

## **Guidance on Developing an Access to Services Plan**

This exhibit is intended to assist you in assessing your facility to ensure that it is accessible and usable by persons with disabilities (PWD). An access policy and implementation plan needs to be incorporated into your organization's short and long-range planning. Compliance with Section 504 and the stipulations of the Americans with Disabilities Act (ADA) can be achieved in a variety of ways. For example, according to the Rehabilitation Act, Section 504, not every program or every floor needs to be accessible, but enough accessible programs or facilities must be provided so that PWD have an equal opportunity to benefit from the organization's program offerings, "when viewed in their entirety."

Access improvements should strive to go above and beyond the law. While every organization must develop plans to meet minimum access requirements, organizations may be creative in developing new strategies to include the 20 percent of Americans who have disabilities. Of course, maintaining and improving accessibility should be considered on a regular long-term basis. Experience has shown that when access to services, programs, activities and employment are given a high priority, it is reflected in an organization's mission statement, policies and guidelines.

Your Access to Services Plan may serve as partial documentation of your "good faith" efforts to comply with the ADA. You may want to consider forming an Access Advisory Committee to assist in developing your Access to Services Plan. The plan should reflect your organization's compliance with the law and the incorporation of these laws and regulations into all aspects of your organizational structure.

### **What a Self-Evaluation and Transition Plan Should Do**

- 1) Utilizing the accompanying checklist (Exhibit 4), identify all policy, employment, physical and programmatic barriers that limit access to the organization's facilities, service and programs. You may wish to consider involving individuals with disabilities to assist in this process.
- 2) Prioritize access improvements in policy, employment issues, facility, programs and services, with measurable goals and objectives. Identify readily achievable improvements first and then begin the process of planning for those requiring more long-range plans that involve extensive design and construction work. The ADA requires that places of public accommodation (for-profit and non-profit alcohol and drug programs) remove architectural barriers if such plans are "readily achievable" and can be accomplished without much difficulty or expense.
- 3) Develop a timetable with completion dates for steps necessary to achieve full accessibility.
- 4) Identify the person(s) responsible for the implementation of the plan.
- 5) Establish a time frame and review method for ongoing monitoring and assessment; for example, schedule subsequent accessibility reviews of your organization.

6. A copy of the plan should be available for public inspection. According to the Rehabilitation Act, Section 504, agencies and organizations receiving federal funds must have a copy of the plan available for public inspection.

### **Establishing Priorities for Your Access to Services Plan**

When developing an Access to Services Plan, the organization should develop its priorities and create a timetable for barrier removal on the basis of whether the improvement or removal of the barrier is: 1) readily achievable; 2) a recommended priority area by the Department of Justice (discussed in detail on the following page); and 3) incorporates principles of universal design to accommodate a diverse group of users of facilities.

### **Readily Achievable Improvements and Accommodations**

Your plans may include readily achievable improvements that address architectural barriers as well as the policies and practices of your cultural organizations. Examples of readily achievable improvements that can be made immediately, at no cost or inexpensively, include:

- Adding definitive access language to your policies and guidelines;
- Providing all agency publications on cued audio tapes or large print upon request;
- Publicizing the accessibility of your organization's activities and services;
- Conducting access training for staff and board;
- Establishing an office policy requiring accessible facilities for all agency activities;
- Installing a TTY, training staff to use it, and including the number where your organization's other phone numbers are listed;
- Compiling resource lists of availability and costs of accessible accommodations in your locality;
- Recruiting people with disabilities for grant review panels;
- Lowering display cases and counter tops;
- Installing large print labeling/signage;
- Removing fixed seating for wheelchair spaces; and
- Conducting periodic surveys of client/public accessibility needs.

A fact sheet from Adaptive Environments entitled ***Alternatives to Barrier Removal*** describes options for places of public accommodation when modifications are not readily achievable:

<http://www.adainfonet.org/adainfonet/documents/architecturalIndocuments/Alt%20to%20barrier%20removal.pdf>

## Recommended Priority Areas by the Department of Justice

The Department of Justice **Title III Technical Assistance Manual** recommends priority areas for the removal of barriers in existing facilities. Because the resources available for barrier removal may not be adequate to remove all existing barriers at any given time, the regulation suggests a way to determine which barriers should be dealt with first. The purpose of these priorities is to facilitate long term business planning and maximize the degree of effective access that will result from any given level of expenditure. These priorities are not mandatory. Businesses with public accommodations are free to exercise discretion in determining the effective “mix” of barrier removal measures to undertake in their facilities.

<http://www.usdoj.gov/crt/ada/taman3.html>

### **Priority 1:** *Get people in the door*

Enable individuals with disabilities to physically enter your facility. "Getting through the door" recognizes that providing physical access to a public facility from public sidewalks, public transportation or public parking is generally preferable to any alternative arrangements in terms of both business efficiency and the dignity of individuals with disabilities. Solutions include installing 12:1 grade ramps, widening entrances, and providing accessible parking spaces.

### **Priority 2:** *Provide access to goods and services*

Provide access to those areas of a place of public accommodation where goods and services are made available to the public. For example, individuals with disabilities should have access to assistance at the front desk, as well as to any other areas that are available to other individuals, such as group counseling rooms or recreational areas.

### **Priority 3:** *Provide access to restrooms*

If restrooms are provided for use, they should also be accessible to those with disabilities.

### **Priority 4:** *Remove any remaining barriers*

The remaining barrier removal efforts address amenities or services provided by the organization or facility.

## Universal Design Considerations

Whereas barrier-free design focuses on meeting the federal accessibility standards, the intent of universal design is to simplify life for everyone by making products and

environments usable by as many people as possible at little or no extra cost. Universal design for more inclusive and universally accessible environments includes:

1. Site design that is easily accessible from public transit, parking, and public pathways;
2. Entrances and how they are used; and
3. Signage systems that guide individuals through a facility.

### **Organizing Your Access to Services Plan**

Organize the results of the checklist, including the nondiscrimination questions, into a chart. The first sample chart attached (Sample 1) has five columns. The first column lists the identified barriers; the second column describes the method for eliminating the barriers; the third denotes the person or department responsible for barrier removal; and the fourth is the estimated project cost. The fifth column specifies the projected start and completion days. The other sample chart (Sample 2) illustrates a different method for organizing and preparing your plan.

### **Professional Assistance in the Development and Implementation of Access to Services Plan**

If for any reason during the development of your "Access to Services Plan" you encounter difficulty or want reassurance that your program is proceeding in the appropriate manner, there are additional options to assist you, at no charge:

1. Contact your County AOD Administrator and request assistance from the designated County Access Coordinator;

**OR**

2. Bob Olson, Disability Access Project Director  
2400 Marconi Avenue, Suite C  
P. O. Box 214127 (mail)  
Sacramento, CA 95821  
Phone: 916-338-9460  
TTY: 916-473-0836  
FAX: 916-338-9468  
Website: [www.caarr.org](http://www.caarr.org)  
E-mail: [bob@caarr.org](mailto:bob@caarr.org)

**OR**

3. You may also utilize the services of a paid ADA/504 consultant.

**SAMPLE 1**

| <b>Access to Services Plan: SAMPLE Treatment Center</b>    |   |   |  |                                   |
|--|---|---|--|-----------------------------------|
| <b>Element/Barrier</b>                                     | <b>Methods</b>  | <b>Responsible Person/Dept</b>                  | <b>Estimate</b>  | <b>Timeline Start/ Completion</b> |
| Doors  | Replace knobs with lever Hardware throughout.   | Facilities                                      | \$12,400   | 3/03 -5/04                        |
| Women's Restroom—No accessible stall                       | Combine 2 stalls to create a fully accessible one   | Facilities                                      | \$2,000  | 3/03 -3/04                        |
| Printed Material does not include information about access | <ul style="list-style-type: none"> <li>• Collect samples from other organizations</li> <li>• Acquire Disability Access Symbols</li> <li>• Consult with Access Committee regarding content and presentation</li> <li>• Work with Graphic Designer to Produce Prototypes</li> </ul> | Visitors Services and Accessibility Coordinator | General Operating Budget   | 2/03 -7/04                        |
| Room Signs-No Tactile and Braille                          | Add compliance room signs at permanent and common use spaces  | Facilities                                      | \$329<br><br>\$5 cost for interim solution of plastic self-adhesive labels | 2/10- 3/10                        |

SAMPLE 2

SAMPLE Treatment Program – ADA/504/Access to Services Plan

| Barrier  | Solution   | Priority      | Cost     | Funding Source        | Due Date         | Responsible Person                            | Completion Date                      |
|--|--|---------------|----------|-----------------------|------------------|---|--------------------------------------|
| <b>Physical Access:</b><br>Second floor water fountain spout too high        | Install paper cup dispenser  | A (Now)       | \$40     | Unrestricted Funds    | August 30, 2006  | Program Manager                               | August 1, 2006                       |
| <b>Physical Access:</b><br>No railing on stairs to second floor & back steps | Install railing on both sides  | B (Next year) | \$200    | Unrestricted Funds    | February 1, 2007 | Program Manager                               |                                      |
| <b>Physical Access:</b><br>Narrow doorway to counseling office               | Widen doorway to 32"   | B (Next year) | \$500    | Unrestricted Funds    | June 30, 2007    | Program Manager                               |                                      |
| <b>Program Access:</b><br>No pet policy                                      | Modify policy to allow for service animals   | A (Now)       | None     | N/A                   | July 30, 2006    | Executive Director w/ BOD Executive Committee | July 24, 2006                        |
| <b>Communication Access:</b> No TTY  | Obtain TTY and train staff. Interim solution training staff to use the California Relay System | A (This year) | \$400    | Office equipment fund | October 1, 2006  | Office Manager                                | CRS training completed July 16, 2006 |
| <b>Employment Access:</b><br>Employment application                          | Remove questions about health and disability.  | A (Now)       | None     | N/A                   | July, 2006       | Human Resources                               | July 30, 2006                        |
| <b>Physical Access:</b><br>Men's shower inaccessible                         | Remodel shower to compliance with ADAAG  | C (2008-2009) | \$15,000 | Capitol Expenditures  | July 1, 2009     | Building Maintenance                          |                                      |