

ADA TRANSITION PLAN

Name of person completing this form: Tina B. Snyder
Title: Director of Administrative Services **Date:** January 20, 1993
Name and Address of Facility: KIPDA
11520 Commonwealth Drive
Louisville, KY 40299

Necessary structural changes (list feature(s) and how each is inaccessible.

1. The entrance is accessible, however the doors require 12-14 pounds of pressure to open.
2. The doors to the restrooms are heavy.
3. The restrooms have no tactile/braille signage on the doors.

Type of action to be taken.

1. and 2. The doors to both the front entrance and the restrooms will be adjusted to only require 8.5 pounds of pressure to open and the restroom doors will be adjusted to only require 5 pounds of pressure to open.
3. Signage will be procured and placed on the restroom doors.

Plan for temporary action to provide immediate overall accessibility.

Until the pressure on the doors are manipulated, the receptionist, as always, will help with the front entrance, and find someone to assist anyone else, as needed.

Person responsible for overseeing action.

Tina B. Snyder

Projected date to initiate action.

January 20, 1993

Projected date to complete action.

February 28, 1993

Projected cost to complete project.

\$50.00

SELF-EVALUATION

Self-Evaluation Checklist

Person Completing This Form: Tina B. Snyder

Department: Administration

Program, Activity or Service: Kentuckiana Regional Planning and Development Agency (KIPDA)

A. Participation of Persons with Disabilities

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

The Center for Accessibility Living has been contacted and will let us know, as soon as a fee schedule is established, when they are able to visit our agency to review and comment on our self-evaluation and transition plan.

B. Nature of Program

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

Organized in 1973, the Kentuckiana Regional Planning and Development Agency (KIPDA) is an association of local governments in a nine-county region of southern Indiana and north central Kentucky. The KIPDA region is comprised of Bullitt, Henry, Jefferson, Oldham, Shelby, Spencer and Trimble Counties, Kentucky and Clark and Floyd Counties, Indiana. The Metropolitan Statistical Area (MSA) is comprised of the counties of Clark, Floyd, and Harrison in Indiana and Bullitt, Jefferson, Oldham and Shelby in Kentucky.

KIPDA provides regional planning, review and technical services in the areas of public administration, social services and transportation. KIPDA is designated by the Kentucky State Clearinghouse as the regional review agency for virtually all applications for federal and/or state funds made by organizations or governments within the region. It also provides direct services to social service recipients. The service recipients receive case management and assessments services in their home or other residential settings. The program is designed to avoid or delay institutionalization of at-risk older adults. Every client is under active case management by a professional social worker or nurse who develops, in consultation with the client or significant persons in the clients' life, a care plan for the client, using both community resources and those contracted through this program.

KIPDA's governing board consists of the chief elected executives from the nine counties it serves, as well as representatives of nine member municipalities, an at-large minority representative and appointees from the six rural Kentucky counties.

C. Recruitment and Advertisement

Does the agency engage in any of the following activities to recruit program participants or otherwise inform persons of the program's existence? If no, proceed to Item D.

Describe briefly activities involved and materials used.

Meetings or Oral Presentations	List steps to ensure accessibility and opportunities for full participation by persons with disabilities.	Describe approaches to ensure effective communications with persons with vision and hearing impairments (e.g. provision of auxiliary aids or presentation of materials in alternative formats).	List steps to ensure inclusion of a notice of the public entity's compliance with the ADA in all materials and advertisements.
Printed Recruitment Materials	KIPDA sponsored meetings are only to be held in handicapped accessible locations.	A list of qualified communicators will be kept in the event assistance is requested.	The TDD# will be included on all stationary and meetings notices. A statement pertaining to available accommodations will also be included on all newsletters and meeting notices.
Advertisements	The TDD# and Equal Opportunity Employer disclaimer is included on all recruitment materials. The application site and all work sites are accessible.	Accommodations will be made for staff to read, tape or help complete application materials, forms, etc. and/or to secure a reasonable auxiliary aid to complete or review any recruitment material.	See above
Other (Specify)	The statement "Equal Opportunity Employer" is included on all stationary and meetings notices. The newsletter and meetings notice also include a statement regarding available accommodations.	See above	See above

D. Program Eligibility Requirements and Admission

1. Are there any limitations on the number of qualified persons with disabilities who may participate in or be admitted to the program?

XXX No ___ Yes

If no, proceed to "2" below.

If yes, list steps to be taken to eliminate the limitation(s).

--N/A--

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

___ No XXX Yes

If no, proceed to "7" below.

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

To qualify to participate in the Social Services HomeCare Program, the potential client must be deficient in one or more of the Activities of Daily Living. The most serious health or situational cases will be addressed first.

3. List all criteria and tests from "2" above that have (or could have) a disproportionate, adverse impact on program applicants with disabilities. Discuss briefly the (potential) negative impact for each.

None.

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

None.

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

None.

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

None.

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

No Yes

If no, proceed to "8" below.

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

An assessor/case manager visits each HomeCare referral to do an initial assessment of the client's physical and mental condition. The assessment also includes a review of the home environment. When a client is referred, if a disability has been indicated or there is a question of one existing, the assessor requests the care provider be present to deal with any potential communication problems. Several current clients communicate by writing notes. One client communicates by blinking her eyes. If auxiliary aids are needed the assessor/case manager will make a referral to the agency best suited to handle the request.

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

No Yes

If no, proceed to "11" below.

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

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

N/A

10. Do the forms listed in "8" above contain a notice of your organization's compliance with the ADA?

No Yes

If yes, proceed to "11" below.

If no, list steps to ensure the inclusion of notices of your compliance with the ADA in all materials.

The HomeCare Program caters to persons with various disabilities.

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

Potential clients must be asked about the extent of their disabilities to be able to provide the best possible care.

E. Participation in the Program

1. Are post-admission inquiries made regarding the status of individuals with disabilities in making a reasonable accommodation?

No Yes

If no, proceed to "2" below.

If yes, list steps to ensure that information is gathered voluntarily; not used to affect any person with a disability adversely; and kept confidential.

The case manager needs to be aware of all disabilities to offer the best care for an individual in their home.

2. Is there an orientation for new participants?

No Yes

If no, proceed to "3" below.

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

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

A quality assurance form is sent to the program participant along with a care plan which includes the client's service summary and case manager's name. The form includes the TDD# and KIPDA's#. The case manager is aware of the physical condition of the client and will adapt whatever materials necessary in a way the client can understand them. If a client would request information be on tape or in braille, it would be so provided.

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

The case manager is aware of the physical condition of the client and will adapt whatever materials necessary in a way the client can understand them.

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

No, not that we anticipate at this time. Yes

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

6. What elements or activities are included in the program?

Activities included in the program are home visits, consultation with clients, consultation with care providers, ordering of available services to help the client avoid institutionalization, and

phone contact.

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

Phone contact may pose a problem for persons unable to communicate by conventional phone systems. In this event the case manager may contact the care provider or conduct a home visit.

8. **Are any of the following services or benefits provided to program participants? (If none is provided, proceed to "9".)**

Transportation Services Counseling Services Employment Services
 Health Services and Insurance/Benefits Food Services
 Housing Financial Aid
 Social, Recreational or Athletic Activities

List steps to ensure that:

- * **Service/benefit is equally effective for and usable by persons with disabilities;**
- * **Administration of service/benefit will be free from discrimination based on disability;**
- * **Communications will reach all persons (including those with hearing and sight impairments); and**
- * **Effective application procedures to receive the services exist for persons with disabilities (including those with hearing and vision impairments)**

Counseling services provided through the HomeCare Case Managers is provided in the home. If a communication problem exists, the care provider will be asked to be the communicator, or if a situation exists that the care provider is suspect for possible abuse, etc., then the case manager will arrange whatever assistance or accommodation necessary.

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

All information is effectively communicated to persons in the program at this stage. Current ways are reading the information to a client and having the client's major care giver present.

10. **Are there boards, councils or similar organizations on which program participants sit?**

No Yes

If no, proceed to "11" below.

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

Persons are selected by their participation level and knowledge level of items effecting their plights as Senior Citizens. The Advisory Council meets at KIPDA which is accessible.

11. **Are these facilities accessible to people with disabilities, including people who use wheelchairs? If no, is the program, "when viewed in its entirety," accessible?**

No Yes

If no, what steps will be taken to make it accessible?

F. Staff Information

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

All persons involved in the delivery of HomeCare Assessment and Case Management cater to persons who need some form of assistance by the nature of the program. The hiring of Agency staff is coordinated by the Director of Personnel, who also serves as the ADA Coordinator for the Agency.

G. "Outside" Persons and Organizations

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

KIPDA contracts with 26 agencies to provide the services to maintain clients in their homes. In the contract each agency must sign, there is a clause relating to Discrimination because of handicapped prohibited citing Section 504 of the Rehabilitation Act and ADA.

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

In all contracts awarded by KIPDA the standard discrimination clauses are included, including ADA. A training was held at KIPDA in the Spring of '92 for all local government entities and social service subcontractors on ADA compliance.

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

--N/A--

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

The services "in their entirety" are handicapped accessible and there is the non-discrimination clause in their contract.

H. Facilities Used

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

- 1. List below all facilities, or portions of facilities, used for the activities covered in section "C" through "G" above, designating for each the activity for which it is used (NOTE: Facilities leased or otherwise used from another person or organization should be included).**

KIPDA Offices - 11520 Commonwealth Drive, Louisville, Kentucky 40299

- 2. Using the accessibility checklist, list below for each facility (or portion of) inaccessible features that limit program accessibility.**

The KIPDA Offices are accessible.

- 3. List steps to ensure that all future construction and renovation work (after January 26, 1992) will comply with the architectural standards as listed in "2" above.**

Since KIPDA receives federal and state funds all future construction and renovation must comply with USAF architectural standards.

- 4. List steps to ensure periodic communications with program participants with disabilities as well as with potential participants with disabilities concerning accessible and inaccessible facilities.**

Case managers must contact their clients monthly to ensure their well-being and proper receipt of services. At this time additional information may be given.

- 5. Using information from "1" above:**

List non-structural measures that will be taken to ensure accessibility when the program is "viewed in its entirety," including:

- a. relocating the activity to accessible space;**
- b. being able to relocate the activity to accessible space, upon notice of the needs of a qualified person with a disability;**
- c. revising the structure or format of the activity so the space is not needed;**
- d. modifying or redesigning equipment;**
- e. making home visits or other alternative delivery services; or**
- f. otherwise achieving program accessibility.**

(If non structural changes cannot achieve program accessibility, place the feature on your transition plan for necessary structural changes.)

The office listed in "1" is accessible.

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

XXX No ___ Yes

If yes, list steps to ensure program accessibility, including any structural changes. If structural changes would compromise the historic value, list alternative methods to ensure program accessibility (NOTE: if the program held at a historic facility is not a "historic preservation" program, it must be relocated if structural accessibility is not possible).

EMPLOYMENT ASSESSMENT TOOL

The following guidelines have been prepared to assist public entities in their compliance with the employment provisions of the ADA and/or section 504 of the Rehabilitation Act of 1973 as amended. They may be used during the initial self-evaluation process and ongoing future efforts to ensure non-discrimination on employment on the basis of disability.

The "Employment Assessment Tool" is based on requirements contained in both the ADA Title I requirements and the government-wide regulations issued under section 504.

Date: July 24, 1992

Person Completing This Form:

Tina B. Snyder
(name)

Director of Administrative Services
(title)

11520 Commonwealth Drive, Louisville, Kentucky 40299
(address)

(502) 266-6084
(telephone)

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1. **Discuss safeguards used to ensure that all employment decisions are made without discrimination on the basis of disability, and that such decisions do no limit, segregate or classify applicants or employees based on disability in a way that adversely affects their opportunities or status.**

All employment decisions are coordinated by the Personnel Director who is also the ADA Coordinator. If a question regarding a potential discrimination issue arises, before any discussion or action is done, the agency's legal counsel is consulted to avoid any non-intentional discrimination.

2. **Describe procedures to ensure that formal relationships regarding employment (e.g. those with labor unions, employment agencies, etc.) do not have the effect of discriminating against qualified persons with disabilities.**

The agency has no formal relationships with regards to employment.

3. Analyze the following aspects of employment to make certain that the agency does not discriminate against persons with disabilities (including discrimination which occurs due to an inaccessible facility):

*** Recruiting, advertising and processing applications for employment;**

All recruiting is done, at a minimum, through our list of affirmative action agencies which include rehabilitation and disability agencies. The statement Equal Opportunity Employer is included on all job postings and advertisements. If an accommodation is needed to complete an application, it will be provided within a reasonable requested time frame. The KIPDA Office is the only location that applications are available and interviews are conducted.

*** Hiring, upgrading, promotion, award of tenure, demotion, transfer, layoff, termination, right of return from layoff, and rehiring;**

As an Affirmative Action Agency we are prohibited to discriminate in any of the above areas. ADA goes hand in hand with activities already established.

*** Rates of pay or any other form of compensation and changes in compensation;**

See above

*** Job assignments, job classification, organizational structures, position descriptions, lines of progression, and seniority lists;**

See above

*** Leaves of absence, sick leave or any other leave;**

See above

*** Fringe benefits available by virtue of employment, whether or not administered by the recipient;**

See above

*** Selection and financial support for training, including apprenticeship, professional meetings, conferences and other related activities and selection for leaves of absence to pursue training;**

KIPDA has not in the past paid for any training. Leaves of absences have not been granted for pursuing training. Conferences are attended by the most likely person due to their related workload.

*** Employer-sponsored activities, including social and recreational programs; and**

All employer-sponsored activities will be held in accessible locations if held away from the office.

*** Any other term, condition or privilege of employment.**

As an Affirmative Action Agency, we are prohibited, and are especially aware of any potential areas of discrimination. Through consultation with the agency's attorney and on-going training of the Director of Personnel, we hope to continue to make pro-active efforts to guard against any discrimination.

- 4. Discuss in general terms the concept of "reasonable accommodation" as it applies to your employees and applicants for employment. Give some examples of accommodations (including facility renovation work as appropriate) that will be made for the known physical and mental limitations of otherwise qualified persons with disabilities.**

Reasonable accommodations for example could be if a sight or hearing impaired person was hired KIPDA could change or adapt the employee's phone for lights for the ringer, flashing lights to correspond with the fire alarm system, and/or an employee buddy in the event of any catastrophe. The buddy system could also be expanded to cover every employee. Other types of reasonable accommodation could be new computer programs and/or keyboard and/or monitor enhancers. Example: KIPDA has purchased a hearing enhanced ear set for a phone. The handset can be set on regular or can be turned up several volumes.

- 5. What employment tests or criteria are used for judging potential employees? Describe procedures to ensure that these criteria or tests do not discriminate against persons with disabilities.**

All applicants for each position are asked questions from the same list of questions pertinent to the work area. All questions may not be asked due to individual responses. When references are checked, only job performance related questions are asked. The same knowledge and experience is required of all final applicants. The Director of Personnel coordinates the hiring process and also serves as the ADA Coordinator.

The only job related test currently used is for a typing test given to all applicants being interviewed for the secretary and receptionist positions. A certain number of words per minute must be attained before the applicant will be considered for a second interview. The test will be reviewed for any potential areas of discrimination. The applicant is aware of the test at the time the interview is set up.

- 6. Describe methods used to identify the job-related characteristics of tests and criteria used in employment decisions, since job-related tests are permitted even if they screen out persons with disabilities.**

See above

- 7. Does your organization conduct or require any medical exams prior to making offers of employment?**

XXX No ___ Yes

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

8. **Review job application forms and interview questions to ensure that applicants are not asked about the existence of (or nature or severity of) a disability. (Inquiries related to one's ability to perform a job effectively and safely are permitted.)**

Ensure that the applicants are not asked about their relationship or association with an individual with a disability.

The job application forms have been revised recently and reviewed by legal counsel to delete any question relating to any disability. A question should not be posed addressing an applicants relationship with a disabled person, that is an invasion of privacy.

9. **Review existing job description forms for each job position in your organization for use in determining "qualified" applicants, and determine the essential and marginal functions of job positions in your organization.**

That is currently being done, and will be done on an on-going basis.

COMMUNICATIONS ACCESSIBILITY CHECKLIST

Under Title II of the ADA, agencies must provide communication accessibility to people with hearing, visual and speech impairments. This form, which should be used in conjunction with the general self-evaluation, highlights the requirements of the Title II rule. It is also intended to help agencies identify areas to be made accessible and outline steps to comply with the ADA.

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

See attached

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

Auxiliary aids will be provided if given an appropriate amount of time to arrange.

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3. **Text Telephone Services - Does the agency provide services or information to the general public over the telephone?**

XXX No ___ Yes

If yes, is a text telephone (TT) or other equally effective system available so that agencies can communicate with individuals with a speech and/or hearing impairment?

If no, list steps to ensure effective communication with individuals with a speech and/or hearing impairment. This can include providing a TT or relying on a third-party relay service. NOTE: The Justice Department encourages agencies that have extensive phone contact with the public to have TTs to assure more immediate access.

We are listing and utilizing the Kentucky Relay Services.

4. **"911" Emergency Services - Are all "911" emergency response services equipped with a text telephone (TT) or other equally effective technology to make the service accessible to individuals with a speech and/or hearing impairment? NOTE: Separate, seven-digit phone numbers and/or reliance on a third-party relay services is not an acceptable alternative for making 911 services accessible.**

--N/A--

5. **Information and Signage - Is information provided concerning the following?**

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

All entrances are handicapped accessible.

*** Signage concerning the availability and location of TT-equipped pay phones or portable TTs.**

XXX No ___ Yes