**August 2012**

Job Corps

Center Accessibility Tool



Centers are required to develop a center accessibility/barrier removal plan that describes the current programmatic and architectural accessibility of the center. To develop this plan, centers should complete the***Center Accessibility Tool*** *(the tool below) and the* ***Americans with Disabilities Act Checklist for Readily Achievable Barrier Removal*** and use the results to develop an accessibility plan.

The ***Center Accessibility Tool*** serves as a guide to assisting staff in improving the overall accessibility of their centers. A suggested practice for the disability coordinators (DCs) is to send the specific questions in the tool to corresponding staff members working in that particular area and request that they complete their section of the tool. This provides a way to delegate the responsibilities of the Disability Program to other center staff and to promote a center-wide consciousness of the program components that may not be currently accessible. When completing this tool, if the center finds additional review items for the specific areas, add them to the end of each section. For example, in the Residential section, your center found additional areas to review for accessibility; you can add those additional items to the end of that section.

After completion of this tool, use your findings (along with those from the ***Americans with Disabilities Act Checklist for Readily Achievable Barrier Removal***) to develop a center accessibility plan (see the sample planavailable on the Job Corps Disability website). The plan should be focused on readily achievable barrier removal—things center staff can do to make the center more accessible that are easily accomplishable and able to be carried out without much difficulty or expense. The plan should be used as a tool to get center staff to think about the simple things that can be done to ensure that students with disabilities can access/participate in the program on an equal basis with students without disabilities. *This plan is not intended to be used to determine compliance for new construction or facilities being altered and is separate from the center’s facility survey requirement in PRH 5:5.10.* Ensure the plan is reviewed and updated on an annual basis

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| Recruitment | | | | |
| **Review Item** | **Yes** | **No** | **Possible Solutions** | **Actions/Next Steps (if any)** |
| 1. Do recruitment materials include images of people with disabilities? |  |  | Find stock photos online of people with disabilities or with their permission include pictures of students with disabilities on center that may have obvious disabilities or are confident in their own abilities and want to support awareness and sensitivity on center. Add them to your materials. |  |
| 1. Do center recruitment materials indicate a commitment to including people with disabilities? |  |  | Print “reasonable accommodations provided upon request,” “this document is available in accessible formats on request,” “persons with disabilities encouraged to apply” on all materials, as applicable. |  |
| Administrative Practices | | | | |
| **Review Item** | **Yes** | **No** | **Possible Solutions** | **Actions/Next Steps (if any)** |
| 1. Has the center director designated a staff person to coordinate disability activities? |  |  | Designate the health and wellness manager (HWM) and the academics manager as co-DCs |  |
| 1. Has your center’s equal opportunity officer established a procedure to handle disability-related complaints? |  |  | Include this procedure in your SOP for all staff to view |  |
| 1. Are records maintained regarding any complaints and/or actions taken by or on behalf of students with disabilities? |  |  | Keep log |  |
| 1. Are nondiscrimination and equal opportunity discussed during orientation, including the process for filing a complaint? |  |  | Provide information in a student handout or brochure |  |
| Dissemination of Information | | | | |
| **Review Item** | **Yes** | **No** | **Possible Solutions** | **Actions/Next Steps (if any)** |
| 1. Has your center developed methods of notification to inform employees and students of the existence and locations of services, activities, and facilities that are accessible to people with disabilities (including vision impaired and hard of hearing)? |  |  | * Include information about accessibility in new employee orientation materials * Conduct center tours for new staff identifying and explaining types of access and why that access exists * During new student orientation tours, identify the various features of the center and types of programs and activities. Remind students that if they are an individual with a disability, they may request reasonable accommodation, if needed, to participate in the programs and activities of the center. |  |
| 1. Does the center include a notice in all written announcements that it does not discriminate against persons with disabilities? |  |  | Review this tool on a quarterly basis and no less than annually to review the center’s progress toward improved accessibility and inclusiveness for students with disabilities. |  |
| 1. Are articles on the accomplishments of students with disabilities publicized in center publications? |  |  | Students with disabilities should not be identified in publications as such without their consent; however include success stories about public figures with disabilities in center publications or have the DC ask students with disabilities if they would like to share their success story. |  |
| 1. Are meetings with all staff conducted periodically to foster understanding, acceptance, and support of disability-related policies? |  |  | * Offer 15 minute sessions before or after training day to include topics such as how to implement accommodations throughout all departments of the center * Sponsor brown bag lunch sessions, center staff work groups, etc. that focus on information and training about cultural diversity, the abilities of people with disabilities, and center inclusiveness progress and goals |  |
| 1. Are posters recognizing the rights of people with disabilities prominently displayed for staff and students to read? |  |  | Visit <http://www.disabilityisnatural.com> to find various diverse paraphernalia and signage to put up around the center  Visit <http://promotions.usa.gov/odep.html> to order free disability awareness posters from ODEP |  |
| Contracts & Agreements | | | | |
| **Review Item** | **Yes** | **No** | **Possible Solutions** | **Actions/Next Steps (if any)** |
| 1. Has your center fulfilled its written assurance, as part of their contract that their actions will comply with all relevant disability legislation? |  |  | * Determine whether or not the center has implemented all of the PRH Disability Program requirements, correct or adjust as necessary * Conduct staff and student surveys about the provision and receipt of services to students with disabilities. Review results and apply corrective action, as necessary. * Review career technical program enrollments and ensure that students with disabilities have access to the same program options as students without disabilities |  |
| 1. Are nondiscrimination clauses included in contract agreements? |  |  | Update center materials to reflect center’s commitment to nondiscrimination practices |  |
| 1. Are nondiscrimination clauses included in all union agreements? |  |  | Update memorandum of understanding to include nondiscrimination clauses if none exist |  |
| Reasonable Accommodation | | | | |
| **Review Item** | **Yes** | **No** | **Possible Solutions** | **Actions/Next Steps (if any)** |
| 1. Does the center have a SOP for providing reasonable accommodation? |  |  | If no, please visit the Job Corps Disability website to download a sample SOP. The document can be updated to reflect your center’s procedures. |  |
| 1. If the center does have a SOP for reasonable accommodation, is the process described in the SOP currently reflected in center practice? |  |  | SOP should be reviewed annually and updated when necessary. Suggest adding Disability Program updates as an agenda item on management meeting agenda. |  |
| 1. Are applicants/students made aware that they are entitled to reasonable accommodation? |  |  | There are several suggested times that this information should be provided:   * During orientation visits to center * Whenever an applicant/student discloses that he or she has a disability * During student orientation * Within informational literature about the Job Corps Disability Program and/or reasonable accommodation that is available throughout the center and included in the student handbook |  |
| 1. Is staff aware that the Job Corps is required to make reasonable modifications to policies, practices, and procedures when necessary to enable people with disabilities to participate in the program? |  |  | Contact your regional disability coordinator (RDIC) and discuss training options and materials that may be available to assist you in educating staff about requirements for providing reasonable accommodation and modification to policies, practices, and procedures, as appropriate. |  |
| 1. Has the reasonable accommodation process been incorporated into the center’s CDSS plan? |  |  | Upon enrollment all students should be advised about the rights of a person with a disability to request reasonable accommodation. Provide students with a brochure about reasonable accommodation upon enrollment. Include similar information in the student handbook. A brochure for students about reasonable accommodation is available on the Job Corps Disability website. |  |
| 1. Does staff know how to proceed if an accommodation is requested or they suspect a student may have a disability? |  |  | Staff should be trained on the center’s reasonable accommodation process (as per the center’s SOP). This training should include what to do if a staff suspects that a student has a disability. The center should have a formal referral process in place that includes the use of a form to document the process. |  |
| 1. Does the center store records containing disability-related information properly to ensure confidentiality is maintained? |  |  | Store the disability information in separate file cabinet/drawer that may be locked. Access to this information is determined by the DC and available to those with a “need to know.” Health information remains in the student health record and determination of those with a “need to know” is determined by the HWM. |  |
| 1. Are folders for students with disabilities being processed in the same amount of time as students without a disability?   If not, are any delays documented and reasonable? |  |  | Establish weekly file review team meetings so decisions can be made in a timely manner, if possible. Keep open communication with the admissions counselors to secure any needed documentation or the center should secure the information if it is more expeditious to do so. Ensure the DCs contact applicants to determine accommodation needs or schedule a reasonable accommodation committee (RAC) meeting for any applicants who need one. |  |
| Recreation | | | | |
| **Review Item** | **Yes** | **No** | **Possible Solutions** | **Actions/Next Steps (if any)** |
| 1. Are students with disabilities encouraged to take part in all recreational trips and programs? |  |  | Ensure the provision of accessible recreational opportunities for students with disabilities. Check with local Centers for Independent Living, local Community Service Boards, and other local disability resources for ideas and suggestions about making recreational opportunities accessible to all. Contact your RDIC for guidance. |  |
| 1. Are all team tryouts and intramural activities advertised to the entire student body? |  |  | Provide center recreational materials in alternative formats for students who may need them. If a student has dyslexia and is unable to read text, provide audio versions of schedules or have them announced orally. |  |
| 1. Are rules/requirements of games/activities adapted when possible to allow a student with a disability to participate? |  |  | See “possible solutions” response to Item #1 under Recreation |  |
| 1. Is a student with a disability who has expressed interest in a sport but cannot participate because of his/her disability encouraged to participate in other roles within the sport (e.g., team manager, assistant to coach)? |  |  | Ask the student if they have played the sport before and how they were able to participate. Ensure that there is not an assumption that someone cannot participate because of perceptions of their disability. See “possible solutions” response to Item #1 under Recreation. |  |
| 1. Is the recreation manager aware of the student’s recreation interests and appropriate accommodations that would allow the student to participate? |  |  | Ensure that the RAC (inclusive of the student) has considered access options to the recreational programs offered by the center. |  |
| 1. Is recreation staff aware of community resources (e.g., local Special Olympics) that may be able to assist in involving students with disabilities in recreational activities? |  |  | Students with disabilities may or may not wish to participate in segregated or fully integrated sports. Ensure that the recreation manager and the DC have discussed the student’s preferences and provided available options to him or her. Provide information on disability resources and partnerships that have been developed in the community. |  |
| 1. Are off-center recreational activities held in accessible locations whenever possible? |  |  | Check with the local Centers for Independent Living, the YMCA, or other disability organizations to gather information about the types of accessible recreational activities available in the center’s community. |  |
| 1. Does the recreation staff consider sport/games that pair students with disabilities with students without disabilities? |  |  | Provide awareness training and disability resources to recreation managers to assist them in making the center’s recreation programs as accessible and inclusive as possible. |  |
| Transportation | | | | |
| **Review Item** | **Yes** | **No** | **Possible Solutions** | **Actions/Next Steps (if any)** |
| 1. Is transportation for students with disabilities as effective as transportation provided to students without disabilities? |  |  | Review plan for addressing transportation needs and update the information to ensure students with disabilities are included |  |
| 1. If accessible center and public transportation is not available (e.g., center is in a rural area), can special accommodations be made for a student with a disability (e.g., volunteer or paid drivers from civic organizations)? |  |  | Talk with local transportation agencies and organizations to discuss possible avenues for accessible transportation for students with disabilities |  |
| Residential | | | | |
| **Review Item** | **Yes** | **No** | **Possible Solutions** | **Actions/Next Steps (if any)** |
| 1. Are accessible dormitory rooms offered to students with disabilities on a preferential basis, as needed and as appropriate? |  |  | Students with vision or mobility impairments are provided first floor rooms near exits. Students with hearing impairments are placed in rooms where visual strobes are located or near the residential advisor’s office, etc. |  |
| 1. Is there an accessible shower/bath and bathroom available for individuals who may use a wheelchair or have other types of mobility impairments? |  |  | Identify accessible showers/bathrooms on center and mark with appropriate signage. Ensure they are within accessible and reasonable proximity to the individual who needs to use them. Include physical access improvement projects in VST plans and other center construction/improvement plans. |  |
| 1. Is there an accessible vending machine available to individuals who may use a wheelchair or have other types of mobility impairments? |  |  | Contact the vendor to inquire about the availability of accessible vending machines for use by individuals with mobility and vision impairments. |  |
| 1. Are there accessible locker’s available to individuals who may use a wheelchair or have other types of mobility or visual impairments? |  |  | Purchase or acquire lockers that are at an appropriate height for a person with a wheelchair to use. For individuals with vision impairments, provide a locker with an accessible lock such as one with push buttons. |  |
| 1. Are dorm schedules, assignments, and other information notices accessible to students with print disabilities? |  |  | Provide alternate format versions of the information that needs to be disseminated such as large print or audio tape. Another option is to provide access to a computer with scan and read type software (i.e., scan a document into the computer and have it read out loud to the individual). |  |
| 1. Are emergency procedures for the dorms reviewed and adapted if necessary when a student with a disability arrives on center? |  |  | * Involve the safety officer to ensure emergency procedures are part of the accommodation plan when necessary * Ask the local rescue department to review the center’s emergency plan |  |
| Cafeteria/Food Services | | | | |
| **Review Item** | **Yes** | **No** | **Possible Solutions** | **Actions/Next Steps (if any)** |
| 1. Are the food service lines, salad bar, drink machines, etc., accessible to individuals with various types of disabilities? |  |  | Assign a couple of peer buddies to assist the individual with getting his/her tray and food items. Ideally, consider options that will allow the individual to access the line independently whenever possible. If an individual needs more time to make it through the lines, etc., allow him/her to leave class a few minutes early to access the lunchroom area first. |  |
| 1. Is the menu accessible to individuals with visual impairments or print disabilities (e.g., large print, tape recorded), if needed? |  |  | Have student government or culinary students re-create menus. This will not only lessen the work load for staff and is economical, but will also begin the process of creating an inclusive environment through recognition and appreciation of differences. |  |
| 1. Are there spaces for wheelchair seating? |  |  | Equip the cafeteria with some tables that are accessible to individuals using a wheelchair |  |
| 1. Are some aisles between tables accessible? |  |  | Ensure that there is adequate room for a person with a mobility impairment to move through the lines and dining areas of the cafeteria. |  |
| Safety | | | | |
| **Review Item** | **Yes** | **No** | **Possible Solutions** | **Actions/Next Steps (if any)** |
| Does the center safety plan contain general provisions that consider the needs of people with disabilities? |  |  | Contact your local Center for Independent Living (if one is nearby), and/or your local vocational rehabilitation (VR) office to seek their advice or guidance in the types of considerations for people with disabilities that should be addressed in the center’s safety plan. |  |
| 1. Does the safety officer participate in the RAC meetings when a student may need safety-related accommodations? |  |  | DC invites the safety officer to participate in the RAC meetings when there is a student with a disability for whom there needs to be safety considerations/plans (i.e., individual who is in a wheelchair, has visual or hearing impairments, has major sensory issues, etc.). This also might include special considerations for an individual on certain types of psychotropic medication that causes deep sleep and who might not readily hear emergency evacuation alarms. |  |
| 1. Does the center have an emergency evacuation plan that includes necessary considerations and supports for the evacuation of students with varying types of disabilities, particularly in the residential area of the center and/or on second floor or higher building locations? |  |  | Have the local fire and rescue department review your plan and make suggestions for improvement, as appropriate. Supply local fire and rescue personnel with a list of students who may need additional assistance in the event of an evacuation. Include their room locations and update the list as required. |  |
| 1. Are emergency procedures reviewed and adapted when a student with a disability arrives on center with needs that are not included in the center’s current emergency procedures? |  |  | The DC invites the safety officer to attend the student’s RAC meeting to discuss any needs related to safety. The safety officer makes changes to the center’s emergency procedures, if necessary, and ensures all managers are informed of the updated information.  Each time a student who may need additional assistance evacuating enrolls or separates from the program, provide local fire and rescue with an updated list of students. |  |
| 1. Does the center have a buddy program that provides assistance to students in the event of an emergency and in everyday situations on center? |  |  | Identify a team of students who are interested in participating as peer buddies. Provide training and ongoing supervision.  ***NOTE:*** *The use of peer buddies does not replace the center staff’s responsibility to ensure that the individual with a disability has his/her accommodations provided, has access to center programs and information, and that staff are adequately informed and trained about the safety considerations for each particular individual.* |  |
| Communication | | | | |
| **Review Item** | **Yes** | **No** | **Possible Solutions** | **Actions/Next Steps (if any)** |
| 1. Does the center have accessible communication options available? Note: ADA requires that individuals with disabilities have access to effective communication. Effective communication means that whatever is written or spoken must be as clear and understandable to people with disabilities as it is for people who do not have disabilities. This is important because some people have disabilities that affect how they communicate. |  |  | Here are some examples of different auxiliary aids and services that may be used to provide effective communication for people with disabilities. But, remember, not all ways work for all people with disabilities or even for people with one type of disability. You must consult with the individual to determine what is effective for him or her.   * qualified interpreters * note takers * screen readers * computer-aided real-time transcription (CART) * written materials * telephone handset amplifiers * assistive listening systems * hearing aid-compatible telephones * computer terminals * speech synthesizers * communication boards * text telephones (TTYs) or relay services * open or closed captioning/closed caption decoders * video interpreting services/videotext displays * description of visually presented materials * exchange of written notes * email * text messaging/instant messaging * qualified readers * assistance filling out forms * audio recordings * Brailed materials * large print materials * materials in electronic format |  |
| 1. Does your center have any staff person trained in the use of the state relay system for people who are deaf or hard of hearing and/or Speech to Speech, the relay system for people with speech disabilities? |  |  | Contact your local Easter Seals or VR to find a community resource that may offer this training |  |
| 1. Is staff aware of the relay number? |  |  | The center director’s assistant will look into more information and training on using relay service |  |
| 1. Does your center maintain a list of sign language interpreters with whom to contract services if needed? |  |  | Identify local organizations that can support interpreter acquisition when necessary. Maintain a list for future reference. |  |
| 1. Are your center’s most used written documents (e.g., newsletters, student handbook, schedules, brochures, applications, etc.) in alternate formats if needed (large print, videos, audiotapes, electronic text files)? |  |  | Create center information materials in a word processing program, such as MS Word, in a format without columns, tables or other "complex" formatting. Involve student government members and/or career technical trades in the ongoing development of such materials. |  |
| Academics & Career Technical | | | | |
| **Review Item** | **Yes** | **No** | **Possible Solutions** | **Actions/Next Steps (if any)** |
| 1. Are your classrooms and training areas accessible to students with a variety of types of disabilities? |  |  | Equip the training environment with:   * Adjustable workstations * Adequate aisle space * Assistive technology * Adaptive equipment for driver’s education |  |
| 1. Do you have access to accessible curriculum documents and materials (e.g., alternate formats such as Braille, large print, audio/video recordings), as needed? |  |  | Consider adding the following assistive technology:   * Scan and read type software (i.e., can print materials be scanned in and be read back out loud to individuals with print and visual impairments?) * Digital tape recorders |  |
| 1. Is the equipment in the career technical areas of the center accessible to individuals with disabilities? |  |  | Provide such items as talking tape measures, thermometers, one-handed keyboards, etc. for individuals with hearing impairments or other types of cognitive or learning disabilities if the accommodation plan indicates the need to provide. Contact your local VR office and/or the Job Accommodation Network (JAN) for guidance and advice in identifying accessible devices. |  |
| 1. Do you offer a variety of learning situations (e.g.,. size, teaching and learning style, location, individualized, working as a team, interpersonal skills)? |  |  | * Consider all learning situations and provide opportunities for students to become familiar with their learning strengths. * Administer a learning style inventory assessment such as the VARK. |  |
| Work-based Learning/Career Transition | | | | |
| **Review Item** | **Yes** | **No** | **Possible Solutions** | **Actions/Next Steps (if any)** |
| 1. Is career transition staff (CTS) invited to participate in the RAC meeting for a student preparing to enter work-based learning? |  |  | DC invites the CTS to participate in the RAC meeting of students getting ready to enter work-based learning. Some centers include the CTS as a permanent member of the RAC. |  |
| 1. Has the student been provided information about the do’s and don’ts of disclosure of his/her disability? |  |  | Students should be provided information about the do’s and don’ts of disclosing their disability. Center staff cannot make this determination for them. There is a newsletter and other resources dedicated to this topic on the Job Corps Disability website. |  |
| 1. Does the student need reasonable accommodation to participate in work-based learning? |  |  | Conduct a RAC meeting (inclusive of the CTS and the student) prior to a student with a disability entering work-based learning. Review the existing accommodation plan and possibly create a transition plan to ensure the student understands the essential functions of the job he or she is undertaking. The student must determine if they need to request reasonable accommodation. The DC and the CTS can assist the student in the process but the decision is the student’s to make. |  |
| 1. Are you ensuring work place compliance with federally mandated protections (e.g., Americans with Disabilities Act)? |  |  | Provide staff training on ADA law and regulations and provide information about staff responsibilities regarding the law. |  |
| 1. Is the DC, CTS, or other designated staff working with each student with a disability to teach the concepts of self-determination and self-advocacy? |  |  | Visit the Job Corps Disability website to obtain information collected on self-advocacy and determination. Meet with student to offer counseling and information on these topics. |  |
| Business & Community Relationships | | | | |
| **Review Item** | **Yes** | **No** | **Possible Solutions** | **Actions/Next Steps (if any)** |
| 1. Are representatives from disability-related organizations included on the center’s community relations council? |  |  | The center’s business community liaison contacts representatives of local disability-related organizations and asks them to participate on the center’s community relations council. |  |
| 1. Are representatives from disability-related organizations included on the center’s industrial councils? |  |  | The center’s business community liaison contacts representatives of local disability-related organizations and disability-friendly employers and asks them to participate on the center’s industry relations council. |  |
| 1. Does your center educate employers on the positive aspects of hiring individuals with disabilities including the dispelling of misperceptions and informing them about tax incentives/credits? |  |  | * Offer Job Corps tours and information sessions to employers and community organizations. * Sponsor job fairs showcasing students completing tasks using a variety of assistive technology and/or other adaptations. * Use statistical data to dispel the myths about hiring individuals with disabilities. Statistical data and links to source reports can be found in the Disability Sensitivity presentation located on the Job Corps Disability website in the Trainings and Webinars/Awareness/Etiquette section. * Include the student government association in community outreach and service projects development. |  |
| Technology | | | | |
| **Review Item** | **Yes** | **No** | **Possible Solutions** | **Actions/Next Steps (if any)** |
| 1. Do staff and volunteers know how to activate, adjust and provide instruction on the accessibility features of their computer's operating systems? |  |  | Every computer has an operating system, the most common being Windows and Macintosh. Each of these systems has some built-in accessibility features that allow the user to adjust the keyboard, bypass the mouse, change the cursor, magnify what appears on the screen and read text aloud. Information about the accessibility features of the Windows operating system can be found at: <http://www.microsoft.com/enable/>.  Macintosh OS accessibility information can be found at: <http://www.apple.com/accessibility>. |  |
| 1. Does at least one workstation, but preferably more, have assistive technology software programs that allow people who have vision, hearing, dexterity, learning, or reading-related limitations to perform basic functions on a computer such as word processing, e-mail, and web "surfing"? |  |  | Acquire and install   * optical character recognition program with voice output for individuals with print and visual impairments * screen enlargement program for individuals with limited vision * voice recognition software for individuals with limited use of their hands, a motor-based disability, and/or a learning disability such as dysgraphia |  |
| 1. Do staff and volunteers know where to find information and resources about assistive technology hardware and software? |  |  | Develop and maintain a resource list that includes contact information for assistive technology resources for people with disabilities, such as:   * Association of Assistive Technology Act Program (ATAP)   <http://www.ataporg.org>   * Alliance for Technology Access (ATA)   <http://www.ataccess.org> |  |
| Public Access | | | | |
| **Review Item** | **Yes** | **No** | **Possible Solutions** | **Actions/Next Steps (if any)** |
| 1. All public events sponsored by your center, such as public meetings, fundraising events, workshops are held in an accessible location? |  |  | Ensure that graduation ceremonies, all student assemblies, etc., are held in locations where there is an accessible ramp for individuals with disabilities, appropriate seating access, and varied communication options available, as needed and appropriate. For example, individuals who are deaf or hard of hearing may require the use of interpreters or assistive listening devices to be able to benefit or participate in center assemblies. |  |