

# Town of Freetown

## Part B – Evaluation of Nondiscriminatory Policies & Practices in Programs, Services & Activities

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### Introduction

In an effort to provide and maintain compliance with the American with Disabilities Act (ADA), the Town of Freetown 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 Freetown community.

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

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

This report summarizes IHCD’s findings of ADA Title II compliance. The information pertinent to this assessment was obtained by an online ADA questionnaire developed by the Institute for Human Centered Design (IHCD) and submitted by departments from the Town of Freetown, and from the Town’s website. IHCD received eight (8) department questionnaire responses.

This mix of sources constitutes the basis for this compliance assessment report. It is clear that the Town understands many of 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 Freetown 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 35.100 (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 Town of Freetown to implement.

## 1 – Designation of Responsible Employee

Title II of the ADA makes clear that a public entity that employs 50 or more persons 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 Town is in compliance with the ADA.

### Finding

The Town of Freetown has met its obligation to designate a responsible employee by naming the Building Commissioner, Carl Bizarro, as the Town's ADA Coordinator. However, Jeffrey Chandler is still identified as the ADA Coordinator on the Town's ADA Grievance Procedure and ADA Notice [https://www.freetownma.gov/sites/g/files/vyhlf4441/f/uploads/ada\\_grievance\\_procedure\\_-\\_fully\\_executed.pdf](https://www.freetownma.gov/sites/g/files/vyhlf4441/f/uploads/ada_grievance_procedure_-_fully_executed.pdf) , [https://www.freetownma.gov/sites/g/files/vyhlf4441/f/uploads/ada\\_notice.pdf](https://www.freetownma.gov/sites/g/files/vyhlf4441/f/uploads/ada_notice.pdf) . Also, IHCD staff could not find mention on the Town's website of Mr. Bizarro's appointment as ADA Coordinator.

There is some awareness among survey respondents of Mr. Bizarro's role as ADA Coordinator. Of the survey respondents, four (4) out of eight (8) named Mr. Bizarro as the ADA Coordinator; one (1) named Jeff Chandler, one (1) indicated that the town has an ADA Coordinator and two (2) left the question blank.

### Recommendations

The Town should consider providing further clarification for its entire community, including town employees: the name, phone number, email address and scope of responsibilities of the ADA Coordinator(s). In addition to the ADA Notice and ADA Grievance Procedure include for example the ADA Coordinator's contact information on Town's main website, the Human Resources webpage, and Freetown public school webpage, in every building open to the public, on public meeting notices and on social media.

Furthermore, clarification regarding the ADA Coordinator will:

- Make it easier for the Town to be proactive in meeting the needs of members of the public with disabilities;
- Help the Town to develop and articulate a clear vision and mission with regard to members of the public with disabilities;
- Reduce confusion and improve the Town’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 and can identify 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

The Town of Freetown has a Grievance Procedure, which is accessed from the home page, a link Bylaws - Rules & Regulations - Policies & Guidelines under the header “Other”

[https://www.freetownma.gov/sites/g/files/vyhlif4441/f/uploads/ada\\_grievance\\_procedure -  
fully\\_executed.pdf](https://www.freetownma.gov/sites/g/files/vyhlif4441/f/uploads/ada_grievance_procedure_-_fully_executed.pdf) .

However, the Town should take steps to communicate the process(es) to both the community and Town employees in place. Five (5) of the eight (8) survey respondents are aware of the Town’s Grievance Procedure.

### Recommendations

The Town should take steps to clarify its Grievance Procedure for members of the public and Town employees.

IHCD recommends the following:

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- Prominently locate the Grievance Procedure and state the commitment to provide copies in accessible formats upon request on Freetown’s homepage.
- Distribute the Grievance Procedure to all department heads, and post copies of it in noticeable locations in each of the Town’s public buildings.
- Ensure Town employees and the public are aware of the Grievance Procedure process and that Town employees can provide information to members of the public about the process when appropriate.
- Respond to grievances in a timely manner. Ensure and maintain for a reasonable length of time good records of all complaints submitted, including documentation of steps taken towards resolution.

### 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, the Act and this part. (28 CFR Part 35.106)*

#### Findings

The Town of Freetown has an ADA Notice, which is accessed from the home page link, Bylaws - Rules & Regulations - Policies & Guidelines under the header “Other <https://www.freetownma.gov/the-office-of-the-town-clerk/pages/bylaws-rules-regulations-policies-guidelines>. The Town proactively attempted to provide a large print version of the ADA Notice, but the two ADA Notices appear to be identical.

Three (3) survey respondents indicated that the ADA Notice is posted in their buildings. Three (3) respondents indicated that no, the ADA Notice was not posted in their department or not that they were aware of. Two (2) respondents left the question blank.

#### Recommendations

The Town should take steps to clarify the posting requirements of the ADA Notice in compliance with the ADA Title II that states that public entities shall take steps to notify program/service participants, beneficiaries and employees of its obligations. Furthermore, by adopting a uniform policy, the Town has an opportunity to share the positive steps it is taking toward inclusion of all citizens. For example,

the Town informs the community about upcoming meetings and other happenings through the Town's website, meeting agendas, and social media. These communications are opportunities to include a short ADA Notice of Nondiscrimination.

IHCD recommends:

- Publish the ADA Notice in materials and communications distributed by the Town (e.g., reports, contracts, agendas, meeting notes, applications, social media, "Senior Profile" and other newsletters etc).
- Post copies in public locations in the Town's municipal buildings.
- Distribute the ADA Notice to all department heads. Copies should also be provided in alternate formats, to any person upon request.
- Post the ADA Notice on the Town's website homepage and the school district webpage.
- Update and include the ADA Coordinator's name, title, address, telephone number and email address on materials and publications that contain general information disseminated to staff and members of the public.

#### **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 32.100 (b)(7))*

#### **Findings**

From the responses to the ADA questionnaire, although some of the respondents are aware of the ADA Grievance Procedure and ADA Notice, respondents are not aware of a formal process nor have most departments developed a department-specific reasonable modification process. However, staff are able and willing to assist community members as needed.

#### **Recommendations**

The Town should develop written policies and procedures for providing reasonable modifications to ensure compliance with the ADA.

IHCD recommends:

- Ensure that Town employees can provide information to members of the public about the process of requesting reasonable modification of policies when appropriate.
- Update and 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.
- Post the process for requesting reasonable modifications on the Town's website and school district webpage.
- Develop written policies and procedures that address maintaining or providing an accessible route to and through temporary events. Examples include ensuring that an accessible route is provided around construction sites, to and throughout temporary Town events/festivals, to and through accessible voting venues, around outdoor dining, after a snow storm and a method to deal with objects such as cars and trash cans that become fixtures on the sidewalks blocking the accessible route. This is a non-exhaustive list. Consider creating a reporting mechanism for citizens to report issues as they arise and a method for the town to address the reported issue in a timely manner.
- Ensure staff is trained to provide assistance upon request.  
IHCD, through its New England ADA Center, can provide a training for the Town of Freetown on the Town's ADA obligations, including the administrative requirements and providing reasonable modifications. This training would be appropriate for department heads and public-facing Town staff. It would build confidence about rights and responsibilities and build capacity within the Town 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 35.100 (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

Several programs within the Town of Freetown have eligibility criteria. To vote or attend Freetown Public Schools, citizens must be residents of the Town. Also, certain programs have income retractions or age restrictions. These requirements might be necessary for the provision of the service, program or activity, and are 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

The Town of Freetown has Grievance Procedure and ADA Notice

[https://www.freetownma.gov/sites/g/files/vyhlif4441/f/uploads/ada\\_grievance\\_procedure\\_-\\_fully\\_executed.pdf](https://www.freetownma.gov/sites/g/files/vyhlif4441/f/uploads/ada_grievance_procedure_-_fully_executed.pdf) , [https://www.freetownma.gov/sites/g/files/vyhlif4441/f/uploads/ada\\_notice.pdf](https://www.freetownma.gov/sites/g/files/vyhlif4441/f/uploads/ada_notice.pdf).

The Town can have one Grievance Procedure and one ADA Notice to serve the needs of both the public and Town employees or two Grievance Procedures and two ADA Notices to serve the needs of each group. However, the Town must communicate the process(es) to both the community and Town employees.

The Town also includes an Equal Opportunity statement on job postings:

“The Town of Freetown Is an Equal Opportunity Employer. It is the policy of the Town of Freetown to afford equal employment opportunity to qualified persons regardless of race, color, religion, national origin, age military status, sexual orientation, disability, or gender, except where age or gender is a bona fide occupational qualification as allowed by the Civil Rights Act of 1966.”

Four (4) of the eight (8) survey respondents indicated that their department has adopted a nondiscrimination policy; two (2) survey respondents indicated that their department has reasonable

accommodation policies in place; but only one (1) survey respondent indicated that there are policies on nondiscrimination in selection criteria and the administration of test in place. Three (3) respondents left the questions about employment policies blank.

### Recommendations

- Clearly provide information on who to contact regarding reasonable accommodation requests for job applicants and municipal employees on the Human Resources webpage.
- Review and update job descriptions with a focus on identifying essential and marginal tasks. For example, one of the more controversial job requirements is a driver's license which is only sometimes essential. Often a person with a disability can do their job or to get to work on time without a driver's license. If this is the case, the driver's license requirement should be removed from the job description. The focus should be on whether the applicant can complete the task with or without reasonable accommodation.
- IHCD recommends that Town of Freetown employees familiarize themselves with the excellent free national resource from the Job Accommodation Network (JAN) (<https://askjan.org>).

## **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 Town'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 35.100 (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 a service counter in the Town 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 which auxiliary aid is appropriate should evolve from a consultation between the ADA Title II entity (Town of Freetown) 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 Town of Freetown 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 Town 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

There is no evidence that the Town has failed to provide effective communication when required, but from the department responses, it seems that clarifying procedures for providing effective communication could be beneficial. Several respondents indicated a willingness to work with a community member as needed by reading materials to people who are blind. On the other hand, respondents also indicated that the state forms and information on the website is what they have available.

Some of the videos that IHCD reviewed have captions or auto generated captions. Captions always need to be edited for accuracy.

### Recommendations

The Town should maintain and publicize clear processes for members of the public and employees to request auxiliary aids and services.

IHCD recommends:

Distribute the Effective Communication notice to all department heads. Publish it in a local newspaper of general circulation serving the Town; in all materials regarding the Town's programs, services or activities and on the Town's homepage, meeting notice and social media. Copies should also be posted in prominent locations in the Town'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. A “qualified” interpreter is 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.
- 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 should 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 Town’s website.
- In determining what type of auxiliary aid or service is necessary to comply with Title II of the ADA, the Town 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 Town of Freetown 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 Town can demonstrate that another equally effective means of communicating is available.
- Ideally, the Town 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 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 Town of Freetown on effective communication that would be appropriate for department heads and public-facing Town staff in order to build confidence about rights and responsibilities and to build capacity within the Town to comply with this important element of the ADA.

**Sample of Effective Communication request:**

“The Town of Freetown 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 Town’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 Town 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/Video calls 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 Town’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).

**Note:** IHCD will be submitting a web accessibility report with recommendation for the Town to implement.

- To address these Information and Communication Technology (ICT) issues, Freetown 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.

- IHCD recommends providing web forms or accessible fillable PDFs for all the forms available on the Town’s website.
- Include captioning for all the videos available on the Town’s website and social media.
- Include alternative text descriptions for all photographs and images available on the Town’s website and social media.
- Provide podcast transcripts upon requests.
- Additionally, under Title II of the ADA, emergency programs, services and activities must be accessible to people with disabilities. Ensure that the Town takes the necessary steps to effectively communicate with people with disabilities and make the emergency plan available on the Town’s website and update the emergency procedure as often as is necessary.

Also, it is the Department of Justice position that police stations provide sign language interpreters in a timely manner when requested.

- 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 a Video Remote Interpreting service.

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

While a review of the Town of Freetown’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 Town'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 Town 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 related to emergency preparedness see the following:

- 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 staff and visitors with disabilities are included in all phases of emergency management planning. When developed, involve the participation of members of the municipal Commission on Disability.

- Ensure that communication with members of the public with disabilities is as effective as communication with any members of the public.
- Make the evacuation procedure available on the Town’s 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):

- 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 (JAN):

- <http://www.askjan.org>

New England ADA Center:

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