



## American Disabilities Act Policy

### **POLICY**

It is the policy of Ion Bank to ensure that communications with individuals with disabilities are as effective as communications with individuals without disabilities, consistent with the requirements of title III of the Americans with Disabilities Act (ADA), 42 U.S.C. §§ 12181 - 12189, and the regulation implementing title III, 28 C.F.R. pt. 36. To meet this obligation, the Bank will provide, free of charge, appropriate auxiliary aids and services, whenever necessary, to ensure that individuals with disabilities have an equal opportunity to participate in, and benefit from bank services, facilities, privileges, advantages, or accommodations. 28 C.F.R. §§ 36.301(c), 36.303.

### **PURPOSE**

This policy confirms Ion Bank's commitment to doing business with individuals with disabilities. It also sets forth standards for effective communication with such individuals.

### **SCOPE**

This policy applies to all Ion Bank businesses. It addresses communications with all individuals with disabilities (customers, potential customers, and their companions) using or attempting to use Ion Bank services or facilities. Businesses that have contact with external customers, potential customers, and/or their companions have specific requirements under this policy (see "Line of Business Procedures" below).

### **DEFINITIONS**

Definitions of certain terms used in this policy are found in Appendix 1.

### **POLICY STATEMENT**

Consistent with the requirements of Title III of the Americans with Disabilities Act (ADA), it is the policy of Ion Bank not to discriminate against any individual with a disability in the full and equal enjoyment of our goods, services, facilities, privileges, advantages, and accommodations. It is also our policy to ensure that communications between our employees and individuals with disabilities are as effective as communications between our employees and individuals without disabilities. Ion Bank will provide, free of charge, appropriate auxiliary aids and services whenever necessary to ensure effective communication with individuals with disabilities.

### **STANDARDS FOR EFFECTIVE COMMUNICATION**

Ion Bank provides effective communication to our customers, potential customers, and their companions, with disabilities in accordance with the Americans with Disabilities Act (ADA) and applicable state and local laws. Following are some of the ways we communicate with persons with disabilities:

For persons who are deaf, are hard of hearing, or have speech disabilities:

- We accept relay calls and will use relay services to call the customer.

- In online banking, customers may communicate with customer service representatives during regular banking hours to assist them in their banking transactions.
- In our branches, we will communicate by exchanging notes or provide, by appointment, a qualified interpreter for more complex or lengthy discussions.

For persons who are blind or have low vision:

- Provide assistance in reading and filling out forms.
- Make available raised line and large print checks.
- Provide account statements in alternate formats.

The Bank recognizes that persons may have other disability-related needs and will evaluate disability-related requests on a case-by-case basis.

Questions or concerns should be directed to the ADA Coordinators:

Anne Rivers- [ada@ionbank.com](mailto:ada@ionbank.com) - 203.714.8813

Stephanie Bliga- [ada@ionbank.com](mailto:ada@ionbank.com) - 203.720.5315

### **REQUESTS FOR AUXILIARY AIDS AND SERVICES**

When Ion Bank is notified that an auxiliary aid or service has been requested, Ion Bank employees will determine the requirements and preferences of the individual with the disability. Ion Bank will respond in a reasonable timeframe to requests for auxiliary aids and services to ensure that delays in responding do not deny individuals with disabilities an equal opportunity to participate in and benefit from Ion Bank services. Documentation of disability will generally not be requested or required.

### **DETERMINING TYPES OF AUXILIARY AIDS AND SERVICES**

The determination of which appropriate auxiliary aids and services are necessary and the timing, duration, and frequency with which they are provided, in order to ensure effective communication, will be made by Ion Bank. Where possible, Ion Bank will make the determination in consultation with the individual who has a disability, based on an individualized assessment. The assessment will take into account all relevant facts and circumstances, including without limitation the following:

- The nature, length, and importance of the communication at issue
- The individual's communication skills and knowledge
- The individual's request or statement of need for a specific auxiliary aid or service
- The availability, at the required times, of appropriate auxiliary aids and services including, but not limited to, qualified sign language or oral interpreters

Before determining the type of interpreting service (or other auxiliary aid or service) to be secured, Ion Bank will consult with the individual requiring interpreter service (or other auxiliary aid or service) and recognize his or her preferred mode of communication. In determining what types of auxiliary aids or services are necessary, Ion Bank will give consideration to the requests of the individual.

### **ACCEPTING REQUESTS**

Requests for auxiliary aids or services can be made by an individual with a disability who needs the auxiliary aids or services, or by someone acting on that individual's behalf. Requests can be made orally or in writing.

Ion Bank may ask that requests for interpreters be made in advance, whenever possible, to better enable Ion Bank to address the communication needs of the individual. However, all requests for auxiliary aids and services will be addressed in a reasonable timeframe and in accordance with ADA requirements.

## **RECORDS REGARDING REQUESTS & POSSIBLE DECISION TO DENY REQUEST**

Except for simple requests that are immediately granted, the ADA Coordinator will maintain records of requests for auxiliary aids and services.

If, after consulting with an individual requesting auxiliary aids or services, the ADA Coordinator believes auxiliary aids or services should be denied, or that an auxiliary aid or service different than that requested should be provided, then the ADA Coordinator will retain records. These records must include a description of any auxiliary aids and services that were provided; the date they were provided; reasons for denying the requested auxiliary aids and services; and the decision maker's name and title.

All decisions denying a requested auxiliary aid or service on the grounds that doing so would result in a fundamental alteration or impose undue burdens must be made by the ADA Coordinator after considering all resources available to the Bank for use in the funding and operation of the Bank's services, and must be accompanied by a written statement of the reasons for reaching that conclusion.

## **FRIENDS AND FAMILY MEMBERS**

Ion Bank employees may **not** ask or require friends or family members to interpret for individuals who are deaf, are hard of hearing, or have speech disabilities, because a family member or friend may not be qualified to render the necessary interpretation due to factors such as professional or personal involvement. Where the individual with a disability specifically requests that an accompanying adult interpret or facilitate communication, the accompanying adult agrees to provide such assistance, and reliance on that adult for such assistance is appropriate under the circumstances, Ion Bank will permit such assistance.

## **COST**

Ion Bank will not charge or ask individuals with disabilities to pay for the cost of an auxiliary aid or service needed for effective communication.

## **WEBSITE ACCESSIBILITIES**

Ion Bank takes reasonable measures to ensure ensures that Ion Bank public websites are have accessible features for people with disabilities.

### **A Few Basic Terms**

To understand the basics of website accessibility, you need to know a few terms:

Webpage – an Internet-based document, usually in HTML format, that can contain a wide variety of information and multimedia content.

Website – a collection of webpages that is hierarchically organized around a homepage.

Web browser – a computer program that downloads webpages. It is the program installed on your computer that you use to access webpages on the Internet.

HTML – short for "hypertext mark-up language," a common mark-up language used to present webpages. It tells the web browser how information should be structured and accessed.

Screen reader – a computer program that speaks written text. It allows a person to listen to the written text on a webpage or in a computer program. Screen readers read only text; they cannot describe pictures or other images, even if the images are pictures of text.

HTML tags – specific instructions understood by a web browser or screen reader. One type of HTML tag, called an “alt” tag (short for “alternative text”), is used to provide brief text descriptions of images that screen readers can understand and speak. Another type of HTML tag, called a “longdesc” tag (short for “long description”), is used to provide long text descriptions that can be spoken by screen readers.

**Web pages and content are accessible:**

- HTML accessible coding is used.
- The Website is designed so it can be displayed using the color and font settings of each visitor’s browser and operating system.
- Images including photos, graphics, scanned images, or image maps the text equivalent will use alt or longdesc tags for each.
- For online forms and tables, all elements are accessible by labeling each control (including buttons, check boxes, drop-down menus, and text fields) with a descriptive HTML tag.
- All documents on the website are always available in HTML or a text-based format.

**STANDARDS FOR ADMINISTERING THIS POLICY**

The Bank has procedures for contact with external customers, potential customers, and/or their companions in place addressing various aspects of communicating with individuals with disabilities described in this policy. Procedures will include the following:

- Who to contact within that line of business, if there are questions about how the requirements of this policy are handled in that business
- How to handle requests for auxiliary aids or services
- Deciding which auxiliary aids or services to provide
- Requesting auxiliary aids or services
- How to handle situations where an auxiliary aid or service is denied, or an auxiliary aid or service different than that requested is provided

## **Appendix 1: Definitions**

### **Appropriate Auxiliary Aids and Services**

Appropriate auxiliary aids and services include a wide variety of equipment, materials, and personal services that may be necessary to ensure effective communication for individuals with disabilities. 28 C.F.R. § 36.303.

### **Hearing/Speaking:**

Appropriate auxiliary aids and services for individuals who are deaf, are hard of hearing, or have speech disabilities include but are not limited to the following:

- Qualified sign language and oral interpreters, including on-site and video remote interpreting (VRI) services
- Note takers
- Written materials
- Telephone communication using relay services
- Accessible electronic information technology (for example, accessible websites)
- Assistance with unfamiliar locations
- Other methods of delivering effective communication to these individuals, including methods that may come into use or existence

### **Vision:**

Appropriate auxiliary aids and services for individuals who are blind or have low vision include but are not limited to the following:

- Qualified readers
- Note takers
- Braille materials or tactile materials (for example, raised line checks and check writing templates)
- Large print materials
- Materials in accessible electronic formats (e-mail, HTML, word-processing format)
- Magnifying Glasses
- Accessible electronic information technology (for example, accessible websites)
- ATMs with tactile input mechanisms and audible output
- Other methods of delivering effective communication to these individuals, including methods that may come into use or existence

### **Fundamental Alteration**

A "fundamental alteration" is a modification that is so significant that it alters the essential nature of the services, facilities, privileges, advantages, or accommodations offered.

### **Qualified Interpreter**

A "qualified interpreter" means an interpreter who, via a video remote interpreting (VRI) service or an on-site appearance, is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Qualified interpreters include, for example, sign language interpreters, oral transliterates, and cued-language transliterates.

Specialized terminology necessary for effective communication with an individual who is deaf or hard of hearing or who has a speech disability needs to consider that individual's language skills and education. Not all interpreters are qualified for all situations. For example:

- An interpreter who is qualified to interpret using American Sign Language (ASL) is not necessarily qualified to interpret orally.
- Someone who has only a rudimentary familiarity with sign language or finger spelling is not a "qualified sign language interpreter."
- Someone who is fluent in sign language but who does not possess the ability to process spoken communication into the proper signs or to observe someone signing and translate their signed or finger-spelled communication into spoken words is not a "qualified sign language interpreter."
- An interpreter who knows tactile interpreting may be the only interpreter who is qualified to interpret for someone who is both deaf and blind.

Although an interpreter may be certified, a certified interpreter is not necessarily "qualified." Similarly, certification is not required in order for an interpreter to be "qualified."

### **Qualified Reader**

A "qualified reader" means a person who is able to read effectively, accurately, and impartially using any necessary specialized vocabulary. When assisting a person in reading documents or completing forms that involve confidential personal or financial information the assistance must be provided in a private area in order to preserve the privacy of the individual who is being assisted.

### **Undue Burden**

"Undue burden" means significant difficulty or expense. In determining whether an action would result in an undue burden, factors to be considered include:

- The nature and cost of the action needed.
- The overall financial resources of the site or sites involved in the action; the number of persons employed at the site; the effect on expenses and resources; legitimate safety requirements that are necessary for safe operation, including crime prevention measures; or the impact otherwise of the action upon the operation of the site.
- If applicable, the overall financial resources of any parent corporation or entity; the overall size of the parent corporation or entity with respect to the number of its employees; the number, type, and location of its facilities.
- If applicable, the type of operation or operations of any parent corporation or entity, including the composition, structure, and functions of the workforce of the parent corporation or entity.

### **Video Remote Interpreting Service**

"Video remote interpreting service" (VRI) means an interpreting service that uses video conference technology over dedicated lines or wireless technology offering high speed, high bandwidth video connection that delivers high-quality video images meeting the following requirements:

- a. Real-time, full motion video and audio over a dedicated high-speed, wide bandwidth video connection or wireless connection that delivers high-quality video images that do not produce lags, choppy, blurry, or grainy images, or irregular pauses in communication;
- b. A sharply delineated image that is large enough to display the interpreter's face, arms, hands, and fingers, and the participating individual's face, arms hands, and fingers, regardless of his or her body position;
- c. A clear, audible transmission of voices; and
- d. Adequate training for users of the technology and other involved individuals so that they may quickly and efficiently set up and operate the VRI.