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CFDA NO : 133D
PROGRAM TITLE : KNOWLEDGE, DISSEMINATION & UTILIZATION
PR/AWARD NO : H133D10131

TO THE APPLICANT;

YOUR APPLICATION HAS BEEN RECEIVED BY THE
APPLICATION CONTROL CENTER. PLEASE REFER TO PR/AWARD
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ED 80-0003; Revised 12/88

OMB Approval No. 0348-004

1. TYPE OF SUBMISSION: Application ☐ Construction ☒ Non-Construction		2. DATE SUBMITTED August 5, 1991		Applicant Identifier N/A	
3. DATE RECEIVED BY STATE		State Application Identifier			
4. DATE RECEIVED BY FEDERAL AGENCY		Federal Identifier			
5. APPLICANT INFORMATION					
Legal Name: The Institute for Rehabilitation and Research			Organizational Unit: Independent Living Research Utilization		
Address (give city, county, state, and zip code): PO Box 20095 Houston, Harris County Texas 77225			Name and telephone number of the person to be contacted on matters involving this application (give area code) Lex Frieden (713) 797-5283		
6. EMPLOYER IDENTIFICATION NUMBER (EIN): ☐ - ☐ 7 ☐ 4 - ☐ 1 ☐ 3 ☐ 3 ☐ 4 ☐ 6 ☐ 7 ☐ 8 - ☐ ☐			7. TYPE OF APPLICANT: (enter appropriate letter in box) ☒ N A. State B. County C. Municipal D. Township E. Interstate F. Intermunicipal G. Special District H. Independent School Dist. I. State Controlled Institution of Higher Learning J. Private University K. Indian Tribe L. Individual M. Profit Organization N. Other (Specify): non-profit rehabilitation hospital		
8. TYPE OF APPLICATION: ☒ New ☐ Continuation ☐ Revision If Revision, enter appropriate letter(s) in box(es): ☐ ☐ A. Increase Award B. Decrease Award C. Increase Duration D. Decrease Duration Other (specify):			9. NAME OF FEDERAL AGENCY: U.S. DEPARTMENT OF EDUCATION		
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: TITLE: Knowledge Dissemination and Utilization Program			11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT: Regional Disability Business Accommodation Center--Region VI		
12. AREAS AFFECTED BY PROJECT (cities, counties, states, etc.): Department of Education Federal Region #VI					
13. PROPOSED PROJECT: Start Date: 10-1-91 Ending Date: 9-30-96		14. CONGRESSIONAL DISTRICTS OF: a. Applicant: 18. b. Project: 18			
15. ESTIMATED FUNDING: a. Federal: \$ 324,858.00 b. Applicant: \$ 102,804.00 c. State: \$.00 d. Local: \$.00 e. Other: \$.00 f. Program Income: \$.00 g. TOTAL: \$ 427,662.00		16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS? a. YES THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE _____ b. NO. ☒ PROGRAM IS NOT COVERED BY E.O. 12372 ☐ OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW			
17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT? ☐ Yes If "Yes," attach an explanation. ☒ No					
18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT, THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED					
a. Typed Name of Authorized Representative Louisa Adelung			b. Title Executive Vice-President and COO		c. Telephone number (713) 797-5280
d. Signature of Authorized Representative <i>Louisa Adelung</i>			e. Date Signed 8-5-91		

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E-1

SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Knowledge Dissemination & Utilization Program	84.133D	\$	\$	\$ 324,858	\$	\$ 324,858
3.						
4.						
5. TOTALS		\$	\$	\$ 324,858	\$	\$ 324,858
SECTION B - BUDGET CATEGORIES						
6 Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY				Total (5)	
	(1)	(2)	(3)	(4)		
a. Personnel	\$	\$	\$	\$	\$ 98,659	
b. Fringe Benefits					26,145	
c. Travel					7,820	
d. Equipment					2,800	
e. Supplies					6,000	
f. Contractual					36,000	
g. Construction					-0-	
h. Other					126,245	
i. Total Direct Charges (sum of 6a - 6h)					303,669	
j. Indirect Charges					21,189	
k. TOTALS (sum of 6i and 6j)	\$	\$	\$	\$	\$ 324,858	
7. Program Income	\$	\$	\$	\$	\$	

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SOUTHWEST REGIONAL DISABILITY AND BUSINESS ACCOMMODATION CENTER (RDBAC)

(a) Potential Impact of Outcomes: Importance of the Program

(1) Relationship to Announced Priority. The activities of the proposed Region VI Regional Disability and Business Accommodation Center (RDBAC) relate directly to NIDRR's announced priority for establishing and operating regional disability and business accommodation centers. The proposed RDBAC will address ADA-related informational needs for Region VI, comprised of Arkansas, Louisiana, New Mexico, Oklahoma, and Texas. Specific activities to address ADA-related informational needs are discussed in detail under Section C (Program/Project Design), and entail establishing a RDBAC that will coordinate development and support of state and local resource groups.

To operate the RDBAC, ILRU has formed partnerships with the Better Business Bureau (BBB) and with The University of Texas at Austin School of Business. To the partnership, ILRU brings knowledge of disability issues, experience in designing and conducting disability-related training and technical assistance, and access to organizations serving people with disabilities. The BBB brings a membership of 35,000 business and 31 member offices located in the five-state region and experience in delivering timely and useful information to business and consumers. BBB also delivers to the partnership direct and immediate access to a network of over 700,000 member and nonmember businesses within the five-state region. The University of Texas School of Business contributes extensive experience in conducting applied research and providing training targeted specifically to business professionals. These partnerships provide ILRU with access to expert assistance in developing training targeted specifically to business professionals and will increase the likelihood that methods and formats are appropriate and take into account the special needs of this target audience.

In general, the RDBAC will perform the four basic functions--disseminate information, provide technical assistance, provide referrals for specialized information, and conduct training--required of all RDBACs. These functions will be carried out through development of an extensive network of business groups, disability organizations, governmental bodies, non-profit service agencies, educational institutions, the public media, and representatives of the general public. The processes through which this network will be established and operated and specific objectives to be addressed through RDBAC activities are discussed in detail under Section C, Program/Project Design.

(2) Likelihood of Producing New and Useful Information. Although the proposed RDBAC is not a research project in the traditional sense of the word, a great deal of new and useful information is expected to be produced. For example, a portion of the activities to be carried out through the RDBAC are designed to assess the extent to which ADA-related information is available to businesses, people with disabilities, people in government, and elsewhere. Additionally, the evaluative activities of the RDBAC will focus on identification of ADA provisions and implementing regulations that pose particular difficulties for covered entities, so that strategies for minimizing such difficulties can be formulated and tested.

In this regard, the RDBAC activities will be augmented with research data generated through ILRU's NIDRR-funded field-initiated research (FIR) project, begun in June 1991, to assess the capabilities of staffs of independent living centers to provide ADA-related services to consumers, businesses, and others in their communities. The results of activities carried out through the proposed RDBAC and ILRU's ADA-related FIR project will provide a wealth of new data on ADA implementation that can be used in developing innovative strategies for ADA compliance and for evaluating and refining regulations put in place to facilitate implementation of the legislation. Details on the types of new information to be generated through RDBAC activities and possible uses

of such information are provided in Section E, Evaluation Plan.

(3) Need and Target Population. On July 26, 1990, President George Bush signed Public Law 101-336, known as the Americans with Disabilities Act (ADA). This historic event ushered in a new age of opportunity for Americans who have disabilities. It also offered a new set of challenges to businesses and private and public service organizations to demonstrate in concrete ways what they are doing to assure that they are not discriminating--intentionally or unintentionally--against persons with disabilities in terms of employment, access to services, or in other ways that diminish opportunities available to people with disabilities. ADA is designed to insure rights of persons with disabilities under four specific and one general section of the Act that are briefly summarized in an appendix to this proposal.

At present there are no definitive data on the numbers of organizations in the public and private sectors that are actively seeking information on ADA, its provisions, and regulations. Through its extensive contacts with individuals in the field of independent living, ILRU has gathered information suggesting that the more than 350 consumer-controlled independent living centers operating nationwide are dealing with thousands of requests daily. Over the past year and one half, ILRU has been querying center managers participating in its management training programs concerning the numbers of ADA-related information requests that they have been receiving. Responses to these queries indicate that independent living centers that were receiving only a few calls per month during the days when ADA legislation was being considered in Congress are now receiving daily requests for ADA-related information from persons with disabilities, employers, and numerous public and private concerns. Managers from some centers have indicated that their staffs are being inundated with calls from a wide range of individuals in their communities wanting to know what ADA means for them and, in the case of employers and other businesses, what they will be required to do in order to be in compliance with ADA (ILRU, 1990).

These reports from the field led ILRU to request and receive a field-initiated research (FIR) grant previously referenced. Results of this FIR project will strengthen the efforts of the proposed RDBAC by further defining the quantity and quality of information on ADA available to people working in independent living centers and by identifying questions concerning ADA and its provisions that are difficult to answer.

As regards the quantity and quality of information on ADA currently available to business people, there is little firm data available. ILRU staff and collaborators on the project are very aware of the amount of information available (see review of literature in the appendix) and seminars and conferences being conducted by legal firms and other "experts" on ADA. The prices being charged for these information-sharing programs range from small (e.g., under \$50 per person) to quite large (e.g., more than \$1,000 per person). However, with ADA-related regulations having been only recently developed by most federal agencies, it is certain that much of the information presented during earlier offerings on ADA was speculative in nature, based upon individual perceptions of what the regulations would require. In fact, communication with Mr. John Etchieson of the Austin Better Business Bureau indicates that their member businesses have been contacted with offerings by legal firms to provide ADA training or information, usually at relatively high participant cost and often focusing on ways to avoid or circumvent ADA provisions rather than on options for coming into compliance.

With these observations as a basis, the proposed project has identified a number of audiences that will be targeted through activities of the RDBAC. The primary target audience will be businesses in the five-state area. The rationale for focusing on businesses is based on a number of factors, including:

- there are an estimated 700,000 businesses in the five-state area (BBB estimate);
- many businesses may perceive ADA as threatening because of lack of understanding of its provisions and the meaning of these provisions to them;
- businesses may be getting inaccurate information concerning the ADA, its requirements for reasonable accommodation and accessibility modifications, and options available to them in and costs involved; and
- inaccurate information on ADA provided to businesses may contribute to negative impressions of the intent and requirements of ADA and may result in negative "backlash" if business people are not provided with accurate information on the actual ADA requirements and options available for compliance with it.

Although the primary audience for RDBAC activities is business organizations in the five-state region, other important audiences that will be targeted by RDBAC activities include individuals with disabilities and organizations representing them, state and local governments, non-profit service agencies, educational institutions, and the general public. Individuals with disabilities and organizations representing them have been the primary targets of ILRU's efforts since its inception in 1978. ILRU has developed a reputation for providing high quality and usable information to consumer-controlled organizations on a wide variety of topics ranging from disability rights to organizational management. ILRU has developed close working relationships with all 24 independent living centers in the five-state region and has provided direct training to staff of 17 of these centers. ILRU communicates regularly with these centers through its bi-monthly newsletter ILRU Insights and through a variety of other mechanisms, including computerized bulletin boards, special mailings, and frequent telephone contact.

The independent living centers will provide the primary but not the only avenue for communicating with people with disabilities in the five-state region. ILRU also has established functional contacts with: state coalitions of people with disabilities, such as the Coalition of Texans with Disabilities; state governor's committees on persons with disabilities; various organizations (e.g., United Cerebral Palsy, Developmental Disabilities Councils) serving people with disabilities; and with a variety of other individuals and groups involved in disability issues. These contacts will be exploited for this project.

The other target audiences--state and local governments, non-profit service agencies, educational institutions, and the general public--are also groups with which ILRU has substantial experience. ILRU's efforts to provide disability-related information to a wide range of audiences have grown continuously. These efforts involve more than 13,000 mailings per year. A cursory review of requests during the past year indicates that approximately 40 percent of the requests for information come from independent living centers, 30 percent from other disability-related service providers, 10 percent from educational institutions, 10 percent from state and local governments, and the other 10 percent from a variety of sources, including the general public.

With implementation of the RDBAC, efforts to work with state and local governments, other community-based service agencies, and educational institutions in the five-state region will be stepped up to assure that accurate information is being conveyed to people who are involved with policy making, service delivery, and preparation of people who will be assuming professional roles in which knowledge of ADA and its provisions is essential.

In defining the target populations to be addressed through RDBAC activities, it is important to emphasize that the primary purpose of the RDBAC will be to foster mutual

understanding among the various parties affected by ADA. In order to do this, cooperative endeavors involving persons with disabilities, members of the business community, educators, policy makers, and others will need to be undertaken so that balanced and accurate information on ADA and its meaning to individuals and organizations can be disseminated effectively. The plans for the RDBAC describe how such endeavors will be undertaken.

(4) Benefit of Outcomes to Target Populations. As implied in the previous paragraphs, ADA's potential to be a positive force in opening opportunities for people with disabilities to participate more fully in the full range of activities (e.g., employment, recreation, commerce) in their communities will be influenced to a large degree by the extent to which effective ways of informing people concerning individual rights under ADA and options for insuring that those rights are not violated can be developed and implemented. The benefits to audiences specifically targeted for RDBAC activities include,

For businesses, enhanced understanding of requirements under ADA regarding:

- specific provisions of ADA, entities covered by ADA, and time frames for implementation of ADA and its regulations;
- employment of persons with disabilities, options available in making reasonable job accommodations, and areas of the law in which requirements are not clear and have not yet been put to the test in court;
- accessibility by persons with disabilities who may be consumers of business products and services;
- various options, including costs, in making reasonable accommodations and business accessibility modifications;
- options, other than legal action, for resolving disputes arising from accusations of discriminatory practices;
- legal recourse available in the event of accusations of discriminatory practices in hiring, management, or day-to-day business operations; and
- sources of information on ADA and its provisions and regulations and on resources available to assure compliance with the law, including information on accommodation and accessibility options and their short-term and long-term costs.

For persons with disabilities and organizations representing them, accurate information on:

- specific provisions of ADA, entities covered by ADA, and time frames for implementation of ADA and its regulations;
- sources of assistance in dealing with employers, businesses, government agencies, and other organizations that may be limiting access because of a lack of knowledge or understanding of ADA requirements;
- options that can be presented to employers, businesses, government agencies, and others for coming into compliance with ADA through steps that take into account costs and other available resources;
- effective strategies, in addition to legal action, for settling disputes arising from perceived discriminatory practices;

- legal recourse and paths for pursuing such should other means of dispute resolution fail in cases of perceived discriminatory practices; and

- sources of information on ADA and its provisions and regulations and on innovative approaches that have been used in reasonable accommodation and in improving accessibility throughout their communities.

For state and local governments information on:

- questions of access to public facilities and services;
- resources and strategies for creating full access to public facilities and services;
- responsibilities for monitoring and enforcing compliance with ADA provisions and regulations at state and local levels;
- types of sanctions and their implications for state and local government bodies that fail to come into compliance with ADA provisions and regulations;
- options, other than legal action, for resolving disputes arising from alleged non-compliance with ADA on the part of state and local governments;
- legal recourse available to state and local governments accused of discriminatory practices relating to disability; and
- sources of assistance on the implications of ADA and its provisions for state and local governments and on practical strategies for coming into compliance with the legislation.

For educational institutions, benefits from this project will include:

- acquisition of current materials on ADA and its provisions for use in teaching students in business programs and in disability-related programs of study, including rehabilitation counseling;
- development of a cadre of informed business people, people with disabilities, and others knowledgeable about ADA and its provisions who can serve as lecturers and resource people for educational activities;
- opportunities to identify sites for research on effective strategies for reasonable accommodation and enhanced accessibility in a variety of business settings;
- expanded contacts with people in a variety of business settings who can assist with placement of students--with and without disabilities--in learning practical and in entry-level jobs following completion of studies; and
- establishment of outlets in the business and disability communities for disseminating research results focusing on reasonable accommodation and improved accessibility to products and services; and

For the general public, the project will have benefits in:

- increasing awareness of the contributions that people with disabilities can make to their communities;
- fostering employment of people with disabilities, thereby reducing funding

required for public benefit programs targeted to unemployed persons and increasing income and related tax revenues; and

- opening a wide variety of options for people who may, in the future, experience disabilities themselves or with family members--this is particularly true for older persons who may wish to continue working and remaining active in community activities beyond traditional retirement age, but who acquire one or more disabilities (e.g., mobility impairment, hearing impairment) that are more prevalent among older persons.

(5) Training Needs. Training needs to be addressed through the RDBAC are implied in the previous discussions and focus on assuring understanding on the parts of business people, people with disabilities, and others from target groups with regard to: intent of the ADA legislation; entities covered by the ADA legislation; time frames for implementation of various provisions of the legislation; specific requirements of ADA provisions with which employers, businesses, public and private service agencies, governmental bodies and others must comply; options for making job accommodations and building accessibility modifications; and options for resolving disputes that may arise relative to ADA and its provisions.

In addition to these obvious needs identified by NIDRR and others involved in development and implementation of regulations and monitoring compliance with ADA provisions, there are some training needs specific to each target audience that ILRU and its partners have identified. For example, individuals in the business sector require training on disabilities and their influence on peoples' lives and work capabilities. Training of this type will focus on sensitivity to disability issues, including language and behavior that is appropriate in interactions with people who have disabilities. It will also focus on risks associated with generalizations concerning functional capabilities of people with disabilities as well as potential problems associated with making assumptions about the types and costs of accommodations and/or accessibility features required by an individual with a disability.

Conversely, training provided to persons with disabilities will cover not only the provisions of ADA, but will also focus on the real constraints under which many businesses, especially small businesses operate--particularly with respect to costs associated with making worksite accommodations. The primary emphasis in this regard will not be on trying to discourage people with disabilities from pursuing job opportunities in various settings, but rather to increase awareness on the part of disabled individuals regarding the concerns of business people who may be potential employers. Consumer training will focus on development of negotiating skills to be used in working with potential employers and business people to make job accommodations and to improve accessibility.

The purpose of these training programs will be to assist people with disabilities and/or advocates in developing strategies for working cooperatively with employers and members of the business community in making workplace changes without using confrontational techniques. This approach offers not only access to jobs, but also increases the likelihood that people with disabilities will begin employment on a positive note, rather than starting a job that has been obtained through real or implied threats of legal action against an employer. The goal of the final portion of the training will be to instruct people with disabilities and advocacy groups to address community issues using staged strategies, in which the first stages are requests and offers of assistance in making changes, followed by information concerning legal requirements for reasonable accommodation and accessibility, followed by information on additional sources of technical assistance, and continuing toward resolution of the problem, with legal action being the final stage if other negotiating methods fail to produce desired results. Business people will be fully involved as trainers for this portion of the program for the purposes of providing information on factors that influence business decisions and that might need to be addressed during negotiations

and to suggest alternate strategies that might be used in specific types of negotiations.

In addition to training needs focusing on the specifics of ADA, there are training needs associated with preparing people to be effective trainers and resource persons in their respective communities. Although initially a good part of the training will be conducted in Houston and in selected sites in the other four states of the region, ultimately the RDBAC will be most effective through the preparation of informed and capable individuals who can conduct training and serve as resource persons in areas throughout the five-state region. For this reason, a significant portion of the training program will involve helping business people, people with disabilities, and others from all areas of the targeted states to conduct training programs and to serve as local resource people. This component of training will focus on methods for gauging the level of the audience (e.g., how well do they understand ADA and what are their concerns about its implementation), determining if you (the trainer/resource person) can provide information appropriate to the level of the audience, presenting information in an incremental fashion so that understanding will build, using resource materials (e.g., manuals, audiovisuals) effectively to support training, finding out if people obtained the information sought, and effectively referring people to other sources of information to answer questions or obtain additional information. In addition, this "training the trainers" aspect of the program will focus on assuring that people doing training in the five-state region have current information on resources available to them and on ways of obtaining additional information.

Finally, but importantly, this part of the training will prepare trainers and resource people to present themselves accurately with respect to their roles in the RDBAC. In order to protect individuals and organizations from liability, it is important that trainers and resource people understand that their roles are to inform people about provisions of the law and its regulations and to suggest and to discuss options for dealing with problems that may arise, but not to advise individuals or organizations on particular courses of action. In cases where trainers or resource persons are also professionals, such as attorneys or engineers, it is important that they clarify with trainees and people requesting information that expert advice on a specific course of action to be followed might be available on a contractual basis arranged between themselves and the individual or group seeking such services, but that such services are not part of their responsibilities to the RDBAC. Role delineation with respect to responsibilities to the RDBAC versus other professional responsibilities and personal agendas will represent an important aspect of the training program for persons involved in RDBAC activities.

(6) Meeting Defined Needs with Training Methods and Subject Matter. One strength that ILRU brings to the proposed RDBAC is its experience with training in general and with training on disability-related topics in particular. Over the last seven years, ILRU has been the recipient of funding from the Rehabilitation Services Administration to offer training to both executive directors and middle managers of independent living centers. This training has used a participatory format to explore a wide range of issues, including issues of personnel management, reasonable accommodation, and community advocacy on accessibility to facilities and services. It also involves planned follow-up with trainees to assess their use of training information in their jobs and to provide additional resources that enhance management skills in specific areas. This model will be used in providing initial training on specifics of ADA and how to disseminate ADA-related information to others, followed up by ongoing monitoring and resource augmentation. It is a model with which ILRU has extensive experience, and one that lends itself well to the RDBAC activities.

Recognizing that our greatest weakness vis-a-vis the proposed RDBAC is in our relatively limited experience in working with businesses, ILRU has formed partnerships with the Better Business Bureau (BBB) and with The University of Texas at Austin School

of Business. These partnerships will provide ILRU with access to expert assistance in developing training targeted specifically to business professionals and will increase the likelihood that methods and formats used in training for business professionals are appropriate and take into account the special needs of this target audience.

The training subject matter has been defined in large part by the provisions and regulations of the ADA itself and by recognition of the types of activities that need to be carried out effectively in getting appropriate information to the field. Training methods will draw upon ILRU's extensive experience in meeting the needs of individuals and groups in disability-related fields and will involve use of a variety of formats, including lectures, small and large group guided discussions, simulation techniques, case studies, and long-term follow-along. It will also capitalize on the strengths of the BBB in working with business groups in doing a variety of activities, including offering seminars and other learning programs on ADA, providing ADA-related information through their "Tel-tips" phone-in information service, and featuring ADA-related stories in their business magazines and other publications. Additional detail on the content and methods planned for training activities is provided in Section C, Program/Project Design.

(7) Need for Information Exists. That the need for information exists is evidenced by the fact that several federal agencies have budgeted substantial support for information dissemination activities. However, in addition to the evidence offered by this resource commitment at the federal level, there are other indicators that information needs exist. Although no precise data on numbers of ADA-related offerings by legal firms and other professional groups has been compiled, it would be safe to say that there are dozens of such offerings around the country every week. However, these offerings are targeted primarily at large employers and other entities with the money to pay what are often substantial fees and according to contacts in the business field, often focus on methods for circumventing the provisions of ADA, rather than on complying with provisions. To a large degree these offerings are not meeting the needs of smaller employers and are usually not targeted at all to groups of persons with disabilities.

As regards evidence of informational needs by persons with disabilities, ILRU has a much clearer picture. Because of our ongoing contact with a wide variety of disability-related service organizations, ILRU staff are aware of the most current informational needs of persons with disabilities and of service organizations in the disability arena. It can be stated unequivocally, that since passage of the ADA in July 1990, the type of information most frequently requested by people contacting ILRU relates to ADA, its provisions, and its meaning to them and to their communities. At minimum, five requests for ADA-related information are handled by ILRU every working day. Many of the questions are about the schedule for availability of implementing regulations, but other questions are about sources of assistance to help organizations come into compliance, methods for determining compliance, and interpretation the language of the law.

In response to the steady stream of requests for ADA-related information, ILRU has begun assembling technical assistance resources and has been identifying groups and individuals who are knowledgeable concerning ADA and its provisions. The proposed RDBAC will provide support to further expand these informational resources and will allow for creation of the structure to address more effectively the information needs that are so clearly evident.

(b) Potential Impact of Outcomes: Dissemination/Utilization

(1) Likelihood that Results Will Become Available to the Field. As with training, one of the strengths that ILRU brings to this project is its extensive and proven experience in bringing information to the field. ILRU pioneered efforts to bring

consumer-developed and consumer-focused information to disability-related service organizations. Since 1978, it has edited and distributed a bi-monthly newsletter to service organizations internationally and has produced and distributed brochures, monographs, and other materials on a wide variety of topics, ranging from board effectiveness in non-profit organizations to carrying out effective community-based advocacy. ILRU is recognized internationally as a resource for information on disability rights and on consumer involvement in disability-related service programs. It has earned a reputation for excellence in its training and technical assistance activities and is one of a handful national disability organizations in the country that adheres to the philosophical commitment to consumer control that is critical in maintaining credibility with consumers at local, state, and regional levels.

ILRU will be partnering with the Better Business Bureau to access its extensive array of business contacts and resources in providing project results to business enterprises in the five-state region in an effective and timely manner. As alluded to earlier, the BBB has extensive methods for communicating with the business community. Among these are the toll-free 800 Tel-tips line currently available to businesses in Texas that will be expanded to the four other states, a monthly business magazine that is distributed to all 35,000 member businesses and to the 31 BBB offices located in the five-state region for distribution to non-member businesses, and excellent relationships with local media representatives who can assure that ADA-related press releases and stories find their way into the broadcast and print media.

In summary, the dissemination resources brought to the RDBAC by the participating organizations are substantial and have been proven effective over years of development and refinement.

(2) Means for Disseminating and Promoting Utilization by Others. In addition to the training programs and technical assistance activities to be carried out with organizations within the five-states comprising Region VI, the primary partners in the proposed RDBAC have extensive contacts nationally and internationally that will be used in disseminating outcomes beyond the five-state area and in promoting use of effective strategies and materials in other parts of the country. ILRU is one of two NIDRR funded national research and training centers (RTC) on Independent Living and has a responsibility through the RTC to disseminate relevant information to the field. As previously mentioned, ILRU produces and distributes a bi-monthly newsletter to nearly 4,000 disability-related service and advocacy organizations throughout the country. It is used regularly as a vehicle for informing disability-related organizations about ILRU's research, training, and technical assistance programs and how to access ILRU products and services. ILRU also produces and distributes at nominal charge brochures and publications focusing on results of research projects and issues identified as important by the field. ILRU participates in two computer networks--one operated out of the University of Oregon and serving a number of rehabilitation professional groups, including independent living, and one operated by the New England Coalition of Independent Living Centers that has a smaller but growing user constituency composed of organizations active in the disability movement--that will be used to disseminate information about RDBAC activities, products, and services. ILRU staff also participate in a variety of presentations to professional and consumer groups each year and use these opportunities to distribute information about research and demonstration results. ILRU has funding from The Robert Wood Johnson Foundation, for its national project on Improving Service Systems for People with Disabilities, that involve carrying out a national media campaign designed to focus attention on key issues relevant to disability policy, including health and supportive services for people with disabilities and the influences of employment and community access on these services. Negotiations are underway to hire an experienced media professional to direct this campaign, and this new initiative will provide another vehicle through which to disseminate results of RDBAC activities.

In addition to the dissemination resources of ILRU, the BBB brings to the RDBAC an array of dissemination resources that include: (1) a toll-free information number that allows users to select specific information from a menu operated remotely from a touch-tone telephone or to request personalized technical assistance from an operator who passes the request to the appropriate person; (2) a monthly business magazine; (3) regularly scheduled business seminars open to representatives of all businesses; (4) instructional videos on specific topics; and (5) access to media representatives in 31 cities in the region. A very important resource that the BBB brings to the RDBAC are extensive data bases on businesses and consumers in all five states. Access to these data bases will allow the targeting of RDBAC outreach efforts to specific audiences. For example, a specialized program may be developed to explain ADA and its provisions to staff people of temporary personnel services. With access to the BBB data base, all personnel services in a specific area could be contacted and recruited to participate in the training program. The BBB data files represent an important complement to the data that ILRU has on disability organizations and service providers and will be an invaluable resource in disseminating project information.

The collective resources of ILRU, the BBB, and the other organizations collaborating in RDBAC activities offer a wide variety of approaches for disseminating the results of project efforts and for promoting use of RDBAC products--both materials and methods--by others.

(3) Packaging Training Methods and Content for Use by Others. Packaging of training methods is another area in which ILRU has pioneered innovations. In 1980, ILRU entered into a collaborative relationship with faculty of the Cornell University School of Industrial and Labor Relations to develop and offer an independent living center management training program using a simulation methodology that had not been previously applied in independent living. After testing and refining the program, it was packaged and used for training in more than 20 locations around the country. That training program has been cited by many in the field as one of the best in which they had ever participated. The success of the training program using simulation methodology led to development by Cornell University faculty and ILRU staff of an advanced management training program using a similar methodology that has subsequently been tested and refined and is now available to the field on demand.

In 1984, ILRU received funding from the Rehabilitation Services Administration to conduct a long-term training program for executive directors of independent living centers. Recognizing the unique needs of the independent living field, ILRU designed and offered a training program that could be tailored to the specialized interests and previous experiences of trainees, that covered management problems unique to the field of independent living, and that could be continued over time with the trainee back on the job periodically receiving information and interest-specific support materials and follow-up via mail and telephone. One of ILRU's strengths in serving the independent living field has been its capabilities to develop and package training materials with content appropriate to target audiences, in formats that members of target audiences find accessible and usable, and that are priced to fit within the limited budgets under which most centers for independent living and many other consumer organizations served by ILRU operate. ILRU's emphasis has been on low-cost printed and audio-taped materials that are affordable to organizations with limited budgets, and that can be used in homes and offices without high cost equipment by people with various types of sensory and functional disabilities. Materials are also made available in computer diskette formats; but it has been ILRU's experience that many individuals with disabilities and a significant number of independent living centers do not have computer equipment, thereby limiting use of this format thus far.

By contrast, the BBB has many member businesses with capabilities to access materials packaged in video and/or computer formats. For these business organizations, training materials will be prepared in formats that can be accessed using technology

available to member organizations, with alternate formats such as print media, being available to smaller businesses that do not have the hardware to access electronic media. One training format that the BBB has expressed particular interest in is instructional videotapes for distribution to its 31 offices throughout the region.

The experiences and knowledge of the BBB in working with the business audience and the complementary experiences and knowledge of ILRU in working with independent living centers and other disability-related service and advocacy organizations assures that the packaging and formats used in training activities targeted to various audiences will be appropriate and that the special interests and needs of those audiences will be addressed though both content and methods used. It should be noted that all materials developed for this project will be made available in braille or audio tape formats for people with visual impairments and will be made available in Spanish translations.

(4) Utilization Approach in Addressing Defined Need. The utilization approach has been developed expressly to address the defined needs of target populations. Specifically information gathered and/or generated through RDBAC activities will be used to address the previously defined needs of the target populations. All target populations will be provided with information on ADA and its provisions in formats that are appropriate to their levels of knowledge and that are suitable for the technology available to access such information. Furthermore, ILRU's collaborations with the BBB and with the business schools at The University of Texas and the University of Houston were developed specifically to assure that the channels used to communicate with businesses targeted through RDBAC activities are ones that are familiar to business people.

(c) Probability of Achieving Project Outcomes: Program/Project Design

(1) Objectives of the Project. The objectives of the RDBAC are:

- To provide ADA-related information to target audiences in the region using a variety of media and focusing specifically on disability awareness; the provisions of ADA; the impact of ADA on public accessibility; ADA's impact on the hiring process; reasonable accommodation; accessibility and accommodation in communications; and empowerment of individuals with disabilities to participate in successful implementation of ADA.
- To provide and distribute information about the RDBAC and its activities in facilitating implementation of ADA, including its implications for disability, business, and other groups in the five-state region.
- To develop and/or strengthen linkages to business organizations, state and local governments, service organizations, labor organizations, educational institutions, regional and local media, voluntary organizations, and other potential outlets or conduits for the dissemination of information in the region.
- To develop and implement a plan for marketing RDBAC services to target audiences, building upon the existing marketing capabilities of ILRU, the BBB, and other organizations collaborating in the RDBAC.
- To conduct an assessment of the informational needs of preferred information conduits of employers and commercial establishments, and of the disability, public agency, labor, and service provider communities in the region.
- To develop and offer training programs to organizations representing employers, people with disabilities, representatives of state and local governments, service providers, commercial establishments, labor organizations, voluntary associations, education professionals, and others and focusing on general issues of disability;

provisions of the ADA; accessibility; hiring; early intervention in disability at the workplace; reasonable accommodation; communications accessibility; and empowerment of individuals with disabilities in effectively participating in implementing the provisions of ADA.

- To develop information resources, databanks, reference guides, and pools of experts throughout the region that can be used effectively in providing technical assistance to target audiences.
- To provide immediate referrals whenever possible to individuals from any of the target populations seeking specialized information or technical assistance not readily available through the first point of contact.
- To provide directly and/or arrange for technical assistance on the range of options available to employers on issues of hiring, early intervention in disability at the workplace, and reasonable accommodation on the job.
- To provide directly and/or arrange for technical assistance on the range of options available to businesses in meeting requirements for accessibility and public accommodation for people with disabilities.
- To establish linkages with NIDRR-funded materials development projects, other RDBACs, the coordinating entity for federally funded ADA activities, and other organizations to secure and apply materials developed on ADA implementation and to assess their effectiveness when used in conjunction with materials prepared or adapted for use by the RDBAC.

(2) Soundness of Hypothesis to Be Tested. Although this is not a research project, the preparers of this application have formulated a hypothesis that will be tested through the activities described in ensuing sections. Simply stated, the hypothesis to be tested is: Through collaborative efforts, individuals with disabilities, consumer groups, members of the business community, representatives of government, educators, and others from the public and private sectors can effectively disseminate information about the Americans with Disabilities Act (ADA) and its provisions so that people with disabilities benefit in terms of enhanced opportunities to participate in and improved access to all aspects of community living. The activities described in subsequent sections of this proposal are designed to test this hypothesis.

(3) Appropriateness of Project Design/Methodology in Meeting Objectives. The project design to be employed in meeting the stated objectives is based upon a few assumptions as follow:

- Quality control is a critical factor in the success of RDBAC efforts. It is imperative that the information being provided by individuals associated with RDBAC activities be as accurate as possible. Inaccurate or incorrect information provided to people with disabilities, business people, or others seeking assistance from the RDBAC, could cause significant damage to efforts to implement ADA effectively.
- Managed decentralization of RDBAC functions is the best way to assure that high quality assistance relating to implementation of ADA is readily available to individuals and groups in all areas of the region. With adequate quality control mechanisms in place, the development of resource pools throughout the region offers the best likelihood that people in various parts of the five states can access ADA-related assistance in a timely manner and can obtain information that is relevant in terms of state and local factors, including availability of transportation services, personal assistance services, employment opportunities, etc., of which staff in a centralized office may be unaware.

- Coordination of decentralized activities conducted throughout the region can be effectively managed through the program office. Notwithstanding the need for decentralization, the coordination of activities can be carried out effectively through a central program office that is (a) directed by someone who is knowledgeable about ADA and resources available in the region to facilitate its implementation and (b) staffed by a qualified full-time professional with adequate support from other professional and non-professional staff.

- Monitoring of the quality of RDBAC efforts and assessment of their effectiveness in addressing ADA implementation needs is required to assure quality. In order to be assured that quality standards are being maintained in all five states targeted for RDBAC activities, ongoing monitoring will need to be carried out and regular assessments of both the quantity and caliber of efforts in each state will need to be made. These functions are built into the project design and are meant to "close the loop" in terms of quality assurance, with the quality of initial efforts depending upon sound preparation of resource persons, followed by easy access to these individuals at state and local levels, supported through coordination provided by a central program office, and monitored using accepted project evaluation techniques carried out by an experienced staff.

Based upon these four assumptions, the design for this project has been constructed around an overlapping 10-step process as follows:

1. Assemble and prepare the management team that will have primary responsibility for development of the quality assurance plan, coordination of decentralized activities, and monitoring of RDBAC activities.
2. Secure available ADA informational and training materials and assess them in terms of appropriateness for specific audiences, currency with respect to release of regulations and other information, ease of use, costs, and information available from previous users.
3. Assure the appropriate involvement of collaborating organizations in carrying out RDBAC activities according to mutually agreed upon assignment of responsibilities and specific timelines.
4. Conduct a needs assessment of businesses, public agencies, and disability groups in the five-state area for the purposes of clarifying informational needs relative to ADA and preferred conduits for receiving such information, and analyze results of this assessment in light of results from a similar assessment of needs of independent living center staff being conducted by ILRU through an NIDRR-funded field-initiated research project.
5. Develop a centralized resource pool to serve the program office and initiate activities to begin building resource pools to serve locales targeted for the first stage of decentralization.
6. Conduct initial training of individuals from the five-state area who will serve as trainers and technical assistants in their local areas and provide them with resource materials required to begin activities within areas adjacent to their home communities.
7. Assess the effectiveness of the first group of trainers/technical assistants in terms of numbers of individuals and organizations participating in RDBAC activities in local areas and the perceived quality of the information received and make modifications in the training methods and materials as required to address weaknesses.
8. Continue decentralization of training and technical assistance functions through preparation of other people with disabilities, members of business communities,

government employees, and others who have been identified through local contacts as being interested and capable to serve in trainer/technical assistance roles and maintain efforts to evaluate the quality and quantity of activities carried out by these local resource people.

9. Evaluate summatively the effectiveness of RDBAC efforts in facilitating implementation of ADA in the five-state region and prepare a comprehensive report on the scope of efforts carried out in the region and results obtained through application of quantitative and qualitative measures of those activities.

10. Maintain beyond the five-year funding period, with support provided by cooperating institutions and business partners, the RDBAC as an ongoing regional resource on disability issues that can be accessed by anyone concerned about the rights of persons with disabilities and options available from a wide range of community resources to secure and protect those rights.

The manner in which this 10-step process is to be carried out over the five-year period of federal funding is described briefly below. It should be noted that the stepped process indicated above is used primarily to differentiate between different functional groups of activities that have specific foci. In fact, many of the activities carried out under different steps will overlap in terms of both time and purpose. It is not the intent in using this approach to suggest that these are all discrete functions that can be neatly separated and categorized, but rather to demonstrate that the proposal preparers have carefully considered major functional issues that need to be addressed and have developed a process for addressing these issues in an integrated and timely fashion.

Step 1: Assemble and prepare the management team. Activities under this step have already begun. The management team that will be involved with this project was, with one exception, responsible for conceptualizing the plan to be used in establishing and operating the RDBAC and for identifying key players who will serve as collaborators and consultants during initial phases of the project. The exception relates to the project coordinator, Wendy Wilkinson, J.D., who has been hired and will be joining the ILRU staff in the near future. As she is currently transitioning out of her position as advocacy director at the Houston Center for Independent Living, she has been kept informed about the development of the RDBAC proposal and is enthusiastic about the idea of applying her knowledge of law and experience in disability-related activities to a project designed to facilitate implementation of ADA.

This step may appear to some to be obvious and unnecessary in terms of a presentation of functional responsibilities. While it is obvious that the management team will need to be assembled early in the project, the proposal developers are convinced that, because of the complexity of the project and the territory to be covered by project activities, development of and adherence to a sound management plan is absolutely essential if RDBAC efforts are to be successful. Consequently, it has not been taken for granted that good management will occur automatically, and as much attention will be devoted to project management and coordination as is devoted to other critical aspects of the project, such as training and technical assistance.

In terms of actual activities to be carried out under this step, the following sequence of events is expected to occur.

- The day following notification of a grant award from NIDRR the first management planning meeting will be held to review the plans and requirements for the RDBAC and to assign responsibilities and set specific deadlines for task completion.

- Options for the first meeting of selected collaborating partners will be identified and staff will be assigned to contact specific individuals to determine the

best option for a meeting to be held within two weeks.

- The project coordinator will be charged with preparing, in collaboration with the project director and other staff, a preliminary schedule for major activities (e.g., resource requests, training programs, initiation of components of the technical assistance program), that can be reviewed with primary collaborators at the first full RDBAC meeting.

- Following the first full RDBAC meeting involving collaborating partners, the schedule of major activities will be finalized, responsible parties for each activity will be identified, and the schedule will be distributed to collaborating partners requesting that it be reviewed and a copy returned to the program coordinator within one week indicating any potential problems and identifying personnel at the collaborating organization who will be responsible for each major activity identified.

- A quality assurance plan, for distribution by the middle of the second project month, will be prepared by the project coordinator working with the project director, other project staff, and representatives of collaborating organizations, indicating the types of project information to be gathered from each organization, the persons responsible for providing information, and the timelines for reporting.

- The project coordinator will subsequently be responsible for preparing, by Friday of each week, a detailed task schedule for the following week's activities and for meeting with the project director to review the schedule before distribution to staff and, via FAX, consultants from collaborating organizations.

- Meetings of the full ILRU project staff (and selected consultants when appropriate) will be held once each month at minimum to review project progress and upcoming activities and to discuss problems requiring resolution.

- Meetings between the project coordinator and staff of the prime collaborating organization, the Better Business Bureau, will be held every other month (with sites for the meetings alternating between Houston and Austin so that the project coordinator becomes familiar with staff and operations of the BBB and vice versa) to review progress and upcoming activities and to discuss problems requiring resolution.

- Meetings of representatives of all collaborating organizations will be held at least twice yearly, with additional meetings to be held among project staff and selected organizational representatives as needed to address specific issues.

Step 2: Secure available ADA informational and training materials. As with Step 1, activities under this step have been underway for some time. As alluded to earlier, ILRU has an NIDRR-funded field initiated research (FIR) grant to assess the capabilities of independent living center staffs to deliver ADA-related services. In conjunction with the FIR project and as part of ILRU's ongoing interest in ADA and other disability-related legislation, staff have been gathering ADA-related materials for some time. The process of reviewing these materials and categorizing them in terms of intended use (e.g., general information, technical assistance resource, training support materials), appropriateness for specific audiences (e.g., professionals in law or other disciplines, business people, people with lower educational levels), and cost and accessibility in terms of ownership and copyright has been underway for some time.

This process will be continued over the duration of the RDBAC project, and additional materials will be procured as they become available, with particular emphasis on materials that have been evaluated for use in various settings and are available at reasonable cost for distribution to RDBAC satellite locations to be established throughout the five-state region. Of special interest will be all of the publications and other resource materials developed by the ADA-focused materials

development projects, other RDBACs, and the two national peer training projects.

These ongoing procurement activities will be the primary responsibility of the project coordinator, but virtually all project staff will be engaged in identifying sources of new materials and in assisting with evaluation of materials procured. Prime project consultants at the BBB will also be involved in materials procurement activities, with particular emphasis on identifying and evaluating ADA-related materials for the business sector. Other consultants will be used to identify and review materials in selected areas such as law, engineering, and education. Because the process will be ongoing, the tasks for this component of the RDBAC are redundant, but will be initiated as follows with times for completion in parentheses at the end of the statement:

- Assemble and catalog all ADA-related materials currently available and already reviewed by ILRU staff, assign responsibilities for reviewing materials already in hand but not yet evaluated, and identify potential sources of new materials that should be contacted for input (start of month 3).

- Request information on additional materials from sources identified and compile a summary of these materials, indicating the type of material (e.g., informational brochure, curriculum outline, instructional videotape), target audience (if identified), cost, and availability (e.g., currently available, in development, restricted to certain audiences as in the case of some software) (end of month 4).

- Procure additional ADA-related materials that are available at no cost or minimal cost and materials available on a trial basis and review and categorize them for future reference (end of month 6).

- Convene a meeting of staff and selected consultants to review results of needs assessment of affected entities in the region (see Step 4 below) and to prioritize needs for additional materials in light of survey results, materials available to address needs, and funds available to purchase additional materials (start of month 7).

- Effect purchase of high priority materials needed to address identified ADA-related informational needs of the region and review and categorize materials received to assure quality and appropriateness before final payment on purchase orders (end of month 8).

- Evaluate the quality and utility of materials used in general information, training, and technical assistance activities, summarize the strengths and weaknesses of materials in meeting specific needs, and identify gaps in the availability of materials to address specific functional needs of the RDBAC program (ongoing over the project duration).

- Monitor the availability of new ADA-related materials over the duration of the five-year funding cycle and, whenever possible, secure copies for review and consideration for use in RDBAC activities (ongoing over duration of project).

- Prepare annual summaries characterizing the use of materials to support activities related to ADA implementation and identifying implementation activities for which support materials continue to be lacking or are inadequate (months 13, 25, 37, 49, 61).

Step 3: Assure the appropriate involvement of collaborating organizations.

- Notify collaborating organizations as soon as notice of an award is received and obtain options for the first full RDBAC meeting to be held in the latter half of the first month (month 1).

- Summarize the key activities to be carried out by the program office and collaborating organizations, preliminary timelines, information required from each collaborator, and unresolved issues to be covered in the first meeting and distribute to key personnel within each organization along with an tentative agenda for the first two-day RDBAC meeting to be held in Houston during the latter half of the first month (beginning of month 1).
- Confirm who from each collaborating organization will be attending the first RDBAC meeting and be sure that they have summary materials as indicated, plus a summary of ADA and its provisions and information on meeting logistics prior to the first RDBAC meeting (middle of month 1).
- Convene via teleconference the first full RDBAC meeting, review responsibilities for carrying out each aspect of the RDBAC program, clarify assignments of responsibilities among ILRU staff and collaborating organizations, and confirm timelines for completion of specific tasks over the first year of project activity (end of month 1).
- Initiate regular telephone contact with assigned staff at the prime collaborating organization, the BBB in Austin, and with other collaborators according to a pre-determined schedule to confirm that work is proceeding on schedule and that no significant problems have been encountered (weekly with the prime collaborator at BBB and on a pre-determined frequency schedule for other collaborators).
- Hold face-to-face meetings with the key staff at the BBB and other collaborating agencies according to pre-determined schedules (bi-monthly for the BBB, at least once in the last half of the project for each participating independent living center, and according to pre-determined times for other collaborators).
- Review the work completed by each collaborating agency on a quarterly basis and contact key personnel about any problems with quality or timeliness of work completed, with decisions on continued collaboration based on mutual satisfaction with work done and pending arrangements (4, 7, 10, 13, and quarterly thereafter).
- Prepare an annual report on the nature and outcomes of collaborative relationships and package it with copies of any products produced by collaborating partners for submission to the funding agency (13, 25, 37, 49, 61).

Step 4: Conduct assessments of need for ADA-related information. As indicated in the earlier, work toward completing one component of this needs assessment is already underway through the activities of a field-initiated research (FIR) project that ILRU is doing under a grant from NIDRR. Work in progress will identify needs for ADA-related information as documented by staff people working in independent living centers. The methods to be used in the FIR project involve not only queries directed to staff of independent living centers concerning their perceptions of ADA and its provisions, but also administration of instruments to measure knowledge levels of specific provisions of the Act. These will be administered via mail, with the results providing partial measure of the knowledge levels of people with disabilities who work in independent living centers. In order to gain a more accurate picture of information needs of people with disabilities in the five-state region, the instrument used with staff of independent living centers will be administered to a sample of people with disabilities in the five-state region who are not employed in independent living centers. These individuals will be identified through contacts with: (1) statewide consumer organizations, (2) rehabilitation facilities in the region, and (3) organizations in the region that provide services to people with disabilities, including but not limited to sign language interpreter services, reader services, and mental health counseling services. Results from administration of the instrument to this larger sampling of people with disabilities--in addition to staff of independent

living centers--will provide a fairly accurate measure of the information needs of people with disabilities in the five-state region.

In addition to expanding the administration of the instrument being readied for the FIR project to gauge more accurately the information needs of persons with disabilities, informational need assessments of other target populations will be completed. As regards the business community, needs assessment will be carried out under the auspices of the Better Business Bureau, with the likelihood that better responses will be obtained with their involvement than would be occur without such involvement. ILRU and the University of Texas Center for Legal and Regulatory Studies will assist the BBB in developing the instrument to be used in this needs assessment. Instrument development will not be completed until the end of month two of the project, but the types of questions to be asked of employers will include:

Are you aware of the Americans with Disabilities Act (ADA)?

Do you believe that the ADA applies to your business?

Have you received any information from law firms or other organizations about the ADA?

Have you attended any training about the ADA and what it means to you as an employer?

Have you ever had someone with a disability (handicap) apply to work in your company?

Have you ever hired anyone with a disability (handicap)?

Did you ever make changes in your facility, in the job, or in other people's jobs so that you could hire someone with a disability?

Do you believe that it has or will cost you more to hire a person with a disability?

Do you have any job openings now that you believe could be filled by a person with a disability?

If yes, please list them _____.

If you wanted more information about employing people with disabilities, whom would you contact? (A checklist with some open-ended options will be provided.)

Would you like more information about ADA and its meaning to you as an employer?

In developing the survey for employers, the Better Business Bureau and The University of Texas Center for Legal and Regulatory Studies will be relied upon heavily for guidance on length and language to be used in survey items, best approaches (i.e., mail versus telephone) for obtaining information, procedures for follow-up, and analyses of data. Both of these organizations engage regularly in data collection from employers and the larger business community and can provide expert assistance in assuring that the best possible return rate is obtained from businesses located throughout the region. It should be noted here that the BBB has more than 35,000 member businesses in the five-state region and maintains a data bank on all businesses in the region, including non-members, that can be accessed according to a variety of variables, including business type, size, and location. This data base will be used extensively in needs assessment activities carried out with employers and with commercial establishments in general.

In addition to carrying out informational need assessments with employers, informational needs of commercial establishments in general will be assessed, as will those of public and private service agencies and labor organizations. Some of these organizations will be surveyed using an approach similar to that used with business employers, with modifications in the survey formats and methods as suggested by consultants from the UT Center for Legal and Regulatory Studies and from the Center for Health Policy and Law at the University of Houston.

In addition to assessing needs relative to employment of persons with disabilities,

a sample of employers, commercial establishments, public and private service agencies, government agencies, and other organizations will be surveyed regarding awareness of ADA and its implications for accessibility by people with disabilities to their products and services. With minor modifications to accommodate particular types of organizations, these assessments will seek answers to questions like:

Are you aware of people with disabilities doing business with you?
 Has anyone with a disability ever asked you to make changes in your facilities or services so that they could do business with you?
 Have you ever made changes in your facilities or services so that a person with a disability could do business with you?
 Are you familiar with the Americans with Disabilities Act (ADA)?
 Do you believe ADA affects you in the operation of your business?
 Do you plan to make any changes in your facilities or services so that people with disabilities find it easier to do business with you?
 If you wanted more information about doing business with people with disabilities, whom would you contact?

As in the case of assessment activities with employers, project staff will rely heavily on guidance from the BBB and from faculty at The University of Texas and the University of Houston in developing survey instruments for particular audiences and in identifying the best methods for assuring a satisfactory rate of return on surveys and other information-gathering activities. These organizations have extensive experience in this type of activity and can be relied upon to assist with completing needs assessments in the most expeditious and effective manner.

Once data on needs have been collected from all target populations, analyses will be carried out by ILRU evaluation specialist, Dr. Margaret Nosek working in concert with analysts at the BBB and consultants from The University of Texas and the University of Houston. Information needs of specific target audiences will be identified based on these analyses, as will areas of ADA-related information for which available data may be inconclusive and suggestive further assessment.

This set of information needs will be used in establishing priorities for procurement of additional information for training and technical assistance and will provide guidance to staff in strengthening aspects of training for business people, people with disabilities, and others to be targeted for RDBAC activities. After year one of the project, follow-up assessments will be carried out with target populations using samples drawn from data bases maintained by ILRU, the BBB, The University of Texas Center for Legal and Regulatory Studies, and the University of Houston Center for Health Policy and Law.

Needs assessment activities to be carried out initially are:

- Examine instruments developed by ILRU staff for use in assessing the capabilities of independent living center staff to deliver ADA-related services and determine how they might be modified, if necessary, for use in assessing the ADA-related information needs of people with disabilities living in the five-state region (month 1).
- Meet with BBB staff and consultants from The University of Texas and the University of Houston to determine the best approaches for assessing ADA-related information needs of targeted audiences other than people with disabilities and assign responsibilities for preparing by the middle of month two the first draft of assessment instruments to be used with employers (end of month 1).
- Review the first draft of the assessment instrument to be used with employers, make recommendations to prepare it for pilot testing, and determine how it might be modified for use in collecting information on accessibility from commercial

establishments, service agencies, government agencies, and other covered entities (middle of month 2).

- Prepare the final draft of the assessment instrument for employers for pilot testing with at least 20 employers selected with input from the BBB (end of month 2).

- Prepare first draft(s) of other instruments for use in assessing accessibility information needs of commercial establishments, public and private agencies, and other organizations (beginning of month 3).

- Conduct pilot test of instrument for use with employers to determine clarity, completeness, utility of the information generated, and time for administration and finalize instrument for use with a larger sample of employers drawn from the five-state region to be determined according to available estimates of the total employer population and the sample size needed to attain satisfactory levels of confidence (middle of month 3).

- Pilot test final drafts of instrument(s) to be used in assessing accessibility information needs of commercial establishments, public and private agencies, and other organizations using limited samples of appropriate organizations in the five-state area selected with input from the BBB and university partners (middle of month 3).

NOTE: Decisions on whether businesses selected to participate in the employer survey should also be considered for sampling in the accessibility survey will be made in consultation with BBB staff and university consultants based on several factors, including redundancies in the information requested, length of assessment instruments, and knowledge concerning receptivity of the audiences being sampled based upon previous experience in conducting similar assessments.

- Finalize instruments to be used in assessments of information needs on accessibility based on results of pilot testing and prepare for administration to appropriately sized samples based upon estimates of the total populations of targeted organizations in the five-state area (end of month 3).

- Complete administration of instruments to assess ADA-related information needs of employers and analyze data on needs, current sources of information, and preferred information sources (middle month 4).

- Complete administration of instruments to assess ADA-related information needs of commercial establishments, public and private agencies, and other organizations relative to accessibility and analyze data on needs, current sources information, and preferred information sources (end of month 4).

- Prepare a full report on all needs assessment activities, describing how assessments were done, results obtained, and implications of the results for RDBAC activities (beginning of month 5).

- Circulate the report on needs assessment outcomes to project staff and selected consultants to determine if follow-up assessment activities or additional analyses are recommended before proceeding with development of training and technical assistance components based upon needs assessments (middle of month 5).

- Prepare an outline of the materials procurement, training, and technical assistance activities to be undertaken as a result of needs assessment activities and circulate to all project staff and key consultants (beginning of month 6).

- Conduct follow-up assessments of information needs of employers and information needs of commercial establishments and other agencies relative to accessibility

according to a schedule determined through consultation between project staff and key consultants (months to be determined, but probably in years three and five of the project).

Step 5: Develop a resource pool to support RDBAC activities.

- Modify ILRU's existing technical assistance request form for identifying independent living experts nationally to focus specifically on ADA-related areas of expertise and distribute it to all independent living centers and disability consumer groups in the five-state area to identify individuals with expertise on ADA and its provisions (month 1).
- Work with representatives of the BBB and its 31 member organizations in the five-state area to identify individuals in those cities from the fields of business, law, the media, and other fields with which BBB staff members have regular contact (months 2 and 3).
- Survey consultants from universities, government agencies, and other public and private agencies on their knowledge of individuals who have expertise in ADA and related employment and accessibility issues and follow-up through direct contacts with people recommended to determine their willingness to be identified as part of the expert consultant pool (months 2 and 3).
- Prepare an expanded listing of individuals identified as having expertise in ADA related matters, categorize as to areas of specialty (law, design, personnel management, engineering, media, education, etc.) and circulate to staff and consultants for review and requesting additional recommendations (month 4).
- Contact any additional experts identified by staff and consultants and add information on them to the listing of experts in the resource pool (month 4).
- Continue augmenting the resource pool over the duration of the project, through both contact with people assisting with RDBAC activities and through periodic resurveying of representatives of target populations (month 5 and continued periodically over the duration of the project).

NOTE: As part of its commitment to the RDBAC, the BBB has indicated its willingness to develop and assist in applying a process for applying standards to be used in screening persons who nominate themselves to be in the RDBAC resource pool. BBB has extensive experience in this type of self nomination and screening process and such an endeavor will be undertaken after the project is well underway. Determinations on timing this aspect of resource pool development will be deferred however, until time demands resulting from other RDBAC activities are better defined.

Step 6: Conduct training of individuals within the five-state region. The approach to be used with preparing people to serve as trainers and technical assistants in the five-state area is based on the notion that once a nucleus of individuals who have adequate knowledge and support has been created in a state, that nucleus can be used to expand efforts year by year while still maintaining quality control. The major concern of the project staff and primary collaborators is that quality not be sacrificed in a rush to develop a large number of trainers and technical assistants in a short period of time. Consequently, training activities have been designed to assure high quality in initial preparation of trainers and technical assistants and to allow for managed expansion of the training and technical assistance over the five-year period with the least risk of diminished quality.

The first group of trainees will come from eight sites in the region. These are Dallas, Amarillo, and McAllen in Texas; Tulsa and Norman in Oklahoma; Shreveport, Louisiana; Little Rock, Arkansas; and Santa Fe, New Mexico. Three sites were selected

in Texas because of the size of the state and the variations in demographic characteristics between these areas of the state. Two sites were chosen in Oklahoma where there are a number of independent living centers and active groups of people with disabilities who can be drawn upon for RDBAC activities. Each of the other three states has only one or two independent living centers and, as such, relatively fewer sources to draw upon in developing resource pools and assuring quality control through contacts with known staff of existing service organizations that are controlled by people with disabilities. Over the five-year project period, efforts will be devoted to developing additional resources among disability groups in all five states, but particularly in Arkansas, Louisiana, and New Mexico.

To provide balance in initial and subsequent training activities, the BBB in each of the eight sites will also be asked to identify a BBB staff person or a person from a local business that is interested in committing time to participate in training activities and to serve as a technical assistant and trainer in local activities to be conducted in later years. Both the person with a disability identified by the independent living center and the individual identified by the BBB will receive training to prepare them for their roles as primary resource persons in their respective areas. The activities for accomplishing this are summarized as follow:

- Arrange for ADA-related training to be provided by staff of the Disability Rights and Educational Defense Fund (DREDF), with support from the business consultants, and selected other experts drawn from the Houston area (month 1).
- Identify appropriate staff from an independent living center and from the business community to serve as primary resource persons within the eight initially targeted locales (month 2).
- Provide materials on ADA and its provisions and on the objectives and RDBAC activities to primary resource people in each locale (month 2).
- Make arrangements for travel to Houston by both people (one person with a disability and one business person) from each locale to participate in ADA-related training provided by DREDF and selected consultants (month 3).
- Prepare materials required for training of primary resource people and send pre-training readings and related materials to persons selected (month 4).
- Conduct a two-day training in Houston for each two-member primary resource team from the eight initial sites--see Section (a)(5), Training Needs, for a summary of topics to be covered--to prepare them to serve as technical assistants and trainers in their own locales (month 5).
- Work with members of the primary resource teams to set up two-day ADA training sessions in each of the eight regional sites--to be jointly conducted by the team in each site--with one day targeted to business people and conducted with local BBB support and the other targeted to people with disabilities and conducted with independent living center support and provide support materials to be used in training (months 6 and 7).

NOTE: Promotion of the training to the business community will be handled by the local BBB and promotion of the training to the disability community will be handled by the independent living center and ILRU so that the likelihood of the training being perceived as credible by specific target audiences will be enhanced.

- Provide staff support to each of the eight sites in conducting one two-day training session and evaluate the quality of training provided in each site based upon pre-determined evaluation criteria (months 8-11).

NOTE: It is expected that training will be offered in two sites per month, and the project coordinator and a training consultant identified by ILRU will travel to each site to assist with training and to evaluate the quality of training provided to both the business groups and the disability groups participating at each site.

- Follow-up with primary resource persons at each site to discuss the quality of training provided, value of materials used to support training, and ways in which training might be improved in subsequent offerings (months 8-12).
- Continue working with primary resource persons at each site to develop resources--material and personnel--for use in provision of technical assistance and to provide guidance on developing and marketing technical assistance to other organizations in the community (months 8 through duration).

Step 7: Assess the quality of the training program and modify as necessary.

- Contact a sampling of participants from both the business groups and disability groups participating in training programs at each site and obtain direct feedback on perceived quality of the training program, use of the information since completing the program, information needs not addressed, and additional information that would help in understanding and using and/or complying with ADA effectively (months 9-12).
- Assemble evaluation data on numbers of training participants at each site, participant evaluations, and assessments by the project coordinator and training consultant, and identify strengths and weaknesses of the training program in general (month 12).
- Revise the training curriculum used in the original eight sites in accordance with findings from evaluations of initial trainings and send the revised curriculum to the primary resource persons and selected consultants for review and comment primary to preparing copies for use (months 12 and 13).
- Continue updating and augmenting training support materials over the duration of the project as new regulations are put into effect, court rulings on ADA and its provisions begin to become available, and results of NIDRR-funded and other materials development projects begin to become available to the field (month 12 through project duration).

Step 8: Continue decentralization of the training program in the five states.

A primary intent of the proposed RDBAC is to create local ADA-resource pools throughout the five-state region. To do this, the project will use individuals from business, service agencies, and disability organizations who are identified through local training and technical assistance activities to expand the resource pool and to extend training capabilities to other areas of the five states. This will be accomplished by requiring that each of the primary resource teams who participated in training in Houston and helped to conduct trainings in their respective communities during the first year will offer trainings in at least two other communities in their state during year two. Communities targeted for year-two trainings will be places where the BBB has an office with staff who can assist in marketing the training to the business community and where there is an independent living center or well-established disability consumer group that can assist with marketing the training to the disability community.

As in year one, the project coordinator will travel to each of the training sites to assist with training and to evaluate the training quality. Depending upon the results of evaluations from year one training activities, one or more training consultants may also go to selected training programs to shore up weaknesses that may have been identified with specific training teams. In each case, the project coordinator and others doing training will be looking for at least one business person and one person with a disability from each site (32 individuals total) who have the potential to serve

as trainers and technical assistants in for future training sessions, and these individuals will be invited to attend a two-day training in Houston, similar to the one conducted in the first year, to prepare them for training and technical assistance responsibilities. Each person thus trained will be expected to participate in at least two trainings to be held the following year and will be provided with training materials and other resources to help them function as trainers/technical assistants on ADA.

In years two through five, support will be provided for additional trainings and technical assistance offerings in communities in the five-state region. However, individuals who participated in the initial Houston training group, and who subsequently served as trainers in the 16 second-year training programs and were judged to be effective in their training roles will be recruited to provide training assistance at new training sites in their states. The exact numbers of trainings to be offered in years three through five will be determined by the numbers of competent trainers to be identified and by the availability of additional resources that can be generated from business and from other sources to support training efforts. However, it is expected that a minimum of 20 training programs per year will be offered throughout the five-state region, with at least one offered in Houston or Austin to prepare 30 to 50 individuals to serve as new trainers/technical assistants in their states. Every training session will be evaluated using an assessment protocol that will be continually refined over the duration of the project, with preparation provided to trainers/technical assistants during their participation in preparatory programs in Houston or Austin.

No scheduling of activities is projected for decentralization activities in years two through five, since decisions on timings of trainings will depend on the availability of training personnel and avoidance of other major activities scheduled around those times. However, it can be assumed that one or two trainings will be offered per month in year two to allow for sufficient pre-travel preparation and post-travel evaluation time for the project coordinator. In years three through five, scheduling will be dictated more by the availability of individuals trained as resource persons in years one and two than on the availability of Houston-based project staff. Training schedules for each project year will be tentatively prepared during the last quarter of the preceding project year, with confirmation of each training to be made at least three months in advance to allow time for recruitment of people for the training and preparation and shipping of resource materials.

Step 9: Evaluate summatively the effectiveness of RDBAC efforts. Toward the end of the five-year funding period, a major effort will be undertaken to evaluate in a summative fashion the effectiveness of the training program. In addition to assembling data on numbers of training sessions conducted and numbers of participants in each training session in each state, a more outcome oriented evaluation effort will be mounted. Using data provided by training coordinators at each site, a sample of at least ten percent of business people participating in all trainings will be selected at random, as will a sample of all people with disabilities who participated in training sessions. These individuals will be contacted and asked a series of questions to try to discern to what extent the ADA-training in which they participated had impact on them. Although the exact number and wording of questions to be asked will not be determined until project year five, for employers they are likely to be of the nature of:

Are you less apprehensive about the impact of ADA on you as an employer since completing the training?

Have you made any efforts to hire people with disabilities since completing the training on ADA?

Has anyone with a disability applied for employment at your business since you completed the training?

Have you hired anyone with a disability since completing the training?

Have you made any accommodations in facilities or job duties for one or more employees with disabilities since completing the training?

Did you perceive that accommodations made for a disabled employee were too costly or created a hardship for other employees or management?

Would you hire other employees with disabilities?

Have you made modifications in your facilities or services to accommodate customers with disabilities?

Do you think that enactment of the ADA (check one):

- ☐ helped your business?
- ☐ hurt your business?
- ☐ had no effect on your business?

Questions asked of people with disabilities who participated in ADA training are likely to be of the following type:

Were you employed before participating in ADA training?

Were you looking for work before participating in ADA training?

Did ADA training help you to understand your rights in seeking employment?

Did you use any information obtained from the ADA training in trying to get a job?

Were you successful in getting a job after participating in ADA training?

Do you believe that information obtained from ADA training helped you get a job?

Did your employer make any accommodations to allow you to get your job or to be more productive in your job?

Have you been denied access to facilities or services in public or private businesses or agencies in your community since completing ADA training?

Did you discuss your access problem with the owner or manager of the business or agency with which you had problems?

Did you offer options for how the access problem might be resolved?

Was any effort made by the owner or manager to resolve the access problem?

Did you pursue any other course of action to resolve the problem, and if so, what course was followed and was it successful?

These are examples of the types of questions to be used with business people and people with disabilities who were participants in RDBAC activities in the five-state region. The final list will be designed for ease of administration by either mail or telephone and will be developed with input from survey experts at BBB and at universities from which consultant services have been committed. The final report of the project will include both formative evaluation results on trainings offered and indicators of enhanced capabilities to offer training and technical assistance and summative evaluation results on numbers of individuals who participated in trainings and obtained technical assistance services, and indicators of the effectiveness of such services as determined from results of surveys of samplings of business people and people with disabilities who participated in RDBAC activities.

Step 10: Maintain support for the RDBAC beyond the five-year funding period. This is an important aspect of the project in that it is designed to maintain support for essential RDBAC activities beyond the five-year federal funding period. The extent of support necessary to maintain the RDBAC beyond five years cannot be determined until later in the project period. If decentralization efforts are effective, and local resources are successfully developed in all five states, then the functional requirements of the RDBAC can be scaled back to those of a clearinghouse, providing assistance in maintaining current resources and offering occasional training. These functions will be relatively easy to maintain, and resources can undoubtedly be obtained from TIRR/ILRU, the Better Business Bureau, and local businesses and agencies to support these functions.

However, in addition, the potential for expanding the capabilities of the RDBAC in

developing and offering additional public media programs on disability, employment, and community access will also be explored, as will expanded efforts to conduct research on innovative approaches to dispute resolution and on other topics germane to ADA and its provisions. For this expansion of RDBAC activities in these areas to occur, supplemental funding will need to be secured beyond the five-year project period. Based upon ILRU's previous success in maintaining and expanding programs, it is reasonable to assume that expansion of RDBAC functions in selected areas is quite likely. Beginning early in the funding cycle for the RDBAC, efforts will be undertaken to generate additional funding from the business communities to support expansion of RDBAC activities. In addition funding will be sought from private foundations and other granting agencies in the five-state area and nationally to support aspects of the RDBAC program that are demonstrated to be particularly innovative and/or effective. It is conservatively estimated that at least half of the original funding for the RDBAC can be generated from other sources to support essential services for two to three years beyond the five-year funding period. In actual fact, it is believed that the original funding levels can be matched for a period of at least three years beyond the five-year grant period to allow for expansion of certain RDBAC components, such as new media initiatives, that are identified as important in furthering efforts toward effective ADA implementation.

This summary of activities represents an overview of the methodology to be used in developing, operating, and sustaining the RDBAC beyond the five-year period of NIDRR funding. It is intended to demonstrate to the reader that the activities of the RDBAC have been carefully considered, without suggesting that every facet of a five-year plan can be accurately predicted in an ex ante fashion, or that the proposed schedule of activities does not have the flexibility to accommodate new developments that occur over the five-year time frame. Major activities have been identified and targeted for the first project year, with the schedule of major activities for subsequent years identified on a much more tentative basis. This approach will allow for adjustments in the plan based on new developments and on the results of evaluations and reviews of the previous year's efforts.

(4) Appropriateness of Measurement Methodology and Analysis. Notwithstanding that this is a knowledge dissemination and utilization project numerous measurement activities will be carried out, with accompanying data analyses over the duration of the project. In conjunction with ILRU's field-initiated research project, measures will be made of the knowledge levels of people with disabilities concerning ADA and its provisions. Likewise, with the assistance of the Better Business Bureau's Consumer Education Foundation, measures will be made of awareness levels of ADA and its provisions by members of the business community, representatives of public and private agencies, and others.

ILRU research staff members, under the direction of Margaret Nosek, Ph.D., have extensive experience in conducting research with people who have disabilities, and will follow accepted methods for instrument development and testing, data management, and data analyses. The Consumer Education Foundation of the Better Business Bureau also has extensive experience in measurement of parameters relating to business practices. The BBB routinely surveys member and non-member businesses in communities throughout the five-state region and has an experienced staff which handles instrument development, data collection, and data analyses regularly. For purposes of quality control in measurement and data collection activities, consultant services will be available from The University of Texas Center for Legal and Regulatory Studies and from the Center for Health Policy and Law at the University of Houston.

(5) Soundness of Conceptual Model. The model for the proposed project is based on the concepts of incremental growth and quality control. As the description of the methodology --Section (c) (3)--indicates, activities over the five-year project period will build in quantity and frequency. The rationale for this approach is based on the

principle that the quality of knowledge dissemination and information utilization efforts is the critical factor in determining the success of ADA implementation efforts. As such, the proposed model has been constructed in a manner that allows careful management of all aspects of the project and growth of activities in a manner that minimizes the likelihood of diminished quality in project efforts at all stages.

(6) Appropriateness of Sample Populations. Although this is not a research or development/demonstration project, careful attention will be given to sample populations used in needs assessments training programs, and in subsequent follow-up activities. Care will be taken to assure that individuals with disabilities who participate in activities represent people with various types of disabilities (e.g., mobility impairment, sensory impairment, cognitive impairment), various educational and socioeconomic levels, and various population base categories (e.g., urban, suburban, rural). Because of ILRU's extensive contacts with disability consumer groups throughout the five-state region, it will be possible to recruit individuals with a wide range of characteristics. Obtaining appropriate representation of people with disabilities in samples used for needs assessments and other activities is not expected to pose major difficulties.

By the same token, the BBB has data on virtually all businesses, including its 35,000 member businesses in the five-state area. It can retrieve data from its data bank according to a variety of parameters, ranging from city size, to numbers of employees, to business type. The ability to identify and to access businesses according to specific descriptive parameters is one of the major strengths of the proposed RDBAC, and it helps to assure that proper sampling of the employer/business community can be successfully carried out in needs assessment and other RDBAC activities. As with other aspects of data collection and analyses, expert consultation on sampling will be available from experts at The University of Texas and the University of Houston who have agreed to participate in RDBAC activities.

(7) Protection of Human Subjects. Protection of human subjects will be assured in all aspects of this project. The grantee institution, TIRR, is a clinical affiliate of Baylor College of Medicine, and all research-related activities of the proposed project will be subject to review and approval by the TIRR Research Committee and by the Baylor Institutional Review Board. In every case, steps will be taken to assure anonymity of people providing information used in needs assessment or other activities of the RDBAC, and no data will be reported in a manner that allows for identification of individuals or organizations participating in research or training components of the RDBAC.

(8) Appropriateness of Environment for Model System Development. As a knowledge dissemination and utilization project, most of the model development will occur in standard office environments, with appropriate hardware and software support for needs assessment and training development activities. Actual training activities will occur most often in traditional classroom settings, where information will be presented and discussed and examples offered. No specialized environments are required for development of the proposed RDBAC and its component activities, and developmental efforts will be carried out in a number of locations, including offices of ILRU and the BBB and the facilities of university-based collaborators in this project.

(9) Comprehensiveness and Appropriateness of Training Content. The training content to be covered through this project has been referred to in some detail in Section (a)(5), Training Needs. Most obviously the training content will cover specifics on the Titles I through V of ADA. These are summarized in an attachment to this proposal. Core topics to be covered in all RDBAC training activities include: intent of the legislation; entities covered by the legislation; time frames for implementation of various provisions; specific requirements for compliance with ADA provisions by employers, public and private service agencies, governmental bodies, and

others; and options for resolving disputes that may arise relative to ADA and its provisions.

In addition to this core content on ADA, a substantial portion of the training will be devoted to increasing awareness of both of the primary target audiences--members of the business community and people with disabilities--of the concerns and constraints of the other group. In this regard, business people will be presented with content on the life situations of individuals with disabilities who have options for work, recreation, and other forms of community involvement. People with disabilities will be presented with content on fiscal constraints under which businesses operate; concerns of employers regarding perceptions, whether accurate or inaccurate, of higher costs of health insurance, workers compensation insurance, and making accommodations for people with disabilities; and external influences, such as a recessionary economy, that may influence employers to be less willing to take what may be perceived as risks in hiring people with disabilities.

These awareness-heightening presentations will serve as lead-in training for presentations on options available to the employer and employee in making reasonable accommodation for various types of disabilities and on sources of technical and financial assistance. This portion of the training will then be extended to negotiating skills for the employer and potential employee with a disability who is seeking employment. The focus of this portion will differ somewhat for employers versus people with disabilities who are potential employees. The employer component will cover what can and cannot be asked by an employer in a job interview and methods for evaluating applicant job skills that do not discriminate against people with disabilities. It will also be geared toward working with the new employee with a disability to identify accurately any functional limitations that may require accommodation so that the employee can perform his or her job at maximum efficiency, thereby avoiding problems associated with initial poor job performance that may be difficult for the employee to overcome. Finally, employer training will cover good practices in management of all employees, including those who have disabilities, and methods for dispute resolution that can be used to minimize the likelihood of costly resolution through formal legal proceedings. The area of alternate dispute resolution techniques is one in which both BBB staff and university-based consultants have considerable expertise, and these approaches will be emphasized to both employer and disability training groups.

Trainings targeted to people with disabilities will also focus on developing negotiating skills for dealing both with potential employers and with businesses and community agencies on issues of accessibility. The major thrust of this portion of the training will be on developing the staged approach discussed earlier to addressing perceived discriminatory practices in the workplace and in other settings. The major emphasis of this training will be to encourage people with disabilities to pursue problems relating to discrimination through the least costly and least confrontational pathways initially and to escalate to higher pressure tactics only when negotiations appear to have stalled and to have little likelihood of being reinitiated. This approach has the benefit not only of reducing opportunities for negative backlash from the business community, but also of allowing the conservation of resources, including both money and energy, to tackle the most intractable problems relating to disability-based discrimination.

Training offered in Houston or Austin each year will focus on preparing local area resource persons. This component of the training program will be targeted to individuals identified as having good interpersonal skills and enthusiasm for serving as trainers and resource persons in their local areas. In the first year, 16 people (eight business people and eight people with disabilities) will participate in this training and at least 32 individuals in each year thereafter. During the two-day training program, two-person teams from each site targeted for the year will have

opportunities to observe experienced trainers presenting on ADA, to make presentations themselves, and to practice using different instructional techniques, including small and large group discussions, role playing--with business people and people with disabilities exchanging roles, and case study exercises. In addition, these individuals will be provided basic information on establishing a technical assistance program, including ways of identifying resource personnel, setting up resource files using either electronic or manual systems, maintaining service files, and following up on technical assistance requests.

Following the Houston or Austin training sessions, local resource people will have opportunities to apply their learning by assuming responsibility for organizing and offering ADA-related training programs in their communities. They will be supported in these efforts by project staff at ILRU, and the project coordinator and a training consultant will travel to work with new training teams at least twice before the teams are allowed to conduct training on their own. It should be noted that trainings offered by the training teams in the target communities will be offered in two-day formats, with one day for business people and one day for people with disabilities, with instruction to both groups provided by the team composed of the business person and the person with a disability. This separation of the training program will be done at least initially to increase the likelihood of attracting target audiences--the business component will be promoted by the BBB using its recognition in the business community and the disability component will be promoted by the independent living center or disability consumer groups using its recognition in the disability community. It is also intended to diminish opportunities for confrontational types of exchanges that are likely to occur when groups with what some consider to be opposing agendas get together in settings where control cannot be assured. With the mission of the RDBAC being to foster cooperation between the business and disability communities, confrontational types of exchanges might have a significant negative impact. In later years of the project, as both the business community and the disability community become more familiar and comfortable with ADA and its implications for them, different training formats will be tried and evaluated to determine if they are effective in fostering positive change.

(10) Effectiveness of Training Methods. The training methods have been alluded to in the previous section, and include providing pre-training readings/audiotapes, lectures, small and large group discussions, role playing, and case studies. As mentioned under Section (b) on Dissemination/Utilization, ILRU has pioneered the use of innovative training methods, including use of simulation methodology, in programs developed and refined over the last ten years, and has, for the past six years, offered a series of training programs for managers of independent living centers that draw consistently high praise from participants. It will, throughout this project, explore the best mix of training methods for use in presenting various topics to target audiences and will refine training activities based upon evaluation results from participants and data obtained from the array of evaluation activities to be carried out with this program. It is premature at this point to indicate the precise mix of methods to be employed in training activities, but, with the experience of ILRU and its collaborating partners, it is certain that a variety of training methods will be explored and best approaches for providing training will be identified and disseminated to appropriate audiences.

(11) Quality and Uniqueness of New Materials. It should be pointed out that the focus of this project is not development of new materials. There is a large volume of ADA-related informational and instructional materials already available, and this volume will continue to increase as results from NIDRR-funded materials development projects and other sources become available. Project staff have made a deliberate decision to secure and work with existing or soon-to-be-available materials to the greatest extent possible. A major effort will be devoted to securing, applying, and evaluating training and technical assistance materials available from other sources and

providing feedback to the developers and to the field on the efficacy of such applications and the identified strengths and weaknesses of materials used with particular audiences in addressing specific needs.

One exception to this avoidance of materials development activities relates to plans by the BBB in Austin to develop a set of ten three-minute audio tapes on the ten questions most often asked by business people regarding ADA. These will be developed for access through BBB's toll-free 800 Tele Tips line. This materials development activity is intended to provide business people with ready access to commonly requested ADA information and for use in recruiting business people into RDBAC activities. The tape series will be evaluated through follow-up inquiries with users and through external evaluations by consultants on accuracy, clarity, and utility of the information. Also, new materials, mostly of a case study nature using hypothetical scenarios, may be developed and evaluated, but materials development is not a major thrust of this project.

(12) Linking Target Populations to the Project. In addition to direct contact with people in the business field and disability field by BBB and ILRU staff people, respectively, the two primary collaborators have a number of mechanisms for linking with target audiences. ILRU distributes a bi-monthly newsletter, ILRU Insights, to disability organizations throughout the region and uses the newsletter very successfully to enlist cooperation in research, training, and technical assistance projects. ILRU also distributes periodic direct mailings to hundreds of disability service and advocacy organizations and participates in the SERIES national computer network serving rehabilitation and independent living service providers with a variety of features, including bulletin boards, electronic mail, and event calendars. ILRU offers a comprehensive technical assistance program focusing on consumer-controlled service and advocacy resources and distributes more than 13,000 informational items per year to disability organizations. It also provides direct training to independent living personnel each year, and uses training opportunities to enlist participation in other activities. As mentioned earlier, ILRU also has a grant from The Robert Wood Johnson Foundation that includes funding for a national media campaign that is just getting underway. The resources available through this media campaign will provide a valuable resource in effectively linking with target populations of people with disabilities throughout the region.

The BBB likewise has extensive methods for linking with businesses throughout the region. It communicates with its offices and members regularly through direct mailings, telephone technical assistance, and sponsorship of training programs. It also markets its services to more than 700,000 other businesses in the region and operates a toll-free number that business people in Texas can call to get information about a variety of topics. As part of this project, the toll free number will be expanded to the other four states, and a special feature on ADA and RDBAC will be added to the touch-tone accessible menu. This represents an important component in expanding linkages with businesses in the region.

The letters of collaboration attached to this proposal attest to the willingness of individuals and organizations not simply to be supportive of the RDBAC, but to be active participants in RDBAC programs and activities. A strength of the RDBAC is its existing linkages and potential for substantial expansion of these linkages.

(13) Appropriateness of Dissemination Format in Achieving Results. Both ILRU and the BBB have strong backgrounds in creating and distributing information in formats that are appropriate to the audiences and effective in conveying the message. As previously mentioned, ILRU's primary dissemination methods have focused on low-technology print media and audio cassettes that can be accessed easily by people--like many consumers with disabilities and staff of small community-based service agencies--who do not have expensive hardware such as videotape players and computers. However,

ILRU also has the capability to produce material on computer diskette and on videotape, using production capabilities of TIRR and Baylor College of Medicine, an academic affiliate. Most importantly it is familiar with accessibility requirements of people with disabilities and can have materials prepared in Braille or large print as well as audiotape. Access to training programs is also provided through provision of sign language interpreters and audio looping for hearing impaired persons and by arrangement for provision of personal assistance services for people requiring such in order to attend training. All formats and special assistance needs will be considered in developing the training and technical assistance capabilities of the RDBAC, and choices will be dictated by results of needs assessments, as well as by costs and recommendations by consultants.

BBB's experience with dissemination to business communities throughout the region has, likewise been tailored to community needs. Although using a somewhat higher technology approach than ILRU, BBB has concentrated on cost effective dissemination methods, such as the toll free number, which afford easy access by a large target population at relatively low cost. BBB's access to dissemination methods targeted to the business community through direct mail, telephone dispensed assistance, face-to-face training, audiovisual programs, and extensive contacts with the media help to assure success of RDBAC activities.

(d) Probability of Achieving Proposed Outcomes: Key Personnel

(1) Training and Experience of Project Director and Key Staff. Lex Frieden, M.A., will serve as project director with primary responsibility for planning and coordination of project activities. Frieden is currently staff associate of ILRU as well as senior vice president of TIRR. He is also director of an ILRU national project funded through The Robert Wood Johnson Foundation, entitled "Improving Service Systems for Persons with Disabilities." He was previously executive director of the National Council on the Handicapped (now the National Council on Disability, NCD), and it was under his leadership that NCD drafted the original ADA legislation. Frieden was significantly involved in promoting passage of ADA and is considered an expert on ADA and its provisions.

Wendy Wilkinson, J.D. will serve as project coordinator. Wilkinson is a graduate of the Florida State University College of Law and will be joining the ILRU staff in the near future. In addition to experience as a practicing lawyer, and her personal experience with disability (spinal cord injury), she has worked in the field of independent living and is very knowledgeable concerning issues of disability rights and the legal nuances of ADA and its provisions.

Laurie Gerken will serve as technical assistance specialist. Gerken is ILRU director of technical assistance and is also project director of ILRU's RSA-funded special project to develop and evaluate the feasibility of neighborhood-based independent living services targeted to black and Hispanic persons with disabilities. She was previously director of an RSA-funded project on delivery of independent living services in rural areas. She has personal experience with disability (spinal cord injury).

Laurel Richards will serve as training specialist for the project. Richards is ILRU director of training and is project director of ILRU's RSA-funded long-term management training program for upper-level managers of independent living centers. She is also editor of ILRU Insights and serves as editor of all monographs and special reports produced by ILRU. In addition, Richards has authored numerous monographs, articles, and book chapters on independent living.

Margaret Nosek, Ph.D., will serve as evaluation specialist. Nosek is ILRU director of research and is an assistant professor of physical medicine and rehabilitation at

Baylor College of Medicine. She has had principal responsibility for developing and maintaining ILRU's extensive data base on independent living centers and is very experienced in questionnaire development and administration. Her experience as technical assistance coordinator for the Southern Region 504 Training Project in the early 1980's offers valuable background for the planning, execution, and evaluation of the RDBAC. She was substantively involved in drafting ADA and in guiding its passage through Congress. She has personal experience with disability (spinal muscular atrophy).

Quentin Smith will serve as management resource specialist of the project. Smith is currently co-director of ILRU's long-term management training project. In addition to having served as the executive director of the Houston Center for Independent Living, Smith co-authored with ILRU research director Peg Nosek On the Right Track: Foundations for Operating an Independent Living Program, which provides basic management guidance to individuals and groups in establishing and operating an independent living service delivery organization. Smith is very experienced in synthesizing knowledge of specialized topics for use with different audiences and has authored numerous topical monographs for the field of independent living and on various health and educational topics.

Yilin I. Zhu, M.P.H. will serve as data management specialist. She is currently a research assistant at the ILRU Research and Training Center on Independent Living and has primary responsibility for developing and maintaining the ILRU National Database of Independent Living Programs, and providing support and technical assistance to various ILRU projects in the area of statistical analysis. A member of ILRU since 1986, Zhu is quadriplegic as a result of a spinal cord injury. Zhu has an M.P.H. in biostatistics from the University of Texas School of Public Health in Houston.

(2) Familiarity With the Literature. ILRU staff have been working and writing in the area of disability rights for more than 13 years and are intimately familiar with the literature. This is demonstrated by frequent citations in disability rights literature, in ILRU publications, and the writings of staff published in various sources (see biosketches). Further evidence of this familiarity is a brief review of literature on ADA attached as an appendix to this proposal.

(3) Involvement of Required Disciplines. The proposed project has been designed to assure substantive involvement of people from all disciplines identified as important to the success of the project. Most importantly, it involves people from the disability-service field and disability-rights movement and people from the business sector. The project director, project coordinator, technical assistance specialist, and research specialist are all well known for their contributions to disability service development and the disability rights movement. In addition, they represent the academic disciplines of psychology, law, and rehabilitation counseling. The field of business is represented through staff of the BBB and through resource persons whom they have identified to participate in the project and listed in an attachment to this proposal. Additional disciplines represented by individuals who have agreed to serve in consultant and/or resource pool roles include: physical engineering, rehabilitation engineering, architecture, state government, city government, broadcast media, public policy, economics, accounting, management analysis, and public education.

(4) Commitments of Staff Time to the Project

Lex Frieden	25%	Margaret Nosek, Ph.D.	10%
Project Director		Evaluation Specialist	
Wendy Wilkinson	100%	Laurel Richards	15%
Project Coordinator		Training Specialist	

Laurie Gerken 20%
Technical Assistance Specialist

Quentin Smith 10%
Resource Materials Specialist

Project Secretary 75%

(5) Involvement of Persons Who Have Been Traditionally Underrepresented. Of the seven project staff currently identified, five have severe disabilities, five are women, and one is Asian. Consideration will be given in all project activities, including advisory functions, consultation work, and employment, to selecting qualified representatives of traditionally underrepresented groups such as members of racial and ethnic minority groups, women, disabled persons, and elderly persons. Equal access for members of traditionally underrepresented groups is assured for all project programs and activities, and affirmative action will be taken to recruit members of these groups as project participants and employees.

(e) Probability of Achieving Proposed Outcomes: Evaluation Plan

(1) Mechanism for Evaluating Plans, Progress, and Results. The evaluation plan for this project is multifaceted and is designed to assure that all aspects of project operation come under close scrutiny. Responsibility for overseeing evaluation activities of the project will rest with Margaret Nosek, Ph.D., ILRU director of research, who has extensive experience in both applied research and project evaluation and Laurel Richards, director of training. Nosek and Richards will work with the project director and project coordinator in preparing an evaluation process including the following:

- collection of baseline data on knowledge levels of a sample of people with disabilities regarding ADA, sources of information from which ADA-related information was obtained, and areas of interest regarding ADA and its provisions;
- collection of baseline data from a sample of people from the business community (accessed with assistance from the BBB) on awareness of ADA and its provisions, sources of information about ADA, and preferred conduits for additional information on ADA;
- identification of ADA-related resource materials currently available to disability service providers and members of the business community;
- collection of baseline data on knowledge levels, sources of information, and self-perceived knowledge deficiencies of all persons with disabilities, business people, and others participating in RDBAC training on ADA;
- post-training data on people participating in ILRU training on ADA for use in assessing training effectiveness with baseline data;
- participant evaluation data, indicating perceived clarity, quality, and utility of the information; knowledge level of training faculty; quality of supporting resources and materials; and overall quality of the training;
- follow-up data collection with a sample of at least ten percent of all people (including both business people and people with disabilities) annually who participate in ADA-training programs and technical assistance activities coordinated through the RDBAC to determine if the training or technical assistance was of value, if the information was used by the individual, whether use of the information produced desired results, and other information that might be helpful to the individual;
- collection of data on numbers of people with whom resource people engaged in training (along with dates, locations, and durations of training sessions) and to whom technical assistance was provided (along with topical areas for technical assistance

and topics on which resource people were not prepared to answer);

- follow-up data collection with all trainers and technical assistants who receive preparation through the program to determine if they perceive that their preparation was adequate for the role in which they are serving, what areas they perceive as being most important for additional training on ADA and its provisions, and methods for using ADA-related knowledge effectively; and

- final-year follow-up data collection with at least ten percent of business people and ten percent of people with disabilities who participated in the program to determine what they perceive to be the impact of their participation in the program in terms of increased opportunity in the community for people with disabilities and, for employers/business people, changes in attitude or behaviors toward people with disabilities who are seeking employment, products, or services through the place of business.

(2) Likelihood of Producing Quantifiable Results. As the above summary of evaluation activities indicates, a large amount of quantifiable data will be produced from this project. Data on ADA-related knowledge levels and information needs of individuals with disabilities and business people will be quantifiable and subject to comparison with post-intervention follow-up data. Data on numbers of training sessions held to prepare resource people and numbers of people with specific characteristics (e.g., representing types of disabilities, representing different business organizations) will be collected. Pre- and post-test results from training programs will be gathered. Numbers and types of technical assistance requests handled by project staff at ILRU and at BBB, as well as by individuals prepared to serve as local resource people in the five-state area will be reported. Numbers of trainings provided by people prepared to serve as local resource persons will be reported, attendance figures and demographic data on people participating in trainings carried out in the five-state area.

Finally, and perhaps most importantly, the summative follow-up to be carried out in the final project year will provide a quantitative estimate of the impact that the project has had on people with disabilities and people operating businesses serving communities where RDBAC activities were held. This last quantitative measure is most important because it will indicate if RDBAC efforts have produced positive results with regard to the status of people with disabilities living in the five-state area, and it will provide the best indication of the task remaining before us in terms of making ADA a piece of legislation that truly opens the doors to community participation for people with disabilities living in the targeted five-state area.

(3) Likelihood of Evaluation Results Being Assessed in Service Settings. Because of the involvement of staff of independent living centers, there is a very high likelihood that evaluation results will be assessed in a service setting. It is expected that most of participants with disabilities will be staff of independent living centers, and that technical assistance and training services to be offered by local resource people will be done under the auspices and with the support of the independent living centers. One aspect of the evaluation that has not been mentioned heretofore is the question of how the strengthening of ADA-related service skills of center staff influences the center and its operations. It is expected that an important by-product of this program will be increased numbers of contacts between people with disabilities living in communities targeted for center staff training and increased contacts between center staff and business representatives, service agency personnel, government agency staff, and others in these communities. This is viewed as a positive outcome of the project in that it may open doors for development of fee-for-service programs, greater involvement with business in securing corporate support, and opportunities for improved relationships with community leaders who may assist centers with securing support for programmatic activities targeted to improving the

quality of life for people with disabilities. Follow-up interviews with executive directors and other staff of centers participating in the project will be conducted yearly and at the end of the five-year project period to determine what the impact of the project has been on delivery of services through independent living centers.

(f) Program/Project Management: Plan of Operation

(1) Insuring Proper and Efficient Administration. The proposed RDBAC has been developed to take advantage of an administrative structure that has been used effectively in managing numerous similar projects carried out by ILRU over the past 13 years. The structure draws upon strengths of key staff and selected advisors and consultants in addressing specific responsibilities essential to effective operation of the RDBAC. The administrative structure to be used for the RDBAC calls for general oversight of all aspects of RDBAC operations by an advisory committee composed of representatives of business, universities, independent living centers, rehabilitation organizations, and consumer organizations (see appendix for list).

The advisory committee will be responsible for reviewing all RDBAC plans and for recommending strategies for improving processes and outcome of RDBAC activities. The advisory committee will also review evaluation data and narrative descriptions of project outcomes and make recommendations for improving outcomes of future RDBAC efforts. It will help to identify resource people from a variety of fields and locations willing to serve as members of the resource pool being developed for the project, and who can be called upon as consultants to work on specific problems on an ad hoc basis. The advisory committee as a whole will be convened once each year via teleconference after having been provided with summary information on project plans and the most current evaluation data. The teleconference approach is being used as a means of conserving funds that would be spent on travel if in-person advisory committee meetings were used. ILRU has extensive experience in successfully using the teleconferencing approach with advisory committee meetings.

The advisory committee will communicate directly with the project director, Lex Frieden, who will have overall responsibility for project management, including oversight of project staff and primary contracting and consulting partners, direct supervision of the project coordinator, monitoring of project progress, adherence to sound fiscal management practices, and submission of project reports. Frieden will meet on a weekly basis with the project coordinator to be sure that day-to-day work remains on schedule, monthly with the full RDBAC staff at ILRU, and as needed with contractors or consultants working on specific aspects of RDBAC programs.

A project coordinator, Wendy Wilkinson, J.D., will have primary responsibility for day-to-day work to be carried out through the RDBAC. She will be responsible for overseeing the work of support staff, for working with staff at the BBB on a regular basis, and for dealing with consultants and resource persons on routine activities of the RDBAC. It will be her responsibility to assure that appropriate reviews of ADA-related materials are carried out by qualified individuals, arrange for training programs in Houston and other sites, communicate with consultants and contractors on training and technical assistance activities, provide on-site support for training activities, assist with collection of evaluation data, and draft project reports and other communication for the project director. Wilkinson will be the primary full-time staff person on this project.

Yilin Zhu, M.P.H., will serve as half-time data management specialist on the project, with responsibility for assisting the project coordinator and evaluation specialist with completing the needs assessment, and with establishing and maintaining data files on the full range of project activities. Zhu will be responsible for assisting with instrument development, setting up a management information system, overseeing the mailing of survey instruments, entering survey data and results from

other evaluation activities in computer storage, carrying out data analyses, and assisting with provision of technical assistance on ADA.

The major responsibility of overseeing establishment of ADA technical assistance capabilities will fall to Laurie Gerken, ILRU's director of technical assistance. She will supervise development of instruments for collecting data on personnel and resources for technical assistance, prepare formats for saving and disseminating technical assistance information, oversee support staff involved in operating the technical assistance system, and deal with specific technical assistance issues relating to ADA and its provisions. She will devote 20 percent time and effort to the project.

Oversight of training activities will be provided by Laurel Richards, ILRU's director of training. Richards will be responsible for providing expert guidance director in planning and offering training programs, assisting with preparation of materials to be used in training programs, preparing evaluation instruments to be used with training activities, and participating in parts of the training program. Richards will devote 15 percent time and effort to the project.

Supervision of RDBAC evaluation activities will be the responsibility of Margaret Nosek, Ph.D., ILRU director of research. Nosek will direct development of the overall evaluation protocol to be used, supervise preparation of data collection instruments for needs assessment and other non-training evaluation activities, oversee data analyses and interpretation of findings, and review drafts of project reports for correctness in presentation of evaluation findings and their implications vis-a-vis ADA implementation. She will devote 10 percent time and effort to the project, with five percent provided as in-kind support.

Quentin Smith, M.S., ILRU staff associate, will serve as resource materials specialist for the project, with responsibility for identifying resources for use in RDBAC activities and for assisting with development or adaptation of resources for use in training and technical assistance. Smith currently provides similar services for other projects of ILRU, particularly in the area of management training. He will devote ten percent of his time and effort to the project, with five percent provided as in-kind support.

The proposed management plan assures that people with specific expertise are assigned responsibilities that capitalize on that expertise and that no one individual is assigned greater responsibility than they can manage effectively. ILRU has been using this ensemble approach to project management for more than ten years and has refined it to a very efficient means of operation. This management structure, in tandem with effective use of contractors and consultants as described in section (3), Effectiveness of Proposed Collaborations, below will assure that the RDBAC produces expected results.

(2) Plan for Using Resources and Personnel in Achieving Objectives. The plan for using resources and personnel in achieving objectives is discussed in great detail under Section (c)(3) Project Design and Methodology in Meeting Objectives and in other sections of this proposal, including Section (b), Dissemination/Utilization, and Section (e) Evaluation Plan, and in the interest of brevity, the reader is referred to those sections for details on work to be carried out through the RDBAC. However, it should be emphasized that the plan for using resources and personnel in achieving the objectives of this very ambitious project is feasible only because it draws upon the extensive resources of related ILRU projects, including the field-initiated research project on assessing independent living staff capabilities for delivering ADA-related services and The Robert Wood Johnson Foundation-funded project on Improving Service Systems For People With Disabilities. These and other ILRU projects represent important resources to support the RDBAC, and they will be used judiciously in

developing and operating an effective Regional Center.

(3) Effectiveness of Proposed Collaborations. A number of important collaborative relationships have been proposed for the RDBAC. First and foremost is the collaboration with the Consumer Education Foundation of the Better Business Bureau (BBB), located in Austin. This collaboration is crucial in that it provides access to offices and members located throughout the five-state area and that can be tapped for resources and can serve as targets for training and technical assistance activities. The BBB also has an extensive data base on all other businesses in the area that can be accessed categorically to target businesses of specific sizes and types. This type of access to business organizations is an extremely strong component of the proposed RDBAC.

In addition to their assistance in working with member businesses and in accessing other businesses throughout the region, the BBB will also be providing a number of valuable services to the RDBAC. These include direct participation of Mr. Gary Smith, program director of the Consumer Education Foundation, in training activities, his oversight of development of the BBB's ADA-related technical assistance for businesses, and access to the BBB's toll-free number for providing ADA-related information. In addition to the services offered by the BBB through a contractual arrangement to be executed upon notification of a grant award, BBB will provide substantial services as an in-kind contribution to the project. These include: the time of its president and chief executive officer, Mr. John Etchieson, estimated at more than \$11,000 in value; printing and production services for brochures and mailouts estimated at a value of \$12,000 for the Austin Office alone and at an additional \$26,000 for the combined contributions of the other 31 offices region-wide; and production of ten informational audiotapes on ADA that will be accessed through the toll-free number using a touch-tone activated menu. The BBB's participation in this project substantially increases the likelihood the effective linkages between the disability community and the business community will be established, and lends credibility to the RDBAC's outreach efforts to businesses.

Two other very significant collaborations have been established for the proposed RDBAC. These are with the Center for Legal and Regulatory Studies at the University of Texas Graduate School of Business and the Center for Health Law and Policy at the University of Houston. These two groups will be very important in development of needs assessment instruments and methods, making contacts with business leaders and policy makers in the area, and providing support for training and technical assistance activities. Dr. James Jarrett, with The University of Texas and Dr. Mark Rothstein, of the University of Houston were both enthusiastic supporters of this project and both contributed substantively to conceptualizing the RDBAC structure and process and in enlisting support of key resource personnel from throughout the region. An important aspect of Dr. Jarrett's contribution involved enlisting the participation of Mr. Jorge Anchondo, who will work with RDBAC staff in preparing training and technical assistance materials in Spanish for use by persons from the large Hispanic population in this region of the country. Mr. Anchondo is a faculty member with the Center for Legal and Regulatory Studies with responsibility for outreach to Spanish-speaking populations, and among his experiences in public service, is a year-long assignment with the regional office of the U.S. Civil Rights Commission. The continued support of these consultants will help to assure that qualified assistance is available for various aspects of the project and that resource capabilities continue to grow over the duration of the project.

In addition to these major consultation agreements, numerous other individuals representing a broad range of organizations have agreed to participate in a wide variety of activities, ranging from assisting with training and technical assistance to serving as local resource people to expand the capabilities of the RDBAC in effectively implementing ADA provisions throughout the region. Because of the large number of

individuals who have agreed to participate, letters of collaboration are included with the appendices to this application.

(4) Inclusion of Persons Who Have Been Traditionally Underrepresented. Persons who have been traditionally underrepresented in many areas of work and community participation will be heavily represented in the proposed project. It should be noted that, of seven key staff on the proposed project, five are people with severe disabilities, five are women, and one is Asian. In addition, more than half of the people serving on the advisory board will be people with severe disabilities, and people involved in project activities in all sites within and outside of Houston will be selected with a conscious effort to encourage participation by people from racial and ethnic minority groups, women, people with disabilities, and older individuals. TIRR is an equal opportunity employer with a strong commitment to affirmative action, and it will apply these commitments to the proposed project.

(g) Program/Project Management: Adequacy of Resources

(1) Facilities. Since its establishment in 1977 as a national research utilization program, ILRU has established a reputation as one of the foremost leaders in research, training, and technical assistance in the field of independent living. ILRU is located approximately four miles from the main TIRR campus in full accessible office space.

(2) Equipment and Supplies. At present, ILRU has IBM compatible computers, both dot matrix and laser printers, and software programs to support word processing, desktop publishing, statistical data analyses, computer networking, and financial spreadsheet functions. It has modem capabilities for communication with computerized networks and participation in computer bulletin boards. It also has fax capabilities for rapid turnaround of information. Photocopying and other support services are available at ILRU. ILRU staff also have access to TIRR data processing hardware and software and access to the Texas Medical Center Library, one of the largest collections of health care and disability-related texts and periodicals in the world.

(3) Administrative Support. The administration of TIRR is firm in its support of this proposal as evidenced by the involvement of senior level personnel on a no-cost basis; the in-kind contributions of senior project staff including Frieden, Nosek, and Smith; the substantial commitment of equipment and supporting software; and most importantly, the acceptance of an indirect cost rate substantially below that which was negotiated and could have been charged against this project. Furthermore, the distribution of responsibilities proposed for this project assures that resources will be used effectively to achieve optimal results from project efforts.

(h) Program/Project Management: Budget and Cost Effectiveness

(1) Adequacy of Budget to Support Activities. Reviewers are referred to the budget and budget justification for information on the reasonableness of the budget. It should be emphasized that the proposed budget is extremely tight in light of the ambitious project activities outlined for the RDBAC. However, because of currently funded projects that will complement the activities proposed for the RDBAC and the significant in-kind contributions of TIRR, the BBB, and other collaborating partners, the budget will be adequate to complete the work outlined in this application.

(2) Reasonableness of Costs in Relation to Project Objectives. Costs are extremely reasonable in light of the proposed objectives. As stated in the previous paragraph, this project could not be undertaken without substantial in-kind support from collaborating organizations, and this in-kind support is the key factor in keeping project cost levels at the extremely reasonable levels indicated.

(3) Appropriateness of Budgeted Subcontracts. The budgeted subcontract with the

BBB is extremely appropriate in light of their critical role in accessing the business community and in assisting with developing and offering essential components, including provision of training and technical assistance to the business communities in the five-state region. BBB's willingness to participate as a major partner in this project for comparatively little cost is a strength of the proposed RDBAC.

(i) Additional Selection Criteria

(1) Delivering Technical Assistance and Training to Target Audiences. The capacities of the two major partners--ILRU and the BBB--in delivering technical assistance to the primary target audiences of people with disabilities and people in the business community can be documented in a variety of ways. ILRU is one of the best recognized organizations in the country with respect to issues of disability and independent living. It includes technical assistance as one of three major divisions, along with research and training, and provides thousands of technical assistance services to disability service and advocacy groups and to consumer organizations every year. In addition to an average of 25 technical assistance requests handled per day, ILRU distributed more than 13,000 pieces of printed material upon request each year for the past four years. ILRU's ability to deliver technical assistance services is well established and will be further strengthened through the activities of the proposed RDBAC.

BBB, likewise, is well established as a provider of technical assistance services to both the consumer and business communities. With its toll-free number, it responded to nearly 31,000 calls for technical assistance in 1990 and sent out more than 3,600 brochures. It reviews advertising and selling practices of businesses and advises them on adherence to ethical, truthful, and accurate advertising and selling practices that are in the best interests of both the business and the general public. The BBB is well established as a source of high quality information and brings an important perspective to the proposed RDBAC.

Other collaborating institutions, such as The University of Texas Center for Legal and Regulatory Studies in the Graduate School of Business and the Center for Health Law and Policy at the University of Houston, also contribute to the RDBAC's abilities to deliver technical assistance services to selected audiences, particularly the organizations involved in public policy decisions and governmental bodies. These additional linkages, and the involvement of consultants from a variety of other fields assure that technical assistance linkages can be established and maintained with all targeted groups. The training capability of ILRU and its collaborators has been discussed in detail earlier. Reviewers are referred to Section (a) (6) and Section (b).

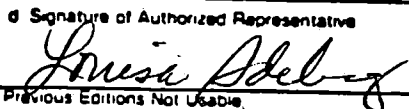
(2) Reaching the Range of Covered Entities in a Timely Manner. The collaborations discussed above, when taken in concert with ILRU's existing close connections to the disability communities throughout the region, and the fact that at the start of the grant period all staff will be in place, assure that covered entities within the region can be reached virtually immediately. Upon receipt of a notification of award, covered entities within the five-state region will be notified of the RDBAC and its purposes and will be informed about how to access services by phone or mail and will be provided with an overview of activities to be carried out by the RDBAC in the first year. Thereafter, contact with covered entities will be maintained at least monthly through special mail-outs and telephone contacts and linkages through collaborating consultants. Reaching covered entities in a timely manner poses absolutely no problems for the partners in the proposed RDBAC.

(3) Collaborations: People with Disabilities and Covered Entities. ILRU has a long history of collaborations with organizations serving and representing people with disabilities in the five-state region. As the attached letters of cooperation and

collaboration suggest, ILRU's relationships with disability-related organizations are very strong and positive and insure the active involvement of many people with disabilities who have knowledge of the ADA and its provisions--in addition to the project director, Lex Frieden, who directed the drafting of the ADA legislation while executive director of the National Council on Disability in Washington, D.C. Collaborations with a wide range of professionals from the fields of law, public policy, education, research, transportation, engineering, architecture, and others also assure that individuals knowledgeable about ADA and its provisions and representing groups and associations of covered entities will be readily available to assist with RDBAC activities. Evidence of these collaborative relationships is provided in the letters of cooperation and collaboration attached to this proposal.

APPLICATION FOR FEDERAL ASSISTANCE

OMB Approval No. 0348-004

1. TYPE OF SUBMISSION: Application ☐ Construction ☐ Preapplication ☒ Non-Construction ☐ Non-Construction		2. DATE SUBMITTED August 5, 1991		Applicant Identifier N/A	
		3. DATE RECEIVED BY STATE		State Application Identifier	
		4. DATE RECEIVED BY FEDERAL AGENCY		Federal Identifier	
5. APPLICANT INFORMATION					
Legal Name: The Institute for Rehabilitation and Research			Organizational Unit: Independent Living Research Utilization		
Address (give city, county, state, and zip code): PO Box 20095 Houston, Harris County Texas 77225			Name and telephone number of the person to be contacted on matters involving this application (give area code): Lex Frieden (713) 797-5283		
6. EMPLOYER IDENTIFICATION NUMBER (EIN): 7 4 1 3 3 4 6 7 8			7. TYPE OF APPLICANT: (enter appropriate letter in box) N		
8. TYPE OF APPLICATION: ☒ New ☐ Continuation ☐ Revision If Revision, enter appropriate letter(s) in box(es): ☐ ☐ A. Increase Award B. Decrease Award C. Increase Duration D. Decrease Duration Other (specify):			A. State H. Independent School Dist. B. County I. State Controlled Institution of Higher Learning C. Municipal J. Private University D. Township K. Indian Tribe E. Interstate L. Individual F. Intermunicipal M. Profit Organization G. Special District N. Other (Specify): non-profit rehabilitation hospital		
9. NAME OF FEDERAL AGENCY: U.S DEPARTMENT OF EDUCATION			10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: 8 4 1 3 3D		
11. AREAS AFFECTED BY PROJECT (cities, counties, states, etc.): Department of Education Federal Region #VI			12. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT: Regional Disability Business Accommodation Center--Region VI		
13. PROPOSED PROJECT:		14. CONGRESSIONAL DISTRICTS OF:			
Start Date 10-1-91	Ending Date 9-30-96	a. Applicant 18.		b. Project 18	
15. ESTIMATED FUNDING:		16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?			
a. Federal	\$ 324,858 .00	a. YES THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE _____			
b. Applicant	\$ 102,804 .00	b. NO: ☒ PROGRAM IS NOT COVERED BY E.O. 12372			
c. State	\$.00	☐ OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW			
d. Local	\$.00				
e. Other	\$.00				
f. Program Income	\$.00	17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?			
g. TOTAL	\$ 427,662 .00	☐ Yes If "Yes," attach an explanation. ☒ No			
18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED					
a. Typed Name of Authorized Representative Louisa Adelung		b. Title Executive Vice-President and COO		c. Telephone number (713) 797-5280	
d. Signature of Authorized Representative 		e. Date Signed 8-5-91			

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SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Knowledge Dissemination & Utilization Program	84.133D	\$	\$	\$ 324,858	\$	\$ 324,858
3.						
4.						
5. TOTALS		\$	\$	\$ 324,858	\$	\$ 324,858

SECTION B - BUDGET CATEGORIES					
6 Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY				Total (5)
	(1)	(2)	(3)	(4)	
a. Personnel	\$	\$	\$	\$	\$ 98,659
b. Fringe Benefits					26,145
c. Travel					7,820
d. Equipment					2,800
e. Supplies					6,000
f. Contractual					36,000
g. Construction					-0-
h. Other					126,245
i. Total Direct Charges (sum of 6a - 6h)					303,669
j. Indirect Charges					21,189
k. TOTALS (sum of 6i and 6j)	\$	\$	\$	\$	\$ 324,858
7. Program Income	\$	\$	\$	\$	\$

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SOUTHWEST REGIONAL DISABILITY AND BUSINESS ACCOMMODATION CENTER (RDBAC)

(a) Potential Impact of Outcomes: Importance of the Program

(1) Relationship to Announced Priority. The activities of the proposed Region VI Regional Disability and Business Accommodation Center (RDBAC) relate directly to NIDRR's announced priority for establishing and operating regional disability and business accommodation centers. The proposed RDBAC will address ADA-related informational needs for Region VI, comprised of Arkansas, Louisiana, New Mexico, Oklahoma, and Texas. Specific activities to address ADA-related informational needs are discussed in detail under Section C (Program/Project Design), and entail establishing a RDBAC that will coordinate development and support of state and local resource groups.

To operate the RDBAC, ILRU has formed partnerships with the Better Business Bureau (BBB) and with The University of Texas at Austin School of Business. To the partnership, ILRU brings knowledge of disability issues, experience in designing and conducting disability-related training and technical assistance, and access to organizations serving people with disabilities. The BBB brings a membership of 35,000 business and 31 member offices located in the five-state region and experience in delivering timely and useful information to business and consumers. BBB also delivers to the partnership direct and immediate access to a network of over 700,000 member and nonmember businesses within the five-state region. The University of Texas School of Business contributes extensive experience in conducting applied research and providing training targeted specifically to business professionals. These partnerships provide ILRU with access to expert assistance in developing training targeted specifically to business professionals and will increase the likelihood that methods and formats are appropriate and take into account the special needs of this target audience.

In general, the RDBAC will perform the four basic functions--disseminate information, provide technical assistance, provide referrals for specialized information, and conduct training--required of all RDBACs. These functions will be carried out through development of an extensive network of business groups, disability organizations, governmental bodies, non-profit service agencies, educational institutions, the public media, and representatives of the general public. The processes through which this network will be established and operated and specific objectives to be addressed through RDBAC activities are discussed in detail under Section C, Program/Project Design.

(2) Likelihood of Producing New and Useful Information. Although the proposed RDBAC is not a research project in the traditional sense of the word, a great deal of new and useful information is expected to be produced. For example, a portion of the activities to be carried out through the RDBAC are designed to assess the extent to which ADA-related information is available to businesses, people with disabilities, people in government, and elsewhere. Additionally, the evaluative activities of the RDBAC will focus on identification of ADA provisions and implementing regulations that pose particular difficulties for covered entities, so that strategies for minimizing such difficulties can be formulated and tested.

In this regard, the RDBAC activities will be augmented with research data generated through ILRU's NIDRR-funded field-initiated research (FIR) project, begun in June 1991, to assess the capabilities of staffs of independent living centers to provide ADA-related services to consumers, businesses, and others in their communities. The results of activities carried out through the proposed RDBAC and ILRU's ADA-related FIR project will provide a wealth of new data on ADA implementation that can be used in developing innovative strategies for ADA compliance and for evaluating and refining regulations put in place to facilitate implementation of the legislation. Details on the types of new information to be generated through RDBAC activities and possible uses

of such information are provided in Section E, Evaluation Plan.

(3) Need and Target Population. On July 26, 1990, President George Bush signed Public Law 101-336, known as the Americans with Disabilities Act (ADA). This historic event ushered in a new age of opportunity for Americans who have disabilities. It also offered a new set of challenges to businesses and private and public service organizations to demonstrate in concrete ways what they are doing to assure that they are not discriminating--intentionally or unintentionally--against persons with disabilities in terms of employment, access to services, or in other ways that diminish opportunities available to people with disabilities. ADA is designed to insure rights of persons with disabilities under four specific and one general section of the Act that are briefly summarized in an appendix to this proposal.

At present there are no definitive data on the numbers of organizations in the public and private sectors that are actively seeking information on ADA, its provisions, and regulations. Through its extensive contacts with individuals in the field of independent living, ILRU has gathered information suggesting that the more than 350 consumer-controlled independent living centers operating nationwide are dealing with thousands of requests daily. Over the past year and one half, ILRU has been querying center managers participating in its management training programs concerning the numbers of ADA-related information requests that they have been receiving. Responses to these queries indicate that independent living centers that were receiving only a few calls per month during the days when ADA legislation was being considered in Congress are now receiving daily requests for ADA-related information from persons with disabilities, employers, and numerous public and private concerns. Managers from some centers have indicated that their staffs are being inundated with calls from a wide range of individuals in their communities wanting to know what ADA means for them and, in the case of employers and other businesses, what they will be required to do in order to be in compliance with ADA (ILRU, 1990).

These reports from the field led ILRU to request and receive a field-initiated research (FIR) grant previously referenced. Results of this FIR project will strengthen the efforts of the proposed RDBAC by further defining the quantity and quality of information on ADA available to people working in independent living centers and by identifying questions concerning ADA and its provisions that are difficult to answer.

As regards the quantity and quality of information on ADA currently available to business people, there is little firm data available. ILRU staff and collaborators on the project are very aware of the amount of information available (see review of literature in the appendix) and seminars and conferences being conducted by legal firms and other "experts" on ADA. The prices being charged for these information-sharing programs range from small (e.g., under \$50 per person) to quite large (e.g., more than \$1,000 per person). However, with ADA-related regulations having been only recently developed by most federal agencies, it is certain that much of the information presented during earlier offerings on ADA was speculative in nature, based upon individual perceptions of what the regulations would require. In fact, communication with Mr. John Etchieson of the Austin Better Business Bureau indicates that their member businesses have been contacted with offerings by legal firms to provide ADA training or information, usually at relatively high participant cost and often focusing on ways to avoid or circumvent ADA provisions rather than on options for coming into compliance.

With these observations as a basis, the proposed project has identified a number of audiences that will be targeted through activities of the RDBAC. The primary target audience will be businesses in the five-state area. The rationale for focusing on businesses is based on a number of factors, including:

- there are an estimated 700,000 businesses in the five-state area (BBB estimate);
- many businesses may perceive ADA as threatening because of lack of understanding of its provisions and the meaning of these provisions to them;
- businesses may be getting inaccurate information concerning the ADA, its requirements for reasonable accommodation and accessibility modifications, and options available to them in and costs involved; and
- inaccurate information on ADA provided to businesses may contribute to negative impressions of the intent and requirements of ADA and may result in negative "backlash" if business people are not provided with accurate information on the actual ADA requirements and options available for compliance with it.

Although the primary audience for RDBAC activities is business organizations in the five-state region, other important audiences that will be targeted by RDBAC activities include individuals with disabilities and organizations representing them, state and local governments, non-profit service agencies, educational institutions, and the general public. Individuals with disabilities and organizations representing them have been the primary targets of ILRU's efforts since its inception in 1978. ILRU has developed a reputation for providing high quality and usable information to consumer-controlled organizations on a wide variety of topics ranging from disability rights to organizational management. ILRU has developed close working relationships with all 24 independent living centers in the five-state region and has provided direct training to staff of 17 of these centers. ILRU communicates regularly with these centers through its bi-monthly newsletter ILRU Insights and through a variety of other mechanisms, including computerized bulletin boards, special mailings, and frequent telephone contact.

The independent living centers will provide the primary but not the only avenue for communicating with people with disabilities in the five-state region. ILRU also has established functional contacts with: state coalitions of people with disabilities, such as the Coalition of Texans with Disabilities; state governor's committees on persons with disabilities; various organizations (e.g., United Cerebral Palsy, Developmental Disabilities Councils) serving people with disabilities; and with a variety of other individuals and groups involved in disability issues. These contacts will be exploited for this project.

The other target audiences--state and local governments, non-profit service agencies, educational institutions, and the general public--are also groups with which ILRU has substantial experience. ILRU's efforts to provide disability-related information to a wide range of audiences have grown continuously. These efforts involve more than 13,000 mailings per year. A cursory review of requests during the past year indicates that approximately 40 percent of the requests for information come from independent living centers, 30 percent from other disability-related service providers, 10 percent from educational institutions, 10 percent from state and local governments, and the other 10 percent from a variety of sources, including the general public.

With implementation of the RDBAC, efforts to work with state and local governments, other community-based service agencies, and educational institutions in the five-state region will be stepped up to assure that accurate information is being conveyed to people who are involved with policy making, service delivery, and preparation of people who will be assuming professional roles in which knowledge of ADA and its provisions is essential.

In defining the target populations to be addressed through RDBAC activities, it is important to emphasize that the primary purpose of the RDBAC will be to foster mutual

understanding among the various parties affected by ADA. In order to do this, cooperative endeavors involving persons with disabilities, members of the business community, educators, policy makers, and others will need to be undertaken so that balanced and accurate information on ADA and its meaning to individuals and organizations can be disseminated effectively. The plans for the RDBAC describe how such endeavors will be undertaken.

(4) Benefit of Outcomes to Target Populations. As implied in the previous paragraphs, ADA's potential to be a positive force in opening opportunities for people with disabilities to participate more fully in the full range of activities (e.g., employment, recreation, commerce) in their communities will be influenced to a large degree by the extent to which effective ways of informing people concerning individual rights under ADA and options for insuring that those rights are not violated can be developed and implemented. The benefits to audiences specifically targeted for RDBAC activities include,

For businesses, enhanced understanding of requirements under ADA regarding:

- specific provisions of ADA, entities covered by ADA, and time frames for implementation of ADA and its regulations;
- employment of persons with disabilities, options available in making reasonable job accommodations, and areas of the law in which requirements are not clear and have not yet been put to the test in court;
- accessibility by persons with disabilities who may be consumers of business products and services;
- various options, including costs, in making reasonable accommodations and business accessibility modifications;
- options, other than legal action, for resolving disputes arising from accusations of discriminatory practices;
- legal recourse available in the event of accusations of discriminatory practices in hiring, management, or day-to-day business operations; and
- sources of information on ADA and its provisions and regulations and on resources available to assure compliance with the law, including information on accommodation and accessibility options and their short-term and long-term costs.

For persons with disabilities and organizations representing them, accurate information on:

- specific provisions of ADA, entities covered by ADA, and time frames for implementation of ADA and its regulations;
- sources of assistance in dealing with employers, businesses, government agencies, and other organizations that may be limiting access because of a lack of knowledge or understanding of ADA requirements;
- options that can be presented to employers, businesses, government agencies, and others for coming into compliance with ADA through steps that take into account costs and other available resources;
- effective strategies, in addition to legal action, for settling disputes arising from perceived discriminatory practices;

- legal recourse and paths for pursuing such should other means of dispute resolution fail in cases of perceived discriminatory practices; and

- sources of information on ADA and its provisions and regulations and on innovative approaches that have been used in reasonable accommodation and in improving accessibility throughout their communities.

For state and local governments information on:

- questions of access to public facilities and services;
- resources and strategies for creating full access to public facilities and services;
- responsibilities for monitoring and enforcing compliance with ADA provisions and regulations at state and local levels;
- types of sanctions and their implications for state and local government bodies that fail to come into compliance with ADA provisions and regulations;
- options, other than legal action, for resolving disputes arising from alleged non-compliance with ADA on the part of state and local governments;
- legal recourse available to state and local governments accused of discriminatory practices relating to disability; and
- sources of assistance on the implications of ADA and its provisions for state and local governments and on practical strategies for coming into compliance with the legislation.

For educational institutions, benefits from this project will include:

- acquisition of current materials on ADA and its provisions for use in teaching students in business programs and in disability-related programs of study, including rehabilitation counseling;
- development of a cadre of informed business people, people with disabilities, and others knowledgeable about ADA and its provisions who can serve as lecturers and resource people for educational activities;
- opportunities to identify sites for research on effective strategies for reasonable accommodation and enhanced accessibility in a variety of business settings;
- expanded contacts with people in a variety of business settings who can assist with placement of students--with and without disabilities--in learning practical and in entry-level jobs following completion of studies; and
- establishment of outlets in the business and disability communities for disseminating research results focusing on reasonable accommodation and improved accessibility to products and services; and

For the general public, the project will have benefits in:

- increasing awareness of the contributions that people with disabilities can make to their communities;
- fostering employment of people with disabilities, thereby reducing funding

required for public benefit programs targeted to unemployed persons and increasing income and related tax revenues; and

- opening a wide variety of options for people who may, in the future, experience disabilities themselves or with family members--this is particularly true for older persons who may wish to continue working and remaining active in community activities beyond traditional retirement age, but who acquire one or more disabilities (e.g., mobility impairment, hearing impairment) that are more prevalent among older persons.

(5) Training Needs. Training needs to be addressed through the RDBAC are implied in the previous discussions and focus on assuring understanding on the parts of business people, people with disabilities, and others from target groups with regard to: intent of the ADA legislation; entities covered by the ADA legislation; time frames for implementation of various provisions of the legislation; specific requirements of ADA provisions with which employers, businesses, public and private service agencies, governmental bodies and others must comply; options for making job accommodations and building accessibility modifications; and options for resolving disputes that may arise relative to ADA and its provisions.

In addition to these obvious needs identified by NIDRR and others involved in development and implementation of regulations and monitoring compliance with ADA provisions, there are some training needs specific to each target audience that ILRU and its partners have identified. For example, individuals in the business sector require training on disabilities and their influence on peoples' lives and work capabilities. Training of this type will focus on sensitivity to disability issues, including language and behavior that is appropriate in interactions with people who have disabilities. It will also focus on risks associated with generalizations concerning functional capabilities of people with disabilities as well as potential problems associated with making assumptions about the types and costs of accommodations and/or accessibility features required by an individual with a disability.

Conversely, training provided to persons with disabilities will cover not only the provisions of ADA, but will also focus on the real constraints under which many businesses, especially small businesses operate--particularly with respect to costs associated with making worksite accommodations. The primary emphasis in this regard will not be on trying to discourage people with disabilities from pursuing job opportunities in various settings, but rather to increase awareness on the part of disabled individuals regarding the concerns of business people who may be potential employers. Consumer training will focus on development of negotiating skills to be used in working with potential employers and business people to make job accommodations and to improve accessibility.

The purpose of these training programs will be to assist people with disabilities and/or advocates in developing strategies for working cooperatively with employers and members of the business community in making workplace changes without using confrontational techniques. This approach offers not only access to jobs, but also increases the likelihood that people with disabilities will begin employment on a positive note, rather than starting a job that has been obtained through real or implied threats of legal action against an employer. The goal of the final portion of the training will be to instruct people with disabilities and advocacy groups to address community issues using staged strategies, in which the first stages are requests and offers of assistance in making changes, followed by information concerning legal requirements for reasonable accommodation and accessibility, followed by information on additional sources of technical assistance, and continuing toward resolution of the problem, with legal action being the final stage if other negotiating methods fail to produce desired results. Business people will be fully involved as trainers for this portion of the program for the purposes of providing information on factors that influence business decisions and that might need to be addressed during negotiations

and to suggest alternate strategies that might be used in specific types of negotiations.

In addition to training needs focusing on the specifics of ADA, there are training needs associated with preparing people to be effective trainers and resource persons in their respective communities. Although initially a good part of the training will be conducted in Houston and in selected sites in the other four states of the region, ultimately the RDBAC will be most effective through the preparation of informed and capable individuals who can conduct training and serve as resource persons in areas throughout the five-state region. For this reason, a significant portion of the training program will involve helping business people, people with disabilities, and others from all areas of the targeted states to conduct training programs and to serve as local resource people. This component of training will focus on methods for gauging the level of the audience (e.g., how well do they understand ADA and what are their concerns about its implementation), determining if you (the trainer/resource person) can provide information appropriate to the level of the audience, presenting information in an incremental fashion so that understanding will build, using resource materials (e.g., manuals, audiovisuals) effectively to support training, finding out if people obtained the information sought, and effectively referring people to other sources of information to answer questions or obtain additional information. In addition, this "training the trainers" aspect of the program will focus on assuring that people doing training in the five-state region have current information on resources available to them and on ways of obtaining additional information.

Finally, but importantly, this part of the training will prepare trainers and resource people to present themselves accurately with respect to their roles in the RDBAC. In order to protect individuals and organizations from liability, it is important that trainers and resource people understand that their roles are to inform people about provisions of the law and its regulations and to suggest and to discuss options for dealing with problems that may arise, but not to advise individuals or organizations on particular courses of action. In cases where trainers or resource persons are also professionals, such as attorneys or engineers, it is important that they clarify with trainees and people requesting information that expert advice on a specific course of action to be followed might be available on a contractual basis arranged between themselves and the individual or group seeking such services, but that such services are not part of their responsibilities to the RDBAC. Role delineation with respect to responsibilities to the RDBAC versus other professional responsibilities and personal agendas will represent an important aspect of the training program for persons involved in RDBAC activities.

(6) Meeting Defined Needs with Training Methods and Subject Matter. One strength that ILRU brings to the proposed RDBAC is its experience with training in general and with training on disability-related topics in particular. Over the last seven years, ILRU has been the recipient of funding from the Rehabilitation Services Administration to offer training to both executive directors and middle managers of independent living centers. This training has used a participatory format to explore a wide range of issues, including issues of personnel management, reasonable accommodation, and community advocacy on accessibility to facilities and services. It also involves planned follow-up with trainees to assess their use of training information in their jobs and to provide additional resources that enhance management skills in specific areas. This model will be used in providing initial training on specifics of ADA and how to disseminate ADA-related information to others, followed up by ongoing monitoring and resource augmentation. It is a model with which ILRU has extensive experience, and one that lends itself well to the RDBAC activities.

Recognizing that our greatest weakness vis-a-vis the proposed RDBAC is in our relatively limited experience in working with businesses, ILRU has formed partnerships with the Better Business Bureau (BBB) and with The University of Texas at Austin School

of Business. These partnerships will provide ILRU with access to expert assistance in developing training targeted specifically to business professionals and will increase the likelihood that methods and formats used in training for business professionals are appropriate and take into account the special needs of this target audience.

The training subject matter has been defined in large part by the provisions and regulations of the ADA itself and by recognition of the types of activities that need to be carried out effectively in getting appropriate information to the field. Training methods will draw upon ILRU's extensive experience in meeting the needs of individuals and groups in disability-related fields and will involve use of a variety of formats, including lectures, small and large group guided discussions, simulation techniques, case studies, and long-term follow-along. It will also capitalize on the strengths of the BBB in working with business groups in doing a variety of activities, including offering seminars and other learning programs on ADA, providing ADA-related information through their "Tel-tips" phone-in information service, and featuring ADA-related stories in their business magazines and other publications. Additional detail on the content and methods planned for training activities is provided in Section C, Program/Project Design.

(7) Need for Information Exists. That the need for information exists is evidenced by the fact that several federal agencies have budgeted substantial support for information dissemination activities. However, in addition to the evidence offered by this resource commitment at the federal level, there are other indicators that information needs exist. Although no precise data on numbers of ADA-related offerings by legal firms and other professional groups has been compiled, it would be safe to say that there are dozens of such offerings around the country every week. However, these offerings are targeted primarily at large employers and other entities with the money to pay what are often substantial fees and according to contacts in the business field, often focus on methods for circumventing the provisions of ADA, rather than on complying with provisions. To a large degree these offerings are not meeting the needs of smaller employers and are usually not targeted at all to groups of persons with disabilities.

As regards evidence of informational needs by persons with disabilities, ILRU has a much clearer picture. Because of our ongoing contact with a wide variety of disability-related service organizations, ILRU staff are aware of the most current informational needs of persons with disabilities and of service organizations in the disability arena. It can be stated unequivocally, that since passage of the ADA in July 1990, the type of information most frequently requested by people contacting ILRU relates to ADA, its provisions, and its meaning to them and to their communities. At minimum, five requests for ADA-related information are handled by ILRU every working day. Many of the questions are about the schedule for availability of implementing regulations, but other questions are about sources of assistance to help organizations come into compliance, methods for determining compliance, and interpretation the language of the law.

In response to the steady stream of requests for ADA-related information, ILRU has begun assembling technical assistance resources and has been identifying groups and individuals who are knowledgeable concerning ADA and its provisions. The proposed RDBAC will provide support to further expand these informational resources and will allow for creation of the structure to address more effectively the information needs that are so clearly evident.

(b) Potential Impact of Outcomes: Dissemination/Utilization

(1) Likelihood that Results Will Become Available to the Field. As with training, one of the strengths that ILRU brings to this project is its extensive and proven experience in bringing information to the field. ILRU pioneered efforts to bring

consumer-developed and consumer-focused information to disability-related service organizations. Since 1978, it has edited and distributed a bi-monthly newsletter to service organizations internationally and has produced and distributed brochures, monographs, and other materials on a wide variety of topics, ranging from board effectiveness in non-profit organizations to carrying out effective community-based advocacy. ILRU is recognized internationally as a resource for information on disability rights and on consumer involvement in disability-related service programs. It has earned a reputation for excellence in its training and technical assistance activities and is one of a handful national disability organizations in the country that adheres to the philosophical commitment to consumer control that is critical in maintaining credibility with consumers at local, state, and regional levels.

ILRU will be partnering with the Better Business Bureau to access its extensive array of business contacts and resources in providing project results to business enterprises in the five-state region in an effective and timely manner. As alluded to earlier, the BBB has extensive methods for communicating with the business community. Among these are the toll-free 800 Tel-tips line currently available to businesses in Texas that will be expanded to the four other states, a monthly business magazine that is distributed to all 35,000 member businesses and to the 31 BBB offices located in the five-state region for distribution to non-member businesses, and excellent relationships with local media representatives who can assure that ADA-related press releases and stories find their way into the broadcast and print media.

In summary, the dissemination resources brought to the RDBAC by the participating organizations are substantial and have been proven effective over years of development and refinement.

(2) Means for Disseminating and Promoting Utilization by Others. In addition to the training programs and technical assistance activities to be carried out with organizations within the five-states comprising Region VI, the primary partners in the proposed RDBAC have extensive contacts nationally and internationally that will be used in disseminating outcomes beyond the five-state area and in promoting use of effective strategies and materials in other parts of the country. ILRU is one of two NIDRR funded national research and training centers (RTC) on Independent Living and has a responsibility through the RTC to disseminate relevant information to the field. As previously mentioned, ILRU produces and distributes a bi-monthly newsletter to nearly 4,000 disability-related service and advocacy organizations throughout the country. It is used regularly as a vehicle for informing disability-related organizations about ILRU's research, training, and technical assistance programs and how to access ILRU products and services. ILRU also produces and distributes at nominal charge brochures and publications focusing on results of research projects and issues identified as important by the field. ILRU participates in two computer networks--one operated out of the University of Oregon and serving a number of rehabilitation professional groups, including independent living, and one operated by the New England Coalition of Independent Living Centers that has a smaller but growing user constituency composed of organizations active in the disability movement--that will be used to disseminate information about RDBAC activities, products, and services. ILRU staff also participate in a variety of presentations to professional and consumer groups each year and use these opportunities to distribute information about research and demonstration results. ILRU has funding from The Robert Wood Johnson Foundation, for its national project on Improving Service Systems for People with Disabilities, that involve carrying out a national media campaign designed to focus attention on key issues relevant to disability policy, including health and supportive services for people with disabilities and the influences of employment and community access on these services. Negotiations are underway to hire an experienced media professional to direct this campaign, and this new initiative will provide another vehicle through which to disseminate results of RDBAC activities.

In addition to the dissemination resources of ILRU, the BBB brings to the RDBAC an array of dissemination resources that include: (1) a toll-free information number that allows users to select specific information from a menu operated remotely from a touch-tone telephone or to request personalized technical assistance from an operator who passes the request to the appropriate person; (2) a monthly business magazine; (3) regularly scheduled business seminars open to representatives of all businesses; (4) instructional videos on specific topics; and (5) access to media representatives in 31 cities in the region. A very important resource that the BBB brings to the RDBAC are extensive data bases on businesses and consumers in all five states. Access to these data bases will allow the targeting of RDBAC outreach efforts to specific audiences. For example, a specialized program may be developed to explain ADA and its provisions to staff people of temporary personnel services. With access to the BBB data base, all personnel services in a specific area could be contacted and recruited to participate in the training program. The BBB data files represent an important complement to the data that ILRU has on disability organizations and service providers and will be an invaluable resource in disseminating project information.

The collective resources of ILRU, the BBB, and the other organizations collaborating in RDBAC activities offer a wide variety of approaches for disseminating the results of project efforts and for promoting use of RDBAC products--both materials and methods--by others.

(3) Packaging Training Methods and Content for Use by Others. Packaging of training methods is another area in which ILRU has pioneered innovations. In 1980, ILRU entered into a collaborative relationship with faculty of the Cornell University School of Industrial and Labor Relations to develop and offer an independent living center management training program using a simulation methodology that had not been previously applied in independent living. After testing and refining the program, it was packaged and used for training in more than 20 locations around the country. That training program has been cited by many in the field as one of the best in which they had ever participated. The success of the training program using simulation methodology led to development by Cornell University faculty and ILRU staff of an advanced management training program using a similar methodology that has subsequently been tested and refined and is now available to the field on demand.

In 1984, ILRU received funding from the Rehabilitation Services Administration to conduct a long-term training program for executive directors of independent living centers. Recognizing the unique needs of the independent living field, ILRU designed and offered a training program that could be tailored to the specialized interests and previous experiences of trainees, that covered management problems unique to the field of independent living, and that could be continued over time with the trainee back on the job periodically receiving information and interest-specific support materials and follow-up via mail and telephone. One of ILRU's strengths in serving the independent living field has been its capabilities to develop and package training materials with content appropriate to target audiences, in formats that members of target audiences find accessible and usable, and that are priced to fit within the limited budgets under which most centers for independent living and many other consumer organizations served by ILRU operate. ILRU's emphasis has been on low-cost printed and audio-taped materials that are affordable to organizations with limited budgets, and that can be used in homes and offices without high cost equipment by people with various types of sensory and functional disabilities. Materials are also made available in computer diskette formats; but it has been ILRU's experience that many individuals with disabilities and a significant number of independent living centers do not have computer equipment, thereby limiting use of this format thus far.

By contrast, the BBB has many member businesses with capabilities to access materials packaged in video and/or computer formats. For these business organizations, training materials will be prepared in formats that can be accessed using technology

available to member organizations, with alternate formats such as print media, being available to smaller businesses that do not have the hardware to access electronic media. One training format that the BBB has expressed particular interest in is instructional videotapes for distribution to its 31 offices throughout the region.

The experiences and knowledge of the BBB in working with the business audience and the complementary experiences and knowledge of ILRU in working with independent living centers and other disability-related service and advocacy organizations assures that the packaging and formats used in training activities targeted to various audiences will be appropriate and that the special interests and needs of those audiences will be addressed though both content and methods used. It should be noted that all materials developed for this project will be made available in braille or audio tape formats for people with visual impairments and will be made available in Spanish translations.

(4) Utilization Approach in Addressing Defined Need. The utilization approach has been developed expressly to address the defined needs of target populations. Specifically information gathered and/or generated through RDBAC activities will be used to address the previously defined needs of the target populations. All target populations will be provided with information on ADA and its provisions in formats that are appropriate to their levels of knowledge and that are suitable for the technology available to access such information. Furthermore, ILRU's collaborations with the BBB and with the business schools at The University of Texas and the University of Houston were developed specifically to assure that the channels used to communicate with businesses targeted through RDBAC activities are ones that are familiar to business people.

(c) Probability of Achieving Project Outcomes: Program/Project Design

(1) Objectives of the Project. The objectives of the RDBAC are:

- To provide ADA-related information to target audiences in the region using a variety of media and focusing specifically on disability awareness; the provisions of ADA; the impact of ADA on public accessibility; ADA's impact on the hiring process; reasonable accommodation; accessibility and accommodation in communications; and empowerment of individuals with disabilities to participate in successful implementation of ADA.
- To provide and distribute information about the RDBAC and its activities in facilitating implementation of ADA, including its implications for disability, business, and other groups in the five-state region.
- To develop and/or strengthen linkages to business organizations, state and local governments, service organizations, labor organizations, educational institutions, regional and local media, voluntary organizations, and other potential outlets or conduits for the dissemination of information in the region.
- To develop and implement a plan for marketing RDBAC services to target audiences, building upon the existing marketing capabilities of ILRU, the BBB, and other organizations collaborating in the RDBAC.
- To conduct an assessment of the informational needs of preferred information conduits of employers and commercial establishments, and of the disability, public agency, labor, and service provider communities in the region.
- To develop and offer training programs to organizations representing employers, people with disabilities, representatives of state and local governments, service providers, commercial establishments, labor organizations, voluntary associations, education professionals, and others and focusing on general issues of disability;

provisions of the ADA; accessibility; hiring; early intervention in disability at the workplace; reasonable accommodation; communications accessibility; and empowerment of individuals with disabilities in effectively participating in implementing the provisions of ADA.

- To develop information resources, databanks, reference guides, and pools of experts throughout the region that can be used effectively in providing technical assistance to target audiences.
- To provide immediate referrals whenever possible to individuals from any of the target populations seeking specialized information or technical assistance not readily available through the first point of contact.
- To provide directly and/or arrange for technical assistance on the range of options available to employers on issues of hiring, early intervention in disability at the workplace, and reasonable accommodation on the job.
- To provide directly and/or arrange for technical assistance on the range of options available to businesses in meeting requirements for accessibility and public accommodation for people with disabilities.
- To establish linkages with NIDRR-funded materials development projects, other RDBACs, the coordinating entity for federally funded ADA activities, and other organizations to secure and apply materials developed on ADA implementation and to assess their effectiveness when used in conjunction with materials prepared or adapted for use by the RDBAC.

(2) Soundness of Hypothesis to Be Tested. Although this is not a research project, the preparers of this application have formulated a hypothesis that will be tested through the activities described in ensuing sections. Simply stated, the hypothesis to be tested is: Through collaborative efforts, individuals with disabilities, consumer groups, members of the business community, representatives of government, educators, and others from the public and private sectors can effectively disseminate information about the Americans with Disabilities Act (ADA) and its provisions so that people with disabilities benefit in terms of enhanced opportunities to participate in and improved access to all aspects of community living. The activities described in subsequent sections of this proposal are designed to test this hypothesis.

(3) Appropriateness of Project Design/Methodology in Meeting Objectives. The project design to be employed in meeting the stated objectives is based upon a few assumptions as follow:

- Quality control is a critical factor in the success of RDBAC efforts. It is imperative that the information being provided by individuals associated with RDBAC activities be as accurate as possible. Inaccurate or incorrect information provided to people with disabilities, business people, or others seeking assistance from the RDBAC, could cause significant damage to efforts to implement ADA effectively.
- Managed decentralization of RDBAC functions is the best way to assure that high quality assistance relating to implementation of ADA is readily available to individuals and groups in all areas of the region. With adequate quality control mechanisms in place, the development of resource pools throughout the region offers the best likelihood that people in various parts of the five states can access ADA-related assistance in a timely manner and can obtain information that is relevant in terms of state and local factors, including availability of transportation services, personal assistance services, employment opportunities, etc., of which staff in a centralized office may be unaware.

- Coordination of decentralized activities conducted throughout the region can be effectively managed through the program office. Notwithstanding the need for decentralization, the coordination of activities can be carried out effectively through a central program office that is (a) directed by someone who is knowledgeable about ADA and resources available in the region to facilitate its implementation and (b) staffed by a qualified full-time professional with adequate support from other professional and non-professional staff.

- Monitoring of the quality of RDBAC efforts and assessment of their effectiveness in addressing ADA implementation needs is required to assure quality. In order to be assured that quality standards are being maintained in all five states targeted for RDBAC activities, ongoing monitoring will need to be carried out and regular assessments of both the quantity and caliber of efforts in each state will need to be made. These functions are built into the project design and are meant to "close the loop" in terms of quality assurance, with the quality of initial efforts depending upon sound preparation of resource persons, followed by easy access to these individuals at state and local levels, supported through coordination provided by a central program office, and monitored using accepted project evaluation techniques carried out by an experienced staff.

Based upon these four assumptions, the design for this project has been constructed around an overlapping 10-step process as follows:

1. Assemble and prepare the management team that will have primary responsibility for development of the quality assurance plan, coordination of decentralized activities, and monitoring of RDBAC activities.

2. Secure available ADA informational and training materials and assess them in terms of appropriateness for specific audiences, currency with respect to release of regulations and other information, ease of use, costs, and information available from previous users.

3. Assure the appropriate involvement of collaborating organizations in carrying out RDBAC activities according to mutually agreed upon assignment of responsibilities and specific timelines.

4. Conduct a needs assessment of businesses, public agencies, and disability groups in the five-state area for the purposes of clarifying informational needs relative to ADA and preferred conduits for receiving such information, and analyze results of this assessment in light of results from a similar assessment of needs of independent living center staff being conducted by ILRU through an NIDRR-funded field-initiated research project.

5. Develop a centralized resource pool to serve the program office and initiate activities to begin building resource pools to serve locales targeted for the first stage of decentralization.

6. Conduct initial training of individuals from the five-state area who will serve as trainers and technical assistants in their local areas and provide them with resource materials required to begin activities within areas adjacent to their home communities.

7. Assess the effectiveness of the first group of trainers/technical assistants in terms of numbers of individuals and organizations participating in RDBAC activities in local areas and the perceived quality of the information received and make modifications in the training methods and materials as required to address weaknesses.

8. Continue decentralization of training and technical assistance functions through preparation of other people with disabilities, members of business communities,

government employees, and others who have been identified through local contacts as being interested and capable to serve in trainer/technical assistance roles and maintain efforts to evaluate the quality and quantity of activities carried out by these local resource people.

9. Evaluate summatively the effectiveness of RDBAC efforts in facilitating implementation of ADA in the five-state region and prepare a comprehensive report on the scope of efforts carried out in the region and results obtained through application of quantitative and qualitative measures of those activities.

10. Maintain beyond the five-year funding period, with support provided by cooperating institutions and business partners, the RDBAC as an ongoing regional resource on disability issues that can be accessed by anyone concerned about the rights of persons with disabilities and options available from a wide range of community resources to secure and protect those rights.

The manner in which this 10-step process is to be carried out over the five-year period of federal funding is described briefly below. It should be noted that the stepped process indicated above is used primarily to differentiate between different functional groups of activities that have specific foci. In fact, many of the activities carried out under different steps will overlap in terms of both time and purpose. It is not the intent in using this approach to suggest that these are all discrete functions that can be neatly separated and categorized, but rather to demonstrate that the proposal preparers have carefully considered major functional issues that need to be addressed and have developed a process for addressing these issues in an integrated and timely fashion.

Step 1: Assemble and prepare the management team. Activities under this step have already begun. The management team that will be involved with this project was, with one exception, responsible for conceptualizing the plan to be used in establishing and operating the RDBAC and for identifying key players who will serve as collaborators and consultants during initial phases of the project. The exception relates to the project coordinator, Wendy Wilkinson, J.D., who has been hired and will be joining the ILRU staff in the near future. As she is currently transitioning out of her position as advocacy director at the Houston Center for Independent Living, she has been kept informed about the development of the RDBAC proposal and is enthusiastic about the idea of applying her knowledge of law and experience in disability-related activities to a project designed to facilitate implementation of ADA.

This step may appear to some to be obvious and unnecessary in terms of a presentation of functional responsibilities. While it is obvious that the management team will need to be assembled early in the project, the proposal developers are convinced that, because of the complexity of the project and the territory to be covered by project activities, development of and adherence to a sound management plan is absolutely essential if RDBAC efforts are to be successful. Consequently, it has not been taken for granted that good management will occur automatically, and as much attention will be devoted to project management and coordination as is devoted to other critical aspects of the project, such as training and technical assistance.

In terms of actual activities to be carried out under this step, the following sequence of events is expected to occur.

- The day following notification of a grant award from NIDRR the first management planning meeting will be held to review the plans and requirements for the RDBAC and to assign responsibilities and set specific deadlines for task completion.

- Options for the first meeting of selected collaborating partners will be identified and staff will be assigned to contact specific individuals to determine the

best option for a meeting to be held within two weeks.

- The project coordinator will be charged with preparing, in collaboration with the project director and other staff, a preliminary schedule for major activities (e.g., resource requests, training programs, initiation of components of the technical assistance program), that can be reviewed with primary collaborators at the first full RDBAC meeting.

- Following the first full RDBAC meeting involving collaborating partners, the schedule of major activities will be finalized, responsible parties for each activity will be identified, and the schedule will be distributed to collaborating partners requesting that it be reviewed and a copy returned to the program coordinator within one week indicating any potential problems and identifying personnel at the collaborating organization who will be responsible for each major activity identified.

- A quality assurance plan, for distribution by the middle of the second project month, will be prepared by the project coordinator working with the project director, other project staff, and representatives of collaborating organizations, indicating the types of project information to be gathered from each organization, the persons responsible for providing information, and the timelines for reporting.

- The project coordinator will subsequently be responsible for preparing, by Friday of each week, a detailed task schedule for the following week's activities and for meeting with the project director to review the schedule before distribution to staff and, via FAX, consultants from collaborating organizations.

- Meetings of the full ILRU project staff (and selected consultants when appropriate) will be held once each month at minimum to review project progress and upcoming activities and to discuss problems requiring resolution.

- Meetings between the project coordinator and staff of the prime collaborating organization, the Better Business Bureau, will be held every other month (with sites for the meetings alternating between Houston and Austin so that the project coordinator becomes familiar with staff and operations of the BBB and vice versa) to review progress and upcoming activities and to discuss problems requiring resolution.

- Meetings of representatives of all collaborating organizations will be held at least twice yearly, with additional meetings to be held among project staff and selected organizational representatives as needed to address specific issues.

Step 2: Secure available ADA informational and training materials. As with Step 1, activities under this step have been underway for some time. As alluded to earlier, ILRU has an NIDRR-funded field initiated research (FIR) grant to assess the capabilities of independent living center staffs to deliver ADA-related services. In conjunction with the FIR project and as part of ILRU's ongoing interest in ADA and other disability-related legislation, staff have been gathering ADA-related materials for some time. The process of reviewing these materials and categorizing them in terms of intended use (e.g., general information, technical assistance resource, training support materials), appropriateness for specific audiences (e.g., professionals in law or other disciplines, business people, people with lower educational levels), and cost and accessibility in terms of ownership and copyright has been underway for some time.

This process will be continued over the duration of the RDBAC project, and additional materials will be procured as they become available, with particular emphasis on materials that have been evaluated for use in various settings and are available at reasonable cost for distribution to RDBAC satellite locations to be established throughout the five-state region. Of special interest will be all of the publications and other resource materials developed by the ADA-focused materials

development projects, other RDBACs, and the two national peer training projects.

These ongoing procurement activities will be the primary responsibility of the project coordinator, but virtually all project staff will be engaged in identifying sources of new materials and in assisting with evaluation of materials procured. Prime project consultants at the BBB will also be involved in materials procurement activities, with particular emphasis on identifying and evaluating ADA-related materials for the business sector. Other consultants will be used to identify and review materials in selected areas such as law, engineering, and education. Because the process will be ongoing, the tasks for this component of the RDBAC are redundant, but will be initiated as follows with times for completion in parentheses at the end of the statement:

- Assemble and catalog all ADA-related materials currently available and already reviewed by ILRU staff, assign responsibilities for reviewing materials already in hand but not yet evaluated, and identify potential sources of new materials that should be contacted for input (start of month 3).

- Request information on additional materials from sources identified and compile a summary of these materials, indicating the type of material (e.g., informational brochure, curriculum outline, instructional videotape), target audience (if identified), cost, and availability (e.g., currently available, in development, restricted to certain audiences as in the case of some software) (end of month 4).

- Procure additional ADA-related materials that are available at no cost or minimal cost and materials available on a trial basis and review and categorize them for future reference (end of month 6).

- Convene a meeting of staff and selected consultants to review results of needs assessment of affected entities in the region (see Step 4 below) and to prioritize needs for additional materials in light of survey results, materials available to address needs, and funds available to purchase additional materials (start of month 7).

- Effect purchase of high priority materials needed to address identified ADA-related informational needs of the region and review and categorize materials received to assure quality and appropriateness before final payment on purchase orders (end of month 8).

- Evaluate the quality and utility of materials used in general information, training, and technical assistance activities, summarize the strengths and weaknesses of materials in meeting specific needs, and identify gaps in the availability of materials to address specific functional needs of the RDBAC program (ongoing over the project duration).

- Monitor the availability of new ADA-related materials over the duration of the five-year funding cycle and, whenever possible, secure copies for review and consideration for use in RDBAC activities (ongoing over duration of project).

- Prepare annual summaries characterizing the use of materials to support activities related to ADA implementation and identifying implementation activities for which support materials continue to be lacking or are inadequate (months 13, 25, 37, 49, 61).

Step 3: Assure the appropriate involvement of collaborating organizations.

- Notify collaborating organizations as soon as notice of an award is received and obtain options for the first full RDBAC meeting to be held in the latter half of the first month (month 1).

- Summarize the key activities to be carried out by the program office and collaborating organizations, preliminary timelines, information required from each collaborator, and unresolved issues to be covered in the first meeting and distribute to key personnel within each organization along with an tentative agenda for the first two-day RDBAC meeting to be held in Houston during the latter half of the first month (beginning of month 1).

- Confirm who from each collaborating organization will be attending the first RDBAC meeting and be sure that they have summary materials as indicated, plus a summary of ADA and its provisions and information on meeting logistics prior to the first RDBAC meeting (middle of month 1).

- Convene via teleconference the first full RDBAC meeting, review responsibilities for carrying out each aspect of the RDBAC program, clarify assignments of responsibilities among ILRU staff and collaborating organizations, and confirm timelines for completion of specific tasks over the first year of project activity (end of month 1).

- Initiate regular telephone contact with assigned staff at the prime collaborating organization, the BBB in Austin, and with other collaborators according to a pre-determined schedule to confirm that work is proceeding on schedule and that no significant problems have been encountered (weekly with the prime collaborator at BBB and on a pre-determined frequency schedule for other collaborators).

- Hold face-to-face meetings with the key staff at the BBB and other collaborating agencies according to pre-determined schedules (bi-monthly for the BBB, at least once in the last half of the project for each participating independent living center, and according to pre-determined times for other collaborators).

- Review the work completed by each collaborating agency on a quarterly basis and contact key personnel about any problems with quality or timeliness of work completed, with decisions on continued collaboration based on mutual satisfaction with work done and pending arrangements (4, 7, 10, 13, and quarterly thereafter).

- Prepare an annual report on the nature and outcomes of collaborative relationships and package it with copies of any products produced by collaborating partners for submission to the funding agency (13, 25, 37, 49, 61).

Step 4: Conduct assessments of need for ADA-related information. As indicated in the earlier, work toward completing one component of this needs assessment is already underway through the activities of a field-initiated research (FIR) project that ILRU is doing under a grant from NIDRR. Work in progress will identify needs for ADA-related information as documented by staff people working in independent living centers. The methods to be used in the FIR project involve not only queries directed to staff of independent living centers concerning their perceptions of ADA and its provisions, but also administration of instruments to measure knowledge levels of specific provisions of the Act. These will be administered via mail, with the results providing partial measure of the knowledge levels of people with disabilities who work in independent living centers. In order to gain a more accurate picture of information needs of people with disabilities in the five-state region, the instrument used with staff of independent living centers will be administered to a sample of people with disabilities in the five-state region who are not employed in independent living centers. These individuals will be identified through contacts with: (1) statewide consumer organizations, (2) rehabilitation facilities in the region, and (3) organizations in the region that provide services to people with disabilities, including but not limited to sign language interpreter services, reader services, and mental health counseling services. Results from administration of the instrument to this larger sampling of people with disabilities--in addition to staff of independent

living centers--will provide a fairly accurate measure of the information needs of people with disabilities in the five-state region.

In addition to expanding the administration of the instrument being readied for the FIR project to gauge more accurately the information needs of persons with disabilities, informational need assessments of other target populations will be completed. As regards the business community, needs assessment will be carried out under the auspices of the Better Business Bureau, with the likelihood that better responses will be obtained with their involvement than would be occur without such involvement. ILRU and the University of Texas Center for Legal and Regulatory Studies will assist the BBB in developing the instrument to be used in this needs assessment. Instrument development will not be completed until the end of month two of the project, but the types of questions to be asked of employers will include:

Are you aware of the Americans with Disabilities Act (ADA)?

Do you believe that the ADA applies to your business?

Have you received any information from law firms or other organizations about the ADA?

Have you attended any training about the ADA and what it means to you as an employer?

Have you ever had someone with a disability (handicap) apply to work in your company?

Have you ever hired anyone with a disability (handicap)?

Did you ever make changes in your facility, in the job, or in other people's jobs so that you could hire someone with a disability?

Do you believe that it has or will cost you more to hire a person with a disability?

Do you have any job openings now that you believe could be filled by a person with a disability?

If yes, please list them _____.

If you wanted more information about employing people with disabilities, whom would you contact? (A checklist with some open-ended options will be provided.)

Would you like more information about ADA and its meaning to you as an employer?

In developing the survey for employers, the Better Business Bureau and The University of Texas Center for Legal and Regulatory Studies will be relied upon heavily for guidance on length and language to be used in survey items, best approaches (i.e., mail versus telephone) for obtaining information, procedures for follow-up, and analyses of data. Both of these organizations engage regularly in data collection from employers and the larger business community and can provide expert assistance in assuring that the best possible return rate is obtained from businesses located throughout the region. It should be noted here that the BBB has more than 35,000 member businesses in the five-state region and maintains a data bank on all businesses in the region, including non-members, that can be accessed according to a variety of variables, including business type, size, and location. This data base will be used extensively in needs assessment activities carried out with employers and with commercial establishments in general.

In addition to carrying out informational need assessments with employers, informational needs of commercial establishments in general will be assessed, as will those of public and private service agencies and labor organizations. Some of these organizations will be surveyed using an approach similar to that used with business employers, with modifications in the survey formats and methods as suggested by consultants from the UT Center for Legal and Regulatory Studies and from the Center for Health Policy and Law at the University of Houston.

In addition to assessing needs relative to employment of persons with disabilities,

a sample of employers, commercial establishments, public and private service agencies, government agencies, and other organizations will be surveyed regarding awareness of ADA and its implications for accessibility by people with disabilities to their products and services. With minor modifications to accommodate particular types of organizations, these assessments will seek answers to questions like:

Are you aware of people with disabilities doing business with you?
 Has anyone with a disability ever asked you to make changes in your facilities or services so that they could do business with you?
 Have you ever made changes in your facilities or services so that a person with a disability could do business with you?
 Are you familiar with the Americans with Disabilities Act (ADA)?
 Do you believe ADA affects you in the operation of your business?
 Do you plan to make any changes in your facilities or services so that people with disabilities find it easier to do business with you?
 If you wanted more information about doing business with people with disabilities, whom would you contact?

As in the case of assessment activities with employers, project staff will rely heavily on guidance from the BBB and from faculty at The University of Texas and the University of Houston in developing survey instruments for particular audiences and in identifying the best methods for assuring a satisfactory rate of return on surveys and other information-gathering activities. These organizations have extensive experience in this type of activity and can be relied upon to assist with completing needs assessments in the most expeditious and effective manner.

Once data on needs have been collected from all target populations, analyses will be carried out by ILRU evaluation specialist, Dr. Margaret Nosek working in concert with analysts at the BBB and consultants from The University of Texas and the University of Houston. Information needs of specific target audiences will be identified based on these analyses, as will areas of ADA-related information for which available data may be inconclusive and suggestive further assessment.

This set of information needs will be used in establishing priorities for procurement of additional information for training and technical assistance and will provide guidance to staff in strengthening aspects of training for business people, people with disabilities, and others to be targeted for RDBAC activities. After year one of the project, follow-up assessments will be carried out with target populations using samples drawn from data bases maintained by ILRU, the BBB, The University of Texas Center for Legal and Regulatory Studies, and the University of Houston Center for Health Policy and Law.

Needs assessment activities to be carried out initially are:

- Examine instruments developed by ILRU staff for use in assessing the capabilities of independent living center staff to deliver ADA-related services and determine how they might be modified, if necessary, for use in assessing the ADA-related information needs of people with disabilities living in the five-state region (month 1).
- Meet with BBB staff and consultants from The University of Texas and the University of Houston to determine the best approaches for assessing ADA-related information needs of targeted audiences other than people with disabilities and assign responsibilities for preparing by the middle of month two the first draft of assessment instruments to be used with employers (end of month 1).
- Review the first draft of the assessment instrument to be used with employers, make recommendations to prepare it for pilot testing, and determine how it might be modified for use in collecting information on accessibility from commercial

establishments, service agencies, government agencies, and other covered entities (middle of month 2).

- Prepare the final draft of the assessment instrument for employers for pilot testing with at least 20 employers selected with input from the BBB (end of month 2).

- Prepare first draft(s) of other instruments for use in assessing accessibility information needs of commercial establishments, public and private agencies, and other organizations (beginning of month 3).

- Conduct pilot test of instrument for use with employers to determine clarity, completeness, utility of the information generated, and time for administration and finalize instrument for use with a larger sample of employers drawn from the five-state region to be determined according to available estimates of the total employer population and the sample size needed to attain satisfactory levels of confidence (middle of month 3).

- Pilot test final drafts of instrument(s) to be used in assessing accessibility information needs of commercial establishments, public and private agencies, and other organizations using limited samples of appropriate organizations in the five-state area selected with input from the BBB and university partners (middle of month 3).

NOTE: Decisions on whether businesses selected to participate in the employer survey should also be considered for sampling in the accessibility survey will be made in consultation with BBB staff and university consultants based on several factors, including redundancies in the information requested, length of assessment instruments, and knowledge concerning receptivity of the audiences being sampled based upon previous experience in conducting similar assessments.

- Finalize instruments to be used in assessments of information needs on accessibility based on results of pilot testing and prepare for administration to appropriately sized samples based upon estimates of the total populations of targeted organizations in the five-state area (end of month 3).

- Complete administration of instruments to assess ADA-related information needs of employers and analyze data on needs, current sources of information, and preferred information sources (middle month 4).

- Complete administration of instruments to assess ADA-related information needs of commercial establishments, public and private agencies, and other organizations relative to accessibility and analyze data on needs, current sources information, and preferred information sources (end of month 4).

- Prepare a full report on all needs assessment activities, describing how assessments were done, results obtained, and implications of the results for RDBAC activities (beginning of month 5).

- Circulate the report on needs assessment outcomes to project staff and selected consultants to determine if follow-up assessment activities or additional analyses are recommended before proceeding with development of training and technical assistance components based upon needs assessments (middle of month 5).

- Prepare an outline of the materials procurement, training, and technical assistance activities to be undertaken as a result of needs assessment activities and circulate to all project staff and key consultants (beginning of month 6).

- Conduct follow-up assessments of information needs of employers and information needs of commercial establishments and other agencies relative to accessibility

according to a schedule determined through consultation between project staff and key consultants (months to be determined, but probably in years three and five of the project).

Step 5: Develop a resource pool to support RDBAC activities.

- Modify ILRU's existing technical assistance request form for identifying independent living experts nationally to focus specifically on ADA-related areas of expertise and distribute it to all independent living centers and disability consumer groups in the five-state area to identify individuals with expertise on ADA and its provisions (month 1).
- Work with representatives of the BBB and its 31 member organizations in the five-state area to identify individuals in those cities from the fields of business, law, the media, and other fields with which BBB staff members have regular contact (months 2 and 3).
- Survey consultants from universities, government agencies, and other public and private agencies on their knowledge of individuals who have expertise in ADA and related employment and accessibility issues and follow-up through direct contacts with people recommended to determine their willingness to be identified as part of the expert consultant pool (months 2 and 3).
- Prepare an expanded listing of individuals identified as having expertise in ADA related matters, categorize as to areas of specialty (law, design, personnel management, engineering, media, education, etc.) and circulate to staff and consultants for review and requesting additional recommendations (month 4).
- Contact any additional experts identified by staff and consultants and add information on them to the listing of experts in the resource pool (month 4).
- Continue augmenting the resource pool over the duration of the project, through both contact with people assisting with RDBAC activities and through periodic resurveying of representatives of target populations (month 5 and continued periodically over the duration of the project).

NOTE: As part of its commitment to the RDBAC, the BBB has indicated its willingness to develop and assist in applying a process for applying standards to be used in screening persons who nominate themselves to be in the RDBAC resource pool. BBB has extensive experience in this type of self nomination and screening process and such an endeavor will be undertaken after the project is well underway. Determinations on timing this aspect of resource pool development will be deferred however, until time demands resulting from other RDBAC activities are better defined.

Step 6: Conduct training of individuals within the five-state region. The approach to be used with preparing people to serve as trainers and technical assistants in the five-state area is based on the notion that once a nucleus of individuals who have adequate knowledge and support has been created in a state, that nucleus can be used to expand efforts year by year while still maintaining quality control. The major concern of the project staff and primary collaborators is that quality not be sacrificed in a rush to develop a large number of trainers and technical assistants in a short period of time. Consequently, training activities have been designed to assure high quality in initial preparation of trainers and technical assistants and to allow for managed expansion of the training and technical assistance over the five-year period with the least risk of diminished quality.

The first group of trainees will come from eight sites in the region. These are Dallas, Amarillo, and McAllen in Texas; Tulsa and Norman in Oklahoma; Shreveport, Louisiana; Little Rock, Arkansas; and Santa Fe, New Mexico. Three sites were selected

in Texas because of the size of the state and the variations in demographic characteristics between these areas of the state. Two sites were chosen in Oklahoma where there are a number of independent living centers and active groups of people with disabilities who can be drawn upon for RDBAC activities. Each of the other three states has only one or two independent living centers and, as such, relatively fewer sources to draw upon in developing resource pools and assuring quality control through contacts with known staff of existing service organizations that are controlled by people with disabilities. Over the five-year project period, efforts will be devoted to developing additional resources among disability groups in all five states, but particularly in Arkansas, Louisiana, and New Mexico.

To provide balance in initial and subsequent training activities, the BBB in each of the eight sites will also be asked to identify a BBB staff person or a person from a local business that is interested in committing time to participate in training activities and to serve as a technical assistant and trainer in local activities to be conducted in later years. Both the person with a disability identified by the independent living center and the individual identified by the BBB will receive training to prepare them for their roles as primary resource persons in their respective areas. The activities for accomplishing this are summarized as follow:

- Arrange for ADA-related training to be provided by staff of the Disability Rights and Educational Defense Fund (DREDF), with support from the business consultants, and selected other experts drawn from the Houston area (month 1).
- Identify appropriate staff from an independent living center and from the business community to serve as primary resource persons within the eight initially targeted locales (month 2).
- Provide materials on ADA and its provisions and on the objectives and RDBAC activities to primary resource people in each locale (month 2).
- Make arrangements for travel to Houston by both people (one person with a disability and one business person) from each locale to participate in ADA-related training provided by DREDF and selected consultants (month 3).
- Prepare materials required for training of primary resource people and send pre-training readings and related materials to persons selected (month 4).
- Conduct a two-day training in Houston for each two-member primary resource team from the eight initial sites--see Section (a)(5), Training Needs, for a summary of topics to be covered--to prepare them to serve as technical assistants and trainers in their own locales (month 5).
- Work with members of the primary resource teams to set up two-day ADA training sessions in each of the eight regional sites--to be jointly conducted by the team in each site--with one day targeted to business people and conducted with local BBB support and the other targeted to people with disabilities and conducted with independent living center support and provide support materials to be used in training (months 6 and 7).

NOTE: Promotion of the training to the business community will be handled by the local BBB and promotion of the training to the disability community will be handled by the independent living center and ILRU so that the likelihood of the training being perceived as credible by specific target audiences will be enhanced.

- Provide staff support to each of the eight sites in conducting one two-day training session and evaluate the quality of training provided in each site based upon pre-determined evaluation criteria (months 8-11).

NOTE: It is expected that training will be offered in two sites per month, and the project coordinator and a training consultant identified by ILRU will travel to each site to assist with training and to evaluate the quality of training provided to both the business groups and the disability groups participating at each site.

- Follow-up with primary resource persons at each site to discuss the quality of training provided, value of materials used to support training, and ways in which training might be improved in subsequent offerings (months 8-12).
- Continue working with primary resource persons at each site to develop resources--material and personnel--for use in provision of technical assistance and to provide guidance on developing and marketing technical assistance to other organizations in the community (months 8 through duration).

Step 7: Assess the quality of the training program and modify as necessary.

- Contact a sampling of participants from both the business groups and disability groups participating in training programs at each site and obtain direct feedback on perceived quality of the training program, use of the information since completing the program, information needs not addressed, and additional information that would help in understanding and using and/or complying with ADA effectively (months 9-12).

- Assemble evaluation data on numbers of training participants at each site, participant evaluations, and assessments by the project coordinator and training consultant, and identify strengths and weaknesses of the training program in general (month 12).

- Revise the training curriculum used in the original eight sites in accordance with findings from evaluations of initial trainings and send the revised curriculum to the primary resource persons and selected consultants for review and comment primary to preparing copies for use (months 12 and 13).

- Continue updating and augmenting training support materials over the duration of the project as new regulations are put into effect, court rulings on ADA and its provisions begin to become available, and results of NIDRR-funded and other materials development projects begin to become available to the field (month 12 through project duration).

Step 8: Continue decentralization of the training program in the five states.

A primary intent of the proposed RDBAC is to create local ADA-resource pools throughout the five-state region. To do this, the project will use individuals from business, service agencies, and disability organizations who are identified through local training and technical assistance activities to expand the resource pool and to extend training capabilities to other areas of the five states. This will be accomplished by requiring that each of the primary resource teams who participated in training in Houston and helped to conduct trainings in their respective communities during the first year will offer trainings in at least two other communities in their state during year two. Communities targeted for year-two trainings will be places where the BBB has an office with staff who can assist in marketing the training to the business community and where there is an independent living center or well-established disability consumer group that can assist with marketing the training to the disability community.

As in year one, the project coordinator will travel to each of the training sites to assist with training and to evaluate the training quality. Depending upon the results of evaluations from year one training activities, one or more training consultants may also go to selected training programs to shore up weaknesses that may have been identified with specific training teams. In each case, the project coordinator and others doing training will be looking for at least one business person and one person with a disability from each site (32 individuals total) who have the potential to serve

as trainers and technical assistants in for future training sessions, and these individuals will be invited to attend a two-day training in Houston, similar to the one conducted in the first year, to prepare them for training and technical assistance responsibilities. Each person thus trained will be expected to participate in at least two trainings to be held the following year and will be provided with training materials and other resources to help them function as trainers/technical assistants on ADA.

In years two through five, support will be provided for additional trainings and technical assistance offerings in communities in the five-state region. However, individuals who participated in the initial Houston training group, and who subsequently served as trainers in the 16 second-year training programs and were judged to be effective in their training roles will be recruited to provide training assistance at new training sites in their states. The exact numbers of trainings to be offered in years three through five will be determined by the numbers of competent trainers to be identified and by the availability of additional resources that can be generated from business and from other sources to support training efforts. However, it is expected that a minimum of 20 training programs per year will be offered throughout the five-state region, with at least one offered in Houston or Austin to prepare 30 to 50 individuals to serve as new trainers/technical assistants in their states. Every training session will be evaluated using an assessment protocol that will be continually refined over the duration of the project, with preparation provided to trainers/technical assistants during their participation in preparatory programs in Houston or Austin.

No scheduling of activities is projected for decentralization activities in years two through five, since decisions on timings of trainings will depend on the availability of training personnel and avoidance of other major activities scheduled around those times. However, it can be assumed that one or two trainings will be offered per month in year two to allow for sufficient pre-travel preparation and post-travel evaluation time for the project coordinator. In years three through five, scheduling will be dictated more by the availability of individuals trained as resource persons in years one and two than on the availability of Houston-based project staff. Training schedules for each project year will be tentatively prepared during the last quarter of the preceding project year, with confirmation of each training to be made at least three months in advance to allow time for recruitment of people for the training and preparation and shipping of resource materials.

Step 9: Evaluate summatively the effectiveness of RDBAC efforts. Toward the end of the five-year funding period, a major effort will be undertaken to evaluate in a summative fashion the effectiveness of the training program. In addition to assembling data on numbers of training sessions conducted and numbers of participants in each training session in each state, a more outcome oriented evaluation effort will be mounted. Using data provided by training coordinators at each site, a sample of at least ten percent of business people participating in all trainings will be selected at random, as will a sample of all people with disabilities who participated in training sessions. These individuals will be contacted and asked a series of questions to try to discern to what extent the ADA-training in which they participated had impact on them. Although the exact number and wording of questions to be asked will not be determined until project year five, for employers they are likely to be of the nature of:

Are you less apprehensive about the impact of ADA on you as an employer since completing the training?

Have you made any efforts to hire people with disabilities since completing the training on ADA?

Has anyone with a disability applied for employment at your business since you completed the training?

Have you hired anyone with a disability since completing the training?

Have you made any accommodations in facilities or job duties for one or more employees with disabilities since completing the training?

Did you perceive that accommodations made for a disabled employee were too costly or created a hardship for other employees or management?

Would you hire other employees with disabilities?

Have you made modifications in your facilities or services to accommodate customers with disabilities?

Do you think that enactment of the ADA (check one):

☐ helped your business?

☐ hurt your business?

☐ had no effect on your business?

Questions asked of people with disabilities who participated in ADA training are likely to be of the following type:

Were you employed before participating in ADA training?

Were you looking for work before participating in ADA training?

Did ADA training help you to understand your rights in seeking employment?

Did you use any information obtained from the ADA training in trying to get a job?

Were you successful in getting a job after participating in ADA training?

Do you believe that information obtained from ADA training helped you get a job?

Did your employer make any accommodations to allow you to get your job or to be more productive in your job?

Have you been denied access to facilities or services in public or private businesses or agencies in your community since completing ADA training?

Did you discuss your access problem with the owner or manager of the business or agency with which you had problems?

Did you offer options for how the access problem might be resolved?

Was any effort made by the owner or manager to resolve the access problem?

Did you pursue any other course of action to resolve the problem, and if so, what course was followed and was it successful?

These are examples of the types of questions to be used with business people and people with disabilities who were participants in RDBAC activities in the five-state region. The final list will be designed for ease of administration by either mail or telephone and will be developed with input from survey experts at BBB and at universities from which consultant services have been committed. The final report of the project will include both formative evaluation results on trainings offered and indicators of enhanced capabilities to offer training and technical assistance and summative evaluation results on numbers of individuals who participated in trainings and obtained technical assistance services, and indicators of the effectiveness of such services as determined from results of surveys of samplings of business people and people with disabilities who participated in RDBAC activities.

Step 10: Maintain support for the RDBAC beyond the five-year funding period. This is an important aspect of the project in that it is designed to maintain support for essential RDBAC activities beyond the five-year federal funding period. The extent of support necessary to maintain the RDBAC beyond five years cannot be determined until later in the project period. If decentralization efforts are effective, and local resources are successfully developed in all five states, then the functional requirements of the RDBAC can be scaled back to those of a clearinghouse, providing assistance in maintaining current resources and offering occasional training. These functions will be relatively easy to maintain, and resources can undoubtedly be obtained from TIRR/ILRU, the Better Business Bureau, and local businesses and agencies to support these functions.

However, in addition, the potential for expanding the capabilities of the RDBAC in

developing and offering additional public media programs on disability, employment, and community access will also be explored, as will expanded efforts to conduct research on innovative approaches to dispute resolution and on other topics germane to ADA and its provisions. For this expansion of RDBAC activities in these areas to occur, supplemental funding will need to be secured beyond the five-year project period. Based upon ILRU's previous success in maintaining and expanding programs, it is reasonable to assume that expansion of RDBAC functions in selected areas is quite likely. Beginning early in the funding cycle for the RDBAC, efforts will be undertaken to generate additional funding from the business communities to support expansion of RDBAC activities. In addition funding will be sought from private foundations and other granting agencies in the five-state area and nationally to support aspects of the RDBAC program that are demonstrated to be particularly innovative and/or effective. It is conservatively estimated that at least half of the original funding for the RDBAC can be generated from other sources to support essential services for two to three years beyond the five-year funding period. In actual fact, it is believed that the original funding levels can be matched for a period of at least three years beyond the five-year grant period to allow for expansion of certain RDBAC components, such as new media initiatives, that are identified as important in furthering efforts toward effective ADA implementation.

This summary of activities represents an overview of the methodology to be used in developing, operating, and sustaining the RDBAC beyond the five-year period of NIDRR funding. It is intended to demonstrate to the reader that the activities of the RDBAC have been carefully considered, without suggesting that every facet of a five-year plan can be accurately predicted in an ex ante fashion, or that the proposed schedule of activities does not have the flexibility to accommodate new developments that occur over the five-year time frame. Major activities have been identified and targeted for the first project year, with the schedule of major activities for subsequent years identified on a much more tentative basis. This approach will allow for adjustments in the plan based on new developments and on the results of evaluations and reviews of the previous year's efforts.

(4) Appropriateness of Measurement Methodology and Analysis. Notwithstanding that this is a knowledge dissemination and utilization project numerous measurement activities will be carried out, with accompanying data analyses over the duration of the project. In conjunction with ILRU's field-initiated research project, measures will be made of the knowledge levels of people with disabilities concerning ADA and its provisions. Likewise, with the assistance of the Better Business Bureau's Consumer Education Foundation, measures will be made of awareness levels of ADA and its provisions by members of the business community, representatives of public and private agencies, and others.

ILRU research staff members, under the direction of Margaret Nosek, Ph.D., have extensive experience in conducting research with people who have disabilities, and will follow accepted methods for instrument development and testing, data management, and data analyses. The Consumer Education Foundation of the Better Business Bureau also has extensive experience in measurement of parameters relating to business practices. The BBB routinely surveys member and non-member businesses in communities throughout the five-state region and has an experienced staff which handles instrument development, data collection, and data analyses regularly. For purposes of quality control in measurement and data collection activities, consultant services will be available from The University of Texas Center for Legal and Regulatory Studies and from the Center for Health Policy and Law at the University of Houston.

(5) Soundness of Conceptual Model. The model for the proposed project is based on the concepts of incremental growth and quality control. As the description of the methodology --Section (c) (3)--indicates, activities over the five-year project period will build in quantity and frequency. The rationale for this approach is based on the

principle that the quality of knowledge dissemination and information utilization efforts is the critical factor in determining the success of ADA implementation efforts. As such, the proposed model has been constructed in a manner that allows careful management of all aspects of the project and growth of activities in a manner that minimizes the likelihood of diminished quality in project efforts at all stages.

(6) Appropriateness of Sample Populations. Although this is not a research or development/demonstration project, careful attention will be given to sample populations used in needs assessments training programs, and in subsequent follow-up activities. Care will be taken to assure that individuals with disabilities who participate in activities represent people with various types of disabilities (e.g., mobility impairment, sensory impairment, cognitive impairment), various educational and socioeconomic levels, and various population base categories (e.g., urban, suburban, rural). Because of ILRU's extensive contacts with disability consumer groups throughout the five-state region, it will be possible to recruit individuals with a wide range of characteristics. Obtaining appropriate representation of people with disabilities in samples used for needs assessments and other activities is not expected to pose major difficulties.

By the same token, the BBB has data on virtually all businesses, including its 35,000 member businesses in the five-state area. It can retrieve data from its data bank according to a variety of parameters, ranging from city size, to numbers of employees, to business type. The ability to identify and to access businesses according to specific descriptive parameters is one of the major strengths of the proposed RDBAC, and it helps to assure that proper sampling of the employer/business community can be successfully carried out in needs assessment and other RDBAC activities. As with other aspects of data collection and analyses, expert consultation on sampling will be available from experts at The University of Texas and the University of Houston who have agreed to participate in RDBAC activities.

(7) Protection of Human Subjects. Protection of human subjects will be assured in all aspects of this project. The grantee institution, TIRR, is a clinical affiliate of Baylor College of Medicine, and all research-related activities of the proposed project will be subject to review and approval by the TIRR Research Committee and by the Baylor Institutional Review Board. In every case, steps will be taken to assure anonymity of people providing information used in needs assessment or other activities of the RDBAC, and no data will be reported in a manner that allows for identification of individuals or organizations participating in research or training components of the RDBAC.

(8) Appropriateness of Environment for Model System Development. As a knowledge dissemination and utilization project, most of the model development will occur in standard office environments, with appropriate hardware and software support for needs assessment and training development activities. Actual training activities will occur most often in traditional classroom settings, where information will be presented and discussed and examples offered. No specialized environments are required for development of the proposed RDBAC and its component activities, and developmental efforts will be carried out in a number of locations, including offices of ILRU and the BBB and the facilities of university-based collaborators in this project.

(9) Comprehensiveness and Appropriateness of Training Content. The training content to be covered through this project has been referred to in some detail in Section (a)(5), Training Needs. Most obviously the training content will cover specifics on the Titles I through V of ADA. These are summarized in an attachment to this proposal. Core topics to be covered in all RDBAC training activities include: intent of the legislation; entities covered by the legislation; time frames for implementation of various provisions; specific requirements for compliance with ADA provisions by employers, public and private service agencies, governmental bodies, and

others; and options for resolving disputes that may arise relative to ADA and its provisions.

In addition to this core content on ADA, a substantial portion of the training will be devoted to increasing awareness of both of the primary target audiences--members of the business community and people with disabilities--of the concerns and constraints of the other group. In this regard, business people will be presented with content on the life situations of individuals with disabilities who have options for work, recreation, and other forms of community involvement. People with disabilities will be presented with content on fiscal constraints under which businesses operate; concerns of employers regarding perceptions, whether accurate or inaccurate, of higher costs of health insurance, workers compensation insurance, and making accommodations for people with disabilities; and external influences, such as a recessionary economy, that may influence employers to be less willing to take what may be perceived as risks in hiring people with disabilities.

These awareness-heightening presentations will serve as lead-in training for presentations on options available to the employer and employee in making reasonable accommodation for various types of disabilities and on sources of technical and financial assistance. This portion of the training will then be extended to negotiating skills for the employer and potential employee with a disability who is seeking employment. The focus of this portion will differ somewhat for employers versus people with disabilities who are potential employees. The employer component will cover what can and cannot be asked by an employer in a job interview and methods for evaluating applicant job skills that do not discriminate against people with disabilities. It will also be geared toward working with the new employee with a disability to identify accurately any functional limitations that may require accommodation so that the employee can perform his or her job at maximum efficiency, thereby avoiding problems associated with initial poor job performance that may be difficult for the employee to overcome. Finally, employer training will cover good practices in management of all employees, including those who have disabilities, and methods for dispute resolution that can be used to minimize the likelihood of costly resolution through formal legal proceedings. The area of alternate dispute resolution techniques is one in which both BBB staff and university-based consultants have considerable expertise, and these approaches will be emphasized to both employer and disability training groups.

Trainings targeted to people with disabilities will also focus on developing negotiating skills for dealing both with potential employers and with businesses and community agencies on issues of accessibility. The major thrust of this portion of the training will be on developing the staged approach discussed earlier to addressing perceived discriminatory practices in the workplace and in other settings. The major emphasis of this training will be to encourage people with disabilities to pursue problems relating to discrimination through the least costly and least confrontational pathways initially and to escalate to higher pressure tactics only when negotiations appear to have stalled and to have little likelihood of being reinitiated. This approach has the benefit not only of reducing opportunities for negative backlash from the business community, but also of allowing the conservation of resources, including both money and energy, to tackle the most intractable problems relating to disability-based discrimination.

Training offered in Houston or Austin each year will focus on preparing local area resource persons. This component of the training program will be targeted to individuals identified as having good interpersonal skills and enthusiasm for serving as trainers and resource persons in their local areas. In the first year, 16 people (eight business people and eight people with disabilities) will participate in this training and at least 32 individuals in each year thereafter. During the two-day training program, two-person teams from each site targeted for the year will have

opportunities to observe experienced trainers presenting on ADA, to make presentations themselves, and to practice using different instructional techniques, including small and large group discussions, role playing--with business people and people with disabilities exchanging roles, and case study exercises. In addition, these individuals will be provided basic information on establishing a technical assistance program, including ways of identifying resource personnel, setting up resource files using either electronic or manual systems, maintaining service files, and following up on technical assistance requests.

Following the Houston or Austin training sessions, local resource people will have opportunities to apply their learning by assuming responsibility for organizing and offering ADA-related training programs in their communities. They will be supported in these efforts by project staff at ILRU, and the project coordinator and a training consultant will travel to work with new training teams at least twice before the teams are allowed to conduct training on their own. It should be noted that trainings offered by the training teams in the target communities will be offered in two-day formats, with one day for business people and one day for people with disabilities, with instruction to both groups provided by the team composed of the business person and the person with a disability. This separation of the training program will be done at least initially to increase the likelihood of attracting target audiences--the business component will be promoted by the BBB using its recognition in the business community and the disability component will be promoted by the independent living center or disability consumer groups using its recognition in the disability community. It is also intended to diminish opportunities for confrontational types of exchanges that are likely to occur when groups with what some consider to be opposing agendas get together in settings where control cannot be assured. With the mission of the RDBAC being to foster cooperation between the business and disability communities, confrontational types of exchanges might have a significant negative impact. In later years of the project, as both the business community and the disability community become more familiar and comfortable with ADA and its implications for them, different training formats will be tried and evaluated to determine if they are effective in fostering positive change.

(10) Effectiveness of Training Methods. The training methods have been alluded to in the previous section, and include providing pre-training readings/audiotapes, lectures, small and large group discussions, role playing, and case studies. As mentioned under Section (b) on Dissemination/Utilization, ILRU has pioneered the use of innovative training methods, including use of simulation methodology, in programs developed and refined over the last ten years, and has, for the past six years, offered a series of training programs for managers of independent living centers that draw consistently high praise from participants. It will, throughout this project, explore the best mix of training methods for use in presenting various topics to target audiences and will refine training activities based upon evaluation results from participants and data obtained from the array of evaluation activities to be carried out with this program. It is premature at this point to indicate the precise mix of methods to be employed in training activities, but, with the experience of ILRU and its collaborating partners, it is certain that a variety of training methods will be explored and best approaches for providing training will be identified and disseminated to appropriate audiences.

(11) Quality and Uniqueness of New Materials. It should be pointed out that the focus of this project is not development of new materials. There is a large volume of ADA-related informational and instructional materials already available, and this volume will continue to increase as results from NIDRR-funded materials development projects and other sources become available. Project staff have made a deliberate decision to secure and work with existing or soon-to-be-available materials to the greatest extent possible. A major effort will be devoted to securing, applying, and evaluating training and technical assistance materials available from other sources and

providing feedback to the developers and to the field on the efficacy of such applications and the identified strengths and weaknesses of materials used with particular audiences in addressing specific needs.

One exception to this avoidance of materials development activities relates to plans by the BBB in Austin to develop a set of ten three-minute audio tapes on the ten questions most often asked by business people regarding ADA. These will be developed for access through BBB's toll-free 800 Tele Tips line. This materials development activity is intended to provide business people with ready access to commonly requested ADA information and for use in recruiting business people into RDBAC activities. The tape series will be evaluated through follow-up inquiries with users and through external evaluations by consultants on accuracy, clarity, and utility of the information. Also, new materials, mostly of a case study nature using hypothetical scenarios, may be developed and evaluated, but materials development is not a major thrust of this project.

(12) Linking Target Populations to the Project. In addition to direct contact with people in the business field and disability field by BBB and ILRU staff people, respectively, the two primary collaborators have a number of mechanisms for linking with target audiences. ILRU distributes a bi-monthly newsletter, ILRU Insights, to disability organizations throughout the region and uses the newsletter very successfully to enlist cooperation in research, training, and technical assistance projects. ILRU also distributes periodic direct mailings to hundreds of disability service and advocacy organizations and participates in the SERIES national computer network serving rehabilitation and independent living service providers with a variety of features, including bulletin boards, electronic mail, and event calendars. ILRU offers a comprehensive technical assistance program focusing on consumer-controlled service and advocacy resources and distributes more than 13,000 informational items per year to disability organizations. It also provides direct training to independent living personnel each year, and uses training opportunities to enlist participation in other activities. As mentioned earlier, ILRU also has a grant from The Robert Wood Johnson Foundation that includes funding for a national media campaign that is just getting underway. The resources available through this media campaign will provide a valuable resource in effectively linking with target populations of people with disabilities throughout the region.

The BBB likewise has extensive methods for linking with businesses throughout the region. It communicates with its offices and members regularly through direct mailings, telephone technical assistance, and sponsorship of training programs. It also markets its services to more than 700,000 other businesses in the region and operates a toll-free number that business people in Texas can call to get information about a variety of topics. As part of this project, the toll free number will be expanded to the other four states, and a special feature on ADA and RDBAC will be added to the touch-tone accessible menu. This represents an important component in expanding linkages with businesses in the region.

The letters of collaboration attached to this proposal attest to the willingness of individuals and organizations not simply to be supportive of the RDBAC, but to be active participants in RDBAC programs and activities. A strength of the RDBAC is its existing linkages and potential for substantial expansion of these linkages.

(13) Appropriateness of Dissemination Format in Achieving Results. Both ILRU and the BBB have strong backgrounds in creating and distributing information in formats that are appropriate to the audiences and effective in conveying the message. As previously mentioned, ILRU's primary dissemination methods have focused on low-technology print media and audio cassettes that can be accessed easily by people--like many consumers with disabilities and staff of small community-based service agencies--who do not have expensive hardware such as videotape players and computers. However,

ILRU also has the capability to produce material on computer diskette and on videotape, using production capabilities of TIRR and Baylor College of Medicine, an academic affiliate. Most importantly it is familiar with accessibility requirements of people with disabilities and can have materials prepared in Braille or large print as well as audiotape. Access to training programs is also provided through provision of sign language interpreters and audio looping for hearing impaired persons and by arrangement for provision of personal assistance services for people requiring such in order to attend training. All formats and special assistance needs will be considered in developing the training and technical assistance capabilities of the RDBAC, and choices will be dictated by results of needs assessments, as well as by costs and recommendations by consultants.

BBB's experience with dissemination to business communities throughout the region has, likewise been tailored to community needs. Although using a somewhat higher technology approach than ILRU, BBB has concentrated on cost effective dissemination methods, such as the toll free number, which afford easy access by a large target population at relatively low cost. BBB's access to dissemination methods targeted to the business community through direct mail, telephone dispensed assistance, face-to-face training, audiovisual programs, and extensive contacts with the media help to assure success of RDBAC activities.

(d) Probability of Achieving Proposed Outcomes: Key Personnel

(1) Training and Experience of Project Director and Key Staff. Lex Frieden, M.A., will serve as project director with primary responsibility for planning and coordination of project activities. Frieden is currently staff associate of ILRU as well as senior vice president of TIRR. He is also director of an ILRU national project funded through The Robert Wood Johnson Foundation, entitled "Improving Service Systems for Persons with Disabilities!" He was previously executive director of the National Council on the Handicapped (now the National Council on Disability, NCD), and it was under his leadership that NCD drafted the original ADA legislation. Frieden was significantly involved in promoting passage of ADA and is considered an expert on ADA and its provisions.

Wendy Wilkinson, J.D. will serve as project coordinator. Wilkinson is a graduate of the Florida State University College of Law and will be joining the ILRU staff in the near future. In addition to experience as a practicing lawyer, and her personal experience with disability (spinal cord injury), she has worked in the field of independent living and is very knowledgeable concerning issues of disability rights and the legal nuances of ADA and its provisions.

Laurie Gerken will serve as technical assistance specialist. Gerken is ILRU director of technical assistance and is also project director of ILRU's RSA-funded special project to develop and evaluate the feasibility of neighborhood-based independent living services targeted to black and Hispanic persons with disabilities. She was previously director of an RSA-funded project on delivery of independent living services in rural areas. She has personal experience with disability (spinal cord injury).

Laurel Richards will serve as training specialist for the project. Richards is ILRU director of training and is project director of ILRU's RSA-funded long-term management training program for upper-level managers of independent living centers. She is also editor of ILRU Insights and serves as editor of all monographs and special reports produced by ILRU. In addition, Richards has authored numerous monographs, articles, and book chapters on independent living.

Margaret Nosek, Ph.D., will serve as evaluation specialist. Nosek is ILRU director of research and is an assistant professor of physical medicine and rehabilitation at

Baylor College of Medicine. She has had principal responsibility for developing and maintaining ILRU's extensive data base on independent living centers and is very experienced in questionnaire development and administration. Her experience as technical assistance coordinator for the Southern Region 504 Training Project in the early 1980's offers valuable background for the planning, execution, and evaluation of the RDBAC. She was substantively involved in drafting ADA and in guiding its passage through Congress. She has personal experience with disability (spinal muscular atrophy).

Quentin Smith will serve as management resource specialist of the project. Smith is currently co-director of ILRU's long-term management training project. In addition to having served as the executive director of the Houston Center for Independent Living, Smith co-authored with ILRU research director Peg Nosek On the Right Track: Foundations for Operating an Independent Living Program, which provides basic management guidance to individuals and groups in establishing and operating an independent living service delivery organization. Smith is very experienced in synthesizing knowledge of specialized topics for use with different audiences and has authored numerous topical monographs for the field of independent living and on various health and educational topics.

Yilin I. Zhu, M.P.H. will serve as data management specialist. She is currently a research assistant at the ILRU Research and Training Center on Independent Living and has primary responsibility for developing and maintaining the ILRU National Database of Independent Living Programs, and providing support and technical assistance to various ILRU projects in the area of statistical analysis. A member of ILRU since 1986, Zhu is quadriplegic as a result of a spinal cord injury. Zhu has an M.P.H. in biostatistics from the University of Texas School of Public Health in Houston.

(2) Familiarity With the Literature. ILRU staff have been working and writing in the area of disability rights for more than 13 years and are intimately familiar with the literature. This is demonstrated by frequent citations in disability rights literature, in ILRU publications, and the writings of staff published in various sources (see biosketches). Further evidence of this familiarity is a brief review of literature on ADA attached as an appendix to this proposal.

(3) Involvement of Required Disciplines. The proposed project has been designed to assure substantive involvement of people from all disciplines identified as important to the success of the project. Most importantly, it involves people from the disability-service field and disability-rights movement and people from the business sector. The project director, project coordinator, technical assistance specialist, and research specialist are all well known for their contributions to disability service development and the disability rights movement. In addition, they represent the academic disciplines of psychology, law, and rehabilitation counseling. The field of business is represented through staff of the BBB and through resource persons whom they have identified to participate in the project and listed in an attachment to this proposal. Additional disciplines represented by individuals who have agreed to serve in consultant and/or resource pool roles include: physical engineering, rehabilitation engineering, architecture, state government, city government, broadcast media, public policy, economics, accounting, management analysis, and public education.

(4) Commitments of Staff Time to the Project

Lex Frieden	25%	Margaret Nosek, Ph.D.	10%
Project Director		Evaluation Specialist	
Wendy Wilkinson	100%	Laurel Richards	15%
Project Coordinator		Training Specialist	

Laurie Gerken 20%
Technical Assistance Specialist

Quentin Smith 10%
Resource Materials Specialist

Project Secretary 75%

(5) Involvement of Persons Who Have Been Traditionally Underrepresented. Of the seven project staff currently identified, five have severe disabilities, five are women, and one is Asian. Consideration will be given in all project activities, including advisory functions, consultation work, and employment, to selecting qualified representatives of traditionally underrepresented groups such as members of racial and ethnic minority groups, women, disabled persons, and elderly persons. Equal access for members of traditionally underrepresented groups is assured for all project programs and activities, and affirmative action will be taken to recruit members of these groups as project participants and employees.

(e) Probability of Achieving Proposed Outcomes: Evaluation Plan

(1) Mechanism for Evaluating Plans, Progress, and Results. The evaluation plan for this project is multifaceted and is designed to assure that all aspects of project operation come under close scrutiny. Responsibility for overseeing evaluation activities of the project will rest with Margaret Nosek, Ph.D., ILRU director of research, who has extensive experience in both applied research and project evaluation and Laurel Richards, director of training. Nosek and Richards will work with the project director and project coordinator in preparing an evaluation process including the following:

- collection of baseline data on knowledge levels of a sample of people with disabilities regarding ADA, sources of information from which ADA-related information was obtained, and areas of interest regarding ADA and its provisions;
- collection of baseline data from a sample of people from the business community (accessed with assistance from the BBB) on awareness of ADA and its provisions, sources of information about ADA, and preferred conduits for additional information on ADA;
- identification of ADA-related resource materials currently available to disability service providers and members of the business community;
- collection of baseline data on knowledge levels, sources of information, and self-perceived knowledge deficiencies of all persons with disabilities, business people, and others participating in RDBAC training on ADA;
- post-training data on people participating in ILRU training on ADA for use in assessing training effectiveness with baseline data;
- participant evaluation data, indicating perceived clarity, quality, and utility of the information; knowledge level of training faculty; quality of supporting resources and materials; and overall quality of the training;
- follow-up data collection with a sample of at least ten percent of all people (including both business people and people with disabilities) annually who participate in ADA-training programs and technical assistance activities coordinated through the RDBAC to determine if the training or technical assistance was of value, if the information was used by the individual, whether use of the information produced desired results, and other information that might be helpful to the individual;
- collection of data on numbers of people with whom resource people engaged in training (along with dates, locations, and durations of training sessions) and to whom technical assistance was provided (along with topical areas for technical assistance

and topics on which resource people were not prepared to answer);

- follow-up data collection with all trainers and technical assistants who receive preparation through the program to determine if they perceive that their preparation was adequate for the role in which they are serving, what areas they perceive as being most important for additional training on ADA and its provisions, and methods for using ADA-related knowledge effectively; and

- final-year follow-up data collection with at least ten percent of business people and ten percent of people with disabilities who participated in the program to determine what they perceive to be the impact of their participation in the program in terms of increased opportunity in the community for people with disabilities and, for employers/business people, changes in attitude or behaviors toward people with disabilities who are seeking employment, products, or services through the place of business.

(2) Likelihood of Producing Quantifiable Results. As the above summary of evaluation activities indicates, a large amount of quantifiable data will be produced from this project. Data on ADA-related knowledge levels and information needs of individuals with disabilities and business people will be quantifiable and subject to comparison with post-intervention follow-up data. Data on numbers of training sessions held to prepare resource people and numbers of people with specific characteristics (e.g., representing types of disabilities, representing different business organizations) will be collected. Pre- and post-test results from training programs will be gathered. Numbers and types of technical assistance requests handled by project staff at ILRU and at BBB, as well as by individuals prepared to serve as local resource people in the five-state area will be reported. Numbers of trainings provided by people prepared to serve as local resource persons will be reported, attendance figures and demographic data on people participating in trainings carried out in the five-state area.

Finally, and perhaps most importantly, the summative follow-up to be carried out in the final project year will provide a quantitative estimate of the impact that the project has had on people with disabilities and people operating businesses serving communities where RDBAC activities were held. This last quantitative measure is most important because it will indicate if RDBAC efforts have produced positive results with regard to the status of people with disabilities living in the five-state area, and it will provide the best indication of the task remaining before us in terms of making ADA a piece of legislation that truly opens the doors to community participation for people with disabilities living in the targeted five-state area.

(3) Likelihood of Evaluation Results Being Assessed in Service Settings. Because of the involvement of staff of independent living centers, there is a very high likelihood that evaluation results will be assessed in a service setting. It is expected that most of participants with disabilities will be staff of independent living centers, and that technical assistance and training services to be offered by local resource people will be done under the auspices and with the support of the independent living centers. One aspect of the evaluation that has not been mentioned heretofore is the question of how the strengthening of ADA-related service skills of center staff influences the center and its operations. It is expected that an important by-product of this program will be increased numbers of contacts between people with disabilities living in communities targeted for center staff training and increased contacts between center staff and business representatives, service agency personnel, government agency staff, and others in these communities. This is viewed as a positive outcome of the project in that it may open doors for development of fee-for-service programs, greater involvement with business in securing corporate support, and opportunities for improved relationships with community leaders who may assist centers with securing support for programmatic activities targeted to improving the

quality of life for people with disabilities. Follow-up interviews with executive directors and other staff of centers participating in the project will be conducted yearly and at the end of the five-year project period to determine what the impact of the project has been on delivery of services through independent living centers.

(f) Program/Project Management: Plan of Operation

(1) Insuring Proper and Efficient Administration. The proposed RDBAC has been developed to take advantage of an administrative structure that has been used effectively in managing numerous similar projects carried out by ILRU over the past 13 years. The structure draws upon strengths of key staff and selected advisors and consultants in addressing specific responsibilities essential to effective operation of the RDBAC. The administrative structure to be used for the RDBAC calls for general oversight of all aspects of RDBAC operations by an advisory committee composed of representatives of business, universities, independent living centers, rehabilitation organizations, and consumer organizations (see appendix for list).

The advisory committee will be responsible for reviewing all RDBAC plans and for recommending strategies for improving processes and outcome of RDBAC activities. The advisory committee will also review evaluation data and narrative descriptions of project outcomes and make recommendations for improving outcomes of future RDBAC efforts. It will help to identify resource people from a variety of fields and locations willing to serve as members of the resource pool being developed for the project, and who can be called upon as consultants to work on specific problems on an ad hoc basis. The advisory committee as a whole will be convened once each year via teleconference after having been provided with summary information on project plans and the most current evaluation data. The teleconference approach is being used as a means of conserving funds that would be spent on travel if in-person advisory committee meetings were used. ILRU has extensive experience in successfully using the teleconferencing approach with advisory committee meetings.

The advisory committee will communicate directly with the project director, Lex Frieden, who will have overall responsibility for project management, including oversight of project staff and primary contracting and consulting partners, direct supervision of the project coordinator, monitoring of project progress, adherence to sound fiscal management practices, and submission of project reports. Frieden will meet on a weekly basis with the project coordinator to be sure that day-to-day work remains on schedule, monthly with the full RDBAC staff at ILRU, and as needed with contractors or consultants working on specific aspects of RDBAC programs.

A project coordinator, Wendy Wilkinson, J.D., will have primary responsibility for day-to-day work to be carried out through the RDBAC. She will be responsible for overseeing the work of support staff, for working with staff at the BBB on a regular basis, and for dealing with consultants and resource persons on routine activities of the RDBAC. It will be her responsibility to assure that appropriate reviews of ADA-related materials are carried out by qualified individuals, arrange for training programs in Houston and other sites, communicate with consultants and contractors on training and technical assistance activities, provide on-site support for training activities, assist with collection of evaluation data, and draft project reports and other communication for the project director. Wilkinson will be the primary full-time staff person on this project.

Yilin Zhu, M.P.H., will serve as half-time data management specialist on the project, with responsibility for assisting the project coordinator and evaluation specialist with completing the needs assessment, and with establishing and maintaining data files on the full range of project activities. Zhu will be responsible for assisting with instrument development, setting up a management information system, overseeing the mailing of survey instruments, entering survey data and results from

other evaluation activities in computer storage, carrying out data analyses, and assisting with provision of technical assistance on ADA.

The major responsibility of overseeing establishment of ADA technical assistance capabilities will fall to Laurie Gerken, ILRU's director of technical assistance. She will supervise development of instruments for collecting data on personnel and resources for technical assistance, prepare formats for saving and disseminating technical assistance information, oversee support staff involved in operating the technical assistance system, and deal with specific technical assistance issues relating to ADA and its provisions. She will devote 20 percent time and effort to the project.

Oversight of training activities will be provided by Laurel Richards, ILRU's director of training. Richards will be responsible for providing expert guidance director in planning and offering training programs, assisting with preparation of materials to be used in training programs, preparing evaluation instruments to be used with training activities, and participating in parts of the training program. Richards will devote 15 percent time and effort to the project.

Supervision of RDBAC evaluation activities will be the responsibility of Margaret Nosek, Ph.D., ILRU director of research. Nosek will direct development of the overall evaluation protocol to be used, supervise preparation of data collection instruments for needs assessment and other non-training evaluation activities, oversee data analyses and interpretation of findings, and review drafts of project reports for correctness in presentation of evaluation findings and their implications vis-a-vis ADA implementation. She will devote 10 percent time and effort to the project, with five percent provided as in-kind support.

Quentin Smith, M.S., ILRU staff associate, will serve as resource materials specialist for the project, with responsibility for identifying resources for use in RDBAC activities and for assisting with development or adaptation of resources for use in training and technical assistance. Smith currently provides similar services for other projects of ILRU, particularly in the area of management training. He will devote ten percent of his time and effort to the project, with five percent provided as in-kind support.

The proposed management plan assures that people with specific expertise are assigned responsibilities that capitalize on that expertise and that no one individual is assigned greater responsibility than they can manage effectively. ILRU has been using this ensemble approach to project management for more than ten years and has refined it to a very efficient means of operation. This management structure, in tandem with effective use of contractors and consultants as described in section (3), Effectiveness of Proposed Collaborations, below will assure that the RDBAC produces expected results.

(2) Plan for Using Resources and Personnel in Achieving Objectives. The plan for using resources and personnel in achieving objectives is discussed in great detail under Section (c)(3) Project Design and Methodology in Meeting Objectives and in other sections of this proposal, including Section (b), Dissemination/Utilization, and Section (e) Evaluation Plan, and in the interest of brevity, the reader is referred to those sections for details on work to be carried out through the RDBAC. However, it should be emphasized that the plan for using resources and personnel in achieving the objectives of this very ambitious project is feasible only because it draws upon the extensive resources of related ILRU projects, including the field-initiated research project on assessing independent living staff capabilities for delivering ADA-related services and The Robert Wood Johnson Foundation-funded project on Improving Service Systems For People With Disabilities. These and other ILRU projects represent important resources to support the RDBAC, and they will be used judiciously in

developing and operating an effective Regional Center.

(3) Effectiveness of Proposed Collaborations. A number of important collaborative relationships have been proposed for the RDBAC. First and foremost is the collaboration with the Consumer Education Foundation of the Better Business Bureau (BBB), located in Austin. This collaboration is crucial in that it provides access to offices and members located throughout the five-state area and that can be tapped for resources and can serve as targets for training and technical assistance activities. The BBB also has an extensive data base on all other businesses in the area that can be accessed categorically to target businesses of specific sizes and types. This type of access to business organizations is an extremely strong component of the proposed RDBAC.

In addition to their assistance in working with member businesses and in accessing other businesses throughout the region, the BBB will also be providing a number of valuable services to the RDBAC. These include direct participation of Mr. Gary Smith, program director of the Consumer Education Foundation, in training activities, his oversight of development of the BBB's ADA-related technical assistance for businesses, and access to the BBB's toll-free number for providing ADA-related information. In addition to the services offered by the BBB through a contractual arrangement to be executed upon notification of a grant award, BBB will provide substantial services as an in-kind contribution to the project. These include: the time of its president and chief executive officer, Mr. John Etchieson, estimated at more than \$11,000 in value; printing and production services for brochures and mailouts estimated at a value of \$12,000 for the Austin Office alone and at an additional \$26,000 for the combined contributions of the other 31 offices region-wide; and production of ten informational audiotapes on ADA that will be accessed through the toll-free number using a touch-tone activated menu. The BBB's participation in this project substantially increases the likelihood the effective linkages between the disability community and the business community will be established, and lends credibility to the RDBAC's outreach efforts to businesses.

Two other very significant collaborations have been established for the proposed RDBAC. These are with the Center for Legal and Regulatory Studies at the University of Texas Graduate School of Business and the Center for Health Law and Policy at the University of Houston. These two groups will be very important in development of needs assessment instruments and methods, making contacts with business leaders and policy makers in the area, and providing support for training and technical assistance activities. Dr. James Jarrett, with The University of Texas and Dr. Mark Rothstein, of the University of Houston were both enthusiastic supporters of this project and both contributed substantively to conceptualizing the RDBAC structure and process and in enlisting support of key resource personnel from throughout the region. An important aspect of Dr. Jarrett's contribution involved enlisting the participation of Mr. Jorge Anchondo, who will work with RDBAC staff in preparing training and technical assistance materials in Spanish for use by persons from the large Hispanic population in this region of the country. Mr. Anchondo is a faculty member with the Center for Legal and Regulatory Studies with responsibility for outreach to Spanish-speaking populations, and among his experiences in public service, is a year-long assignment with the regional office of the U.S. Civil Rights Commission. The continued support of these consultants will help to assure that qualified assistance is available for various aspects of the project and that resource capabilities continue to grow over the duration of the project.

In addition to these major consultation agreements, numerous other individuals representing a broad range of organizations have agreed to participate in a wide variety of activities, ranging from assisting with training and technical assistance to serving as local resource people to expand the capabilities of the RDBAC in effectively implementing ADA provisions throughout the region. Because of the large number of

individuals who have agreed to participate, letters of collaboration are included with the appendices to this application.

(4) Inclusion of Persons Who Have Been Traditionally Underrepresented. Persons who have been traditionally underrepresented in many areas of work and community participation will be heavily represented in the proposed project. It should be noted that, of seven key staff on the proposed project, five are people with severe disabilities, five are women, and one is Asian. In addition, more than half of the people serving on the advisory board will be people with severe disabilities, and people involved in project activities in all sites within and outside of Houston will be selected with a conscious effort to encourage participation by people from racial and ethnic minority groups, women, people with disabilities, and older individuals. TIRR is an equal opportunity employer with a strong commitment to affirmative action, and it will apply these commitments to the proposed project.

(g) Program/Project Management: Adequacy of Resources

(1) Facilities. Since its establishment in 1977 as a national research utilization program, ILRU has established a reputation as one of the foremost leaders in research, training, and technical assistance in the field of independent living. ILRU is located approximately four miles from the main TIRR campus in full accessible office space.

(2) Equipment and Supplies. At present, ILRU has IBM compatible computers, both dot matrix and laser printers, and software programs to support word processing, desktop publishing, statistical data analyses, computer networking, and financial spreadsheet functions. It has modem capabilities for communication with computerized networks and participation in computer bulletin boards. It also has fax capabilities for rapid turnaround of information. Photocopying and other support services are available at ILRU. ILRU staff also have access to TIRR data processing hardware and software and access to the Texas Medical Center Library, one of the largest collections of health care and disability-related texts and periodicals in the world.

(3) Administrative Support. The administration of TIRR is firm in its support of this proposal as evidenced by the involvement of senior level personnel on a no-cost basis; the in-kind contributions of senior project staff including Frieden, Nosek, and Smith; the substantial commitment of equipment and supporting software; and most importantly, the acceptance of an indirect cost rate substantially below that which was negotiated and could have been charged against this project. Furthermore, the distribution of responsibilities proposed for this project assures that resources will be used effectively to achieve optimal results from project efforts.

(h) Program/Project Management: Budget and Cost Effectiveness

(1) Adequacy of Budget to Support Activities. Reviewers are referred to the budget and budget justification for information on the reasonableness of the budget. It should be emphasized that the proposed budget is extremely tight in light of the ambitious project activities outlined for the RDBAC. However, because of currently funded projects that will complement the activities proposed for the RDBAC and the significant in-kind contributions of TIRR, the BBB, and other collaborating partners, the budget will be adequate to complete the work outlined in this application.

(2) Reasonableness of Costs in Relation to Project Objectives. Costs are extremely reasonable in light of the proposed objectives. As stated in the previous paragraph, this project could not be undertaken without substantial in-kind support from collaborating organizations, and this in-kind support is the key factor in keeping project cost levels at the extremely reasonable levels indicated.

(3) Appropriateness of Budgeted Subcontracts. The budgeted subcontract with the

BBB is extremely appropriate in light of their critical role in accessing the business community and in assisting with developing and offering essential components, including provision of training and technical assistance to the business communities in the five-state region. BBB's willingness to participate as a major partner in this project for comparatively little cost is a strength of the proposed RDBAC.

(i) Additional Selection Criteria

(1) Delivering Technical Assistance and Training to Target Audiences. The capacities of the two major partners--ILRU and the BBB--in delivering technical assistance to the primary target audiences of people with disabilities and people in the business community can be documented in a variety of ways. ILRU is one of the best recognized organizations in the country with respect to issues of disability and independent living. It includes technical assistance as one of three major divisions, along with research and training, and provides thousands of technical assistance services to disability service and advocacy groups and to consumer organizations every year. In addition to an average of 25 technical assistance requests handled per day, ILRU distributed more than 13,000 pieces of printed material upon request each year for the past four years. ILRU's ability to deliver technical assistance services is well established and will be further strengthened through the activities of the proposed RDBAC.

BBB, likewise, is well established as a provider of technical assistance services to both the consumer and business communities. With its toll-free number, it responded to nearly 31,000 calls for technical assistance in 1990 and sent out more than 3,600 brochures. It reviews advertising and selling practices of businesses and advises them on adherence to ethical, truthful, and accurate advertising and selling practices that are in the best interests of both the business and the general public. The BBB is well established as a source of high quality information and brings an important perspective to the proposed RDBAC.

Other collaborating institutions, such as The University of Texas Center for Legal and Regulatory Studies in the Graduate School of Business and the Center for Health Law and Policy at the University of Houston, also contribute to the RDBAC's abilities to deliver technical assistance services to selected audiences, particularly the organizations involved in public policy decisions and governmental bodies. These additional linkages, and the involvement of consultants from a variety of other fields assure that technical assistance linkages can be established and maintained with all targeted groups. The training capability of ILRU and its collaborators has been discussed in detail earlier. Reviewers are referred to Section (a) (6) and Section (b).

(2) Reaching the Range of Covered Entities in a Timely Manner. The collaborations discussed above, when taken in concert with ILRU's existing close connections to the disability communities throughout the region, and the fact that at the start of the grant period all staff will be in place, assure that covered entities within the region can be reached virtually immediately. Upon receipt of a notification of award, covered entities within the five-state region will be notified of the RDBAC and its purposes and will be informed about how to access services by phone or mail and will be provided with an overview of activities to be carried out by the RDBAC in the first year. Thereafter, contact with covered entities will be maintained at least monthly through special mail-outs and telephone contacts and linkages through collaborating consultants. Reaching covered entities in a timely manner poses absolutely no problems for the partners in the proposed RDBAC.

(3) Collaborations: People with Disabilities and Covered Entities. ILRU has a long history of collaborations with organizations serving and representing people with disabilities in the five-state region. As the attached letters of cooperation and

collaboration suggest, ILRU's relationships with disability-related organizations are very strong and positive and insure the active involvement of many people with disabilities who have knowledge of the ADA and its provisions--in addition to the project director, Lex Frieden, who directed the drafting of the ADA legislation while executive director of the National Council on Disability in Washington, D.C. Collaborations with a wide range of professionals from the fields of law, public policy, education, research, transportation, engineering, architecture, and others also assure that individuals knowledgeable about ADA and its provisions and representing groups and associations of covered entities will be readily available to assist with RDBAC activities. Evidence of these collaborative relationships is provided in the letters of cooperation and collaboration attached to this proposal.

Sincerely,
James E. Jarratt

As you are aware from previous discussions, there is no formal institutional partnership between the School of Business and the ILRU on this proposal. Otherwise, there would have been a review by the University's Office of Sponsored Projects, a transmittal letter from the Vice President's office, a formal subcontract executed prior to submission of your proposal, and overhead for the University in the budget. None of these occurred. I was disappointed that the text did not indicate the nature of the relationship, namely that staff at the Business School will participate in the project as private individuals. In this case, clear in the supporting documents and appendices? If not, as the submitter of the proposal, is it not in order that ILRU clarify immediately the relationship in a letter to NIDRR?

Thank you for sending me a copy of the RDBAC proposal, the letters of support, and the diskette. The materials arrived yesterday. Please send me the budget, supporting documents, and appendices. I would appreciate receiving the budget by fax, if possible.

Dear Laurie:

Ms. Laurie Gerken
Director of Technical Assistance
Independent Living Research Utilization
The Institute for Rehabilitation and Research
3323 South Shepard, Suite 1000
Houston, TX 77065

August 13, 1991



August 20, 1991

Mr. Jim Kolter
Better Business Bureau
P.O. Box 7203
Waco, Texas 76714-7203

Dear Mr. Kolter:

Please find attached copies of information about the ADA as well as a biographical sketch on myself and some information about our institute. Feel free to contact me if I can provide you with further information or if you wish to discuss the development of a seminar on the Americans with Disabilities Act (ADA) in Waco.

Sincerely,


Lex Frieden
Senior Vice President

LF:rf

Enclosures:

- copy of ADA Pamphlet from Fulbright & Jaworski
- Lex's Biosketch
- copy of Worklife
- ADA Fact Sheet
- IRRR PR Packet

Attn T.O.

ATC 5 grants Division
ROBZ Room # 3653

202 708 7460

Call her on TH to
give numbers

send 1 orig & 1 copy

admin charges
follow procedure

Joanne Osborne

202 708 7460

T-TUNNEL

The T-Tunnel leads from the large Tranquility Garage to both the City Hall Annex Garage (then to the City Hall Annex) and to the Coliseum and Music Hall.

There are no provisions for wheelchair access in this tunnel. Even with extensive tunnel renovation there would be no way to reach the Music Hall/Coliseum as it is 15 feet from the tunnel floor to ground level and serviced by fairly steep stairs. The cost of installing an elevator would be prohibitive. Fortunately, there are designated surface parking spaces for the disabled adjacent to this facility.

In order to renovate the T-Tunnel and allow the disabled to reach the City Hall Annex, the following steps would have to be taken:

Due to unalterable space constraints the ramp from the garage to the garage landing can only be 43 feet long and would have a rise of 5'-10" (70".)

The resulting slope would be 1:7.4 on a continuous ramp, which is greater than allowed by UFAS. Because of major utility pipes running underneath the proposed ramp area, it is not a feasible project from a cost standpoint to relocate these pipes to create a longer ramp.

Access to the City Hall and City Hall Annex can be achieved through the City Hall Annex Garage.

X

Oct 1st 91, 5 yrs.

David Egmont

Box 732 5801

by Mon Apr 23

CITY OF HOUSTON

INTER OFFICE CORRESPONDENCE

To Lee Elliott Brown, Director
Affirmative Action and
Contract Compliance

FROM Vivian Montejano
Manager, Jones Hall
Civic Center Department

DATE June 27, 1991

SUBJECT ADA Law

Currently there are three handicapped accessible entrances into Jones Hall. Due to the 1991 outside renovations of the facility, the front lobby and backstage door entrances have in fact improved. The handicapped street ramp on Capitol street has been moved closer to the lobby doors, and made wider. The backstage door now has a "U" shaped ramp, which meets all federal guidelines for accessibility to the handicapped. The third handicapped entrance comes directly from the Civic Center parking garage.

The backstage door and courtyard (lower) level entrances lead to the Jones Hall elevator. This elevator carries all guests directly into the facility. The lobby doors is the front entrance, which brings guests directly into the facility. Once inside there is handicapped seating for up to eight wheelchairs. This seating is located in the lower orchestra level, stage right approximately 20 rows from the stage.

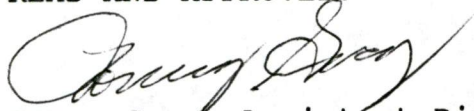
One unisex restroom is accessible to the handicapped. This restroom is located on the courtyard (lower) level, and is accessible via the Jones Hall elevator. During calendar year 1992 inside renovations of Jones Hall are scheduled. Included in the renovations are additional restrooms on all levels of the facility. These restrooms will of course meet all federal regulations for handicapped accessibility.

The inside renovations of Jones Hall scheduled for 1992, as well as this summer's renovations are part of a long range plan funded by the Jones Foundation in cooperation with the Civic Center Department.


Vivian Montejano, Manager

VM:jb

READ AND APPROVED:



Tommy Gray, Assistant Director
Civic Center Department

cc: Gerard J. Tollett

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CITY OF HOUSTON

INTER OFFICE CORRESPONDENCE

TO Lee Elliott Brown, Director FROM Tommy Gray
Affirmative Action and Contract Assistant Director
Compliance Civic Center Department

DATE July 1, 1991

SUBJECT Americans With
Disabilities Act (ADA)

Per your memo dated June 11, 1991 regarding ADA compliance of public access to City buildings which becomes effective July 26, 1992, please see the attached memos prepared by the Managers of the facilities affected, outlining their plans to bring the building they manage into compliance.

If I can be of further assistance, please notify.



Tommy Gray

TG/lg
Attachments
cc: Gerard J. Tollett

ADAmemo

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HOUSTON
DIVISION
AFFIRMATIVE ACTION

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CITY OF HOUSTON

INTER OFFICE CORRESPONDENCE

TO Lee Elliott Brown, Director
Affirmative Action and
Contract Compliance

FROM Diana McKissic, Manager
Music Hall/Coliseum

DATE July 1, 1991

SUBJECT Handicapped Accessibility

In our review the Sam Houston Coliseum is essentially handicapped accessible, however, we do need to upgrade the ramp leading into the Lobby area.

We have taken a visual survey of the Music Hall and concur there are several areas that are required to make it more handicapped accessible.

Because of the eight stairs leading into the lobby of the Music Hall, this will be too steep to have a ramp built. A hydraulic lift from the lower stairs to the top would be more functional. The outside wall is concrete and we believe with the weight of the lift, the wall would support it.

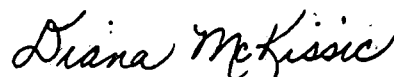
Also, a second hydraulic lift would be required to enter the theater area, and there are at least two options for this lift. If the outside wall structure could support the lift this would be the preferred location. At this time, we do not have any architectural plans, and are not certain if this beam would support the weight.

The second option for the lift is to use the north concession area (also smallest) for the lift to carry patrons to lower area, where the bathrooms are located, and to the lobby area where the platform for wheel chairs is already built.

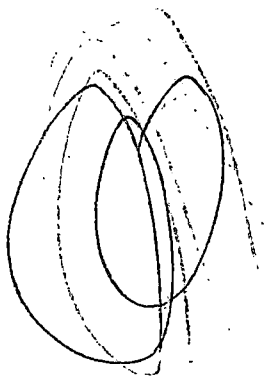
We have money budgeted for this fiscal year for a consultant to survey the areas, and have a consultant standing by waiting on our "go ahead".



READ AND APPROVED:


Diana McKissic

Tommy Gray, Assistant Director
Houston Civic Center



re budget
299,999

rebound 97K
supplies 5141

Other 123,727

letter of confirmation
last sept 01
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5 yrs

At the Wortham Theater tunnel ~~level~~ on the orange level, the handicapped spaces are the spaces closest to the entrance to the tunnel. The entrance is unobstructed by curbs, ramps or protrusions. Entrance is gained through a set of double doors 36" wide that open 90 degrees. A second set of double doors at the other end of the tunnel meet the same specifications. From this point, entrance into the Wortham Theater is via an elevator which meets all design criteria.

verify amt

address ~~pro~~ concerns
3

CIVIC CENTER GARAGE

Total Number of spaces	1743
Number of handicapped spaces	19
Number of handicapped spaces required	27

Summary of accessibility survey:

This parking facility needs 8 additional handicapped spaces. The eight spaces should be distributed as follows: Two on the orange level by the Wortham Tunnel entrance and six on the orange level by the closest entrance to the NCNB Building.

The layout of these spaces would result in a net loss of 4 regular spaces in this garage. The cost of the layout, striping, floor and wall symbols would be approximately \$350.00.

There are three separate concentrations of handicapped spaces in the Civic Center garage.

On the first level (green level) the spaces are located closest to the Jones Hall entrance. To get to the Jones Hall tunnel entrance, disabled persons would encounter no curbs, ramps or other obstructions. The entrance doors consist of are two 36" wide glass doors which open out 90 degrees.

The slope of the ramp in the tunnel is within the UFAS standard for ramps, and the two sets of double doors leading to the access elevator within Jones Hall are both 36" wide and open 90 degrees.

The elevator takes wheel chair patrons to a landing from which a level floor leads to a flat floor space on the orchestra level inside Jones Hall.

On the orange level (2nd level) concourse entrance to the NCNB Building, the handicapped spaces are the parking spaces nearest to the double doors leading into the tunnel.

The glass double doors are 36" wide and open 90 degrees. After entering the concourse people in wheelchairs would encounter the NCNB tunnel doors which are double doors 31 3/4 wide, less than the 32" minimum width set forth in UFAS requirements.

From this entrance into the NCNB Building's tunnel, people can travel through the tunnel system unobstructed to other downtown office buildings. Also, people can take an elevator to the lobby level and from there to NCNB offices, or to other surrounding office buildings.

1 covered by

2 1/2

3 up to 1000

4 1000

5 covered by

6 1000

7 1000

8 1000

9 1000

10 1000

LARGE TRANQUILITY GARAGE

Total Amount of spaces	1201
Number of handicapped spaces	8
Number of handicapped spaces required	22

Summary of accessibility survey:

This parking facility needs 16 additional handicapped spaces. Two of the eight designated spaces in this garage were reserved for two regular parkers who use canes and are regular spaces with floor and wall symbols.

The 16 spaces would conveniently fit in our column spacing, at two per bay. We would have a net loss of 8 regular spaces. The cost of laying out these spaces, striping, painting floor symbols and adding wall symbols would be approximately \$450.00.

The current handicapped spaces are the ones located closest to the elevator. The route to the elevator is not impeded by steep ramps, curbs, thresholds, protruding objects or tight turning spaces.

The control panel in the elevator needs to be completely reworked (replaced) in order to meet UFAS requirements. All of the buttons are too high for a disabled person to reach and the stop button and telephone are located at the top of the panel. Also, the telephone does not work. The call buttons are too high and need to be relocated.

An estimate given to me by General Elevator Company, our elevator contractor, indicates the cost of the project to be approximately \$4,550.

Other than the elevator controls this garage meets standards.

RDBAC BUDGET - YEAR 1

*6-10-86
HARRIS
RDBAC
Action
Jimmie*

		Requested	Matching
<u>Personnel</u>		~~47,000~~ 89,511 ~~98,659~~	~~7,941~~ 10,189
Lex Frieden Project Director	25%	18,600	4,650
Wendy Wilkinson Project Coordinator	100%	30,000	
Yilin Zhu Data Management Specialist	300/6 50%	8,100 ~~15,000~~	
Laurie Gerken Technical Assistance Specialist	20%	8,112	
Laurel Richards Training Specialist	15%	6,408	
Quentin Smith Resource Materials Specialist	10%	3,291	3,291
Margaret Nosek Evaluation Specialist	5%	~~2,248~~	2,248
Dawn Heinsohn Secretary	75%	15,000	
<u>Fringe Benefits</u> (@26.5%)		23,721 ~~26,145~~	~~2,104~~ 2700
<u>Travel</u>		7,820	
Project Coordinator to travel to 8 training sites to conduct ADA training (\$705 per trip X 8 trips - \$5,640)			
Project Director to travel to national meeting of RDBACs (\$855 X 1 trip - \$855)			
PCA to accompany Project Director to national meeting of RDBACs (\$590 X 1 trip - \$590)			
Project Coordinator to travel to Austin to meet with Consumer Education Foundation staff (\$245 per trip X 3 trips - \$735)			
<u>Equipment</u>		2,800	

6400

b) ~~\$7,600~~ in stipends to pay travel expenses of BBB staff members and ILC staff members from participating sites in order to attend DREDF training (~~\$475~~ stipend X 16 participants = ~~\$7,600~~ ⁶⁴⁰⁰ ~~\$400~~)

c) \$1,050 in stipends for personal care attendant to accompany participants to DREDF training (\$350 x 3 personal care attendants = \$1,050)

6) Telephone

~~22,180~~ 21,680

a) \$19,180 in funds to underwrite costs of installing and operating an 800 line technical assistance service for a period of 8 months with an anticipated volume of 36,000 calls

b) ^{2,500} ~~\$3,000~~ equipment, ILRU long distance line charges

7) Postage

~~3,000~~ 2,500

8) Printing/Reproduction

~~4,000~~ 3,000

9) Office Space Rental

~~9,240~~ 8,316

10) Reasonable Accommodation--to provide attendant care for two staff members with disabilities, sign language interpreters for ADA training programs, braille or tape materials for visually impaired persons

~~7,035~~ 7,000

TOTAL DIRECT COSTS

280,651 ~~303,669~~

INDIRECT COSTS (@ 8%)

19,348 21,189 *

TOTAL

299,999 \$ 324,858

74,939

~~72,539~~

~~69,695~~

30,231

~~33,109~~ **

~~102,804~~

~~102,770~~

105,170

* Indirect is charged against \$264,869, which is the total direct charges minus \$36,000 in the contractual category and \$2,800 in the equipment category.

** Represents the difference between TIRR's actual negotiated off-site indirect cost rate of 20.5% and the 8% requested.

Mark Rothstein, Director, Health Law and
Policy Institute; Professor, University of
Houston Law Center

~~400~~
1,500 300 300

Laura Rothstein, Professor, University of Houston
Law Center; Consultant, Public Accommodations and
Special Education; Associate Dean for Student
Affairs, University of Houston,

~~400~~
1,500 300 300

Marilyn Monroe, Executive Director, Texas Society of
Association Directors

500 300 300

Ray Pentecost, Professor, School of Architecture;
Director, The Health Environment Institute,
University of Houston

500 300 300

Brian McDonald, Director, Bureau of Business and Economic
Research, University of New Mexico

500 300 300

Robert Dauffenbach, Professor and Director, Center
for Economic and Management Research, University
of Oklahoma

500 300 300

Donald Market, Director, Bureau of Business and
Economic Research, University of Arkansas

500 300 300

Jerry Wall, Director, Center for Business and Economic
Research, Northeast Louisiana University

500 300 300

2) Advertising

~~3,000~~
\$5,000 in funds to purchase ads in
newspapers in order to reach businesses
who are not members of the BBB (\$100/ad X 50-30
ads in various cities = \$5,000 - ~~3,000~~

3) Meeting Space Rental

\$1,100--meeting space rental, \$550 per
day x 2 days= \$1,100

4) Training Materials

~~\$1,500~~
\$1,313 to purchase ADA training materials

5) Travel

a) \$5,640--Funds for Program Director of the
Consumer Education Foundation of the BBB to travel
to 8 sites as a trainer for the ADA training sessions

Travel to 8 sites (\$705 per trip
X 8 trips = \$5,640)

152,05
19,541
49,579
~~19,541~~
~~19,541~~

21,565

Supplies

Includes paper, pencils,
computer diskettes, software
packages, and duplicating

17000
~~6,000~~ ~~5441~~

Contractual (See Budget Addendum A)

36,000

59,650

Construction

none

Other

1) Consultant fees

54,800 ~~126,245~~ ~~123,229~~ 115,799
~~58,900~~

a) \$24,000--\$3,000 to each participating
ILC to conduct ADA training and technical
assistance activities to begin in month 6
and continue through month 12 of the project
year (\$3,000 per site X 8 sites = \$24,000)

b) \$4,000 to DREDF to provide training to
BBB staff member and ILC staff members from
participating sites. (DREDF costs: \$2,400
consultant fees + \$1,000 travel + \$300
per diem, + \$300 publications = \$4,000)

c) \$10,400 to a training consultant to serve
as a trainer for the ADA training sessions

Travel to 8 sites (\$705 per trip X
8 trips = \$5,640)

Consultant fees (\$300 per day X 2 days
training X 8 sites = \$4,800)

d) Project consultants--~~\$20,500~~ 16,400

James Jarrett, Director, Research Center for Center
for Legal and Regulatory Studies, Graduate School
of Business, University of Texas at Austin 12,000

Jorge Anchondo, Outreach and Communications Specialist,
Graduate School of Business, University of Texas at
Austin 1,000

John Allison, Professor, Graduate School of Business,
University of Texas at Austin 1,000

Bob Hockaday, Executive Director, Texas Association
of Businesses 500

Budget Addendum A--Subcontract with the Consumer Education Foundation (CEF) of the Better Business Bureau

The subcontract with the CEF is based on the following:

		Requested	In-Kind
<u>Personnel</u>		36,000	
Program Director			
Gary Smith	66%	24,000	
President and CEO of Austin BBB			
John Etchieson	15%		11,250
Project Assistant	100%	12,000	

NOTE: Personnel costs include fringe benefits.

Project staff, in addition to the activities outlined below, will develop and implement an ADA needs assessment survey and will locate donated meeting room space for the 8 training sites.

Other

1) Printing, production, design of materials--monthly mailouts to 31 BBB offices (includes postage)		12,000
2) Monthly mailouts by 31 BBB offices in Region VI to 35,000 members		26,000
3) Production of 10 audio tapes on the most often asked questions about ADA (\$500 per tape X 10 tapes = \$5,000)		5,000
4) Space, utilities, equipment rental, and other individual costs associated with this project		5,400
	TOTAL	\$36,000
		\$59,650

NOTE: Travel by BBB personnel to 8 training sites will be paid by ILRU on a reimbursement basis.

ilru**INFORMATION**

ILRU FAX NUMBER (713) 520-5785

TELECOPIER TRANSMITTAL COVER SHEETDATE: Sept 20, 1991TIME: 9:00 Am

PLEASE DELIVER THE FOLLOWING PAGES TO:

NAME: Lex Frieden, Hotel GuestTHIS TELECOPY IS BEING SENT BY: Laurie GerkenNUMBER OF PAGES INCLUDING COVER SHEET: 4

MESSAGE: _____

IF YOU DO NOT RECEIVE ALL PAGES, PLEASE CALL THE TELEPHONE NUMBER INDICATED AS SOON AS POSSIBLE.

TELEPHONE NUMBER (713) 520-0232INDEPENDENT LIVING RESEARCH UTILIZATION, 2323 S. SHEPHERD, SUITE 1000,
HOUSTON, TX 77019

RDBACLET

September 20, 1991

Joanne Osborne
GCS Grants Division
ROB 3
Room 3653
Washington, D.C. 20202-4836

Re: HJ33D10131

Dear Ms. Osborne:

I am writing to you in follow-up to our conversation on Tuesday morning, September 17, 1991 concerning TIRR's application for funding to establish a Regional Disability and Business Accommodation Center (RDBAC) for federal Region VI under NIDRR's Knowledge Dissemination and Utilization Program (CFDA number 84.133D). As indicated in the application submitted, I will serve as the project director for the proposed Region VI RDBAC, which we are prepared to initiate on October 1, 1991, with first year activities to run through September 30, 1992 with first-year funding in the amount of \$299,999. It is our understanding that funding has been recommended for a five-year period that would terminate September 30, 1996.

With regard to the three areas of concern with the proposed RDBAC program that were raised by reviewers, we would like to offer some clarification. The first area of concern that you raised to me relates to the training of people with disabilities and business people regarding ADA and rights and responsibilities under its provisions. Apparently some concern was expressed by one or more reviewers that the proposed training programs might be segregated (i.e., people in business receiving training from other business people, while people with disabilities are receiving training from other people with disabilities). Let me assure you that no such segregated training is planned. For all training activities of the project, both people with disabilities and people representing business will be involved in conducting training regardless of the composition of the target audience. We view it as critical to successful training that both business and "consumer" perspectives be presented regardless of the orientation of the people receiving the training. In addition, trainings will be arranged so that opportunities will be afforded for business people and consumers to participate together in portions of the training program, as well as to participate, respectively, in focused sessions on aspects of the law specific to the information needs of business people and in sessions on disability rights under the law. If this integrated training approach was not conveyed in the original proposal, then it was due to inadequacies in presentation rather than to any intent on our part to indicate that training programs would be segregated.

The second area of concern that you said was expressed by reviewers had to do with lack of detail on plans for regionalization of the program. Although we believed that this subject was fairly well covered in sections of the proposal dealing with what we called "decentralization" of program efforts, I would like to expand somewhat on the material provided in the original application. As indicated in the original proposal, we anticipate offering eight trainings in different locations in Region VI during the first project year. Owing to Texas' large size, three trainings will be offered in Texas (one in the Texas Panhandle, one in the Rio Grande Valley, and one in Dallas), two will be offered in Oklahoma (in Tulsa and in Norman), Louisiana, and New Mexico.

Joanne Osborne
 September 20, 1991
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Prior to offering training in these eight areas, two persons (one person with a disability, identified with assistance of an independent living center in the area, and one business person, identified with assistance of a Better Business Bureau office in the area) from each area will be brought to Houston for basic training on ADA and on plans for the project over the five-year period. These individuals will then form the core of local expert pools to be developed in each of the eight areas over the five-year project period. Referred to in the original application as primary resource teams, these eight sets of two-person teams will not only assist with offering ADA training in their own communities during year one, but will also be expected to work with project staff at ILRU in Houston and BBB in Austin in planning and offering ADA trainings in two other communities in their respective states in year two.

Thereafter, additional trainings will be offered in ever increasing numbers of communities using local resource people identified through previous training programs to assist in the trainings and to serve as members of the local pool of experts as soon as their expertise on ADA has been verified through their participation in a RDBAC-sponsored training program. Year two trainings will be offered in at least 16 sites--expected to be six in Texas, four in Oklahoma, and two each in Arkansas, Louisiana, and New Mexico--thereby expanding further the local resources in each state in Region VI. For the remaining three years of the project, at least 20 training programs will be offered during each year, with the eight primary resource people serving as coordinating faculty in each of the five states, and additional support provided by staff from ILRU and from the Consumer Education Foundation of the BBB in Austin as needed. Distributions of training offered in each state in years three through five will be determined based upon consideration of geographic coverage achieved in each state and resources, including previously trained consumers and business people in each state, available to support training efforts.

Throughout the five-year period, project staff at ILRU and at the BBB in Austin will continue to provide support materials for training activities and to serve in training support roles as necessary to assure high quality in training activities carried out throughout the five-state region. By the end of the five-year project period, RDBAC staff expect to have conducted trainings in at least 80 communities in the five-state region, with the distribution expected to be 18 in Texas, 17 in Oklahoma, and 15 each in Arkansas, Louisiana, and New Mexico. In each of these 80 locations, pools of experts to support continued training and technical assistance on ADA will also be in various stages of development. The plan for regionalization of the training program has been carefully considered and is designed to assure coverage of the entire region, while maintaining quality control of efforts undertaken in each state.

The third concern raised by reviewers relates to the time commitment of the "training specialist" identified in our proposal. The narrative portion of the original funding application and accompanying budget materials indicates that the "training specialist" will devote only 15 percent time and effort to this project. The training specialist will be primarily involved with conceptualizing the training program, developing supporting training materials, conducting initial trainings in Houston, and developing g processes and materials based

Joanna Osborne
September 20, 1991
Page Three

on evaluation results. The preparers of the original funding application recognize that this is indeed primarily a training project, and that in fact more than .15 full time equivalent effort will be required to carry out all of the training required in this five-year project.

In fact, the staff person identified as "project coordinator" in the original application will devote at least half of her time and effort to training activities, with the remaining 50 percent time and effort devoted to project coordination and helping with technical assistance. In order to reflect the important training activities in which this person will be engaged, the title of this position has been changed to project coordinator/trainer in the attached budget materials. Also, funds are requested to purchase the time of consultants who will assist with training at the eight sites. The use of consultants to help with the training has the benefit not only of enabling project staff to access specialized knowledge on ADA for inclusion in the training program, but also allows for expansion of the pool of ADA experts at sites throughout the five-state region in which training will occur. Recognizing the substantial training role of the staff person identified in the original proposal as project coordinator and taking into account the effort of the training specialist, consultants, and other staff of the project, the total staff effort devoted to training approaches one full time equivalent staff person and more than satisfies the concern identified by reviewers that at least a half-time effort should be devoted to training.

Finally, the modifications in budget that you requested have been made and are reflected in budget materials attached to this letter. The total budget has been reduced to \$299,999 from the \$324,858 originally requested. As the attached budget materials indicate, modifications have been made in personnel and fringe benefits, supplies, and in the category of the budget labeled "other."

We believe that we have adequately addressed all of the concerns and requirements which you outlined in our conversation on September 17, 1991. If we can provide any further information to assist you in making a determination on an award for the proposed project, please feel free to contact me at (713) 797-5283. Should I not be available to discuss budget matters when you call, I have authorized Laurie Gerken, ILRU Director of Technical Assistance, to negotiate budget matters on my behalf. She can be reached at (713) 520-0232.

Sincerely,

Lex Frieden
TIIR Senior Vice President

cc: Louisa Adelung
Laurie Gerken
Laurel Richards
Peg Nosck