

Peoples Bank, Lawrence, KS

Americans With Disabilities Act (ADA) Policy

PURPOSE

To establish policy regarding equal access for guests, prospective guests / consumers, bankers, and other stakeholders with disabilities and to ensure that Peoples Bank Lawrence, KS is in compliance with the non-discrimination provisions of State and Federal laws, rules, and executive orders.

I. AUTHORITY

The Americans with Disabilities Act of 1990, Titles I, III, and V Federal Law, The Americans with Disabilities Act (ADA) of 1990, as amended.

II. DEFINITIONS

- A. Internal ADA Coordinator - The Board of Directors has designated the Human Resources Director as the Internal ADA Coordinator. The Internal ADA Coordinator is responsible for providing information, resources, and technical assistance to managers, supervisors, and bankers in complying with ADA requirements, with a particular emphasis in ADA compliance regarding employment actions.
- B. External ADA Coordinator - The Board of Directors has designated the Chief Compliance Officer as the External ADA Coordinator. The External ADA Coordinator is responsible for providing information, resources, and technical assistance related to ADA accessibility for guests regarding Peoples Bank facilities and access to Peoples Bank electronic services.
- C. Guest, prospective guest / consumer, banker, or stakeholder with a disability - One who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment, or is regarded as having such impairment. Major life activities include, but are not limited to, walking, working, seeing, hearing, speaking, breathing, learning, caring for oneself, sitting, standing, lifting, reading, and performing manual tasks.

III. POLICY

Peoples Bank assures access to Bank employees, guests, prospective guests / consumer, bankers, and other stakeholders with disabilities, to include building access and access to electronic services. Peoples Bank will provide reasonable accommodations to ensure that services, programs, and activities are readily accessible to those with disabilities. These accommodations must be made in a timely manner and on an individualized and flexible basis.

It is the responsibility of individual to identify themselves as an individual with a disability when seeking an accommodation. It is also the responsibility of individual to document their disability (from an appropriately licensed professional) and to demonstrate how the disability limits their ability to complete the essential functions

Peoples Bank, Lawrence, KS

Americans With Disabilities Act (ADA) Policy

of their job or interact with the electronic services of Peoples Bank. Medical documentation will be kept confidential.

IV. ROLES AND RESPONSIBILITIES

A. Board of Directors

1. To maintain a position of Internal ADA Coordinator for managers, supervisors, and bankers.
 - The Internal ADA Coordinator will distribute pertinent information and coordinate assistance as needed to ensure physical and electronic access for managers, supervisors, and bankers.
2. To maintain a position of External ADA Coordinator for guests, prospective guests / consumer, and other stakeholders;
 - The External ADA Coordinator will distribute pertinent information and coordinate technical assistance as needed to ensure physical and electronic access for guests with disabilities.
3. The External ADA Coordinator, in conjunction with the Internal ADA Coordinator, will ensure that all department practices and any provision of reasonable accommodations requested will comply with ADA requirements.

B. Supervisory Responsibility

1. Managers and Supervisors must immediately bring any request for access issues or any specific request for a reasonable accommodation regarding access issues from non-Peoples Bank employees to the attention of their chain of command, and to the External ADA Coordinator.

V. PROCEDURES

A. Duty to Accommodate

To receive an accommodation under the ADA, a banker, prospective guest / consumer, or guest must make an initial request to a manager, supervisor, or HR of a Peoples Bank branch or organization. The banker, prospective guest / consumer, or guest should include documentation of his or her functional limitations. Please keep in mind that requests made are ultimately elevated to the Internal and External ADA Coordinators. Note: If you receive a request for accommodations from someone, that request should be elevated to the designated Internal or External ADA Coordinators.

The Internal and External ADA Coordinators will, upon request, and after consultation with Bank Executive Management, along with the guidance of legal counsel, provide a reasonable accommodation to the known physical or mental limitations of a guest or employee with a disability, unless the

Peoples Bank, Lawrence, KS

Americans With Disabilities Act (ADA) Policy

accommodation would fundamentally alter the nature of the Bank's mission, cause significant difficulty or expense, or otherwise impose an undue hardship. Examples of reasonable accommodation may include, but are not limited to:

1. Making facilities accessible to a person with a disability;
2. Acquiring or modifying equipment or devices;
3. Acquiring or modifying guest facing websites; and
4. Acquiring or modifying training materials.

B. Website(s)

Peoples Bank website should be compliant with Title III of the Americans with Disabilities Act (ADA). The Department of Justice has not yet established rules and regulations governing website accessibility, however, Peoples Bank should conduct an ADA compliance review assessment and develop a plan to mitigate non-compliance of Title III. Guest complaints of discrimination should be sent to the External ADA Coordinator for processing and review.

Guidance:

1. Peoples Bank's website should be compliant with Title III of the Americans with Disabilities Act of 1990 ("ADA"), 42 U.S.C. §§ 12181- 12189 ("ADA") and its implementing regulation, 28 C.F.R. pt. 36.
2. Website requirements should include at minimum, the Web Content Accessibility Guidelines (WCAG) 2.0 Level A and AA Success Criteria ("WCAG 2.0 AA"). The guidelines at the website location: <http://www.w3.org/TR/WCAG20/>, provides all of the documentation to successfully identify, understand, and meet or exceed Level A and AA criteria.
3. The project committee when developing or updating a website should have a Plan of Actions and Milestones (POA&M) to define:
 - i. Who is responsible for the development or updates to be compliant with ADA regulation(s)
 - ii. What website(s) and webpages have to be ADA compliant
 - iii. When the website(s) and webpages will be:
 - a. Level A compliant
 - b. Level AA compliant
4. Provide verification by a third party organization or utilize a static website auditor like "Bobby". The original Bobby was a free online tool, written by Josh Krieger and provided by the Centre for Applied Special Technology (CAST) used to validate websites for WAI and Section 508 compliance. Launched in 1995, it became well known for the usage of the Bobby Approved icon that website authors could use to indicate they have successfully passed the Bobby online test. The CAST tool was officially closed on May 1, 2005. Currently, the Web Accessibility Evaluation Tool (WAVE) provides this free service at wave.webaim.org (<http://wave.webaim.org/>).

Peoples Bank, Lawrence, KS

Americans With Disabilities Act (ADA) Policy

5. Each time there is a change to the website's infrastructure or significant changes to the website's look and feel, Item 4. should be performed to verify compliance to ADA success criteria. Note, minor changes to website text do not require an audit. A change to an image or link needs to make sure the alternate text has been updated correctly.
6. Update accordingly when the Justice Department or WCAG 2.0 Guidelines are updated.

C. Complaint of Discrimination

Any managers, supervisors, and bankers who believes he or she has been unlawfully discriminated against on the basis of disability may file a complaint with the Internal ADA Coordinator, the Peoples Bank HR director in the Bank's Overland Park Southcreek corporate offices, 13180 Metcalf Avenue, Overland Park, KS 66213, telephone 913.681.3030. The Internal ADA Coordinator will then consult with Executive Management and legal counsel to form a timely response to the complainant. Written complaints will receive written replies. Oral complaints will receive oral replies.

Any guest, prospective guest / consumer, or stakeholder who believes he or she has been unlawfully discriminated against on the basis of disability may file a complaint with the External ADA Coordinator, the Peoples Bank Chief Compliance Officer. The External ADA Coordinator may be reached at 13180 Metcalf Avenue, Overland Park, KS 66213, telephone 913.239.2900. The External ADA Coordinator will then consult with Executive Management, the Internal ADA Coordinator, and legal counsel to form a timely response to the complainant. Written and oral complaints will receive written replies.