

Ronald Reagan Presidential Library Digital Library Collections

This is a PDF of a folder from our textual collections.

Collection: Roberts, John G.: Files
Folder Title: JGR/Handicapped Regulations
Box: 27

To see more digitized collections visit:

<https://reaganlibrary.gov/archives/digital-library>

To see all Ronald Reagan Presidential Library inventories visit:

<https://reaganlibrary.gov/document-collection>

Contact a reference archivist at: reagan.library@nara.gov

Citation Guidelines: <https://reaganlibrary.gov/citing>

National Archives Catalogue: <https://catalog.archives.gov/>

MEMORANDUM

THE WHITE HOUSE

WASHINGTON

January 20, 1983

MEMORANDUM FOR FRED F. FIELDING

FROM: JOHN G. ROBERTS *JGR*

SUBJECT: Sign Language Interpreter
for Reagan Executive Forum

Becky Norton Dunlop and her aide John Hilboldt approached me at 5:00 p.m. yesterday, to inquire if a sign language interpreter for deaf persons must be provided at the Reagan Executive Forum at 1:00 p.m. today. One of the invitees to the Forum, a Reagan-appointed member of the Council on the Handicapped, is deaf, and requested an interpreter who would consistently mouth the presentations. Dunlop has no problem providing one (who would sit with the individual and not on stage), and the individual is reportedly content with such an arrangement. In the course of securing an interpreter for this purpose, however, Dunlop was advised by the Department of Education (source of interpreter) that an on-stage "signer" was required for the Forum, since it was a public meeting.

I talked with both Brad Reynolds and his Special Counsel for discrimination against the handicapped, Mark Disler. Both advised that they were aware of no legal requirement that there be a signer at the Forum. Disler recommended against providing one, for the precedent it would set; Reynolds said it was entirely up to the White House.

Since the rumored legal requirement originated with Education, I also checked with Dan Oliver (not the source of the rumor), who advised that an interpreter should be provided for deaf employees under 29 U.S.C. § 791, but that the interpreter need not be on stage. He suggested signs (or, oddly, an announcement) advising the deaf that an interpreter was available at a given area. I asked Oliver if anything need be done beyond responding to requests from deaf employees, and he said no. Since the only inquiry in this regard has come from the Council on the Handicapped member, and his request has been met, I do not see any need for any further action, and have so advised Dunlop. Incidentally, I do not agree with Oliver's reading of 29 U.S.C. § 791 to require interpreters for the deaf. That section establishes an Interagency Committee "to insure that the special needs of [handicapped employees] are being met." It does not itself impose any legal requirements for federal programs.

MEMORANDUM

OFFICE OF THE VICE PRESIDENT
WASHINGTON

February 25, 1983

MEMORANDUM TO CRAIG FULLER

FROM: C. Boyden Gray *CBG*

RE: 504 Handicapped Regulations

3/3 Copy:

*not sure -
was to clear w/AG*

FEB 25 1983

*To John Reynolds
lets discuss
ASAP.*

RHJ

*file:
Handicapped
Regulations*

Brad Reynolds is determined to publish and hold a series of hearings on proposed changes to the 504 handicapped regulations notwithstanding (1) the potential public backlash from handicap groups, and (2) the likely absence of any public support from any other sector.

It is difficult to assess how much adverse publicity the proposals will generate. Reynolds believes the changes themselves do not justify broad protest, and he is undoubtedly correct as a matter of law. But the handicap groups will use the 504 hearings as a forum for attacking the Administration on a number of related issues over which Reynolds has no control, such as 94-142 (Secretary Bell's controversial handicapped education rules), the Grove City case, "Baby Doe," and OMB Circular A-122. (The 94-142 groups have been sufficiently vocal to stop White House efforts to block-grant 94-142 for two years.)

It is also difficult to predict how little support there will be. But the major, big dollar-saving reforms have already been achieved at the agency level and in court (in transportation and construction), and the proposed changes will not as a practical matter do much more than make the rules more readable and understandable.

Accordingly, while OMB, OPD and OVP approve of the proposals as a matter of law and policy, they all believe that the issues raised by the proposals are predominantly political and that a decision on whether to go forward with the proposals is a political one. (It should be added that unlike most organized minority groups, the handicapped are not predominantly attached to the Democratic party and tend to support Republicans more than Democrats; the pro-life groups are, of course, strong Administration supporters.)

Congressman Michel, who is strongly opposed to the changes, is prepared to call the Attorney General or Reynolds if the White House will not undercut him. Reynolds, on the other hand, says the Attorney General feels strongly enough to see the President on the issue.

cc: Ed Harper
Jim Cicconi
Dick Hauser ✓