

Understanding the ADA Responsibilities for Local Government

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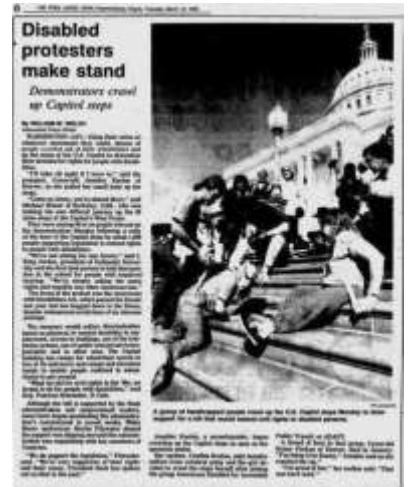
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History of Disability Rights Pre-Americans with Disabilities Act

- Section 504 of the 1973 Rehabilitation Act
 - Viewed people with disabilities as a minority group
 - Banned discrimination by recipients with federal funds
- Civil Rights Restoration Act
- Americans with Disabilities Act



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History of Disability Rights What Are the Key Laws?

Section 504
of the
Rehabilitation
Act of 1973
(1978)

Individuals
with
Disabilities
Education Act
(IDEA)
(1975)

Air Carrier
Access Act
(1986)

Fair Housing
Amendments
Act
(1988)

Americans
with
Disabilities
Act
(1990)



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Game Changer – Passage of the ADA



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How We Got Where We Are Now



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Definition of Disability under the ADA

- 1st Prong: Individual who has a physical or mental impairment that substantially limits them in one or more major life activities
 - Includes episodic conditions
 - Includes bodily functions
 - 2nd Prong: Individual who has a record of having such an impairment
 - Former alcoholic or drug addict
 - Cancer survivor
 - 3rd Prong: Individual who is regarded as having such an impairment
- An impairment does not have to be “permanent” to be covered

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Demographics of Disability

- 16% of people with disabilities use mobility devices (crutches, canes, wheelchairs, etc.)
 - Face greatest # of physical barriers in community
- 49% of people with disabilities have either vision or hearing impairment
- 33% of people with disabilities have major medical condition (Diabetes, Heart Disease, HIV, Seizure Disorder, etc.)



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What should I say or write?

Acknowledge the following:

- Each individual or group is different and has their own preferences.
- There is no one-size-fits all language for an individual, group, or population.
- Some groups or communities *may* prefer one term over another, e.g., blind and low vision, autism, deaf and hard-of-hearing.

Tips:

- Ask what the person or group prefers. Some people may have no preference at all.
- When addressing a known audience, ask! When addressing an unknown audience, we recommend using people first language.

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Title II & Municipal Obligations



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Title II of the ADA Municipal Obligations

- Five administrative requirements
 1. Designate a responsible employee
 - Someone with sufficient authority to make decisions and act
 - Often referred to as “ADA Coordinator”
 2. Grievance Procedure
 - Establish and publicize a procedure for addressing complaints

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Americans with Disabilities Act Grievance Procedure

This grievance procedure is established to meet the requirements of the ADA, it may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the (Name of Public Entity).

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number, email address of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request.

The complaint should be submitted as soon as possible, preferably within 60 calendar days of the alleged violation to:

(ADA Coordinator name and contact information).

Within 15 calendar days after receipt of the complaint, (name of ADA Coordinator) will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, (name of ADA Coordinator) will respond in writing, and where appropriate, in format that is accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the (Name of Public Entity) and offer options for substantive resolution of the complaint.

If the response by (name of ADA Coordinator) does not satisfactorily resolve the issue, the complainant may appeal the decision within 15 calendar days after receipt of the response to the (Head of Public Entity) or designee.

Within 15 calendar days after receipt of the appeal, the (Head of the Public Entity) or designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the (Head of the Public Entity) or designee will respond in writing, and, where appropriate, in a format that is accessible to the complainant, with a final resolution of the complaint.

Sample ADA Grievance Procedure

- May be incorporated into existing grievance procedure



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ADA/Accessibility Coordinator

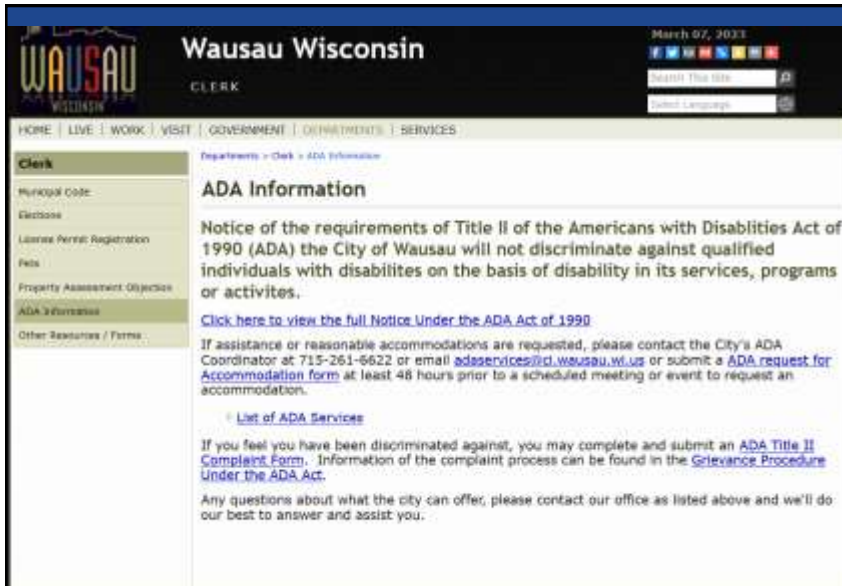


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Title II of the ADA Municipal Obligations (3)

- Five administrative requirements (con't)
 3. Notice to the Public
 - Public statement available across multiple platforms (print, auditory, website, etc.)
 4. Conduct a self-evaluation
 - An assessment of all programs and services to identify any barriers to participation by people with disabilities
 - Required by all entities, regardless of size

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Sample Notice
Published on
Website with
additional
information for
citizens

[City of Wausau, WI](#)

Sample Notice to the Public



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Title II of the ADA - Municipal Obligations (3)

- Five administrative requirements (con't)
 5. Develop a Transition Plan
 - Identifies barriers that impact access to programs and activities offered by a public entity
 - Only required for entities with 50 or more employees

*Originally required to be completed by July 26, 1992 and barriers to be removed by July 26, 1995

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Title II of the ADA - Potential Liabilities for Non-Compliance

- Possibility of harsher mandates from litigation
- Possibility of “bad press”
- Possibility of becoming a DOJ Project Civic Access “subject”

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Title II of the ADA- Potential Liabilities for Non-Compliance (2)

- Subject to private lawsuits and settlement agreements
 - More likelihood of advocates’ success if no evidence of “good faith effort”
 - Courts or settlement agreement can make you do more than would otherwise have been required
- Someone else could control and dictate the process, determine what financial resources you will need to allocate and dictate the schedule for compliance

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Department of Justice –
[Project Civic Access Program](#)

Over 200 settlement agreements with local governmental entities

- 3 in Wisconsin

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The Positive Side of Accessibility

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Why Accessibility is important

- Increasing number of individuals with disabilities in society
 - 1990 – 43 million
 - 2020 – 58 million
- Aging society
 - Average 15% population of the suburban cook county area is 65 yrs or older
- Move to “Virtual” environments
 - Opening opportunities to those who could not “travel” or be “in-person” for meetings, events, etc.
- Accessible features benefit those beyond the disability community
 - Mothers with strollers
 - Individuals using roller bags
 - Avoidance of “touching” and spreading disease

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Example Case Study

City of Milwaukee, WI



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Project Civic Access Milwaukee, WI Findings

Subject of a Project Civic Access Settlement Agreement in 2016

- Lack of a person with sufficient authority to act on accessibility issues
- Lack of an inventory of barriers facilities constructed prior to 1992
- Newly constructed buildings found non-compliant with 1991 Standards
- Lack of policies and procedures for effective communication
- Lack of inclusion of persons with disabilities in emergency planning and shelters

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Project Civic Access Milwaukee, WI Findings (2)

Subject of a Project Civic Access Settlement Agreement in 2016

- Numerous public rights of way lacking accessible curb cuts in commercial and residential areas
- Lack of policies for police departments to transport and detain individuals with disabilities
- Lack of accessible voting locations and policies/procedures for accessible voting

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Project Civic Access Milwaukee, WI Outcome

Outcome of Project Civic Access Settlement Agreement (5-year Monitoring):

- Named ADA Coordinator with sufficient authority to make decisions and address ADA related issues
 - Establishment of an interagency coordinating committee
- Inventory of all buildings owned/operated by the City with barriers identified and a plan for removal of the barriers within 3 years

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Project Civic Access Milwaukee, WI Outcome (2)

Outcome of Project Civic Access Settlement Agreement (5-year Monitoring):

- Inventory of all public rights of way with a plan for removal of barriers at intersections, etc. within 3 years
- Development of a city-wide policy for effective communication policy

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Project Civic Access Milwaukee, WI Outcome (3)

Outcome of Project Civic Access Settlement Agreement (5-year Monitoring):

- Inventory of all polling locations and establishment of policies for accessible voting within 3 years
- Revamp of the City's website to meet the W3C 2.0 Guidelines within 3 years

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Requirements of an ADA Self-Evaluation



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What is a Self-Evaluation?

ADA regulation: Evaluate programs, services, policies, and practices, and the effects of them, that do not or may not meet Title II requirements

- Describe areas examined, problems identified, modifications made
- Provide opportunity for interested persons to participate (submit comments)
- If the entity is larger than 50 employees, keep record of self-evaluation on file and available for public inspection for three years
- Make any necessary modifications [action plan]

1991 DOJ regulation: 28 CFR 35.105

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What Are Programs, Services or Activities?

Broadly defined:

For purposes of the self-evaluation and transition plan, a “program” is a service or activity with a single purpose. It is an activity undertaken by a department that affords benefits, information, opportunities or activities to one or more members of the public.



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Examples of Programs

- Library/parks and recreation/education
- Voting/elections
- Meetings, hearings, special events
- Police protection/Emergency
- Web based information and publications
- Social services
- Payment of fines, taxes, assessments
- Sidewalks/public rights of way
- Includes programs, services, and activities carried out by contractors or grantees on behalf of the local government

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Program Access Does Not Require

- Fundamental alteration in the nature of a service, program, or activity
- Undue financial and administrative burdens
- BUT:
 - Any undue burden decision must be made by the head of the public entity after considering **all** resources available and it must be in writing
 - The public entity must still take actions that will not result in fundamental alteration or undue burdens
- See also historic exceptions, 28 CFR 35.150(a)(2), 35.150(b)(3)

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Base Requirements of a Self-Evaluation

- Examine the entities programs, services, and activities including the use of information technology to identify any barriers for persons with disabilities;
- Evaluate how people with disabilities receive benefits and services and participate in programs and activities to identify any policies or practices that may be discriminatory;
- Develop a set of priority-driven recommendations to ensure that all programs, services, and activities are accessible to people with disabilities

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Starting the Self-Evaluation Process

- Identify the key personnel and conduct an interview with them and any other staff needed to obtain information.
- Seek out those:
 - Who know the programs and activities well
 - Who know the policies as well as the practices
 - Who can identify necessary documents

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Areas to Examine in a Self-Evaluation

- Participation requirements (initial and continuing)
- Tests/qualification requirements
- Participation policies and practices that may discriminate
- Existence of separate programs/services
- Effective communication

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Areas to Examine in a Self-Evaluation (2)

- Infrastructure (transportation, etc.)
- Emergency preparedness
- Use of outside entities and their compliance (vendors, contractors, grantees)
- Furniture, equipment, purchasing procedures
- Web based information/services (kiosks, apps, etc.)

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Program Example - Public Hearing

- Assume facts:
 - Meetings are held to conduct city business and communicate with residents of the city or recipients of a specific program
 - May be held in-person or remote
 - Some are held on regular basis, some are responsive to urgent situations (fiscal issues, emergency, etc.)
- Include each type of meeting that may be held in your assessment



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Program Example - Public Hearing (2)

- Determine:
 - Are all facilities where meetings are held accessible?
 - Is notice made to the public about how to request accommodations to participate?
 - Are all materials and announcements associated with the meeting accessible?
 - Do people with disabilities have an equal opportunity to participate?



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Program Example Sign Language Interpreters/Captioning

- Assume facts:
 - Municipal business is carried out in-person or by telephone/technology
 - Municipal events/meetings are open to the public
 - In-person
 - Virtual



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Program Example Sign Language Interpreters/Captioning (2)

- Determine:
 - How do we communicate to the public the need to request a sign language interpreter or real-time captioning in advance of the meeting, event, etc.?
 - Proactive - Statement on fliers/advertisements identifying what accommodations will be available at the meeting/event
 - Reactive - Statement about how to request an accommodation when meetings/appointments are scheduled
 - Establish timeframes for advance notification (reasonable notice to allow time to schedule/secure)

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Program Example Sign Language Interpreters/ Captioning (3)

- What is the process for securing these services?
 - Budget allocation
 - List of vendors/agreements in place (contracts,
 - Centralized or decentralized process for scheduling accommodations



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Program Example Sign Language Interpreters/ Captioning (4)

- What is the internal process for securing these services?
 - Confirmation that services will be available
 - Placement/seating
 - Set-up (i.e., electricity, lighting, etc.)
 - Orient meeting coordinators to use these services to ensure that they understand how to verify that the communication is effective



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Requirements of an ADA Transition Plan



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Base Requirements of a Transition Plan

- Conduct a review of all facilities where covered entities programs, services or activities are carried out
- Develop a list of the physical barriers that limit the accessibility of programs, activities, or services
- Identify the methods to remove the barriers and make the facilities accessible

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Base Requirements of a Transition Plan (2)

- Establishment of a schedule to get the work completed seeking input from the public regarding priorities
- Identification of the responsible official(s) for the plan's implementation
- Periodic review of progress made on the plan

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What Should Be included in a Transition Plan

- Identify all physical obstacles (**barriers**) in the facilities that limit program access
- Detail the **methods** that will be used to make the programs and/or facilities accessible
- **Schedule** the steps to be taken each year to achieve compliance
- **Name of official responsible** for implementation

[If authority over streets, roads, walkways, include schedule for curb ramps or other sloped areas where pedestrian walks cross curbs. 28 CFR 35.150(d)(3)]

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Transition Plan Coordination

Coordinate your physical facility access solutions with operations, maintenance, procurement, and various program providers to ensure consistent “program access” is in practice

- Don't assume that fixing physical barriers will fix all the problems. Programs have many aspects to them and must be coordinated with the Self-Evaluation Process

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Program Accessibility

- Does not necessarily require physical changes
- Examples of methods that provide program accessibility
 - Relocating services to an accessible part of same building, or another building that is accessible
 - Delivery of services at alternate sites
 - Modifying policies and procedures
 - Delivering services in alternate way
- Must give priority to most integrated setting appropriate

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Example Facility - City Hall

- Assume facts:
 - The building is open to the public on a regular basis
 - Residents can come to City Hall to carry out a variety of activities including paying bills, attending meetings, applying for services/benefits and meeting with leadership
 - A public parking lot serves the building
 - Restrooms are open to the public

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Example Facility - City Hall (2)

- Determine all areas where the public has access:
 - Identify any physical barriers that impede access to areas where the public is served
 - Evaluate against the 2010 ADA Standards for Accessibility and the Illinois Accessibility Code
 - Identify any physical barriers that may impede an employee with a disability (identify areas that may only be used by employees)

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Achieving Success

- **Success**

- Identifying policies, practices and procedures that make your programs, services and activities inaccessible to people with disabilities
- Reporting each one accurately and completely

- **Tips**

- Every entity has opportunities for improvement
- The purpose of the transition plan and self-evaluation process is not to point fingers, but to spot problems so they can be fixed
- If you identify areas of non-compliance, you have an opportunity to improve it

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Facility Accessibility

Elements to Consider During the Evaluation Process



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Notice of Facility Accessibility

All facilities where meetings and events open to the public are held should be readily accessible to individuals who require physical access. If a statement denoting such access is desired the following are examples of statements to be used:

- The facility is readily accessible to individuals with disabilities
- The facility is accessible in accordance with the ADA
- The meeting will be held in an accessible location



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Eligibility to Participate

- An individual with a disability cannot be refused participation simply because of a disability
 - Exception: safety risk
- Eligibility criteria cannot limit participation
 - Standards: physical/mental condition
 - Circumstances: e.g., inaccessible application process, requiring signature, drivers license, thumb print
- No surcharges or additional fees can be charged for modifications or accommodations because of disability

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Testing

- Are tests used to determine whether people are eligible to participate in the program?
- Is testing conducted as part of your program (e.g., training programs, licensing, etc.)?
- Licensing exams and testing must be offered in an accessible place and manner (including provision of auxiliary aids)
- Admission cannot be denied if a person meets the essential eligibility requirements

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Hearings, Meetings, Trainings, Etc Principals

- Meetings, hearings, events and other gatherings must be accessible to people with disabilities. This includes ensuring:
 - Physical accessibility
 - Appropriate auxiliary aids and services

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Hearings, Meetings, Trainings, Etc Principals (2)

- Applies to meetings and events held at:
 - Facilities owned or operated by the entity running the program
 - Other government-owned or operated facilities (schools, libraries, etc.)
 - Other locations (non-profits, churches, etc.)
- Plan ahead for compliance
- Give notice of the availability of auxiliary aids, accessibility features, and accommodations

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Modification of Policies, Practices and Procedures

- The entity must make reasonable modifications to policies, practices, and procedures to allow people with disabilities to participate, unless a fundamental alteration in the program would result.
- A "fundamental alteration" is a change that is so significant that it alters the essential nature of the goods, services, facilities, privileges, advantages, or accommodations offered.
- Includes modifications to application requirements and the program itself.



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Sample Service and Emotional Support Animal Policy

[Municipality name] is committed to providing a safe and secure environment for people who participate in our programs and activities. This policy is intended to comply generally with the Americans with Disabilities Act (ADA).

Service Animals. The ADA defines a service animal as a dog or miniature horse that has been individually trained to do work or perform tasks for an individual with a disability. The task(s) performed by the service animal must be directly related to the person's disability. We welcome people with service animals on government premises. Local government officials may ask individuals with service animals two questions, including: • 1) Is the animal required because of a disability? 2) What work or task has the animal been trained to perform?

Emotional Support Animals. An emotional support animal (also known as a comfort animal) provides reassurance just by being with a person. Dogs, cats, birds, hamsters, and many other species can serve as emotional support animals. However, they do not qualify as "service animals" under the ADA. Therefore, we do not allow emotional support animals on our premises.

Animal Handler's Responsibilities Individuals who bring a service animal onto our premises are expected to: 1) Keep the animal harnessed, leashed, or tethered, unless these devices interfere with an animal's work or an owner's disability prevents them from using these devices. 2) Control the animal through voice, signal, or other effective controls, if the animal cannot be harnessed, leashed, or tethered. [Municipality name] is not responsible to provide care, food, or a special location for the service animal to relieve itself. We reserve the right to remove a service animal from the premises if it: 1) Is out of control and the handler does not take effective action to control it. 2) Poses a direct threat to the health or safety of others. 3) Is not housebroken.

If a service animal must be removed from the premises, absent other circumstances, the owner may re-enter the premises and attend activities without the service animal.



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Snow Removal Policies and Procedures

ADA requires the "Maintenance of Accessible Features" which includes clearing of sidewalks, curb ramps, parking lots/spaces, etc., to ensure individuals with disabilities have access

- Ordinances addressing snow removal in residential areas
- Ordinances addressing snow removal in business districts
- Policies for prioritizing municipal snow removal on public sidewalks, at all public buildings, crosswalks, intersections, bus stops, etc.



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Specialized Services Principles

- Programs and services must be provided in the most inclusive setting appropriate to the needs of an individual
- Separate programs or different measures can be provided only if necessary to ensure equal opportunity or equally effective benefits and services
- Even when separate programs are permitted, an individual with a disability can choose to participate in the “regular” program
- Cannot use separate programs as a substitute for:
 - Providing auxiliary aids and services
 - Accessible locations
 - Policy modifications

SEPARATE
≠
EQUAL

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Specialized Services Questions to be Asked

- What population may participate in the program?
- Must standards related to disability be met?
- Why a specialized program?
- Who determined that specialized program was appropriate?
- Is there an equivalent program open to people without disabilities?

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Examples of Programmatic Access



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Effective In-person Communication Overview

- Members of the public can meet with municipal staff or obtain information by appointment or as a “walk-in”.



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Effective In-person Communication Highlights

- Accessibility of waiting area
- Chairs for visitors that have difficulty standing
- Notification of visitor's "turn"
- Assistance to fill out forms
- Use of auxiliary aids to communicate with people who are deaf or hard of hearing or who are blind/low vision

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Effective Written Communication Highlights

- Policy for providing materials in alternate formats
 - Advance notice requirement
 - Notification to public
- Bulletin boards, written displays, exhibits or brochure displays



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Auxiliary Aids and Services Highlights

- Sign language interpreters, real-time captioners, etc.
- Policies for providing auxiliary aids and services
 - Advance request, friends/family, no surcharge
- When/what would be a circumstance for not providing
- Licensed – State of Illinois requires “licensed” sign language interpreters
- Qualifications
 - Specialized language (e.g. legal, medical)
- Vendors
 - Negotiated rates/timeframes, etc.

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Notice requesting accommodations for meetings/events, etc.

SAMPLE LANGUAGE:

- Individuals who need accommodations to participate in the meeting should contact <name or title> at 222-2222 or email <insert address> no later than <insert date*>
- Accommodation requests should be directed to <insert name or title> at 222-2222 or email <insert address> no later than <insert date*>.
- Requests for a sign language interpreter, real-time captioning or materials in alternative format should be made no later than <insert date*> to <insert name or title> at 222-2222 or by email <insert address>.
- Individuals requiring assistance to facilitate their full participation in the meeting should call 222-2222 or email <insert address> no later than <insert date*>.

*Additional language may be added to state that requests for accommodations made after the advertised date will be honored to the maximum extent feasible.



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Effective Telephone Communication Highlights

- Automated phone system
- Telephone communication with public
 - TTY
 - Video Phone
 - Text/SMS option
- Telecommunication relay service
- Designated telephones for public in facilities
- Public use of front desk or staff phones



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Influence of Assistive Technology

- Many individuals utilize assistive technology to access text of documents as well as internet sites
 - Screen readers
 - Magnifiers
 - Text to speech/speech to text software



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Effective Electronic Communication Principles

- As a means of communication with members of the public, information that is communicated through electronic media must be accessible to people with disabilities
- Equipment that is used to communicate information or provide an interactive component with the public must be accessible to people with disabilities



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Other Media Principles

- Information conveyed to the public through visual media (video, displays, television, etc.) must be accessible to people with disabilities
- Information conveyed to the public aurally (radio, recordings, etc.) must be conveyed in a manner that is accessible to people with disabilities



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Internet Based Content Principles

- As a means of communication with members of the public, websites and internet-based information must be accessible to people with disabilities.
 - World Wide Web Consortium (W3C Web Accessibility Initiative) 2.0 or higher
 - Section 508 Accessibility Standards (Federal Government)
- Information, products, registration and other communication must be available through other means



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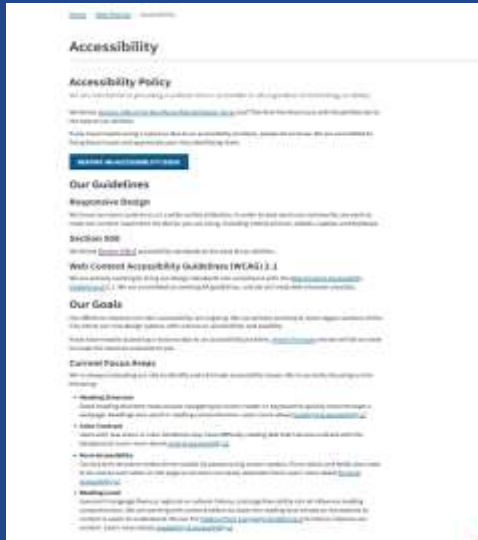
Internet Based Content Highlights

- Brochures, flyers or other documents
- Sales on website
- Communication with public
- Multi-media
- Calendars
- Maps
- Online forms to sign up for programs or report problems



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Sample Web Site Accessibility Statement



Sample - City of Madison, WI

[View online](#)



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How do I know if my Website is Accessible?

- There are many tools/consultants that will assist with evaluating your website, apps, etc. for accessibility.
- To get a “quick” picture of just how accessible your municipality website is you can use a free tool known as [WAVE](#)
 - Provides information on the major errors on each page of your website
 - Share this information with your IT staff/Web Developer
 - Provides detailed information on the “error” as well as how to “fix” it



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Public Transportation Principles

- When transportation is provided or used as part of your program, including at one of your events, accessible equivalent transportation should be provided.
- Applies to transportation as a service, e.g.:
 - To medical appointments
 - To shopping



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Public Transportation Highlights

- Is transportation service the purpose of the program?
- Is transportation provided to allow people to participate in the program?
- Designated vehicles to provide transportation
- Owner, contractor
- Accessible features
- Driver training



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Emergency Procedures Highlights

Should include the following elements:

- Visual and auditory alarms present/working order
- Provision/use of Evacuation chairs in multi-story buildings
- Emergency plans available when meetings or events are held various types of facilities (outdoor, etc.)
- Establish and promote hot lines and emergency phone lines/text notifications
- Consider establishment of a registry of participants with disabilities (e.g. City of Chicago, [St. Clair County, IL](#))



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Middleton, WI Voluntary Registry



Middleton Autism and Special Needs Registry

The Middleton Autism & Special Needs registry is a voluntary registry setup to collect information about community members with special needs in order to expedite help if Middleton first responders are called to assist with a crisis.

It's been found that having prior knowledge will create a quicker and safer response. First responders who are aware of special needs can respectfully and appropriately interact with the individual when they are in contact with them.

The goal is to increase mutual awareness, understanding and communication between first responders and the special needs community members of Middleton.

Information provided will only be accessed by Middleton police personnel used in emergency situations to expedite help for your loved one.

[View Online](#)



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Emergency Procedures Highlights (2)

Should include the following elements (con't):

- Identification of accessible features within City provided/sponsored/funded shelters (warming centers, sleeping/overnight facilities, food distribution programs, etc.)
- Accessible transportation if transportation is provided
- Plans or procedures are available in writing/accessible format
- Ensure people with disabilities involved in planning
- Provisions of plans communicated to the public and relevant partner agencies/organizations



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Emergency Procedures Communication

- Robo-calls
- Voluntary registry
- Email blasts
- Text messages
- Local T.V. media
- Local radio
- Website messages

City of Chicago
Voluntary Emergency Assistance Registry for
People with Disabilities or Special Needs



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Outsourced Services Principles

- A program is liable for ensuring that any external contractors used to provide goods and services meet the requirements for ensuring accessibility
- Contract language should include the requirement to ensure that all goods and services provided are accessible to people with disabilities



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Outsourced Services Highlights

- Are outside entities required to ensure they will provide people with disabilities equal access (in contract)?
- Eligibility criteria
- Accessible facilities
- Auxiliary aids and services
- Alternate formats



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What About Things Not Covered in the Regulations/Standards?

Example:

Free standing equipment such as vending machines, furniture, etc., are subject to provisions other than the Standards:

- Program access
- Full and equal enjoyment
- Opportunity to participate and benefit from the programs and services provided



Seek Public Input

- When
 - At beginning
 - As to tentative findings
 - As to recommendations
- How
 - Public hearings
 - Meetings with constituencies
 - Online surveys/comments



Seek Public Input (2)

- Who
 - Advisory committees
 - Advocacy groups
 - Individuals



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Title II Administrative Requirements

Available Resources



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Title II Administrative Requirements Resource Examples

US Department of Justice

- [Title II Tool Kit](#)
- [Title II Technical Assistance Manual](#)
- [Project Civic Access Enforcement Program](#)
- [Guide for Small Towns](#)

ADA National Network

- [Title II Action Guide](#)
- [Title II Tutorial | \(Web based course\)](#)

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Questions?

Speaker Contact Information:

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