

Introduction

In an effort to provide and maintain compliance with the American with Disabilities Act, the City of Stamford 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) and the CT State Code. 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 City of Stamford community.

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

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

Corrective action is needed in policies and procedures to create written policies that would ensure the City of Stamford's compliance with applicable laws. In addition, the City may wish to consider making a commitment to a more accessible website. 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 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 and 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 a written ADA questionnaire submitted by twenty (20) departments from the City of Stamford, additional information submitted by some departments and from the City's website. This mix of sources constitutes the basis for this compliance assessment report. From the staff responses 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 Stamford 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; it also includes IHCD's recommendations for the City of Stamford to implement.

I - 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 requirements.

Finding

The City of Stamford has met its obligation to designate a responsible employee by appointing Ellen Bromley from the Social Services Department, as the City's ADA Coordinator.

Recommendations

The City should consider clarifying for its entire community and employees the name and scope of responsibilities of the ADA Coordinator. Doing so will improve compliance and make more efficient operations with respect to the needs of members of the public with disabilities.

Furthermore, clarification on 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 these 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.

II - Complaint 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

From the responses submitted by staff, some departments refer to the City’s grievance procedure, others responded that they “*have no ADA grievance procedures.*” It is not clear if staff is aware of their ADA obligation and the process for meeting the requirement for grievance procedures.

The City’s website provides a grievance procedure form but is only intended for the City’s employees; there is nothing regarding complaint procedures for members of the public.

The Police department has a “*Citizen Complaint Form*” on its website but not clear where the compliant form should be sent.

It is not clear if the City has a policy or method of dissemination to meet its obligations under Title II that requires appropriate due process and prompt and equitable resolution of complaints alleging any discrimination for members of the public as is defined in the regulations (28 CFR Part 107 (b)).

Recommendations

The City should take steps to clarify its grievance processes regarding members of the public. IHCD recommends that grievance procedure include the following components:

- Ensure the City’s employees are aware of the grievance procedure and can provide information to members of the public about the process when appropriate.

- The name, office address, telephone number and email of the designated employee to whom the complaint should be addressed.
- A detailed description of the procedures for submitting a grievance;
- A two-step review process that allows for appeal;
- Reasonable time frames for review and resolution of the grievance;
- Provide the grievance procedure form on the City’s website and state the commitment to provide copies in alternate formats upon request.
- Good record-keeping for all complaints submitted and documentation for steps taken towards resolution;

(See attachment 1 - Sample)

III – 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

The City has an ADA Notice posted on employee bulletin boards but employees do not appear to be aware of those notices. Furthermore, from the responses, it appears that some departments are not aware of their ADA Notice obligations.

From the responses submitted by staff it seems that the City of Stamford does not have a uniform policy regarding the posting of ADA Non-Discrimination Notices for members of the public. Most City departments reported that notices were not posted.

The Department of Recycling and Sanitation reported having an ADA Notice posted in the main office area; and the Land Use Bureau also reported having a Notice included in all their notices for public hearing.

Also from answers provided by staff, IHCD found no statement about the obligation to provide notification of non-discrimination policies relative to people with disabilities in materials disseminated to members of the public.

Finally, there is a non-discrimination mission statement on the Human Resources page but that is intended only for the City's employees. There is no notification to participants of the City's non-discrimination policies on the City's website.

Recommendations

The City should revise its 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; and identify its ADA Coordinator by:

- Publishing the Notice in all the materials distributed by the City; post the Notice on the City's website home page (Stamford Access for All web-page). Also, post copies in public locations in the City's buildings.
- Including the ADA Coordinator's name, address, telephone number and email address on the Notice. The City may meet these requirements by including appropriate inserts in existing materials and publications that contain general information disseminated to staff and members of the public.

(See attachment 2 - Sample)

IV - 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

From the responses submitted by the staff, it is not clear whether the City has developed policies regarding reasonable modification of policies, practices and procedures. Some departments did not know or were not aware of their obligations.

There have been some instances when modification of policies were denied due to participants' medical issues that involved toileting/changing diapers or administering medication; that has happened especially in summer camps.

The City has written policies allowing extra time to individuals with documented disabilities.

Recommendations

- Adopt policies, practices and procedures for responding to request for modifications by members of the public with disabilities. The City of Stamford may want to post a notice such as:

“The City of Stamford will not discriminate against any individual with a disability on the basis of disability with regard to the full and equal enjoyment of the services. The City of Stamford will make reasonable modifications in its policies, practices, or procedures, when the modifications are necessary to afford services to individuals with disabilities, unless the City can demonstrate that making the modifications would fundamentally alter the nature of its services”.

- Ensure the City’s employees can provide information to members of the public about the process of requesting reasonable modification of policies when appropriate.
- Provide the form for requesting reasonable modifications of policies on the City’s website and state the commitment to provide copies in alternate formats upon request.
- Include the ADA Coordinator’s name, address, telephone number and email address on the form.
- As evidenced by settlement agreements, is the Department of Justice’s position that it will be a reasonable modification required by the ADA for certain entities, such as summer camps to train laypersons to administer medication in an emergency situation. The training should be conducted and repeated annually. In addition, a list of trained staff should be maintained in the Director’s Office. (See settlement agreement: http://www.ada.gov/camp_bravo_sa.html)
- The City should determine when it is a reasonable modification to provide toileting/changing diapers for a child who needs diapering because of a disability and the program does not normally provide diapering. Factors to consider including, but not limited to:
 - (1) Whether children without disabilities are young enough to need intermittent toileting assistance when, for instance, they have accidents;
 - (2) Whether providing toileting/changing diapers on a regular basis would require a staff person to leave other children unattended; and
 - (3) Whether the City would have to purchase diapering tables or other equipment.

Keep in mind that if the summer camp never provides toileting assistance to any child, then such a personal service would not be required for a child with a disability. Even in these circumstances, the child could not be excluded from the program because he/she was not toilet trained; the City may consider other arrangements, such as having a parent or personal assistant come and do the diapering.

- Clarify the “no pets” policies so that they do not apply to people who use service animals.

V – Eligibility Criteria

A Title II entity may not impose eligibility criteria that may prevent a person with a disability to participate 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 person with disabilities, unless it can show that such requirements are necessary for the provision of the service, program or activity.

Findings

From the responses from staff there are a few programs that require eligibility.

There are also eligibility criteria for positions listed in the job descriptions for the City.

It was mentioned by staff that they have registration forms to “gather as much information as we can on campers who have special needs”

Recommendations

- Make sure the City does not impose eligibility criteria that either screen out or tend to screen out persons with disabilities, unless the City can demonstrate that such requirements are necessary for the provision of the service, program or activity.
- The City may impose legitimate safety requirements necessary for the safe operation of its services, programs or activities (i.e., the policies developed by the Water Pollution Control Authority) but those safety requirements must be based on real risks not generalization about individuals with disabilities.
- Make sure that requesting as much information as possible is needed to ensure safe participation in camp activities.

VI - 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)).

This requires that ADA Title II entities make reasonable accommodation to qualified employees with disabilities. Reasonable accommodation may include modifying work schedules, job restructuring, and making facilities used by employees readily accessible to employees with a disability.

Note that the requirements of Title I of the ADA, as established by the regulations of the Equal Employment Opportunity Commission in 29 CFR Part 1630, apply to employment in any service,

program, or activity conducted by a public entity if that public entity is also subject to the jurisdiction of ADA Title I. (28 CFR Part 35.140 (b)(1)).

Findings

From the responses from the ADA questionnaire, there is no evidence that the City has failed to provide reasonable accommodation to its employees. Most departments refer to the City's policies.

IHCD received forms for requesting reasonable accommodation under the ADA but those forms are not listed on the Human Resources page.

The Human Resources page on the City's website provides information under the Family Medical Leave Act (FMLA) and a form for requesting FMLA leave.

Recommendations

- IHCD recommends complying with the requirement of reasonable accommodation under the ADA by including appropriate inserts in materials and publications that contain general information disseminated to the City's staff.
- Make sure the *City of Stamford Employee Complaint* form provides the complete contact information of the person to whom the complaint should be sent. Also make sure that the form is in an accessible format and that the process is clear for requesting other accessible formats (e.g., braille).
- Make sure the forms that are on the Human Resources website page are on an accessible format.

Suggestion: The national Job Accommodation Network is the most comprehensive, practical resource for understanding the job accommodation process: <http://www.askjan.org>

VII – 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 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 an information desk in Government Center, 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 Stamford) 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, in the City of Stamford 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

The City has guidelines available to all departments in the Human Resources' share drive. However, most departments responded they "don't know" or "N/A" other departments referred to the City's policies but not sure if staff know the procedures of providing effective communication.

It was mentioned that in the last two years, the City has provided "*sign language interpreters, readers for individual who had cognitive problems and allowed more time for individuals with documented learning disabilities*".

Staff also mentioned that they '*attempt to serve all public and accommodate communication difficulties*' or that they '*will read the info to the individual... use an interpreter... employees look for acknowledgment of understanding from the individual.*'

Request by an individual with hearing impairments to provide amplification systems was sent to the Mayor's Office. The Project Manager for Stamford reported to IHCD that there had been a complaint about lack of Assistive Listening Systems and they asked for assistance from IHCD to clarify responsibilities.

It is not clear if information available in print format is currently available in alternate electronic formats or on the website.

Finally, the website contains a great number of features that allow users with disabilities to access information. A lot of good work has been done and the website platform of *stamfordct.gov* meets these web accessibility standards; however the content of the website is not always accessible. It seems the issue has more to do with the maintenance of the website accessibility and the training of the staff on accessibility.

A key concern for the City's website is that the forms provided on the website are not accessible. They are either scanned documents that are inaccessible or PDF's that can be read but not filled in by some users with disabilities.

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 Stamford would benefit from a written policy on Effective Communication so that staff across all departments have an understanding of their responsibility and clarify about what to do. Stamford has requested a training with all departments and staff dealing directly with the public. That will be scheduled as soon as possible through IHCD's New England ADA Center.
- Distribute the effective communication notice to all department heads; published 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 them 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 on the Deaf and Hearing Impaired.
- The City has already expressed interest in having a training on Effective Communication and that should include all departments and all staff who deal directly or on the phone with the public. Ideally, the City will also develop a system for training staff to meet these responsibilities especially knowing the processes for securing braille, making large print, other types of alternate 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.

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- 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 should be included in the general information for the public as well as on the City’s website.

Sample of Effective Communication request:

“The City of Stamford 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 Connecticut 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 alternate 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 alternate 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.
- 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 Section K on Web Based Services and Programs)
- 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 for all the forms available on the City’s website.
- Include captioning for all the videos available on the website.

(See attachment 3 - Sample)

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.

Telephone emergency services, including 911 services, shall provide direct access to individuals who use TDD's and computer modems. (28 CFR 35.162)

NOTE: *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.*

VIII – Emergency Preparedness, Evacuation Plans, and Emergency Shelters

While a review of the City of Stamford'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 views emergency preparedness, shelters and evacuation plans as 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; 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/odic/fnss_guidance.pdf

Additionally, we recommend considering engaging the National Fire Protect Association (NFPA) for evacuation training and guidance, providing and load-verifying backup power source for elevator to address F.N.S.S. emergency shelter needs, installing one or more accessible shower 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.

Attachment 1 - Sample

**The American with Disabilities Act
GRIEVANCE PROCEDURE**

Any person who believes he or she has been subjected to discrimination on the basis of disability may file a grievance under this procedure. It is against the law for the City of Stamford to retaliate against anyone who files a grievance or cooperates in the investigation of a grievance.

Procedure:

- Grievances must be submitted to the ADA Coordinator within xx days of the date the person filing the grievance becomes aware of the alleged discriminatory action.
- A complaint must be in writing, containing the name and address of the person filing it. The complaint must state the problem or action alleged to be discriminatory and the remedy or relief sought.
- The ADA Coordinator shall conduct an investigation of the complaint. This investigation may be informal, but it must be thorough, affording all interested persons an opportunity to submit evidence relevant to the complaint. The ADA Coordinator will maintain the files and records of XX relating to such grievances.
- The ADA Coordinator will issue a written decision on the grievance no later than xx days after its filing.
- The person filing the grievance may appeal the decision of the ADA Coordinator by writing to the (xx) within xx days of receiving the ADA Coordinator's decision. The (xx) shall issue a written decision in response to the appeal no later than xx days after its filing.

The City of Stamford will make appropriate arrangements to ensure that people with disabilities are provided other accommodations, if needed, to participate in this grievance process. Such arrangements may include, but are not limited to, providing sign language interpreters for people who are deaf, providing taped cassettes of material for people who are blind, or assuring accessible location for the proceedings. The ADA Coordinator will be responsible for such arrangements.

Questions, complaints and request for additional information should be sent to the City's designated ADA Coordinator (name, title, office address, telephone, TTY and email).

Attachment 2 - Sample

Notice Under the Americans with Disabilities Act

In accordance with the Americans with Disabilities Act (ADA), the City of Stamford does not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment: The City of Stamford does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

Effective Communication: The City of Stamford will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in City's programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: The City of Stamford will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all the City's programs, services, and activities. For example, individuals with service animals are welcomed in City's facilities, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in the City's program, service, or activity, should contact the office of **[name and contact information for ADA Coordinator]** as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the City of Stamford to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that the City's program, service, or activity is not accessible to persons with disabilities should be directed to **[name and contact information of ADA Coordinator]**.

The City of Stamford will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

Attachment 3 -Sample

The City of Stamford may want to consider posting this Notice in the lobby, on the website and in print brochures.

Under the ADA the City of Stamford provides an equal opportunity for people with disabilities to participate in programs, services and activities. If you have a disability and you need an auxiliary aid and/or service (such as a sign language interpreter, an assistive listening device or print material in braille, large print, audio or in digital format) please contact: **name and contact information of ADA Coordinator.**

Reference List

Department of Justice:

- Americans with Disabilities Act Title II Regulations:
http://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm
- ADA Tool kit: Emergency Management from Department of Justice:
<http://www.ada.gov/pcatoolkit/chap7emergencymgmt.pdf>
- 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

Job Accommodation Network:

<http://www.askjan.org>