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**Welcome to the 2010  
Legal Issues Webinar Series**

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**The Equal Employment  
Opportunity Commission  
(EEOC) and the ADA**

**Presented by:**  
Deborah Hamilton, EEOC Trial Attorney &  
Alan Goldstein, Senior Attorney, Equip for Equality  
August 4, 2010

This presentation reflects the views of the author(s) and does not necessarily reflect the views of the United States Equal Employment Opportunity Commission



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## Introduction to the EEOC Process

- What we do and how we do it

## Laws the EEOC Enforces

- Title VII of the Civil Rights Act of 1964  
“Title VII”
- The Equal Pay Act “EPA”
- The Americans with Disabilities Act “ADA”
- The Age Discrimination in Employment Act  
“ADEA”
- Genetic Information Non-Discrimination  
Act

## Types of Discrimination

### ADA

The ADA protects individuals with disabilities. Prohibits most medical inquiries prior to a job offer being made.

Requires that disabled applicants and employees be provided with reasonable accommodations where doing so would not cause an undue hardship on the employer.

## Types of Discrimination

### GINA

The Genetic Information Nondiscrimination Act prohibits genetic discrimination in the workplace. This law took effect in November, 2009 and forbids using genetic information when making employment decisions, restricts an employer's ability to acquire the genetic information of employees, and limits the disclosure of genetic information.

Very new law. Developing body of case law.

## Types of Discrimination

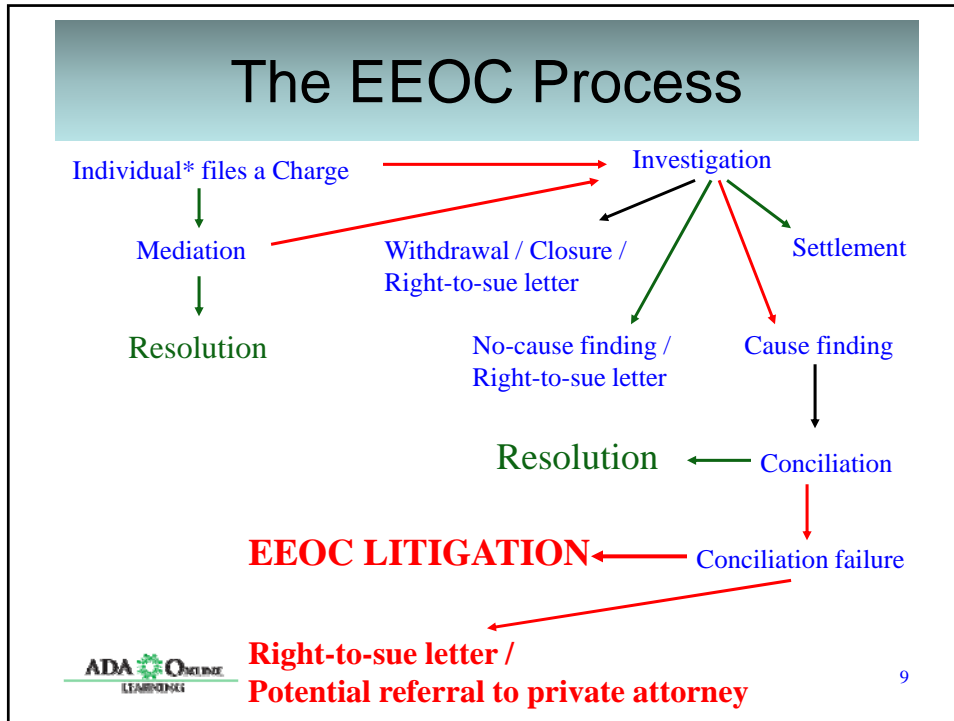
### GINA (cont.)

Genetic Information is any information regarding an individual's genetic tests, the genetic tests of individual's family members, and any diseases, disorders, or conditions of individual's family.

- Family medical history is included in the definition of genetic information because this information is often used to determine what diseases or conditions an individual is predisposed to.

## GINA Claims

- As of April 2010, it has been reported that the EEOC has received over 80 charges from individuals who have alleged they have been discriminated against because of their genetic information.
- Illustrative of these charges is Pamela Fink, who claims she was terminated after her employer discovered she was genetically predisposed to breast cancer.
  - Fink went for genetic testing after her sister was diagnosed with breast cancer. Fink had a double mastectomy as preventive measure; when she returned from surgery she was given fewer responsibilities, demoted, then fired.



## Mediation

- Mediation is available as an alternative to the investigative and litigation processes and is a way to resolve disputes before an investigation begins.
- A mediator is a neutral party to the dispute and helps the parties negotiate a fair and reasonable solution.

[See Equip for Equality Mediation Fact Sheet](#)

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## Mediation

- **Facts about Mediation**

- Mediators are trained in mediation and EEOC law.
- The mediation process is confidential.
- Participation is completely voluntary.
- There is no financial cost to participating in a mediation.
- In 2008, 72% of the cases in mediation reached a settlement.
- Agreements reached in mediation are enforceable in court.

## EEOC Investigations I

- EEOC investigation is not limited to what is alleged in Charge.
  - Can follow up on any discrimination uncovered
  - Can investigate whether class was discriminated against even on individual Charge

## EEOC Investigations II

- EEOC may issue subpoena if employer fails to provide requested documents or witnesses.
- If employer does not respond to subpoena, EEOC may have it enforced in Federal Court.
- Fact that Charge has been filed is confidential during investigation -- unless EEOC has to go to court to enforce subpoena.

## EEOC Investigations III

### YOU HAVE TO TELL THE TRUTH

18 U.S.C. §1001 provides that any person who makes a false statement or submission or who conceals or “covers up” any material fact in a matter before the EEOC may be subject to criminal penalties including **imprisonment** of up to five years.

## EEOC at a Glance

- EEOC has been receiving an average of almost 90,000 Charges per year.
- “Cause” findings are made on only about 5% of all Charges.
- Approximately 1 in 10 “Cause” cases are litigated by the EEOC.



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15

## EEOC and ADA Statistics

	FY 2005	FY 2006	FY 2007	FY 2008	FY 2009
<b>RECEIPTS</b>	14,893	15,575	17,734	19,453	21,451
<b>RESOLUTIONS</b>	15,357	15,045	15,708	16,705	18,776
<b>RESOLUTIONS BY TYPE</b>					
<b>SETTLEMENTS</b>	1,685	1,812	2,037	2,079	2,065
	11.00%	12.00%	13.00%	12.40%	11.00%
<b>WITHDRAWALS W/BENEFITS</b>	846	866	1,005	1,058	1,217
	5.50%	5.80%	6.40%	6.30%	6.50%
<b>ADMINISTRATIVE CLOSURES</b>	2,691	2,452	2,861	2,889	3,358
	17.50%	16.30%	18.20%	17.30%	17.90%
<b>NO REASONABLE CAUSE</b>	9,268	9,077	8,968	9,760	11,174
	60.40%	60.30%	57.10%	58.40%	59.50%
<b>REASONABLE CAUSE</b>	867	850	837	919	962
	5.60%	5.60%	5.30%	5.50%	5.10%
<b>SUCCESSFUL</b>	338	0	322	362	408
	2.20%	2.20%	2.00%	2.20%	2.20%
<b>UNSUCCESSFUL</b>	529	520	515	557	554
	3.40%	3.50%	3.30%	3.30%	3.00%
<b>MERIT RESOLUTIONS</b>	3,398	3,528	3,879	4,056	4,244
	22.10%	23.40%	24.70%	24.30%	22.60%
<b>MONETARY BENEFITS (Millions)</b>	\$44.80	\$48.80	\$54.40	\$57.20	\$67.80



## FACING A CAUSE FINDING: Advice for employers

- If you find yourself facing a cause finding, you should ask yourself, **how did I get here?**

## Cause findings may be the result of:

- 1. Investigator bias.  
(**Very unlikely** - investigators have more than 150 cases to work on each year, why pick on you?)
- 2. Investigator error.  
(**Very unlikely** – Investigators are well trained and experienced. Cases go through 2-3 layers of review before a cause finding.)
- 3. Respondent broke the law.

**MOST LIKELY**

**EMPLOYERS HAVE A GREAT DEAL OF CONTROL  
OVER THE FIRST AND SECOND CAUSES!**

## Investigator “bias”

- While investigator “bias” is very unlikely, investigators do have to make inferences and credibility findings.
- Investigators are humans. As such, their critical reasoning may be affected by their emotions.

### THEREFORE:

- **Treat investigators with respect**
  - **Do not condescend to investigators**
  - **Do not try to “go around” investigators**
- (In other words, treat them the way you would want to be treated.)

## Investigator error

Put responding to the investigation at the top of your “to do” list. **Do not “blow off” the investigation.**

- This is your chance to prove your company acted appropriately and according to law.
- If you try to make a new argument or present more evidence after a cause finding, you’re too late.
- Evidence or arguments that you try to present during litigation that were not presented during the investigation may be used against your company as evidence of “fraud” or pretext.

(Remember, in 19 cases out of 20, the investigator will not find cause.)

## Tips for getting investigators to the “right” outcome

- Provide **supporting documentation** – employers should provide this with position statements.
- Provide responses and witnesses for interview in a **timely** fashion.
- **Supplement** prior submissions when necessary.
- Conduct a **thorough** investigation of your own.
- **Cooperate** with the investigator.

## Tips for avoiding litigation

- Do the right thing: draft and disseminate a policy; train employees; take complaints seriously; insure policy is followed.
- Do NOT ask, “What can we get away with?” but, “What should we be doing to comply with the law?”
- Come to an agreement with EEOC during conciliation. (Also, use pre-investigation mediation and try to settle before a determination.)

**Know the difference between conciliation and settlement talks.**

## Tips for dealing with litigation

- You can't "bury" the EEOC. "Scorched earth" discovery just annoys us and costs your company a lot of money.
- Abusing the charging party or claimants during discovery just makes us mad (and can make your company look bad).
- We're (almost) always willing to talk settlement. The earlier you settle the less your case will cost, in both legal fees and pay-out to claimants.
- Attacking the agency or the investigation will only waste time and run up your legal bills.
- **Never EVER retaliate against charging parties, claimants or witnesses.**



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23

## Unlawful and Unsuccessful Litigation Strategies

- Insistence on a No-Rehire clause.
- Attempting to "Buy-off" the Charging Party and other class members.
- Endless discovery.
- Sue first.



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24

## Tips for settling a law suit with EEOC

- The Chicago District Office “settles” cases through entry of **Consent Decrees**.
- You will be expected, at a minimum, to **post a notice** for your employees, setting forth the terms of the Decree; keep records and make reports to EEOC; provide **training** to employees and/or managers; **pay** compensation to the victims.
- EEOC does **not** engage in **confidential settlements**, EEOC claimants do **not** sign **general releases**.
- EEOC issues a **press release** when it files a suit, and when it finishes a suit.



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25



## EEOC Litigation Under the ADA

- Recent Case Report from the Chicago District Office



## Five Recent Cases

- **EEOC v. Sears** (filed 2004, settled 2010)
  - Employees on workers' comp leave
- **EEOC v. Supervalu** (filed 2009)
  - Employees on disability leave and denied light duty
- **EEOC v. Olsten Staffing** (filed 2008, settled 2010)
  - Employees placed in temporary jobs
- **EEOC v. Americall**
  - Employees given reasonable accommodations
- **EEOC v. Swisshotel**
  - Employees being harassed and wrongfully terminated

## EEOC v. Sears – The Facts

Northern District of Illinois - No. 04 C 7282

- Charging Party was John Bava, who was a service technician for Sears. He was injured on the job when he fell down 14 stairs. As a result of the fall, he suffered knee, back, ankle, and wrist injuries. Additionally, he was diagnosed with Type II diabetes, which was caused by significant weight gain brought on because of his long recovery period. His treatment for injuries sustained in the fall included wrist surgery and knee replacement surgery for both of his knees.

## EEOC v. Sears – The Facts

Northern District of Illinois - No. 04 C 7282

- Consequences from his fall include:
  - receiving injections in his knees to remain limber, and taking pain management medication on a daily basis.
  - unable to bend, squat, or kneel.
  - substantially limited in his ability to lift
  - unable to walk more than 2 blocks at a time
  - cannot sit for long periods without severe pain, and must alternate sitting and standing



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29

## EEOC v. Sears – The Allegations

Northern District of Illinois - No. 04 C 7282

- The EEOC alleged Sears maintained an inflexible workers compensation policy and failed to reasonably accommodate disabled employees.
- EEOC contended that Sears **unreasonably terminated employees who were unable to return to work after their disability leave expired instead of evaluating employees on an individual basis or considering reasonable accommodation** that would possibly allow employees to return to work.



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30

## EEOC v. Sears – The Settlement

Northern District of Illinois - No. 04 C 7282

- EEOC reached a **\$6.2 million settlement** agreement with Sears.
  - EEOC looked for class members who were terminated under Sears' worker's compensation policy. EEOC determined claimant's eligibility to participate in the settlement by considering, among other things, the extent of their impairments, their ability to return to work, and whether or not Sears made any attempt to return them to work.
  - The EEOC found **253 class members who received an average award of \$26,300.**
- Sears was enjoined from discriminating against its employees on the basis of disabilities.
- Sears was enjoined from retaliating against employees who file any claims against discrimination under the ADA.



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31

## Lessons Learned from EEOC v. Sears

### The ADA and Workers' Compensation



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32



## ADA Pitfalls to Avoid in the Worker's Compensation Process

- When evaluating an employee who is injured at work, employers must consider both worker's compensation obligations and the ADA.
  - Employers whose ADA and worker's comp processes are completely separate are likely to run into problems.
- Worker's compensation laws may use different standards from the ADA to determine whether an employee is disabled.
  - An employee who is totally disabled for worker's comp purposes may be entitled to able to return to work with an accommodation under the ADA.

## For Plaintiffs' Lawyers

- Communications with you may constitute part of the interactive process required under the ADA.
- Consider the impact of workers' compensation discovery responses on ADA claims.
- Evaluate the scope of the release that an employer proposes in connection with any worker's comp settlement.

## For Defense Lawyers

- Worker's compensation leave is not a substitute for appropriate accommodations under the ADA.
- An employer may not require an employee with a disability to obtain a full-duty release prior to returning to work.
- Prior to terminating any employee on worker's compensation leave, an employer must consider whether that employee can return to work with an accommodation.

## EEOC v. Supervalu - Facts

Northern District of Illinois - No. 09 CV 5504

- There were 5 Charging Parties who allege discrimination by Supervalu on the basis of disability
  - CP suffered a work related injury that impaired her back. She was placed on leave and restricted from lifting more than 20 lbs. by her physician. Instead of engaging in the interactive process, CP was terminated by Jewel although she could perform the essential functions of her job as a cashier.
  - CP repaired and test drove forklifts and suffered from a seizure disorder. Because of his disorder he received a note from his doctor stating that he could not drive. He requested a transfer but was told he could not work unless he received a release to return to his full work duties.
  - CP was on leave for 11 months after getting back surgery. He was released to work by his doctor as long as he didn't lift over 25 lbs. CP received a letter from Jewel stating he could not perform the essential functions of the job; he was then terminated at the end of his leave.

## EEOC v. Supervalu - Facts

Northern District of Illinois - No. 09 CV 5504

- There were 5 Charging Parties who allege discrimination by Supervalu on the basis of disability
  - CP worked as a produce clerk and injured her arm while on duty. She gave Jewel a note from her doctor which stated she could return to work as long as she didn't work as a cashier, or a job which required similar repetitive movement. Jewel terminated CP at the end of her 1 yr leave, although she requested to return to her previous job as a produce clerk.
  - CP injured her back while on duty and was temporarily placed in a light duty position, from which she asked to be removed because of pain. She was placed on a 1 yr leave and at the end she received a note from her doctor stating she could return to work if she avoided heavy lifting, stairs, and standing for too long. She asked to return to work but was told she couldn't unless she was released to full duties.



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37

## EEOC v. Supervalu

Northern District of Illinois - No. 09 CV 5504

- Jewel-Osco, an entity of the national grocery retailer Supervalu, is alleged to have violated the ADA by :
  - refusing to allow qualified employees with disabilities who are on authorized disability leave, or who are eligible for it, to return to work if they have any work restrictions, and to have terminated them if they reach the one-year mark on leave.
  - refusing to allow qualified employees with disabilities to be assigned to temporary light duty jobs unless they were injured on the job.
  - Litigation is ongoing.



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38

## EEOC v. Olsten Staffing - Facts

Western District of Wisconsin - No 08-cv-565

- The Charging Party, who was profoundly deaf, sought a job on the production line through Olsten Staffing, a temporary employment agency. Olsten decided not to refer CP for a job because it believed that it would create unsafe working conditions.
  - The staffing agency was concerned that: CP would not be able to hear the presence of forklifts and risked being hit by one
- CP was qualified for the job and could communicate with co-workers through notes and gestures.
- Job qualifications included:
  - Occasionally operating a forklift
  - The ability to lift 50 lbs.



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39

## EEOC v. Olsten Staffing

Western District of Wisconsin - No 08-cv-565

- The EEOC alleged that Olsten Staffing had violated the ADA by:
  - refusing to refer a deaf job applicant for temporary employment as a production worker despite his meeting all the actual qualifications for the job.
- The **settlement** included:
  - An injunction against further discrimination on the basis of disabilities
  - A requirement that Olsten provide training to its employees concerning the ADA and report any further complaints of discrimination to the EEOC for the next two years



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40

## EEOC v. Olsten Staffing

Western District of Wisconsin - No 08-cv-565

- **The ADA:**

- Requires that **temporary employment agencies** evaluate job applicants with disabilities on the basis of their ability to perform, with or without reasonable accommodation, the essential functions of the jobs for which they are being considered.
- Prohibits agencies from declining to refer a qualified individual because of his disability
- Gives an agency who has reason to believe that one of its clients is discriminating against one of the agency's temporary employees in any phase of the employment relationship (including hiring and referral), an affirmative obligation to take reasonable steps within its control to remedy that discrimination



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41

## EEOC v. Americall - Facts

Northern District of Illinois - No. 04 C 5554

- CP had been blind since birth, applied for a TSR job with defendant in December 2002.
- She passed a "pre-screen" by telephone and was invited for a "group interview," which she attended with a reader and her guide dog.
- Although she successfully completed a grammar and listening examination, and the interview went well, defendant rejected her for the position, explaining in its rejection letter that the "facility is not conducive for a seeing eye dog."



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42

## EEOC v. Americall

Northern District of Illinois - No. 04 C 5554

- EEOC alleged Americall, a telemarketing firm, violated the ADA by:
  - failing to hire the charging party for a telemarketing service representative because she was blind and used a guide dog. The rejection letter included a statement that the "facility is not conducive for a seeing eye dog."
- The **settlement** included:
  - \$200,000 in monetary relief, consisting of \$191,000 in compensatory damages and \$9,000 in backpay
  - An agreement by Americall to to pursue a cooperative relationship with The Chicago Lighthouse for People Who are Blind or Visually Impaired to promote increased employment opportunities for blind and visually impaired individuals at Americall



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43

## EEOC v. Americall

Northern District of Illinois - No. 04 C 5554

- The **settlement** included:
  - An injunction against discriminating against any qualified employee or applicant with a physical disability in violation of the ADA, and from failing to reasonably accommodate employees or applicants with physical disabilities
  - A requirement that Americall post a notice about the lawsuit and the settlement and also provide training to all of its supervisory, managerial, HR (including corporate HR), recruiting, and training employees regarding disability discrimination and the duty to reasonable accommodate disabled employees.



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44

## EEOC v. Swissôtel - Facts

Northern District of Illinois - No. 08-5131

- The CP was a 30 year old male who was born with mental disability which impaired his intellectual abilities as well as ability to interact socially.
- CP was employed as a steward and his job duties involved washing dishes and cleaning floors, duties which he had performed satisfactorily in previous positions.
- CP was repeatedly harassed by his supervisor and was called “retarded”, sworn at, and called names and embarrassed in front of other employees.
- The harassment worsened after CP reported the incidents to HR. CP was often scheduled for back to back shifts and a result from this scheduling was CP fell asleep in the locker rooms and then subsequently fired.



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45

## EEOC v. Swissôtel

Northern District of Illinois - No. 08-5131

- EEOC alleged Swissôtel violated the ADA by:
  - Allowing the harassment of an employee with development disability. Specifically, two supervisors repeatedly called the employee “retarded.”
  - Terminating the employee because of his disability.
- The **settlement** included:
  - \$90,000 award
  - A requirement to train all Chicago based employees in the ADA
  - A requirement that the employer post a notice informing employees of the lawsuit and settlement



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46

## What do these cases tell us about EEOC's ADA enforcement efforts?

- Breadth of issues being addressed
  - Number of persons affected
  - Range of types of violations
  - Range of employers
- Significant settlements both in terms of monetary relief and injunctive relief provisions.

## Where is EEOC headed next with regard to ADA compliance?

- ADA Amendments Act of 2008
  - The Notice of Proposed Rulemaking for the ADAAA was published in the Federal Register for a 60 day comment period in September, 2009.
- Topic of your next webinar in this series



## ADA Amendments Act Highlights

1. Removes *Sutton* requirement for mitigating measures;
2. Shifts focus of inquiry from whether an individual is a “qualified individual with a disability” to whether discrimination occurred;
3. Emphasizes the “broad coverage of individuals”;
4. States that the EEOC & courts' interpretations of the term "substantially limits" were too restrictive;

## ADA Amendments Act Highlights

5. Defines "major life activity" more broadly, including major bodily functions;
6. Eliminates the “substantial limitation” requirement for “regarded as” claims;
7. Clarifies that an impairment that is episodic or in remission is evaluated when active;
8. Directs the courts to interpret the ADA as a remedial statute, i.e., liberally; and
9. Amends the Rehabilitation Act for consistency.

## EEOC Role and priorities moving forward

- Continue to see active litigation under the ADA from the EEOC as the law under the ADA Amendments Act is developing.

## Equip for Equality Collaborations with the EEOC

- Equip for Equality (EFE) has formed a collaboration with the EEOC in several areas:
  - ❖ EEOC-approved ADA Trainer for businesses
  - ❖ Pro-se Charging Parties are provided information about EFE for mediation.
  - ❖ Where cause is found in pro-se filings, employees are referred to EFE for possible representation.
  - ❖ EFE has also intervened in a case where EEOC filed suit.

## Practical Tips for Employees


### On the job:

- Medical conditions do not have to be disclosed unless a reasonable accommodation is needed
  - ❖ or unless the employer has a reasonable basis for believing there are performance or safety issues.
- While employed, document: Reasonable accommodation requests, medical disclosures, harassment, retaliation, disparate treatment,...
- Know and follow procedures and policies.
- Provide medical information when appropriate.
- **Personnel Files:** Feel free to add information or request a copy.

## Practical Tips for Employees


### At the EEOC:

- List all possible claims in the Charge of Discrimination
  - ❖ Make sure the box is checked if retaliation is involved.
- Do not miss the deadline for filing 180 / 300 days.
- Take advantage of mediation, if available.
- Promptly and completely provide requested information.
- Treat EEOC staff with courtesy and respect.
- After receiving the right to sue – request the EEOC file immediately and don't miss the 90-day deadline.



Thank you for your attention today


**The EEOC and the ADA**



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## General ADA Resources

- **DBTAC: Great Lakes ADA Center:** [www.adagreatlakes.org](http://www.adagreatlakes.org); 800/949 – 4232(V/TTY)
- **Equal Employment Opportunity Commission (EEOC):** [www.eeoc.gov](http://www.eeoc.gov)
- **ADA Disability and Business Technical Assistance Center:** [www.adata.org](http://www.adata.org)
- **Equip For Equality:** [www.equipforequality.org](http://www.equipforequality.org); 800/537-2632 (Voice); 800/610-2779 (TTY)
- **Job Accommodation Network:** [www.jan.wvu.edu](http://www.jan.wvu.edu)



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56




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Thank you for Participating In  
Today's Session

Please join us for the next session in this series:  
**September 29, 2010**  
**Litigation Under the ADA  
Amendments Act**




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The EEOC and the ADA  
The End

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August 4, 2010

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