



## City of Attleboro, Massachusetts

### PART B – Evaluation of Non-discriminatory Policies & Practices in Programs, Services & Activities

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Prepared by the



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## **Part B – Evaluation of Non-discriminatory Policies & Practices in Programs, Services & Activities**

### **Introduction**

In an effort to provide and maintain compliance with the American with Disabilities Act (ADA), the City of Attleboro contracted with the Institute for Human Centered Design (IHCD) to undertake a comprehensive assessment of its policies, practices and procedures as well as its facilities to determine compliance with the requirements of the Americans with Disabilities Act (ADA). The review and recommendations provided in this assessment also go beyond strict compliance assessment to recommend enhancements to current conditions that would result in a more usable, inclusive and welcoming environment for members of the Attleboro community.

Information about corrective action will include recommendations based on Title II of the ADA as well as recommended “*best practices*” for each aspect that requires action.

The assessment included non-discrimination in policies, practices and procedures for all of the City’s programs, services and activities including those related to effective communication and policies, practices and procedures relative to employment.

Corrective action is needed in policies and procedures to create written policies that would ensure the City of Attleboro’s compliance with applicable laws. In addition, the City will be making a commitment to a more accessible website by conducting a web review. Choosing to make the website completely accessible would make it available to site visitors who use assistive technology such as screen readers as well as to website visitors with a mix of other functional limitations. The website is also a valuable asset in communicating the City’s commitment to equal opportunity for people with disabilities through a clear statement and contact information for the ADA Coordinator. It can also provide a helpful opportunity to share information about accessible routes to reaching the City’s programs and activities including meetings as well as requesting effective communication or modification of policies.

This report summarizes IHCD’s findings of ADA Title II compliance. The information pertinent to this assessment was obtained by an on-line ADA questionnaire developed by the Institute for Human Centered Design (IHCD) and submitted by eighteen (18) departments from the City of Attleboro, from the City’s website, and from materials forwarded to IHCD by the City. A questionnaire was also sent to the Commission on Disabilities and returned by three (3) Commission members. This mix of sources constitutes the basis for this compliance assessment report. It is clear that the City understands its

obligations under Title II of the ADA but additional steps are necessary to ensure that people with disabilities enjoy the same opportunities to participate in its programs, services and activities as Attleboro residents without disabilities.

## Analysis

Title II of the ADA prohibits discrimination on the basis of disability. Specifically, Title II requires that:

*No qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity (28 CFR Part 35.130 (a)).*

This report is divided into sections where these requirements apply. Each section includes the applicable citation from Title II of the ADA; IHCD's summary of findings after reviewing answers from the ADA questionnaire and information from the website and other previously mentioned sources. It also includes IHCD's recommendations for the City of Attleboro to implement.

### 1 - Designation of Responsible Employee

Title II of the ADA makes clear that a public entity must designate a responsible employee and adopt grievance processes.

*A public entity that employs 50 or more persons shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to it alleging its noncompliance with this part or alleging any actions that would be prohibited by this part. The public entity shall make available to all interested individuals the name, office address, and telephone number of the employee or employees designated pursuant to this paragraph. (28 CFR Part 35.107 (a)).*

Title II provides little specific guidance for implementing this requirement but the primary role of the designated employee, also called the ADA Coordinator, is making sure that the City is in compliance with the ADA.

### Finding

The City of Attleboro has met its obligation to designate a responsible employee to serve as the ADA Coordinator. Building Commissioner, William McDonough is the City's current ADA Coordinator, which

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includes all obligations associated with an ADA Coordinator. **Note:** Mr. McDonough’s listing within the City’s staff directory on the municipality’s website does not bear the ADA Coordinator designation.

### Recommendations

The City should consider clarifying for its entire community and City employees the name and scope of responsibilities of the ADA Coordinator. Highlighting this information will improve compliance and make for more efficient operations with respect to the needs of members of the public with disabilities. Mr. McDonough’s name and role as ADA Coordinator should be made clear on the City’s website, employee information, and notifications.

Furthermore, clarification regarding the ADA Coordinator will:

- Make it easier for the City to be proactive in meeting the needs of members of the public with disabilities;
- Help the City to develop and articulate a clear vision and mission with regard to members of the public with disabilities;
- Reduce confusion and improve the City’s day-to-day operations with respect to members of the public with disabilities;
- Permit employees to respond more quickly to needs as they arise because they have a primary contact for addressing their needs;
- Build in-house expertise and capacity;
- Prevent confusion and help ensure that candidates for employment, employees and the public have a clear understanding of their responsibilities and rights under the ADA.

## 2 – Grievance Procedures

Title II of the ADA requires a public entity to adopt an adequate grievance process.

*A public entity that employs 50 or more persons shall adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited by this part. (28 CFR Part 35.107 (b))*

### Findings

It is not clear that a Grievance Procedure with an associated appeals process exists. The City’s website has a portal to “Submit a Request” that leads to a page for the “Citizen Request Tracker;” however, there is no clear instruction or link to begin a complaint or request. Council for Human Rights has a form to report incidents; yet again, it is not clear that this would be used to report disability related issues. Furthermore, it is not clear where an employee may file a grievance. It is not clear if staff in all departments is aware of their ADA obligation and the process for meeting the requirements for grievance procedures. Regarding grievance procedures, several survey responses indicate they defer issues to another department; e.g. schools, Mayor’s Office, Personnel Department. Furthermore, other department responses include: “We have no such procedures,” “Not applicable,” and “None are in place.”

### Recommendations

The City should take steps to incorporate a grievance process regarding members of the public.

IHCD recommends:

- Provide an “ADA Compliance” link on the City’s website home page directly to the grievance procedure form and state the commitment to provide copies in accessible formats upon request.
- The grievance procedure for members of the public should provide a process that allows for appeal, it should also include reference to reasonable time frames for review and resolution of the grievance.
- Ensure good record keeping for all complaints submitted and documentation for steps taken towards resolution.
- Distribute the grievance procedure to all department heads, and post copies of it in noticeable locations in each of the City’s public buildings.

- Ensure City employees and the public are aware of the grievance procedure process and can provide information to members of the public about the process when appropriate.
- Ensure the complete contact information for the ADA Coordinator including name, address, email and phone number is included in the grievance procedure.

[See Attachment #1 at the end of the document for a sample of a Grievance Procedure.]

### **3 – Notice**

Title II of the ADA requires that public entities notify participants of its non-discrimination policies:

*A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part. (28 CFR Part 35.106)*

#### Findings

From the responses submitted by staff it appears that the City of Attleboro does not have a uniform policy regarding the posting of ADA Non-Discrimination Notices for members of the public. Responses from City departments include: “I do not know”, “No”, “n/a” and “Currently not posted.” A small number of survey respondents believe there are notices posted “At the entrance of the Zoo,” “At the main entrance to the facility,” and “Under EEOC notice in the break room.” It is not clear if notices on the Family Medical Leave Act or Occupational Safety and Health Administration information may be misinterpreted for ADA notification.

The municipality’s website does provide an accessibility notice statement related to digital accessibility. However, this is not an ADA Non-Discrimination Notice that covers all City programs, services, and activities beyond those provided in an online format.

#### Recommendations

The City should adopt a Notice of Non-Discrimination policy to comply with ADA Title II that states that public entities shall take initial steps to notify program/service participants, beneficiaries and employees of its obligations:

- Publish the Notice in all the materials distributed by the City; post the Notice on the City’s website home page and post copies in public locations in the City’s buildings.

- Distribute the Notice to all department heads. Copies should also be provided to any person upon request.
- Include the ADA Coordinator’s name, address, telephone number and email address on materials and publications that contain general information disseminated to staff and members of the public.
- [See attachment #2 at the end of this document for samples of an ADA Non-Discrimination Notice.]

#### **4 - Reasonable Modification of Policies, Practices and Procedures**

Title II of the ADA requires state and local governments to modify its policies when necessary to avoid discrimination:

*A public entity shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity. (28 CFR Part 32.130 (b)(7))*

#### Findings

A public entity must make reasonable modifications in policies, practices, or procedures unless the modification would fundamentally alter the nature of the service, program, or activity. From all of the responses submitted by staff, there is no evidence that the City was unable to provide a reasonable modification. However, there is also no evidence on the City’s website that a reasonable modification policy exists.

#### Recommendations

IHCD recommends:

- The City should develop written policies and procedures to ensure compliance with the ADA.
- Attleboro should ensure that City employees can provide information to members of the public about the process of requesting reasonable modification of policies when appropriate.
- Attleboro should also ensure that the form for requesting reasonable modifications of policies is on the City’s website, and state the commitment to provide copies in accessible formats upon request.

- Include the ADA Coordinator's name, address, telephone number and email address on materials and publications that contain general information disseminated to staff and members of the public.
- IHCD, through its New England ADA Center, can provide a training for the City of Attleboro on the City's ADA obligations, including the administrative requirements and providing reasonable modifications that would be appropriate for department heads and public-facing City staff in order to build confidence about rights and responsibilities and building capacity within the City to comply with this important element of the ADA.

## 5 – Eligibility Criteria

A Title II entity may not impose eligibility criteria that may prevent a person with a disability from participating in its programs, services or activities:

*A public entity shall not impose or apply eligibility criteria that screen out or tend to screen out an individual with a disability or any class of individuals with disabilities from fully and equally enjoying any service, program, or activity, unless such criteria can be shown to be necessary for the provision of the service, program, or activity being offered. (28 CFR Part 35.130 (8)).*

This requires that ADA Title II entities may not impose eligibility criteria that either screen out or tend to screen out persons with disabilities, unless it can show that such requirements are necessary for the provision of the service, program or activity.

### Findings

Some departments responded to the online questionnaire indicating that they have eligibility criteria such as age, veteran status, honorable discharge and education standards. These requirements are necessary for the provision of the service, program or activity, and permitted under the ADA.

## 6 – Employment and Reasonable Accommodation

Title II of the ADA prohibits discrimination on employment on the basis of disability:

*No qualified individual with a disability shall, on the basis of disability, be subjected to discrimination in employment under any service, program, or activity conducted by a public entity. (28 CFR Part 35.140 (a)).*

Under the ADA, an employer has to provide reasonable accommodations to qualified individuals with disabilities who are employees or applicants for employment, unless to do so would cause undue hardship (significant difficulty or expense). A reasonable accommodation may include modifying work schedules, job restructuring, and making facilities used by employees readily accessible to employees with a disability.

### Findings

From the responses to the ADA questionnaire, over half of the responses indicate that their department has a reasonable accommodation policy in place. In contrast, several respondents do not believe that their department stated a reasonable accommodation policy. Nevertheless, there is no evidence that the City has failed to provide reasonable accommodations to its employees.

### Recommendations

- Ensure that materials that contain general information disseminated to employees include information on the requirements of reasonable accommodation under the ADA.
- On the Human Resources website page clearly provide information on who to contact regarding reasonable accommodation requests.
- IHCD recommends that City of Attleboro employees familiarize themselves with the excellent free national resource from the Job Accommodation Network (JAN) (<https://askjan.org>).

[See attachment #3 at the end of the document]

## **7 – Effective Communication through Auxiliary Aids and Services**

Title II entities are required to provide appropriate auxiliary aids and services to ensure “effective communication” with people with disabilities. This obligation applies to all members of the public with disabilities including job applicants, program participants and people who are seeking information about the City’s programs, services or activities. Specifically, Title II requires that:

*A public entity shall take appropriate steps to ensure that communications with applicants, participants, members of the public, and companions with disabilities are as effective as communications with others. (28 CFR Part 35.160 (a)).*

Auxiliary aids and services are devices or services that enable effective communication for people who have vision, hearing, or speech disabilities (communication disabilities), use different ways to

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communicate. The type of auxiliary aid or service necessary to ensure effective communication will vary in accordance with the length and complexity of the communication involved (e.g., a query at a service counter in the City Offices, a meeting, a job description).

The obligation to communicate effectively with people who have disabilities applies to the presentation and exchange of information in all forms including sound, print, graphics and voice.

Furthermore, this requirement may include but is not limited to providing sign language interpreters, telephone handset amplifiers, Telecommunication Devices for Deaf persons (TDD's), note takers, written materials for persons who are deaf or hard of hearing or transcripts, braille, digital or audio information for persons who are blind or have difficulty seeing.

The decision about what auxiliary aid is appropriate should evolve from a consultation between the ADA Title II entity (City of Attleboro) and individuals with disabilities wherever possible to ensure effective communication. In many cases, more than one type of auxiliary aid or service may make effective communication possible. While consultation is always strongly encouraged to achieve effective communication, the City of Attleboro and all public entities are required to give primary consideration to the requests of individuals with disabilities. The effective communication obligation does not require the City to take any action that would result in a fundamental alteration in the nature of its services, programs or activities or that would impose an undue financial and administrative burden.

### Findings

From the questionnaires received, there is no indication that an accommodation or modification was denied to a person with a disability. One department “provides various types of communication to ensure people with disabilities receive equal and effective communication.” However, several other departments provide service ad hoc or are not clear on a procedure to secure auxiliary aids and services for people who are visually impaired or blind.

The municipality’s website provides a field for users to determine “How do I...:” access, apply for, contact, find, and pay for several services, programs, and activities. Yet none lead users to a link to secure effective communication through auxiliary aids and services (CART, ASL, materials in braille, etc.).

It is not clear if face-to-face communication with individuals with disabilities is equally effective as communication with people without disabilities in all City departments, or if information available in

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print format is currently consistently available in accessible electronic or hard-copy formats such as large-font, or on Attleboro’s website.

### Recommendations

The City should consider developing and publicizing clear processes for members of the public and employees to request auxiliary aids and services:

- The City of Attleboro would benefit from a written policy on Effective Communication so staff across all departments has an understanding of their responsibility and clarity about what to do.
- Distribute Effective Communication notice that indicates how to request an accommodation for a public meeting to all department heads; publish it in a local newspaper of general circulation serving the City; in all materials regarding the City’s programs, services or activities and on the City’s website home page. Copies should also be posted in prominent locations in the City’s public buildings.
- Staff should clearly understand the responsibility to provide auxiliary aids and services where necessary to afford qualified individuals with disabilities, including applicants, participants, companions, and members of the public, an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity of a public entity. (28 CFR Part 35.153 (b)). Staff should also clearly understand the process for requesting auxiliary aids and services when needed.
- Staff needs to understand the scheduling time necessary in requesting a sign language interpreter or a Computer-Assisted Real Time Interpreter (CART) through the Commission for the Deaf and Hard of Hearing or other provider.
- Interpreters must be qualified.

**Note:** A “qualified” interpreter means someone who is able to interpret effectively, accurately, and impartially, both receptively (i.e., understanding what the person with the disability is saying) and expressively (i.e., having the skill needed to convey information back to that person) using any necessary specialized vocabulary.

- Also, it is the Department of Justice position that police stations provide sign language interpreters in a timely manner when requested. Ensure the Police Department provides sign language interpreters in a timely manner as follows:

- Non-scheduled Interpreter Requests: A “non-scheduled interpreter request” means a request for an interpreter made by an inmate, visitor, companion, or other member of the public, who is deaf or hard of hearing with less than two (2) hours advanced notice. For non-scheduled interpreter requests, the interpreter shall be provided no more than two (2) hours from the time of the request for an interpreter if the service is provided through a contract interpreting service or a staff interpreter who is located off-site or 30 minutes from the request for an interpreter if the service is provided through a Video Remote Interpreting service.
- Scheduled Interpreter Requests: A “scheduled interpreter request” is a request for an interpreter made two (2) or more hours before the services of the interpreter are required. For scheduled interpreter requests, the Police Department will make a qualified interpreter available at the time of the scheduled appointment. If an interpreter fails to arrive for the scheduled appointment, upon notice that the interpreter failed to arrive, the Police Department will immediately use reasonable efforts to call an interpreter service for another qualified interpreter or provide Video Remote Interpreting service.
- Members of the public also need to have a clear understanding of the process for requesting auxiliary aids and services and the time period in which a request must be made if it involves ASL interpreters, CART, or special equipment such as assistive listening devices that may need to be rented. This information, which is provided in the Commission on Disabilities Special Accommodating Statement, should be included in the general information for the public as well as on the City’s website.
- In determining what type of auxiliary aid or service is necessary to comply with Title II of the ADA, the City should give primary consideration to the expressed preference for a particular auxiliary aid or service by deaf and hard of hearing individuals. Primary consideration means that the City of Attleboro will inquire as to the choice of auxiliary aid or service of the person with a disability and will honor the expressed choice unless the City can demonstrate that another equally effective means of communicating is available.
- Ideally, the City should develop a system for training staff to meet these responsibilities especially knowing the processes for securing braille, making large print, other types of accessible formats, understanding how to request interpreters or CART and the length of time needed prior to an event. It is also important that staff know how to use and maintain the

assistive listening systems and other special devices to assist people with disabilities to enjoy effective communication.

- IHCD, through its New England ADA Center, can provide a training for the City of Attleboro on effective communication that would be appropriate for department heads and public-facing City staff in order to build confidence about rights and responsibilities and building capacity within the City to comply with this important element of the ADA.

**Sample of Effective Communication request:**

“The City of Attleboro is committed to the full participation of people with disabilities. Any person with a disability who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in the City’s programs, services, activities and committee meetings, should contact the office of the ADA Coordinator (Name, Address, Phone number and Email) as soon as possible but no later than 48 hours\* before the scheduled event.” (\*If the City needs 2 or 3 weeks or longer to ensure an interpreter, then it must be clearly stated).

- Ensure that information and resources at each department interacting with the public are available in accessible format. That could be done by having a large print sign at each department and on each department’s portion of the website stating:

“All of our materials are available, upon request, in accessible format such as audio, large print or braille.”

- Ensure that staff interacting with the public is fully trained on how to respond to TTY and relay calls for telephone communications with people who are deaf, have difficulty hearing or have speech disabilities.

Even though there is a fundamentally changed pattern among people who are deaf or hard-of-hearing in relation to communication technology, TTY remains a compliance requirement. Because of these advances in communication technology, some people who are deaf and people with speech disabilities no longer have TTYs in their homes and rely instead on instant messaging, text messaging, email, or the video communication features of computers.

- Ensure that the City’s website and other web-based services are accessible to people with disabilities. It is the Department of Justice position that when services are provided on a website, those services too must be made accessible. (see

[www.ada.gov/mclennan\\_pca/mclennan\\_sa.html](http://www.ada.gov/mclennan_pca/mclennan_sa.html) *Section K on Web Based Services and Programs*)

- To address these Information and Communication Technology (ICT) issues, Attleboro should commit to fixes and maintenance of the website accessibility. All staff should undergo training on accessibility best practices for posting web content and creating accessible documents. All third-party software should be properly vetted for compliance with WCAG 2.0 AA and section 508 of the Rehabilitation Act.
- Ensure that all the fillable forms on the City's website are accessible to people with disabilities.
- IHCD recommends providing web forms or accessible fillable PDF's for all the forms available on the City's website.
- Include captioning for any videos available on the City's website.
- Include alternative text descriptions for all photographs and images available on the City's website.
- Include the link for the New England ADA Center ([www.NewEnglandADA.org](http://www.NewEnglandADA.org)) on the Disability Commission's webpage under 'Helpful Links'.
- Additionally, under Title II of the ADA, emergency programs, services and activities must be accessible to people with disabilities. Ensure that the City takes the necessary steps to effectively communicate with people with disabilities and make the emergency plan available on the City's website and update the emergency procedure as often as is necessary.

## **8 – Emergency Preparedness, Evacuation Plans, and Emergency Shelters**

While a review of the City of Attleboro's emergency preparedness, evacuation plans and emergency shelters was not part of this RFP, as evidenced by recent U.S. Department of Justice's (DOJ) Project Civic Access settlement agreements, DOJ's views on emergency preparedness, shelters and evacuation plans are critical components of a City's responsibilities related to accessibility.

### Recommendations

- Visibly post up-to-date floor plans for all buildings;
- Post information about evacuating people unable to use stairs;
- Develop evacuation plans for each facility;
- As plans are developed or revised, adopt policies to ensure that community evacuation plans enable people with disabilities, including those who have mobility, vision, hearing, or cognitive disabilities, mental illness, or other functional limitations, to safely self-evacuate or to be evacuated by others. Until all emergency shelters are accessible with parking, exterior routes,

entrances, interior routes to the shelter area, and accessible toilet rooms serving the shelter area, the City should identify and widely publicize to the public, including persons with disabilities and the organizations that serve them, the locations of the most accessible emergency shelters.

For more information see:

Making Community Emergency Preparedness and Response Programs Accessible to People with Disabilities - <http://www.ada.gov/emergencyprepguide.htm>

ADA Tool kit: Emergency Management - <http://www.ada.gov/pcatoolkit/chap7emergencymgmt.pdf>

*FEMA Guidance on Planning for Integration of Functional Needs Support Services in General Population Shelters* - [http://www.fema.gov/pdf/about/odc/fnss\\_guidance.pdf](http://www.fema.gov/pdf/about/odc/fnss_guidance.pdf)

Additionally, we recommend considering engaging the National Fire Protection Association (NFPA) for evacuation training and guidance, providing and load verifying backup power source for elevator to address Functional Needs Support Services (FNSS) emergency shelter needs, installing one or more accessible showers to meet emergency shelter needs and providing backup power for charging batteries for wheelchairs or breathing equipment and refrigeration for medication to meet emergency shelter needs.

Based on this review, IHCD recommends the following:

- Ensure that the input and needs of students, staff and visitors with disabilities are included in all phases of emergency management planning. When developed, involve the participation of members of the municipal Disability Commission.
- Ensure that communication with students with disabilities is as effective as communication with any student.
- Make the evacuation procedure available on the public school website in an accessible format and update the evacuation procedure as often as necessary.

## Reference List

ADA Action Guide for State and Local Governments:

- [www.adaactionguide.org](http://www.adaactionguide.org)

Department of Justice:

- Americans with Disabilities Act Title II Regulations:  
[http://www.ada.gov/regs2010/titleII\\_2010/titleII\\_2010\\_regulations.htm](http://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm)
- Making Community Emergency Preparedness and Response Programs Accessible to People with Disabilities - <http://www.ada.gov/emergencyprepguide.htm>

Federal Emergency Management Agency:

- FEMA Guidance on Planning for Integration of Functional Needs Support Services in General Population Shelters - [http://www.fema.gov/pdf/about/odc/fnss\\_guidance.pdf](http://www.fema.gov/pdf/about/odc/fnss_guidance.pdf)
- Job Accommodation Network:
- <http://www.askjan.org>

New England ADA Center:

- <https://www.newenglandada.org>

## **Attachment #1: Sample Grievance Procedures**

### **Long**

#### 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.

**Short**

Americans with Disabilities Act Grievance Procedure

Complaints concerning discrimination on the basis of disability by the (Name of Public Entity) may be sent to (ADA Coordinator name and contact information). (Name of ADA Coordinator) will contact the complaint within 15 calendar days after receipt of the complaint to discuss the complaint and will respond in writing within 15 days of the discussion.

## **Attachment #2: Sample ADA Notice**

### **Long**

Americans with Disabilities Act

(Name of Public Entity) does not discriminate on the basis of disability in its services, programs, or activities.

Employment: (Name of Public Entity) does not discriminate on the basis of disability in its hiring or employment practices and complies with the ADA title I employment regulations.

Effective Communication: (Name of Public Entity) will, upon request, provide auxiliary aids and services leading to effective communication for people with disabilities, including qualified sign language interpreters, assistive listening devices, documents in Braille, and other ways of making communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: (Name of Public Entity) will make reasonable modifications to policies and procedures to ensure that people with disabilities have an equal opportunity to enjoy programs, services, and activities. For example, people with service animals are welcomed in (Name of Public Entity) offices, even where pets and other animals are prohibited.

Requests: To request an auxiliary aid or service for effective communication, or a modification of policies or procedures contact (ADA Coordinator name and contact information) as soon as possible, preferably XX days before the activity or event.

Complaints: Send complaints to (ADA Coordinator name and contact information).

### **Short**

Americans with Disabilities Act

The (Name of Public Entity) does not discriminate on the basis of disability in its programs, services, activities and employment practices.

If you need auxiliary aids and services for effective communication (such as a sign language interpreter, an assistive listening device or print material in digital format) or reasonable modification to programs, services or activities contact the ADA Coordinator as soon as possible, preferably XX days before the activity or event.

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A grievance procedure is available to resolve complaints. Upon request, this notice is available in alternative formats such as large print or braille. (ADA Coordinator name and contact information)

### **Attachment #3: Sample ADA Employment Policy**

The NAME of TOWN/CITY is committed to equal opportunity in all aspects of employment for qualified individuals with disabilities. In accordance with the Americans with Disabilities Act (ADA) and other federal and state law, it is the policy of the NAME of TOWN/CITY to provide necessary reasonable accommodation in employment to any qualified individual with a disability unless the accommodation would impose an undue hardship on the operation of the NAME of TOWN/CITY or would change the essential functions of the position.