

## City of Lawrence

### Americans with Disabilities Act Assurance Policies

#### 1. *Eligibility Requirements Assurance*

Eligibility requirements for our programs are reviewed on a regular basis, and it has been determined they do not tend to screen out people with disabilities. All safety requirements are similarly reviewed and it has been determined that there are no discriminatory requirements. If any new criteria are developed their impact on persons with disabilities will be reviewed by the Mayor of Lawrence, the ADA Coordinator, and others as appropriate.

#### 2. *Assurance Regarding Surcharges*

It is the policy of the City of Lawrence that surcharges are never charged to staff / participants (nor any other interested person) for reasonable accommodations under any circumstances. Such accommodations include, but are not limited to: American Sign Language (ASL) interpreters, Computer Aided Realtime Translation (CART), architectural accessibility, computer accessibility hardware or software, Braille material, or any other costs related to the participation of a person with a disability.

- A. Integrated Services: It is the policy of the City of Lawrence that all of our services, programs, and activities are provided in the most integrated setting possible. People with disabilities are never required to participate in separate programs.
- B. Significant Assistance: It is the policy of the City of Lawrence that programs to which we provide significant support (or contract with) may not discriminate against people with disabilities.
- C. Accessible Transportation: It is the policy of the City of Lawrence that all transportation services provided are accessible to everyone regardless of their disability. In addition, any buses we own are equipped with a wheelchair lift, tie downs, etc. Any future bus purchases will also be accessible. The City of Lawrence is responsible for coordinating the provision of accessible transportation. City of Lawrence is an accessible transportation provider. Our procedure is to call 978-620-3010 and ask for the ADA Coordinator, and schedule the trip at least one week in advance.
- D. Community Referral: Whenever the City of Lawrence participates in other programs and services as a condition of participation, or makes reference to other programs, it is our policy that such programs and services must be accessible. The City of Lawrence has information regarding which of the programs (to which it may refer people) are

accessible, and which are not. Please note that there is at least one accessible provider in each of the categories of services in which we make referrals.

3. *Training Assurance Policy Regarding non-Discriminatory Operations*

It is the policy of the City of Lawrence that staff training and other staff development activities provided by agency personnel and volunteers include information about ADA requirements. Our programs operate in a manner that does not discriminate against people with disabilities. As stated in our staff training and orientation manual, training includes a full explanation of our ADA policies, procedures, and practices. Training is done on an annual basis, and the ADA Coordinator has the overall responsibility for ensuring that all staff are trained, including new employees.

4. *Safety Requirements Assurance*

Safety requirements have been reviewed and it was found that they do not inadvertently discriminate against people with disabilities. Any safety requirements are based on actual risks.

5. *Effective Communication*

It is the policy of the City of Lawrence that effective communication accessibility will be provided for all persons.

The practice of the City of Lawrence is that TTY machines are available at City Hall. TTY training will be provided for all employees, on an annual basis, whose job functions relate to the TTY. Our TTY number will be listed consistently on all our communication where a City of Lawrence phone number is displayed.

6. *Effective Communication Policy*

It is the policy of the City of Lawrence that all documents and publications are available, to anyone who requests them, in accessible formats. These include large print, audiotape, Braille, and computer disc. We use Lowell Association for the Blind, 174 Central Street, Lowell, Massachusetts 01852, and Telephone: 978-454-5704, for our Braille transcription services. For larger volumes of Braille transcription we use the National Braille Press, 88 St. Stephen Street, Boston, MA 02115, Telephone: (617)266-6160 or 1-888-965-8965, fax: (617)437-0456.

The procedure for anyone who requests accessible formats (or any type of effective communication) is:

- A. To specify his / her accessible format either in person, over the phone, or in writing to the ADA Coordinator at least 10 business days in advance of the event.

- B. Within ten (10) business days, the City of Lawrence will provide the format to the requester at no charge.

The Mayor is the staff person who makes undue burden determinations as per our procedures. When we decide what type of aid or service to provide, primary consideration is given to the type of aid or service preferred by the person with a disability.

7. *Interpreter Services Policy and Assistive Listening Devices, etc., Assurances*

It is the policy of the City of Lawrence that sign language interpreters, assistive listening devices, readers, scribes, and other effective communications will be provided for anyone who requests them, in order to participate in any meeting, benefit, or City of Lawrence service.

The procedure for anyone who requests such assistive listening devices and services is:

- A. To specify his/her device or service either in person, over the phone, or in writing to the City of Lawrence ADA Coordinator, Department Director, or Manager.
- B. If the device or service is to be used for a City of Lawrence meeting, the requester will make the request at least 7 days prior to the meeting.
- C. If adequate notice is given, and the service or device cannot be obtained by the City of Lawrence, the Manager will offer the requester the option to postpone the meeting until such can be obtained. City of Lawrence will provide CART (Communication Access Realtime Translation) to our staff and participants when requested. The City of Lawrence will use Beltone Hearing Aid, 209 Chelmsford Street, Lowell, Massachusetts 01851 (978)459-2891.

The Mayor is the staff person who makes undue burden determinations as per our procedures.

8. *Television Captioning and Video Assurance*

It is the policy of the City of Lawrence that audio-visual presentations will be accessible to all individuals with disabilities. Whenever the City of Lawrence provides TV programs, attempts are made to use captioned videos, whenever available. Captioned videos are used when necessary to ensure effective communication.

The procedure for any participant who requests a close caption device or descriptive reading service is:

- A. To specify his / her need either in person, by telephone, or in writing to the ADA Coordinator, Department Head or the Program Manager at least ten (10) business days before the film will be presented.

B. Within ten (10) business days, the City of Lawrence will provide the close caption video and device, or descriptive reading service during the presentation at no cost to the participant. Staff are trained on a regular basis by our Deaf / Hard of Hearing IL Services (DHILS) providers on the use of interpreters, decoders, CART, and other effective communications.

9. *TTY Assurance*

City of Lawrence will have one TTY located in City Hall. Staff will be trained on how to use them on an annual basis. City of Lawrence is in the process of obtaining TTY devices for each of our sites as well as other areas of ADA compliance.

10. *Effective Communication Training Assurance*

Training on all aspects of effective communication is conducted at least annually, and all new staff are trained, as per our staff orientation procedures, on all of the above requirements. All respective staff are familiar with, and have a copy of the City of Lawrence's entire ADA Policies, Procedures, and Practices.

11. *Program Accessibility*

No qualified individual with a disability shall, because the City of Lawrence facilities are inaccessible, be denied the benefit of, be excluded from participation in, or otherwise be subjected to discrimination under any of the City of Lawrence's programs and activities. Each of the City of Lawrence facilities is in the process of being ADA compliant.

12. *ADA Non-Compliance Policies and Procedures General Operating Principles (cont'd)*

City of Lawrence certifies that it has designated the following person as the ADA Coordinator to oversee compliance with policies on nondiscrimination with regards to persons with disabilities. This person's name and the Public Notice of ADA Compliance shall be posted in a prominent location in each of our sites.

Name of ADA Coordinator: Michael R. Sweeney, 978-620-3015.

The City of Lawrence certifies that it has and will continue to take appropriate action to notify the public that it does not discriminate on the basis of disability.

The City of Lawrence certifies that it will use recruitment materials and publications to provide notification of its ADA policy.

The City of Lawrence certifies that it has adopted and implemented a grievance procedure that incorporates appropriate due process standards and that provides for the prompt and equitable resolution of complaints.

13. *Specific Policies and Procedures*

The City of Lawrence informs all of its contractors (during the procurement process) of their obligations to comply with the ADA and Section 504.

It is the policy of the City of Lawrence that all construction and renovations will be completed in accordance with the ADA and regulations of the Massachusetts Architectural Access Board.

It is the policy of the City of Lawrence that the final decision about undue financial and administrative burdens will be made by the Mayor of Lawrence in discussion with the City Council.

It is the policy of the City of Lawrence that individuals with disabilities and other interested persons are closely involved in our ADA self-evaluation process. Comments from the general public, as well as from persons with a wide variety of disabilities are to be solicited.

The process for assuring this close cooperation is for the Mayor and department managers to seek advice and input from students, parents, staff with disabilities, the City of Lawrence ADA coordinator, the local commission on disability, and the Massachusetts Office on Disabilities, etc. Comments from all of these persons and organizations are then included in the self-evaluation and transition plan.

The City of Lawrence hereby adopts these policies and procedures, and they will remain in full effect from the adoption date on.