



Coastal Plains

Community Center

ADA Plan

Revised for FY 2021

****Please post in each service site on community bulletin board(s)***

For more information, questions, or concerns, please contact:

Mark Durand, Risk Manager

361-777-3991

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Self-Evaluation Checklist

Date September 14, 2020

Person completing this form:

Mark Durand **Risk Management Officer - ADA Coordinator**
Name Title

Risk Management **(361) 777-3991**
Department Phone Number

Program, Activity or Service: **Coastal Plains Community Center**

A. List of People Consulted

1. Planning:

- a. Mark Durand – Executive Director
- b. Leo Trejo – Director of Integrated Health Services
- c. Amy Welch – Director of IDD Provider Services
- d. Joel Perez - Director of IDD Authority Services
- e. Theresa Guerra – Director of Authority Functions
- f. Jonathan Heyward - Director of Quality Management/Privacy Officer
- g. Mark Durand - Risk Management Director
- h. Amy Stratton – Rights Officer

2. Site Inspection:

- a. MH Clinic Directors
 - 1) Linda Ramos-Perez – Director of Children's BH Services
 - 2) Roy Camacho – Beeville & George West Annex
 - 3) Joel Johnson – Alice
 - 4) Jorge De Los Santos– Rockport & Aransas Pass Annex
 - 5) Russell Weir – Taft
 - 6) Mary Zavala – Kingsville, VA Program
 - 7) Celina Utley - Falfurrias
- b. Coordinator of Dayhab Services (CODS):
 - 1) Amy Welch – Beeville & Taft
 - 2) Derrick Martinez – Kingsville & Alice
- c. IDD Waiver Services (HCS, TxHmL) - Ruben Garcia – Director
- d. YES Waiver Services - Yolanda Cruz – Program Manager
- e. Integrated Health (1115 Waiver) – Christine Johnson - Project Coord
- f. TCOOMMI – Stephanie McCoy – Director
- g. System of Care – Linda Madrigal – Program Manager

**B. Document Preparation: Mark Durand - Director of Risk Management
Jonathan Heyward – Director of Quality Management**

C. Implementation: Mark Durand – Director of Risk Management

D. Participation of Disabled Persons

List steps taken to ensure that disabled persons (or their representatives) participate in the completion of this self-evaluation.

The Center utilizes two methods of obtaining customer satisfaction information (*please note: All persons receiving services have a disability as defined by ADA*) related to services and accessibility.

The Consumers are all provided a “Consumer Rights” handbook at admission and are informed of the accessibility of the Rights Officer. The Rights Officer notifies the Director of Risk Management of any complaints regarding accessibility immediately. There were no complaints made to the rights office over the past 5 years.

This plan will be submitted to the Planning and Network Advisory Committee, which is a group constituted by stakeholders (consumers, family members and community members) for review and approval, prior to submission to the Board of Trustees.

E. Nature of Program

Describe, in general, the nature of the program, including its purpose, scope, general activities and participants.

Coastal Plains Community Center provides services to persons residing in a nine county geographic service area. The primary consumers of Mental Health Services are those persons identified as priority and target population by HHSC. The primary consumers of Intellectual and Developmental Disability Services are persons identified as having a diagnosis of Intellectual and Developmental Disability as defined by HHSC. For details, refer to the performance contracts for details and eligibility criteria.

Mental Health Services include:

Intake and Assessment

Case Management

Outpatient Psychiatric Services for Adults and Children

Skills Training and Psychosocial Rehab Services

Supported Housing & Employment Services

Crisis Hotline, Assessments, & Stabilization

TCOOMMI Program - Offenders with Mental Illness Program

PASRR

Respite Services

System of Care

YES Waiver
 Youth & Family Services

1115 Waiver - Integrated Services include:

- Integrated Health Care*
- Integrated Substance Abuse*
- Navigator Services*
- Transportation Services*

Intellectual and Developmental Disability Services include:

- Intake & Assessment*
- Service Coordination*
- Home and Community-based Services*
- Texas Home Living Waiver Services*
- Day Habilitation*
- Community First Choice*
- Nursing Services*
- Speech/Language Services*
- Psychological Services*
- Respite Care Services*
- PASRR*

F. Recruitment and Advertisement

1. Does the public entity engage in any of the following activities to recruit program participants or otherwise inform persons of the program’s existence? If **no**, proceed to Item E.

The Center is prohibited from advertising for the purpose of soliciting additional external customers. The Center does engage in a public service and educational campaigns designed to inform the general public of the Center’s services and to provide a medium for first contact. The Center utilizes a multi-media approach to negate the impact of single sensory impairment.

Describe briefly activities involved and materials used.

Type of Activity	Steps take to ensure full participation of people with disabilities
Governance meetings	Board meetings are conducted in public buildings or Center buildings, which meet ADA accessibility requirements.
Brochure/Pamphlets	Statements regarding non-discrimination policy were added to the Center’s primary brochure. This includes information regarding assistance through Texas Relay (TTY Services) for people with hearing impairments. The majority of the agency pamphlets, brochures and informational material are also published in Spanish.
Public Service Announcements (PSA)	PSA’s are televised with closed caption option for hearing impaired.
Direct staff contact (face to face contacts)	Staff are trained to provide information about services in the language that the person understands. This includes reading materials for people who are unable to read; utilizing interpreters, as needed; assistance in completion of required documentation (including application for services); use of TTY; and home visits as needed.

2. Turn to section “H” (Outside Persons and Organizations) of this checklist. List there any “outside” persons and organizations involved in these recruitment, advertising or information efforts.
See: A through E of Section H

3. Turn to section “I” (Facilities Used). List there all facilities, and parts of facilities, used during recruitment and advertising efforts, including those not owned and/or operated by the public entity (e.g., leased or otherwise used). Are these facilities accessible? IF not, is information available in an accessible location?

See list Section I

G. Program Eligibility Requirements and Admission

1. Are any criteria or tests used in the admission process?

No Yes

If **no**, proceed to “7” below.

If **yes**, list and describe briefly all criteria (e.g., good health, residency requirements, letters of recommendation) and all tests (including the skill, level of achievement, or other factors being tested, whether they are written or oral tests, the method of administration) used in the admissions process, and indicate how they relate to the program.

In order to qualify for IDD services, persons must:

- (1) Demonstrate onset of symptoms prior to 18th birthday unless otherwise specified in the contract (e.g. autism spectrum disorders have specific age criteria).**
- (2) Have full scale IQ below 70 or demonstrate significant deficiencies in adaptive living**
- (3) DIDD - to establish eligibility**

In order to qualify for MH services, persons must:

- (1) Member of priority population (as defined by DSMV and/or HHSC)**

NOTE: For details on what the specific requirements for “priority population” refer to the Center’s Performance Contracts established by HHSC.

2. List all criteria and tests from “1” above that have (or could have) a disproportionate, adverse impact on disabled program applicants. Discuss briefly the (potential) negative impact for each.

Note: This criterion is utilized to establish disability and does not have a disparate effect.

3. For each criterion or test listed in “2” above that you design and administer, discuss briefly **alternative** criteria or tests that will be used to ensure non-discrimination. This could include, in limited instances, not using a criterion or test.

N/A

4. For each item listed in “3” above that is designed and/or administered by an “outside” person or organization, list steps to modify any criterion or test that has a (potential) disproportionate, adverse impact on disabled persons, or class(es) of disabled persons (possibly including, in limited instances, not using a criterion or test).

N/A

5. List steps to make potential program participants, including those with hearing and vision impairments and learning disabilities, aware of alternative testing and criteria.

Assessments are conducted by trained/licensed staff, which negates the negative impact of disabilities. As previously stated, these assessments are conducted to establish disability which then qualifies individuals for services. Intake staff is trained to utilize alternative testing/assessment tools to accommodate various disabilities (and to utilize interpretive services necessary to obtain information).

6. Is an interview required before an applicant enters the program?

No

Yes

If **no**, proceed to “7” below.

If **yes**, discuss briefly the interview process and list steps to be taken (including the provision of auxiliary aids, as required) to ensure non-discrimination in interviewing.

Interviews are for the purpose of assessment to include identification of disabilities as a justification for program services. Assistance is available for the purpose of providing interpretive services.

7. Are any forms required for admission in the program testing or submission or other admissions criteria?

No

Yes

If **no**, proceed to “10” below.

If **yes**, what are the forms, and are any available in alternative formats (e.g., taped, Braille, reader)?

Staff complete all forms.

8. List steps to provide admission forms in alternative formats.

Staff are available as reader. Staff complete complete applications for consumers.

9. Do the forms listed in “7” above contain a notice of your organization’s compliance with the ADA?

No

Yes

If **no**, proceed to “10” below.

If **yes**, list steps to ensure the inclusion of notices of your compliance with the ADA in all materials.

Intake staff give advisory statements which makes potential consumers aware that specialized services are available for disabled persons to facilitate program entry (when being informed of their rights).

10. List steps to ensure applicants are not asked pre-admission inquires as to the nature and extent of a disability and that no forms or other written materials make mandatory inquiries related to disability.

This question is not applicable, as persons must demonstrate a disability to qualify for services. Persons who cannot demonstrate disabilities do not typically meet service requirements with the exception of crisis services.

11. Turn to section “J.” List there any “outside” persons and organizations involved in testing, collecting or evaluating admissions criteria.

None

12. Turn to section “K.” List there all facilities and parts of facilities used for testing, collecting or submitting forms and admissions criteria and other activities related to program eligibility requirements, including facilities not owned or operated by the public entity (e.g., leased or otherwise used).

See section I for detailed description of compliance issues by facility location.

H. Participation in the Program

1. Are post-admission inquires made regarding disabled status to make accommodations for disabled persons?

No

Yes

If **no**, proceed to “2” below.

If **yes**, list steps to ensure that information is gathered voluntarily, not used to affect any disabled person adversely and kept confidential.

(1) Employment

Information obtained during post hire inquiries is obtained to determine if applicant requires accommodations. This information is maintained in confidential personnel medical record.

(2) Services

All post-admission inquiries are designed to facilitate acquisition of services and eliminate barriers. This information is maintained in confidential client files.

2. Is there an orientation for new participants?

No

Yes

If **no**, proceed to “3” below.

If **yes**, describe briefly the orientation and materials used, and list steps to ensure effective communications and usable materials (in alternative formats) for all participants.

Staff provide program orientation. Multilingual and American Sign Language interpreters are available.

3. List below all written materials, tools, equipment or other aids or devices used for the program.

The programs assess consumer’s needs utilizing standardized assessment protocols such as: uniform assessments/TRRs, standardized psychological tests, etc. An application for service is completed which includes intake forms, financial statements, consent forms, medical and psychiatric histories, case management assessment, etc.

4. For each item in “3” above, list steps (e.g., the provision of auxiliary aids, equipment modification) to ensure that program materials and equipment are accessible and usable.

Alternate modalities are utilized for written and visual materials to include readers. Staff are available to make home visits thus negating any transportation needs.

5. Would any steps pose an undue financial or administrative burden?

No

Yes

If **yes**, list alternative methods of providing accessibility that would not impose an undue financial or administrative burden.

6. What elements or activities are included in the program (e.g., vocational services, music therapy, retirement services, activities of daily living, leisure skills training,

supported housing, supported employment, structured recreational and leisure outings, etc.)? **All of the above.**

7. For each element in “6” above, which ones are, or have the potential to be, inaccessible to disabled participants. Describe steps to make them accessible and usable (e.g., the provision of auxiliary aids, use of alternative materials or formats).

(1) Specialized transportation (wheelchair accessible vans with lifts and tie down straps).

(2) Specialized services based upon Individual Plans of Care (e.g. nursing, dietitian, psychological services, etc.)

8. Are any of the following services or benefits provided to program participants (unless already covered in “6” above)? If none is provided, proceed to “9”.

<input checked="" type="checkbox"/> Transportation Services	<input checked="" type="checkbox"/> Counseling Services
<input checked="" type="checkbox"/> Employment Services	<input checked="" type="checkbox"/> Health Services and Insurance/Benefits
<input checked="" type="checkbox"/> Housing	<input checked="" type="checkbox"/> Food Services
<input checked="" type="checkbox"/> Financial Aid	<input checked="" type="checkbox"/> Social, Recreational or Athletic Activities

List other services provided to program participants.

Medication Services

Nursing Services

Psychiatric Services

Case Management

Physician Services

List Steps to ensure that:

Service/benefit is equally effective for and usable by disabled persons;

Administration of service/benefit will be free from discrimination based on disability;

Communications will reach all persons (including those with hearing and sight impairments); and

Effective application procedures to receive the services exist for disabled persons (including those with hearing vision impairments).

It is the function of the interdisciplinary team to determine any specialized accommodations, which are required to maximize service utilization, assesses each person’s needs. The function of the service coordination/case management unit is to eliminate barriers to services for all recipients both internal and external to the Center. Where needed, readers and language interpretive services are available from the speech therapist unit.

9. List steps to ensure that information concerning program schedules and activities are effectively communicated to all program participants, including those with impaired vision and hearing.

The facility aggressively pursues program participation as this provides the basis of reimbursable services by:

- (1) Providing transportation to and from program sites.**
- (2) Providing case management to include linkage services.**
- (3) Conducting service satisfaction questionnaires designed to improve participant satisfaction.**
- (4) Ensuring that notification of scheduled services is provided both orally and in writing**

10. Are there boards, councils or similar bodies on which program participants sit?
 No Yes

If **no**, proceed to "11" below.

If **yes**, list steps to ensure equal opportunities for selection to, and participation in such boards by disabled persons.

Representation within these governing bodies requires consumer/disabled participants or family members/guardians which represent the disabled party.

11. Turn to section "H". List there any "outside" persons or organizations involved in any aspect of the program.
12. Turn to section "I". List there all facilities, and parts of facilities, used during the program, including those not owned and/or operated by the recipient (e.g., leased or otherwise used).
13. Are each of these facilities accessible to people with disabilities, including people who use wheelchairs? If not, is the program, "when viewed in its entirety, "accessible"?

No Yes

If **no**, what steps will be taken to make it accessible? (If structural changes are necessary for building the public entity owns or operates, this should be documented in the transition plan.)

See transition plan.

I. Staff Information

List steps to ensure that all staff involved in this program (e.g., recruitment, admission, testing, the conduct of the program, the provision of any services or benefits) will be informed periodically of, and understand fully, your policy of non-discrimination on the basis of disability.

(1) Staff are informed at the time of employment of the agency's policy regarding ADA accommodation.

(2) Staff receive periodic (annual and biannual) training which reaffirms the agency's participation.

(3) Contracts with providers include the requirement not to discriminate.

J. "Outside" Persons and Organizations

1. List below all "outside" persons and organizations that are involved in the provision of any aid, benefit or service for the program (as discussed in sections "C" through "E" above).

Contracted Services:

Contracts & Procurements ~ Providers

Physicians:

Umamaheswara Maruvada, MD

Krishnaiah Rayasam, MD

Murthy Mangipudi, MD

Psychiatric Hospitals:

Palms Behavioral Health Hospital, Harlingen, TX

Bayview Behavioral Health Hospital, Corpus Christi, TX

South Texas Behavioral Hospital, Edinburg, TX

Doctor's Hospital at Renaissance, McAllen TX

Crisis Hotline:

Avail Solutions

Crisis Rehabilitation Services:

Avail Solutions

Pharmacy and Authorization Services:

East Texas Behavioral Healthcare Network

Substance Abuse Services:

United Connections Counseling

Peer Providers:

2 providers

Family Partners:

2 family partner

Host Home Providers:

30 host home providers

Supported Home Living/ Respite Providers:

48 providers

2. List steps to **inform** those listed in "1" above of your organization's commitment to non-discrimination on the basis of disability. Remember that the non-discrimination mandate extends to the awarding of procurement contracts.

Each contract includes the statements that require the contractor not to discrimination on the basis of disability.

3. List those persons and organizations from “1” above that receive “significant assistance” from your organization in the provision of aids, benefits or services to your program participants. (For example, list organizations which rent or otherwise use your facilities; that depend on your organization for informing its participants of the aid, benefit or service; that have employees of your organization spending time to assist in or coordinate the provision of the aid, benefit or service; and so forth.)

NONE

4. List steps to ensure that persons or organizations listed in “3” above do not discriminate on the basis of disability in the provision of any aid, benefit or service to your program participants. (such steps may include changes in the program, facility alternation, and/or changes in or discontinuation of the relationship.)

N/A

I. Facilities Used

(NOTE: The definition of “facility” under the ADA includes all or any portion of buildings, structures, equipment, roads, walks, parking lots or other real or personal property or interest in such property, owned, operated or leased.)

1. List below all facilities, or portions of facilities, used for the activities covered in sections “D” through “F” above, designating for each the activity for which it is used. (NOTE: Facilities leased or otherwise used from another person or organization should be included.)

(a) Taft Clinic

IDD Services: Services for people diagnosed with Intellectual and Developmental Disability Services or other qualifying developmental delays. Includes Service Coordination and the adult day habilitation program, which is fully accessible. Training is provided on daily living skills with an emphasis on community inclusion. Specialized adaptive equipment for transporting and communicative purposes available. Specialized therapeutic approaches include: speech therapy and vocational therapy.

MH Services: Adult and Children’s Mental Health Clinic provides psychiatric services to persons meeting the HHSC defined MH Population. Fully accessible program – with majority of services provided in vivo. Case Management, supportive housing, supportive employment, Psychosocial Rehabilitation Program and ACT Alternative services provided.

(b) Rockport Clinic

IDD Services: Services for people diagnosed with Intellectual and Developmental Disability Services or other qualifying developmental delays. Includes Service Coordination and the adult day habilitation program, which is

fully accessible. Persons with intellectual disabilities in Aransas County receive services at home or in the Taft clinic (dayhab). Transportation is provided on a daily basis during days of operation both ways. Training is provided on daily living skills with an emphasis on community inclusion. Specialized adaptive equipment for transporting and communicative purposes available. Specialized therapeutic approaches include: speech therapy and vocational therapy.

MH Services: Adult and Children's Mental Health Clinic provides psychiatric services to persons meeting the HHSC defined MH Population. Fully accessible program – with majority of services provided in vivo. Intake and Assessment, Case Management, Medication Clinic, Supportive Housing, Supportive Employment and Psychosocial Rehabilitation Program provided.

(c) Aransas Pass Clinic

IDD Services: Services for people diagnosed with Intellectual and Developmental Disability Services or other qualifying developmental delays. Includes Service Coordination and the adult day habilitation program, which is fully accessible. Persons with intellectual disabilities in Aransas Pass/San Patricio County receive services at home or in the Taft clinic (dayhab). Transportation is provided on a daily basis during days of operation both ways. Training is provided on daily living skills with an emphasis on community inclusion. Specialized adaptive equipment for transporting and communicative purposes available. Specialized therapeutic approaches include: speech therapy and vocational therapy.

MH Services: Adult and Children's Mental Health Clinic provides psychiatric services to persons meeting the HHSC defined MH Population. Fully accessible program – with majority of services provided in vivo. Intake and Assessment, Case Management, Medication Clinic, Supportive Housing, Supportive Employment and Psychosocial Rehabilitation Program provided.

(d) Beeville/George West Clinic

IDD Services (Beeville only): Services for people diagnosed with Intellectual and Developmental Disability Services or other qualifying developmental delays. Includes Service Coordination and the adult day habilitation program, which is fully accessible. Training is provided on daily living skills with an emphasis on community inclusion. Specialized adaptive equipment for transporting and communicative purposes available. Specialized therapeutic approaches include: speech therapy and vocational therapy.

MH Services (Beeville and George West): Adult and Children's Mental Health Clinic provides psychiatric services to persons meeting the HHSC defined MH Population. Fully accessible program – with majority of services provided in vivo. Case Management, supportive housing, supportive employment, Psychosocial Rehabilitation Program and ACT Alternative services provided.

(e) Alice MH Clinic

Adult and Children's Mental Health Clinic provides psychiatric services to persons meeting the HHSC defined MH Population. Fully accessible program – with majority of services provided in vivo. Intake and Assessment, Service Coordination, Medication Clinic and Assertive Community Treatment (ACT) Alternative services. Psychosocial Rehabilitation Program, Supported

Employment and Supportive Housing services provided from a fully accessible site.

(f) Alice IDD Center

Services for people diagnosed with Intellectual and Developmental Disability Services or other qualifying developmental delays. Includes Service Coordination and the adult day habilitation program, which is fully accessible. Training is provided on daily living skills with an emphasis on community inclusion. Specialized adaptive equipment for transporting and communicative purposes available. Specialized therapeutic approaches include: speech therapy and vocational therapy.

(g) Falfurrias Clinic/Center

IDD Services: Services for people diagnosed with Intellectual and Developmental Disability Services or other qualifying developmental delays. Includes Service Coordination and the adult day habilitation program, which is fully accessible. Persons with intellectual disabilities in Brooks County receive services at home or in the Alice clinic (dayhab). Transportation is provided on a daily basis during days of operation both ways. Training is provided on daily living skills with an emphasis on community inclusion. Specialized adaptive equipment for transporting and communicative purposes available. Specialized therapeutic approaches include: speech therapy and vocational therapy.

MH Services: Adult and Children's Mental Health Clinic provides psychiatric services to persons meeting the HHSC defined MH Population. Fully accessible program – with majority of services provided in vivo. Service Coordination, supportive housing, supportive employment and ACT Alternative services provided.

(h) Kingsville Clinic/Center

MH Services: Adult and Children's Mental Health Clinic provides psychiatric services to persons meeting the HHSC defined MH Population. Fully accessible program – with majority of services provided in vivo. Intake and Assessment, Case Management, Medication Clinic, Supportive Housing, Supportive Employment and Assertive Community Treatment (ACT) program services provided. The Psychosocial Rehabilitation Program, Supported Employment and Supportive Housing services are also provided out of this building.

IDD Services: Services for people diagnosed with Intellectual and Developmental Disability Services or other qualifying developmental delays. Includes Service Coordination and the adult day habilitation program, which is fully accessible. Training is provided on daily living skills with an emphasis on community inclusion. Specialized adaptive equipment for transporting and communicative purposes available. Specialized therapeutic approaches include: speech therapy and vocational therapy.

(i) Portland Office

Administrative: Administrative headquarters includes Service Directors, Authority functions, purchasing, data entry, and some MH and IDD services program managers.

IDD Waiver Services: Headquarters for the HCS, TxHmL and Community First Choice waiver programs for people diagnosed with Intellectual and Developmental Disability Services or Pervasive Developmental Disorders.

YES Waiver: YES Waiver program headquarters serving children 3-18 years of age with behavioral health diagnosis who are a high risk of out-of-home placement or hospitalizations through case management, skills training, therapies.

2. (A) Using the Texas Accessibility Standards and the ADA Accessibility Guidelines, list below for each facility (or portion thereof) inaccessible feature that limits program accessibility but which can be addressed by means other than structural changes. For each feature, list non-structural measures that will be taken to ensure accessibility when the program is “viewed in its entirety,” including:
- Relocating the activity to accessible space,
 - Being able to relocate the activity to accessible space, upon notice of the needs of a qualified disabled person,
 - Revising the structure or format of the activity so the space is not needed,
 - Modifying or redesigning equipment;
 - Making home visits or other alternative delivery services; or
 - Otherwise achieving program accessibility; and
 - The time frame for compilations of each correction.

Site	Accessibility Issue	Action to take	Estimated Completion Date	Actual Completion Date

- (B) If non-structural changes cannot achieve program accessibility, place the feature on your transition plan for necessary structural changes (see Section “L”). **Responsible parties: Mark Durand, Executive Director and Risk Management Specialist.**

Plan of Action/Plan of Correction – by Site

Site #	Site	Accessibility Issue(s)	Action to be taken	Estimated Completion Date	Actual Completion Date
1					
2					
3					
4					
5					

6					
7					
8					

- List steps to ensure that all future construction and renovation work will comply with the architectural and accessibility standards (exclude projects managed by Central Office Maintenance and Construction).

All contracts for facilities will refer to the “Texas Accessibility Standards” as the construction standard for ADA reference.

- List steps to ensure periodic communications with (potential) disabled program participants concerning accessible and inaccessible facilities.

All program participants by definition are disabled. Service Coordinators and other staff make participants aware of accessibility issues to include accessible restroom (toilet) facilities.

- Is the facility in question considered “historic” (e.g., is it either on the National Register of Historic Places or on a state or local list of historic places)?

No Yes

If **yes**, list steps to ensure program accessibility, including any structural changes. If structural changes would compromise the historic value, list alternative methods to ensure program accessibility. (Note: Only those programs that uniquely concern the preservation and experience of the historic property itself are covered by this exemption. If the program held at a historic facility is not a “historic preservation” program, it must be relocated if structural accessibility is not possible.)

J. Employment

- List safeguards in place to ensure that all employment decisions are made without discrimination on the basis of disability, and that such decisions do not limit, segregate or classify applicants or employees based on disability in a way that adversely affects their employment opportunities or status.

- (a) All position vacancies are posted and advertised in countywide publication, job phone line for non-sighted potential applicants.**
- (b) Interviews conducted with prepared questions, which are reviewed by HR prior to interviews for EEO issues.**
- (c) Staff are trained in proper interview techniques to include ADA issues involving selection process.**

- Are you participating in a contractual or other arrangement or relationship that subjects qualified applicants or employees with a disability to discrimination (i.e., relationships with employment or referral agencies, labor unions, or organizations that provide fringe benefits, training, or apprenticeship programs)?

No

Yes

If **yes**, list steps to be taken to ensure non-discrimination in the future.

3. Analyze the following aspects of employment to make certain that no discrimination based on disability exists (including discrimination which occurs due to an inaccessible facility):

Recruiting, advertising and processing applications for employment; **NONE**

Hiring, upgrading, promotion, award of tenure, demotion, transfer, layoff, termination, right of return from layoff, and rehiring; **NONE**

Rates of pay or another form of compensation and changes in compensation; **NONE**

Job assignments, job classifications, organizational structures, position descriptions, lines of progression, and seniority lists; **NONE**

All forms of leave; **NONE**

Equal benefits and privileges available by virtue of employment, whether or not administered by the recipient; **NONE**

Selection and financial support for training, including apprenticeship, professional meetings, conferences and other related activities, and selection for leaves of absence to pursue training; **NONE**

Employer-sponsored activities, including social and recreational programs; **NONE** and,

Any other term, condition or privilege of employment. **NONE**

4. Do you have a policy concerning "reasonable accommodation" that specifies the decision making process for identifying, arranging for and/or paying for, and determining undue hardship for reasonable accommodation?

No

Yes

If **no**, list steps to be taken to establish a reasonable accommodation policy.

Coastal Plains Community Center will abide by the established Texas Administrative Code and HHSC's policy regarding accommodations for disabled employees.

5. What employment tests or criteria are used for evaluating potential employees? Describe procedures to ensure that these criteria or tests do not discriminate against disabled persons, unless they are shown to be consistent with job necessity and are directly related to the essential functions of the position.

(a) Criminal records - no adverse impact

(b) Drug screening - no adverse impact

(c) Interview and selection process consistent with HHSC methodology - no adverse impact

(d) CANRS - no adverse impact

(e) Driving History - job necessity

6. Describe methods to identify the job-related characteristics of tests and criteria used in employment decisions.

(a) Job analysis identifies essential and non-essential job tasks.

(b) Test and interview methodology related directly to position description and identified essential elements.

7. Describe steps to ensure that no pre-employment inquiries are made as to whether ran applicant is a disabled person or as to the nature or severity of a disability. (Inquires related to one's ability to perform the essential functions of a job effectively and safely are permitted.)

(a) Application contains no pre-offer inquiries.

(b) All interrogatories approved by Human Resources EEO officer.

(c) All interrogatories related specifically to essential elements of position description.

8. Does your organization conduct or require any medical exams or physical capacity assessments prior to making final offers of employment?

No

Yes

If **yes**, describe procedures to ensure that a) **all** entering employees are subject to medical exams, b) all offers of employment are conditional based on the results of the exams, c) the medical results gathered are not used in a discriminatory manner, and d) all information gathered is kept confidential. Pre-employment medical examination before conditional job offers are not permitted.

9. Review job application forms and interview questions to ensure that applicants are not asked about the existence of (or nature of severity of) a disability. You are allowed to inquire about the candidate's ability to perform job functions. Ensure that applicants are not asked about their relationship or association with a disabled individual.

Such review is conducted by Human Resources EEO officer prior to interview by hiring authority.

10. Review the essential and marginal functions of existing positions descriptions for each position in your organization for use in determining what makes applicants "qualified" and what job accommodations can be made when necessary for an applicant or employee.

Each position description is based on job analysis, which identifies essential and nonessential functions of the position. Requests for accommodations are reviewed on an individual basis with determinations made based on cost and facility's ability to provide the requested accommodation.

11. Describe the process used to determine the essential and marginal tasks of positions descriptions in your organization and the process for ensuring that position descriptions are kept current.

Each job posting requires a review by the hiring authority. New positions require job analysis. Positions are updated as functions are modified or changed.

K. Communications

1. Provision of Auxiliary Aids

List auxiliary aids that are available (or sources where they can be obtained) for individuals with speech, vision or hearing impairments. This can include qualified readers and interpreters, taped, brailled or large-print materials, or closed-captioned video programs.

- a) Readers**
- b) Interpreters**
- c) Phone access for vision impaired**
- d) Written materials**
- e) Specialized communication devices such as light talkers, etc.**
- f) Sign Language services for people with hearing impairments**

2. Are auxiliary aids provided to individuals with hearing, speech or vision impairments when needed to ensure effective participation in a program or activity? If no, list steps to ensure that auxiliary aids are provided to overcome communication barriers.

Yes - Specialized therapy providers assess individual needs to ameliorate disabilities.

3. Telecommunication Devices for the Deaf

Does the public entity provide services or information to the general public over the telephone?

No

Yes

If **yes**, is a telecommunication device for the deaf (TDD) or other equally effective system available so that public entities can communicate with hearing-impaired and speech-impaired individuals?

No

Yes

If **no**, list steps to ensure effective communications with hearing-impaired and speech-impaired individuals. This can include providing a TDD or relying on a third-party relay service. Note: The Justice Department encourages entities that have extensive phone contact with the public to have TDDs to assure more immediate access.

- a) The Center utilizes the TDD services available through Deaf Interpreter Services**

b) Coastal Plains Community Center has access to a web site, which will provide list of services, sites and accessibility information.

4. Information and Signage

Is information provided concerning the following? **Yes**

Signage at inaccessible entrances directing people to an accessible entrance or a location with information about an accessible entrance.

All sites have been reviewed for accessibility signage and individual site plans have been implemented to post accessibility signage. Coastal Plains will continue to use the A.D.A. inspection tool on a yearly basis to ensure signage remains posted.

Signage directing people to elevators and stairways:

Coastal Plains has no elevators or stairways

Signage concerning the availability and location of TDD equipped pay phones or portable TDD's.

Coastal Plains is posting Information Brochures providing user information about "Relay Texas" services. Also, we have completed an Employee awareness training to address needs of hearing impaired persons.

Signage should comply with 4.30 of the Texas Accessibility Standards and the ADA Accessibility Guidelines.

See transition plan table beginning on pages 14 & 15 of this plan.