTIONS:

If the answer to any of the above questions is "No," this is a red flag that your emergency management program may not be fully accessible to people with disabilities. Here are some steps to ensure that your emergency management programs, policies, and procedures are accessible to people with disabilities.

✓   If your entity contracts or arranges with third party organizations to help with emergency preparedness or management, formalize in your agreements with those organizations their commitment to compliance with the requirements of Title II of the ADA, as set out in this Chapter, including the Addenda.

✓   On an ongoing basis, seek and use input from people with different types of disabilities (i.e., mobility, vision, hearing, cognitive, psychiatric, and other disabilities) and organizations with expertise on disability issues regarding all phases of your emergency management plan.

✓   When you stage simulations or otherwise test the effectiveness of your emergency planning and preparedness, include people with a variety of disabilities in your testing. For example, enlist people with disabilities to role-play during simulation exercises and provide feedback.

Planning for Emergency Notification and Evacuation

This section helps you identify potential ADA-related problems in your plans for the emergency notification and evacuation of people with disabilities. To ensure an accurate assessment of ADA compliance, this checklist should be completed with the input and assistance of those employees and contractors who are involved in your entity's emergency planning, notification, and evacuation programs, services, and activities.

4.	For planning purposes, have you determined the extent to which, in an emergency or disaster, people with disabilities who reside or visit your community are likely to need individualized notification, evacuation assistance, and/or transportation, including accessible transportation?

	❏	Yes
	❏	No

5.	Has your emergency planning identified the resources you will use to meet the needs of individuals with disabilities who require individualized notification, evacuation assistance, and/or transportation, including accessible transportation?

	❏	Yes
	❏	No

6.	If your emergency warning systems use sirens or other audible alerts, do you have written procedures to ensure the use of a combination of methods to provide prompt notification of emergencies to persons who are deaf or hard of hearing? (Note: Examples of methods that may be effective in communicating emergencies to people who are deaf or hard of hearing include auto-dialed TTY and taped telephone messages, text messaging, emails, open captioning on emergency broadcasts on local television stations, and dispatching qualified sign language interpreters to assist with emergency announcements that are televised.)

	❏	Yes
	❏	No

7.	Does your plan address the needs of people with disabilities who will require assistance leaving their homes?

	❏	Yes
	❏	No

8.	Do you have written procedures to ensure that your community evacuation plans enable people with a wide variety of disabilities to safely self-evacuate and, for those who cannot self-evacuate, to receive evacuation assistance ? (Note: The plans should address the evacuation

needs of people who have mobility disabilities, people who are blind or
have low vision, people who are deaf or hard of hearing, people with
cognitive and psychiatric disabilities, people with disabilities who use
service animals, and other people with disabilities who reside or visit your
community who may need evacuation assistance.)

❏ Yes
❏ No

9. Have you established a voluntary, confidential registry for persons with
disabilities to request individualized notification, evacuation assistance,
and transportation?

❏ Yes
❏ No

■ If you maintain such a registry, do you have written procedures to
ensure that it is voluntary, it has appropriate confidentiality controls,
the information in the registry is regularly updated, and outreach to
persons with disabilities and organizations with expertise on
disability issues is conducted to inform them of its availability?

❏ Yes
❏ No
❏ N/A

10. Does your emergency transportation plan identify accessible
transportation resources that will be available to evacuate persons with
mobility disabilities, including people who use wheelchairs or scooters,
people who use medical equipment, such as oxygen tanks, and people
who use service animals? (Accessible transportation consists of
wheelchair lift-equipped vehicles.)

❏ Yes
❏ No

11.   Do your emergency plans, policies, and procedures provide for people with disabilities to be evacuated and transported to shelters together with their families?

❏   Yes
❏   No

12.   Do your emergency management plans, policies, and procedures ensure that people with disabilities are not separated from their service animals during evacuation and transportation?

❏   Yes
❏   No

ACTIONS:

If the answer to any of the above questions is "No," this is a red flag that your emergency management program may not be fully accessible to people with disabilities. Here are some steps to ensure that your emergency notification and evacuation policies, procedures, and programs are accessible to people with disabilities.

✓   If you use emergency warning systems such as sirens or audible alerts, provide alternate ways to provide prompt notification of emergencies to people who are deaf or hard of hearing. Combine visual and audible alerts to reach a greater audience than either method would reach by itself. Consider using telephone calls with pre-recorded messages, auto-dialed TTY (teletypewriter) messages, text messaging, emails, and direct door-to-door contact with pre-registered individuals. Also use open captioning on emergency broadcasts on local television stations and dispatch qualified sign language interpreters when emergency announcements are televised.

✓   Adopt policies to ensure that your community evacuation plans enable people with disabilities, including those who have mobility, vision, hearing, cognitive, and psychiatric disabilities, to safely self-evacuate or be evacuated by others.

✓   Create voluntary, confidential registries of persons with disabilities who may need individualized notification, evacuation assistance, and/or transportation. Establish procedures to ensure that the registries are

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voluntary, guarantee confidentiality to those who register, and include a process to periodically update the information contained in the registry. Widely publicize the registries, including outreach to people with disabilities, organizations with expertise on disability issues, organizations that provide services to people with disabilities, and paratransit riders. Outreach should explain the purpose of the registries, provide assurances of confidentiality, explain procedures for registering, and include procedures for people who, because of their disabilities, need assistance in registering.

✓ Identify accessible modes of transportation, such as wheelchair lift-equipped school buses, transit buses, paratransit vans, and taxi cabs that will be available to help evacuate people with disabilities during an emergency. Ensure that your plan addresses the needs of people with disabilities, including those who use wheelchairs, scooters, medical equipment, and service animals as well as those who will need assistance getting from their homes to emergency transportation pick-up locations or staging areas.

Training First Responders, Staff, and Volunteers

13.   Have the following categories of individuals been trained on the information provided in Chapter 7, including Addenda 2 and 3?

a.   Emergency planners, those who designate facilities to be used as shelters, and those who make advance arrangements to address emergency staffing, equipment, medical supplies, food and beverages, and other emergency-related needs?

❏   Yes
❏   No

b.   Staff and volunteers who participate in notification activities?

❏   Yes
❏   No

c.   First responders and other staff and volunteers who deal with evacuation, transportation, and emergency-related security issues?

❏   Yes
❏   No

d.   Shelter staff and volunteers and those who will be involved in routing people to shelters and deciding shelter placements for people with disabilities and their families?

❏   Yes
❏   No

e.   Individuals involved in establishing and operating temporary housing or lodging programs?

❏   Yes
❏   No

f.   Individuals who will establish and operate emergency-related medical and social service programs?

❏   Yes
❏   No

g.   Individuals who will be responsible for repair, rebuilding, and continuity of program operations following an emergency or disaster?

❏   Yes
❏   No

ACTION:

If the answer to any of the above questions is "No," this is a red flag that your training programs for emergency management personnel and volunteers may not adequately address access issues for people with disabilities. Here are some steps to ensure that your training policies, procedures, and programs ensure access for people with disabilities.

✓   Ensure that emergency planners, those involved in emergency preparedness, first responders, and those involved in all other aspects of emergency management are trained in the requirements of Title II of the ADA, including the information provided in Chapter 7 and Addenda 2 and 3.

✓   Develop instructions for staff and volunteers who will perform duties related to emergency notification, evacuation, transportation, and the routing of people with disabilities and their families to, and placement of these individuals in, shelters.

✓   Develop site-specific instructions and training materials for "mass care," "medical," and "special needs" shelter volunteers and staff to ensure compliance with ADA requirements to provide access to programs, services, and activities offered at the shelter and to address any concerns raised by people with disabilities. Include in the instructions and training materials, the information in this Chapter, including Addenda 2 and 3 on shelter accessibility, eligibility criteria, effective communication, reasonable modifications in policies, practices, and procedures for service animals, and other reasonable modifications.

✓   Train individuals involved in the emergency management process to recognize issues that may affect people with a variety of disabilities and on the procedures to follow when access issues for individuals with disabilities arise during the course of an emergency or disaster, such as contacting your entity's ADA Incident Manager for guidance.

Physical Accessibility in Emergency Shelter Programs

This section helps you identify architectural barriers to access in your emergency shelter facilities. To ensure an accurate assessment of ADA compliance, this

checklist should be completed with the input and assistance of those employees, volunteers, and representatives of third party organizations that are involved in your emergency planning and sheltering programs.

14.   Have you conducted an accessibility survey of all of your emergency shelter facilities, whether owned by government or a private entity to determine if they comply with ADA requirements? *See* "ADA Checklist for Emergency Shelters," included in Addendum 3 to this Chapter.

    ❑   Yes
    ❑   No

15.   Have you identified access barriers at any of the shelter facilities?

    ❑   Yes
    ❑   No

16.   If you found barriers at emergency shelters, have you taken steps to ensure that the barriers are removed to provide (at a minimum) the following accessible features that comply with the requirements of the ADA Standards for Accessible Design (ADA Standards): parking, exterior route from the parking to the entrance, entrance, sleeping area, dining area, toilet facilities, bathing facilities, recreational areas, emergency exit, and interior routes to all of these areas?

    ❑   Yes
    ❑   No
    ❑   N/A

17.   If all barriers have not been removed from a shelter, have you identified an appropriate number of alternate shelters that provide (at a minimum) the following accessible features that comply with the requirements of the ADA Standards: parking, exterior route from the parking to the entrance, entrance, sleeping area, dining area, toilet facilities, bathing facilities, recreational areas, emergency exit, and interior routes to all of these areas?

    ❑   Yes
    ❑   No
    ❑   N/A

18.   Until all emergency shelters have the required accessible features
      referenced above, have you identified and widely publicized to the public
      and to persons with disabilities and disability organizations the most
      accessible emergency shelters and the accessible features that each has?

      ❏   Yes
      ❏   No
      ❏   N/A

19.   Have you adopted policies and procedures to ensure that shelter staff and
      volunteers maintain accessible routes for individuals who use wheelchairs
      and other mobility aids?

      ❏   Yes
      ❏   No

20.   Have you adopted procedures to minimize protruding objects and
      overhead objects in shelters so that someone who is blind or has low
      vision can walk safely throughout the shelter?

      ❏   Yes
      ❏   No

21.   Have you adopted policies and procedures for shelter staff and volunteers
      to offer wayfinding assistance to people who are blind and those with low
      vision who may need assistance in understanding and navigating the
      shelter layout and locating shelter facilities (*e.g.*, finding the route to the
      toilet room when furniture layouts change)?

      ❏   Yes
      ❏   No

22.   Have you established policies and procedures to ensure that, in the future,
      facilities are surveyed for accessibility and barriers to access are removed
      before a facility is designated as a shelter?

      ❏   Yes
      ❏   No

ACTIONS:

If the answer to any of the above questions is "No," this is a red flag that your emergency shelter program may not be fully accessible to people with disabilities. Here are some steps to ensure that your emergency shelters are physically accessible to people with disabilities.

✓ Survey your community's shelters for barriers to access for persons with disabilities. At a minimum, survey the parking, the path to the entrance, the entrance, sleeping and dining areas, toilet facilities, bathing facilities, first aid/medical facilities, recreation areas, and the routes to all of these areas. To conduct your survey, use the Department's technical assistance publication, "ADA Checklist for Emergency Shelters," which is included in Addendum 3 to this Chapter.

▸ If you find barriers to access, remove the barriers or work with the facility's owner to remove the barriers.

▸ If barriers cannot be removed, find another nearby facility that is – or can be made – accessible.

▸ Until all emergency shelters have the required accessible features (parking, route to the entrance, entrance, sleeping and dining areas, toilet facilities, bathing facilities, first aid/medical facilities, recreation areas, and the routes to all of these areas), identify and widely publicize the location and features of the most accessible emergency shelters to the public, including specific outreach to persons with disabilities, disability rights organizations, and organizations that provide services to people with disabilities.

✓ Adopt procedures to ensure that shelter staff and volunteers maintain accessible routes and minimize protruding objects. Beds and other furniture must be located so as to ensure that accessible routes are not blocked, and that protruding and overhead objects are minimized in all areas of the shelter.

✓ Also include procedures for staff and volunteers to offer wayfinding assistance to people who are blind or have low vision to provide orientation to the shelter environment and assistance in locating shelter areas or features.

✓ Establish policies and procedures to ensure that facilities being considered as possible emergency shelters in the future are surveyed

for accessibility using the "ADA Checklist for Emergency Shelters" and that barriers to access are removed before facilities are designated as emergency shelters.

Policies and Procedures in Emergency Shelters

23.   Do you have supplies of informational materials routinely handed out at emergency shelters available in alternative formats (Braille, large print) for people who are blind or have low vision?

❑   Yes
❑   No

24.   Have you adopted policies and procedures for shelter staff and volunteers to provide assistance to people who are blind or have low vision by reading and completing forms and other written materials that are not available in alternative formats?

❑   Yes
❑   No

25.   Do any of your shelters have low-stimulation "stress-relief zones," such as an empty classroom in a school building used as an emergency shelter?

❑   Yes
❑   No

■   If you offer "stress-relief zones," have you adopted policies and procedures to make these areas available on a priority basis to people whose disabilities are aggravated by stress?

❑   Yes
❑   No
❑   N/A

26. Have you adopted emergency shelter eligibility policies and procedures to ensure that people with disabilities are housed at "mass care" shelters unless they are medically fragile?

   ❏ Yes
   ❏ No

27. Have you adopted "mass care" shelter procedures to ensure that shelter staff and volunteers do not turn away people with disabilities who may need assistance with activities of daily living even though their personal care aides may not be with them?

   ❏ Yes
   ❏ No

28. Have you adopted policies and procedures to ensure that "mass care," "special needs," and "medical" shelter staff and volunteers are trained and monitored so they provide safe, appropriate assistance with activities of daily living (e.g., eating, dressing, personal hygiene, transferring to and from wheelchairs) that some people with disabilities may require?

   ❏ Yes
   ❏ No

29. If you provide a "special needs" or "medical" shelter, have you adopted eligibility policies and procedures to ensure that people with disabilities are not housed in such shelters just because they have a disability? (Note: Special needs and medical shelters are for medically fragile people who require the type of care provided in hospitals and nursing homes. Most people with disabilities are not medically fragile. The ADA requires emergency managers and shelter operators to accommodate people with disabilities in the most integrated setting appropriate to their needs.)

   ❏ Yes
   ❏ No
   ❏ N/A

30.   Have your shelter staff and volunteers received training with site-specific
        instructions for providing people with disabilities access to all services,
        activities, and programs at "mass care," "medical," and "special needs"
        shelters?

        ❏   Yes
        ❏   No

31.   Do you have written policies and procedures to ensure that people who
        are deaf or hard of hearing, people with speech disabilities, and people
        who are blind or have low vision are provided with effective
        communication during their stay at a shelter?

        ❏   Yes
        ❏   No

32.   Do you provide a TTY at each emergency shelter for use by people who
        are deaf, are hard of hearing, or have speech disabilities?

        ❏   Yes
        ❏   No

33.   Do you have written procedures to ensure that persons with disabilities
        who use service animals are not separated from their service animals
        when using emergency shelters and have full access to shelter programs,
        services, and activities, even if pets are normally prohibited in shelters or
        in certain areas of shelters?

        ❏   Yes
        ❏   No

34.   Do you have written procedures to ensure that food, water, and a
        receptacle and plastic bags for the disposal of service animal waste are
        available at emergency shelters?

        ❏   Yes
        ❏   No

35.   Have you established security procedures at shelters that allow people with service animals to take their animals outside for relief without unnecessary delays for security screening upon re-entry?

❑   Yes
❑   No

36.   Do you have written procedures to ensure that emergency shelters have back-up generators and a way to keep medications refrigerated (such as a refrigerator or a cooler with ice)?

❑   Yes
❑   No

37.   Do your written procedures on back-up generators include a plan for routinely notifying the public and disability groups of the location of shelters providing electricity and refrigeration?

❑   Yes
❑   No

38.   Does your emergency management plan provide an effective way for people with disabilities to request and receive durable medical equipment and medication while in shelters?

❑   Yes
❑   No

39.   Have you established procedures for people with disabilities to request and receive cots or beds, modifications to cots or beds, securement of cots or beds to allow safe transfer to a wheelchair, and placement of cots or beds in specific locations when needed?

❑   Yes
❑   No

40.   Have you adopted kitchen access policies to provide immediate access to food and refrigerated medications for shelter residents and volunteers whose disabilities may require it?

❏   Yes
❏   No

41.   Does your emergency management plan ensure that at least some kinds of foods and beverages are available in emergency shelters for people with dietary restrictions, such as people who have diabetes or severe food allergies?

❏   Yes
❏   No

ACTIONS:

If the answer to any of the above questions is "No," this is a red flag that your emergency shelter program may not be fully accessible to people with disabilities. Here are some steps to ensure that the policies and procedures relating to your emergency shelter programs are accessible to people with disabilities.

✓   Adopt procedures to provide effective communication for people who are deaf or hard of hearing, people with severe speech disabilities, and people who are blind or have low vision. Train staff on the basic procedures for providing effective communication, including exchanging notes or posting written announcements to go with spoken announcements. Provide a TTY in each shelter for persons who are deaf, are hard of hearing, or have speech disabilities. Provide interpreters when necessary to ensure effective communication. Train staff and volunteers to read printed information, upon request, to persons who are blind or who have low vision.

✓   If space permits, offer low-stimulation "stress-relief zones."   Adopt policies and procedures to make these areas available on a priority basis to people whose disabilities are aggravated by stress.

✓   Adopt eligibility policies and procedures that ensure that people with disabilities are housed in "mass care" shelters unless they are medically fragile. The procedures should ensure that shelter staff and volunteers accept people with disabilities who need some assistance with activities

of daily living even though their personal care aides may not be with them. Also, provide training and monitoring for staff and volunteers on safe, appropriate procedures for providing assistance in daily living activities to people with disabilities who require such assistance.

✓   If you provide a "special needs" or "medical" shelter, adopt eligibility policies and procedures to ensure that emergency managers do not require people with disabilities to stay in these shelters solely because they have a disability. Special needs and medical shelters are intended to house people who are medically fragile, such as those who require hospital or nursing home care. The ADA requires emergency managers and shelter operators to accommodate people with disabilities in the most integrated setting appropriate to their needs.

✓   Modify "no pets" policies to allow people with disabilities to stay in shelters – and participate in shelter programs, services, and activities – with their service animals. Also, provide food, water, and waste-disposal supplies for service animals.

✓   Ensure that a reasonable number of shelters have back-up generators and a way to keep medications refrigerated (such as a refrigerator or a cooler with ice). Make these shelters available on a priority basis to people whose disabilities require access to electricity and refrigeration. Until all shelters have back-up generators and refrigeration capacity, routinely notify the public about the location of the shelters that have these features.

✓   Establish policies and procedures ensuring that people who need electricity for life-sustaining equipment have priority access to it when it is available and that priority access is also provided, where feasible, for people with disabilities who rely on electrically powered mobility devices.

✓   Establish policies and procedures, and make advance arrangements for resources to ensure that there is an effective way for people with disabilities to request and receive durable medical equipment and medication.

✓   Establish policies and procedures and make advance resource arrangements so that people with disabilities can request cots and beds, modifications to cots and beds, securement of cots and beds, and specific placement of cots, beds, or sleeping mats when needed. In shelters where people will generally be expected to use sleeping mats placed on the floor, ensure that some cots and beds are available for people with disabilities who are unable to use sleeping mats. The

procedures on cots and beds should provide for staff and volunteers to consult with people with disabilities about their needs and provide necessary accommodations.

✓ Modify kitchen-access policies so that residents and volunteers whose disabilities may require it can obtain immediate access to food and refrigerated medication. Also, in planning food supplies for shelters, ensure that at least some kinds of foods and beverages are available for people with dietary restrictions, such as diabetes or severe food allergies.

Medical and Social Services

42.   Have you established policies and procedures to ensure that medical and social services and other benefit programs are accessible to people with disabilities, including people who use wheelchairs, scooters, and other mobility aids, individuals who cannot leave shelters because of their disabilities, and people who use service animals?

❑   Yes
❑   No

43.   Have you established policies and procedures to ensure that application processes for benefit programs are designed so they do not exclude people with disabilities whose disabilities prevent them from using one particular type of application process (*e.g.*, web-based application processes, telephone-based application processes, procedures requiring applicants to have a valid driver's license, or procedures requiring applicants to apply in person)?

❑   Yes
❑   No

44. Do you have policies and procedures to ensure that your medical, social service, and other benefit programs provide effective communication to people with disabilities, including people who are deaf or hard of hearing and people who are blind or have low vision?

 ❏ Yes
 ❏ No

 ■ Do your policies and procedures include primary consideration of the communication method preferred by an individual with a disability?

  ❏ Yes
  ❏ No
  ❏ N/A

ACTIONS:

If the answer to any of the above questions is "No," this is a red flag that the medical and social services your entity provides may not be fully accessible to people with disabilities. Here are some steps to ensure that the policies and procedures relating to your medical and social services are accessible to people with disabilities.

✓ Establish policies and procedures to ensure that medical, social service, and other benefit programs are accessible to people with disabilities, including people who use wheelchairs, scooters, and other mobility aids and people who use service animals.

✓ Establish policies and procedures to ensure that medical, social service, and other benefit programs do not have eligibility criteria that screen out or tend to screen out people with disabilities, or application processes or procedures that deny access to people with disabilities.

✓ Establish policies and procedures to ensure that medical, social service, and other benefit programs provide effective communication to people with disabilities, including primary consideration of the method of communication preferred by an individual with a disability.

Post-Sheltering Policies and Procedures

45. Have you adopted procedures to provide additional time, transportation, and search assistance for people with disabilities in emergency shelters to locate accessible temporary housing and support services in the community following an emergency?

   ❏ Yes
   ❏ No

46. If you have a program to provide temporary housing to persons when they leave emergency shelters but cannot yet return home (*e.g.*, housing in dormitories, rooms at lodging facilities, trailers), have you adopted a plan for providing prompt, equivalent temporary housing to persons with disabilities, including accessible housing for people who use wheelchairs, scooters, and other mobility aids and people who are deaf or hard of hearing?

   ❏ Yes
   ❏ No
   ❏ N/A

47. If you have a temporary housing program, do your information materials on temporary housing include information on accessible housing (such as the specific location of accessible hotel rooms within the community or in nearby communities and transportation resources available in that area)?

   ❏ Yes
   ❏ No
   ❏ N/A

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│                        ACTIONS:                             │
│                                                             │
│  If the answer to any of the above questions is "No," this  │
│  is a red flag that your emergency management and           │
│  post-shelter programs may not be fully accessible to       │
│  people with disabilities.  Here are some steps to ensure   │
│  that your post-shelter policies, procedures, and programs  │
│  are accessible to people with disabilities.               │
│                                                             │
│  ✓    Modify policies, as necessary, to provide             │
│       transportation, search assistance, and additional     │
│       time in shelters to individuals with disabilities     │
│       who are attempting to locate housing.                 │
│                                                             │
│  ✓    Identify temporary accessible housing (such as        │
│       accessible hotel rooms within the community or in     │
│       nearby communities) that could be used if people      │
│       with disabilities cannot immediately return home      │
│       after a disaster. Consider establishing temporary     │
│       housing procedures to ensure that accessible hotel    │
│       rooms are available on a priority basis to people     │
│       with disabilities who need them.                      │
│                                                             │
│  ✓    Establish policies and procedures to ensure that      │
│       temporary housing information distributed to the      │
│       public or to shelter residents includes              │
│       information on accessible housing and transportation  │
│       resources.                                            │
│                                                             │
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Post-Emergency Repair, Rebuilding, and Resumption of Program Operations

48.   Have you established policies and procedures to ensure that the repair and rebuilding of government facilities comply with the accessibility requirements of Title II of the ADA?

    ❏   Yes
    ❏   No

49.   Have you established policies to ensure that programs relocated from a damaged facility on a temporary or permanent basis remain accessible to people with disabilities?

    ❏   Yes
    ❏   No

ACTIONS:

If the answer to any of the above questions is "No," this is a red flag that your post-emergency policies and procedures may not be fully accessible to people with disabilities. Here are some steps to ensure that your post-emergency policies and procedures ensure access for people with disabilities.

✓ Establish policies and procedures to ensure that facilities constructed or altered because of emergency- or disaster-related damage comply with the accessibility requirements of Title II of the ADA. Facilities constructed after January 26, 1992, and repairs to such facilities, must comply with Title II's new construction requirements. Alterations to facilities constructed before the ADA became effective, must comply with Title II's requirements for alterations to existing facilities. Alterations may not decrease accessibility.

✓ Establish policies and procedures to ensure that programs relocated from a damaged facility remain accessible to people with disabilities, whether the relocation is permanent or temporary. Ensure that continuity of operations plans address continuity of access to programs, services, and activities for people with disabilities. Ensure that repair and clean-up activities include the maintenance of accessible features.