EMERGENCY PREPARATION FOR ALL

OCR/PBS EDUCATION CAMPAIGN FOR GSA'S RESPONSIBILITIES TO ACCOMMODATE PEOPLE WITH DISABILITIES IN THEIR OEP PLANS

It's the law.

GSA must include individuals with disabilities in our Occupant Emergency plans, even if we are unaware of individuals with disabilities in our facilities.

Keep in mind that people may become disabled during an emergency situation.

The Office of Civil Rights and the Public Building Services' Center for Emergency Management Education kick off their education campaign with the following list of questions and answers:

WHY DO I NEED TO TAKE PERSONS WITH DISABILITIES INTO CONSIDERATION IN OUR OCCUPANT EMERGENCY PLANS, EVEN THOUGH WE DON'T HAVE EMPLOYEES WITH DISABILITIES IN OUR OFFICE?

The Rehabilitation Act of 1973 requires federal agencies to consider accommodations for not only employees with disabilities, but also for the general public who may have disabilities and are visiting our facility. Also, our tenants may have employees or visitors who have disabilities. Additionally, in cases of emergency, occupants may become disabled.

HOW DO WE HANDLE A SITUATION WHERE AN EMPLOYEE DOES NOT WANT TO IDENTIFY HIM/HERSELF AS A PERSON WITH A DISABILITY**?**

The Equal Employment Opportunity Commission has issued guidance that discusses information employers are permitted to gather when developing/updating their OEPs. The three ways that an employer may obtain information are:

1. an employer may ask all individuals whether they will need assistance during an emergency After making a job offer, but before employment begins,.
2. An employer also may periodically survey all of its current employees to determine whether they will require assistance in an emergency, as long as the employer makes it clear that self-identification is voluntary and explains the purpose for requesting the information.
3. Whether an employer periodically surveys all employees or not, the employer may ask employees with known disabilities if they will require

assistance in the event of an emergency. An employer should not assume, however, that everyone with an obvious disability will need assistance during an evacuation. For example, many individuals who are blind may prefer to walk down stairs unassisted. People with disabilities are generally in the best position to assess their particular needs. Keep in mind that disabilities are not always visible.

It is important to note that all employee medical information must be kept confidential. However, first aid and safety personnel may be informed, when appropriate, if the disability might require emergency treatment or if any specific procedures are needed for emergency evacuations.

WHAT TYPES OF ACCOMMODATIONS SHOULD WE CONSIDER IN OUR OEP?

Once accommodation needs have been identified, effective accommodation options should be chosen. Often employees with disabilities are a good resource for accommodation ideas. In addition, contacting local fire, police, and HazMat departments to determine what services they can offer is an excellent resource. Finally, you can contact other resources such as PBS' Center for Emergency Management ((202) 501-0417) or GSA's Office of Civil Rights ((202) 501-0767) which can provide specific accommodation ideas on a case by case basis. The following is an overview of frequently suggested accommodation ideas for emergency evacuation.

General Accommodations:

- Facilities should have emergency alarms and signs showing the emergency exit routes. These alarms and signs should be accessible and maintained in proper working order.
- Employers may want to implement a "buddy system" for all employees. A buddy system involves employees working in teams so they can locate and assist each other in emergencies.
- Areas of rescue assistance may be designated. Section 4.3.11 of the Americans with Disabilities Act Accessibility Guidelines (ADAAG) (http://www.access-board.gov/adaag/html/adaag.htm#4.3) specifically addresses areas of rescue assistance. If these areas do not have escape routes, they should have 1) an operating phone, cell-phone, TTY, and two-way radio so that emergency services can be contacted; 2) a closing door; 3) supplies that enable individuals to block smoke from entering the room from under the door; 4) a window and something to write with (lipstick, marker) or a "help" sign to alert rescuers that people are in this location; and respirator masks.

Motor Impairments:

- To evacuate individuals with motor impairments, evacuation devices may be purchased. These devices help move people with motor impairments down the stairs or across rough terrain. If evacuation devices are used, personnel should be trained to operate and maintain them.
- Any physical barriers (boxes, supplies, furniture) need to be removed to insure a barrier-free route of travel out of the building.
- Arrangements should also be made to make wheelchairs available after evacuation.

Sensory Impairments:

- Lighted fire strobes and other visual or vibrating alerting devices should be installed to supplement audible alarms. Lighted strobes should not exceed five flashes per second due to risk of triggering seizures in some individuals. Section 4.28 of the ADAAG (http://www.access-board.gov/adaag/html/adaag.htm#4.28) specifically addresses alarms.
- Alerting devices, vibrating paging devices, wireless communicators, or two-way paging systems may be provided to alert individuals with hearing impairments of the need to evacuate.
- Tactile signage and maps for employees with vision impairments should be installed. Braille signage, audible directional signage, and pedestrian systems are also available. These products may benefit other people who must navigate smoke-filled exit routes.
- Alpha-numeric pagers or other communication devices may be provided to individuals with speech impairments so they can communicate with personnel in an emergency.

Cognitive/Psychiatric Impairments:

- Ways of communicating with people who have cognitive impairments should also be considered. For example, some individuals may benefit from pictures of buddies, color coding of escape doors and areas of rescue assistance, and information on tape or cd-rom.
- The effects of training for emergency evacuation should be considered. Some individuals with psychiatric impairments benefit from frequent emergency drills, but for others practice drills may trigger anxiety. Notifying employees of upcoming practice drills and allowing them to opt out of participation may be a reasonable accommodation. In this case, another form of training for emergency evacuation procedures may be needed, for example providing detailed written instructions.

It is important to note that this is not an extensive list of options, but a beginning point. Often a person with a disability is the best person to consult. Additionally, you may contact PBS' Center for Emergency Management ((202) 501-0417) or GSA's Office of Civil Rights ((202) 501-0767) to get more information.

HOW OFTEN SHOULD WE UPDATE OUR OEP?

Your OEP should be updated at least yearly. However, if you recognize a need to accommodate persons with disabilities whether they are employees, tenants or members of the public, you should update your OEP to take into account these persons. Additionally, once the plan has been updated, you have to ensure that all concerned parties are aware of these updates.

QUESTIONS, COMMENTS? Please contact PBS' Center for Emergency Management ((202) 501-0417) or GSA's Office of Civil Rights (Voice: (202) 501-0767; TDD: 1-888-267-7660, Fed Relay 1-800-8339)