

PROGRAM ACCESS: NON-STRUCTURAL EVALUATION CHECKLIST

THE FOLLOWING CHECKLISTS ARE PROVIDED TO ASSIST PROGRAM MANAGERS AT GSA IN EVALUATING NON-STRUCTURAL PROGRAM ACCESS FOR INDIVIDUALS WITH DISABILITIES.

NON-STRUCTURAL ACCESSIBILITY: GENERAL OBLIGATIONS

QUESTION	REFERENCE	YES OR NO N/A	COMMENT
1. HAS THE PROGRAM STAFF THAT DEALS WITH THE PUBLIC RECEIVED DISABILITY AWARENESS TRAINING?	RECOMMENDED BY OCR		
2. ARE THERE ANY POLICIES OR PROCEDURES THAT WOULD LIMIT THE PARTICIPATION OF OR DENY ACCESS TO INDIVIDUALS WITH DISABILITIES?	41 CFR §105-8		
3. ARE THERE ANY POLICIES OR PRACTICES THAT WOULD RESULT IN AN INDIVIDUAL WITH DISABILITIES RECEIVING LESSER OR DIFFERENT BENEFIT/SERVICE THAN A PERSON WITHOUT A DISABILITY?	41 CFR §105-8		

NON-STRUCTURAL ACCESSIBILITY: GENERAL OBLIGATIONS

QUESTION	REFERENCE	YES OR NO N/A	COMMENT
4. IS PROGRAM STAFF REQUIRED TO REQUEST SUPERVISORY APPROVAL PRIOR TO DECLINING A REQUEST FOR ASSISTANCE FROM AN INDIVIDUAL WITH DISABILITIES?	OCR RECOMMENDS ONLY SUPERVISORY STAFF SHOULD MAKE DECISION TO DECLINE A REQUEST FOR ASSISTANCE.		
5. IS THE STAFF AWARE OF THEIR RESPONSIBILITY TO MAKE REASONABLE MODIFICATIONS TO POLICIES AND/OR PROVIDE ALTERNATIVE ASSISTANCE?			
6. HAS THE STAFF BEEN TRAINED OR INSTRUCTED UNDER WHAT CONDITIONS OR SITUATIONS THAT MODIFICATIONS AND/OR ASSISTANCE MAY BE REQUIRED IN ORDER TO PROVIDE MEANINGFUL ACCESS TO INDIVIDUALS WITH DISABILITIES?			

QUESTION	REFERENCE	YES OR NO N/A	COMMENT
7. ARE THERE ANY INSTANCES WHEN MEMBERS OF THE PUBLIC WITH DISABILITIES ARE PROVIDED SERVICES/ASSISTANCE SEPARATE FROM OTHERS? ¹ (I.E., SEGREGATED)			
8. HAS YOUR PROGRAM NOTIFIED CONTRACTORS OF SERVICES TO THE PUBLIC THAT THEY ARE OBLIGATED TO COMPLY WITH YOUR LEVEL OF RESPONSIBILITY UNDER SECTION 504 OF THE REHABILITATION ACT OF 1973, AS AMENDED?			
9. HAS THE PROGRAM STAFF RECEIVED INSTRUCTION ON THE REQUIREMENT TO ALLOW INDIVIDUALS WITH DISABILITIES WITH SERVICE ANIMALS IN THE SAME AREAS THAT THOSE WITHOUT DISABILITIES ARE ALLOWED?			

¹ Services must be provided to people with disabilities in the most integrated setting appropriate.

QUESTION	REFERENCE	YES OR NO N/A	COMMENT
10. HAS THE PROGRAM STAFF BEEN INSTRUCTED TO KEEP THE ROUTE OF TRAVEL CLEAR OF OBSTRUCTIONS AND TO REPORT ANY LOOSE FLOORING/CARPETING IMMEDIATELY TO BUILDINGS MANAGEMENT?			
11. DOES THE PROGRAM HOLD OFF-SITE MEETINGS, CONFERENCES OR OTHER TEMPORARY EVENTS?			
12. IF SO, DOES THE STAFF ENSURE THAT THE LOCATION AND SITE IS ACCESSIBLE FOR INDIVIDUALS WITH DISABILITIES?			

EFFECTIVE COMMUNICATIONS REFER TO THE WAY INFORMATION IS RECEIVED AND TRANSMITTED. SECTION 504 AND 41 CFR §105-8 REQUIRE THE PROVISION OF AUXILIARY AIDS AND SERVICES TO FACILITATE MEANINGFUL ACCESS BY INDIVIDUALS WITH DISABILITIES. THESE ARE DEVICES THAT CAN ACCOMMODATE A PERSON WITH A COMMUNICATION DISABILITY, SUCH AS A HEARING IMPAIRMENT, A VISUAL IMPAIRMENT, OR A SPEECH/LANGUAGE PROBLEM.

AUXILIARY AIDS AND SERVICES INCLUDE QUALIFIED SIGN LANGUAGE INTERPRETERS AND COMMUNICATION DEVICES FOR PERSONS WHO ARE DEAF OR HARD OF HEARING; QUALIFIED READERS, TAPED TEXTS, BRAILLE OR OTHER DEVICES FOR PERSONS WHO ARE BLIND OR WITH VISUAL IMPAIRMENTS; ADAPTIVE EQUIPMENT OR SIMILAR SERVICES AND ACTIVITIES FOR INDIVIDUALS WITH OTHER COMMUNICATION DISABILITIES.

PREFERENCE SHOULD BE GIVEN TO THE INDIVIDUAL'S PREFERRED METHOD OF AUXILIARY AID OR SERVICE. HOWEVER, IN THE EVENT THE PREFERRED METHOD IS UNAVAILABLE OR CANNOT BE PROVIDED, PROGRAM MANAGERS MUST ENSURE THAT THE SELECTED METHOD PROVIDED IS EFFECTIVE. GSA LANGUAGE SERVICES SCHEDULE MAY BE HELPFUL IN LOCATING A VENDOR TO PROVIDE AN AUXILIARY AID OR SERVICE.

NON-STRUCTURAL ACCESSIBILITY: EFFECTIVE COMMUNICATIONS

QUESTION	REFERENCE	YES OR NO N/A	COMMENT
1. CAN INFORMATION THAT IS COMMUNICATED VISUALLY (BROCHURES, ENROLLMENT FORMS, HANDBOOKS, VIDEOTAPES, FLIP CHARTS, SLIDES, POSTERS, PRINTED DIRECTIONAL SIGNS, AND SO FORTH) BE PROVIDED IN AN ALTERNATE FORMAT, IF REQUESTED?	41 CFR §105-8		

QUESTION	REFERENCE	YES OR NO N/A	COMMENT
2. CAN INFORMATION THAT IS COMMUNICATED VERBALLY BE PROVIDED IN ALTERNATE FORMAT, IF REQUESTED?			
3. DOES THE PROGRAM INFORM PARTICIPANTS/MEMBERS OF THE PUBLIC WITH DISABILITIES THAT AUXILIARY AIDS AND SERVICES ARE PROVIDED UPON REQUEST?			
4. IS THERE A PROCEDURE ESTABLISHED FOR STAFF TO REFER TO OBTAIN/ARRANGE FOR AUXILIARY AIDS AND SERVICES IN A TIMELY MANNER?			
5. CAN AN INDIVIDUAL WITH A HEARING OR SPEECH IMPAIRMENT ACCESS A TTY/TDD PHONE SYSTEM AT YOUR PROGRAM SITE? ²			
6. IF SO, HAVE STAFF MEMBERS BEEN TRAINED ON HOW TO USE THE EQUIPMENT?			

² A TDD/TTY (text telephone) is a device that allows individuals with hearing or speech impairments to communicate over the telephone.

QUESTION	REFERENCE	YES OR NO N/A	COMMENT
7. IF YOUR PROGRAM DOES NOT HAVE TTY/TDD, DOES YOUR STAFF KNOW HOW TO USE THE FEDRELAY SERVICE AND THE TELEPHONE NUMBER?			
8. IS THERE A MECHANISM FOR ENSURING THAT INDIVIDUALS WHO ARE DEAF OR HEARING IMPAIRED ARE AWARE OF AN ACTIVATED FIRE OR SMOKE ALARM?			
9. DOES YOUR PROGRAM HAVE IT'S OWN WEB PAGE?			
10. IF SO, IS IT ACCESSIBLE?			
11. DOES YOUR PROGRAM USE VIDEOS IN OUTREACH ACTIVITIES, MEETINGS OR EVENTS DEALING WITH THE PUBLIC?			
12. IF SO, ARE THEY CLOSED CAPTIONED?			

PROGRAM ACCESS: LIMITED ENGLISH PROFICIENCY

Executive Order 13166 requires Federal executive agencies to take reasonable steps to provide meaningful access to federally conducted programs and activities for individuals with Limited English Proficiency (LEP).

QUESTION	REFERENCE	YES OR NO N/A	COMMENT
1. HAS THE FOUR-FACTOR ANALYSIS BEEN CONDUCTED TO DETERMINE WHETHER SOME FORM(S) OF LEP ASSISTANCE IS REQUIRED IN ORDER TO PROVIDE MEANINGFUL ACCESS TO LEP INDIVIDUALS?	EXECUTIVE ORDER 13160 & GSA'S OFFICE OF CIVIL RIGHTS HANDBOOK, "THE KEY TO ACCESSING FEDERALLY CONDUCTED PROGRAMS AND ACTIVITIES"		
2. DID THE FOUR-FACTOR ANALYSIS CONCLUDE A FINDING THAT SOME FORM(S) OF LEP ASSISTANCE IS REQUIRED?			
3. IF YES, HAVE THE NECESSARY PROCESSES, PROCEDURES AND PRACTICES BEEN PUT IN PLACE?			
4. IF YES, HAS THE STAFF BEEN TRAINED OR INSTRUCTED ON THE LEP PROCEDURES?			
5. ARE PROCEDURES IN PLACE TO MONITOR THE EFFECTIVENESS OF LEP ASSISTANCE TO DETERMINE WHETHER ADJUSTMENTS NEED TO BE MADE?			