



SECTION 504 SELF – EVALUATION INFORMATION 24 CFR PART 8

INTRODUCTION

The following is a checklist of general requirements that recipients should consider in their self-evaluation efforts under Section 504 of the Rehabilitation Act of 1973, as amended. It should be used in conjunction with the United States Department of Housing and Urban Development (HUD)'s regulations at 24 CFR Part 8.

This checklist is designed to serve as a working guidance tool to help recipients focus on key issues that could affect the accessibility of their programs and practices. In developing answers to the questions, a recipient will be preparing most of the information that Section 504 requires. Use of the checklist should also assist a recipient in pinpointing areas where action is likely to be required to achieve compliance with Section 504. It should be emphasized, however, that this checklist is for reference purposes, and is not intended as a substitute for individual judgment or analysis of the pertinent regulations issued pursuant to Section 504. Any information in this checklist cannot be used as a sole basis for determining compliance with Section 504.

The government wide regulations do not prescribe a specific form. This self-evaluation was compiled from material by the Thompson Publishing Group *Section 504 Compliance Handbook*, the Department of Justice Civil Rights Division Technical Assistance Guide (TAG), report on *Section 504 Self-Evaluation* of U.S Department of Housing and Urban Development conducted programs and activities, and other HUD Region IV state checklists.

REQUIREMENTS:

CDBG-I Grant Contract:

Per the CDBG-I Grant Contract, recipients must comply with the provision of Section 504 of the Rehabilitation Act of 1973, as amended, and HUD implementing regulations at 24 C.F.R., Parts 8 and 9. Recipients must complete the Section 504 Survey and adopt a Grievance Procedure, as well as complete a Transition Plan, if applicable.

The Grant contract requires recipients to complete the Section 504 Survey and Transition Plan (if applicable), covering policies, practices, and physical accessibility and notify affected persons that it does not discriminate on the basis of the handicap. Compliance with the plan must be documented, including the information made public and the means used to make it public.

24 CFR 8.51:

- (a) Each recipient shall, within one year of July 11, 1988, and after consultation with interested persons, including individuals with handicaps or organizations representing individuals with handicaps:
 - (1) Evaluate its current policies and practices to determine whether, in whole or in part, they do not or may not meet the requirements of this part;
 - (2) Modify any policies and practices that do not meet the requirements of this part; and



TECHNICAL ASSISTANCE

There is no prior approval of the completed survey by Compliance Specialist. Should the local government need technical assistance it is recommended to email Colleen Simmons at colleen.simmons@ncdenr.gov or 704-235-2202 with questions or contact your Grant Representative.



2. How does your agency incorporate provisions to ensure equal opportunity for individuals with disabilities into its policy and program initiatives?

(e.g., Guidelines highlight equal opportunity for persons with disabilities under important information, review criteria, and/or Equal Opportunity issues are discussed with policy and/or service groups; Office undertakes specific effort to enhance equal opportunity for people with disabilities, by: Equal Opportunity for people with disabilities is a consideration when the office conducts special initiatives such as research, studies, symposia and/or future planning efforts.)

Yes No (explain below) N/A (explain below)

Periodic Public Service Announcements (radio, etc.), posters, newspapers ads, public notices, Section 504 Self-Evaluation, ADA Grievance Procedure adopted; Town Website: Equal Opportunity is made part of advertisements for CDBG-I contracts awarded, employment, and services

3. Does your agency provide opportunities when developing or amending its policies for qualified people with disabilities to participate as? Check applicable responses and explain efforts.

- Staff - Specify efforts: Employment ads are disability friendly - referencing Town's involvement with Section 504 requirements
- Consultants/Panelists - Specify efforts: Ads are disability friendly - referencing Town's involvement with Section 504 requirements
- Other - Specify efforts: Administrative and Public Works facilities, Town Parks & Recreation facilities, along with other public facilities, generally, are ADA friendly

4. How does your agency support any needed accommodations for visitors, staff, or other meeting participants who may have disabilities? (e.g., certified sign language or oral interpreter, a reader or taping printed material). Check applicable responses and explain if "other" is selected.

Funds are set aside in the agency's administration budget for use by all offices?

Access accommodation as line-item in the office's budget? Line item included in Community Development Block Grant, to the extent applicable.

Other (Specify): Oral interpreters, recordings and written materials, posted and printed notification. Town is in the process of acquiring TDD number and will use State number in the meantime.

5. Is your agency able to modify its programs/activities, if necessary, to provide reasonable accommodations to individuals (staff or the public) with disabilities?

Yes: The majority, if not all, of the Municipally controlled public facilities, where required, are reasonably ADA Accessible.



- Identify all of the policies and practices from your completed program policy section that do not or may not meet the requirements of Section 504 and may create barriers for individuals for individuals with disabilities.
- List all proposed actions or actions that have been or will be taken by your Agency to modify your policies/practices to ensure compliance with Section 504.
- Has the proposed action/action been identified as a financial and administrative burden? If so, how the conclusions were reached and list any alternative actions that may be taken that do not constitute a financial and administrative burden.
- List target dates for which action may be taken by your Agency to modify your policies/practices.

Barrier Identified	Proposed Actions/Modification to Remove Barrier	Could the action result in an undue financial/admin. burden or alter the nature of the Program/Activity (if yes, please identify how the conclusion was reached and list any alternative actions)	Target date of action
Sidewalks	Additional, as needed, curb cuts downtown business area	No	Ongoing
Municipal infrastructure facilities	To the extent feasible and required. ADA Compliance structure put in place	No	Ongoing
Community Parks and Improvements	ADA Compliant	Funded by Town Funds and Donation	Ongoing

III. PROGRAM ACCESS

This section evaluates the program local government access for individuals with disabilities. Please respond to the following questions with either a Yes, No, N/A, a description, list, or explanation when appropriate. If a question does not apply to your local government, then write "N/A" next to the question and explain.

1. Describe the analysis of all programs and activities and all aid, benefits and services to determine the degree to which they are accessible to qualified handicapped persons:

The town's recreation facilities have enjoyed a private donation which was used for ADA compliance at the time; CDBG Grant Funding requires ADA Compliance.

2. Describe methods that have been used to involve handicapped persons (or organizations representing handicapped persons) in the development of activities designed to achieve program accessibility:



No- Modification or corrective action: Click or tap here to enter text.

3. Describe approaches and special procedures adopted to ensure effective communications with project beneficiaries and/or members of the general public with disabilities, especially those vision, speech, and hearing impairments (*Methods include, but are not limited to: provision or auxiliary aids or presentation or materials in alternative formats qualified sign language and oral interpreters, readers, or the use of taped, large print, closed-captioned video, and Braille materials.*)

Oral interpreter on standby, Zoom meetings

4. Describe how the local government advertises to the public availability of auxiliary aids and services for effective communication to participate in the local government programs and services.

Signage, posters, legal/non-legal notices, municipal employees assisting/aiding those known to have disabilities, dissemination of information in Public buildings, Upper Coastal Plain Council of Governments

5. Describe how the local government will ensure that meetings, hearings, and conferences will be accessible for individuals with communication disabilities.

Public Notices provide in part "Anyone requiring special assistance should contact Town Clerk ahead of scheduled meeting".

6. Describe how an individual with a disability may request assistance and express their preference for auxiliary aids and services from the local government.

In person, by agent, by writing, telephone, email

7. Describe how the local government will provide auxiliary aids or services on request.

Varies depending upon what is requested, circumstances and nature of request.

8. List steps to ensure inclusion or a notice of the recipient's compliance with Section 504 in all materials and advertisements.

The Town, in all of its Public Hearing notices, requests for quotations, Requests for Proposals and CDBG-I Grant Related Contracts, states that the Funding for this Grant is from the Federal Government under the Community Development Block Grant Program, and that those benefiting financially or materially and any other way, are to act in accordance and subject to Section 504.

9. Has the local government installed a reader, developed Braille materials, audio recordings or other similar services and devices for persons with impaired vision?

Yes



16. List all local government activities where a sign language and/or oral interpreter, readers, and assistive listening devices might be needed to ensure that persons with hearing and visual impairments can fully participate in the program or activity (e.g. securing services in expeditious manner, department responsible for ensuring such services, policy source and date, date policy distributed to staff).

Might be needed at Town Board Meetings, but no known history of past need.

INFORMATION DISSEMINATION

1. Can copies of written materials be reasonably obtained by individuals with disabilities?
 Yes No
2. Have disability groups been included in the dissemination process?
 Yes No None known to exist in Town at present time. (10/15/2020)
3. Does the local government use all available print and broadcast media to ensure that all individuals with disabilities receive appropriate notification?
 Yes No
4. Does the local government disseminate information to all agencies or organizations that deal with persons with disabilities in the local government service jurisdiction?
 Yes No
5. Does all of the information disseminated by the local government include current non-discrimination policies?
 Yes No

If there are NOs to any of the above questions (#1-5), you must provide a modification or corrective action below:

[Click or tap here to enter text.](#)

PRINTED MATERIALS

1. Are written materials including posters with non-discrimination notices placed in physically accessible locations?
 Yes No
2. Can small print of posted announcements be read from a wheelchair?



or explanation when appropriate. If a question does not apply to your local government, then write "N/A" next to the question and explain.

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

- Yes - List steps to be taken to eliminate the limitations. Click or tap here to enter text.
 No

2. Has the local government examined all policies pertaining to program eligibility and admission criteria to determine if they had the purpose or effect of excluding or limiting the participation of individuals with disabilities in local government's programs and activities?

- Yes No- Modification or corrective action: Click or tap here to enter text.

3. Has the local government, in examining its policies on program eligibility and admission criteria, paid particular attention to those incorporating or establishing: (1) physical or mental fitness or performance requirements; (2) safety standards; (3) testing requirements; (4) educational requirements; (5) work experience requirements; (6) income level requirements (7) credit rating requirements; (8) requirements based on disability; (9) requirements that prohibit participation because of disability; and (10) insurability requirements?

- Yes No- Modification or corrective action: Click or tap here to enter text.

4. Has the local government altered or eliminated policies that have the direct or indirect effect of excluding or limiting the participation of individuals with disabilities in local government's programs and activities?

- Yes - List any policies that have been altered or eliminated. Click or tap here to enter text.
 No - Modification or corrective action: Click or tap here to enter text.
 N/A - Explain (e.g. no such policies found in review), then proceed to Question 6. No such policies found in review.

5. Has the local government communicated the policy changes to staff members and the public?

- Yes No- Modification or corrective action: Click or tap here to enter text.

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

- Yes - Proceed to Question 7 No - Proceed to Question 8

7. List all criteria (e.g., good health, residency requirements, letters of recommendation) and tests (including the skill, level of achievement, or other factors being tested, whether they are written or oral tests and the method of administration) used in the admissions process,



3. Review all written materials, tools, equipment or other aids or devices used for the program. Do any need modification?

- Yes - List steps such as the provision of auxiliary aids and equipment modification to ensure that program materials and equipment are accessible and usable. Click or tap here to enter text.
- No

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

- Yes- List alternative methods of providing accessibility that would not impose an undue financial or administrative burden. Click or tap here to enter text.
- No

5. Are any of the following services or benefits provided to program participants? (Check all that apply. If none provided, proceed to Question 6.)

- Transportation services
- Health services and insurance/benefits
- Housing
- Counseling services
- Employment services
- Food services
- Financial aid
- Social, recreational or athletic activities

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

- **List steps to ensure that:**
 - **The service/benefit is equally effective for and usable by persons with disabilities.**
 - **The administration of the service/benefit will be free from discrimination based on disability.**
 - **Communications will reach all persons, including those with hearing and sight impairments.**
 - **Effective application procedures to receive the services exist for persons with disabilities, including those with hearing and vision impairments**

Case by case basis depending upon the impairment and nature and extent of same.

VII. EMPLOYMENT POLICY AND PRACTICE

This section evaluates the local government's employment policy and practices to ensure equal opportunity employment for persons with disabilities. Please respond to the following questions with



- Selection and financial support for training, including apprenticeship, professional meetings, conferences and other related activities, and selection for leaves of absence to pursue training.
- Employer-sponsored activities, including social and recreational programs.
- Any other term, condition or privilege of employment.

To the extent applicable, the Employment Application referred to in VII. A. 1 above, State Statutes, and Town Ordinances regulate the VII. A. 5 bullets above.

EMPLOYMENT CRITERIA

1. Does the local government administer tests which accurately reflect the applicant's or employee's job skills or aptitude rather than the applicant's or employee's impaired sensory, manual, or speaking skills (except where those skills are the factors that the test is designed to measure)?

- Yes - Please answer Question 2.
- No - Modification or corrective action: Click or tap here to enter text.
- N/A - Explain (e.g. no such test/criteria used), then proceed to Next Section: *Pre-Employment Inquiries*. The employment application references Drug testing, hence, those offered employment might be required to complete a pre-employment drug test, or random unscheduled drug test.

2. What employment tests or criteria are used for judging potential employees and describe procedures to ensure that these criteria or tests do not discriminate against persons with disabilities, unless they are shown to be consistent with job necessity?

See #1 above.

3. If the local government uses an employment test or other criteria for selection that screens out or tends to screen out individuals with disabilities, can the local government show that the test score or other selection criteria is job related?

- Yes - Please answer Question 4.
- No - Modification or corrective action: Click or tap here to enter text.
- N/A - Explain (e.g. no such test/criteria used), then proceed to Next Section: *Pre-Employment Inquiries*. No such test used.

4. Describe methods 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.

Click or tap here to enter text.



accommodations can be made, when necessary, for an applicant or employee. List any job descriptions that were amended.

Review of job descriptions to be conducted for compliance at a yet undetermined future date.

6. Describe any training or other measures taken to ensure that employees and supervisors do not subject individuals with disabilities to discrimination because insensitivity or lack of knowledge.

No such formal training exists currently.

7. When the local government is undertaking affirmative action efforts, voluntary or otherwise, and inviting applicants for employment to indicate whether and to what extent they are disabled, does the local government meet the following conditions:

- a. State clearly either orally or in writing that the requested information is intended for the local government's affirmative action efforts? Yes No
- b. State clearly that the information is being requested on a voluntary basis, that it will be kept confidential and that refusal to give the information will not subject the applicant or employee to any adverse treatment? Yes No

If there are NOs to any of the above questions (#a -b) you must provide a modification or corrective action: Click or tap here to enter text.

VIII. OUTSIDE PERSONS AND ORGANIZATIONS

This section evaluates the local government's use and interaction with outside persons and organizations persons with disabilities. Please respond to the following questions with either a Yes, No, N/A, a description, list, or explanation when appropriate. If a question does not apply to your local government, then write "N/A" next to the question and explain.

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 II through IX. Include secondary recipients in your discussion.

No know persons or organizations exists at this time.

2. List steps to inform those listed in Question Number #1 of the organization's commitment to nondiscrimination on the basis or disability.

N/A

3. List those persons or organizations from Question Number #1 that receive significant assistance from the organization in the provision of aids, benefits or services to program



5. Give a date that the policy was established and distributed to staff and give a citation for the policy.

The Code of Federal Regulations Section referred to in number 4 above is part of the Federal Regulation governing Federal Government contracts and is binding upon the Town of Woodland from its inception of partaking of Federal Funding.

X. GRIEVANCE PROCEDURES

This section evaluates the local government's grievance procedures. Please respond to the following questions with either a Yes, No, N/A, a description, list, or explanation when appropriate. If a question does not apply to your local government, then write "N/A" next to the question and explain.

1. What procedures have been established to ensure that at least one person has been designated to coordinate compliance with Section 504?

The adoption of a Grievance Procedure in accordance with the Americans with Disabilities Act, as amended and supplemented.

2. Have there been obvious difficulties or complaints about the local government services from individuals with disabilities?

Yes – Proceed to Question 3 No - Proceed to Question 4

3. Describe how resolution of complaints and steps to resolve concerns/complaints is documented?

See #1 above.

4. What written procedures have been established to ensure that appropriate initial and continuing steps to notify participants, beneficiaries, applicants, etc. that the local government does not discriminate on the basis of handicap (24 CFR 8.54)?

See #1 above.

5. Does the local government have a written grievance procedure/policy for handling the prompt and equitable resolution of any complaints of discrimination based on disability?

Yes - ATTACH a copy of the current local government policy which should include the date the policy was established, the date the policy was distributed to staff, and the citation for the policy.

No - Modification or corrective action: Click or tap here to enter text.

6. Has the local government adopted procedures that incorporate due process standards and allow for prompt resolution of any complaints or alleged discrimination based on disabilities (24 CFR 8.53)?