



**Association of Public-Safety
Communications Officials, International**

***Americans with Disabilities Act (ADA)
Training Standard for Communications
Managers/Supervisors***

**Adopted
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Introduction

The Association of Public-Safety Communications Officials (APCO) International, Inc. is the world's oldest and largest not-for-profit professional organization dedicated to the enhancement of public safety communications. With more than 15,000 members around the world, APCO International exists to serve the people who manage, operate, maintain, and supply the communications systems used to safeguard the lives and property of citizens everywhere.

APCO International's mission reflects the importance of the organization and its breadth of activities as they relate to membership needs. Our mission is to:

- Foster the development and progress of the art of public safety communications by means of research, planning, training and education;
- Promote cooperation between towns, cities, counties, states, and federal public safety agencies in the area of communications;
- Represent its members before communications regulatory agencies and policy-making bodies as may be appropriate; and through its efforts strive toward the end that the safety of human life, the protection of property and the civic welfare are benefited to the utmost degree; and
- Aid and assist in the rapid and accurate collection, exchange and dissemination of information relating to emergencies and other vital public safety functions.

Background & Purpose

The Americans with Disabilities Act gives civil rights protections to individuals with disabilities similar to those provided to individuals on the basis of race, color, sex, national origin, age and religion. It guarantees equal opportunity for individuals with disabilities in public accommodations, employment, transportation, state and local government services, and telecommunications.

APCO International supports the purpose and initiatives of the Americans with Disabilities Act and the federal agencies, such as Department of Justice and the Equal Employment Opportunity Commission, charged with establishing and enforcing compliance standards for governmental entities.

APCO International also recognizes that, despite the fact that this legislation was passed into law in 1990, many public safety agencies still struggle to comply with these requirements. For this reason and because we support full accessibility to public safety services and programs, APCO International established an ADA Task Force on August 15, 2002 to conduct a needs assessment for our membership related to providing services to people with disabilities. As a result of that needs assessment, APCO International has developed the following Americans with Disabilities Act (ADA) Training Standard for Communications Managers/Supervisors.

ADA Task Force

The participants of the task force were chosen to represent a broad range of membership, based on their expressed interest in ADA issues, and includes:

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Application

Through the use of this standard, APCO International is encouraging all of its chapters and members to develop timely, up-to-date and comprehensive training programs that will prepare communications managers/supervisors to develop effective policies and procedures for ensuring accessibility to people with disabilities to their services and programs and through their employment practices.

Further, it is recommended that communications managers/supervisors also refer to the *APCO ADA Training Standard for Communications Officers* for detailed information on the development of appropriate training programs for communications officers and Phone-Pal programs.

Training Program Administration & Management

Training Development

This standard is designed to assist local and state chapters/agencies in developing a comprehensive training program for communications managers/supervisors in developing processes for effectively providing equal access to emergency services to people with a variety of disabilities. This is a minimum 16 hour training standard; therefore, agencies should consider their individual needs and add to this standard for purposes of their local training program. However, guidance

has been provided on minimum training time recommendations, instructional methods, instructor/student ratios, equipment needs and resources.

Training Delivery

The Department of Justice and other relevant federal agencies that are responsible for the enforcement of the ADA mandates that each agency provide comprehensive training to its employees related to employment practices and accessibility to programs and services.

It is desirable for this training to be conducted prior to promotion of managers/supervisors or within a reasonable amount of time during their probationary period. Additionally, refresher training should be provided periodically, especially when changes in relevant statutory laws are enacted and new case law decisions are announced.

And, in keeping with this standard and ADA requirements, training coordinators should ensure that any training programs developed and delivered based on this standard are fully accessible to people with disabilities. Consideration should be given to registration processes to allow for identification of special needs of any attendees and subsequent arrangements should be made to accommodate those special needs requests.

Training Evaluation

Effective training evaluation is critical to successfully implementing this standard and ensuring the communications managers/supervisors are fully prepared to implement/apply the many provisions of the ADA. It is recommended that appropriate cognitive and performance-based evaluations be conducted to ensure students understand and can apply the information addressed throughout this standard. Refer to each standard for recommendations on whether evaluation of that individual standard can be best accomplished through cognitive and/or performance-based evaluation. The recommended minimum passing score should be no less than 70% but should reflect the minimum passing scores required of similar managerial training within your area.

Documentation & Record Keeping

It is critical that communications agencies and/or chapters keep accurate and up-to-date training records of each communications employee and that both initial and refresher training be conducted in accordance with the guidelines established within this standard. These records are subject to review by Department of Justice and other agencies in the case of complaint, lawsuit or audit.

Individual Training Records

Detailed records of all training attended by each individual communications employee should be kept within the agency. Those details should include:

1. Name of Trainee
2. Name of Training Class
3. Number of Training Hours
4. Test scores
5. Certificate of Completion or other proof of attendance

Agency/Chapter Training Records

Agencies conducting training related to this standard should also maintain training files, which document the following:

1. Name of the Seminar/Course
2. Number of Training Hours
3. Name and Social Security Number of all Instructors
4. Course Schedule
5. Copy of Lesson Plan taught or detailed information as to what was taught
6. Copy of any related course materials such as handouts, scenarios, etc.
7. List of all attendees including pass/fail designation
8. Courses longer than 4 hours should include an Attendance Roster initialed by each attendee for morning/afternoon/evening attendance

Training Standard Format

The following standard is divided into topical modules. Each module will list a performance standard and the enabling objectives to accomplish the identified performance standard. Following the enabling objectives will be recommendations related to:

- **Methods of Instruction** – For each objective, there are several possible types of instructional methods. Typically, a combination of methods which generate student interest and increases student activity is most effective.
- **Instructor/Student Ratios** – Although there is an instructor/student ratio recommendation with each objective, it is important for training coordinators to recognize that the instructor/student ratio are directly affected by the type and size of the training facility being used, the types of instructional methods employed and the instructor’s experience and preference based on the learning environment.
- **Type of Training Facility** – Traditionally an academic classroom facility is most appropriate for training purposes. However, many times these facilities are not readily available to PSAPs for training purposes which requires the use of make-shift classroom facilities. It is critical that the training environment be conducive to effective learning. Consideration should be given to lighting, seating arrangements, and equipment use that ensures that students can see and hear the instructor and training aids.
- **Media or Equipment** - Training results in more effective learning and longer retention when more of a student’s senses are stimulated. Consideration should be given to using a variety of training aids, media and equipment such as flip charts, overhead slides or data projection equipment, screens, TV/VCR and TTY equipment. The availability and inclusion of certain equipment may affect the instructor/student ratio as explained above.
- **Total Module Time (minimum)** – Since this a minimum training standard, in order to comply with this standard, training programs must at least meet this time frame. However, it is recommended that training coordinators consider their local training needs in conjunction with instructional methods to determine the most appropriate amount of time for the training which may exceed the minimum established time for each module.
- **Evaluation Method** – As indicated within each module, there are recommendations for evaluation methods. Written examinations are used to improve the learning process because it identifies gaps between learning and the instruction. They also aid students by providing incentives to learn and by reinforcing their learning through feedback. Great care must be taken to insure that written examinations are valid, comprehensive and differentiating in order to be able to attach any real

value to the grades provided. Performance examinations are extremely helpful in measuring specific skills when students demonstrate a measurable proficiency level under controlled conditions. However, training coordinators should recognize the importance of valid, realistic skills test development which reliably measures a student's ability to perform certain tasks under specified conditions. Sufficient time must be included in the number of training hours in order to effectively administer/evaluate performance examinations. Additionally, performance examinations will usually require a higher instructor to student ratio than that which is necessary in a classroom environment.

- **References and Resources** – The references and resources found throughout this document are included as a starting point for anyone who wishes to develop a training program related to this standard. It is highly recommended that training coordinators conduct comprehensive research when developing training programs and identify multiple sources of information which support their teaching points. Likewise, these links are likely to change over time so the use of search engines is also recommended.

Following the training standard section will be several appendices, which will be useful in adopting this standard.

ADA Training Standard for Communications Managers/Supervisors

Module I: Disability Awareness

Training Standard: Given a written and/or performance examination, students will identify specific considerations related to effective interaction with people with a variety of disabilities.

<i>Standard #</i>	Enabling Objectives	Methods of Instruction	Instructor/ Student Ratios	Facility Needed	Media & Equipment
<i>1.1</i>	Identify/describe issues and proper etiquette related to interaction with people with communications disabilities.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
<i>1.2</i>	Identify/describe issues and proper etiquette related to interaction with people with physical/visual disabilities.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
<i>1.3</i>	Identify/describe issues and proper etiquette related to interaction with people with cognitive/psychiatric disabilities.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
<i>1.4</i>	Describe important considerations for interaction with people with disabilities who are victims of crimes and other emergencies.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
<i>1.5</i>	Describe important considerations for interaction with people with disabilities who are affected by natural and man-made disasters.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard

Total Module Time (minimum): 2 hours

Evaluation Method: Written examination

References and Resources: American Red Cross, Disaster Preparedness for People with Disabilities:
<http://www.redcross.org/services/disaster/beprepared/disability.pdf>

Independent Living USA: Home Page
www.ilusa.com

Public Law 101-336
<http://www.usdoj.gov/crt/ada/pubs/ada.txt>

The New Freedom Initiative's Online Resource for Americans with Disabilities

<http://www.disabilityinfo.gov/>

U.S. Department of Justice: ADA Home Page

<http://www.usdoj.gov/crt/ada/adahom1.htm>

U.S. Department of Justice, Office of Victims of Crime: First Response to Victims of Crime Who Have a Disability

<http://www.ojp.usdoj.gov/ovc/publications/infores/firstrep/2002/welcome.html>

ADA Training Standard for Communications Managers/Supervisors

Module II: Overview of the Americans with Disabilities Act (ADA)

Training Standard: Given a written and/or performance examination, students will describe legal requirements of the Americans with Disabilities Act and other relevant laws in accordance with federal, state and local laws/regulations.

<i>Standard #</i>	Enabling Objectives	Methods of Instruction	Instructor/ Student Ratios	Facility Needed	Media & Equipment
2.1	Define disability and identify who is a qualified individual under the ADA.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
2.2	Identify resources for demographics of the disabled population.	Lecture, discussion	Lecture, discussion	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
2.3	Describe the purpose of Public Law 101-336: The Americans with Disabilities Act (ADA).	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
2.4	Explain the legislative background prior to the passage of the ADA.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
2.5	Define terms used in the ADA and related documents. (See Appendix A)	Lecture, discussion, practical exercise	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
2.6	Explain the consequences for failing to comply with ADA regulations.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
2.7	Describe the legal ramifications involved in retaliation related to ADA claims.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard

Total Module Time (minimum): 2 hours

Evaluation Method: Written examination

References and Resources:

Disability Law Resource Project: Topical Index of Statutes, Regulations, Case Law, and Articles

<http://www.dlrp.org/html/topical/index.html>

Equal Employment Opportunity Commission: Quick Start for Employers

<http://www.eeoc.gov/qs-employers.html>

Public Law 101-336

<http://www.usdoj.gov/crt/ada/pubs/ada.txt>

The New Freedom Initiative's Online Resource for Americans with Disabilities

<http://www.disabilityinfo.gov/>

U.S. Department of Justice: ADA Home Page

<http://www.usdoj.gov/crt/ada/adahom1.htm>

U.S. Department of Justice: A Guide to Disability Rights Laws

<http://www.usdoj.gov/crt/ada/cguide.htm>

ADA Training Standard for Communications Managers/Supervisors

Module III: ADA Administrative Requirements

Training Standard: Given a written and/or performance examination, students will describe the requisite administrative requirements of the Americans with Disabilities Act.

<i>Standard #</i>	Enabling Objectives	Methods of Instruction	Instructor/ Student Ratios	Facility Needed	Media & Equipment
3.1	Explain the duties and function of a compliance coordinator.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
3.2	Describe proper grievance procedures.	Lecture, discussion, practical exercise	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
3.3	Describe/demonstrate the completion of a self-evaluation audit. (See Appendix B)	Lecture, discussion, practical exercise	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
3.4	Explain proper notification of nondiscriminatory practices.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
3.5	Explain the rules regarding retention of files according to the ADA.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard

Total Module Time (minimum): 2 hours

Evaluation Method: Written and/or performance examination

References and Resources: Disability Law Resource Project: Topical Index of Statutes, Regulations, Case Law, and Articles
<http://www.dlrp.org/html/topical/index.html>

Equal Employment Opportunity Commission: Quick Start for Employers
<http://www.eeoc.gov/qs-employers.html>

Public Law 101-336

<http://www.usdoj.gov/crt/ada/pubs/ada.txt>

The New Freedom Initiative's Online Resource for Americans with Disabilities

<http://www.disabilityinfo.gov/>

U.S. Department of Justice: ADA Home Page

<http://www.usdoj.gov/crt/ada/adahom1.htm>

ADA Training Standard for Communications Managers/Supervisors

Module IV: Employment – Title I

Training Standard: Given a written and/or performance examination, students will describe/demonstrate how to properly implement employment practices in accordance with Title I of the Americans with Disabilities Act.

<i>Standard #</i>	Enabling Objectives	Methods of Instruction	Instructor/ Student Ratios	Facility Needed	Media & Equipment
4.1	Identify/describe employment provisions under the ADA.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
4.2	Identify/describe proper employment practices related to: 4.2.1 Job Descriptions 4.2.2 Job Announcements 4.2.3 Job Applications 4.2.4 Applicant Screening 4.2.5 Applicant Selection/Hiring 4.2.6 Conditional Job Offers 4.2.7 Medical & Other Testing 4.2.8 Training 4.2.9 Discipline 4.2.10 Termination	Lecture, discussion, practical exercise, case review	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
4.3	Demonstrate ability to carry out an essential job function analysis.	Lecture, discussion, practical exercise	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
4.4	Design key elements required for a quality assurance program.	Lecture, discussion, practical exercise	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard

Total Module Time (minimum): 6 hours

Evaluation Method: Written and/or performance examination

References and Resources: Disability Law Resource Project: Topical Index of Statutes, Regulations, Case Law, and Articles
<http://www.dlrp.org/html/topical/index.html>

Equal Employment Opportunity Commission: Quick Start
for Employers

<http://www.eeoc.gov/qs-employers.html>

Public Law 101-336

<http://www.usdoj.gov/crt/ada/pubs/ada.txt>

The New Freedom Initiative's Online Resource for Americans with
Disabilities

<http://www.disabilityinfo.gov/>

U.S. Department of Justice: ADA Home Page

<http://www.usdoj.gov/crt/ada/adahom1.htm>

U.S. Department of Labor: Job Accommodation Network

<http://janweb.icdi.wvu.edu/>

ADA Training Standard for Communications Managers/Supervisors

Module V: State and Local Government Activities - Title II

Training Standard: Given a written and/or performance examination, students will describe/demonstrate how to properly implement procedures to provide direct and equal access to public services and programs in accordance with Title II.

<i>Standard #</i>	Enabling Objectives	Methods of Instruction	Instructor/ Student Ratios	Facility Needed	Media & Equipment
5.1	Describe the requirements of the “direct access” and “equal access” mandates.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
5.2	Identify technologies available for handling TTY calls.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard TTY equipment
5.3	Describe requirements for overall system design for PSAPs for TTY access.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
5.4	Identify key components of a comprehensive training program for employees.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
5.5	Identify/develop appropriate standard operating procedures for compliance with ADA requirements.	Lecture, discussion, practical exercise	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
5.6	Describe/develop the key elements of a quality assurance program.	Lecture, discussion, practical exercise	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
5.7	Describe/develop an effective public education program related to access to public services.	Lecture, discussion, practical exercise	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard

Total Module Time (minimum):	2 hours
Evaluation Method:	Written and/or performance examination
References and Resources:	<p>Association of Public-Safety Communications Officials, (APCO) International: <i>ADA Training Standard for Communications Officers</i>.</p> <p>Disability Law Resource Project: Topical Index of Statutes, Regulations, Case Law, and Articles http://www.dlrp.org/html/topical/index.html</p> <p>Public Law 101-336 http://www.usdoj.gov/crt/ada/pubs/ada.txt</p> <p>U.S. Department of Justice: ADA-Access for 9-1-1 and Telephone Emergency Services Technical Assistance http://www.usdoj.gov/crt/ada/911ta.pdf</p> <p>U.S. Department of Justice: ADA Home Page http://www.usdoj.gov/crt/ada/adahom1.htm</p>

ADA Training Standard for Communications Managers/Supervisors

Module VI: Public Accommodations - Title III

Training Standard: Given a written and/or performance examination, students will describe/demonstrate how to properly implement public access and employee accommodation requirements for existing and new structures in accordance with Title III.

<i>Standard #</i>	Enabling Objectives	Methods of Instruction	Instructor/ Student Ratios	Facility Needed	Media & Equipment
6.1	Describe the significance of the Americans with Disabilities Act Accessibility Guidelines (ADAAG).	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
6.2	Define what are structural and non-structural changes.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
6.3	Identify/describe reasonable accommodation requirements for employees.	Lecture, discussion, practical exercise	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
6.4	Identify/describe reasonable accommodation requirements for public access.	Lecture, discussion, practical exercise	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
6.5	Identify the considerations related to PSAPs located in historical buildings.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
6.6	Identify/describe elements of a transition plan.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard

Total Module Time (minimum): 1 hour

Evaluation Method: Written and/or performance examination

References and Resources: Disability Law Resource Project: Topical Index of Statutes, Regulations, Case Law, and Articles
<http://www.dlrp.org/html/topical/index.html>

Public Law 101-336

<http://www.usdoj.gov/crt/ada/pubs/ada.txt>

The Access Board: A Federal Agency Committed to Accessible
Design: Accessibility Requirements

<http://www.access-board.gov/publications/ADAFactSheet/A13.html>

U.S. Department of Justice: ADA-Access for 9-1-1 and Telephone
Emergency Services Technical Assistance

<http://www.usdoj.gov/crt/ada/911ta.pdf>

U.S. Department of Justice: ADA Home Page

<http://www.usdoj.gov/crt/ada/adahom1.htm>

ADA Training Standard for Communications Managers/Supervisors

Module VII: Telecommunications Relay Services - Title IV & Miscellaneous Provisions – Title V

Training Standard: Given a written and/or performance examination, students will describe/demonstrate proper procedures and issues related to handling emergency calls via telecommunications relay services and describe the miscellaneous provisions of Title V.

<i>Standard #</i>	Enabling Objectives	Methods of Instruction	Instructor/ Student Ratios	Facility Needed	Media & Equipment
7.1	Describe the mandates related to receiving emergency calls from telecommunications relay services.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
7.2	Identify/describe technical difficulties related to telecommunications relay calls.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
7.3	Identify/describe effective call handling procedures for relay calls during emergency and non-emergency situations.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard
7.4	Describe the miscellaneous provisions of Title V.	Lecture, discussion	1:24	Academic Classroom	Overhead or Data projector Flip Charts Chalkboard

Total Module Time (minimum): 1 hour

Evaluation Method: Written examination

References and Resources: Disability Law Resource Project: Topical Index of Statutes, Regulations, Case Law, and Articles
<http://www.dlrp.org/html/topical/index.html>
 Federal Communications Commission: State Relay Programs
<http://www.fcc.gov/cgb/dro/state.html>
 Public Law 101-336
<http://www.usdoj.gov/crt/ada/pubs/ada.txt>

U.S. Department of Justice: ADA-Access for 9-1-1 and Telephone
Emergency Services Technical Assistance
<http://www.usdoj.gov/crt/ada/911ta.pdf>

U.S. Department of Justice: ADA Home Page
<http://www.usdoj.gov/crt/ada/adahom1.htm>

Appendices

Appendix A: Glossary of Terms

<i>Terminology</i>	<i>Definition</i>
<i>Acoustic Coupler</i>	<i>The rubber cups which hold the telephone handset on the TTY.</i>
<i>Adaptive Equipment</i>	<i>Equipment that helps a person move, groom, or eat independently, such as mobility aids, grooming aids, feeding aids, and similar devices used to offset functional limits.</i>
<i>American Sign Language</i>	<i>Also referred to as ASL, American Sign Language is a visual/gestural language with vocabulary, grammar, idioms, and syntax different from English. ASL is the language of the deaf community in the United States and Canada (except Quebec)—a cultural group of people who share a common language, values, attitudes, and experiences.</i>
<i>American Standard Code for Information Interchange (ASCII)</i>	<i>This standard defines the code for a character set to be used for information interchange between equipment of different manufacturers and is a standard for data communications over telephone lines. In the context of TTY, it refers to both a binary code and modulation method used for 110/300 baud TTY communications.</i>
<i>ASL Gloss</i>	<i>The reference to “ASL Gloss” is when American Sign Language is communicated through typing – as on a TTY – and many of the visual elements crucial to clear communications is lost.</i>
<i>Augmentative Communication Device</i>	<i>A device used to help a person communicate by voice.</i>
<i>Baudot code</i>	<i>A five bit encoding scheme that represents text and digits. It is the standard transmission signaling scheme used by TTY devices.</i>
<i>Blindness/Visual Disability</i>	<i>A visual condition that interferes with a person’s ability to see or results in the absence of all sight.</i>
<i>Cognitive Impairment</i>	<i>A medical condition or injury that affects a person’s ability to understand spoken or written information.</i>
<i>Communications Disability</i>	<i>A medical condition or injury that interferes with a person’s ability to communicate by using one’s voice.</i>
<i>Deafness/Hearing Disability</i>	<i>A medical condition or injury that interferes with a person’s ability to hear sound.</i>
<i>Direct Access</i>	<i>Direct access means that PSAPs can directly receive TTY calls without relying on an outside relay service or third-party services.</i>
<i>Direct Connect</i>	<i>This is a method of connecting a TTY directly into the phone line. When using direct connect, you can dial directly from the keyboard and use auto-answer features.</i>
<i>Disability</i>	<i>A physical or mental impairment that substantially limits one or more of the major life activities of an individual.</i>
<i>Evacuation Assistive Equipment</i>	<i>Equipment or devices used to help people leave a building in an emergency.</i>
<i>Equal Access</i>	<i>Equal access means that the telephone emergency services provided for TTY users are as effective as those provided for persons who make voice calls, in terms of response time, response quality, hours of operation; and all other features offered (e.g., automatic number identification, automatic location identification, automatic call distribution).</i>

GA	<i>TTY protocol that means “go ahead” indicating to the other party that it is their turn to type.</i>
Hearing Carry Over (HCO)	<i>A method which utilizes both voice and text communications on the same call, allowing a person who is speech impaired to listen to the other party’s conversation and respond by typing via a TTY or other means of text communications.</i>
Mobility Disability	<i>A medical condition or injury that impedes a person’s ability to walk or move.</i>
Personal Care Assistant	<i>A person who assists someone with a disability with their daily personal needs such as bathing, dressing, grooming, cooking, and feeding.</i>
Power-Dependent Equipment	<i>Equipment that requires electricity to operate.</i>
Prelingual Deafness	<i>The loss of hearing before the development of language skills.</i>
Q or QQ	<i>TTY protocol that indicates a question is being asked of the other party.</i>
Qualified Individual	<i>A qualified individual with a disability is a person who meets legitimate skill, experience, education, or other requirements of an employment position that he or she holds or seeks, and who can perform the "essential functions" of the position with or without reasonable accommodation.</i>
Reasonable Accommodation	<i>Reasonable accommodation is a modification or an adjustment to a job or the work environment that will enable a qualified applicant or employee with a disability to participate in the application process or to perform essential job functions. Reasonable accommodation also includes adjustments to assure that a qualified individual with a disability has rights and privileges in employment equal to those of nondisabled employees.</i>
Service Animal	<i>A specially-trained animal used by a person with a disability to help with daily living. These animals are allowed by law to accompany their owners anywhere.</i>
SK	<i>TTY protocol that means “stop keying” and is usually used in conjunction with GA to indicate that a caller or other typing party is getting ready to end the conversation. For example: GA to SK.</i>
SKSK	<i>TTY protocol that means “stop keying, stop keying.” This officially ends a TTY conversation.</i>
TDD	<i>Telecommunications Device for the Deaf.</i>
Text Telephone	<i>Another term, since a TTY is used by other than deaf people.</i>
Teletypewriter (TTY)	<i>Also known as TDD. A device capable of information interchange between compatible units using a dial up or private-line telephone network connection as the transmission medium. ASCII or Baudot codes are used by these units.</i>
Voice Carry Over (VCO)	<i>A method which utilizes both voice and text communications on the same call, allowing a person who is hearing impaired to speak directly to the other party and receive response via a TTY or other means of text communications.</i>

Appendix B: Self-Evaluation Guidelines

The Americans with Disabilities Act: P.L.101-336, Title II requires that public entities take several steps designed to achieve compliance. These include the preparation of a self-evaluation. In addition, public entities with 50 or more employees are required to --

- 1) Develop a grievance procedure;
- 2) Designate an individual to oversee title II compliance;
- 3) Develop a transition plan if structural changes are necessary for achieving program accessibility; and
- 4) Retain the self-evaluation for three years.

How does a public entity determine whether it has "50 or more employees"? Determining the number of employees will be based on a governmentwide total of employees, rather than by counting the number of employees of a subunit, department, or division of the local government. Part-time employees are included in the determination.

Communications managers should consult with their government's ADA Coordinator to determine appropriate self-evaluation procedures for their particular agency. However, the following is a sample TTY Accessibility Self-Evaluation Checklist for PSAPs.

TTY Accessibility Self-Evaluation Checklist for PSAPs
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The TDD/TTY Accessibility Checklist can be used as a tool in the self evaluation process required of all agencies. Developed originally to assist agencies in Texas, this document incorporates requirements found within the ADA and common areas found within settlement agreements. Once you have completed the checklist, you will have a better idea of areas that may need further attention. Established operating procedures and a comprehensive training program are key to a successful emergency response system. It also reflects the agency's commitment to the protection of lives and property in the community it serves. It is recommended that you maintain documentation of your evaluation process for review if audited by the Department of Justice.

HOW TO USE THIS DOCUMENT: The following is provided as a sample of questions that should be asked in a self analysis of your 9-1-1 system and services. The more questions that are answered "yes", the more likely the department will provide meaningful telephone emergency response service to those using TDD/TTY's. If "no", you may want to consider taking action and documenting a timeline.

TTY Accessibility Self-Evaluation Checklist for PSAPs
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SELF EVALUATION (TITLE II, Sec. 35.105)	Yes	No	Comments
Have the current services, policies, and practices, and the effects thereof, that do not or may not meet the requirements, been evaluated and to the extent modification of any such services, policies, and practices is required, made necessary modification?			
Has the opportunity been provided to interested persons, including individuals with disabilities or organizations representing individuals with disabilities participated in the self-evaluation process by submitting comments?			
Has the public entity made 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 made such information available to them in such a manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured to them by the ADA?			

Does the entity that employs 50 or more persons have a published grievance procedure providing for prompt and equitable resolution of complaints alleging any action that would be prohibited by the ADA?			
EQUIPMENT	Yes	No	Comments
Does the telephone emergency response system provide the same level of service, i.e. Automatic Number Identification (ANI) and Automatic Location Identification (ALI), to all citizens, including those who call with a TDD/TTY?			
In the event of individual line or system failure, is an alternative method of receiving emergency calls accessible to TDD/TTY callers?			
Are all consoles that are available for receiving emergency calls equipped with TDD/TTY accessible equipment?			
Is redundancy in the 9-1-1 equipment provided for? If the answer to the previous question is yes, is TDD/TTY accessible equipment included in the redundancy plan?			
Does the equipment and method used to transfer emergency calls to other emergency services provide for accessibility with TDD/TTYs?			
If your system utilizes automatic call distribution and includes an automatic recording to the citizen who may be put into a queue until there is an available telecommunicator, does the recording include a TDD/TTY recorded message?			
Do equipment upgrade or expansion plans include TDD/TTY accessibility?			
Does the recording equipment (which records incoming emergency lines) include recording the point of answer for TDD/TTYs?			
Are the TDD/TTYs located where the call taker can switch from voice mode of communication to TDD/TTY without causing delay in answer time?			
Can VCO (voice carry-over) and HCO (hearing carry-over) calls be handled with the current system?			
If the TDD/TTY equipment has preprogrammed messages, have persons with hearing impairment been consulted regarding the appropriate language for TDD/TTY users?			
Has the center explored the feasibility of, or has TDD/TTY detection equipment been installed?			
Does the communications system have the capability to provide TDD/TTY access to alternative non-emergency numbers?			

Can the call taker make a call back using a TDD/TTY?			
Do you have a maintenance plan for the TDD/TTY equipment and procedures (including documentation) for such?			
OPERATIONS	Yes	No	Comments
Has your agency developed and implemented Standard Operating Procedures (SOPs) for responding to TDD/TTY calls?			
Have SOPs been written for TDD/TTY call handling and disseminated to call-taking personnel?			
Do secondary PSAPs have the capability to answer TDD/TTY calls?			
Is the standard time for answering voice calls comparable to that for TDD/TTY calls?			
Do the call-back procedures include contingencies for reaching a citizen who uses a TDD/TTY?			
Does the center keep entries or statistics of TDD/TTY calls?			
Are there procedures for handling Telecommunication Relay Services (TRS) calls?			
Has the agency developed and incorporated effective methods for transferring TDD/TTY calls to the fire department or EMS? (Note: only applicable if voice calls are handled this way.)			
Has the agency developed and implemented SOPs for processing silent open-line calls? Does the call taker interrogate the line for a possible TDD/TTY call? (see Title II Technical Assistance Manual)			
Is there a program in place to test the TDD/TTY with the overall system?			
TRAINING	Yes	No	Comments
Are there minimum TDD/TTY training requirements for telecommunicators?			
Does the agency provide a comprehensive TDD/TTY training program for all call takers?			
Are refresher classes provided at a minimum of every 6 months?			
Is someone assigned to follow technological development through the various public safety associations and add these innovations into the training regiment?			

OTHER	Yes	No	Comments
Have members of the disability community been consulted in the self-evaluation process, including the creation of standard operating procedures and the development of training.			
Has a public awareness program been developed and implemented, to notify citizens using TDD/TTYs of the department's accessibility and services?			
Does the local telephone directory indicate direct access to telephone emergency services for TDD/TTY users? (DOJ has provided approved language)			

** The Americans with Disabilities Act: P.L.101-336, Title II, Section 35.162*