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**Chapter 4 Addendum:  
Title II Checklist  
(9-1-1 and Emergency Communications Services)**

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**PURPOSE OF THIS CHECKLIST:** This checklist is designed **to identify common problems with the accessibility of a state or local government's 9-1-1 and emergency communications services.**

**MATERIALS AND INFORMATION NEEDED:** To identify common problems in complying with the effective communication requirements for 9-1-1 and emergency communications services, you will need:

- ✓ a written description of equipment used by 9-1-1 and other emergency communications services (*e.g.*, police, fire, ambulance, poison control) and how that equipment handles TTY calls;
- ✓ a copy of any policies or procedures regarding how your emergency communications services handle silent, open line calls;
- ✓ a copy of any materials used in training emergency communications call takers about TTYs and the handling of TTY calls and information about the frequency of such training;
- ✓ a copy or description of your emergency communications service's policy regarding maintenance and back-up of TTY equipment and the policy regarding maintenance and back-up of equipment for handling standard voice telephone calls;
- ✓ a copy of your emergency communication service's policy regarding testing of TTY equipment and the handling of TTY calls and policy regarding testing of standard voice call-taking equipment and the handling of standard voice calls;
- ✓ the results of unannounced test calls made to your emergency communications services telephone number with a TTY;

- ✓ statistics for response time to standard voice calls as compared to TTY calls received by the service (if you cannot identify which emergency calls were TTY calls, use the response time for unannounced TTY test calls); and
- ✓ feedback from meetings with community members who are deaf, are hard-of-hearing, and have speech disabilities to find out about their experiences in contacting 9-1-1 and emergency communications services and to keep abreast of the communication technology individuals with these disabilities will have available when they attempt to access emergency services when at home or away.

## TTY-Compatible Equipment

1. Do you have a TTY or TTY-compatible equipment at every emergency communications services call-taking position?

- Yes
- No

2. Do you have procedures for maintaining TTYs and TTY-compatible equipment that are as effective as the maintenance procedures for voice telephone equipment?

- Yes
- No

3. If you have a plan for back-up equipment in case of equipment malfunctions, telephone line malfunctions, or power failure, does that plan cover TTY calls and equipment ?

- Yes
- No

### **ACTIONS:**

If you checked "no" to any of the preceding questions, your office may be violating the requirement for providing equally effective emergency communications services.

- ✓ Ensure that a working TTY or TTY-compatible equipment is provided at every emergency communications position.
- ✓ Develop procedures for maintaining TTYs and TTY-compatible equipment that are as effective as the maintenance procedures for voice telephone equipment.
- ✓ If you have a plan for back-up equipment in case of equipment malfunctions, telephone line malfunctions, or power failure, ensure that the plan covers TTY calls and equipment.

## Equal Access

4. Is the response time of the telephone emergency services provided for TTY users equal to the response time of the services provided to others?

- Yes
- No

5. Is the response quality of the telephone emergency services provided for TTY users equal to the response quality of the services provided to others?

- Yes
- No

6. Are the hours of operation of the telephone emergency services provided for TTY users equal to the hours of operation of the services provided to others?

- Yes
- No

7. If the telephone emergency services provide additional features (such as automatic number identification, automatic location identification, automatic call distribution), are the features provided to TTY users equal to the features provided to others, whenever feasible? (Feasibility should be determined based on the availability of technology in the marketplace to perform the function for communications received from TTY users.)

- Yes
- No

8. Do call takers respond to each silent, open line call by querying the line with a TTY?

- Yes
- No

9. Can all call takers easily switch back and forth between TTY mode and voice mode during a call?

- Yes
- No

**ACTIONS:**

If you checked “no” for any of the questions above, your office may be violating the requirement for providing equally effective emergency communications services.

- ✓ Ensure that telephone emergency services provided for TTY users are equal in response time to services provided to others.
- ✓ Ensure that telephone emergency services provided for TTY users are equal in response quality to services provided to others.
- ✓ Provide telephone emergency services to TTY users during the same hours of operation as services provided to others.
- ✓ Ensure that telephone emergency services provided for TTY users are equal in all other features offered (including automatic number identification, automatic location identification, automatic call distribution, etc.).
- ✓ Ensure that call takers respond to each silent, open line call by querying the line with a TTY.
- ✓ Ensure that all call takers can easily switch back and forth between TTY mode and voice mode during a call.

## Training

10. Is TTY training mandatory for all emergency communications services personnel who may have contact with individuals from the public who have hearing or speech disabilities?

- Yes
- No

11. Do telephone emergency services require or offer refresher training for TTYs at least as often as they require or offer training for voice calls, and at least every six months?

- Yes
- No

### **ACTIONS:**

If you checked “no” to either of the questions above, your office may be violating the requirement for providing equally effective emergency communications services.

- ✓ Make TTY training mandatory for all personnel who may have contact with individuals from the public who have hearing or speech disabilities.
- ✓ Ensure that telephone emergency services require or offer refresher training for TTYs at least as often as they require or offer training for voice calls, and at least every six months.

## Testing

12. Do you test your telephone emergency services to ensure direct, equal access for people using TTYs?

- Yes
- No

### **ACTIONS:**

If you checked “no,” your office may be violating the requirement for providing equally effective emergency communications services.

- ✓ Conduct unannounced tests to all call-taking positions and all call takers using both silent, open line calls and calls transmitting TTY tones.
- ✓ Keep records of the results of all test calls. Include the date and time of each call, identification of the call-taking position, whether the call was silent or transmitted tones, whether the caller received a TTY response and the content of the response, the time elapsed and the number of rings from the initiation of the TTY call until the call taker responded by TTY, and whether the call was processed according to your standard operating procedures.

The Americans with Disabilities Act authorizes the Department of Justice (the Department) to provide technical assistance to individuals and entities that have rights or responsibilities under the Act. This document provides informal guidance to assist you in understanding the ADA and the Department's regulations.

This guidance document is not intended to be a final agency action, has no legally binding effect, and may be rescinded or modified in the Department's complete discretion, in accordance with applicable laws. The Department's guidance documents, including this guidance, do not establish legally enforceable responsibilities beyond what is required by the terms of the applicable statutes, regulations, or binding judicial precedent.