

Definitions and Additional Information:

Aids and Services:

Aids and Services may include materials in alternative format such as large print, braille, additional time or assistance to complete an application, written notes rather than spoken conversation, or a sign language interpreter.

These examples are not meant to be an exhaustive list.

Aids & Services and modifications are provided free of charge:

Best practice: proactively budget for aids and services such as sign language interpreters, braille, transcription, readers, and assistive listening systems.

Purchase systems rather than services when possible.

For Example:

Purchase a braille machine rather than paying per document.

Purchase a transcription machine to create multiple transcriptions.

These examples are not meant to be an exhaustive list.

City of Philadelphia entities:

The policies and procedures do not include quasi-public agencies and authorities. As separate authorities which receive federal funding, they are directly responsible for maintaining compliance with federal laws and regulations governing accessibility:

- Transportation Services for Individuals with Disabilities (SEPTA)
- Fair Housing, Residential, and Long-term Care Facilities (PHA)
- Education (School District)
- Philadelphia Redevelopment Authority
- Philadelphia Industrial Development Corporation

Director of ADA Compliance Contact and statement:

The City of Philadelphia has designated the Director of ADA Compliance, as the entity to coordinate the responsibilities related to the ADA. You may contact the Director of ADA Compliance using the following information:

Director of ADA Compliance, City of Philadelphia
1400 John F Kennedy Blvd.
City Hall, RM 112
Philadelphia, PA 19107
ADA.Request@phila.gov

Reasonable modifications can be entered at: phila.gov/reasonable-modification
Grievances can be entered at: phila.gov/ADA-grievance

Employees with disabilities

Information about Title I reasonable accommodations for employees can be found at <https://www.phila.gov/personnel/ADAFAQ.html>

Individual with a disability for the purposes of a modification:

The ADA defines a person with a disability as a person who has a physical or mental impairment that substantially limits one or more major life activities.

When determining disability consider the following:

I. Does the person have an impairment?

Physical impairments affect bodily systems such as nerves, muscles, and immune system. Mental impairments include emotional or mental illness, behavioral disorders, and autism. Physical and mental impairments often overlap. For example, an injury can affect the brain, spinal cord and nervous system, which can influence emotional regulation and learning.

II. Does the impairment substantially limit major life activities?

An impairment is only a disability if it causes a limitation to a major life activity. Major life activities are activities essential to daily life such as walking, breathing, learning, and many others. An impairment is “substantially limiting” if the person cannot perform the major life activity the way an average person can. The “substantially limits” standard is not to be overly restrictive.

The ADA Amendments Act of 2008 requires that the definition of disability be interpreted broadly and should not require extensive analysis.

Reasonable modification – Review

“Reasonable” in the phrase “reasonable modification”:

Reasonable means that there is a connection between the request and the disability.

Examples:

A person who is blind may request someone to read a document while at an appointment with a City employee.

A person who is deaf or hard of hearing may ask for a sign language interpreter or assistive listening device.

A person with a mobility disability may ask for a meeting to be held in an accessible location.

These examples are not meant to be an exhaustive list of examples.

A request may not be reasonable if the request can be met in a different, but equally effective, manner. The City will consider the residents preference when determining which modification is reasonable.

The City does not provide individually prescribed devices or services that are not available to other, non-disabled, people.

For example:

Joel is not able to remove the snow from his sidewalk due to his disability; therefore, he asked the City to shovel the snow. Because the City does not provide this service for any resident, the City will not provide the service as modification.

This example is not meant to be an exhaustive list.

“Modification” in the phrase “reasonable modification”:

A modification is a change in the way the City currently operates that is necessary for a qualified person with a disability to have an equal opportunity to participate in civic activities.

Record Retention:

All information related to disability requests is confidential.

The City department will provide a copy of any written correspondence related to reasonable modification requests to the Director of ADA Compliance and department ADA Liaison.

Requests to access disability related documents or information from entities not related to the City shall be made to the Director of ADA Compliance.

Documents will be maintained in accordance with the record retention schedule.

Signage:

- I. Accessible entrances and restrooms must be marked with the international symbol for accessibility.
- II. A sign that depicts the international access symbol and an arrow pointing in the direction of the closest accessible entrance or element must be placed at all inaccessible public entrances and bathrooms.
- III. Signs must be designed and placed according to standards in the 2010 ADA and other relevant laws.

“Qualified” in the phrase “Qualified” Individual with a disability:

For participation in programs, services and activities of the City, a person is qualified if they meet the eligibility requirements of the program, service or activity.

Undue Burden:

The ADA does not require any action that would result in a fundamental alteration to the nature of the program or activity, would create a direct threat, or would cause an undue financial or administrative burden.

Additional information:

- I. Undue burden: If removing a barrier would be burdensome, then the department will consider if access or services can be provided in another form.
- II. Direct threat: Must be based on real, rather than perceived, threat and consider if the threat can be eliminated.