

Sonoma County Housing Authority Community Development Commission

Americans With Disabilities 504 Self-Evaluation Report



**Sonoma County
Community Development Commission**

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I. PROJECT OVERVIEW

A. Acknowledgments

Sally Swanson Architects, Inc., (SSA), would like to thank Martha Cheever, Housing Authority Manager, and all of the staff at the Sonoma County Housing Authority and Community Development Commission for their work on this project. Without Ms. Cheever's dedication and all the responses provided by the Staff, this project would not have been possible.

B. Introduction

On June 18, 2019, the Sonoma County Housing Authority entered into a Voluntary Compliance Agreement ("VCA") with the U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. One requirement of this VCA is the completion of a Section 504 Self-Evaluation of the Housing Authority's programs, activities and services. To meet this obligation, and to create a path forward toward total accessibility, the Housing Authority has contracted with Sally ADASwanson Architects, Inc. (SSA) to assist with meeting (ADA) Title II mandates.

This document presents only the Self-Evaluation. This evaluation provides a comprehensive report outlining a review of the Housing Authority's programs, services and activities. Results of the survey and analysis identify programmatic and administrative barriers to programs and are contained herein. It is important to note that the Housing Authority has undergone significant staffing changes since the VCA was entered into. During the creation and drafting of this report, the Housing Authority was

actively recruiting for a 504 Compliance Coordinator who will be charged with coordinating much of the program compliance work noted within this Report.

C. Background Information Regarding the Americans with Disabilities Act and California State Law

1. Purpose of the Americans with Disabilities Act

Passed in 1990, the Americans with Disabilities Act (ADA) is one of the most comprehensive civil rights laws in the nation. It provides protection to an estimated 57 million Americans in: employment (Title I); receipt of programs, services and activities from State and local government (Title II); the receipt of goods and services from private businesses (Title III); and telecommunications (Title IV). In 2008, the Americans with Disabilities Amendment Act (ADAAA) was passed. The ADAAA gives guidance to the courts regarding who has standing under ADA. The result has been an increasing number of people who are now able to bring ADA claims in Federal Court.

2. Overview of Disability Civil Rights Laws Impacting the Housing Authority

The Sonoma County Housing Authority (“SCHA” or “Housing Authority”) is covered by the ADA Title II, ADAAA of 2008, the Rehabilitation Act of 1973 Section 504 - including Section 504’s program accessibility requirements at 24 CFR Part 8 - and California Government Codes 11135 and 12926. All contractual activities are also covered by California Government Code 4450. Employment programs are covered by the ADA (Title I), the ADAAA and California Government Code 12926. Construction

activities are covered by California Code 4450. When comparing State and Federal law 28 CFR 35.103, it is mandated that the most stringent law be applied to create the maximum amount of access for people with disabilities. Thus, the most stringent standards were applied to the evaluation reported in this document.

3. ADA Self-Evaluation Requirements

Required by 28 CFR 35.105, the ADA Self-Evaluation is a complete examination of all programs, services and activities provided by the Housing Authority, to ensure that, when viewed in their entirety, they are readily accessible to qualified people with disabilities. The purpose of the ADA Self-Evaluation is to identify areas where changes are needed to ensure access is in place for people with disabilities.

4. Who is a Qualified Person with a Disability?

To be qualified as a person with disabilities for the purposes of this Self-Evaluation, an individual must have a disability as defined below and must be qualified to participate in the programs, services or activities of the Housing Authority.

Under California Government Code 11135, the ADA was incorporated into State law and therefore the ADA issues raised in this Report are both State and Federal issues. In California Government Code 12926, the definition of mental and physical disability was broadened beyond the ADA. Summarized as follows:

1. A person having a physical or mental disability that limits a major life activity. This person is considered as having unmitigated status (i.e., how the individual in question would function without the use of medication or devices that may mitigate the impact of the disability). If there is a limitation to a major life activity in this statute, coverage is established;
2. A person with a history of a disability as described above;

3. A person is regarded as having a disability, such as described.

California State law also provides protection to cancer survivors, people who have a genetic predisposition to illnesses or disabilities or people who have received services within a special education program.

D. Scope of the Self-Evaluation

The Self-Evaluation is intended as a review of the programs, services and activities provided by the Housing Authority. The US Department of Justice (DOJ) within the ADA Title II, Technical Assistance Manual (TAM) (Section II-8.2000) recommends a scope of review for Self-Evaluations, which contains thirteen program areas which were considered for use in the development of this report. Areas considered include:

- The Transition Plan (physical access to certain Housing Authority facilities),
- Policies that may limit or exclude the participation of people with disabilities;
- Communication systems used by the Housing Authority;
- Provision of auxiliary aids and services to people who are engaged in the Housing Authority's programs, services or activities;
- Access to emergency management for people with disabilities;
- Disability awareness among Housing Authority staff;
- Policies addressing policy modification requests and the determination of fundamental alteration of programs;
- Access to public meetings;
- Human Resources programs and policies;
- Construction policies;
- Housing Authority staff training and support;
- ADA-related drug policies.

E. Self-Evaluation Method of Review

The ADA mandates that a Self-Evaluation review all programs, services and activities of the covered entity. The Self-Evaluation of the Housing Authority's programs, services, and activities required involved the participation of every Housing Authority Department. In conjunction with the Community Development Commission, SSA developed targeted accessibility surveys. Each Department was assigned relevant surveys based on their programs, services and activities. Departments were instructed to complete a survey for different divisions if they were sufficiently separate and unique. Copies of the surveys are included in the Appendix to this report, and survey responses and corresponding attachments are available upon request.

F. ADA Transition Plan Requirements

The ADA Transition Plan is required by 28 CFR 35.150 (d). An ADA Transition Plan must include the following components:

1. A list of all physical barriers in sites at which the Housing Authority provides programs, services or activities;
2. A statement regarding the method to be used to mitigate the barriers;
3. A schedule for barrier mitigation;
4. The name of the official who is responsible for the ADA Transition Plan administration.

The ADA Transition Plan will be contained in a separate report.

G. How This Report is Organized & To Be Utilized

The Sonoma County Housing Authority is committed not only to compliance with federal and state laws regarding disability and access, but strives to be a model of accessibility and reasonable accommodations best practices. Accordingly, this Report is organized into two sections: (1) findings and recommendations for implementation; and (2) findings and recommendations on all programs, services and activities. Depending on survey responses, not all sections will include recommendations.

This Report is intended to be a summary – not full recitation – of survey results. Each section begins with an overview of recommendations, and segues into a breakdown of survey summaries providing the basis for those recommendations. Any recommendations provided by survey respondents will also be indicated as well, and helpful resources will be provided as links in footnotes.

By organizing the Report this way, the Housing Authority can easily access the information it needs and use this Report to sharpen its focus on providing the best possible service to its constituents with disabilities, and become a model of best practices.

II. SURVEY RESPONSES AND RECOMMENDATIONS

Section 504: Generally

Recommendations

- Implement processes to review whether the pertinent SCHA service agreement non-discrimination provisions are consistently monitored and enforced.
- Check with IT to determine whether notifications regarding Preliminary Housing Applications are compatible with screen reading technology.
- Ensure that SCHA provides a notice of its non-discrimination policy in all meeting notices.
- Determine whether service providers ensure compliance with Section 504's non-discrimination notice requirements.
- Determine whether Section 504's non-discrimination notice requirements are included when service providers update their program information, advertising and marketing materials.

Responses

Service Agreements

With regard to whether all SCHA agreements with service providers that provide services on behalf of SCHA include a provision that holds the service provider to the mandates of Title II of the ADA and California Government Code 11135, responses were split between “Yes” and “Not Sure”. However, a template service agreement provided by one of the respondents did in fact contain this language. Similar responses were provided with regards to whether service agreements also required compliance with federal non-discrimination laws for the FSS. Again, this requirement appears to be part of the SCHA's template service agreement.

With regard to whether these provisions were monitored and/or enforced, survey respondents were not sure, or believed that monitoring and/or enforcement was not done consistently. As to whether SCHA monitors service providers to ensure those providers have the resources to assist service recipients with disabilities, two responses indicated “not sure” and one responded “not consistently”. One survey response did note, however, that SCHA is “currently recruiting for a 504 Administrator who will be tasked with monitoring compliance on a regular basis.”

With regard to whether SCHA monitors Project Based Voucher (PBV) Housing providers to ensure those providers have the resources to assist service recipients with disabilities, responses were evenly split between “not sure”, “not consistently” and “yes”.

Notably, however, survey respondents supplemented:

- “This is established in contracts and explained in procedures and discussed at the management level.”

And

- “We have recently implemented a biennial monitoring schedule and are actively recruiting for a 504 Administrator who will be tasked with monitoring compliance on a regular basis.”

One survey response indicated that there are consequences to a service provider if it is determined that a program, service, or activity provided on behalf of the SCHA fails to comply with the mandates of Title II of the ADA and California Government Code 11135. Specifically, “They [the service provider] will receive a notice of non-compliance, a period of time to correct the deficiency. If the deficiency is not corrected, funding may be withheld.” If it is determined that a service provider service provider failed to comply with federal non-discrimination laws for the FSS, they will no longer be allowed to participate as an FSS service provider.

While two respondents were not sure whether recipients of services via service agreements are informed of their civil rights in the course of receiving or participating in those services, one respondent noted that this was done both verbally and on paperwork. It was unclear to some respondents whether this notification was provided in a format accessible to persons with disabilities. Recourse is available to recipients of programs, services or activities via service agreements if they believe that their civil rights have been violated by service providers. Specifically, one response noted that:

The Voucher states: "If the family has reason to believe that, in its search for suitable housing, it has been discriminated against on the basis of age, race, color, religion, sex, disability, national origin, or familial status, the family may file a housing discrimination complaint with any HUD Field Office in person, by mail, or by telephone. The PHA will give the family information on how to fill out and file a complaint." And discrimination/fair housing forms are provided in informational packets.

To pursue recourse, a client may contact SCHA and would be assisted in filing a housing discrimination complaint.

In response to how recipients bringing such an allegation could request reasonable accommodations in the process of seeking recourse, a respondent noted "We inquire as to the need for Reasonable Accommodations at the time of waitlist application, intake, briefing and recertification." Additionally, the respondent noted that reasonable accommodations are provided via the Request for Reasonable Accommodation Procedure (which is covered in the SCHA Administrative Plan), and that reasonable accommodations are made "based on need and ability of the [Housing Authority] to provide."

Methods of Administering Federally Funded Programs

According to survey responses, SCHA conducts outreach to the public and prospective Housing Choice Voucher (HCV) applicants regarding the HCV program in several ways, including:

- Radio, local news papers, email blast, sharing of information with partner agencies, press release, outreach in the local community.
- On our website, through a broad media distribution, through several different email list-serves, and through non-profits

According to survey responses, this outreach states that applications can be made online, or on paper if needed. It also states that assistance is available, including language assistance, as needed. SCHA ensures that this outreach is accessible to people with disabilities through the following actions: “PDFs are remediated, both email and phone contacts are provided as well as TDD. We offer to mail paper forms if needed but will also accept in other ways if needed.”

A majority of respondents indicated that HCV Program outreach materials indicate how applications may be made to the HCV program. Specifically, HCV applicants are informed of the option to apply online or on paper:

- In writing, and on a remediated webpage; and
- It is notated on all outreach materials and on the SCHA website.

Requests for paper applications to the HCV program may be requested via phone, email, written letter, fax, or verbally. All respondents noted that the phone lines to which these requests might be made are all compatible with TTY

technology. It was not clear whether all facilities where these paper applications could be obtained were consistently compliant with applicable ADA and California Building Code (CBC) accessibility requirements.¹ If paper applications cannot be obtained at SCHA facilities because of built environment barriers, equivalent facilitation is achieved by mailing an application to the person requesting.²

Survey respondents were not sure whether the online HCV application is compliant with Web Content Accessibility Guidelines.³ Paper applications can be submitted to the SCHA via Fax, email, mail, text, drop box, or in-person. Prospective applicants for the HCV program are informed that they may receive assistance and/or reasonable accommodation in completing HCV program applications. With regard to the question of whether HCV preliminary applications are processed in the order received, or according to the date they were completed and/or postmarked survey responses indicated:

- Not consistently (in terms of data entry) but names are reached by lottery rank and preference.
- Applicants are offered service in the order they appear on the waitlist.

Placement is done by random lottery.

If a HCV applicant has submitted a Preliminary Housing Application (PHA) and is subsequently determined to be ineligible, the applicant is informed of this

¹ This will be addressed in the Transition Plan.

² Physical barrier remediation will be addressed in the Transition Plan.

³ But see Information Technology survey responses, below.

via email or in writing. SCHA ensures that this notification is accessible to people with disabilities by referring back to the application - which allows for reasonable accommodation requests - and ensuring those needs are met (e.g. alternative formats, or notification via phone). Responses were not sure whether digital communications regarding this were compatible with screen-reading technology.

Survey responses indicated that this notification includes information on how a determination of ineligibility may be disputed, and that applicants deemed ineligible may request a reasonable accommodation in order to fully engage in the dispute process. SCHA indicated that it will also grant up to 2 weeks as a reasonable accommodation, if needed, for extension of an application date or response deadline.

Survey responses indicated that SCHA ensures that Project Based Voucher housing providers process applicants for vacant units in the order that they appear on the HCV waiting list in the following ways:

- We have a procedure they must follow. The property manager is given the list of applicants in order and the manager must give detailed notes if moving onto the next applicant (denial reasons, etc.)
- We have an active procedure that is followed by PBV providers and checked by the Occupancy Supervisor

Reasonable Accommodation Policy

Survey responses stated that all SCHA marketing and press materials contain a statement offering the opportunity to request a reasonable accommodation, and reviews of these materials are done to ensure consistent inclusion of this information.

Disability Verification

One survey response affirmatively noted that SCHA has changed its Administrative Plan as well as its policy and practices to ensure compliance with the 2004 HUD and Department of Joint Statement on Reasonable Accommodations. Two survey responses noted that SCHA also permits verification of a disability to be provided by a doctor, other medical professional, a peer support group, a non-medical service agency or a reliable third party, who is in a position to know about the person's disability. Additionally, in verifying a disability and/or request for accommodation, the SCHA does not inquire regarding the nature and severity of the person's disability.

Survey responses noted that SCHA employees are informed regarding policies and practices with respect to verifying a disability via training on Fair Housing and Reasonable Accommodation, training that has occurred in the last 12 months. To ensure that SCHA employees do not make inquiries regarding disability verifications which may overstep legal bounds, employees utilize a standard form.

Nexus and Consistency of Application

With regard to policies and practices in place regarding the evaluation of the nexus between a disability and requested accommodation, survey responses noted: Determination is made by the Housing Authority Manager utilizing information on the RA form and any follow up information gathered help make the determination.

All requests for reasonable accommodation are reviewed by a Housing Authority Manager or Supervisor. Nexus must be established between disability related need and the accommodation requested. employees are informed of SCHA's policies and/or practices with respect to evaluating nexus via training and the Administrative Plan. Two

survey responses noted that SCHA policies and/or practices provide guidance to SCHA employees who are unsure regarding the nexus. Specifically:

- employees are directed to inform all applicants/participants of the ability to request a reasonable accommodation. Nexus determinations are made by the manager.
- Interactive process must be initiated and additional information will be requested. Only managers or supervisors are tasked with reviewing requests for reasonable accommodation.

Consistent determination of nexus is achieved because only managers or supervisors are empowered to make this determination. SCHA audits itself to ensure that it consistently implements its reasonable accommodations process with regard to determining a nexus by keeping a log of reasonable accommodations requests and responses.

Tracking

SCHA tracks program participants with verified disabilities who require reasonable accommodation via spreadsheet and (HP) software. Survey responses indicated that SCHA ensures that information regarding approved accommodations is communicated internally, as well as to pertinent service providers through approval letters, a note in the client file, and/or that electronic or physical files are flagged. Survey responses explained that information regarding a client's disability is kept confidential as follows:

- All disability related information that may be submitted as part of an RA request is redacted.

- Only authorized personnel have access to participant files. We do not keep information regarding the type or severity of the disability in the file.

Responses were split between “not sure” and “not consistently” as to whether SCHA requires persons with verified disabilities to provide ongoing verification. It may be required “For persons with additional bedrooms related to a disability, proof of need for the space is required at recertification.” SCHA employees have received training regarding SCHA’s policies and practices regarding program participant reasonable accommodations in the last 12 months.

Accessible Units

Identifying Accessible Units

Survey responses indicate that SCHA identifies accessible units and/or units with accessibility features on their vacant unit listing. To ensure they attract owners with accessible units for the HCV program, SCHA has a full time Housing Locator who engages in ongoing landlord outreach. SCHA is also a member of all local apartment and rental associations. Whenever a housing provider requests to place a unit on SCHA’s available unit listing they are asked for any accessibility features of the unit.

Tracking Availability of Accessible Units

SCHA keeps track of accessible units, on its available unit listing for private rentals and an internal log of PBV accessible units. These lists are updated whenever a landlord adds a new unit, and these lists are reviewed weekly.

Communicating Available Units

Survey responses stated that Program Participants are told about an available unit listing during their briefing. Additionally, they may subscribe to the available unit

listing at any time. Finally, an email notification goes out to all subscribers each time the listing is updated. When issuing a housing voucher to a family with disabilities, SCHA includes a current listing of known available accessible units (including any specific features). Specifically, SCHA provides the Program Participant a copy of available unit listings.

Offering Available Accessible Units (and Assisting in the Search)

In order to maximize the utilization of accessible PBV units by persons with disabilities SCHA makes sure that “all units with accessibility features are provided to anyone who wants it”. To ensure that vacant, accessible PBV units are first offered to occupants with disabilities of another unit of the same project (or comparable projects) who are not occupying accessible units, waitlists are screened for applicants who have indicated the need for an accessible unit. If no applicants are identified needing the accessibility features, SCHA screens its main HCV waitlist.

Section 504 Grievances

Based on survey responses, SCHA indicates that it has amended its ADA (Section 504) grievance procedures to include notifying an individual of the right to file a complaint with the state or federal government against SCHA (without first filing with (or notifying) the SCHA). Individuals informed of this right in all notifications where an adverse determination is made. Per survey responses (including Information Technology), SCHA’s online ADA grievance form complies with the most current Web Content Accessibility Guidelines. Additionally, SCHA has posted its ADA grievance policy and has grievance forms available at reception desks. Survey responses

indicated that SCHA staff are trained on how to provide assistance to people with disabilities who help to complete this form.

SCHA's PBV housing providers are required to provide the HA with a copy of their ADA grievance policy and procedures and SCHA respondents noted that these are monitored biennially by an on-staff person.

SCHA ensures that any complaint alleging violation of the ADA is heard by a hearing officer knowledgeable about Section 504, and provides training to hearing officers. Responses were split on whether SCHA ensures that Hearing Officers:

- evaluate whether a requested reasonable accommodation may pose an undue financial burden; or
- evaluate the nexus between a disability and a requested reasonable accommodation.

One respondent noted, however, that, "The hearing officer is independent of the SCHA. They are sent to trainings regarding the responsibilities of the Hearing Officer. Evaluation of the nexus is part of this training." All responses indicated that Hearing Officer decisions are provided in accessible formats.

Non-Discrimination Notices

The majority of survey responses indicated that the SCHA main office has posted a one-page non-discrimination notice, in English and Spanish, that includes the 504 Coordinator's name and contact telephone number. Survey responses noted that this notice is posted in a location easily accessible to the public and posted at a height that is readable for wheelchair users.

All survey responses were unsure whether:

- SCHA provides a notice of its non-discrimination policy in *all* meeting notices;
 - SCHA monitors its service providers to ensure compliance with Section 504's non-discrimination notice requirements; or
 - Section 504's non-discrimination notice requirements are included when service providers update their program information, advertising and marketing materials.
-

Printed Communications

Recommendations

- Ensure that all printed publications, inform readers that the publications are available in alternative formats, if needed.
- Develop and distribute a “style guide” to ensure consistent font size and type that are aligned with best practices for print that is accessible to people who have low vision and/or are visually impaired.⁴
- Review all publications and notices to determine whether they portray persons with disabilities in a demeaning or offensive manner, and whether publications and correspondence use “person first language”.
- Provide training to all Staff regarding the creation of publications and notices that portray persons with disabilities in a positive manner, and the use of “person first language”. Make sure to track training attendance.

Responses

Generally, survey responses indicate not so much a lack of resource and/or compliance around print access, but a need for consistent knowledge and application of existing resources. Survey responses indicate that a majority of Staff are not sure whether printed publications and notices inform readers that the publications are available in alternative formats. To the extent these notifications are made, Staff was unclear whether notification language was standard to the County or created by the Housing Authority. When asked for the text of this notice, responses included:

⁴ Link to resource for this recommendation: <https://www.aph.org/aph-guidelines-for-print-document-design/>

- If you are a person with a disability and you need a disability-related accommodation to access any programs, services, or activities provided by the Sonoma County Community Development Commission or the Sonoma County Housing Authority, you may contact the Sonoma County Housing Authority at (707) 565-7500/TDD (707) 565-7555. Translation services are available upon request.
- Si usted es una persona con una discapacidad y necesita un alojamiento relacionado con la discapacidad para acceder a los programas, servicios o actividades proporcionados por la Comisión de Desarrollo Comunitario del Condado de Sonoma o la Autoridad de Vivienda del Condado de Sonoma, usted puede contactar la Autoridad de Vivienda del Condado de Sonoma at (707) 565-7500/TDD (707) 565-7555. Servicios de traducción disponibles bajo petición.

Survey responses indicate that a majority of Staff are not sure whether printed publications and notices use a certain font type and size for County published documents. Responses also indicate that a majority of Staff are not sure: whether all publications and notices have been reviewed to determine whether they portray persons with disabilities in a demeaning or offensive manner; or whether publications and correspondence use “person first language”.

Communication With People Who are Deaf or Hard of Hearing (DHH)

Recommendations

- Ensure that all business cards and letterhead list “711 the California Relay”.⁵
- Ensure that all letters and forms indicate a TDD phone number.
- Request that telephone lines be tested to determine whether they are accessible to persons who are deaf and hard of hearing.

⁵ See <https://ddtp.cpuc.ca.gov/default1.aspx?id=1482>

- Ensure that all Staff are aware of local resources that can provide auxiliary aids for communication as needed.
- Ensure that all Staff are aware that videos must be captioned, including videos that are played for the public, e.g. in lobbies.
- Ensure that Staff are aware of the Housing Authority’s policy for securing video remote interpreting services (VRI).
- Whenever a Public Information Officer is utilized, ensure that Staff are aware that an American Sign Language interpreter should be visible and within the screenshot if television cameras are in use and/or that a captioning service is to be used.

Responses

Generally, survey responses indicate not so much a lack of accessibility for people who are deaf or hard of hearing, but a need for consistent knowledge and application of the resources that exist. Survey responses indicate that business cards and letterhead largely do not, or do not consistently list “711 the California Relay Service”, and more than half of respondents were not sure if phone lines are accessible. Staff were not consistently aware of how Housing Authority videos are captioned, or the policy for securing Video Report Interpreting (VRI) services.

Software & Digital Communication

Recommendations

- Review to determine whether the Housing Authority uses any third party software and/or offers any type of computer or digital device for use by the public. If so, determine whether these meet WCAG 2.1 AA, have operating systems with accessibility features, and/or can be utilized with accessible technology (e.g. braille keyboards, screen reading technology, etc.).
- Offer refresher training on accessible communications best practices to ensure that all email communications - and attachments - are accessible to people with disabilities.

Responses

Survey responses indicate that the Housing Authority's website is accessible to persons with disabilities (by applying Web Content Accessibility Guidelines, specifically, WCAG 2.1 AA), and that this is mandated by the County. The County subscribes to a service that monitors for ADA compliance, site templates are reviewed for compliance periodically, and editors are trained in remediation.

For any web-based forms (for internal or public use), the final product is evaluated via WebAIM's WAVE toolbar or Acrobat Accessibility checker (HTML and PDF, respectively). In addition, Staff listen out loud and test for keyboard accessibility. Staff was not sure if the Housing Authority uses any third party software or offers any type of computer or digital device for use by the public.

With regard to email communications, Staff was not sure if accessible communications practices, including accessible attachments, were consistently applied to all formats (e.g. PDFs - yes, Word documents - not consistently, jpegs - yes).

Information Technology

Recommendations

- No recommendations for this section.

Responses

Survey responses indicate that the Housing Authority's Information Technology Staff (IT) generally adheres to WCAG 2.1 AA. In order to ensure digital accessibility, IT:

- Offers annual training seminars and technical classes throughout the year to editors and designers;

- Leads (and encourages trainers to attend WebAIM training seminars);
- For each new request for web content, reviews accessibility concerns and provides remediation where needed;
- Reviews software purchases sent through the Purchasing Dept are reviewed for ADA compliance;
- Solicits information from vendors via questionnaire or VPAT.

Additionally, accessibility clauses have been added to the Housing Authority's standard Professional Services Agreement. IT stated that it evangelizes digital accessibility at every opportunity to reinforce education.

Human Resources

Recommendations

- Affirm that the Housing Authority consistently and affirmatively recruits persons with disabilities for available positions.
- Offer interview panel members training regarding disability awareness and appropriate interactions with people with disabilities, and track attendance.⁶
- Because event accessibility includes more than accessibility in a built environment, develop an events accessibility checklist, and distribute it to all persons who have responsibility for implementing and overseeing events (for both staff and the public).⁷
- In the era of COVID, ensure that virtual events are also accessible.⁸

⁶ See, e.g.

<https://www.dol.gov/agencies/odep/publications/fact-sheets/focus-on-ability-interviewing-applicants-with-disabilities>; also see the County's guidance on this, here: <https://sonomacounty.ca.gov/HR/EEO/Toolkit/Etiquette/>

⁷ See, e.g. https://ens.lacity.org/dod/indexpage/dodindexpage169433612_11152005.pdf, <https://www.stinsondesign.com/blog/ultimate-guide-accessible-presentation-design>, and <https://www.boia.org/blog/tips-for-making-your-presentations-accessible>

⁸ See, e.g.

<https://www.fda.gov/about-fda/internet-accessibility/accessible-web-conferences-and-webinar-best-practices>.

- To ensure knowledge and consistent application of disability rights laws, offer regular training (upon hire, and refresher training) regarding disability civil rights, requirements, and best practices.⁹
- Affirm that current County policies include a clear statement on the prohibition of discrimination against people who formerly used drugs illegally and have been through a rehabilitation program.¹⁰

Responses

The survey respondent for this section was unsure whether the Housing Authority Staff affirmatively recruits persons with disabilities for available roles, but indicated that job listings are accessible to people with disabilities. Specifically, the respondent noted that the Housing Authority “uses the applicant tracking system, NEOGov/government jobs.com, which is ADA complaint.” Additionally, job listings contain a statement of non-discrimination against people with disabilities.

The survey respondent indicated that candidates for employment have the opportunity to request reasonable accommodation, but that interview panel members may not be trained regarding disability awareness and appropriate interactions with people with disabilities. The respondent affirmed that, when Staff conducts employment interviews, the decision to hire is always based upon which candidate is best qualified to perform the essential functions of the job with or without reasonable accommodations, and that those essential functions are determined via discussion and job analysis on several management levels. Additionally, Staff and employees are offered an opportunity to self-identify as a person with a disability.

The survey respondent indicated that the Housing Authority ensures that employee events (e.g. holiday parties, trainings, off-site retreats, etc.), are fully

⁹ See, e.g. <https://www.eeoc.gov/publications/ada-your-employment-rights-individual-disability>, and <https://askjan.org/ADA-Library.cfm>

¹⁰ See, e.g. 42 U.S.C. § 12114(b)

accessible by being held at accessible locations; and optional training on accessibility best practices and/or the ADA is offered to staff, employees and/or volunteers via ISD accessibility document training. Opportunities for advancement and education are available and accessible to Staff and employees who may have a disability through discussions with employees who may require an accommodation.

The Housing Authority has a process for employees to request a reasonable accommodation, specifically application of the County's Disability and Reasonable Accommodation Policy which can be found at <https://sonomacounty.ca.gov/Home/>. This process includes a search for transfer into a vacant, funded role as an accommodation of last resort and, if one can be found, there is no requirement to compete for the position. If reasonable modifications are used to create access, they are approved before they are put in place. Specifically, the respondent indicated that, "Conversations are facilitated with Disability Management, supervisor and employee or candidate. Final approval is with the Executive Director or their designee." Additionally, when reasonable modifications are put in place, they are documented to ensure staff implements them appropriately.

The survey respondent indicated that facilities and offices are not consistently fully accessible, but that "We have accessibility surveys and are looking to put recommendations into place."

The Housing Authority has an anti-disability harassment policy, specifically the County's EEO policy (last updated in 2016) and the County's Reasonable Accommodation Policy. This policy is accessible "via the County website and through AB125 training required every two years."

The survey respondent indicated that Housing Authority/County's grievance system offers assistance to people with disabilities who, due to their disability, are not able to independently complete the grievance; and this system provides timelines as to when a complainant can expect a result. The grievance system also contains a notice regarding availability of the grievance system in alternative formats, as well as the name and contact information of the ADA Coordinator.

The survey respondent was not aware of any complaints or grievances regarding failure to reasonably accommodate and/or lack of accessibility by candidates, employees, or visitors to any of its offices.

The Housing Authority relies on the County's Disability and Reasonable Accommodations Policy with regard to service and/or support animals. Its office has an ADA Notice of Compliance posted. The survey respondent was not sure whether the Housing Authority has a policy in place that prohibits discrimination against people who formerly used drugs illegally and have been through a rehabilitation program.¹¹ Finally, the survey respondent provided links to web pages with instructive information, which are included in the footnote to this paragraph.¹²

¹¹ A brief review of the EEO policy provided by the survey respondent, linked in the footnote below, did not include specific reference to this prohibition. It is not clear whether this is included in a separate County policy and/or document.

¹² Disability and Reasonable Accommodation Policy:

<https://sonomacounty.ca.gov/HR/Disability-Management/Policy/Disability-and-Reasonable-Accommodation-Policy/>

EEO Policy Link:

<https://sonomacounty.ca.gov/CAO/Administrative-Policies/EEO-Policy/#:~:text=The%20County%20of%20Sonoma%20has,state%20laws%20and%20County%20ordinances.>

Public Meetings

Recommendations¹³

- Determine whether the County has an up-to-date events accessibility checklist. If so, make sure this is distributed to all teams and/or personnel who may have a role in setting up events. If not, create and distribute an events accessibility checklist. Make sure that the events accessibility checklist covers all areas regarding which survey respondents were not sure or were not clear, see below.¹⁴
- Ensure that all persons who administer public meetings are aware of how to respond to requests for reasonable accommodations by members of the public (and/or of existing training on this topic).
- Ensure that public meeting notices contain language indicating that service animals are welcome, and that service animal relief areas identified before every public meeting where service animals are present.
- Ensure that emergency exits are identified before every public meeting.
- Ask security contractors whether their personnel are trained in best practices for conducting security checks for persons with disabilities.

Responses

Survey responses indicated that some public events are held, and it is not clear whether these events follow a checklist to ensure complete access for persons with disabilities. A majority of respondents were not sure whether all persons who administer public meetings were trained in how to respond to requests for reasonable accommodations by members of the public.

Most survey responses indicated that public events were always held at locations accessible to public transportation, and that venue spaces were accessible to persons

¹³ All recommendations here can be included in an existing, updated or newly created events accessibility checklist.

¹⁴ For an example, see https://www.americanbar.org/content/dam/aba/administrative/mental_physical_disability/Accessible_Meetings_Toolkit.authcheckdam.pdf

who use mobility devices. Responses were less clear whether meeting rooms were set up to ensure access for persons who use wheelchairs. Most respondents were not sure whether public meeting notices contain language indicating that service animals are welcome. Survey responses were split on whether:

- emergency exits are identified before every public meeting;
- stages, speaking platforms, microphones and other items to be used by persons with disabilities are accessible;
- there is reserved seating for people who use wheelchairs (including companion seating);
- FM Loop systems (Assistive Listening Devices) available for persons who are hard of hearing (and staff are trained on use of these systems);
- sign language interpreters and/or real-time captioners available for all public meetings and, where applicable, retained for meetings lasting more than 2 hours and provided information in advance regarding names, unusual terms and/or difficult spellings;
- there is reserved seating at the front of the room for persons needing ASL;
- staff available to assist persons with disabilities, as needed, in completing speaker cards where applicable;
- podiums or dais' used for public speaking or public comment are accessible (i.e. adjustable); and
- all brochure racks, holders and literature displays are accessible to people with disabilities, including, e.g. all materials on an accessible route, with appropriate reach ranges and clear floor space.

Some survey responses indicated that security measures may be implemented for certain events, but it was not known whether security personnel - contractors - were trained in best practices for conducting security checks for persons with disabilities.

Emergency Procedures

Recommendations

- Ensure that there are procedures in place regarding the evacuation of persons with disabilities (including staff, employees and the public), including an up-to-date checklist regarding accessibility at evacuation shelters or centers.

Responses

Survey respondents were not sure whether there are procedures in place regarding the evacuation of persons with disabilities (including staff, employees and the public). Responses indicated that Staff work in partnership with other entities regarding the setup and administration of evacuation shelters or centers, and that this partnership may include, among other things, contract monitoring, and project set up oversight.

Responses were split as to whether the Housing Authority maintains a checklist regarding accessibility at evacuation shelters or centers.

Purchasing, Contracts, Vendors

Recommendations

- Develop a protocol to ensure that, when the purchase of new equipment is made, it is reviewed to ensure the equipment is accessible to users with disabilities.
- Ensure that there is guidance in place for staff and vendors regarding clear space and furniture placement at Housing Authority facilities, including reception areas, lobbies and applicable employee spaces.

Responses

The survey respondent was unsure:

- Whether, when the purchase of new equipment is made, it is reviewed to ensure the equipment is accessible to users with disabilities; and
- Whether there is guidance in place for staff and vendors regarding clear space and furniture placement at Housing Authority facilities, including reception areas, lobbies and applicable employee spaces.

The survey response affirmatively indicated that:

- all public documents related to bidding and contracting are available to persons with disabilities in alternative format if needed;
- meetings related to bidding and contracting are held in accessible locations;
- accessibility plan checks are done when vendors are conducting improvements in public service areas, housing projects, and/or participating owner buildings;
- all contracts for new construction hold design professionals to designs that use the most stringent access standards in effect at the time of the project;
- all contracts for new construction encourage design professionals to exceed the maximum access standards when possible to ensure that construction tolerances are built into the project.

The survey response indicated that, for Project Based Vouchers, the Housing Authority complies with HUD accessibility requirements for PBV percentages.

Additionally, the respondent noted that the Housing Authority does not have any public housing or own property. When requesting proposals for PBV the Authority seeks projects that exceed accessibility standards.

Facilities and Real Estate Management

Recommendations

- Work with building code inspectors/officials to develop an accessibility construction inspection checklist.
- Implement policy and/or procedure to ensure proper maintenance of accessible features.

Responses

Survey responses were split on whether SCHA Staff and/or Team ensure the accessibility of any public rights of way (PRoW). One survey response noted, however, that: “Public sidewalks and parking lots, as well as paths of travel are under the purview of the owner of our leased facility. Furniture and pathways on the inside of the office are handled by County General Services in conjunction with the HA's [Housing Authority's] 504 and ADA Coordinator. This HA position is currently vacant and anticipated to be filled in the coming months.” Links to relevant policies/procedures were provided.¹⁵ In response to how SCHA monitors PRoW for accessibility issues, survey responses noted: “Staff visually work to ensure that there are not obstacles in walkways within the facility. If defects are reported on the exterior of the building, our facilities manager notifies the property manager.”

Survey responses were split on whether SCHA has an accessibility construction inspection checklist for use by building code officials/building inspectors as a reference guide to assist with on-site inspection of accessibility features and construction elements affecting accessibility compliance to facilities. All survey respondents indicated

¹⁵ <https://sonomacounty.ca.gov/CDC/Accessibility-Assistance/>. We utilize the County of Sonoma's ADA policies and procedures located here: <https://sonomacounty.ca.gov/HR/EEO/ADA-Toolkit/>

they were unclear whether there is a policy and/or procedure in place ensuring proper maintenance of accessible features.

Planning, Construction, Buildings

Recommendations

- Ensure that there is a process in place for resolving accessibility issues which may arise during construction (e.g. temporary paths of travel constructed via barricade, temporary curb ramps, etc.)

Responses

The survey respondent indicated that, when examining plans, Staff evaluates accessibility requirements, specifically that, “The plans and/or existing conditions are compared to the current building code.” The survey respondent also noted that, during construction, Staff evaluates construction sites for accessible paths of travel along public rights of way by way of field observations throughout the course of construction. Complaints regarding building accessibility for persons with disabilities can be made/received via email and phone, and resolved by barrier removal construction projects. The survey respondent represented that there are seven Staff members who evaluate accessibility of built environments for persons with disabilities, and added that the County of Sonoma “has an active and robust program to remove barriers.”

Records

Recommendations

- Ensure that all Staff know they should offer assistance to persons with disabilities with regard to public records services as required.

- Offer training to Staff on PDF accessibility (perhaps in conjunction with the recommended digital communications training, above).
- Ensure that areas reserved for viewing public records are maintained to insure clear floor space and access for persons with disabilities.

Responses

Survey responses indicated that records are currently maintained in both digital and hard copies (but the Housing Authority is working to transition to digital only). With regard to how the Housing Authority ensures that digital records are fully accessible to persons with disabilities, responses noted that Staff can email or print the documents for persons with disabilities, or will provide the documents in whatever format is required including PDF because of its accessibility/readability function. All responses noted that Staff permit members of the public to visit facilities to physically examine hard copies (printed) records.

Housing Authority Staff ensure that public records' examination areas are accessible to persons with disabilities in several ways:

- Clear space and a desk accessible to people who use mobility devices;
- Periodic accessibility review of lobby space by the Housing Authority's 504 Coordinator;
- Notices posted in interview rooms regarding ability to request reasonable accommodations, and for materials in alternative formats.

Two of three survey responses indicated that Housing Authority Staff offer assistance to persons with disabilities with regard to public records services, e.g. filing, requesting documents, reviewing documents; one survey respondent was unsure. When asked to describe the assistance offered, including how this assistance is publicized and how the public may make a request for assistance, survey responses included:

- In-person signage, assistance for completing applications, phone requests, provision of materials in alternative formats, or requests submitted online.
 - Notices in lobbies which state, "If you are a person with a disability and you need a disability-related accommodation to access any programs, services, or activities provided by the Sonoma County Community Development Commission or the Sonoma County Housing Authority, you may contact the Sonoma County Housing Authority at (707) 565-7501/TDD (707) 565-7555. Translation services are available upon request."
-

Health and Well-Being Services

Recommendations

- Request information from supportive services providers on how they ensure that their services, communications and marketing materials are accessible to people with disabilities.

Responses

Survey responses indicated that some programs involve referral to medical and/or mental health services. Examples of these services include:

- Referrals to supportive services, protective services, and/or mental health services
- Front office staff answer general questions over the phone and in person about the Housing Choice Voucher program and waitlists.

Some of these services are delivered directly (e.g. general questions answered over the phone or in person regarding programs and waitlists), the remainder are provided via third party service providers, and referrals to Sonoma County Behavioral Health (ongoing care, acute/crisis care, etc.); Sonoma County Human Services (MediCal); and other community physical and behavioral/mental health organizations.

Because direct services are not administered by the Housing Authority, it is unclear:

- what policies and/or practices are in place to ensure that these services are accessible to people with disabilities;
- how direct service providers ensure that materials advertising their services (both print and digital) are accessible to people with disabilities; or
- how service providers ensure that communication methods (e.g. phone, virtual meetings, internet forms) are accessible to people with disabilities.

Vetting of Self-Evaluation Results

The Sonoma County Housing Authority is committed to the vetting of these results with stakeholders as required by law and developing an implementation plan designed to implement necessary changes and track good-faith compliance efforts.

Vetting Activity

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Report Concerning the Self-Evaluation Vetting

- Date(s) and location(s) of vetting (if applicable)
- List of attendees (if applicable)

Input Received During Vetting

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Response to Input during Vetting:

Persons Involved in Vetting:

Use of This Self-Evaluation as a Living Document

The ADA requires that a Self-Evaluation be conducted once. Many entities, including the Sonoma County Housing Authority, recognize the value of using this document on an ongoing basis. As such, it's available to incorporate new policies as needed in response to emerging issues in case law, new regulations or the development of, and/or modification of the Authority's programs. Thus, an addendum to this report can be added as needed to document the Authority's good-faith effort to make the changes necessary to ensure appropriate access for employees and recipients of the Authority's programs, services and activities.

Staff Who Contributed to this ADA Self-Evaluation

- Susan Anton-Tracy, Office Assistant
- Alexander Arend, Senior Office Assistant
- Tracy Becker, Program Compliance Officer
- Bianca Belmont, Occupancy Specialist
- Martha Cheever, Housing Authority Manager
- Marcus Corey, Office Assistant 2
- Nadia Curiel, CDSII - Bilingual

Steve Fiano, Senior Project Specialist
Linda Franzman, Sr. Business Analyst
Michael Gause, Ending Homelessness Manager
Thai Hilton, Senior Project Specialist
Lori Houston, Program Planning & Evaluation Analyst
Annie Huynh, Intake and Occupancy Specialist I Extra help
Bryan Kroll, Senior Office Assistant
Orbelina Landaverde, Housing Liaison
Dusti Longfellow, ASOI
Jen Mazzamuto, Sr. CDS
Deborah Medina, Occupancy Specialist
Cynthia Meiswinkel, Intake & Occupancy Supervisor
Chuck Mottern, Homeless Services Funding Coordinator
Edith Ocegüera, Occupancy Specialist
Sonia Perez, Occupancy Specialist
Linda Ruiz, Department Analyst
Emily Quig, Housing Navigator
Doug Uyehara, Department Analyst
Karissa White, Continuum of Care Coordinator
Marcie Woychik, Chief Deputy Clerk of the Board
Mary Zepponi, Occupancy Specialist

Work Plan for the Self-Evaluation Implementation

The following is The Sonoma County Housing Authority's ADA Self-Evaluation work plan. It is contained in a spreadsheet designed to be modified as progress is made. It may also be modified when work is necessary that is not identified within the body of this Report. Such instances may occur pursuant to new regulations or case law developments.

The first column will contain a series of recommendations that come from interaction with Housing Authority officials. These are entitled "General Recommendations". The second column is "Action Taken by the Authority". This column is designed to record whether the College has accepted the recommendation, modified or rejected it. If the recommendation is rejected or modified it would be advisable to record the rationale for this action in the "notes" section, which is the seventh column to the right. Columns titled "Staff Assigned", Due Dates, "Reviewed by" and "Date" are designed to record progress in the implementation of the ADA self-evaluation.

Many of the recommendations are clustered by subject and can be addressed with one staff assignment. Occasionally, there will be one recommended action that addresses a number of issues noted within the report. For example, disability awareness training may benefit the Authority's operation in a number of areas which are noted by findings. The provision of the training, therefore, addresses a wide variety of issues.

It is very important that the date on the work plan be updated each time an entry is made.

Appendices

Appendix A

28 CFR 35.105 Self-Evaluation.

- (a) A public entity shall, within one year of the effective date of this part, evaluate its current services, policies, and practices, and the effects thereof, that do not or may not meet the requirements of this part and, to the extent modification of any such services, policies, and practices is required, the public entity shall proceed to make the necessary modifications.
- (b) A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the Self-Evaluation process by submitting comments.
- (c) A public entity that employs 50 or more persons shall, for at least three years following completion of the Self-Evaluation, maintain on file and make available for public inspection:
 - o (1) A list of the interested persons consulted;
 - o (2) A description of areas examined and any problems identified;
and
 - o (3) A description of any modifications made.
- (d) If a public entity has already complied with the Self-Evaluation requirement of a regulation implementing section 504 of the Rehabilitation Act of 1973, then the requirements of this section shall apply only to those policies and practices that were not included in the previous Self-Evaluation

Appendix B

California Government code section 11135

11135. (a) No person in the State of California shall, on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, genetic information, or disability, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state. Notwithstanding Section 11000, this section applies to the California State University.

(b) With respect to discrimination on the basis of disability, programs and activities subject to subdivision (a) shall meet the protections and prohibitions contained in Section 202 of the federal Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12132), and the federal rules and regulations adopted in implementation thereof, except that if the laws of this state prescribe stronger protections and prohibitions, the programs and activities subject to subdivision (a) shall be subject to the stronger protections and prohibitions.

(c) (1) As used in this section, "disability" means any mental or physical disability, as defined in Section 12926.

Appendix C

California Government Code Section 12926

Cal Gov Code § 12926 (2010)

§ 12926. Definitions regarding unlawful practices

As used in this part in connection with unlawful practices, unless a different meaning clearly appears from the context:

(a) "Affirmative relief" or "prospective relief" includes the authority to order reinstatement of an employee, awards of backpay, reimbursement of out-of-pocket expenses, hiring, transfers, reassignments, grants of tenure, promotions, cease and desist orders, posting of notices, training of personnel, testing, expunging of records, reporting of records, and any other similar relief that is intended to correct unlawful practices under this part.

(b) "Age" refers to the chronological age of any individual who has reached his or her 40th birthday.

(c) "employee" does not include any individual employed by his or her parents, spouse, or child, or any individual employed under a special license in a nonprofit sheltered workshop or rehabilitation facility.

(d) "Employer" includes any person regularly employing five or more persons, or any person acting as an agent of an employer, directly or indirectly, the state or any political or civil subdivision of the state, and cities, except as follows:

"Employer" does not include a religious association or corporation not organized for private profit.

(e) "Employment agency" includes any person undertaking for compensation to procure employees or opportunities to work.

(f) "Essential functions" means the fundamental job duties of the employment position the individual with a disability holds or desires. "Essential functions" does not include the marginal functions of the position.

(1) A job function may be considered essential for any of several reasons, including, but not limited to, any one or more of the following:

(A) The function may be essential because the reason the position exists is to perform that function.

(B) The function may be essential because of the limited number of employees available among whom the performance of that job function can be distributed.

(C) The function may be highly specialized, so that the incumbent in the position is hired for his or her expertise or ability to perform the particular function.

(2) Evidence of whether a particular function is essential includes, but is not limited to, the following:

(A) The employer's judgment as to which functions are essential.

(B) Written job descriptions prepared before advertising or interviewing applicants for the job.

(C) The amount of time spent on the job performing the function.

(D) The consequences of not requiring the incumbent to perform the function.

(E) The terms of a collective bargaining agreement.

(F) The work experiences of past incumbents in the job.

(G) The current work experience of incumbents in similar jobs.

(g) "Labor organization" includes any organization that exists and is constituted for the purpose, in whole or in part, of collective bargaining or of dealing with employers concerning grievances, terms or conditions of employment, or of other mutual aid or protection.

(h) "Medical condition" means either of the following:

(1) Any health impairment related to or associated with a diagnosis of cancer or a record or history of cancer.

(2) Genetic characteristics. For purposes of this section, "genetic characteristics" means either of the following:

(A) Any scientifically or medically identifiable gene or chromosome, or combination or alteration thereof, that is known to be a cause of a disease or disorder in a person or his or her offspring, or that is determined to be associated with a statistically increased risk of development of a disease or disorder, and that is presently not associated with any symptoms of any disease or disorder.

(B) Inherited characteristics that may derive from the individual or family member, that are known to be a cause of a disease or disorder in a person or his or her offspring, or that are determined to be associated with a statistically increased risk of development of a disease or disorder, and that are presently not associated with any symptoms of any disease or disorder.

(i) "Mental disability" includes, but is not limited to, all of the following:

(1) Having any mental or psychological disorder or condition, such as mental retardation, organic brain syndrome, emotional or mental illness, or specific learning disabilities, that limits a major life activity. For purposes of this section:

(A) "Limits" shall be determined without regard to mitigating measures, such as medications, assistive devices, or reasonable accommodations, unless the mitigating measure itself limits a major life activity.

(B) A mental or psychological disorder or condition limits a major life activity if it makes the achievement of the major life activity difficult.

(C) "Major life activities" shall be broadly construed and shall include physical, mental, and social activities and working.

(2) Any other mental or psychological disorder or condition not described in paragraph (1) that requires special education or related services.

(3) Having a record or history of a mental or psychological disorder or condition described in paragraph (1) or (2), which is known to the employer or other entity covered by this part.

(4) Being regarded or treated by the employer or other entity covered by this part as having, or having had, any mental condition that makes achievement of a major life activity difficult.

(5) Being regarded or treated by the employer or other entity covered by this part as having, or having had, a mental or psychological disorder or condition that has no present disabling effect, but that may become a mental disability as described in paragraph (1) or (2).

"Mental disability" does not include sexual behavior disorders, compulsive gambling, kleptomania, pyromania, or psychoactive substance use disorders resulting from the current unlawful use of controlled substances or other drugs.

(j) "On the bases enumerated in this part" means or refers to discrimination on the basis of one or more of the following: race, religious creed, color, national origin,

ancestry, physical disability, mental disability, medical condition, marital status, sex, age, or sexual orientation.

(k) "Physical disability" includes, but is not limited to, all of the following:

(1) Having any physiological disease, disorder, condition, cosmetic disfigurement, or anatomical loss that does both of the following:

(A) Affects one or more of the following body systems: neurological, immunological, musculoskeletal, special sense organs, respiratory, including speech organs, cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin, and endocrine.

(B) Limits a major life activity. For purposes of this section:

(i) "Limits" shall be determined without regard to mitigating measures such as medications, assistive devices, prosthetics, or reasonable accommodations, unless the mitigating measure itself limits a major life activity.

(ii) A physiological disease, disorder, condition, cosmetic disfigurement, or anatomical loss limits a major life activity if it makes the achievement of the major life activity difficult.

(iii) "Major life activities" shall be broadly construed and includes physical, mental, and social activities and working.

(2) Any other health impairment not described in paragraph (1) that requires special education or related services.

(3) Having a record or history of a disease, disorder, condition, cosmetic disfigurement, anatomical loss, or health impairment described in paragraph (1) or (2), which is known to the employer or other entity covered by this part.

(4) Being regarded or treated by the employer or other entity covered by this part as having, or having had, any physical condition that makes achievement of a major life activity difficult.

(5) Being regarded or treated by the employer or other entity covered by this part as having, or having had, a disease, disorder, condition, cosmetic disfigurement, anatomical loss, or health impairment that has no present disabling effect but may become a physical disability as described in paragraph (1) or (2).

(6) "Physical disability" does not include sexual behavior disorders, compulsive gambling, kleptomania, pyromania, or psychoactive substance use

disorders resulting from the current unlawful use of controlled substances or other drugs.

(l) Notwithstanding subdivisions (i) and (k), if the definition of "disability" used in the Americans with Disabilities Act of 1990 (Public Law 101-336) would result in broader protection of the civil rights of individuals with a mental disability or physical disability, as defined in subdivision (i) or (k), or would include any medical condition not included within those definitions, then that broader protection or coverage shall be deemed incorporated by reference into, and shall prevail over conflicting provisions of, the definitions in subdivisions (i) and (k).

(m) "Race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, marital status, sex, age, or sexual orientation" includes a perception that the person has any of those characteristics or that the person is associated with a person who has, or is perceived to have, any of those characteristics.

(n) "Reasonable accommodation" may include either of the following:

(1) Making existing facilities used by employees readily accessible to, and usable by, individuals with disabilities.

(2) Job restructuring, part-time or modified work schedules, reassignment to a vacant position, acquisition or modification of equipment or devices, adjustment or modifications of examinations, training materials or policies, the provision of qualified readers or interpreters, and other similar accommodations for individuals with disabilities.

(o) "Religious creed," "religion," "religious observance," "religious belief," and "creed" include all aspects of religious belief, observance, and practice.

(p) "Sex" includes, but is not limited to, pregnancy, childbirth, or medical conditions related to pregnancy or childbirth. "Sex" also includes, but is not limited to, a person's gender, as defined in *Section 422.56 of the Penal Code*.

(q) "Sexual orientation" means heterosexuality, homosexuality, and bisexuality.

(r) "Supervisor" means any individual having the authority, in the interest of the employer, to hire, transfer, suspend, lay off, recall, promote, discharge, assign, reward, or discipline other employees, or the responsibility to direct them, or to adjust their grievances, or effectively to recommend that action, if, in connection with the foregoing, the exercise of that authority is not of a merely routine or clerical nature, but requires the use of independent judgment.

(s) "Undue hardship" means an action requiring significant difficulty or expense, when considered in light of the following factors:

(1) The nature and cost of the accommodation needed.

(2) The overall financial resources of the facilities involved in the provision of the reasonable accommodations, the number of persons employed at the facility, and the effect on expenses and resources or the impact otherwise of these accommodations upon the operation of the facility.

(3) The overall financial resources of the covered entity, the overall size of the business of a covered entity with respect to the number of employees, and the number, type, and location of its facilities.

(4) The type of operations, including the composition, structure, and functions of the workforce of the entity.

(5) The geographic separateness, administrative, or fiscal relationship of the facility or facilities.

HISTORY:

Added Stats 1980 ch 992 § 4. Amended Stats 1985 ch 1151 § 1; Stats 1990 ch 15 § 1 (SB 1027); Stats 1992 ch 911 § 3 (AB 311), ch 912 § 3 (AB 1286), ch 913 § 21.3 (AB 1077); Stats 1993 ch 1214 § 5 (AB 551); Stats 1998 ch 99 § 1 (SB 654); Stats 1999 ch 311 § 2 (SB 1185), ch 591 § 5.1 (AB 1670), ch 592 § 3.7 (AB 1001); Stats 2000 ch 1049 § 5 (AB 2222); Stats 2003 ch 164 § 1 (AB 196); Stats 2004 ch 700 § 4 (SB 1234).

Amendments:

1985 Amendment:

Added **(1)** "or her" after "employed by his" in subd (b); and **(2)** subd (i).

1990 Amendment:

Added subd (j).

1992 Amendment:

(1) Added subd (a); **(2)** redesignated former subds (a)-(d) to be subds (b)-(e); **(3)** amended the introductory clause of subd (d) by **(a)** deleting ", except as hereinafter provided," before "includes"; and **(b)** substituting ", except as follows:" for a period; **(4)** added subdivision designation (d)(1); **(5)** added subd (d)(2); **(6)** added subd (f); **(7)** redesignated former subdivisions (e) and (f) to be subds (g) and (h); **(8)** substituted "includes, but is not limited to," for "means" in subd (h); **(9)** added subd (i); **(10)**

redesignated former subd (g) to be subd (j); **(11)** substituted "disability, mental disability" for "handicap" in subd (j); **(12)** substituted subd (k) for former subd (h) which read: "(h) 'Physical handicap' includes impairment of sight, hearing, or speech, or impairment of physical ability because of amputation or loss of function or coordination, or any other health impairment which requires special education or related services."; **(13)** added subds (l) and (m); **(14)** redesignated former subds (i) and (j) to be subds (n) and (o); and **(15)** added subd (p) and the last paragraph. (As amended 1992 ch 913, compared to the section as it read prior to 1992. This section was also amended by two earlier chapters, ch 911, ch 912. See *Gov C § 9605.*)

1993 Amendment:

(1) Substituted "functions" for "duties" after "Essential" both times it appears in subd (f); **(2)** deleted ", but is not limited to," after "includes" in subd (h); **(3)** deleted former subd (l) which read: "(l) 'Reasonable accommodation' may include either of the following:

"(1) Making existing facilities used by employees readily accessible to, and usable by, individuals with disabilities.

"(2) Job restructuring, part-time or modified work schedules, reassignment to a vacant position, acquisition or modification of equipment or devices, adjustment or modifications of examinations, training materials or policies, the provision of qualified readers or interpreters, and other similar accommodations for individuals with disabilities. It is the intent of the Legislature that the definition of 'physical disability' in this subdivision shall have the same meaning as the term 'physical handicap' formerly defined by this subdivision and construed in *American National Ins. Co. v. Fair Employment & Housing Com.*, 32 Cal. 3d 603. However, 'physical disability' does not include conditions excluded from the federal definition of 'disability' pursuant to Section 511 of the Americans with Disabilities Act of 1990 (42 U.S.C., § 12211). Additionally, for purposes of this part, the unlawful use of controlled substances or other drugs shall not be deemed, in and of itself, to constitute a physical disability."; **(4)** designated the former last paragraph in the section to be subd (l); and **(5)** substituted "of" for "or" after "size of the business" in subd (p)(3).

1998 Amendment:

(1) Amended subd (d) by **(a)** substituting the comma after "indirectly" for the semicolon; and **(b)** adding the comma after "thereof"; **(2)** substituted "that" for "which" after "organization" in subd (g); **(3)** amended subd (h) by adding **(a)** "(1) genetic characteristics, or (2)" after "include" in the first sentence; and **(b)** the second sentence; and **(4)** added "and" before "(5) the geographic" in subd (p).

1999 Amendment:

(1) Amended subd (d) by (a) substituting "of the state" for "thereof" in the introductory clause; (b) deleting subdivision designation (d)(1) at the beginning of the second paragraph; and (c) deleting former subd (d)(2) which read: "(2) 'Employer,' for purposes of provisions defining unlawful employment practices related to mental disability, means any person regularly employing 15 or more persons, or any person directly or indirectly acting as an agent of such an employer, and also includes the state and municipalities and political subdivisions of the state."; (2) substituted subd (h) for former subd (h) which read: "(h) 'Medical condition' includes (1) genetic characteristics, or (2) any health impairment related to or associated with a diagnosis of cancer, for which a person has been rehabilitated or cured, based on competent medical evidence. For purposes of this section, 'genetic characteristics' means any scientifically or medically identifiable gene or chromosome, or combination or alteration thereof, that is known to be a cause of a disease or disorder in a person or his or her offspring, or is determined to be associated with a statistically increased risk of development of a disease or disorder, or inherited characteristics that may derive from the individual or family member, that is presently not associated with any symptoms of any disease or disorder."; (3) substituted "or age" at the end of subd (j); (4) added subd (m); (5) redesignated former subds (m)-(o) to be subds (n)-(p); (6) added subds (q) and (r); and (7) redesignated former subd (p) to be subd (s). (As amended Stats 1999 ch 592, compared to the section as it read prior to 1999. This section was also amended by two earlier chapters, ch 311 and ch 591. See *Gov C § 9605*.)

2000 Amendment:

(1) Amended subd (h) by (a) adding "means" in the introductory clause; and (b) substituting "cancer or a record or history of cancer" for ", for which a person has been rehabilitated or cured, based on competent medical evidence" in subd (h)(1); (2) substituted subd (i) for former subd (i) which read: "(i) 'Mental disability' includes any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. However, 'mental disability' does not include conditions excluded from the federal definition of 'disability' pursuant to Section 511 of the Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12211). Additionally, for purposes of this part, the unlawful use of controlled substances or other drugs shall not be deemed, in and of itself, to constitute a mental disability."; and (3) substituted subd (k) for former subd (k) which read: "(k) 'Physical disability' includes, but is not limited to, all of the following:

"(1) Having any physiological disease, disorder, condition, cosmetic disfigurement, or anatomical loss that does both of the following:

"(A) Affects one or more of the following body systems: neurological, immunological, musculoskeletal, special sense organs, respiratory, including speech organs, cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin, and endocrine.

"(B) Limits an individual's ability to participate in major life activities.

"(2) Any other healthy impairment not described in paragraph (1) that requires special education or related services.

"(3) Being regarded as having or having had a disease, disorder, condition, cosmetic disfigurement, anatomical loss, or health impairment described in paragraph (1) and (2).

"(4) Being regarded as having, or having had, a disease, disorder, condition, cosmetic disfigurement, anatomical loss, or health impairment that has no present disabling effect but may become a physical disability as described in paragraph (1) or (2).

"It is the intent of the Legislature that the definition of 'physical disability' in this subdivision shall have the same meaning as the term 'physical handicap' formerly defined by this subdivision and construed in *American National Ins. Co. v. Fair Employment & Housing Com. (1982) 32 Cal. 3d 603*. However, 'physical disability' does not include conditions excluded from the federal definition of 'disability' pursuant to Section 511 of the Americans with Disabilities Act of 1990 (42 U.S.C., Sec 12211). Additionally, for purposes of this part, the unlawful use of controlled substances or other drugs shall not be deemed, in and of itself, to constitute a physical disability."

2003 Amendment:

(1) Added the second sentence of subd (p); and (2) amended subd (s) by substituting (a) "The" for "the" at the beginning of subds (s)(1)-(s)(5); and (b) the period for the comma at the end of subds (s)(1)-(s)(3) and the period for ", and" at the end of subd (s)(4).

2004 Amendment:

Substituted "*Section 422.56 of the Penal Code*" for "*Section 422.76 of the Penal Code*, except that, for purposes of this part, the reference in that definition to the "victim" shall mean the employee or applicant and the reference in that definition to the "defendant" shall mean the employer or other covered entity or person subject to applicable prohibitions under this part" in subd (p).

Appendix D

Sonoma County Housing Authority

Notice of Compliance Under ADA & California State Law

In accordance with the requirements of Title II of the Americans with Disabilities Act (ADA) of 1990, the Americans with Disabilities Amendments Act of 2008, the Fair Employment & Housing Act (FEHA), California Government Code Section 11135 and other applicable codes, Sonoma County Housing Authority does not discriminate against individuals on the basis of disability in its services, programs or activities.

Employment: The Authority does not discriminate on the basis of disability in its hiring or employment practices and will comply with the Fair Employment and Housing Act, as well as Title I of the ADA, including the regulations promulgated by the U.S. Equal Employment Opportunity Commission (EEOC), including the requirement to provide reasonable accommodations.

Effective Communication: The Authority will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities, including sign language interpreters, documents in Braille and other alternate formats to ensure information and communication is accessible to people who have speech, hearing, vision, or cognitive impairments so they can participate equally in the programs, services and activities.

Modification to Policies and Procedures: The Authority will make reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to participate in all of its programs, services and activities. *For example, individuals with service animals behaving within applicable standards are welcome in offices and Authority facilities, even when pets are generally prohibited.*

Anyone who requires auxiliary aids and services for effective communication, or a modification of policies or procedures to participate in a program, service or activity should submit their request for reasonable accommodations to Martha Cheever, Martha.Cheever@sonoma-county.org, (707) 565-7521(unless otherwise specified) as

soon as possible, but no later than **72 hours** before the scheduled event.

Neither the ADA, nor state law requires the Authority to take action that would fundamentally alter the nature of its programs, activities or services or impose an undue financial or administrative burden. Complaints about web accessibility can be submitted to cdc@sonoma-county.org, or via the website at <https://sonomacounty.ca.gov/Accessibility-Information/>. Complaints that an Authority facility, program, activity or service is not accessible should be directed to Martha Cheever, Martha.Cheever@sonoma-county.org, (707) 565-7521(unless otherwise specified).

The Authority will not place a surcharge on a particular individual with a disability or a group of individuals with disabilities to cover the cost of providing auxiliary aids and services or making a reasonable modification to a policy to create access.

Appendix E¹⁶

Sonoma County Housing Authority

ADA Notice Dissemination Plan

Title II of the ADA, 28 CFR 35.106¹⁷ requires that the Housing Authority produce and disseminate a notice of their ADA compliance.

The notice should be written clearly without undue complication. It should discuss what ADA requirements the entity is held to, the name of the ADA Coordinator, and provide current contact information enabling an individual to contact the ADA Coordinator. The notice should cover areas regarding:

- Employment;
- Effective Communication;
- Making reasonable modification to policies and programs;
- An explanation of the non-surcharge requirement concerning the provision of auxiliary aids and services; and

¹⁶ For use, as needed, based on above recommendations.

¹⁷28 CFR 35.106 Notice: A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part.

- Information regarding the grievance process.

In considering how to disseminate this document, the Authority should identify the impacted parties who would have an interest in the notice. The notice dissemination plan should address the frequency of notice dissemination. Methods of dissemination may include:

- The Authority's website;
- Local Newspaper(s);
- Authority Publications;
- Posters on Authority facilities;
- Inclusion of notice for special activities;
- Within transportation systems provided or contracted by the Authority; and
- Other forms in which impacted stakeholders might be present.

Not all of the above notice dissemination methodologies may be necessary to effectively disseminate the notice.

Appendix F¹⁸

Grievance Procedure under ADA or California State Disability Civil Rights Laws

This grievance procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"), the Americans with Disabilities Amendments Act (ADAAA) and California State law. It may be used by anyone wishing to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs or benefits by the Sonoma County Housing Authority. The Authority's Disability Discrimination Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of the complainant and location, date and a description of the problem(s). The Authority's Grievance Procedure form is available online at (ADD WHERE LOCATED) Alternative means of filing a complaint, such as personal interviews or a tape recording of the complaint, are available to persons with disabilities upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible, but no later than 60 calendar days after the alleged violation to:

¹⁸ For use, as needed, based on above recommendations.

Appendix G

Does the Staff ensure that its webpage is accessible to persons with disabilities by applying Web Content Accessibility Guidelines (WCAG)?

If yes, is this mandated by the County?

If yes, how does your Staff make sure its webpage meets the WCAG?

If yes, how does your Staff ensure that any updates meet the WCAG?

If yes, what version of the WCAG does your Staff apply to its webpage access requirements?

If not, who is responsible for ensuring that your webpage meets current WCAG?

Does your Staff use any web-based forms for use internally or by the public?

If yes, how do you ensure that these meet WCAG?

Does your Staff use any internally-developed software, including mobile applications and payment systems, either internally or externally?

If yes, how do you ensure that these meet WCAG?

Does your Staff use any third party software, including mobile applications and payment systems, either internally or externally?

If yes, how do you ensure that these meet WCAG?

Does your Staff use any touch screen information systems for public interaction?

If yes, is there an independent operating system for persons with visual impairments?

Does your Staff offer any type of computer or digital device for use by the public?

If yes, are they equipped with software that makes them accessible to persons with visual impairments?

If yes, how do you ensure that these devices and the software on them is accessible?

In email communications (both internal and external), does your Staff ensure that all communications – including attachments – comply with WCAG?

Are PDFs checked for accessibility?

Are PDFs also sent out as Word documents?

Are all photos captioned with descriptive text?

In what format does your Staff maintain records that are available to the public? (e.g. hard copy, digital).

How does your Staff ensure that digital records are fully accessible to persons with disabilities?

Does your Staff permit members of the public to visit your facility or facilities to physically examine hard copies (printed) records?

If yes, how does your Staff ensure that public records' examination areas are accessible to persons with disabilities?

Does your Staff offer assistance to persons with disabilities with regard to public records services, e.g. filing, requesting documents, reviewing documents?

If yes, please describe the assistance you offer, including how this assistance is publicized and how the public may make a request for assistance.

Is there anything else you would like to add to your responses here?

When the purchase of new equipment is made, is it reviewed to ensure the equipment is accessible to users with disabilities?

If yes, please describe how accessibility reviews of new equipment are performed.

Are all public documents related to bidding and contracting available to persons with disabilities in alternative format if needed?

Are meetings related to bidding and contracting held in accessible locations?

Is an accessibility plan check done when vendors are conducting improvements in public service areas, Housing Authority housing projects, and/or participating owner buildings?

Is guidance in place for staff and vendors regarding clear space and furniture placement at Housing Authority facilities, including reception areas, lobbies and applicable employee spaces (restrooms, breakrooms, etc.)?

If yes, when was it last updated?

If yes, how does the Housing Authority monitor this?

Do all contracts for new construction hold design professionals to designs that use, at minimum, the most stringent access standards in effect at the time of the project?

Do all contracts for new construction encourage design professionals to exceed the maximum access standards when possible to ensure that construction tolerances are built into the project?

Is a policy in place that mandates CASp inspections at key points of construction and at completion, before final payment is made?

Are major public housing projects reviewed by stakeholders with disabilities during the planning stage?

How are participating owner properties reviewed for accessibility prior to occupancy (when applicable)?

How are participating owner properties reviewed with respect to accessibility during inspections?

How is access ensured during renovation and/or rehabilitation of existing properties?

When purchasing items for installation in accessible housing projects and units, what checks are in place to ensure installation will be compliant with current building standards? (e.g. toilet paper dispensers must be located below the grab bar; clear

space available for a wheelchair user to approach the item for use; applicable reach ranges, etc.)

Please describe how you ensure that purchased and installed items are compliant with current building standards.

Please describe how you ensure that purchased and installed items are maintained so as to ensure current building standards (e.g. waste baskets are not kept in required maneuvering clearances; subsequently installed items do not obstruct clear spaces and reach ranges, etc.)

If purchasing an item that contains an operational part, do you consider accessibility requirements, e.g. ability to operate with one hand; maximum 5lbs operational pressure; no grasping, pinching, and twisting; etc.)?

If yes, please describe how these considerations are made and implemented.

If yes, how do you ensure that any operable part is maintained to remain accessible (e.g. parts do not get rusty, stuck, or otherwise outside operable part accessibility requirements)?

If furniture is purchased, do you consider accessibility factors such as knee clearance for tables and clear space within a room?

If yes, please describe how these considerations are made and implemented.

If yes, please describe how these features are maintained (e.g. items are not placed beneath tables which may obstruct knee clearances, or additional furniture is added to a room which may obstruct clear space).

Is there anything else you would like to add to your responses here?

Does your Staff hold or sponsor events that are available to the public?

Does your Staff have an event planning accessibility checklist to ensure that all public meetings and events are fully accessible?

If yes, please provide a reference list of pertinent documents including the checklist and/or any policies or procedures.

If yes, is this checklist maintained by your Staff or the County?

Do all meeting notices contain an announcement that reasonable accommodations are available for persons with disabilities as needed and/or upon request?

If yes, please provide a copy of the text that is included in all notices of public meetings.

Are all persons who administer public meetings trained in how to respond to requests for reasonable accommodations by members of the public?

If yes, please describe what training is provided, including how often it is provided and how attendance is tracked and recorded.

Does your Staff take steps to ensure that all meetings are held in buildings and rooms that are fully accessible?

If yes, please describe how the physical accessibility of public meeting spaces (including: paths of travel; entrances; circulation routes; registration counters or tables;

building amenities such as water fountains, restrooms and public telephones; and seating) is evaluated and implemented.

Is your Staff trained to set up meeting rooms to provide maneuvering space for persons who use wheelchairs or service animals?

Are the indoor or outdoor surfaces where persons with disabilities will travel smooth, stable and slip resistant?

Are public meetings held on sites that are accessible by public transportation?

If no, please explain why not.

Do public meeting notices contain language indicating that service animals are welcome?

If yes, please provide the text of this notification.

Are service animal relief areas identified before every public meeting?

Are emergency exits identified before every public meeting?

Are stages, speaking platforms, microphones and other items to be used by persons with disabilities accessible? (Note: When considering microphone access please take into account podium elevations, touch screen control systems, gooseneck microphone attached to the center of tables without knee clearance for wheelchair users, and persons who will not be able to hand hold any equipment.)

Do all public meetings have reserved seating for people who use wheelchairs?

Does this reserved seating also include integrated companion seating?

Are all presenters at public meetings trained on best practices for presenting content to persons with disabilities, eg. reading powerpoints aloud?

If yes, how and how often are these trainings offered, and how is attendance tracked and recorded?

Are FM Loop systems (Assistive Listening Devices) available for persons who are hard of hearing?

If FM Loop systems are being used, do meeting hosts ensure that all comments made during the meeting go through the PA system?

If FM Loop systems are used, are all meeting hosts trained on how to operate these?

How often, and how is this training tracked and recorded?

Are sign language interpreters and/or real-time captioners available for all public meetings?

If yes, please indicate how these resources are made known and available to the public.

If yes, is there reserved seating at the front of the room for persons needing these accommodations?

If yes, are sign language interpreters positioned beneath adequate lighting, and close to the speaker?

If yes, are two sign language interpreters retained for meetings or events lasting more than two hours?

If yes, are sign language interpreters and real time captioners provided information before the meeting/event regarding any unusual terms or difficult to spell names that will be part of the program?

What processes are in place to ensure that people with disabilities are able to participate in public speaking at all events, e.g. public comment?

Please describe in detail, and answer the additional questions, below.

If speaker cards are used, is staff available to assist persons with disabilities, as needed, in completing the cards?

Are podiums or dais' used for public speaking or public comment accessible (e.g. lowered podiums, adjustable microphones, etc.)?

If public comment time is limited, is the time increased for persons who have speech impairments?

Do any public events utilize security measures (e.g. magnetometers, wands, bag checks)?

If yes, are Security personnel trained in best practices for conducting security checks of persons with disabilities?

If training is provided, please describe that training, including how and how often it is offered, and how attendance is tracked and recorded.

What processes are in place to ensure that exhibits, displays, and other materials offered to the public are fully accessible?

If events include displays, are the displays accessible and on an accessible route?

If parts of an exhibit are inaccessible due to technical infeasibility, is video with captioning used to display the exhibit?

Are all brochure racks, holders and literature displays accessible to people with disabilities, including, e.g. all materials on an accessible route, with appropriate reach ranges and clear floor space?

Is there anything else you would like to add to your responses here?

Do all of your Staff's printed publications and notices inform readers that the publications are available in alternative formats, if needed, for persons with disabilities?

If yes, is this mandated by the County or specific to your Staff?

If yes, is the notification language standard to the County or created by your Staff?

If yes, please provide a copy of the text offering alternative formats.

Do all of your Staff's printed publications and notices use a certain font type and size for County published documents?

If yes, what font type and size is used?

If yes, is this mandated by the County or specific to your Staff?

Has your Staff reviewed all publications and notices to determine whether they portray persons with disabilities in a demeaning or offensive manner?

If yes, when was this review last performed?

If yes, how regularly is this review performed?

Has your Staff been trained to ensure that all publications and correspondence use “person first language”?

If yes, who provides this training?

If yes, how often are your Staff provided this training, and how is this training tracked and recorded?

Is there anything else you would like to add to your responses here?

When examining plans, does your Staff evaluate accessibility requirements? If yes, please describe how your Staff does this, and please reference any relevant Departmental documentation (e.g. guidelines, checklists, procedures).

During construction, does your Staff evaluate construction sites for accessible paths of travel along public rights of way for persons with disabilities?

If yes, please describe how your Staff does this, and please provide a reference list of any relevant documentation (e.g. guidelines, checklists, procedures).

Does your Staff receive public complaints regarding building accessibility for persons with disabilities?

If yes, please describe how these are submitted to you by the public.

If yes, please provide examples of complaints, including how those were resolved.

If yes, please provide a list of any relevant documentation, including intake forms, internal processes, etc.

Does your Team have any staff or employees who evaluate accessibility of built environments for persons with disabilities?

If yes, please provide supplemental information, e.g. # of FTEs, certifications required, job description(s).

Is there anything else you would like to add to your responses here?

What version of the Web Content Accessibility Guidelines (WCAG) does IT utilize, generally?

How does IT ensure that all digital communications (including but not limited to: websites, webpages, email communications, cloud services, all digital platforms) are accessible to people with disabilities?

Does IT review, design, implement and/or maintain software used by the Housing Authority or the people it services?

If yes, how does IT ensure that this software is accessible to people with disabilities?

If yes, how does IT ensure that any patches, updates and/or upgrades to this software are accessible to people with disabilities?

How does IT ensure that all mobile applications developed on the Housing Authority’s behalf or for use in the implementation of Housing Authority services are fully accessible?

Does IT conduct accessibility checks?

If yes, how encompassing are these checks?

If yes, how often are these checks conducted?

If no, who is responsible for conducting digital accessibility checks?

Have you ever received any complaints regarding a lack of digital / web accessibility by any of your employees, participating owners, or other users?

If yes, please describe, and include how these complaints were resolved.

Does the IT Department offer and/or receive regular training regarding digital and web accessibility?

If yes, please describe the training, including what it covers, how often it is offered, whether it is mandatory, and how a training is tracked and recorded.

Is there anything else you would like to add to your responses here?

Does your Staff and/or your Team affirmatively recruit persons with disabilities for available positions?

If yes, please describe these efforts and outreach.

Do you ensure that all of your job listings are accessible to persons with disabilities? If yes, please describe how this is achieved.

If not you, please describe who is responsible for ensuring that job listings are accessible to persons with disabilities.

Do your Staff and/or your Team's job listings contain a statement of non discrimination against persons with disabilities?

If yes, please provide the text of this statement.

Does your Staff and/or your Team offer candidates for employment the opportunity to request reasonable accommodation?

If yes, please describe how this is done, including references to any pertinent documents and policies.

Are interview panel members trained regarding disability awareness and appropriate interactions with people with disabilities?

If yes, please describe the training, including how often it is offered, and how attendance is tracked and recorded.

If yes, please reference any pertinent documents and policies.

When your Staff conducts employment interviews, is the decision to hire based upon which candidate is best qualified to perform the essential functions of the job with or without reasonable accommodations?

How are the essential functions of a position determined?

Does your Team offer Staff and Employees an opportunity to self-identify as a person with a disability?

If yes, please describe how this is done

If not, please indicate if there is any plan to do so and describe that plan, if applicable.

Do you ensure that all employee events (e.g. holiday parties, trainings, off-site retreats, etc.), are fully accessible?

If yes, please describe how this is done.

If not, please indicate who would be responsible for ensuring this accessibility.

Does your Team offer training on accessibility best practices and/or the ADA to staff, employees and/or volunteers?

If yes, how often is this training offered?

If yes, is this training optional or mandatory?

If yes, how is attendance tracked and recorded?

Do you ensure that all opportunities for advancement and education are available and accessible to Staff and Employees who may have a disability? This includes, but is not limited to certifications, workshops, trainings, conferences, meetings, etc.

If yes, how is this achieved?

Please provide a reference list of pertinent training documents and policies.

Does your Staff and/or Team have a process for employees to request a reasonable accommodation?

Please describe the process overall, including the interactive process.

Please describe how and where documentation regarding these processes are maintained.

Does your Staff and/or Team's reasonable accommodation process include a search for transfer into a vacant, funded role as an accommodation of last resort?

If yes, please list all documentation and guidance regarding this process.

If yes, please describe in detail how this process is implemented, including how long a search is conducted, and what criteria are utilized to determine whether a transfer is appropriate and can be achieved.

If yes, do you require persons seeking this reasonable accommodation to compete for the vacant role?

If reasonable modifications are used to create access, are they approved before they are put in place?

If yes, by whom? Please include name, position and contact information

When reasonable modifications are put in place, are they documented to ensure staff implements them appropriately?

If yes, how is the reasonable modification(s) documented? What information is included in the documentation?

Does your Staff and/or Team ensure that it's facilities and offices are fully accessible?

If no, please indicate who or what Team is responsible for doing so.

Do you have an anti-disability harassment policy?

If yes, when was it last updated?

Is it based upon zero tolerance or the legal definition of disability harassment?

How often is it disseminated to all Staff?

Does your grievance system offer assistance to people with disabilities who, due to their disability, are not able to independently complete the grievance?

Does your grievance system provide timelines when a complainant can expect a result?

Does your grievance system have a second level of review?

If yes, please state the position responsible for this review.

Does your grievance system contain a notice regarding availability of the grievance system in alternative formats: braille, large print, audio?

Does your grievance system contain the name and contact information of the ADA Coordinator?

Has your Staff and/or Team received any complaints or grievances regarding failure to reasonably accommodate and/or lack of accessibility by candidates, employees, or visitors to any of your offices?

If yes, please describe these including how they were resolved.

Does your Staff and/or Team supervise any maintenance staff?

If yes, do maintenance staff receive training regarding maintaining an accessible built environment?

Does your Staff and/or Team have a policy regarding service and/or support animals for its employees?

If yes, please provide a reference list of relevant documents and policies.

Does your office have an ADA Notice of Compliance posted?

If yes, please describe where this notice is posted.

Does your office have a policy in place that prohibits discrimination against people who formerly used drugs illegally and have been through a rehabilitation program?

If yes, when was it last updated?

Based on all of the above, are there areas where you feel training of staff would be beneficial?

If yes, please list the areas of training you think may be useful.

Is there anything else you would like to add to your responses here?

Does your Team/Staff provide any sort of medical and/or mental health services (including but not limited to: referral, treatment, case management, and/or any other supportive services).

If yes, please describe the type of services provided.

If yes, please describe who provides these services (e.g. directly via Housing Authority Staff, through third party service providers, etc.).

If yes, what policies and/or practices are in place to ensure that these services are accessible to people with disabilities?

If yes, how do service providers ensure that materials advertising these services (both print and digital) are accessible to people with disabilities?

If yes, how do service providers ensure that communication methods (e.g. phone, virtual meetings, internet forms) are accessible to people with disabilities?

Is there anything else you would like to add to your responses here?

Does your Staff and/or Team ensure accessibility of any public rights of way (PRoW)? If yes, please describe how you achieve this, including accessibility requirements of sidewalks, parking lots, paths of travel to and from Housing Authority facilities and housing projects.

If yes, please list any policies and/or procedures, and include information on when these were last updated.

If yes, please describe how your Team and/or Staff monitors PRoW for accessibility issues, including but not limited to broken sidewalks, PRoW obstructions (including temporary obstructions), and overhangs into the PRoW that interfere with clear head space.

If yes, does your Team and/or Staff receive complaints from the public regarding inaccessible PRoW?

If yes, how do you ensure that methods for receiving these complaints (e.g. via telephone, web-based forms, email) are accessible to people with disabilities?

Does your Staff have an accessibility construction inspection checklist for use by building code officials/building inspectors as a reference guide to assist with on site inspection of accessibility features and construction elements affecting accessibility compliance to your facilities?

If yes, when was it last updated?

Is there a policy and/or procedure in place ensuring proper maintenance of accessible features?

If yes, when was this last updated?

If yes, how are the relevant staff made aware of these policies and procedures?

If yes, how are these policies and/or procedures enforced?

If yes, please provide a reference list to any pertinent documents, checklists, policies and procedures.

Is there anything else you would like to add to your responses here?

Does your Team and/or Staff have procedures in place regarding the evacuation of persons with disabilities (including staff, employees and the public)?

If yes, please describe and/or provide a reference list of documents regarding those procedures.

If yes, how often are relevant staff trained on those procedures, and how is this training tracked and recorded?

If staff are trained on these procedures, how often is this training updated and/or reviewed?

Does your Team and/or Staff utilize County vehicles for transporting civilians in any instance, including emergency evacuation incidents?

If yes, are transport vehicles equipped to transport persons with disabilities? (Please describe in detail, if applicable).

If yes, are relevant staff trained in how to transport persons with disabilities? (Please describe in detail, if applicable).

Does your Team and/or Staff work in partnership with other entities regarding the setup and administration of evacuation shelters or centers?

If yes, please describe Staff's role in this partnership.

If yes, does the Team and/or Staff have a checklist regarding accessibility at evacuation shelters or centers?

Is there anything else you would like to add to your responses here?

Does your Staff list "711 the California Relay" on business cards and letterheads?

Are your Staff's telephone lines accessible to persons who are DHH?

If yes, please describe how you ensure this accessibility.

If yes, how often are your Staff's telephone lines tested to ensure accessibility?

Has your Staff identified local resources that can provide auxiliary aids for communication as needed?

If yes, please describe.

If yes, please describe how the public is informed of these resources, and how they are informed on how to request them.

If your Staff uses video for any reason or in any forum (e.g. internal employee training, public outreach via the web on social media, YouTube, etc.) is that video captioned?

If yes, please describe how you ensure that video is captioned, including any processes or vendors utilized to caption videos.

If yes, are videos captioned before use, or at some later date after they have been released?

Does your Staff have a policy in place for securing video remote interpreting services (VRI)?

If yes, please describe in detail.

Does your Staff have a Public Information Officer that communicates with the press and releases critical information to the public?

If yes, is an American Sign Language interpreter visible and within the screenshot if television cameras are in use or is a captioning service used?

Do you play videos in public spaces, e.g. waiting rooms or lobbies, for the public?

If yes, are these videos captioned?

Does your Staff use any public address systems?

If yes, how do you ensure that information broadcast by these systems is available to people who may be DHH?

Is there anything else you would like to add to your responses here?

Do all SCHA agreements with service providers that provide programs, services or activities on behalf of SCHA include a provision that holds the service provider to the mandates of Title II of the ADA and California Government Code 11135?

If yes, please list some exemplary agreements, including a reference to the relevant provision.

Do all agreements with service providers who will be providing programs, services or activities on behalf of SCHA include a provision that requires the service provider to comply with federal non-discrimination laws for the FSS?

If yes, please list some exemplary agreements, including a reference to the relevant provision.

Does the SCHA ensure that these provisions are uniformly included in all agreements with service providers?

If yes, please explain how this is done.

Does the SCHA ensure and/or monitor enforcement of this provision? If yes, please explain how this is done.

Does SCHA monitor service providers to ensure those providers have the resources to assist service recipients with disabilities (e.g. persons who may require sign language services)?

If yes, please explain how this is done.

Does SCHA monitor PBV Housing providers to ensure those providers have the resources to assist service recipients with disabilities (e.g. persons who may require sign language services)?

If yes, please explain how this is done.

Are there consequences to a service provider if it is determined that a program, service, or activity provided on behalf of the SCHA failed to comply with the mandates of Title II of the ADA and California Government Code 11135?

If yes, please explain and provide examples.

Are there consequences to a service provider if it is determined that a program, service, or activity provided on behalf of the SCHA failed to comply with federal non-discrimination laws for the FSS?

If yes, please explain and provide examples.

Are recipients of programs, services or activities via service agreements informed of their civil rights in the course of receiving or participating in those services?

If yes, please explain how recipients are notified.

If yes, please list some examples of documentation demonstrating such notification.

If yes, is this notification provided in accessible formats to people with disabilities, e.g. people who may be blind or have a vision impairment?

Is recourse available to recipients of programs, services or activities via service agreements if they believe that their civil rights have been violated by service providers?

How are recipients informed of their right to this recourse?

Please describe the recourse process in detail, including: (a) how SCHA's contract administrator and/or ADA Coordinator would become aware of alleged civil rights violations.

Please describe the recourse process in detail, including: (b) how recipients would bring an allegation of alleged civil rights violation.

Please describe the recourse process in detail, including: (c) how recipients bringing such an allegation could request reasonable accommodations in the process of seeking recourse, e.g., receive assistance to complete a form.

Please describe the recourse process in detail, including: (d) how recipients bringing such an allegation could request reasonable accommodations in the process of seeking recourse, e.g., receive assistance to complete a form.

Please describe the recourse process in detail, including: (e) what services or mechanisms are in place at SCHA to provide reasonable accommodation to a recipient during the process of seeking recourse.

Please describe the recourse process in detail, including: (f) how such an allegation would be investigated.

Please describe the recourse process in detail, including: (g) any interim assistance that could be provided to a recipient alleging violations of their civil rights, e.g. denial of services, or inadequate provision of services.

Please describe the recourse process in detail, including: (h) how such an allegation would be adjudicated, including levels of review, appeals processes and timelines.

Please describe the recourse process in detail, including: (i) potential consequences for any such allegation(s) deemed meritorious.

Please describe the recourse process in detail, including: (i) potential consequences for any such allegation(s) deemed meritorious.

Please describe the recourse process in detail, including: (j) protocols and resources that are in place to ensure that persons with disabilities are fully able to participate in associated proceedings, including, e.g. ASL, captioning, etc..

Please describe the recourse process in detail, including: (k) the official or officials at SCHA that are responsible for investigating, adjudicating and reviewing a decision in this process

How does SCHA conduct outreach to the public and prospective Housing Choice Voucher (HCV) applicants regarding the HCV program?

What does this outreach state regarding the process for submitting these applications?

How does SCHA ensure that this outreach is accessible to people with disabilities, including people who may be Deaf or hard of hearing, have mobility impairments, or may be blind or vision-impaired?

Do HCV Program outreach materials indicate how applications may be made to the HCV program?

How may requests for paper applications to the HCV program be requested?

If paper applications may be requested telephonically, are all phone lines to which these requests might be made compatible with TTY technology?

If paper applications can be obtained at SCHA facilities, are those facilities compliant with applicable ADA and California Building Code (CBC) accessibility requirements?

If paper applications can be obtained at SCHA facilities where built environment compliance requirements either are not clear or have not yet been achieved, what method of equivalent facilitation is in place to ensure that all persons can obtain a paper application, regardless of ability?

Is the online HCV application compliant with Web Content Accessibility Guidelines 2.1 (WCAG 2.1)?

If or when updates are made to the HCV online application form, how are updates checked for WCAG 2.1 accessibility?

How are paper applications for HCV submitted to SCHA?

Are prospective applicants for the HCV program informed that they may receive assistance and/or reasonable accommodation in completing HCV program applications?

Are HCV preliminary applications processed in the order received, or according to the date they were completed and/or postmarked?

If a HCV applicant has submitted a Preliminary Housing Application (PHA) and is subsequently determined to be ineligible due to income, how is that applicant informed of this determination?

How does SCHA ensure that this notification is accessible to people with disabilities, e.g. people who may be blind or vision-impaired?

If this notification is sent digitally (e.g. via email and/or attachment to an email), how does SCHA ensure that this notification is compatible with screen-reading technology?

Does this notification include information on how a determination of ineligibility may be disputed?

Does SCHA notify applicants deemed ineligible that, if they have a disability, they may request a reasonable accommodation if needed in order to fully engage in the dispute process?

If yes, how does the SCHA ensure that this notification is accessible to people with disabilities, e.g. people who may be blind or vision-impaired?

If this notification (of the ability to request a reasonable accommodation) is sent digitally (e.g. via email and/or attachment to an email), how does SCHA ensure that this notification is compatible with screen-reading technology.

How does SCHA ensure that the dispute process is fully accessible to persons with disabilities, e.g. people who are blind or vision-impaired, people who are Deaf or hard of hearing, or people who use a wheelchair and/or have mobility impairments?

If a person with a disability successfully disputes an ineligibility determination, how are they informed?

How does SCHA ensure that such notifications are accessible to people with disabilities, e.g. people who are blind or vision-impaired?

If notification of a successful dispute is made digitally (e.g. via email and/or attachment to an email), how does SCHA ensure that this notification is compatible with screen-reading technology?

After a person with a disability has successfully disputed an ineligibility determination, how does SCHA ensure that they are returned to their original spot on the waiting list?

Are there any other steps that the SCHA takes to ensure that people with disabilities who have successfully disputed an ineligibility determination are processed in the original order they appeared on the HCV waiting list?

If yes, please list those here.

How does SCHA ensure that Project Based Voucher housing providers process applicants for vacant units in the order that they appear on the HCV waiting list, including applicants who have successfully disputed an ineligibility determination?

How does SCHA ensure that all marketing materials include a statement offering the opportunity to request a reasonable accommodation?

Please list examples of marketing materials which include this statement.

Please provide the text of this statement, included in marketing materials.

How does SCHA ensure that all program materials include a statement offering the opportunity to request a reasonable accommodation?

Please list examples of program materials that include this statement.

Please provide the text of this statement, included in program materials.

How does SCHA ensure that all other vital documents include a statement offering the opportunity to request a reasonable accommodation?

Please list examples of other vital documents that include this statement.

Please provide the text of this statement, included in these documents.

Has SCHA changed its Administrative Plan to ensure compliance with the 2004 HUD and Department of Joint Statement on Reasonable Accommodations?

Has SCHA changed its policy and practices to ensure compliance with the 2004 HUD and Department of Joint Statement on Reasonable Accommodations? (If SCHA's policies and practices are the same as its Administrative Plan, please treat these terms as interchangeable for all survey questions).

Does SCHA permit verification of a disability to be provided by a doctor, other medical professional, a peer support group, a non-medical service agency or a reliable third party, who is in a position to know about the person's disability?

If not, how does SCHA permit or require verification?

In verifying a disability and/or request for accommodation, does SCHA inquire regarding the nature and severity of the person's disability?

If yes, please describe the nature of this inquiry and SCHA's need for this information.

How are SCHA employees informed regarding SCHA's policies and practices with respect to verifying a disability?

How does SCHA ensure that its employees do not make inquiries regarding disability verification that exceed what is permitted by the 2004 HUD and Department of Joint Statement on Reasonable Accommodations?

How does SCHA ensure that its service providers do not make inquiries regarding disability verification that exceed what is permitted by the 2004 HUD and Department of Joint Statement on Reasonable Accommodations?

What SCHA policies and practices are in place regarding the evaluation of the nexus between a disability and requested accommodation?

How are SCHA employees informed of SCHA's policies and/or practices with respect to evaluating the nexus between a disability and requested accommodation?

Do SCHA policies and/or practices provide guidance to SCHA employees who are unsure regarding the nexus between a disability and requested accommodation?

If yes, please describe.

What policies and/or practices are in place to ensure that SCHA employees consistently implement its reasonable accommodations policy when evaluating the nexus between the disability and the accommodation requested? (For example, does SCHA have guidelines or a checklist for employees to follow when engaging in this aspect of the interactive process?)

What policies and/or practices are in place to ensure that SCHA employees consistently implement its reasonable accommodations policy when evaluating the nexus between the disability and processing requests for extensions of time to use a voucher?

What policies and/or practices are in place to ensure that SCHA employees consistently implement its reasonable accommodations policy when evaluating the nexus between the disability and exceptions to the payment standards?

How does SCHA audit itself (if at all) to ensure that it consistently implements its reasonable accommodations process with regard to determining a nexus between disability and the requested accommodation?

How does SCHA audit its service providers (if at all) to ensure that it consistently implements its reasonable accommodations process with regard to determining a nexus between disability and the requested accommodation?

How does SCHA track program participants with verified disabilities who may require reasonable accommodation?

How does SCHA ensure that information regarding approved accommodations is communicated internally, as well as to pertinent service providers?

How does SCHA ensure that information regarding a person's disability is kept confidential?

Does SCHA require persons with verified disabilities to provide ongoing verification?

How often do SCHA employees receive training regarding SCHA's policies and practices around receiving, evaluating, and tracking requests for reasonable accommodation from program participants.

Is there anything else you would like to add regarding this line of survey questions before moving on to the next section?

How does SCHA identify accessible units and/or units with accessibility features (whether vacant or not)?

What outreach does SCHA conduct to attract owners with accessible units to participate in the HCV program?

How and how often is this outreach conducted?

How and how often are housing providers prompted to identify accessible features (e.g. ramp/elevator access, visual/audible alarm systems, accessible parking spaces) when listing vacant units

How does SCHA keep track of accessible units, including any specific features (e.g. ramp/elevator access, visual/audible alarm systems, accessible parking spaces)?

How and how often does SCHA update its list of accessible units?

How and how often does SCHA review its available unit list to ensure there is a range of accessible unit sizes?

How and how often does SCHA take steps to ensure that owners and managers of accessible units provide information regarding the availability of accessible units to persons with disabilities?

How and how often does SCHA communicate to participants regarding accessible units that are not only in existence, but also available?

When issuing a housing voucher to a family with disabilities, does SCHA include a current listing of known available accessible units (including any specific features)?

If yes, please describe how this is done.

When issuing a housing voucher to a family with disabilities, does SCHA include a current listing of known available accessible units?

What steps does SCHA take to maximize the utilization of accessible units by persons with disabilities requiring the accessible features of such a unit?

How does SCHA ensure that vacant, accessible units are FIRST offered to occupants with disabilities of another unit of the same project or comparable projects who are not occupying accessible units?

How does SCHA ensure that, after first offering vacant accessible units as described above, those units are THEN offered to applicants with disabilities on the waiting list who have a need for such a unit?

How does SCHA ensure that a person with a disability is able to request an accommodation, if needed, in order to search for or indicate a desire for placement in an accessible unit?

What training does SCHA provide its staff to assist participants with their search for accessible units?

How and how often is this training provided to SCHA staff?

Is there anything else you would like to add regarding this line of survey questions before moving on to the next section?

Has SCHA amended its ADA (Section 504) grievance procedures to include notifying an individual of the right to file a complaint with the state or federal government against SCHA without first filing with (or notifying) the SCHA?

If yes, how are individuals informed of this right?

If yes, please provide the notification text.

Does SCHA notify individuals of its ADA (Section 504) grievance policy on all forms and documents used to communicate a decision that is unfavorable and/or has an adverse impact on them (including denial of a requested reasonable accommodation)?

If yes, please provide examples.

If yes, please provide the notification text.

Is SCHA's online ADA (Section 504) grievance form compliant with WCAG 2.1?

If yes, how does SCHA ensure compliance when updates are performed?

When reviewing SCHA's online ADA (Section 504) grievance form, are people notified of the option to obtain a form at SCHA reception office?

Has SCHA posted its ADA (Section 504) grievance policy at all reception desks?

Does SCHA have an ADA (Section 504) grievance form available at all reception desks?

If yes, are SCHA staff trained on how to provide assistance to people with disabilities who help to complete this form?

What SCHA policies and practices are in place to ensure that PBV housing providers have ADA (Section 504) grievance procedures available?

How does SCHA monitor PBV housing providers to ensure that ADA (Section 504) grievance procedures are available?

Does SCHA ensure that any complaint alleging violation of the ADA is heard by a hearing officer knowledgeable about Section 504?

If yes, please describe how this is done.

Does SCHA ensure that Hearing Officers evaluate whether a requested reasonable accommodation may pose an undue financial burden?

If yes, please describe how this is done.

Does SCHA ensure that Hearing Officers evaluate the nexus between a disability and a requested reasonable accommodation?

If yes, please describe how this is done.

Are hearing officer's decisions communicated in format(s) - including digital formats - that are accessible to people with disabilities, e.g. people who are blind or have vision impairments?

If yes, please describe how this is done.

Is there anything else you would like to add regarding this line of survey questions before moving on to the next section?

Does SCHA main office have posted a one-page non-discrimination notice in English and Spanish that includes the 504 Coordinator's name and contact telephone number?

If yes, is this notice posted in a location easily accessible to the public?

If yes, is this notice posted at a height that is readable for wheelchair users?

Does SCHA provide a notice of its non-discrimination policy in all meeting notices?

If yes, please provide the text of this notification.

Does SCHA provide a notice of its non-discrimination policy in all program informational materials available to the public, applicants and participants?

If yes, please provide the text of this notification.

Does SCHA monitor its service providers (with 15 or more employees) to ensure compliance with Section 504's non-discrimination notice requirements?

If yes, please describe how this is done.

Does SCHA monitor its service providers (with 15 or more employees) to ensure that Section 504's non-discrimination notice requirements are included when those service providers update their program information, advertising and marketing materials?

If yes, please describe how this is done.

Are there any areas of inquiry you believe this survey has missed? If so, please list those here.

If there is anything else you would like to add regarding the questions in this survey, please state it here.

If there is anything else you would like to add regarding SCHA's efforts to be not only in compliance with ADA (Section 504) and accessibility best practices, please state it here.