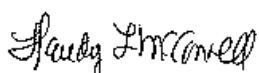


U. S. Department of Labor Employment and Training Administration Washington, D.C. 20210	CLASSIFICATION One-Stop
	CORRESPONDENCE SYMBOL OS
	DATE April 12, 2000

TRAINING AND EMPLOYMENT INFORMATION NOTICE NO. 16-99

TO: ALL STATE WORKFORCE LIAISONS
ALL STATE WORKER ADJUSTMENT LIAISONS
ALL STATE EMPLOYMENT SECURITY AGENCIES
ALL ONE-STOP CAREER CENTER SYSTEM LEADS



For

FROM: LENITA JACOBS-SIMMONS
Deputy Assistant Secretary

SUBJECT: Workforce Investment Act of 1998 Section 188 Interim
Final Rule and Accessibility Checklists for One-Stop
Service Delivery Systems

1. Purpose. To provide information to assist One-Stop service delivery systems in developing accessible infrastructures and programmatic access for people with disabilities.

2. Background. The passage of the Workforce Investment Act of 1998 (WIA) marked the beginning of a new opportunity to develop a coordinated workforce investment system. State and local governments will be able to craft job training programs to meet identified needs within their own economies. Local workforce investment services are to be provided through One-Stop service delivery systems that will have the ability to respond to changing economic conditions within each local workforce investment area.

In addition, State and local governments will be afforded a high level of discretion in the development and implementation of their programs. Although there is increased flexibility in the administration of these programs, there still remains an obligation to assure fair and equitable access to all services, programs and facilities for members of both sexes, various racial and ethnic groups, individuals in differing age groups, and individuals with disabilities. This obligation, along with other obligations relating to nondiscrimination and equal opportunity, is set forth in the regulations (29 CFR part 37) implementing Section 188 of WIA, the statute's provision regarding nondiscrimination.

RESCISSIONS	EXPIRATION DATE Continuing
-------------	-------------------------------

The regulations, published on November 12, 1999, are attached to this TEIN; they will also be found in the Federal Register at 64 FR 61692 *et seq.* Although all of the obligations set forth in the regulations are significant, this TEIN is particularly directed toward those obligations relating to individuals with disabilities.

In a survey conducted by the Harris agency in 1998, it was reported that over 70% of individuals with disabilities were currently unemployed. This troubling situation exists in an economy where unemployment within the general population is at an all time low. Employers are finding it difficult to hire qualified employees and are looking to the workforce investment system to help meet their labor force requirements. As a result there will be an increased demand on One-Stop systems to serve people with disabilities. Although agencies that provide Vocational Rehabilitation services are required partners in One-Stop delivery systems, the section 188 regulations provide that it is unlawful for One-Stop delivery systems, including comprehensive Centers, to rely on such agencies alone to provide services to individuals with disabilities. Indeed, One-Stop delivery systems have an affirmative obligation under various nondiscrimination laws and regulations to administer their programs "in the most integrated setting appropriate to the needs of qualified individuals with disabilities"; this means that One-Stop delivery systems may not *require* such individuals to participate in special programs such as Vocational Rehabilitation programs, but must offer them the opportunity to participate in the same programs and activities as they offer to individuals without disabilities. (See, e.g., 29 CFR 37.7(d).)

The Department of Labor is committed to ensuring that the programs, services, and facilities of each One-Stop delivery system are accessible to all of America's workers, including individuals with disabilities. In a speech before the National Council on Independent Living (NCIL) in June, 1999 Secretary of Labor Alexis Herman stated, " ... I am sending this message from the top: One Stops were created for all people. And that means... people with disabilities." in addition she remarked that " ... the key to keeping the economy strong is tapping into the potential of every American... when Americans with disabilities lose out on opportunity, all of us do."

This TEIN has been prepared jointly by ETA and the Civil Rights Center (CRC). CRC is the agency within the Department of Labor charged with enforcing the various civil rights laws to which recipients of financial assistance from the Department are subject. This includes Section 504 of the Rehabilitation Act of 1973 as amended (Section 504), 29 U.S.C. 794.

3. Description. As noted in the Background section of this TEIN, on November 12, 1999, the Department of Labor published, at 29 CFR part 37, regulations that implement section 188 of WIA. The regulations provide significant guidance on the obligations of each One-Stop delivery system regarding nondiscrimination and equal opportunity for individuals with disabilities. Additionally, the regulations explain that these obligations extend to all programs and activities that are part of One-Stop delivery

systems and that are operated by One-Stop delivery system partners listed in Section 121(b) of WIA, to the extent that the programs and activities are being conducted as part of the One-Stop delivery system. 29 CFR 37.2(a)(2). The regulations also provide definitions for such terms as *qualified individual with a disability*, *qualified interpreter*, and *reasonable accommodation* (29 CFR 37.4), and outline both discriminatory practices (29 CFR 37.7) and affirmative responsibilities for providing reasonable accommodation for, and communicating effectively with, individuals with disabilities.

In addition to Section 188 and its implementing regulations, One-Stop delivery systems are also obliged to comply with Section 504 of the Rehabilitation Act of 1973 as amended, and various titles of the Americans with Disabilities Act (ADA), 42 U.S.C. 12101 *et seq.*, regarding the accessibility of programs and facilities. To assist One-Stop delivery systems in evaluating the accessibility of their programs, services and facilities, in meeting these obligations, we are attaching the following accessibility checklists:

- Customer Service/Accommodation Practices
- Existing Facilities Self Evaluation
- Software Accessibility
- Web Page Accessibility
- Information Transaction Machines (ITMs) Accessibility
- Information Technology Equipment

These checklists will enable each local workforce investment area to conduct self evaluations of the accessibility of its One-Stop delivery system's programs, services and facilities, and to plan to meet the accessibility needs of individuals with disabilities seeking to use those programs, services, and facilities. The checklists are essentially a management tool that will help local workforce investment areas to assess what they have already done to provide access for individuals with disabilities and to plan what needs to be done in the future. The self evaluation will capture both the strengths and weaknesses, and will allow local workforce investment areas to develop concrete plans, based on real data, to increase the level of accessibility in their programs, services and facilities.

A more comprehensive assessment tool along with detailed technical assistance will be available to One-Stop delivery systems later in the year 2000 in the form of a One-Stop delivery system guide to accessibility. In the interim, the attached Facilities and Customer Service/Accommodation self assessments, and accompanying checklists may be used as a tool in assessing the accessibility of the One-Stop delivery system programs and activities you are implementing.

4. Distribution and Use of Regulations Implementing Section 188 and the Accessibility Checklists. 29 CFR part 37, the Existing Facilities Self Evaluation Checklist, Customer Satisfaction/Accommodation Practice checklist, and the four technology accessibility checklists are also available on the disAbility Online website at <http://wdsc.org/disability>.

5. Action Required. States are requested to distribute copies of this TEIN, with attachments, to each One-Stop delivery system within the State, to each of their open One-Stop Career Centers, and to provide a copy to each of their developing Centers. States are also encouraged to share this TEIN with other workforce development partners.

6. Inquiries. Questions regarding the nondiscrimination regulations should be directed to your State or local WIA EO Officer or to the Civil Rights Center, 202-219-8927 (voice) or (202) 219-6118 or (800) 326-2577 (TTY/TDD) or to Jim Downing, 202-219-5500. Questions regarding other matters should be directed to your ETA Regional Office.

7. Attachments.

29 CFR Part 37

One Stop Disability Access Checklist

Software Accessibility Checklist

Web page Accessibility Checklist

ITM Accessibility Checklist

IT Equipment Accessibility Checklist

The One-Stop Disability Access Checklist: Determining Accessibility in Facilities and Provision of Services

The information and survey contained in this document will enable most One-Stop Career Centers to do the required self-evaluations and to plan to meet the accessibility needs of customers with disabilities who come to One- Stop Career Center's for services.

Accessibility is an on-going process. Technology, standards, and needs are constantly changing. Architectural accessibility codes of twenty years ago were a few pages long. Today, most codes are well over a hundred pages. Rather than look at this process as a static one, view it as an on-going process that is as much a part of your system building as staff development, budgeting and organizational development might be.

The attached checklist will enable your One-Stop Career Center to conduct a thorough self-evaluation and transition plan. Consider it a management tool that will help you to assess what you have already done to facilitate equal opportunity for people with disabilities and to plan what needs to be done in the future. The checklist addresses requirements of Section 504 of the Rehabilitation Act of 1973, as amended as well as those under the Americans with Disabilities Act.

The purpose of a self-evaluation is to allow you to gather information regarding your organization's level of accessibility in one place and at one time. A good self-evaluation will capture your strengths and weaknesses. It will allow you to develop a concrete plan, based on real data, to increase the level of accessibility in your program.

A transition plan accomplishes the same goals in terms of architectural accessibility. A good transition plan will identify priorities for barrier removal and will assist you in developing an annual plan continuing to do so.

In developing these tools, we have tried to simplify complex issues while maintaining the integrity of the goal of accessibility and the requirements of the law. Questions regarding specific situations for specific programs will arise and should be expected. Call your appropriate State DOL agency or local agency resource for additional information.

Developing Career Centers that are totally accessible to people with disabilities is critical for many reasons. By the year 2000, one in five Americans will have some type of disability due partly to the aging of our population. More significantly, for those of working age, is that people are surviving illness and injury at far greater numbers and expecting to resume work in some form. Societal attitudes have changed toward greater acceptance of workers with disabilities than previously. Yet, people with disabilities report widespread unemployment or underemployment. Citizens with disabilities not working are estimated to be a the 70 percent level.

As the One-Stop Career Centers reach advanced levels of integration with a broad group of agencies, the system will be expected to serve the full range of the American population -- from early teens to the elderly. Increasing numbers of people with disabilities will be coming to the One-Stop System as we become a significant part of service delivery in employment, training and educational services.

In order to better serve customers with disabilities, it is necessary to involve the disability community in your planning and development process. Begin by contacting disability organizations. If you need assistance in identifying your local organizations, please contact Jim Downing at 202-693-3821, or e-mail: jdowning@doleta.gov. The checklist is designed to be self-guiding. The point is to successfully be able to serve customers with disabilities and attract those customers.

Customer Service/Accommodation Practices

The following portion of the checklist reviews recommended customer service and accommodation practices for Department of Labor One Stop Center programs. Not only does it outline what you are required to do, but is also asks you to evaluate your efforts to date and provides helpful hints.

The One-Stop Team recommends the following steps be taken:

- **Completion of this checklist**
- **Development of internal action steps to rectify issues identified as a result**
- **Development of written organization wide policies**
- **Maintenance of this self-evaluation and supporting/resulting documents on file**
- **Annual review of this self-evaluation**

There may be terminology that you do not understand. Please refer to the end of the checklist for an explanation of the question and the terminology. If you have additional questions, please call your State DOL agency for clarification.

1. Has your One-Stop program affirmatively sought to serve qualified individuals with disabilities? Yes No

- **a. What steps have been taken to meet this goal?**
- **b. Have you been successful?**
- **c. How do you know?**

2. Do you have a written policy concerning discrimination on the basis of physical or mental disability? Yes No

3. Do you regularly review your service practices (advertising, notices signage, building and program access) to be certain that you, your managers, supervisors, or external consultants are nondiscriminatory in the treatment of customers with disabilities? Yes No

Employment Practices under the Americans with Disabilities Act Guidelines:

1. Medical records must be kept in a separate location -medicalrecords. Access to medical records must be limited. Are all Membfromnoners' non-medical records kept in a separate place from records that contain medical information? (Medical information includes insurance application forms as well as health certificates, results of physical exams, etc.) Yes No

- a. Do you have a written policy regarding who has access to medical information?**
- b. What is the policy? (A copy should be attached here.)**

2. Do your employee recruitment materials, including photos and ad copy, contain positive images of persons with disabilities and indicate your program's commitment to inclusion of

persons with disabilities? Yes No

3. Are inquiries related to the presence of a disability or the possible presence of a disability that someone may have, limited to performance of essential functions of the job and requirements for reasonable accommodations?

- **a. Are supervisory staff aware of what constitutes legal and illegal inquiries? Yes No**
- **b. If 'yes', how did they obtain this information? Describe. For example, did they participate in a training session? Read relevant literature? etc.**
- **c. Have job descriptions been analyzed to determine which functions of a job are 'essential' and which are 'marginal'? Yes No**

If "yes", describe the process for doing this.

- **d. Are job descriptions in writing? Yes No**
- **e. Are any of the following questions asked during the application process?**
 - **Health or physical condition? Yes No**
 - **Physical or mental problems or disabilities? Yes No**
 - **Medical history? Yes No**
 - **Previous workers' compensation claims? Yes No**
 - **Prior health insurance claims? Yes No**
 - **Past drug use or substance abuse? (NOTE: The ADA requires that these types of employment questions no longer be used. Consider ADA training in interviewing.) Yes No**

4. Do you require that applicants for employment take any of the following tests as part of the application process?

- **a. Drug or alcohol test? Yes No**
- **b. HIV tests? Yes No**
- **c. Skill or performance tests? Yes No**
- **d. Psychological tests? Yes No**
- **e. Intelligence tests? Yes No**

5. Do you have a substance abuse policy? Yes No

6. Do you have a drug testing policy? Yes No

It is required that reasonable accommodation be provided to employees and customers with disabilities. Reasonable accommodation includes a broad range of adaptations to the manner or

circumstances in which a service activity is performed, an interview is conducted, etc.

Reasonable accommodation might include:

- **Allowing an individual with a psychiatric disability to periodically leave early or arrive late and later make up that time;**
- **Making structural modifications to accommodate a participant who uses a wheelchair;**
- **Providing auxiliary aids and services including sign language interpreters, readers (for people who don't read print due to a disability) or providing material in alternative format such as Braille, ASCII disk, etc.**

7. Regarding reasonable accomodation:

- **a. Have employees and applicants been informed that they are entitled to reasonable accommodations? Yes No**
- **b. If 'yes', how have they been so informed?**
- **c. Are reasonable accommodations provided to Department of Labor One-Stop Center program employees, applicants and customers with disabilities? Yes No**
- **d. How do you know?**
- **e. Has a reasonable written accommodations policy been developed? (A copy should be attached.) Yes No**
- **f. Do supervisory staff know how to proceed if an accommodation is requested? Yes No**
- **g. Has a specific supervisory staff member been designated to coordinate reasonable accommodation, including determining when an accommodation is or is not reasonable and when a funding request will be made ? (Note: This is not required, but is recommended.) Yes No**
- **h. Do they know how to secure a sign language interpreter if necessary? Yes No**
- **i. Do they know how to get material transcribed into Braille, recorded on audio cassette, or placed on ASCII diskette? Yes No**

8. Are, as a matter of policy, interviews, staff meetings and other gatherings held in accessible locations? (Accessible locations include accessible entrances, meeting areas, and rest rooms.) Yes No

9. Are off-site staff trainings, holiday parties, picnics or other gatherings held in accessible locations? Yes No

10. Are reasonable accommodations, including sign language interpreters, written materials in alternative format, etc. provided to individuals with disabilities at off-site meetings, trainings, and social events? Yes No

EXISTING FACILITIES CHECKLIST

A. Priority 1:

Accessible Entrance People with disabilities should be able to arrive on the site, approach the building, and enter the building as freely as everyone else. At least one path of travel should be safe and accessible for everyone, including people with disabilities.

Path of Travel:

- 1. Is there a path of travel that does not require the use of stairs? Yes No**
- 2. Is the path of travel stable, firm and slip-resistant? Yes No**
- 3. Is the path at least 36 inches wide? Yes No**
- 4. Can all objects protruding into the path be detected by a person with a visual disability using a cane? (Note: In order to be detected using a cane, an object must be within 27 inches of the ground. Objects hanging or mounted overhead must be higher than 80 inches to provide clear head room. It is not necessary to remove objects that protrude less than 4 inches from the wall.) Yes No**
- 5. Do curbs on the pathway have curb cuts at drives, parking, and drop-offs? Yes No**

Ramps:

- 6. Are the slopes of ramps no greater than 1:12? (Note: Slope is given as a ratio of the height to the length. 1:12 means for every 12 inches along the base of the ramp, the height increases one inch. For a 1:12 maximum slope, at least one foot of ramp length is needed for each inch of height.) Yes No**
- 7. Do all ramps longer than 6 feet have railings on both sides? Yes No**
- 8. Are railings sturdy, and between 34 and 38 inches high? Yes No**
- 9. Is the width between railings at least 36 inches? Yes No**
- 10. Are ramps non-slip? Yes No**
- 11. Is there a 5-foot-long level landing at every 30-foot horizontal length of ramp, at the top and bottom of ramps and at switchbacks? Yes No**

Parking and Drop-Off Areas:

- 12. Are an adequate number of accessible parking spaces available (8 feet wide for car plus 5-foot striped access aisle)? For guidance in determining the appropriate number to designate, the table below gives the ADAAG requirements for new construction and alterations (for lots with more than 100 spaces, refer to ADAAG): Total spaces Accessible 1 to 25 1 space 25 to 50 2**

spaces 51 to 75 3 spaces 76 to 100 4 spaces (Note: Check your state building code for parking requirements. Sometimes state codes are more stringent.) Yes No

13. Are 16-foot-wide spaces, with 98 inches of vertical clearance, available for lift-equipped vans? (At least one of every 8 accessible spaces must be van-accessible.) Yes No

14. Are the accessible spaces closest to the accessible entrance? Yes No

15. Are accessible spaces marked with the International Symbol of Accessibility? Are there signs reading "Van Accessible" at van spaces? International Symbol of Accessibility: Yes No

16. Is there an enforcement procedure to ensure that accessible parking is used only by those who need it? Yes No

Entrance:

17. If there are stairs at the main entrance, is there also a ramp or lift, or is there an alternative accessible entrance? (Do not use a service entrance as the accessible entrance unless there is no other option.) Yes No

18. Do all inaccessible entrances have signs indicating the location of the nearest accessible entrance? Yes No

19. Can the alternate accessible entrance be used independently? Yes No

20. Does the entrance door have at least 32 inches clear opening (for a double door, at least one 32-inch leaf)? Yes No

21. Is there at least 18 inches of clear wall space on the pull side of the door, next to the handle? (A person using a wheelchair needs this space to get close enough to open the door.) Yes No

22. Is the threshold level (less than 1/4 inch) or beveled, up to 1/2 inch high? Yes No

23. Are doormats 1/2 inch high or less, and secured to the floor at all edges? Yes No

24. Is the door handle no higher than 48 inches and operable with a closed fist? (The "closed fist" test for handles and controls: Try opening the door or operating the control using only one hand, held in a fist. If you can do it, so can a person who has limited use of his or her hands.) Yes No

25. Can doors be opened without too much force (maximum is 5 lbf)? You can use a fish scale to measure the force required to open a door. Attach the hook of the scale to the doorknob or handle. Pull on the ring end of the scale until the door opens, and read off the amount of force required. If you do not have a fish scale, you will need to judge subjectively whether the door is easy enough to open... Yes No

26. If the door has a closer, does it take at least 3 seconds to close? Yes No

Emergency Egress:

**27. Is there sufficient lighting for egress pathways such as stairs, corridors, and exit routes? Yes
No**

B. Priority 2:

Access to Goods and Services Ideally, the layout of the building should allow people with disabilities to obtain goods or services without special assistance. Where it is not possible to provide full accessibility, assistance or alternative services should be available upon request.

Horizontal Circulation:

**1. Does the accessible entrance provide direct access to the main floor, lobby, or elevator? Yes
No**

2. Are all public spaces on an accessible path of travel? Yes No

3. Is the accessible route to all public spaces at least 36 inches wide? Yes No

4. Is there a 5-foot circle or a T-shaped space for a person using a wheelchair to reverse direction? Yes No

Doors:

5. Do doors in public spaces have at least a 32-inch clear opening? Yes No

6. On the pull side of doors, next to the handle, is there at least 18 inches of clear wall space so that a person using a wheelchair can get near to open the door? Yes No

7. Can doors be opened without too much force (5 lbf maximum)? Yes No

8. Are door handles 48 inches high or less and operable with a closed fist? Yes No

9. Are all thresholds level (less than 1/4 inch), or beveled, up to 1/2 inch high? Yes No

Rooms and Spaces:

10. Are all aisles and pathways to all goods and services at least 36 inches wide? Yes No

11. Is there a 5-foot circle or T-shaped space for turning a wheelchair completely? Yes No

12. Is carpeting low-pile, tightly woven, and securely attached along edges? Yes No

**13. In routes through public areas, are all obstacles cane-detectable (located within 27 inches of the floor or protruding less than 4 inches from the wall), or are they higher than 80 inches? Yes
No**

14. Do signs designating permanent rooms and spaces, such as rest room signs, exit signs, and room numbers, comply with the appropriate requirements for accessible signage? Yes No

Controls:

15. Are all controls that are available for use by the public (including electrical, mechanical, window, cabinet, game, and self-service controls) located at an accessible height? (Reach ranges: The maximum height for a side reach is 54 inches; for a forward reach, 48 inches. The minimum reachable height is 15 inches.) Yes No

16. Are they operable with a closed fist? Yes No

Seats, Tables and Counters:

17. Are the aisles between chairs or tables at least 36 inches wide? Yes No

18. Are the spaces for wheelchair seating distributed throughout? Yes No

19. Are the tops of tables or counters between 28 and 34 inches high? Yes No

20. Are knee spaces at accessible tables at least 27 inches high, 30 inches wide, and 19 inches deep? Yes No

Vertical Circulation:

21. Are there ramps or elevators to all levels? Yes No

22. On each level, if there are stairs between the entrance and/or elevator and essential public areas, is there an accessible alternate route? Yes No

Stairs:

23. Do treads have a non-slip surface? Yes No

24. Do stairs have continuous rails on both sides, with extensions beyond the top and bottom stairs? Yes No

Elevators:

25. Are there both visible and verbal or audible door opening/closing and floor indicators (one tone = up, two tones = down)? Yes No

26. Are the call buttons in the hallway no higher than 42 inches? Yes No

27. Do the controls outside and inside the cab have raised and braille lettering? Yes No

28. Is there a sign on the jamb at each floor identifying the floor in raised and braille letters? Yes No

29. Is the emergency intercom usable without voice communication? Yes No

30. Are there braille and raised-letter instructions for the communication system? Yes No

Lifts:

31. Can the lift be used without assistance? If not, is a call button provided? Yes No

32. Is there at least 30 by 48 inches of clear space for a person using a wheelchair to approach to reach the controls and use the lift? Yes No

33. Are controls between 15 and 48 inches high (up to 54 inches if a side approach is possible)? Yes No

C. Priority 3:

Usability of Rest Rooms when rest rooms are open to the public, they should be accessible to people with disabilities. Closing a rest room that is currently open to the public is not an allowable option.

Getting to the Rest Rooms:

1. If rest rooms are available to the public, is at least one rest room (either one for each sex, or unisex) fully accessible? Yes No

2. Are there signs at inaccessible rest rooms that give directions to accessible ones? Yes No

Doorways and Passages:

3. Is there tactile signage identifying rest rooms? (Mount signs on the wall, on the latch side of the door. Avoid using ambiguous symbols in place of text to identify rest rooms.) Yes No

4. Is the doorway at least 32 inches clear? Yes No

5. Are doors equipped with accessible handles (operable with a closed fist), 48 inches high or less? Yes No

6. Can doors be opened easily (5 lbf maximum force)? Yes No

7. Does the entry configuration provide adequate maneuvering space for a person using a wheelchair? (A person using a wheelchair needs 36 inches of clear width for forward movement, and a 5-foot diameter clear space or a T-shaped space to make turns. A minimum distance of 48 inches, clear of the door swing, is needed between the two doors of an entry vestibule.) Yes No

8. Is there a 36-inch-wide path to all fixtures? Yes No

Stalls:

9. Is the stall door operable with a closed fist, inside and out? Yes No

10. Is there a wheelchair-accessible stall that has an area of at least 5 feet by 5 feet, clear of the door swing, OR is there a stall that is less accessible but that provides greater access than a typical stall (either 36 by 69 inches or 48 by 69 inches)? Yes No

11. In the accessible stall, are there grab bars behind and on the side wall nearest to the toilet? Yes No

12. Is the toilet seat 17 to 19 inches high? Yes No

Lavatories:

13. Does one lavatory have a 30-inch-wide by 48-inch-deep clear space in front? (A maximum of 19 inches of the required depth may be under the lavatory.) Yes No

14. Is the lavatory rim no higher than 34 inches? Yes No

15. Is there at least 29 inches from the floor to the bottom of the lavatory apron (excluding pipes)? Yes No

16. Can the faucet be operated with one closed fist? Yes No

17. Are soap and other dispensers and hand dryers 48 inches high or less and usable with one closed fist? Yes No

18. Is the mirror mounted with the bottom edge of the reflecting surface 40 inches high or lower? Yes No

D. Priority 4:

Additional Access When amenities such as public telephones and drinking fountains are provided to the general public, they should also be accessible to people with disabilities.

Drinking Fountains:

1. Is there at least one fountain with clear floor space of at least 30 by 48 inches in front? Yes No

2. Is there one fountain with its spout no higher than 36 inches from the ground, and another with a standard height spout (or a single "high-low" fountain)? Yes No

3. Are controls mounted on the front or on the side near the front edge, and operable with one closed fist? Yes No

4. Does the fountain protrude no more than 4 inches into the circulation space? Yes No

Telephones:

5. If pay or public use phones are provided, is there clear floor space of at least 30 by 48 inches in front of at least one? Yes No

6. Is the highest operable part of the phone no higher than 48 inches (up to 54 inches if a side approach is possible)? Yes No

7. Does the phone protrude no more than 4 inches into the circulation space? Yes No

8. Does the phone have push-button controls? Yes No

9. Is the phone hearing aid compatible? Yes No

10. Is the phone adapted with volume control? Yes No

11. Is the phone with volume control identified with appropriate signage? Yes No

12. Is one of the phones equipped with a telecommunications device for the Deaf? telephone (TT/TTY/TDD)? Yes No

13. Is the location of the TDD identified by accessible signage bearing the International TDD Symbol? Yes No

Help from disability community organizations and advocates:

The One-Stop Access team strongly suggests that your region's disability community leaders be included in the general governance of a One-Stop Center. We have a list of these organizations, on a state-by-state basis, and will provide them to you. Call us for details. This is the list developed by the President's Committee on Employment of People with Disabilities for education and information.



U.S. Department of Justice

Civil Rights Division

Disability Rights Section
P.O. Box 66738
Washington, DC 20035-6738

Software Accessibility Checklist¹

This Checklist should serve as a tool for evaluating the extent to which software applications are accessible to most people with disabilities. This document is based on the U.S. Department of Education's "Requirements for Accessible Software Design," including the technical guidance that appears as *Appendix A* to the "Requirements." The "Requirements" document and the appendix are available at:

<http://ocfo.ed.gov/coninfo/clibrary/software.htm>

More specific recommendations for how to design accessible software can be obtained from Joe Tozzi or others on the Assistive Technology Team in the Department of Education's Office of the Chief Information Officer Technology Center, (202) 708-7298 (voice), (202) 401-8510 (TTY), Internet: Joe_Tozzi@ed.gov.

Although the Department of Education's guidelines may differ from the legally-enforceable standards that the Access Board will promulgate by February 7, 2000, they are among the most helpful references currently available to assist your agency in determining the extent to which your software applications are accessible to and useable by persons with disabilities.

When evaluating your software applications, be sure to test them under the same circumstances under which employees or members of the public with disabilities would be using them. For instance, if you use off-the-shelf software on a network environment, test the software on the same network, not in a stand-alone environment.

NOTE: In addition to filling out this "Software Accessibility Checklist," you must also test each

¹For persons with disabilities, additional copies of this document are available on computer disk and in alternate formats including large print, Braille, and audio cassette, by calling the U.S. Department of Justice at the following numbers:

Section 508 Coordinators: **1-202-305-8304** (voice)
1-202-353-8944 (TTY)

ADA Information Line: **1-800-514-0301** (voice)
1-800-514-0383 (TTY)

Alternate format copies for persons with disabilities may also be requested via e-mail to:
sec508.questions@usdoj.gov

This document is available on the Section 508 Home Page of the Civil Rights Division, U.S. Department of Justice:

<http://www.usdoj.gov/crt/508>

Software Accessibility Checklist

page 2 of 5

application by running it with assistive technologies commonly used by persons with disabilities, including, at a minimum, screen readers, and, if possible, alternate input devices, screen enlargement software, and voice recognition software and devices. Make a note of any problems encountered during this exercise in the space provided on page 5.

Person filling out this Checklist:

Component/Agency: _____

Name: _____

Title: _____

Telephone: _____

Fax number: _____

E-mail address: _____

Software application under review:

Title/Version: _____

Developer (give full name, no acronyms): _____

Customization: choose the most appropriate description:

- (a) commercial off-the-shelf software (used "as is")
- (b) commercial software, but modified for agency use
- (c) custom software developed under contract
- (d) custom software developed in-house

Description: choose the most appropriate:

- (a) word processor
- (b) spreadsheet
- (c) database
- (d) groupware
- (e) e-mail
- (f) Internet browser
- (g) other Internet access
- (h) online database access
- (i) other (describe): _____

Used by approximately ____ members of the public and ____ Federal employees on a weekly basis.

Software Accessibility Checklist

page 3 of 5

Category	Question	Y	N	N/A
Keyboard Access	1. Does the software provide keyboard equivalents for all mouse actions, including buttons, scroll windows, text entry fields, and pop-up windows?			
Keyboard Access	2. Does the program provide clear and precise instructions for use of all keyboard functions as part of the user documentation?			
Keyboard Access	3. Are instructions regarding keyboard use widely available for all users in your component?			
Keyboard Access	4. Does the software have a logical tabbing order among fields, text boxes, and focal points?			
Keyboard Access	5. When navigating screens and dialog boxes using the keyboard, does the focus follow a logical tabbing order?			
Keyboard Access	6. Is there a well-defined focal point that moves with keyboard navigation? (e.g., can you use the arrow keys to navigate through a list followed by pressing the ENTER key or space bar to select the desired item)?			
Keyboard Access	7. Are shortcut keys provided for all pull-down menus?			
Keyboard Access	8. Does the software support existing accessibility features built into the operating system (e.g., sticky keys, slow keys, repeat keys in Apple Macintosh OS or Microsoft Windows 95)?			
Timing	9. If timed responses are present, does the software allow the user to modify the timing parameters of any required timed responses?			
Screen Elements	10. Are all descriptions or labels for fields positioned immediately to the left or directly above the control, and do they end in a colon, so that it is easy for screen reading software to associate the labels with the corresponding fields?			
Screen Elements	11. Does every window, object, and control have a clearly named label?			

Any "no" answer may indicate a problem with accessibility.

Software Accessibility Checklist

page 4 of 5

Category	Question	Y	N	N/A
Screen Elements	12. Does the software application use standard controls rather than owner-drawn or custom controls?			
Icons	13. Does the software have a user selectable option to display text on icons, <u>i.e.</u> , text only icons or bubble help?			
Icons	14. Is the use of icons consistent throughout the application?			
Icons	15. Are menus with text equivalents provided for all icon functions or icon selections on menu, tool, and format bars?			
Sounds	16. If there are audio alerts, are visual cues also provided? Note: Most operating systems handle this issue in the client/server environment; the question is most relevant in a dumb terminal environment .			
Sounds	17. Does the software support the "show sounds" feature where it is built into the operating system?			
Sounds	18. Can the user disable or adjust sound volume?			
Sounds	19. If information is provided in an audio format, is it also capable of being displayed by the user in a visual format?			
Display	20. Is the software application free of patterned backgrounds used behind text or important graphics?			
Display	21. Can a user override default fonts for printing and text displays?			
Display	22. Can a user adjust or disable flashing, rotating, or moving displays?			
Color	23. Does the software ensure that color-coding is never used as the only means of conveying information or indicating an action?			
Color	24. Does the application support user-defined color settings system-wide?			

Any "no" answer may indicate a problem with accessibility.



U.S. Department of Justice

Civil Rights Division

*Disability Rights Section
P. O. Box 66738
Washington, DC 20035-6738*

Web Page Accessibility Checklist¹

This Checklist should help you evaluate the extent to which Web pages are accessible to most people with disabilities.

This Checklist is based on the September 18, 1998 Working Draft of the Web Content Accessibility Guidelines ² of the World Wide Web Consortium's ("W3C") Web Accessibility Initiative ("WAI"). W3C/WAI guidelines are the result of a compilation and technical upgrading of a number of different Web accessibility guidelines from around the world. They are developed by a consensus process through a W3C working Group involving Web industry, disability organizations, research organizations, and governmental organizations.

More information about the WAI and its products is available at: <http://www.w3.org/WAI>.

The status of this Checklist's source material as a W3C Working Draft indicates that it is a draft document and may be updated, replaced or made obsolete by other documents at any time. The status as a W3C Working Draft means that one should not imply endorsement by, or the consensus of, either W3C or members of the WAI Working Group. Likewise, the Department of Justice's Web Page Accessibility Checklist has not been adopted, endorsed by, or in any way approved by the WAI, W3C, or any component.

¹For persons with disabilities, additional copies of this document are available on computer disk and in alternate formats including large print, Braille, and audio cassette, by calling the U.S. Department of Justice at the following numbers:

Section 508 Coordinators: **1-202-305-8304** (voice)
 1-202-353-8944 (TTY)

ADA Information Line: **1-800-514-0301** (voice)
 1-800-514-0383 (TTY)

Alternate format copies for persons with disabilities may also be requested via e-mail to:
sec508.questions@usdoj.gov

This document is available on the Section 508 Home Page of the Civil Rights Division, U.S. Department of Justice:

<http://www.usdoj.gov/crt/508>

²"The Web Content Accessibility Guidelines" were formerly known as the "Page Author Guidelines."

Web Page Accessibility Checklist

page 2 of 4

The W3C Working Draft of the Web Content Accessibility Guidelines can be found at:

<http://www.w3.org/TR/1998/WD-WAI-PAGEAUTH-19980918>

Users are strongly encouraged to go to that site for guidance on the appropriate use of and context for the information contained in this Checklist. The most updated version of the W3C Working Draft of the Web Content Accessibility Guidelines can be found at:

<http://www.w3.org/TR/WD-WAI-PAGEAUTH>.

Use of the W3C guidelines does not constitute an endorsement of the organization or its materials by the U.S. Department of Justice. **The WAI's Web Content Accessibility Guidelines may differ from the legally-enforceable standards that the Access Board will promulgate by February 7, 2000.** The Department of Justice is providing this information only as interim guidance while the Access Board develops the binding standards.

Person filing out this Checklist:

Component/Agency: _____

Name: _____

Title: _____

Telephone: _____

Fax number: _____

E-mail address: _____

Web page under review:

URL/URI/other identifier: _____

Indicate the most appropriate description for the web page:

- (a) online form for services or benefits
- (b) other online form
- (c) instructions for receipt of services or benefits
- (d) description of activities
- (e) employment postings
- (f) inherently graphical content (e.g., map or photograph)
- (g) other (describe): _____

Estimate the average number of times the page is accessed on a weekly basis: _____

Web Page Accessibility Checklist

page 3 of 4

Question	Y	N	N/A
1. For all images, is alternative text provided? Note. <i>This includes images used as spacers, bullets in lists, and links</i>			
2. For all applets, are alternative text and content provided?			
3. For all image map links, is alternative text provided?			
4. If server-side image maps were used, are text links provided for each hotspot in the image map?			
5. For all graphical buttons, is alternative text provided?			
6. Is there an absence of ASCII art, and, instead, are images and alternative text used? E.g. , use "smile" or an image with alt text instead of: :)			
7. If OBJECT was used to incorporate an image, applet, or script into a page, is the information also conveyed in an alternative means in cases where the OBJECT cannot be perceived, such as with "title" or within the body of the OBJECT element?			
8. Are long descriptions provided of all graphics that convey important information? To do so: use "longdesc." Until most browsers support "longdesc," also use a d-link (description link) or invisible d-link.			
9. For stand-alone audio files, are textual transcripts of all words spoken or sung as well as all significant sounds provided?			
10. For audio associated with video, are captions -- textual transcripts of dialog and sounds -- synchronized with the video?			
11. Where sounds are played automatically, are visual notification and transcripts provided?			
12. For short animations such as animated "gifs" images, are alternative text and a long description provided, if needed?			
13. For movies, are auditory descriptions provided and synchronized with the original audio?			
14. If color is used to convey information, is the information also clear from the markup and/or text? Hint: One way of testing this is to ask yourself whether the information is available if one is viewing it on a black and white screen.			
15. Are foreground and background color combinations used that provide sufficient contrast when viewed by someone with color blindness or when viewed on a black and white screen?			

Any "no" answer may indicate a problem with accessibility.



U.S. Department of Justice

Civil Rights Division

*Disability Rights Section
P.O. Box 66738
Washington, DC 20035-6738*

ITM Accessibility Checklist¹

This Checklist should serve as a tool for evaluating the extent to which Information Transaction Machines -- or "ITM's" -- are accessible to and usable by most people with disabilities. ITM's include, but are not limited to, the following:

- ATM's (automated teller machines);
- ticket vending machines;
- computer kiosks;
- electronic building directories;
- fare machines; and
- point of sale customer card payment systems

This Checklist is partly based on the publication, "User Needs, and Strategies for Addressing Those Needs" (hereinafter, "Strategies") by the Trace Research and Development Center of the University of Wisconsin-Madison, which can be found at:

<http://www.trace.wisc.edu/world/kiosks/itms/needs.html>

The development of the Trace Center's publication was funded by the National Institute on Disability and Rehabilitation Research ("NIDRR") of the U.S. Department of Education under grant number H133E30012. Use of the Trace Center's materials does not constitute an endorsement of the Trace Center or its work by the Department of Justice. Likewise, the Department of Justice's ITM Accessibility Checklist has not been adopted, endorsed by, or in any way approved by the Trace Center, NIDRR, or the Department of Education.

¹For persons with disabilities, additional copies of this document are available on computer disk and in alternate formats including large print, Braille, and audio cassette, by calling the U.S. Department of Justice at the following numbers:

Section 508 Coordinators: **1-202-305-8304** (voice)
1-202-353-8944 (TTY)

ADA Information Line: **1-800-514-0301** (voice)
1-800-514-0383 (TTY)

Alternate format copies for person with disabilities may also be requested via e-mail to:
sec508.questions@usdoj.gov

This document is available on the Section 508 Home Page of the Civil Rights Division, U.S. Department of Justice:

<http://www.usdoj.gov/crt/508>

ITM Accessibility Checklist

page 2 of 4

Note: The Trace Center's "Strategies" may differ from the legally-enforceable standards that the Access Board will promulgate by February 7, 2000.

Person filling out this Checklist:

Component/Agency: _____

Name: _____

Title: _____

Telephone: _____

Fax number: _____

E-mail address: _____

ITM application under review:

Type (choose the most appropriate description):

- (a) automated teller machine (ATM)
- (b) ticket vending machine
- (c) information or computer kiosk
- (d) electronic building directory
- (e) point of sale card payment system
- (f) fare machine
- (g) other —describe: _____

Hardware Manufacturer: _____

Model: _____

Software: _____

Number of units of this model operated or used by component: _____

Used by approximately _____ members of the public and _____ Federal employees on an average weekly basis.

Hours of availability (choose the most appropriate):

- (a) 24 hours a day, seven days a week
- (b) normal business hours, weekdays only
- (c) normal business hours, 7 days a week
- (d) extended business hours, weekdays only
- (e) extended business hours, weekdays and some weekend hours

Question	Y	N	N/A
1. Can the user change sound settings, such as volume?			
2. For all visual information and cues, are there simultaneous corresponding audible information and cues?			
3. Is there sufficient contrast between foreground and background colors or tones so that a person with low vision can use the technology, or is it possible for the user to select foreground and background colors?			

Any "no" answer may indicate a problem with accessibility.

ITM Accessibility Checklist

page 3 of 4

4.	Is all text information displayed large enough that it can be read by someone with low vision, or is it possible for the user to select an enlarged display?			
5.	Can users select speech input?			
6.	If speech input is used, is an alternative method available for inputting information, such as typing on a keyboard or scanning printed material, so that someone who cannot speak can use the technology?			
7.	For all sound cues and audible information, such as "beeps," are there simultaneous corresponding visual cues and information?			
8.	Is there a headphone jack to enable the user to use an assistive listening system to access audible information?			
9.	Can users simultaneously change the visual display settings and the sound settings?			
10.	Can the user read displayed output with a tactile display such as Braille?			
11.	Does the technology allow the user to use scanning input?			
12.	Is the technology manufactured such that it allows a person using a wheelchair to approach the technology, including all controls, dispensers, receptacles, and other operable equipment, with either a forward or parallel approach?			
13.	<p>Is the technology manufactured so that, if the equipment is properly placed, the highest operable part of controls, dispensers, receptacles, and other operable parts fall within at least one of the following reach ranges?</p> <p style="padding-left: 40px;">If a forward approach is required, the maximum high forward reach is 48 inches.</p> <p style="padding-left: 40px;">If a side approach is allowed, and the reach is not over an obstruction, the maximum high side reach is 54 inches; if it is over an obstruction which is no more than 24 inches wide and 34 inches high, the maximum high side reach is 46 inches.</p>			
14.	If electrical and communication system receptacles are provided, are they mounted no less than 15 inches above the floor?			
15.	Are all controls and operating mechanisms operable with one hand and operable without tight grasping, pinching, or twisting of the wrist?			
16.	Is the force required to operate or active the controls no greater than 5 lbf?			

Any "no" answer may indicate a problem with accessibility.



U.S. Department of Justice

Civil Rights Division

*Disability Rights Section
P.O. Box 66738
Washington, DC 20035-6738*

IT Equipment Accessibility Checklist¹

This Checklist should help you evaluate the extent to which your component's information technology equipment (including —but not limited to —printers, fax machines, and copiers) is accessible to and usable by most people with disabilities. You should evaluate each model by each manufacturer, whether or not there is another type of equipment available that is accessible to people with disabilities and whether or not reasonable accommodations are provided to individuals with disabilities.

Person filling out this Checklist:

Component/Agency: _____

Name: _____

Title: _____

Telephone number: _____

Fax number: _____

E-mail address: _____

¹ For persons with disabilities, additional copies of this document are available on computer disk and in alternate formats including large print, Braille, and audio cassette, by calling the U.S. Department of Justice at the following numbers:

Section 508 Coordinators: **1-202-305-8304** (voice)
1-202-353-8944 (TTY)

ADA Information Line : **1-800-514-0301** (voice)
1-800-514-0383 (TTY)

Alternate format copies for persons with disabilities may also be requested via e-mail to:
sec508.questions@usdoj.gov

This document is available on the Section 508 Home Page of the Civil Rights Division, U.S. Department of Justice:

<http://www.usdoj.gov/crt/508>

IT Equipment Accessibility Checklist

page 2 of 3

Equipment under review:

Type (choose one):

- (a) printer
- (b) fax machine
- (c) copier
- (d) other -- describe: _____

Manufacturer: _____

Model: _____

Number of units of this model operated or used by component: _____

Used by approximately _____ members of the public on a weekly basis.

Used by approximately _____ Federal employees on a weekly basis.

Hours of availability (choose the most appropriate):

- (a) 24 hours a day, seven days a week
- (b) normal business hours, weekdays only
- (c) normal business hours, 7 days a week
- (d) extended business hours, weekdays only
- (e) extended business hours, weekdays and some weekend hours

Question	Y	N	N/A
1. Can the user change sound settings, such as volume?			
2. Are any displays—including liquid crystal displays—readable by persons who are in a seated position, such as those who use wheelchairs?			
3. For free-standing equipment, is the highest operable part of controls, dispensers, receptacles, and other operable equipment placed within at least one of the following reach ranges? (a) If a forward approach is required, the maximum high forward reach is 48 inches. (b) If a side approach is allowed, and the reach is not over an obstruction, the maximum high side reach is 54 inches; if it is over an obstruction which is no more than 24 inches wide and 34 inches high, the maximum high side reach is 46 inches.			
4. Are status information and cues that are provided in a visual manner also available in an audible manner for persons with visual impairments?			

Any "no" answer may indicate a problem with accessibility.

IT Equipment Accessibility Checklist

Question	Y	N	N/A
5. For fax machines, does the machine provide line status information (such as notifying the user of a "busy" fax line) in a visual manner (either text display or status lights) for users who are deaf or hard of hearing?			
6. Is the force required to operate or active controls no greater than 5 lbf?			
7. Can users confirm their selections? For instance, if a person has limited fine motor control, such as a person who has a palsy, it is helpful for him or her to have the opportunity to confirm selections —such as "number of copies" selected —before the operation begins.			
8. Are controls and operating mechanisms operable with one hand and operable without tight grasping, pinching, or twisting of the wrist?			
9. Is there a headphone jack for accessing information by users of assistive listening systems?			
10. Are instructions and all information for use accessible to and independently usable by persons with vision impairments, such as with recorded information or Braille labels and directions?			
11. Are there alternate operating mechanisms for persons who cannot use push-style controls? Ex. For instance, are there alternative methods of control —such as voice activation —for routine tasks?			

12. After you have evaluated this equipment using the Checklist, have users with a wide variety of disabilities test it for accessibility. Describe the accessibility successes and problems they encountered during these exercises, including your plans for addressing any problems:

Any "no" answer may indicate a problem with accessibility.