



**UPPER EXPLORERLAND REGIONAL PLANNING COMMISSION
325 WASHINGTON STREET
DECORAH, IA 52101
563-382-6171**

**SECTION 504
SELF-EVALUATION AND TRANSITION PLAN**

**Date of Review: 5/12/2014
Completed By: Mary Lynn ReVoir, Consultant**

Introduction

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications.

Section 504 of the Rehabilitation Act of 1973 (Section 504) and its implementing regulation, issued by the U.S. Department of Agricultural, Title 7 Code of Federal Regulations (CFR), Part 15b, require every Intermediary to conduct a Self-Evaluation and if needed, a Transition Plan.

Upper Explorerland Regional Planning Commission (UERPC) has conducted a comprehensive Section 504 Self-Evaluation of its policies, programs, and facilities, along with establishing a Transition Plan, to determine the extent to which individuals with disabilities may be restricted in their access to services and activities. The Self-Evaluation and Transition Plan is significant in that it establishes a commitment to the development and maintenance of policies, programs, and facilities that include all of its citizenry. There are two types of accessibility: physical accessibility and program accessibility. Absence of discrimination requires that both types of accessibility be provided.

A public involvement process assisted in the development of the Self-Evaluation and Transition Plan. In order to obtain input from the public representing residents with a disability, UERPC invited clients served by Winneshiek County Case Management and Team Rehab to meet with staff members and consultants to review the plan and provide comment. The Self-Evaluation and Transition Plan was facilitated by a consultant trained in ADA Regulations and experienced in Section 504 Evaluations. This document is made available for public inspection and will be maintained on file at the UERPC office for a period of three years.

Programmatic accessibility includes all policies, practices, and procedures that permit people with disabilities to participate in programs and to access important information. Program accessibility requires that individuals with disabilities be provided an equally effective opportunity to participate in or benefit from a public entity's programs and services. An evaluation of UERPC policies, programs, and procedures was conducted to determine current levels of service and the extent to which its policies and programs created barriers to accessibility for persons with disabilities. UERPC department staff provided information on the nature of the program, forms, and methods used to advertise each program's services and activities, a profile of current participants, the types of equipment and materials used, testing and entrance requirements, the level of staff training, and any special modifications provided. UERPC addressed agency wide programmatic accessibility barriers by reviewing policies or practices in the following areas: Non-Discrimination on the Basis of Disability, Programs, and Services, Public Meetings, Communications, and Staff Training.

Physical Accessibility addresses areas to ensure that buildings and facilities are accessible to and usable by people with disabilities. Design guidelines to achieve accessibility have been developed and are maintained by the U.S. Access Board under the jurisdiction of the ADA. The ADA Accessibility Guidelines (ADAAG) covers a wide variety of facilities and establishes minimum accessibility requirements for new construction and alterations to these facilities. Barriers include any obstacles that prevent or restrict the entrance to or use of a facility.

A survey of architectural barriers in its buildings and facilities was conduct during the Self-Evaluation and Transition Plan process. Only those areas open to the public were surveyed at the following locations where UERPC provides services:

UPPER EXPLORERLAND REGIONAL PLANNING COMMISSION

Date:

5/12/14

SECTION 504: UERPC Self-Evaluation

UERPC locations audited listed below:

West Greene Street, PO Box 219	Postville, IA 52162-0219	Phone: 563-864-7551	Fax: 563-864-7535
325 Washington Street	Decorah, IA 52101	Phone: 563-382-6171	Fax: 563-382-6311

UERPC Staff: Lori Brockway, Lisa Lensing, Fern Rissman, Carla Organist, Rachelle Howe

(Identified corrective action will be listed on the Transition Plan following the audit.)

#	A. General Provisions	Findings	Corrective Action Recommendations
1	Has agency filed an assurance form with OCR (HEW-641) stating the agency will not discriminate on the basis of handicap in employment and in the provision of services?	Agency does not have an agency P&P manual but they have taken steps to incorporate nondiscriminatory language throughout the daily operations and with variety of stakeholders (customers, board members, general public, and employees). Agency will add statement to the finance manual.	
2	If agency employs 15 or more persons, is an employee designated as Section 504 Coordinator?	Executive Director. All staff are informed during annual Section 504 training.	
3	Has agency taken measures to notify applicants for employment and services, employees, unions, or professional organizations with whom they have collective bargaining or professional agreements of the policy of nondiscrimination policy on the basis of handicap?	A written statement of the Nondiscriminatory policy has been expanded and included throughout many written documents. Most of the agencies contracts are with government entities, which as contractors/subcontractors would have nondiscrimination policies existing.	Recommended as UERPC renews contracts add nondiscriminatory language to the contract template. Nondiscriminatory language will be added to the bidding process instructions.
4	Has agency notified the above mentioned groups of the name of Section 504 Coordinator?	Employees are informed during new hire orientation and annual Section 504 training.	Recommend to add the name of the Section 504 Coordinator to written contracts with a statement such as: "UERPC services are follow a nondiscriminatory policy and UERPC requires compliance from all contractors/subcontractors. Questions can be directed to the UERPC Executive Director, who

			serves as the UERPC Section 504 Coordinator.”
5	Are steps taken to ensure the notice was equally available to persons with impaired vision or hearing?	The Section 504 Desktop aid is available for staff to provide resources as needed to assure notice is available to all persons.	
6	Does the notice of nondiscrimination appear in recruitment materials and publications including website?	Yes. (Public notices, service publications, website)	
7	If agency employs fifteen or more persons, is a due process grievance procedure adopted for employees and for applicants and customers?	Yes. For employees stated in personnel manual. For customers in service plan or service description.	

#	B. Employment	Findings	Corrective Action Recommendations
1	Does agency currently have a written statement of its policy of nondiscrimination in employment on the basis of handicap for applicants?	Yes.	
2	How does the agency disseminate this statement to applicants?	Included in the posting of jobs.	
3	How does the agency disseminate this statement to employees?	In the personnel policy, desktop aide has resources, reviewed at annual Section 504 training.	Consider to expand this information at new employee orientation.
4	How does the agency disseminate this statement to general public?	Statement of such included on all recruitment efforts addressing the general public.	
5	How does the agency inform this policy to recruitment staffing agencies?	Has used Manpower and has contract.	UERPC will add an EEOC statement to the UERPC employment statements on staffing agency contracts.
6	Are steps taken to ensure that notice regarding your policy of nondiscrimination in employment was equally available to persons with impaired vision or hearing?	The Desktop aid provides resources for staff to use to accommodate requests. They have added 711 whenever phone # posted. UERPC requested example of language to use on written and electronic communication. Such as: “UERPC is nondiscriminatory agency. Ancillary aids and services will be available upon	

		request for a person with a disability.”	
7	Are recruitment sites accessible to persons with mobility impairments?	Recruitment strategies include agency website, local newspaper, local job center, and staffing agency. Applicants are directed to submit electronically or in person at agency locations.	<p>Recommend to contact Iowa Department for the Blind and ask for their assistance to determine the level of accessibility if a person uses a screen reader to complete an UERPC electronic application. Action will be determined by the results learned.</p> <p>Recommend to add a statement to the website page http://uerpc.org/job-opportunities.html about employment applications such as “For individuals with a disability who need an accommodation to make an application for employment, please call or email the UERPC Section 504 Coordinator: xxxxxxxxxx”</p>
8	Has the agency established contact with rehabilitation agencies to recruit or seek advice?	No, but it was discussed to include any job opening notice to the local VR and Dept for Blind counselors	Consider adding local VR and Dept for the Blind counselors to UERPC employee recruitment locations.
9	Is recruitment materials, advertisements, etc., equally available to persons with disabilities?	If agency included the Dept for Blind to the recruitment locations this would make postings known to those with visual impairments.	Recommendations: 1) add local Dept for the Blind counselor to recruitment locations, and 2) add statement to website - #7 above)
10	Are job descriptions truly descriptive of the work to be performed?	Yes	
11	Are all the tasks in the job description outlined essential to the performance of the job?	Yes	
12	Does agency job application ask medical history questions?	No	
13	Does job application include questions relating to Worker’s Compensation?	No	
14	If testing is conducted with application process, is each applicant administered a job related test? If yes are modifications available for certain portions (e.g. use of brailers by persons with visual impairments; use of translators or typed material to provide information on test instructions to persons with hearing	UERPC conducts no testing	

	impairments; revision of test content for persons with visual impairments; and the provision of other accommodations to persons who cannot take written tests or make the marks required for mechanically scored objective tests)?		
15	In any pre-employment interview or application, is information requested as to whether the applicant has a disability? Are applicants informed that any information they choose to provide will remain confidential and will be used solely in connection with remedial, voluntary, or affirmative action efforts? Are procedures in place to ensure that such information remains confidential?	No	
16	Do reference checks include inquiries about disabling conditions?	No	
17	Are pre-employment physical examinations required for applicants who have not received conditional offers of employment?	None conducted	
18	Are mandatory physical examinations given upon a conditional offer of employment done so for both applicants who disclose a disability and those who do not?	None conducted	
19	Is information regarding medical history kept confidential with the exception of: a. Supervisors and managers for purposes of reasonable accommodation b. First aid/safety personnel c. Government officials investigating compliance?	Yes – locked	
20	Are steps taken to ensure that following components of personnel action does not discriminate against employees who have disclosed a disability? Promotion, Probation, Demotion, Transfer, Layoff, Termination, Right of return from layoff, Rehiring, Time off benefits, Seniority rights	Yes – noted on the UERPC job openings website page	

#	C. Services	Findings	Corrective Action Recommendations
1	Are procedures used for determining eligibility for services different for customers with a disability than for non-disabled peers?	No Other contractual parties assume same also.	

2	Are admission, application or enrollment forms require information on disabling conditions which are used to deny such admission or enrollment?	The question is optional and only being asked for it enhances opportunity, which is explained to individual.	
3	Are employees provided training to accommodate persons with a variety of disabilities?	Training held 5/11/14 and held on annual basis and as part of new hire orientation.	
4	Are persons with impaired sensory or speaking skills provided with effective notice of benefits and services offered?	All notices of benefits and services are provided to individuals and if alternative method is needed, staff will provide.	
5	Are procedures or tools / resources available for effective communication with customer with a disability?	With annual staff training and having the resource of the desktop aid, the UERPC staff knowledge and comfort level has increased on how to provide information in a variety of different formats	
6	Do emergency plans address the need of safety for customers who have hearing or visual impairment?	The UERPC Safety Plan was updated June2012 and new information was added to address safety of customers (conduct drills, exits light, flashlights, safety maps displayed)	
7	Is there a tagline stating “Auxiliary aids and accommodations will be provided upon request by individuals with a disability”?	UERPC has done a great job creating a safe environment to disclose a disability. They added tagline to business cards, website, tagline email, brochures, application, and letterhead.	
8	Does agency have a procedure if an accommodation is requested?	No procedure is written. An example will be shared with UERPC for consideration.	Recommend for UERPC write a procedure and add it to the desktop aid, plus review at annual training with all staff. (See attachment “Accommodation Customers Disability” for an example of procedure.)
9	How does a person who is deaf/hard of hearing contact your office? Is this published?	Added 711 to phone # postings, email addresses are provided on the website	Add ancillary tagline to website home contact page.

10	How does agency provide materials in alternative format for a person who is blind?	The UERPC Desktop aid has instructions of resources	
----	--	---	--

#	D. Physical Plant: Review both office locations	Findings	Corrective Action Recommendations
1	Are accessible parking spaces approximate to the facility?	Yes	
2	Are accessible spaces available in ratio to the other parking spaces? Ratio 1:25	Yes (more than required ratio)	
3	Are parking spaces open on one side, allowing room (12'-6" minimum width) for individuals in wheelchairs or on braces and crutches to get in or out onto a level surface?	Yes	
4	Are signs posted indicating "Handicapped Parking"?	Yes. Decorah office signage was added since last report.	
5	Are walks of a continuing common surface not interrupted by steps or abrupt changes in level?	Yes	
6	Do walks have a level platform extending at least one foot beyond each side of the doorway at the top of which is (a) at least 5x5' if a door swings out onto the platform or toward the walk, or (b) 3x5' if door does not swing onto the platform?	OK. There is no platform	
7	Do ramps have a slope no greater than 1' rise in 12'?	Yes. No ramp at Decorah.	
8	Do ramps have handrails on at least one side? Are they 32" in height measured from the surfaces of the ramp? Are the surfaces smooth? Do they extend one foot beyond the top and bottom of the ramp?	NA	
9	Do ramps have a surface that is nonslip?	NA	
10	Do ramps have at least 5' of straight clearance at the bottom?	NA	
11	Do ramps have level platforms at 30' intervals for purposes of rest and safety, where they turn?	NA	
12	Is at least one primary entrance to each building usable by individuals in wheelchairs?	Yes. Door bells have been added at both locations.	Recommendation: as doors are replaced install electronic open door models.
13	Is at least one entrance usable by individuals in wheelchairs on a level that would make the elevators accessible?	NA – no elevators	
14	Do doors have a clear opening of no less than 32" when opened?	Yes	

15	Are doors operable by a single effort? Are the doors operable with pressure or strength with use of one arm?	Questionable, but door bells are available for assistance.	
16	Is the floor on the inside and outside of each doorway level from a distance of 5' from the door in the direction of the door swing?	Yes	
17	Are sharp inclines and abrupt changes in level avoided at door sills?	Yes	
18	Do steps avoid abrupt nosing? Do stairs have handrails 32" high as measured from the tread at the face of the riser? Do stairs have at least one handrail that extends at least 18" beyond the top and bottom step? Do steps have risers 7" or less?	NA – no steps	
19	Do floors have a nonslip surface? Is carpeting easily maneuverable for a person who uses a wheelchair?	Yes. New carpet installed at Decorah office and met ADA.	
20	Is there an appropriate number of toilet rooms for each sex accessible for persons who use wheelchair/crutches?	Yes	
21	Do toilet rooms have turning space 60x60 to allow traffic of individuals in wheelchairs?	Yes meet ADA	
22	Do toilet rooms have at least one toilet stall that: a. Is three feet wide? b. Is at least 36"x66" if wall hung water closets? c. Have a door that is 32" wide and swings out? d. Have grab bars on each side, 33" high and parallel to the floor, 1-1 1/2" diameter, and with 1 1/2" clearance between rail and wall, fastened securely to the wall at the ends and center? e. Have width at least 48" between the wall and the front of the stall entrance? f. Have water closet with seat at a minimum of 16 1/2" or maximum of 19 1/2" from the floor?	Yes meet ADA	
23	Do toilet rooms have lavatories with narrow aprons, which when mounted at standard height, are usable by individuals in wheelchairs?	Yes meet ADA	
24	Are drain pipes and hot water pipes covered or insulated?	Yes	

25	Are mirrors and shelves at a height as low as possible and no higher than 40" above the floor?	Yes	
26	Are towel dispensers/ soap dispensers mounted no higher than 40" from the floor?	Yes	
27	Water Fountains 1. Are they accessible to individuals with a physical disability? (You may use cups to facilitate accessibility.) 2. Do water fountains or coolers have upfront spouts and controls? 3. Are they hand operated? 4. If coolers are wall mounted, are they hand operated, with basins 30" or less from the floor? 5. If there are floor mounted fountains, are spouts no higher than 30"?	No water fountains	
28	1. Is there an appropriate number of public telephones accessible to individuals with a physical disability? 2. Is height of the dial from floor 48" or less? 3. Is coin slot located 48" or less from the floor? 4. Are telephones equipped for persons with hearing disabilities? 5. Are specially equipped telephones identified?	No public phones	
29	1. If more than a one-story building, are elevators accessible? 2. Are all the controls 48" or less from the floor? 3. Are the buttons labeled with raised (or indented) letters beside them? 4. Are buttons easy to push or sensitive to touch? 5. Is the elevator cab at least 5x5 ft.?	No elevators	
30	Are switches and controls for light, heat, ventilation, windows, draperies, fire alarms and all similar controls of frequent or essential use within reach of individuals in wheelchairs?	Will accommodate as needed.	
31	Are raised or recessed letters or numbers used to identify rooms or offices?	Some Braille signage at Postville (bathroom).	Check Decorah for Braille signage was installed.
32	Are audible warning signals accompanied by simultaneous visual signals for the benefit of those with hearing or sight disabilities?	No audible warning signals but the customer area in both offices is very small and staff is always	

		present to assist customers.	
33	Are there low hanging door closers that remain within the opening of a doorway, or that protrude hazardously into regular corridors or traffic ways?	NA	
34	Are exit signs easily identifiable to all customers with a disability?	Exit signs are now lit.	Check if exit signs are viewable by all customers, height posted.

TRANSITION PLAN

Prepared for UERPC on May, 12, 2014

#	Corrective Action Recommendations	Responsible Party:	Date Completed.
1	As UERPC renews contracts add nondiscriminatory language to the contract template. Add nondiscriminatory language to the bidding process instructions.		
2	Add the name of the Section 504 Coordinator to written contracts with a statement such as: "UERPC services are nondiscriminatory and UERPC requires compliance from all contractors/subcontractors. Questions can be directed to the UERPC Executive Director, who serves as the UERPC Section 504 Coordinator."		
3	Add an EEOC statement to the UERPC employment statements on staffing agency contracts.		
4	Contact the Iowa Department for the Blind and ask for their assistance to determine the level of accessibility if a person uses a screen reader to complete an UERPC electronic application. Action will be determined by the results learned.		
5	Add a statement to the website page http://uerpc.org/job-opportunities.html about employment applications such as "For individuals with a disability who need an accommodation to make an application for employment, please call or email the UERPC Section 504 Coordinator: xxxxxxxxxxxx"		
6	Add local VR and local Dept for the Blind counselor to recruitment locations		
7	Write a practice on processing accommodation request and add it to the desktop aid, plus review at annual training with all staff. (See Attachment A below for an example of procedure.)		
8	Add ancillary tagline to website home contact page.		
9	As doors are replaced install electronic open door models.		
10	Check Decorah for Braille signage was installed.		
11	Check if exit signs are viewable by all customers, height posted.		
12	Upon completion of Transition Plan of Action, inform all staff as appropriate		

Attachment A: Accommodation Request

Reasonable Accommodations

- The Americans with Disabilities Act of 1990 (ADA) requires employers and service providers to provide reasonable accommodations to qualified employees and applicants with disabilities, unless such accommodations would pose an undue hardship (e.g. too costly, too extensive, too substantial, too disruptive).
- Reasonable Accommodations are modifications or adjustments which allow a person with a disability to enjoy the same benefits of employment/services as people without disabilities, such as more intensive staff assistance, provision of a sign language interpreter, etc.
- In general, the applicant or employee with a disability is responsible for letting the employer/service provider know that an accommodation is needed to participate in the application process, to perform essential job functions, or to receive equal benefits and privileges of employment. Employers/service providers are not required to provide accommodations if they are not aware of the need. Proof of a disability may be required to be submitted with the request. There may be program rules that require proof or employers may require proof; other times it be discretion of the agency.
- The Equal Employment Opportunity Commission (EEOC), the federal agency charged with enforcing the ADA, suggests, but does not require, that individuals with disabilities use a written accommodation request in the event there is a dispute about whether or when they requested accommodation. The ADA does not include specific guidelines or forms for requesting reasonable accommodations. Employers often design their own form and employees/consumers should use the employer's forms for requesting accommodation. Otherwise, individuals with disabilities can use any method that is effective.

Example of Reasonable Accommodation Request Process:

1. Form is completed by customer or staff assisted if by phone, e-mail or assistance requested.
2. Request form is given to receptionist or agency representative and typically routed to the supervisor.
3. The agency determines if accommodation is reasonable according to their guidelines.
4. The agency notifies customer of receipt of request and discusses arrangements or notifies them of denial of request by the end of five (5) full working days of receiving the request. If denial is determined, notification of denial must also be made in writing with information about appeal process.
5. The agency details communication with customer and arrangements for Reasonable Accommodation. Reasonable Accommodation requests are kept on file in their office(s).

Example of Reasonable Accommodation Request Form

Individuals with disabilities needing a reasonable accommodation to access services are asked to complete the Reasonable Accommodation form. The agency will make a determination of your request by the end of five full business days. In some cases this will happen sooner. We will then notify you of our decision. Every effort will be made to secure the accommodation as soon as possible but please be advised that some approved requests will take a reasonable amount of time to complete.

Date of Accommodation Request: ____/____/____

Name: _____

Address: _____

City/State/Zip: _____

Phone Number: _____

Accommodation Requested (check all that apply):

- ASL Interpreter Services
- Program Modification (explain below)
- Assistive Technology/Auxiliary Aids (explain below)
- Alternative Format Materials:
(Circle: Braille, Audio Recorded, Enlarged Print, Electronic)
- Reader/Assistance Completing Documents/Note Taker
- Other: _____

Briefly explain what we can do for you and what agency do you need service from

TO BE COMPLETED BY STAFF: Staff Member Taking Request: _____

Will Accommodation be Provided? Yes / No Date Approved: ____/____/____

Accommodation Approved by: _____

Agency Providing Accommodation: _____

Estimated Cost: _____

How will Accommodation be Provided?

If not approved – why?
