

Georgia ADA Update



A Quarterly Newsletter by the
State ADA Coordinator's Office,
Georgia State Financing and Investment Commission

In This Issue – April 2011

- [Welcome from the State of Georgia ADA Coordinator's Office](#)
- [State of Georgia ADA Coordinator's Office](#)
- [Revised Regulations by DOJ Amend ADA Title II](#)
- [Interacting with People with Disabilities](#)
- [Case Law Update](#)
- [Frequently Asked Questions](#)
- [Resources and Publications from the ADA Coordinator's Office](#)
 - [Additional Resources and Publications](#)
- [Training Opportunities from the ADA Coordinator's Office](#)
 - [Additional Training Opportunities](#)
- [Acknowledgements & Disclaimer](#)

Welcome from the State of Georgia ADA Coordinator's Office

Dear Colleague,

The State ADA Coordinator's Office is pleased to share the inaugural issue of our newsletter with you. The newsletter, developed in conjunction with the DBTAC: Southeast ADA Center, is a quarterly publication created for our colleagues who play a role in ensuring disability access to our state government's programs, services, and activities. We hope you find the newsletter enlightening and full of information that will be helpful to you in your daily work activities.

The past year has been a year of significant change for the Americans with Disabilities Act (ADA). In this issue you will find information regarding the new ADA regulations and building standards, along with case updates and training announcements.

We welcome your input regarding information you would like to have included in future issues and any questions you may have about the ADA.

Please address all inquiries to Stacey Peace, Assistant State ADA Coordinator at stacey.peace@gsfic.ga.gov.

Thank you and we hope you enjoy reading our first issue.

Stacey Peace

Assistant State ADA Coordinator

The State of Georgia ADA Coordinator's Office



The Americans with Disabilities Act, or ADA, provides comprehensive civil rights protections to individuals with disabilities in the areas of employment, private businesses, state and local government services and telecommunications.

At the State of Georgia ADA Coordinator's Office, we are proud to play a vital role in helping state and local government agencies ensure that people with disabilities have access to the programs, services and information offered by the State of Georgia.

Our office provides state agencies the technical support and assistance necessary to implement the requirements of the ADA that apply to their public mission; assists state agencies in updating, strengthening and enhancing the scope of self-evaluation and transition plans to ensure compliance with the ADA mandate; and develops simplified and disability-friendly methods for people with disabilities to access the programs, services and information offered by the State of Georgia; and manages the State Facility Improvement Program.

Is the State ADA Coordinator's Office an enforcement agency?

Our office is not an enforcement agency. However, we do serve as a technical resource to State Agencies and the general public for the ADA's Title II general nondiscrimination requirements, program accessibility, communications and employment (including the reasonable accommodation process), as well as compliance with the State Accessibility Code.

Does the State ADA Coordinator's Office provide ADA-related training?

Our office conducts general and customized training on ADA topics for state agencies and other targeted audiences to ensure appropriate familiarity with the ADA's requirements applicable to State government utilizing various delivery methods. Trainings provided by our office may be "stand-alone" or part of a larger project or technical support request. If you have a specific ADA training request, please contact our office at phone: (404) 657-7313 [voice], TTY: (404) 657-9993, or [email: gaada@gsfic.ga.gov](mailto:gaada@gsfic.ga.gov).

To learn more about the ADA General Requirements, the State of Georgia ADA Coordinator's Office and how we can assist you, visit our website –

ada.georgia.gov.

A free [tutorial on the ADA Title II requirements applicable to State and Local government](#) under the Americans with Disabilities Act (ADA) is available from the ADA National Network by DBTAC.



Source: <http://adacourse.org/title2/>

Additional information, training and technical assistance on Title II of the ADA can be obtained at the ADA Coordinator's Office at ada.georgia.gov or by contacting the DBTAC: Southeast ADA Center at 1-800-949-4232 [voice/tty] or at sedbtac.org.



Revised Regulations by the Department of Justice Amend Title II of the Americans with Disabilities Act

The Department of Justice (DOJ) has amended its regulation implementing Title II of the Americans with Disabilities Act, which applies to public entities. The new regulations take effect on March 15, 2011. Visit the ada.gov website for a summary of some of these changes and [more information and copies of the final regulations and the 2010 ADA Standards for Accessible Design](#).

Source: <http://www.ada.gov/regs2010/ADAregs2010.htm>.

Service Animals

The final rule defines "service animal" as a dog that has been individually trained to do work or perform tasks for the benefit of an individual with a disability. The rule states that other animals, whether wild or domestic, do not qualify as service animals. Dogs that are not trained to perform tasks that mitigate the effects of a disability, including dogs that are used purely for emotional support, are not service animals. The final rule also clarifies that individuals with mental disabilities who use service animals that are trained to perform a specific task are protected by the ADA. The rule also permits the use of trained miniature horses as alternatives to dogs, subject to certain limitations. To allow flexibility in situations where using a horse would not be appropriate, the final rule does not include miniature horses in the definition of "service animal."

Wheelchairs and Other Power-Driven Mobility Devices

The final rule adopts a two-tiered approach to mobility devices, drawing distinctions between wheelchairs and "other power-driven mobility devices." "Other power-driven mobility devices" include a range of devices not designed for individuals with mobility impairments, such as the Segway® PT, but which are often used by individuals with disabilities as their mobility device of choice. Wheelchairs must be permitted in all areas open to pedestrian use. "Other power-driven mobility devices" must also be permitted to be used unless the covered entity can demonstrate that such use would fundamentally alter its programs, services, or activities, create a direct threat, or create a safety hazard. The rule also lists factors to consider in making this determination. This approach accommodates both the legitimate business interests in the safe operation of a facility and the growing use of the Segway® PT as a mobility device by returning veterans and others who are using the Segway® PT as their mobility aid of choice.

Ticketing

The rule provides guidance on the sale of tickets for accessible seating, the sale of season tickets, the hold and release of accessible seating to persons other than those who need accessible seating, ticket pricing, prevention of the fraudulent purchase of accessible seating, and the ability to purchase multiple tickets when buying accessible seating. It requires a venue operator to accommodate an individual with a disability who acquired inaccessible seating on the secondary ticket market only when there is unsold accessible seating for that event.

Detention and Correctional Facilities

The final rule clarifies the requirements that apply to correctional facilities. It requires three percent of newly constructed or altered cells to be accessible. At least one of each type of general holding cells, general housing cells, medical care facilities, and visiting areas must be accessible. In addition, at least one of each type of special holding cells or special housing cells also must be accessible. Also, at least one of each type of central holding cells, court-floor holding cells, and visiting areas in a judicial facility must be accessible.

Judicial Facilities

The final rule requires that each courtroom must be accessible. Jury boxes, witness stands, and jury deliberation areas must be accessible. Judges benches and other employee work stations must be accessible, but raised courtroom work stations are not required to provide ramps or lifts at the time of construction as long as the space has been designed to permit the future addition of a ramp or lift without substantial reconstruction.

Residential Housing Offered for Sale to Individual Owners

Residential housing programs provided by Title II entities are covered by the ADA. For the first time, however, the final rule establishes design requirements for residential dwelling units designed and constructed or altered by public entities that will be offered by sale to individuals. These

units must comply with the requirements for residential facilities in the 2010 Standards including section 233 and 809. This requirement also applies to housing programs where the design and construction of particular residential dwelling units take place only after a specific buyer has been identified. In such programs, the covered entity must provide the units that comply with the requirements for accessible features to those pre-identified buyers with disabilities who have requested such a unit.

Adoption of the 2010 ADA Standards for Accessible Design

The Department of Justice has adopted revised ADA Design Standards that include the relevant chapters of the Access Board's 2004 ADA/ABA Accessibility Guidelines as modified by specific provisions of this rule. To minimize compliance burdens on entities subject to more than one legal standard, these design standards have been harmonized with the Federal standards implementing the Architectural Barriers Act and with the private sector model codes that are adopted by most States.

The rule will become effective on March 15, 2011. On March 15, 2012, compliance with the 2010 Standards will be required for new construction and alterations. In the period between September 15, 2010 and March 15, 2012, covered entities may choose between the 1991 Standards, the Uniform Federal Accessibility Standards (UFAS), and the 2010 Standards. Covered entities that should have complied with the 1991 Standards or the UFAS during any new construction or alteration of facilities or elements, but have not done so by March 15, 2012, must comply with the 2010 Standards.

The rule includes a general "safe harbor" under which elements in covered facilities that were built or altered in compliance with the 1991 Standards or the UFAS would not be required to be brought into compliance with the 2010 Standards until the elements were subject to a planned alteration. Similar safe harbors were adopted for elements associated with the "path of travel" to an altered area.

Information is available from [ada.gov](http://www.ada.gov) about the [final ADA regulations for 2010](#) and the [2010 ADA Standards for Accessible Design](#).

Sources: <http://www.ada.gov/regs2010/ADAregs2010.htm>;
http://www.ada.gov/2010ADASTandards_index.htm.

Interacting with People with Disabilities

People with disabilities ask that you see them as people first and their disability second. Because a person has a disability, he or she may do things differently than an individual without a disability. You may have co-workers with disabilities who may use a large screen monitor or a raised desk to accommodate a wheelchair, or who have a flexible work schedule.

People coming into your agency may need assistance in reading and filling out forms. Or they may need to have materials given to them in different formats, such as Braille, large print, or audio.

When interacting with someone who has a disability, let common sense and courtesy break down any barriers you may encounter. Treat him or her as you would want to be treated.



Basic Points of Etiquette

- Avoid asking personal questions about someone's disability.
- Be considerate of the extra time it might take for a person with a disability to do or say something.
- Be polite and patient when offering assistance, and wait until your offer is accepted. Listen or ask for specific instructions.
- When introduced to a person with a disability, it is appropriate to offer to shake hands. People with limited hand use or who wear an artificial limb can usually shake hands. (Shaking hands with the left hand is an acceptable greeting.) A smile along with a spoken greeting is also always appropriate.
- Speak directly to the person with a disability, not just to the person who may be accompanying him or her.
- Treat adults as adults. Do not patronize or talk down to people with disabilities.
- Be patient and give your undivided attention, especially with someone who speaks slowly or with great effort.
- Never pretend to understand what a person is saying. Ask the person to repeat or you can rephrase what was said and ask if that is correct. You can also offer a pen and paper.
- Do not pet or distract a service animal. The dog is responsible for its owner's safety and is always working. It is not a pet.

Additional [suggestions for interacting with people who have disabilities](#) can be found on the State of Georgia ADA Coordinator's website, as well in the Frequently Asked Questions section of this newsletter.

Source:

http://ada.georgia.gov/00/channel_modifieddate/0,2096,77499621_102056196,00.html

Case Law Update

Each issue of this newsletter will provide summaries of relevant court cases affecting State and local government agencies in the Southeast Region.



**Edison v. Douberly,
604 F.3d 1307 (11th Cir. Apr. 30, 2010)**

What is the meaning of “public entity” for purposes of ADA Title II, which prohibits such entities from discriminating against qualified individuals with disabilities? The case involved a plaintiff prisoner who alleged Title II violations against a private prison management system (GEO) operating a Florida state prison. In finding for defendant and holding that GEO was not a public entity, the court participated in lengthy statutory interpretation. §12131 defines a public entity as “any department, agency, special purpose district, or other instrumentality of a State.” Reasoning that the meaning of “instrumentality of a State” could be discerned with reference to the rest of the words in the statute, the court determined that the phrase was intended to refer only to a governmental unit because all the other words around the phrase do. According to the court, a private corporation is not such a unit, and it cannot be one merely because it contracts with a public entity to provide some services.



**American Association of People with Disabilities v. Harris,
605 F.3d 1124 (11th Cir. May 11, 2010)**

Visually and manually impaired voters alleged that Florida’s use of an inaccessible optical scan voting system violated Title II. This case addressed whether the implementing regulation (28 C.F.R. §35.151) to Title II §12132 independently creates a private right of action. The district court ultimately issued an injunction, not based on Title II itself, but on the language of the implementing regulation which required public entities to provide “to the maximum extent feasible” an altered portion of a facility that was “readily accessible.” It held that voting equipment constituted a facility that, when altered, obligated the public entity operating it to make it accessible.

The circuit court reversed the injunction, reasoning from scattered Supreme Court precedent that there is no freestanding private right of action to enforce a statute’s implementing regulation unless Congress has clearly indicated to the contrary. By analyzing the text, history, and structure of both Title II §12132 and the regulation, the Court determined that while the overarching purpose of ADA regulations is to provide standards for compliance, the ADA does not to give individuals a right to sue if compliance with those standards is not met. Congress placed any available recourse for plaintiffs alleging disability discrimination within the language of the ADA. Nothing in §12133 indicates Congress’s intent to provide a private right of action to redress violations of the ADA’s regulations.



**Turner v. Masters, --- S.E.2d ----,
2010 WL 2674599 (Ga.App., Jul 07, 2010)(NO. A10A0557)**

The Georgia Court of Appeals held that the trial court did not abuse its discretion by refusing to grant the Plaintiff’s request to testify from the plaintiff’s table, even though the Plaintiff stated that she “suffers from memory disturbance, attention deficit disorder, confusion, and panic attacks.” When denying the request to testify from the plaintiff’s table, the trial court “instructed Turner that she could ‘take whatever [she] want[ed] to up to the stand with [her] and spread it out on the stand however [she]

want[ed] to," but concluded that all witnesses had "to be treated fairly in the courtroom." Furthermore, the Court of Appeals held that the plaintiff's requested relief of a new trial or setting the jury's verdict aside were not available remedies under the ADA.



Justice Department Obtains Comprehensive Agreement Regarding the State of Georgia's Mental Health and Developmental Disability System | [File download](#)

The Justice Department entered into a comprehensive settlement agreement that will resolve a lawsuit the United States brought against the state of Georgia. The lawsuit alleged unlawful segregation of individuals with mental illness and developmental disabilities in the state's psychiatric hospitals in violation of the Americans with Disabilities Act (ADA) and the Supreme Court's landmark decision in *Olmstead v. L.C.* The agreement expands community mental health services so that Georgia can serve individuals with mental illness and developmental disabilities in the most integrated setting appropriate to those individuals' needs.

Frequently Asked Questions

? What does the ADA Coordinator's Office Do?

- Serves as a [technical resource to State agencies](#) for the ADA's Title II general nondiscrimination requirements, program accessibility, communications and employment (including the reasonable accommodation process);
- Operates the [statewide ADA facility improvements program](#);
- Assists State agencies in updating, strengthening and enhancing the scope of self-evaluation and transition plans to ensure compliance with the ADA mandate;
- Conducts [general and customized training](#) on ADA topics for State agencies;
- Provides [informal technical assistance about the ADA](#) to the general public, collaborates with local ADA support systems; and
- Increases the visibility of the ADA to help more citizens understand the letter and the spirit of the law.

? What do I need to know about interacting with people with disabilities?

When meeting someone with a disability that affects learning, intelligence, or brain function:

- Keep your communication simple. Rephrase comments or questions for better clarity.
- Stay focused on the person as he or she responds to you.
- Allow the person time to tell or show you what he or she wants.

When you are with a person who uses a wheelchair:

- Do not push, lean on, or hold onto a person's wheelchair unless the person asks you to. The wheelchair is part of his or her personal space.
- Try to put yourself at eye level when talking with someone in a wheelchair. Sit or kneel in front of the person.
- Rearrange furniture or objects to accommodate a wheelchair before the person arrives.
- Offer to tell where accessible rest rooms, telephones, and water fountains are located.
- When giving directions to a person in a wheelchair, consider distance, weather conditions, and physical obstacles (curbs, stairs, steep hills, etc.)

Talking with a person who is deaf or uses a hearing aid:

- Let the person take the lead in establishing the communication mode, such as lip-reading, sign language, or writing notes.
- Talk directly to the person, even when a sign language interpreter is present.
- If the person lip-reads, face him or her directly, speak clearly and with a moderate pace.
- With some people, it may help to simplify your sentences and use more facial expressions and body language.

When meeting a person with a disability that affects speech:

- Pay attention, be patient, and wait for the person to complete a word or thought. Do not finish it for the person.
- Ask the person to repeat what is said, if you do not understand. Tell the person what you heard and see if it is close to what he or she is saying.
- Be prepared for various devices or techniques used to enhance or augment speech. Do not be afraid to communicate with someone who uses an alphabet board or a computer with synthesized speech.

Interacting with a person who is blind or has a disability that affects sight or vision:

- When greeting the person, identify yourself and introduce others who may be present.
- Do not leave the person without excusing yourself first.
- When asked to guide someone with a sight disability, never push or pull the person. Allow him or her to take your arm, then walk slightly ahead. Point out doors, stairs, or curbs, as you approach them.
- As you enter a room with the person, describe the layout and location of furniture, etc.
- Be specific when describing the location of objects. (Example: "There is a chair three feet from you at eleven o'clock.")
- Do not pet or distract a guide dog. The dog is responsible for its owner's safety and is always working. It is not a pet.

Resources and Publications from the ADA Coordinator's Office

The following is a list of publications independently developed by the ADA Coordinator's office or in conjunction with collaborative partners.



Accessibility in State Owned Buildings and Facilities

 [PDF](#) | [HTML](#) | September 2009

A Meaningful Opportunity to Participate A Handbook for Georgia Court Officials on Courtroom Accessibility for Individuals with Disabilities

 [PDF](#) | December 2004

Best Practices when Interacting with Persons with Disabilities

 [PDF](#) | [HTML](#) | September 2009

Finding the Path to Equal Justice A Handbook for Adult Defendants with Intellectual Disabilities and Their Families

 [PDF](#) | August 2007

Georgia's Emergency Preparedness for Individuals with Disabilities and Elderly Persons

 [PDF](#) | [HTML](#) | September 2009

Opening the Door: Justice for Adult Defendants with Mental Retardation

A Handbook for Attorneys Practicing in Georgia

 [PDF](#) | August 2007

TIPS Guide for First Responders

 [PDF](#) | [HTML](#) | August 2010

Additional Resources and Publications

Topic Guides on ADA Transportation

These seven Topic Guides — available from the Federal Transit Administration — bring together the requirements of the Americans with Disabilities Act and the U.S. Department of Transportation's ADA regulations, FTA determinations, and operational practices that comply with the ADA. Each Topic Guide is available as a webpage (HTML), a PDF file (.pdf), and a plain Text file (.txt).



Topics include:

1. Equipment Maintenance
2. Stop Announcement and Route Identification
3. Eligibility for ADA Paratransit
4. Telephone Hold Time in ADA Paratransit
5. Origin to Destination Service in ADA Paratransit
6. On-Time Performance in ADA Paratransit
7. No-Shows in ADA Paratransit

Source: Federal Transit Administration (FTA)

Creating an Inclusive Environment: A Handbook for the Inclusion of People with Disabilities in National and Community Service Programs

The National Service Inclusion Project (NSIP) developed a comprehensive handbook which, although intended to enhance the participation rate of people with disabilities within service organizations, has excellent content for greater inclusion of people with disabilities within workplaces. Handbook topics include: Inclusive Recruitment, Inclusive Interviewing, Accommodations and Management and Retention.

Source: National Service Inclusion Project (NSIP)

People with Disabilities in the Workplace

Facts and figures about employees with disabilities tell only one part of the story. The DBTAC: Southeast ADA Center has profiled nine individuals with different disabilities who provide a real-life look at the worklife experiences of employees with disabilities.

Source: http://sedbtac.org/ada/ada_in_action/empprofiles.php

Ten Employment Myths: Information about the Americans with Disabilities Act

This new 17-minute video for employers uses a question-and-answer format to explain the ADA in common sense terms and refute unfounded misconceptions and fears that many employers may have about hiring people with disabilities. The video is available online in dial-up and high speed download formats with open captions and audio description.

Source: U. S. Department of Justice

ADA National Network: Public Service Announcement (PSA) Series

This PSA Series offers six quick and compelling glimpses into the daily lives of people with disabilities. The ADA National Network by DBTAC - the leaders in providing information, guidance and training on the Americans with Disabilities Act (ADA) - created this PSA Series to celebrate the 20th ADA Anniversary on July 26, 2010.

1. [I Am —“Who’s a person with a disability?”](#)
2. [You're Hired —“What do I need to know about hiring someone with a disability?”](#)
3. [Where's Brett?—“What’s keeping Brett from joining his birthday party?”](#)
4. [Service Animals Welcome—“What’s that dog doing in a supermarket?”](#)
5. [Good Morning Class—“College students get a surprise.”](#)
6. [Day in Student Life—“On her way to graduate school.”](#)

Source: <http://www.youtube.com/user/DBTACSoutheastADA>

Training Opportunities from the ADA Coordinator’s Office



The ADA Coordinator’s Office conducts general and customized training on ADA topics for state agencies and other targeted audiences to ensure appropriate familiarity with the Act’s requirements applicable to State government utilizing various delivery methods, including:

- Training/Seminars entirely developed and delivered by the Office;
- Training/Seminars delivered by the Office in collaboration with other entities;
- Training/Seminars offered by other entities in which the Office’s personnel are trainers/presenters;
- Training/Seminars developed and delivered externally in which the Office coordinates state agency participation;

Trainings provided by our office may be “stand-alone” trainings or part of a larger project or technical support request.

If you have a specific ADA training request please contact our office at phone: (404) 657-7313 [voice], TTY: (404) 657-9993 or [email: gaada@gsfic.ga.gov](mailto:gaada@gsfic.ga.gov).

Additional Training Opportunities

Respectful Interaction and Excellent Customer Service for Georgians with Disabilities

The Georgia State ADA Coordinator’s Office and the Institute for Human Development and Disability are offering training on “Respectful Interaction and Excellent Customer Service for Georgians with Disabilities.” For more information and to schedule training, contact the State ADA Coordinator’s Office at phone: (404) 657-7313 [voice], TTY: (404) 657-9993, or [email: gaada@gsfic.ga.gov](mailto:gaada@gsfic.ga.gov).

Legal Webinar Series from the ADA National Network by DBTAC

The Legal Webinar Series is designed for individuals who have a working knowledge of the ADA and are familiar with its basic elements. Sessions are intended to support continued learning and focus on the knowledge that has

been gained since the implementation of the law in terms of how the federal agencies and the courts are interpreting the law and subsequent regulations.

Each session is 90 minutes in length. Sessions are held from 2:00-3:30 Eastern time. The presenters are Barry Taylor, Esq., Director of Legal Services and Alan Goldstein, Senior Attorney, Equip for Equality, the Protection and Advocacy program in Illinois.

- **March 16, 2011 ~ ~ 2:00 P.M. to 3: 30 P.M. ET**
Post Secondary and Professional Licensing/Testing Issues

The Department of Justice and federal court opinions confirm that colleges, universities, community colleges, and licensing entities are covered by Titles II and III of the ADA. Questions frequently arise about the types of reasonable accommodations and modifications required by the ADA, as well as the parameters of permissible medical inquiries. This webinar will review the relevant federal regulations and case law, and also discuss how the ADA Amendments Act may alter legal precedent on these issues.

- **July 20, 2011 ~ ~ 2:00 P.M. to 3: 30 P. M ET**
Drugs, Alcohol and Conduct Rules Under the ADA (includes legal brief)

Employers and employees frequently express confusion about how the ADA interfaces with issues involving drugs, alcohol and related conduct rules. When are drug testing or fitness-for-duty examinations permissible? Can an employer request medical substantiation of rehabilitation? This webinar will review how these and other issues are addressed in the text of the ADA, federal regulations and guidance, and case decisions across the country.

- **September 21, 20~ ~ 2:00 P.M. to 3: 30 P. M ET**
The Litigation Landscape After the ADAAA

The ADA Amendments Act was passed in September 2008, but it takes some time for these cases to work themselves into the courts and influence the way that the courts interpret the ADA. This session will review cases interpreting the definition of disability under the ADA Amendments Act, and also discuss emerging ADA legal issues in the wake of fewer cases being dismissed for failing to meet the definition of disability. What are the courts now saying about requirements for being qualified or for proving undue hardship or direct threat? Attend this webinar to find out.

Source: <http://ada-audio.org/Webinar/ADALegal/>

Online Courses from the ADA National Network by DBTAC

ADA Title II Tutorial

A free tutorial on the requirements applicable to State and Local government under Title II of the Americans with Disabilities Act (ADA).

Cost: \$0 – Free

Credit: CEU 0.3; CRCC 2.0

Source: <http://adacourse.org/title2/>

Accommodating People with Cognitive Disabilities in the Workplace Online Workshop

This online workshop provides an enhanced understanding of people with cognitive disabilities, makes sense of the ADA and legal responsibilities related to people with cognitive disabilities, and provides tools that can be applied in the workplace when addressing accommodations for people with cognitive disabilities.

Cost: \$0 - Free (Registration required).

Source: <http://adagreatlakes.org/Presentations/CognitiveDisabilities/slides.asp>

At Your Service: Welcoming Customers with Disabilities

A free, self-paced webcourse for discovering the best practices for effectively working and interacting with people who have disabilities.

Cost: \$0 – Free

Credit: CEU 0.5

Source: <http://wiawebcourse.org>

Other ADA Online Courses

Courses from the ILRU

The ILRU (Independent Living Research Utilization) is a national center for information, training, research, and technical assistance in independent living. It is a program of The Institute for Rehabilitation and Research (TIRR), a nationally recognized medical rehabilitation facility for persons with disabilities.

Source: <http://www.bcm.edu/ilru/html/training/webcasts/calendar.html>

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and Rehabilitation Research (NIDRR). However, NIDRR is not responsible for ADA enforcement and the contents do not necessarily represent the policy of the Department of Education or NIDRR, and you should not assume endorsement by the Federal government.

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