

Access AmeriCorps

SECTION I: Recruitment/Accommodation Practices

The following portion of the checklist reviews recommended recruitment and accommodation practices for AmeriCorps programs. Not only does it outline what you are required to do, but it also asks you to evaluate your efforts to date and provides helpful hints.

Access AmeriCorps recommends that the following steps be taken:

- Completion of this checklist
- Development of internal action steps to rectify issues identified as a result of the self-evaluation
- Development of written organization wide policies
- Maintenance of this self-evaluation and supporting/resulting documents on file
- Annual review of this self-evaluation

There may be terminology that you do not understand. Please refer to the end of the checklist for an explanation of the questions and the terminology. If you have additional questions, please call your State Commission for clarification.

1) Has your program affirmatively sought to recruit and retain qualified Members with disabilities?

Yes _____

No _____

a) What steps have been taken to meet this goal?

b) Have you been successful?

c) How do you know?

2) Do you have a written policy concerning discrimination on the basis of physical or mental disability?

Yes _____

No _____

3) Do you regularly review your recruitment practices (recruitment, training, tenure, disciplinary actions) to be certain that you, your managers, supervisors, or external consultants are non-discriminatory in the treatment of applicants and Members with disabilities?

Yes _____

No _____

4) Medical records must be kept in a separate location from non-medical records. Access to medical records must be limited. Are all Members' non-medical records kept in a separate place from records that contain medical information? (Medical information includes insurance application forms as well as health certificates, results of physical exams, etc.)

Yes _____

No _____

a) Do you have a written policy regarding who has access to medical information?

Yes _____

No _____

- 5) Do your recruitment materials, including photos and ad copy, contain positive images of persons with disabilities and indicate your program's commitment to inclusion of persons with disabilities?
Yes _____
No _____
- 6) Are inquiries related to the presence of a disability or the possible presence of a disability that a Member or potential Member may have limited to performance of essential functions of service positions and requirements for reasonable accommodations?
Yes _____
No _____
- a) Are supervisory staff aware of what constitutes legal and illegal inquiries?
Yes _____
No _____
- b) If 'yes', how did they obtain this information? Describe. For example, did they participate in a training session? read relevant literature? etc.

- 7) Have service descriptions been analyzed to determine which functions of a Member's service are 'essential' and which are 'marginal'?
Yes _____
No _____
- a) If 'yes', describe the process for doing this.

- b) Are service descriptions in writing?
Yes _____
No _____
- 8) Are any of the following questions asked during the recruitment or application process?
- a) Health or physical condition
Yes _____
No _____
- b) Physical or mental problems or disabilities
Yes _____
No _____
- c) Medical history
Yes _____
No _____
- d) Previous workers' compensation claims
Yes _____
No _____
- e) Prior health insurance claims
Yes _____
No _____
- f) Past drug use or substance abuse
Yes _____
No _____
- 9) Do you require that applicants for AmeriCorps positions take any of the following tests as part of the application process?

- a) Drug or alcohol test
Yes _____
No _____
- b) HIV tests
Yes _____
No _____
- c) Skill or performance tests
Yes _____
No _____
- d) Psychological tests
Yes _____
No _____
- e) Intelligence tests
Yes _____
No _____

10) Do you have a substance abuse policy?
Yes _____
No _____

11) Do you have a Member drug testing policy?
Yes _____
No _____

12) It is required that reasonable accommodation be provided to Members with disabilities. Reasonable accommodation includes a broad range of adaptations to the manner or circumstances in which a service activity is performed, an interview is conducted, etc.

Reasonable accommodation might include:

- allowing an individual with a psychiatric disability to periodically leave early or arrive late and later make up that time
- making structural modifications to accommodate a participant who uses a wheelchair
- providing auxiliary aids and services including sign language interpreters, readers (for people who do not read print due to a disability) or providing material in alternative format such as Braille, ASCII disk, etc.

a) Have Members and applicants been informed that they are entitled to reasonable accommodations?
Yes _____
No _____

b) If 'yes', how have they been so informed?

c) Are reasonable accommodations provided to AmeriCorps Members with disabilities?
Yes _____
No _____

d) How do you know?

e) Has a written reasonable accommodations policy been developed?
Yes _____
No _____

f) Do supervisory staff know how to proceed if an accommodation is requested?
Yes _____
No _____

g) Has a specific supervisory staff member been designated to coordinate reasonable accommodation, including determining when an accommodation is or is not reasonable and

- when a funding request will be made of the Commission? (Note: This is not required, but recommended.)
 Yes _____
 No _____
- h) Do they know how to secure a sign language interpreter if necessary?
 Yes _____
 No _____
- i) Do they know how to get material transcribed into Braille, recorded on audio cassette, or placed diskette in text format?
 Yes _____
 No _____
- 13) Are, as a matter of policy, interviews, Member/staff meetings and other gatherings held in accessible locations? (Accessible locations include accessible entrances, meeting areas, and rest rooms.)
 Yes _____
 No _____
- 14) Are off-site Member/staff training's, holiday parties, picnics or other gatherings held in accessible locations?
 Yes _____
 No _____
- 15) Are reasonable accommodations, including sign language interpreters, written materials in alternative format, etc. provided to individuals with disabilities at off-site meetings, training's, and social events?
 Yes _____
 No _____

Follow-up: Section I Recruitment/Accommodation Practices

- 1) Has your program affirmatively sought to recruit and retain qualified Members with disabilities?
- AmeriCorps programs need to affirmatively include persons with disabilities in recruitment efforts. This means that recruitment activities need to be accessible and that reasonable accommodations may have to be made. The affirmative obligation is found in the National and Community Service Act of 1990, as amended.
 - AmeriCorps programs should be able to outline what they have done in order to recruit persons with disabilities (e.g., contacting independent living centers, providing recruitment information in large print, ensuring that meetings are held in accessible locations, including pictures of Members with disabilities in recruitment brochures).
 - Remember, we are striving for an AmeriCorps that looks like America. Forty-nine million Americans have disabilities.
- 2) Do you have a written policy concerning discrimination on the basis of physical or mental disability?
- Programs and commissions should include an anti-discrimination statement about disability with their general anti-discrimination statement: "AmeriCorps does not discriminate on the basis of race, sex, gender, national origin, color, political affiliation, religion, age or disability."
- 3) Do you regularly review your recruitment practices (recruitment, training, tenure, disciplinary actions) to be certain that you, your managers, supervisors and external consultants are nondiscriminatory in the treatment of applicants and members with disabilities?
- It is not enough to review practices once and then assume that they are nondiscriminatory forever. New staff are always being hired, incumbent staff can fall into old practices, and biases and stereotypes are difficult to erase. Regular review of practices, perhaps every six months, depending on your program and your schedule of events, is highly recommended.

- 4) Medical records must be kept in a separate location from non-medical records. Access to medical records must be limited. Are all members' non-medical records kept in a separate place from records that contain medical information?
 - Medical records should be kept in a locked file, and access should be limited to those who truly need to know. Further, information that relates to reasonable accommodation should be kept with medical information and not in a Member's general file.
 - i) Do you have a written policy regarding who has access to medical information?
 - A written policy serves to protect the program.
 - ii) What is the policy?
 - A copy should be attached to the self-evaluation document.
- 5) Do your recruitment materials, including photos and ad copy, contain positive images of persons with disabilities and indicate your program's commitment to the inclusion of persons with disabilities?
 - Recruitment and other advertising materials should include images of persons with disabilities, and copy should mention the participation of persons with disabilities. The message of inclusion needs to be carried out throughout your recruitment process, not just in the part that specifically relates to outreach to persons with disabilities.
- 6) Are inquiries related to the presence of a disability or the possible presence of a disability that a member or potential member may have limited to performance or essential functions of service positions and requirements for reasonable accommodations?
 - You can ask how a member would perform service activities with or without reasonable accommodations. You cannot ask how a member acquired his/her disability, how s/he feels about it, what s/he has done about it, how long s/he has had a disability, or what s/he has learned from it. These are personal questions and are not appropriate in a recruitment setting.
 - a) Are supervisory staff aware of what constitutes legal and illegal inquiries under the ADA/Section 504?
 - b) If yes, how did they obtain this information? Describe. For example, did they participate in a training session? Read relevant literature?
 - Supervisory staff, and those conducting recruitment interviews, should be aware of what constitutes legal and illegal inquiries in this area. Programs should be aware of how staff are trained. For example, managers often assume that staff is aware of what is legal and illegal, but when asked, cannot describe how staff know that information. Training should be on-going and periodic, and should be conducted by reputable organizations and individuals.
 - c) Have service descriptions been analyzed to determine which functions of a member's service are essential' and which are marginal'? If yes', describe the process for doing this.
 - d) Are service descriptions in writing?
 - Service descriptions should be reviewed to determine what the essential functions are. This review should occur at least once a year. As programs grow and learn, service descriptions may change and adjustments may be required. A process needs to be in place to ensure that changes are incorporated into the descriptions. Service descriptions should be in writing so that documentation of the essential functions of the service position is available.
 - e) Are any of the following questions asked during the recruitment or application process?
 - It is illegal to ask questions that would reveal information about the health or presence of disability in the recruitment process. These questions are simply examples of questions that can reveal the presence of a disability.
- 7) Do you require that applicants for AmeriCorps positions take any of the following tests as part of an application process?
 - a) Drug or alcohol test:
 - The ADA is neutral on drug testing. This simply means that the ADA does not address the issue of drug testing, and that programs need to look to other state and federal law and policies to determine the legality of drug and alcohol testing.
 - b) HIV tests:

- HIV is considered a disability, and it is illegal to require that applicants undergo a test for HIV.
 - c) Skill or performance tests:
 - Programs can administer skill and performance tests if the skills tested are required in order to perform the essential functions of the service.
 - d) Psychological tests:
 - Psychological tests are allowable only if they specifically relate to the essential functions of the service description.
 - e) Intelligence tests:
 - An intelligence test can only be administered if there is clear and convincing evidence that a certain level of intelligence is required to perform the service.
 - Remember, the burden of proof is on the AmeriCorps program that may want to administer such exams to show that the level of skill measured by such tests is clearly essential to the performance of the service description. All such testing must be administered to all applicants.
- 8) Do you have a substance abuse policy?
 - Policies relating to substance abuse should be reviewed to ensure that they do not discriminate against members who are in recovery from substance abuse.
- 9) Do you have a member drug testing policy?
 - Drug testing policies should be reviewed to ensure that they do not single out Members with disabilities.
- 10) It is required that reasonable accommodation be provided to members with disabilities. Reasonable accommodation includes a broad range of adaptations to the manner or circumstances in which a service is performed, an interview is conducted, etc.
 - a) Have members and applicants been informed that they are entitled to reasonable accommodations?
 - Everyone needs to know that your AmeriCorps program has a policy to provide reasonable accommodations. It is not enough assume that people who need accommodations are aware of this. Nor is it enough to only let identified persons with disabilities know. Everyone who is a potential participant in your program needs to be aware of the availability of reasonable accommodations.
 - b) If 'yes', how have they been so informed?
 - AmeriCorps programs should be able to document how they inform their audience that reasonable accommodations are available.
 - c) Are reasonable accommodations provided to AmeriCorps members with disabilities?
 - If you truly have full participation of members with disabilities, reasonable accommodations are probably being provided.
 - d) How do you know?
 - AmeriCorps programs should have some way of determining and tracking the provision and effectiveness of reasonable accommodations that are provided.
 - e) Has a written reasonable accommodation policy been developed?
 - A written policy that states a program's ability and willingness to provide reasonable accommodations is a proactive way of letting people with disabilities know that they are welcome in your program.
 - f) Do supervisory staff know how to proceed if an accommodation is requested?
 - Often, programs are very willing to provide reasonable accommodations, but when requested, they are unsure how to go about actually securing the accommodation. It is important that programs be prepared and able to do so.
 - g) Has a specific supervisory staff person been designated to coordinate reasonable accommodation, including determining when an accommodation is or is not reasonable, and when a funding request will be made of the Commission?
 - It is not required that a specific person be identified. It is often helpful, however, especially when a program lacks institutionalized experience in providing reasonable accommodations.

- h) Do they know how to secure a sign language interpreter if necessary? Do they know how to have material transcribed into Braille, recorded on audio cassette, or placed on an ASCII disk?
 - These are two methods of measuring the ability of staff to provide reasonable accommodations when they are requested.
- 11) Are interviews, member's staff meetings, and other gatherings held, as a matter of policy, in accessible locations?
- 12) Are off site members staff training, holiday parties, picnics or other gatherings held in accessible locations?
- 13) Are reasonable accommodations, including sign language interpreters, written materials in alternative format, and so forth, provided to individuals with disabilities at meetings, training sessions and other events?
 - These are three ways of measuring the level of institutionalization of inclusion of persons with disabilities

Concluding Note:

Even if there are currently no persons with disabilities in your program, activities should still be conducted in accessible forums and in an accessible manner for two reasons. One, a clear message is sent to the general public and to the disability community that access and inclusion are important to AmeriCorps. Two, practice leads to improvement, knowledge, and preparation. An AmeriCorps program that considers accessibility a priority will be far more successful in recruiting and retaining individuals with disabilities.

SECTION II: General Non-Discrimination Obligations

Programs have had the opportunity to examine how well they are ensuring that discrimination does not occur against Members with disabilities. Obligations for AmeriCorps programs extend beyond Members with disabilities to include the general public. AmeriCorps programs must provide equal opportunity to individuals with disabilities that they serve, as well. For example, an AmeriCorps program would be prohibited from excluding a qualified child with a disability from an after-school literacy program on the basis of their disability. The following checklist will assist you in determining how well you are complying with these obligations.

1) People with disabilities may not be excluded from services or from being a recipient of National and Community Service activities.

a) Are there any circumstances where a person with a disability would be prohibited from receiving services from an AmeriCorps program?

Yes _____

No _____

i) If 'yes', please describe.

2) People with disabilities must have an equal opportunity to participate in programs and activities if they meet eligibility criteria for participation.

a) Are there any circumstances where an individual with a disability would receive a lesser or different benefit than an individual without a disability?

Yes _____

No _____

i) If 'yes', please describe.

ii) If 'yes', is there a way to equalize participation?

3) Surcharges may not be imposed on people with disabilities. Are participants/members of the public with disabilities ever charged an extra fee for program modifications, effective communication, or structural modification costs?

Yes _____

No _____

4) Unless doing so constitutes a fundamental alteration, undue financial burden or undue administrative burden to the program, reasonable modifications to policies, practices, and procedures must be made to enable a person with a disability to benefit from the program.

a) Are program staff aware that they have the obligation to make reasonable modifications to policies, practices, and procedures when necessary to enable people with disabilities to receive services or benefit from the program?

Yes _____

No _____

i) How do you know?

5) Has an individual on staff been designated to make determinations about proposed changes to policies and practices or accommodations?

Yes _____

No _____

6) Have program staff received any training or instruction on under what circumstances such modifications or changes might be necessary?

Yes _____

No _____

a) If yes', please describe.

b) Has that training been effective?

Yes _____

No _____

c) How do you know?

7) Have program staff received training in disability as a diversity issue? (This would include training about disability awareness, civil rights, sensitivity and so forth).

Yes _____

No _____

8) Services must be provided to individuals with disabilities in the most appropriate integrated setting. This does not prohibit the establishment of separate programs for people with disabilities, e.g. an AIDS program as long as people with AIDS are not prohibited from participating in regular programs.

a) Are there instances where members of the public with disabilities are provided services in a separate or segregated setting?

Yes _____

No _____

i) If 'yes', please describe.

9) When an AmeriCorps program contracts with an outside organization to provide services on the program's behalf (such as training) the program is still responsible for ensuring that the contractor does not discriminate against people with disabilities.

a) Has your program notified contractors of its obligation to comply with your level of obligation under the ADA and Section 504?

Yes _____

No _____

b) Have you required that they make assurances to that effect?

Yes _____

No _____

10) Please describe these assurances. (A copy of contractual assurances should be attached.)

Follow-up: Section II General Non-Discrimination Obligations

- 1) Qualified people with disabilities may not be excluded from becoming members or from being a recipient of national and community service activities.

Are there any circumstances under which a person with a disability would be prohibited from receiving services from an AmeriCorps program?

- If there are circumstances under which a person with a disability would be prohibited from receiving services from an AmeriCorps program, they need to be closely examined to ensure that they are not in fact, discriminatory. Most often, these circumstances will arise due to eligibility criteria or policies of a program. In such cases, it is critical that clear documentation and evidence be provided that demonstrates a need for such policies or criteria. If such documentation cannot be provided, the criteria and/or policies should probably be changed.

- 2) People with disabilities must have an equal opportunity to participate in programs and activities if they meet eligibility criteria for participation.

- If there are circumstances under which an individual with a disability would receive a lesser or different benefit than an individual without a disability, these circumstances must be evaluated to determine if there is a way to "equalize" the benefit and create a higher level of access. Such equalization may require changes in policy or procedure, architectural modifications, or reasonable accommodations.

- 3) Surcharges may not be imposed on people with disabilities.

Are participants/members with disabilities ever charged an extra fee for program modifications, effective communication, or structural modifications?

- Surcharges or fees to cover the costs of accommodations are never allowed.

- 4) Unless doing so constitutes a fundamental alteration, undue financial burden, or undue administrative burden to the program, reasonable modifications to policies, practices, and procedures must be made to enable a person with a disability to benefit from the program.

Are program staff aware that they have the obligation to make reasonable modifications to policies, practices and procedures when necessary to enable persons with disabilities to receive services or benefit from the program?

- In many situations, problems and complaints arise because program staff are not aware of what programs are obligated to do. It is important that administrative steps be taken to ensure that no one is denied access due to a disability before a comprehensive review and assessment of the situation is conducted.

How do you know?

- Once again, it is never a good idea to assume that staff is aware of an obligation. Training should be conducted on an ongoing and periodic basis.

- 5) Has an individual on staff been designated to make determinations about proposed changes to policies and practices or accommodations?

- It is not required that a specific person be identified, but it is often helpful, especially when a program lacks institutionalized experience in providing reasonable accommodations.

- 6) Have all program staff members received any training or instruction on circumstances under which such modifications or changes might be necessary?

a) If 'yes,' please describe.

(1) Has that training been effective?

(2) How do you know?

- Training in this area is important. This question is a way of thinking about training that has been provided and to evaluating the effectiveness of such training.

- 7) Have all program staff members received training in disability as a diversity issue?
- Inclusion of persons with disabilities is often thought of as a charitable or special project that programs undertake. In fact, persons with disabilities are part of the spectrum of diversity that we strive to include in AmeriCorps programs. Thinking about persons with disabilities as a demographic group that has far too often been excluded from full participation can lead the way to a very different, and more inclusive, way of thinking on the part of program staff and members.
- 8) Services must be provided to individuals with disabilities in the most integrated setting. This does not prohibit the establishment of separate programs for people with disabilities, e.g. an AIDS program, as long as people with AIDS are not prohibited from participating in regular programs. Are there instances where members of the public with disabilities are provided services in a separate or segregated setting? If yes, please describe.
- The provision of segregated services is not inherently wrong. However, such situations need to be closely examined to ensure that they do not exclude persons from participating in non-segregated or regular settings.
- 9) When an AmeriCorps program contracts with an outside organization to provide services on the program's behalf (such as training) the program is still responsible for ensuring that the contractor does not discriminate against people with disabilities. Has your program notified the contractor of its obligation to comply with your level of obligation under the ADA and Section 504? Have you required that they make assurances to that effect?
- 10) Please describe these assurances.
- It is important to consider what others may do. In some situations, organizations have engaged in discriminatory behavior by "contracting out" and allowing someone else to discriminate. Therefore, it is important to ensure that you are contracting with organizations and individuals that are aware of their obligations, and that are nondiscriminatory in nature and action.
 - It is acceptable to use a standard clause in your contract and agreement language. It is far more effective, however, to take additional steps to ensure that contractors are in compliance. Some suggested steps are:
 - Ask for a copy of its 504 or ADA self-evaluation (for organizations that receive federal funds).
 - Ask the contractor to complete this checklist.
 - Ask for a separate letter of assurance, outlining its compliance with the ADA/Section 504.
 - Ask about its experience with people with disabilities.

Concluding Note:

This section concerns accessibility in a holistic way: How do programs interact with the general public? Obligations under federal law are not limited to identified members with disabilities. Rather, they extend to all aspects of an AmeriCorps program.

Programs will encounter people with disabilities in a variety of different relationships: as members, as staff, as recipients of service and as supporters.

SECTION III: Communications Accessibility

Communications access refers to the way that information is received and transmitted. When evaluating your program in terms of access to communication, you will be assessing the four different ways in which communication occurs: aural, oral, cognitive and visual. It is important to keep in mind that there are four distinct, broad populations that are affected by your level of accessibility in this area. These are: persons with impaired hearing, speech, cognition and vision. In some ways, communications access is more challenging to provide than architectural access. A well-built and designed ramp will provide access to a wide variety of persons with mobility impairments. Large print, on the other hand, will only provide access to a portion of the population with visual impairments.

- 1) Does the program have information that is communicated visually? (Note: information communicated visually includes brochures, enrollment forms, handbooks, videotapes, flip charts, slides, posters, graphic directional signs, and so forth.)

Yes _____

No _____

- 2) Does the program involve information that is communicated verbally?

Yes _____

No _____

- 3) Does the program inform persons with disabilities that communications aids and services are provided upon request? (Note: It is not sufficient solely to inform persons who have identified themselves as having an accommodation need. You must be able to inform the public-at-large).

Yes _____

No _____

- a) How do you do so?

- 4) Does the program have a procedure for deciding which auxiliary aids and services to provide?

Yes _____

No _____

- 5) Does the procedure provide for consideration of an individual's preferred aid or service?

Yes _____

No _____

- 6) Does the procedure include a mechanism for determining that an aid or service that is provided, other than that requested, is equally effective?

Yes _____

No _____

- 7) Does the program communicate with the public over the phone?

Yes _____

No _____

- 8) Are telephone conversations lengthy, complex, technical or personal?

Yes _____

No _____

- 9) Does the program have a TDD?

Yes _____

No _____

- 10) If so, have staff been trained on the appropriate use of a TDD?
 Yes _____
 No _____
- 11) Is there a mechanism for re-training?
 Yes _____
 No _____
- 12) Are staff trained in the use of the relay system?
 Yes _____
 No _____
- 13) Are staff aware of the relay number?
 Yes _____
 No _____
- 14) Does the program have a Web page?
 Yes _____
 No _____
- 15) Is the Web page captioned?
 Yes _____
 No _____
- 16) Is there a mechanism for ensuring that people who are deaf or hearing impaired are aware of an activated fire or smoke alarm?
 Yes _____
 No _____
- 17) Is there an established emergency evacuation procedure that addresses the needs of persons with disabilities? (This should include the evacuation of persons with mobility impairments.)
 Yes _____
 No _____
- 18) Have staff been trained in this procedure?
 Yes _____
 No _____
- a) Please describe the training.
- _____
- _____
- _____

Follow-up: Section III Communications Accessibility

1. Does the program have information that is communicated visually?
- The chart outlines eight possible ways that information presented visually can be made accessible to persons with visual impairments.
 - Not all of these formats are appropriate for all types of information and not all are usable for all persons with vision loss. For example, many visually impaired persons do not use Braille. Large print is only useful to persons who still have some vision. Readers are not useful in classroom settings.
 - It is recommended that materials that are used frequently or that are distributed to the general public are available in at least one alternative format. This can be as simple as

saving materials in text format on disk. You may want to consider printing recruitment brochures in large print so that they are readily available to interested persons.

2. Does the program involve information that is communicated verbally?
 - The chart outlines ten possible ways that information presented orally can be made accessible to people who are Deaf or who have hearing impairments.
 - Once again, not all of these formats are appropriate for all types of information and not all are usable by all persons with impaired hearing. For example, an individual who is culturally Deaf and uses American Sign Language (ASL) as a primary language would not benefit from an assistive listening device. Real time captioning is a more expensive accommodation that would not be appropriate for short meetings with "low level" information. However, it would be extremely beneficial for individuals with hearing loss who do not sign in the event of a meeting that contained technical information that was important to understand, or a long meeting that requires interaction and concentration.
 - Once again, every effort should be made to meet an individual's referred method of accommodation. If you cannot do that, you must ensure that whatever method you do use is effective for that individual.
3. Does the program inform persons with disabilities that communications aids and services are provided upon request?
 - It is not enough to only inform those who have identified themselves as requiring accommodations that you will do so. You must also inform the public at-large. In notifying the general public, you are making a clear statement about your willingness and ability to accommodate and include. You are also sending a very clear message to persons with disabilities that you welcome their participation and involvement.
4. How do you do so?
 - This question asks you to think about how you make the public aware of your willingness to provide accommodations and accessibility. Do you put a statement on all flyers and brochures as a matter of course? Do you make an announcement at meetings that you can make accommodations? Remember, you want this message to reach as many people as possible who come into contact with your program.
5. Does the program have a procedure for deciding which auxiliary aids and services to provide?
 - It may or may not be necessary to have a formal procedure in place for determining which aids services or accommodations will be provided. However, it is important to have an individual(s) identified who are responsible for making those decisions when the time comes.
6. Does the procedure provide for consideration of an individual's preferred aid or service?
 - Whenever possible, programs should strive to provide the aid or service that is requested by the individual. When that is not possible, negotiations regarding alternative services should commence with the individual with a disability present.
7. Does the procedure provide for a mechanism to determine whether an aid or service other than the one requested is equally effective?
 - This question asks programs to consider two points. One, is the aid or service equally effective? Is the individual with a disability able to fully participate in the program or activity? Two, has the program negotiated with the individual in such a way that effective aids and services that could be provided were provided?
8. Does the program communicate with the public over the phone?
 - This is the first step to evaluating the need for a TTY/TDD. Please refer to the "Reasonable Accommodations" packet for more information.
9. Are telephone conversations lengthy, complex, technical or personal?
 - This is the second step to evaluating the need for a TTY/TDD.

- If telephone conversations are frequently held with the public, or if conversations are often lengthy, complex, technical or highly personal, a TTY/TDD should be purchased in order to effectively communicate with TTY/TDD users.
10. Does the program have a TDD/TTY?
- A TDD is one means of communicating with persons who have hearing loss, speech impairments or who are Deaf. In all circumstances that a program is conducting specific outreach to these populations, a TTY/TDD should be purchased.
11. If, so, have staff been training on the appropriate use of a TDD?
- Like any other piece of equipment, a TDD will be of no value if staff members are not trained in its appropriate use. Use of a TDD is not the least bit complicated, and training should take no more than thirty minutes to an hour.
12. Is there a mechanism for re-training?
- Re-training on the use of a TDD (and other equipment) should be scheduled at regular intervals on an as-needed basis. Each program will need to determine those needs. For example, a program that frequently uses a TTY/TDD and has low staff turnover may only need to train once a year.
13. Are staff trained in the use of the relay system?
- Anyone on staff who uses the telephone should learn to use a relay system. Again, training should take no longer than a half-hour.
14. Are staff aware of the relay numbers?
- This is an evaluative question which can help programs measure how aware staff are of common auxiliary aids and services.
15. Does the program have a Web site?
16. Is the Web site captioned?
- The Internet is an effective way of communicating with a broad range of people in an efficient and effective manner. Most Web sites are graphics based, which means that they cannot be "read" by most text-to-voice software packages. Consequently, a text-based option needs to be provided for visually impaired persons.
17. Is there a mechanism for ensuring that people who are Deaf or hearing impaired are aware of activated fire or smoke alarms?
- Emergency warning signals should be equipped with flashing strobe lights. If the program operates in an area in which this is not available or in an outdoor location, other program participants or staff need to make sure that Deaf and hearing impaired members are aware of such emergency situations.
18. Is there an established emergency evacuation procedure that addresses the needs of persons with disabilities?
19. Have staff members been trained in this procedure?
20. Please describe this training.
- Emergency evacuation procedures need to be considered from two vantage points. One, for those who are regularly at a site: members, staff and recipients of service activities. Two, for those that may be visiting a site who may be present during an emergency. When reviewing your evacuation procedures, keep in mind that everyone needs to get out of the building safely and quickly.
 - Staff needs to be trained and emergency evacuation drills should be held at regular intervals. Programs should be able to describe procedures for emergency evacuation of all individuals.

Concluding Note:

Accessibility is not limited to access for people with mobility-impairments. Persons with hearing, visual and cognitive impairments are entitled to the same level of access as everyone else.