

# **AmeriCorps Program Directors Resource Guide to Disability Inclusion**

**Drake University  
Disability Resource Center**

# AmeriCorps Program Director's Resource Guide

## Chapter 14 Disability Inclusion

The National and Community Service Trust Act, as amended, requires AmeriCorps programs to actively recruit individuals with disabilities. The Iowa Commission on Volunteer Service requires program directors to include a plan to recruit and retain qualified individuals with disabilities in their program proposals. A **qualified individual with a disability** is a person who has the skill, experience, and education for a service position and can perform the essential functions of the position with or without reasonable accommodation. The selection process for AmeriCorps members must be based on the qualifications of the applicants and whether they can perform the essential program activities. If applicants with disabilities are qualified, then program directors are obligated by law to provide reasonable accommodations, when requested. Program directors are not asked to enroll individuals who are unqualified. The Iowa Commission has contracted with the Disability Resource Center (DRC) at Drake University in Des Moines, Iowa, to assist program directors with the development and implementation of a disability plan. The table that follows defines the steps, activities and efforts that will lead to the recruitment, inclusion and retention of members with disabilities. Questions regarding disabilities, accessibility, accommodations, training, and technical assistance should be directed to:

Kathy Kerst  
 AmeriCorps Disability Demonstration Program  
 Disability Resource Center, Drake University  
 Phone: 515-271-3055, Fax: 515-271-3866, TTY: 515-271-2825  
 e-mail: *kathryn.kerst@drake.edu*

Additional resources are included in the table, with a complete listing of addresses at the end of the chapter.

### Steps to Inclusion

STEPS	HOW TO	RESOURCES
1. Evaluate your program's accessibility.	A. Complete an <b>Accessibility Checklist</b> to evaluate what has been done or what needs to be done to make sure your program meets accessibility guidelines.	<b>Appendix A</b> <ul style="list-style-type: none"> <li>• Access AmeriCorps Checklist Revised</li> <li>• The Americans with Disabilities Act- Checklist for Readily Achievable Barrier Removal</li> <li>• ADAAG-A Guide to the Americans with Disabilities Act Accessibility Guidelines</li> </ul> <b>Accessibility guideline questions:</b> ADA Information: 1-800-949-4232 Access Board: 1-800-USA-ABLE

STEPS	HOW TO	RESOURCES
2. Develop <b>service descriptions</b> for the positions for which you are recruiting and identify the <b>essential functions</b> .	<p>A. Conduct a <b>Position Analysis</b> to carefully determine the fundamental duties of a service position.</p> <p>B. Determine what functions are essential and what functions are marginal.</p>	<p><b>Appendix B</b></p> <ul style="list-style-type: none"> <li>• Position Analysis Form</li> <li>• Service Description Form</li> <li>• Definitions: Essential vs. Marginal Functions</li> </ul>
3. Ensure that the application process and all forms are accessible to persons with disabilities. An applicant may request printed materials in an <b>alternate format</b> (large print, Braille, audio tape, computer disc).	<p>A. Hold interviews in an accessible location.</p> <p>B. If requested, make printed materials available in alternate formats.</p> <p>C. Provide readers or interpreters for interviews when requested. If testing is required, provide accommodations as needed.</p>	<p>Alternate Format Resources:</p> <p><b>Braille:</b> IA Dept. for the Blind 1-800-362-2587, Central Iowa Center for Independent Living (Des Moines area) 515-243-1742</p> <p><b>Large Print</b> (18 pt.): your copier, your personal computer, commercial printers</p> <p><b>Audio Taping/Readers:</b> Program staff/members, DRC 515-271-3055, IA Dept. for the Blind 1-800-362-2587</p> <p><b>Interpreters:</b> Deaf Action Center 515-266-5105, Deaf Family Services 515-288-9023</p>
4. Actively recruit qualified members with disabilities.	<p>A. Add an inclusive statement to recruitment materials such as <i>“Individuals with disabilities are encouraged to apply.”</i></p> <p>B. Include pictures of AmeriCorps members with disabilities in recruiting materials.</p> <p>C. Form working relationships with local agencies in the disability community such as independent living centers, local social service and education agencies, vocational rehabilitation agencies, the department for the blind, and college disability student services offices.</p>	<p>Examples of Disability Agencies:</p> <p>Division of Vocational Rehabilitation Services 515-281-4311</p> <p>IA Dept. of Blind 1-800-362-2587</p> <p>IA Commission on Persons with Disabilities 1-800-652-4298</p>
5. Avoid discriminatory practices when hiring.	<p>A. Review your <b>responsibilities and rights</b> related to hiring an individual with a disability.</p> <p>B. When evaluating applicants, make only qualitative decisions relevant to the skills required to perform the essential functions of the positions.</p> <p>C. Make the interview about ability, not disability.</p>	<p><b>Appendix C</b></p> <ul style="list-style-type: none"> <li>• Guidelines for Position Interviews: Responsibilities &amp; Rights</li> <li>• Interview Do’s &amp; Don’ts</li> <li>• Appropriate and Inappropriate Interview Questions</li> </ul>

STEPS	HOW TO	RESOURCES
<p>6. Coordinate <b>reasonable accommodations</b>.            Keep in mind that reasonable accommodation needs will vary from program to program as well as from individual to individual. Reasonable accommodations will need to be determined on a case by case basis.</p>	<p>A. Review accommodation requests with the applicant/member with the disability. Assistance may be needed in determining what accommodations are necessary. Accommodation requests should be kept CONFIDENTIAL.</p> <p>B. Determine what resources are available to implement the accommodations.</p> <p>C. Estimate cost of accommodation and determine funding options:            1. Review program budget.            2. Identify community resources.            3. Request funding from Iowa Commission.</p> <p>* If Iowa Commission funds are needed to make the accommodation then complete the application form. (See Appendix D)</p> <p>* Under current legislation (1999), <u>formula programs</u> cannot access state commission accommodation funds. The Iowa Commission suggests that formula programs designate 1% of total program budget for accommodation funds.</p> <p>D. Choose the accommodation that is most appropriate for both the program and the member. You may choose the accommodation that is less expensive or easier, yet still effective.</p> <p>E. Decide if the accommodation is reasonable:            1. Does it fundamentally alter the nature of the position/program?            2. Is it an administrative burden?            3. Does it cause undue financial hardship?</p> <p><b>Note:</b> Program directors who want to deny accommodation requests should consult with the Iowa Commission and Drake's DRC prior to denial. If an applicant/member's request for a reasonable accommodation is denied, the applicant/member has the right to file a grievance. Every AmeriCorps program has a grievance policy in place (Section 116(f)). Individuals who request a reasonable accommodation should be informed of this grievance procedure.</p>	<p><b>Appendix D</b></p> <ul style="list-style-type: none"> <li>• Application Form for Iowa Commission Accommodation Funds</li> <li>• Guidelines for Determining Reasonable Accommodations: Responsibilities &amp; Rights</li> </ul> <p>You may need to consult with rehabilitation professionals to identify potential solutions. The following agencies can provide assistance:            ADA Information 1-800-949-4232            InfoTech 1-800-331-3027            Iowa Program for Assistive Technology 1-800-348-7193            Job Accommodation Network 1-800-526-7236</p> <p><b>Note:</b> The member with the disability is always your best resource when it comes to determining appropriate accommodations.</p>

STEPS	HOW TO	RESOURCES
7. Ensure full inclusion/participation of individuals with disabilities in all program activities.	<p>A. All notices, flyers, advertisements, posters, brochures, etc., that publicize a program, service project, or activity should include a <b>reasonable accommodation statement</b>.</p> <p>B. Be aware that casual gatherings also need to be accessible. Ask members with disabilities what's needed for full participation.</p>	<p><b>Sample Reasonable Accommodation Statement:</b></p> <p><i>“Individuals with disabilities who need wheelchair accessible locations and/or other reasonable accommodations may make arrangements by calling (Name Of Contact Person) at (Phone Number) by (Deadline for requesting accommodation).”</i></p> <p>The response deadline should be approximately 2 weeks before the activity to allow time to make the most appropriate and reasonable accommodation.</p>
8. Retain members with disabilities.	<p>A. Talk over problems or conflicts with members as they arise.</p> <p>B. Ask the member with a disability for their help in solving problems.</p> <p>C. Recognize that accommodation needs may change over time.</p>	Utilize local experts as a resource for technical assistance.
9. Include a training session on disability awareness in your program's new member orientation.	<p>A. Add to existing training or merge with diversity training.</p> <p>B. Utilize outside speakers.</p>	<p><b>Contact for speakers:</b>  DRC 515-271-3055  Iowa Commission On Persons With Disabilities 1-800-652-4298  Local community disability agencies.</p>

## RESOURCES

Please Note: TTY (Tele Typewriter Phone) & TDD (Tele Communication Device for the Deaf) are assistive devices utilized for individuals with communications disabilities. They are small “typewriter like” instruments which link to a standard telephone. If you do not have access to a TTY/TDD please refer to Relay Iowa below.

### **Access AmeriCorps**

United Cerebral Palsy Associations, Inc.  
1660 L Street NW, Suite 700  
Washington, DC 20036-5602  
202-776-0406 (Voice)  
202-973-7197 (TTY)  
202-776-6414 (Fax)

*Provides technical assistance and training designed specifically for State Commissions in the area of inclusion of individuals with disabilities into AmeriCorps Programs.*

### **Architectural and Transportation Barriers**

#### **Compliance Board (Access Board)**

1111 18th Street NW, Suite 501  
Washington, DC 20036-3894  
1-800-USA-ABLE (Voice & TTY)  
Website: <http://www.access-board.gov/>

*Sets guidelines for accessibility standards. Provides technical assistance on accessibility (transportation, architectural, and communication) requirements.*

### **ADA Information**

Technical Assistance  
University of Missouri at Columbia  
4812 Santana Circle  
Columbia, MO 65203  
1-800-949-4232 (Voice)  
314-882-3600 (TTY)  
573-884-4925 (Fax)  
e-mail: [adahl@showme.missouri.edu](mailto:adahl@showme.missouri.edu)  
*Provides technical assistance related to the ADA.*

### **Central Iowa Center for Independent Living (CICIL)**

1024 Walnut Avenue  
Des Moines, IA 50309  
515-243-1742

*Community-based center that is a general resource for disability information. Also can convert printed material to Braille. Other independent living centers are located throughout Iowa.*

### **Deaf Action Center**

2600 E. Euclid Avenue  
Des Moines, IA 50317  
515-266-5105 (Voice)  
515-266-0600 (TTY)

*Can coordinate and provide sign language interpreters.*

### **Deaf Family Services**

#### **Employee and Family Resources**

1446 Martin Luther King Jr. Pkwy  
Des Moines, IA 50314  
515-288-9023 (Voice & TTY)

*Can coordinate and provide sign language interpreters.*

### **Disability Resource Center (DRC)**

#### **Drake University**

2507 University Avenue  
Des Moines, IA 50311  
515-271-3100 (Voice) general  
515-271-3055 (Voice) Kathy Kerst  
515-271-2825 (TTY)

515-271-3866 (Fax)  
*The DRC contracts with the Iowa Commission to provide assistance with accessibility, accommodations, training, and technical assistance related to inclusion issues.*

**Division of Vocational Rehabilitation Services (DVRS)****Iowa Department of Education**

510 E. 12th Street

Des Moines, IA 50319

515-281-4311

1-800-532-1486 (Voice & TTY)

515-281-4073 (Fax)

*DVRS has area offices in all Counties in Iowa. Area offices are listed under State of Iowa, Education Department in the government pages of your phone book. Provides recruitment and assistance with funding accommodations.*

**InfoTech**

1-800-331-3027

*Provides information and referral services about assistive technology.*

**Iowa Commission of Persons with Disabilities****Department of Human Rights**

Lucas State Office Building

321 E. 12th Street

Des Moines, IA 50319

515-242-6172 (Voice & TTY)

1-800-652-4298 (Voice & TTY)

515-242-6119 (Fax)

*Promotes employment of individuals with disabilities. A good general resource for information about disabilities. Can also provide disability awareness speakers.*

**Iowa Compass**

S277 UHS

100 Hawkins Drive

Iowa City, IA 52242

1-800-779-2001

*Resource pool for information related to disability issues.*

**Iowa Department for the Blind**

524 4th Street

Des Moines, IA 50309-2364

1-800-362-2587, 515-281-1333 (Voice)

515-281-1355 (TTY)

515-281-1263 (Fax)

*Provides accommodation services such as Braille and audio taping. Rehabilitation and placement counselors are a good resource for recruitment and technical assistance in the area of visual abilities.*

**IPAT (Iowa Program for Assistive Technology)**

S138 University Hospital School

Iowa City, IA 52242

1-800-348-7193

*Provides information about assistive technology.*

**Job Accommodation Network (JAN)**

West Virginia University

918 Chestnut Ridge Road, Suite 1

PO Box 6080

Morgantown, WV 26506-9901

1-800-526-7236 (Voice & TTY)

Website: <http://janweb.icdi.wvu.edu>

*Assists with accommodation options. Provides information about how a member with a disability might begin a service commitment, or continue after the onset of a disability. Provides access to an extensive library of information about accommodation strategies and methods.*

**Relay Iowa**

This service allows communication between TTY devices and telephones (voice.) If you do not have access to a TTY or TDD you can call Relay Iowa and they will transmit the message for you.

1-800-735-2943 (Voice)

1-800-735-2942 (TTY user)

*Relay Iowa provides full telephone accessibility to people who are deaf, hard of hearing, or speech impaired. This free service is available 24 hours a day, 365 days a year. There is no restriction on the length or number of calls placed.*

**US Department of Justice  
Civil Rights Division  
Public Access Section**

PO Box 66738

Washington, DC 20035-9998

202-514-0301 (Voice)

202-514-0383 (TTY)

1-800-514-0301 (Information Line)

Website: <http://www.usdoj.gov/crt/ada/adahom1.htm>

Provides technical assistance related to disability laws. An enforcement agency for complaints.

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## APPENDIX A

Access AmeriCorps Checklist Revised

The American with Disabilities Act-Checklist for Readily Achievable Barrier Removal  
ADAAG Manual-A Guide to the Americans with Disabilities Act Accessibility  
Guidelines

## **Determining Accessibility in Your AmeriCorps Programs and Facilities**

Accessibility means easy to approach, enter, operate, participate in and/or use safely and with dignity by *every* individual. There are two levels of accessibility: programmatic and environmental. Programmatic accessibility refers to personnel issues such as essential service functions, reasonable accommodations, interviewing, and development of a disability management plan. Environmental accessibility refers to the architectural barriers that exist in our buildings, parks, and facilities.

AmeriCorps program directors should evaluate what has been done to make programs and existing facilities accessible and useable by individuals with disabilities. The purpose of this evaluation is twofold. First, it allows the gathering of information about an AmeriCorps program's level of accessibility. A good self-evaluation will capture both strengths and weaknesses. This information leads to the development of a concrete plan based on real data which in turn will increase the level of accessibility of programs. Second, it helps in the development of an internal action plan. A good internal action plan prioritizes the existing communication and architectural barriers and places a time line on their removal.

The following resources, which address the requirements of the National and Community Service Trust Act regarding individuals with disabilities and the requirements of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act of 1973, as amended, have been provided to help determine accessibility:

- Access AmeriCorps Checklist, Revised Section I, Recruitment/Accommodation Practices Section II, General Non-Discriminatory Obligations Section III, Communication Accessibility
- The Americans with Disabilities Act--Checklist for Readily Achievable Barrier Removal

It is recommended that each checklist be completed so that both programmatic and environmental levels of accessibility can be assessed. Sections I and II of the Access AmeriCorps Checklist evaluate programmatic accessibility while Section III and the Checklist for Readily Achievable Barrier Removal review environmental accessibility. A third resource, the ADAAG Manual--A Guide to the Americans with Disabilities Act Accessibility Guidelines, is also included as it is useful for explanations and diagrams of the existing requirements.

**Access AmeriCorps** recommends the following steps:

1. Complete the checklists and maintain all documents on file.
2. Develop an internal action plan to rectify identified issues.
3. Develop written organization-wide policies.
4. Annually review and update the internal action plan.

For questions regarding accessibility, requirements of the disability laws and/or specific situations contact Drake's Disability Resource Center at 515-271-3055, Access AmeriCorps at 202-776-0406, ADA Information at 1-800-949-4232, or the Access Board at 1-800-USA-ABLE.

## Section I: Recruitment/Accommodation Practices

The following portion of the checklist reviews recommended recruitment and accommodation practices for AmeriCorps programs. The requirements as legislated by the disability laws are included here along with suggestions as to how to evaluate your efforts to date. If there is terminology that you do not understand, or if you have additional questions, please call Drake's Disability Resource Center at 515-271-3055 for assistance.

1. Has the program affirmatively sought to recruit applicants and retain qualified members with disabilities?  
Yes      No
2. Do recruitment materials, including photos and ad copy, contain positive images of individuals with disabilities, and do they indicate a commitment to inclusion of individuals with disabilities?  
Yes      No
3. Do you have a written policy addressing discrimination on the basis of disability?  
Yes      No
4. Do you regularly review your recruitment practices to be certain that you, your supervisors, or external consultants are nondiscriminatory in the treatment of applicants and members with disabilities?  
Yes      No
  - a. Do your interview questions address an applicant's ability to perform essential position functions without specifically asking about disability?  
Yes      No
5. Are service descriptions in writing?  
Yes      No
  - a. Have service descriptions been analyzed to determine which functions of a member's service are 'essential' and which are 'marginal'?  
Yes      No
6. Are supervisory staff aware of what questions can and cannot be asked in an interview?  
Yes      No
  - a. If yes, describe how this information was obtained. For example, did staff participate in a training session, read relevant literature, etc.?
  - b. Are questions asked about any of the following during the recruitment or application process?
    1. Health or physical condition      Yes      No
    2. Physical, mental, or learning disabilities      Yes      No
    3. Medical history      Yes      No

- |  |     |    |
|--|-----|----|
| 4. Previous workers' compensation claims | Yes | No |
| 5. Prior health insurance claims         | Yes | No |
| 6. Past drug use or substance abuse      | Yes | No |
7. Are any of the following tests required of applicants for *AmeriCorps* positions as part of the application process?
- |                               |     |    |
|-------------------------------|-----|----|
| a. Drug or alcohol tests      | Yes | No |
| b. HIV tests                  | Yes | No |
| c. Skill or performance tests | Yes | No |
| d. Psychological tests        | Yes | No |
| e. Intelligence tests         | Yes | No |
8. Are all members' non-medical records kept in a separate place from records that contain medical information?
- Yes      No
- a. Is there a written policy regarding who has access to medical information?
- Yes      No      If yes, attach a copy of the policy.
9. Have members and applicants been informed that they are entitled to reasonable accommodations?
- Yes      No
- a. If yes, how have they been informed?
- b. Are reasonable accommodations provided to *AmeriCorps* members with disabilities?
- Yes      No
- c. Has a written reasonable accommodation policy been developed?
- Yes      No      If yes, attach a copy of the policy.
- d. Do supervisory staff know how to proceed if an accommodation is requested?
- Yes      No
- e. Has a specific supervisory staff member been designated to coordinate reasonable accommodations?
- Yes      No
- f. Is there a grievance procedure for denial of a reasonable accommodation request?
- Yes      No
- g. Do supervisory staff know how to secure a sign language interpreter if necessary?
- Yes      No

h. Do supervisory staff know how to get written material:

- |   |     |    |
|---|-----|----|
| i. transcribed into Braille             | Yes | No |
| ii. printed in large print              | Yes | No |
| iii. recorded on audio cassette         | Yes | No |
| iv. placed on an ASCII (computer) disk? | Yes | No |

i. Are reasonable accommodations, including sign language interpreters, written materials in alternate format, etc., provided to individuals with disabilities at off-site meetings, training, and social events?

Yes      No

10. As a matter of policy are interviews, member/staff meetings, and other meetings held in accessible locations?

Yes      No

11. Are off-site member/staff trainings, holiday parties, picnics or other gatherings held in accessible locations?

Yes      No

## **Section II: General Non-Discrimination Obligations**

Section I examines how well programs ensure that discrimination does not occur against applicants and members with disabilities. However, requirements for AmeriCorps programs include not only applicants and members with disabilities but the general public as well. AmeriCorps programs must provide equal opportunity to the individuals with disabilities that they serve. For example, an AmeriCorps program would be prohibited from excluding a qualified child with a disability from an after-school literacy program on the basis of the child's disability. The following checklist will assist in determining compliance with these standards.

1. Have program members received disability awareness training?

Yes      No

a. Describe the training (length, topic, frequency) and whom it was presented by.

2. Are there any circumstances when an individual with a disability would be prohibited from receiving services from an *AmeriCorps* program?

Yes      No

a. If yes, please describe the circumstances.

3. Are there any circumstances when an individual with a disability would receive a lesser or different benefit from a person without a disability?

Yes      No

a. If yes, please describe.

b. If yes, is there a way to equalize the benefit?

4. Are participants/members of the public with disabilities ever charged an extra fee for program modifications, effective communications, or structural modification costs?  
Yes      No
5. Are supervisory staff made aware of how to make reasonable modification to policies, practices, and procedures when necessary so that persons with disabilities can receive services and/or benefit from the program?  
Yes      No
6. Have program members received any training or instruction as to what circumstances may necessitate modifications or accommodations?  
Yes      No
  - a. If yes, please describe.
  - b. Has that training been effective? Please describe.
7. Are there instances when members of the public with disabilities are provided services in a separate or segregated setting?  
Yes      No
  - a. If yes, please describe these instances.

Services must be provided to people with disabilities in the most integrated setting appropriate. **Note:** This requirement does not prohibit the establishment of separate projects for people with disabilities, e.g. an AIDS program as long as people with AIDS are not prohibited from participating in regular programs.

8. Has your program notified outside contractors of services of their obligation to comply with your level of responsibility under the ADA for accessibility and accommodation?  
Yes      No
  - a. Have outside contractors been required to make assurances to that effect?  
Yes      No      If yes, please attach a copy of the contractual assurances.

### Section III: Communications Accessibility Checklist

Communication access refers to the way information is received and transmitted. Title III of the ADA requires the provision of auxiliary communication aids and services. These are devices that can accommodate a person with a communication disability, such as a hearing impairment, a visual impairment, or a speech/language problem. Auxiliary aids and services include qualified sign language interpreters and communication devices for persons who are deaf or hard of hearing; qualified readers, taped texts, Braille or other devices for people with visual impairments; adaptive equipment or similar services and activities for people with other communication disabilities. Programs need to be evaluated in terms of access to communication.

1. Can information that is communicated visually (brochures, enrollment forms, handbooks, videotapes, flip charts, slides, posters, printed directional signs, and so forth) be provided in an alternate format, if requested?

Yes      No

2. Can information that is communicated verbally be provided in an alternate format, if requested?

Yes      No

3. Does the program inform participants/members of the public with disabilities that auxiliary aids and services are provided upon request?

Yes      No

a. If yes, attach an example.

Title II/Section 504 requires that every effort be made to meet an individual's preferred method of auxiliary aids and services. If the preferred method cannot be provided you must ensure that the selected method is effective.
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4. Is there a procedure for deciding which auxiliary aids and services to provide?    Yes    No

a. Does the procedure provide for consideration of an individual's preferred communication aid?

Yes      No

b. Does the procedure include a mechanism for determining if the communication aid that is provided is equally as effective as the communication aid that was requested?

Yes      No

5. Can an individual with a hearing or speech impairment access a TTY/TDD phone system at your program site?

Yes      No

A TTY/TDD (text telephone) is a device that allows individuals with hearing or speech impairments to communicate over the telephone. TTY's (Teletypewriter Phone System) and TDD's (Telecommunication Device for Deaf Persons) are different names for the same things. The abbreviation "TTY" is preferred by most users of these devices.
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a. If so, have members been trained to use a TTY?

Yes    No

b. Is there a mechanism for re-training?

Yes    No

c. If your program does not have a telephone equipped with a TTY do members know how to use Relay Iowa?

Yes No

Relay Iowa is a service that allows communication between TTY devices and telephones (voice). If you do not have access to a TTY you can call Relay Iowa and they will transmit the message for you. This is a free service which is available 24 hours a day, 365 days a year. To access Relay Iowa call 1-800-735-2943 (Voice) or 1-800-735-2942 (TTY users).

d. Are the telephone numbers for Relay Iowa posted near your telephone?

Yes No

6. Is there a mechanism for ensuring that people who are deaf or hearing impaired are aware of an activated fire or smoke alarm?

Yes No

7. Is there an established emergency evacuation procedure that addresses the needs of persons with disabilities, including the evacuation of individuals with mobility impairments?

Yes No

a. Have members been trained in this procedure?

Yes No

b. Please describe the training.

8. Does your program have it's own web page?

Yes No

a. Is the web page accessible to individuals with disabilities?

Yes No

It is required by law that your site be accessible. "Bobby" is a web-based public service offered by CAST (Center for Applied Special Technology) that analyzes web pages for their accessibility to people with disabilities as well as their compatibility with various browsers. You can use Bobby free of charge at: <http://www.cast.org/bobby>

**THIS CHECKLIST IS AVAILABLE IN ALTERNATE FORMAT UPON REQUEST.**

**Revised January 2000  
Disability Resource Center  
Drake University  
2507 University Avenue  
Des Moines, IA 50311  
(515) 271-3100**

**For a copy of “The Americans with Disabilities Act Checklist for  
Readily Achievable Barrier Removal: Checklist for Existing  
Facilities version 2.1 - August 1995” please call**

**1-800-949-4ADA**

**your call will be rerouted to the DBTAC in your area.**

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**APPENDIX B**  
Position Analysis Form  
Service Position Description Form  
Definitions: Essential vs. Marginal Functions

## **POSITION ANALYSIS FORM**

A position analysis is a systematic way to gather and assess information about the content of a position, the human requirements needed to perform it, and the context in which it is performed. It is critical to understand the tasks, duties, and responsibilities of a position to assist with determining what knowledge, skills and abilities are needed. Most methods of position analysis require that a knowledgeable person describes what goes on in the position or makes a series of judgments about the specific activities required to do the position. Information can be gathered from individuals who have performed the position, the supervisor, and from observation. When completing the following form, please be as specific as possible and note examples where appropriate.

Program Name: \_\_\_\_\_

Contact Person: \_\_\_\_\_ Phone: \_\_\_\_\_

Position Title: \_\_\_\_\_ Shift hours: \_\_\_\_\_

Educational Requirements (Include the educational requirements for the position. Do not indicate the current member's educational level): \_\_\_\_\_

Work Experience Requirements (Include the experience/training requirements for the position. Do not indicate the current member's experience level): \_\_\_\_\_

**Briefly State Purpose of the Position:**

**List Position Tasks:** Please list the tasks necessary to perform the position. Include specific information regarding how often the task is performed. Be sure to include periodic service activities. Attach additional sheet if needed.

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.
- 9.
- 10.

**Physical Requirements:**

Assess physical demands of the position utilizing the following frequency indicators: “Not at All” (N), “Occasionally” (O) less than 1/3 time spent, “Frequently” (F) 1/3 to 2/3 time spent, and “Continuously”(C) greater than 2/3 time spent.

	Frequency (N,O,F,C)	Comments
<b>1. Strength</b>		
<u>Lifting</u>		
Sedentary: Up to 10 lbs.		
Light: 10-20 lbs.		
Medium: 21-50 lbs.		
Heavy: 51-100 lbs.		
Very Heavy: Over 100 lbs.		
<u>Carrying</u>		
Light: Up to 10 lbs.		
Medium: 11-25 lbs.		
Heavy: 26-50 lbs.		
Very Heavy: Over 50 lbs.		
<u>Pushing/Pulling</u>		
Up to 10 lbs.		
10-24 lbs.		
25-49 lbs.		
50-100 lbs.		
Over 100 lbs.		
<b>2. Climbing</b>		
Ladder		
Steps		
Other		
<b>3. Lower Extremities</b>		
Stooping		
Squatting		
Crawling		
Kneeling		
Balancing		
Bending		
Twisting (list body part)		
Foot Movements		
<b>4. Upper Extremities</b>		
Reaching (note type & level)		
Twisting (list body part)		
Grasping		
Fine Manipulating		
<b>5. Hearing Requirements</b>		
<b>6. Speaking Requirements</b>		

	Frequency (N,O,F,C)	Comments
7. Sight Requirements		
8. Sitting		
9. Standing		
10. Walking		

**Environmental Conditions:** Please describe the conditions of the environment (e.g. inside/outside, wet conditions, noise, hazards, heights, lighting, floors, etc.).\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Machines, Tools, Equipment, Service Aids:** Please list those used.\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Contact with Others:** Please discuss and list the type of interaction with others. Be specific about the responsibility of supervision of others and the extent to which this position is supervised.\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Problem Solving and Reasoning:** Please discuss specific types of independent judgment or reasoning tasks required for the position.\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Stress Level and Work Speed:** Please describe the level of stress involved with the position and the pace of service tasks. Provide specific examples.\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Other Information:** Please include any other relevant information about the position which has not otherwise been included.\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date Position Analysis Completed:\_\_\_\_\_

Completed By:\_\_\_\_\_

Methods of Gathering Data (i.e. list individuals interviewed, observation, etc.):\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

## **SERVICE POSITION DESCRIPTION**

<b>Position Title:</b>	Identify the name of the position; identify full time or part time.
<b>Reports To:</b>	Identify position title of the immediate supervisor.
<b>General Summary:</b>	In narrative form, briefly describe the major functional position responsibilities.
<b>Essential Functions:</b>	Define basic duties that must be performed with or without reasonable accommodation. Identify only the functions or tasks that are essential or fundamental to performance. Identify prompt, regular attendance.
<b>Additional Duties:</b>	Describe other duties that are marginal or incidental to essential functions.
<b>Principal Working Relationships:</b>	Identify major relationships required for position to accomplish responsibilities including internal and external work relationships.
<b>Knowledge, Skills, &amp; Abilities:</b>	Identify the minimum skills, specific areas of knowledge and abilities that an individual is required to possess to be qualified to fill the position.
<b>Qualifications:</b>	Identify academic qualifications and related experience needed as a minimum to be qualified for the position.
<b>Working Conditions:</b>	Identify conditions under which the position must be done and the extent to which the conditions make the position desirable or undesirable. Consider any special hazards such as safety and security factors that may have an impact on the performance of the position.
<b>Physical, Emotional, &amp; Intellectual Demands:</b>	Identify the degree of physical, mental and intellectual demands applied to the position requirements.
<b>Equipment Used:</b>	Identify the types of tools, equipment, and aids that are used in position performance.

All of the above duties and responsibilities are essential position functions subject to reasonable accommodation. All position requirements listed indicate the minimum level of knowledge, skills and/or ability deemed necessary to perform the duties proficiently. This position description is not to be construed as an exhaustive statement of duties, responsibilities, or requirements. Individuals may be required to perform any other position-related instructions as requested by their supervisor, subject to reasonable accommodation. This position description is not all inclusive.

Approval:

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AmeriCorps Program Director

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Date

## Essential vs. Marginal Functions

**Essential Functions:** are those tasks or functions of a particular position that are fundamental to the position (as opposed to marginal). Understanding what is essential to a position will aid in determining qualified applicants and formulating interview questions. In identifying essential functions, be sure to consider (1) whether members in the position are actually required to perform the function, and (2) whether removing that function would fundamentally change the position. The following list includes several reasons why a function could be considered essential:

- The position exists to perform the function (e.g., if you hire someone to proofread documents, the ability to proofread accurately is an essential function, since this is the reason that the position exists).
- There are a limited number of members available to perform the function, or among whom the function can be distributed (e.g., it may be an essential function for a file clerk to answer the telephone if there are only three members in a very busy office and each member has to perform many different tasks).
- If a function is highly specialized and the person in the position is placed for special expertise it could be considered essential (e.g., a company expanding its business with Japan is hiring a new salesperson, so it would be essential that someone not only have sales experience but also have the ability to communicate fluently in the Japanese language).

To identify the essential functions of the position, first identify the purpose of the position and the importance of the tasks required in achieving this purpose. In evaluating the “importance” of position functions, consider the frequency with which a function is performed, the amount of time spent on the function, and the consequences of not performing the function.

*In defining the essential functions of a position, it is important to distinguish between methods and results. For example, is the essential function “moving” a fifty pound box from one part of the lab to another, or is it “carrying” the box? While essential functions need to be performed, they often do not need to be done in one particular manner (unless doing otherwise would create an undue hardship).*

**Marginal Functions:** are those tasks that are performed but are not essential to the position. It may be necessary to reassign or trade marginal functions among members within a given work site.

(Adapted from “Guidelines for Writing Job Descriptions,” Rice University Human Resources.)

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## APPENDIX C

Guidelines For Position Interviews: Responsibilities & Rights  
Interview Do's & Don'ts  
Appropriate & Inappropriate Interview Questions

# **GUIDELINES FOR POSITION INTERVIEWS**

## **AS AN AMERICORPS PROGRAM, YOU HAVE RESPONSIBILITIES**

- You must focus on the ability of the applicant to do the position. Do not focus on the disability of the applicant.
- You must not make medical inquiries regarding an individual's disability.
- You must make position applications and interview facilities accessible to individuals with disabilities.
- You must provide an applicant with a disability with a reasonable accommodation in an interview when requested. You can require medical documentation.

### **ADA INTERVIEWING GUIDELINES**

- **Ask only about ability to do the position.**
- **You can ask about both essential and marginal position functions.**
- **You cannot ask about the disability.**
- **You can ask how a person would do the essential functions.**
- **You can ask if the applicant can meet attendance expectations.**

## **AS AN AMERICORPS PROGRAM, YOU HAVE RIGHTS**

- You may ask if an individual can perform essential functions of the position.
- You may ask how an individual will perform essential position functions.
- You may ask about specific experience.
- You may ask about position requirements.
- You may identify attendance needs and ask if an applicant can meet attendance requirements.
- You have the right to request specific, relevant medical documentation when an individual indicates a need for a reasonable accommodation.
- You can ask about marginal position functions.

*(Adapted from "The Americans with Disabilities Act: Employer/Employee Rights and Responsibilities-A Guide for Iowa" Published by the Client Assistance Program, Division of Persons with Disabilities and the Iowa Department of Human Rights)*

## **Interview Do's and Don'ts**

In general, interviewing an individual with a disability should be no different than interviewing an individual without a disability. Applicants will want to talk about what they can bring to the program and how they can benefit from it. It is helpful to deal with concerns in a straightforward, matter-of-fact manner. Some reminders:

- There are always at least two ways to do something.
- If any information is volunteered by the individual about his/her disability, maintain confidentiality.

### **Interview “Do’s”**

- Adhere to etiquette such as extending a handshake or physical contact to an individual with quadriplegia, short arms, a prosthesis, or blindness.
- Maintain eye contact with the individual with a disability even if they are blind or are using an interpreter.
- Give the applicant your undivided attention.
- Do not be afraid to offer assistance.
- Use appropriate language such as “disability” instead of “handicap,” “uses a wheelchair” instead of “confined to a wheelchair,” “individual with a disability” instead of “disabled individual.”
- Ask about education, work experience, skills, licenses or certificates that are relevant to the service position.
- If you ask one applicant to demonstrate his/her ability or skill then you should ask all applicants to demonstrate an ability or skill.

### **Interview “Don’ts”**

- Do not ask any questions directly or indirectly related to the existence, the nature, severity, cause, prognosis, need for leave, or past attendance record because of a disability.
- Do not make any assumptions about limitations.
- Do not lessen expectations or standards, but be willing to offer reasonable accommodations so they can be met.

## Appropriate and Inappropriate Interview Questions

Be prepared for an interview by having a list of questions tied to the individual's ability to perform an essential function that makes no reference to disability. You should plan to ask all applicants the same questions. There are some questions that are considered illegal because they might directly or indirectly reveal disability. While these questions may not appear discriminatory, a person's answers may disclose information about health, sources of income or other issues which may reveal disability.

<u>Questions You Can Ask</u>	<u>Question You Cannot Ask</u>
<p>I. General Questions</p> <ul style="list-style-type: none"> <li>• Tell me about yourself.</li> <li>• What are your greatest strengths and weaknesses?</li> <li>• Tell me about your interests.</li> <li>• What do you see yourself doing in 5 years?</li> </ul> <p>II. Questions about Performing Essential Functions</p> <ul style="list-style-type: none"> <li>• Are you able to perform the essential functions of this position with or without reasonable accommodation?</li> </ul> <p><b>Note:</b> This question is to be answered yes or no. The applicant is not required to disclose if an accommodation is needed.</p> <p>Examples of specific duties:</p> <ul style="list-style-type: none"> <li>* Can you type/file/answer phones/etc.?</li> <li>* This position involves doing X at Y speed. Can you do X at Y speed?</li> <li>* This position involves taking information over the phone and entering it into a computer. Can you do that?</li> <li>* This position requires moving construction materials weighing 15 pounds to build trails. Can you do that?</li> <li>* This position requires reading to children. Can you do that?</li> </ul> <p>III. Questions about an Accommodation</p> <p>If an applicant volunteers that he/she can perform the task with an accommodation, then you may ask:</p> <ul style="list-style-type: none"> <li>• What accommodations will you need to perform this task?</li> </ul>	<p>I. General Questions</p> <ul style="list-style-type: none"> <li>• Tell me about your disability.</li> <li>• Tell me about your health and medical history.</li> <li>• Describe any physical or mental problems or disabilities you have.</li> <li>• Have you ever received worker's compensation, SSDI or SSI?</li> <li>• Are you taking any prescribed drugs?</li> <li>• Have you ever been hospitalized?</li> <li>• How many days were you absent from work for illness last year?</li> </ul> <p>Questions about Performing Essential Functions</p> <ul style="list-style-type: none"> <li>• Do you have any disabilities, impairments or illnesses which may affect your performance in this position?</li> <li>• How can you perform these duties with your handicap?</li> </ul> <p>Examples of specific duties:</p> <ul style="list-style-type: none"> <li>* How do you drive a car?</li> <li>* How can someone with your disability drive a truck?</li> <li>* How can you manage playground duty when you can't see?</li> <li>* How can you clear trails, dig a ditch, pull weeds, mow lawns with your handicap?</li> <li>* What kinds of help will we have to give you so that you can do these tasks?</li> </ul> <p>Questions about an Accommodation</p> <ul style="list-style-type: none"> <li>• To do this job you will obviously need accommodations. Which ones will you need?</li> </ul>

*(Adapted from World Institute on Disability, Disability Demonstration Project Oakland, CA)*

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## APPENDIX D

Application For Iowa Commission Accommodation Funds  
Guidelines For Determining Reasonable Accommodations: Responsibilities & Rights

**IOWA COMMISSION ON VOLUNTEER SERVICE  
APPLICATION FOR REASONABLE ACCOMMODATIONS FUNDS**

**Please answer all questions with the assistance of the individual requesting the reasonable accommodation. Alternate formats for this application are available upon request.**

Program Name: \_\_\_\_\_

Street Address: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_ E-Mail: \_\_\_\_\_

Contact Person: \_\_\_\_\_

Program Type: \_\_\_ National Direct \_\_\_ State Competitive \_\_\_ Ed Award Only \_\_\_ State Formula\*

\*Under current legislation (1999), formula programs cannot access state commission funds. The Iowa Commission suggests that formula programs designate 1% of total program budget for accommodations.

Status of Individual with Disability

\_\_\_ Applicant for AmeriCorps Position      \_\_\_ Current AmeriCorps Member

Date Accommodation is Needed \_\_\_\_\_

Please describe the requested reasonable accommodation and how it will allow the applicant/member to perform a primary service function or participate in program activities.

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Cost of the accommodation: \_\_\_\_\_

Amount of Iowa Commission funds requested: \_\_\_\_\_

Please describe any efforts made to find alternative funding or cost sharing for the accommodation requested.

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Will more than one individual benefit from the reasonable accommodation? If yes, please describe.

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Has this program previously received Iowa Commission funds for reasonable accommodation? If yes, please describe the circumstances.

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\_\_\_\_\_  
Program Director

\_\_\_\_\_  
Date

Please send the completed form to the following address:

Jack C. Porter, Program Coordinator  
Iowa Commission on Volunteer Service  
200 E. Grand Avenue  
Des Moines, IA 50309  
Voice: (515) 242-5467, Fax: (515) 242-4809  
TTY: use Relay Iowa 1-800-735-2942

**Please Note:** Each applicant/member with a disability who requests a reasonable accommodation must be informed of the right to appeal any decision to deny a reasonable accommodation request.

# **GUIDELINES FOR DETERMINING REASONABLE ACCOMMODATION**

## **AS AN AMERICORPS PROGRAM, YOU HAVE RESPONSIBILITIES**

- You must consider a reasonable accommodation for an individual with a disability when such an accommodation enables the person to carry out the essential functions of the position.
- You must provide reasonable accommodation when requested to enable an individual with a disability to participate in the application process.
- You must provide a reasonable accommodation to enable an individual with a disability to participate in an interview.
- You must provide a reasonable accommodation to enable an individual with a disability to participate in program-sponsored activities.
- You may not force an individual with a disability to accept an accommodation if the individual with a disability did not request or need an accommodation.
- If you choose not to provide the accommodation you must be able to document that the accommodation would cause you undue hardship.
- You must consider alternate resources (such as tax incentives) before claiming an accommodation causes undue hardship.

### **EXAMPLES OF REASONABLE ACCOMMODATION**

- **Making facilities accessible.**
- **Making written or oral communications accessible.**
- **Changing how or when an essential function is done.**
- **Eliminating marginal functions.**
- **Restructuring a position.**
- **Modifying work schedules.**
- **Providing flexible leave policies.**
- **Reassigning to a vacant position.**
- **Modifying equipment and devices.**
- **Using assistive technology.**
- **Modifying exams, policies, training materials.**
- **Providing qualified readers or interpreters.**

*(Adapted from "The Americans with Disabilities Act: Employer/Employee Rights and Responsibilities-A Guide for Iowa." Published by the Client Assistance Program, Division of Persons with Disabilities and the Iowa Department of Human Rights)*

# **GUIDELINES FOR DETERMINING REASONABLE ACCOMMODATION**

## **AS AN AMERICORPS PROGRAM, YOU HAVE RIGHTS**

- You do not have to provide an accommodation for an individual with a disability if it poses an undue hardship for you.
- You do not have to provide an accommodation for an individual with a disability if the individual with a disability does not ask for one.
- You do not have to eliminate essential functions of the position to accommodate an individual with a disability.
- You can ask for specific and relevant medical proof to justify the need for an accommodation for an individual with a disability.
- You do not have to lower production standards as a reasonable accommodation.
- You can suggest accommodations, but you do not have to research for an accommodation.
- You can choose any accommodation, as long as it is effective. You do not have to choose the first or most expensive accommodation.
- You do not have to provide an accommodation to an individual with a disability who is not otherwise qualified.
- You do not have to supply personal use items (such as eyeglasses or wheelchairs) as an accommodation. You do not have to provide accommodation if no disability is known.

### **UNDUE HARDSHIP**

**An AmeriCorps program is not required to make reasonable accommodation for a person with a disability if it poses an undue hardship. Undue hardship is considered an excessive cost, or an extensive, substantial, disruptive, or a fundamental alteration of the nature or operation of the program.**

**Undue hardship is determined by a number of factors including:**

- **The nature and cost of the accommodation.**
- **The overall financial resources of the employer.**
- **The overall financial resources of the parent company.**
- **The impact of the accommodation on the operation of the program.**

*(Adapted from "The Americans with Disabilities Act: Employer/Employee Rights and Responsibilities-A Guide for Iowa." Published by the Client Assistance Program, Division of Persons with Disabilities and the Iowa Department of Human Rights)*