

ACCESSIBILITY POLICY, PROCEDURES, AND IMPROVEMENT

The purpose of this Accessibility Plan is to promote accessibility and remove barriers for Marin City Community Development Corporation (MCCDC) team members, clients and stakeholders. MCCDC addresses accessibility concerns to enhance the quality of life for those served in our programs and services, implement nondiscriminatory employment practices, meet legal and regulatory requirements. It is our goal to meet the expectations of stakeholders and all persons served by our agency in the area of accessibility. This Accessibility Policy, Procedures and Improvement Plan is meant to enhance access to our programs, services, facilities so that we may enhance the empowerment of our community. It is to be updated annually.

Accessibility Policy

The MCCDC is committed to eliminating barriers and improving accessibility for people with disabilities. It is the policy of the MCCDC that all people, including people living with visible and invisible disabilities, have access to the goods and services provided by the MCCDC, including those provided through service contractors. All goods and services are to be provided in a manner that recognizes the principles of independence, dignity, integration and equality of opportunity.

The MCCDC will use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles:

- The MCCDC goods and services are provided in a manner that respects the dignity and independence of persons with disabilities.
- The provision of the MCCDC's goods and services to persons with disabilities are integrated with those provided to persons who do not have disabilities unless an alternative measure is necessary to enable a person with a disability to obtain, use or benefit from the MCCDC's goods and services.
- Persons with disabilities are given an opportunity equal to that of persons without disabilities to obtain, use or benefit from the MCCDC's goods and services.

Assessment of Sites and Practices

In order to continually improve accessibility, MCCDC examined its identification of barriers in the following areas:

- architectural (physical),
- environmental,
- attitudinal,
- financial,
- communication,
- transportation,
- community integration,
- technology and
- employment.

Governing Regulations

The 1959 Unruh Civil Rights Act. California's civil rights law, Civil Code Sections 51–55.1, also known as the Unruh Civil Rights Act, establishes the principle of equal rights for persons with disabilities and prohibits discrimination on the basis of disability in business establishments, franchises and the like stating:

"All persons within the jurisdiction of this state are free and equal, and no matter what their sex, race, color, religion, ancestry, national origin, disability, medical condition, genetic information, marital status, or sexual orientation are entitled to the full and equal accommodations, advantages, facilities, privileges, or services in all business establishments of every kind whatsoever."

The 2013 California Building Code –Title 24 of the California Code of Regulations governs the design and construction of all building occupancies and associated facilities and equipment throughout California. It contains requirements for accessibility in addition to the structural, mechanical, electrical, and plumbing systems, and requires measures for energy conservation, green design, construction and maintenance, and fire and life safety. Accessibility requirements are found in Chapter 11B of Title 24: "Accessibility to Public Buildings, Public Accommodations, Commercial Buildings and

Public Housing.” Chapter 11B contains some limited, specific requirements for “Outdoor Developed Areas,” including beaches, day use areas and vista points, camping facilities, picnic areas, parking lots and trails and paths (see §11B-246). The California Building Code is updated on a triennial basis and the most recent edition should be referenced.

When the construction cost exceeds the current valuation, and the local enforcing agency determines that the cost of compliance is an “unreasonable hardship,” as defined by the California Building Code Chapter 2, Section 202, full compliance is not required. Compliance with accessibility regulations still must be provided either by equivalent facilitation or to the greatest extent possible without creating an unreasonable hardship, but in no case would the cost of compliance be less than 20% of the construction costs of the new work. In choosing which accessible elements to provide, priority should be given to those elements that will provide the greatest access in the following order: 1) An accessible entrance; 2) An accessible route to the altered area; 3) At least one accessible restroom for each sex; 4) Accessible telephones; and 5) Accessible drinking fountains.

In October of 2014, MCCDC team members began conducting physical inspections of the Marin City Community Development Corporation (MCCDC) offices at 441 Drake Avenue in Marin City. We used the 15 page ADA Checklist for Readily Achievable Barrier Removal. Inspections must be conducted annually and have been expanded to include the other areas identified above.

Architectural or Physical Barriers

Architectural or physical barriers are generally easy to identify and may include steps that prevent access to a building for an individual who uses a wheelchair, narrow doorways that need to be widened, bathrooms that need to be made accessible, the absence of light alarms for individuals who have a hearing impairment and the absence of signs in Braille for individuals who have visual impairments. These are identified by the MCCDC Executive Director’s annual inspections, safety inspections and observing

day to day activities. MCCDC implemented “Monthly Safety Talks” addressing safety concerns at our facility and at job sites. It is apparent that although barriers have been identified, there is a need to regularly review these barriers.

Environmental Barriers

- Environmental barriers can be interpreted as any location or characteristic of the setting that compromises, hinders, or impedes service delivery and the benefits to be gained. Some service sites may be located in areas where the person served and/or personnel do not feel safe or feel that confidentiality may be risked. In addition to such external environmental barriers, internal barriers may include noise level, lack of sound proof counseling rooms, highly trafficked areas used for service delivery or type or lack of furnishing that impact the comfort level of the persons served and our team members.
- Lighting may be a barrier, for instance, if fluorescent lighting is used and the flicker precipitates seizure activity in an individual. The physical office environment could present a barrier if it is noisy or is very open structure and an individual is easily distracted by activity. Fragrances could be considered an environmental barrier as many persons have allergic reactions to various smells and do not perform at their best under such conditions.
- Although MCCDC doesn’t conduct a formal assessment in this area, team members are aware of the need to accommodate reasonable requests in this area. Examples of general environmental adaptations include light alarms for individuals with hearing impairment, hearing protection, climate control, vehicle modifications such as seat belt extenders and lifts, ergonomic accommodations such as chairs, tables and computer screens, ergonomic keyboards and other modifications such as revised work schedules that have been made to meet requests.
- MCCDC team members provide documents underscoring how we support client concerns and we collect input to determine what improvements need to be made to better meet client needs. MCCDC reviews satisfaction surveys annually to ensure that environmental accessibility requests are addressed.

Attitudinal Barriers

Team member trainings addressing attitudinal and workplace issues occur during our weekly Team Member meetings. There have been trainings for team members in: team member skill development, protecting client privacy and confidentiality, health and safety for team members and clients, job development and employment services best practices, cultural competency and more. Selected team members are also being provided web-based training on job development for people with disabilities and attending on-site workshops. Such trainings are provided annually.

- Attitudinal barriers may include the terminology and language that the organization uses in its literature or when it communicates with individuals with disabilities, other stakeholders and the public, how individuals with disabilities are viewed and treated by the organization, their families and the community, whether or not client input is solicited and used, whether or not the eligibility criteria of the organization screens out individuals with specific types of disabilities.
- MCCDC conducts an annual satisfaction survey. This survey includes community and center based accessibility, attitudinal behaviors of the agency and integration of individuals served in the community. Examples of topics covered on the survey:
 - Are MCCDC staff, services, and facilities accessible to meet your needs?
 - Does MCCDC provide prompt communication and resolution for concerns?
 - In the future, MCCDC will be gathering input from our clients, their family/guardian and other support staff at their annual intake meeting.
- To educate our team members and community on the advantages of eliminating barriers and promoting opportunities for people with disabilities, MCCDC provides disability awareness and terminology/language training to all team members annually. MCCDC team members speak to organizations, groups and the media
- The major source of education comes from the clients served and their family members who are the biggest advocates for MCCDC programs and services.

- To increase communication on the benefits of promoting opportunities for people with disabilities, the following steps are continually being considered as opportunities arise.
 1. Marketing Information Packets
 2. Press Releases
 3. Radio and Television Public Service Announcements
 4. Networking through Membership of Appropriate Professional Organizations
 5. Social Media

Financial Barriers

- Financial barriers include insufficient funding for service and supports. MCCDC advocates legislatively for increased funds and promotes activities to directly raise money for the support of a service or a person served. Members of the Executive team have attends local government convening's advocating for greater support of employment services programs and activities and provides input regarding the need for appropriate funding for services and support for our clients with disabilities. MCCDC will analyze internal efficiency and staffing needs as well.
- To help MCCD clients and team members overcome financial barriers, MCCDC offers basic financial counseling through our Affordable Housing Program.

Communication Barriers

When communicating with a person with a disability, the Association and its service contractors shall do so in a manner that respects the person's dignity and independence. Communication barriers include the absence of a teletype machine (TTY), the absence of materials in a language or format that is understood by the persons receiving services or the promotion of a website that presents difficulty to access information. Though we do not own a teletype machine, we provide access to a telephone in our reception area with access to the Language Line and over 50 translators. We provide alternative formats like large print that could be developed as needed. MCCDC offers an accessible, user-friendly website that makes it possible to



share information about our agency and its programs and services, taking into account differences in ability among Internet users worldwide.

MCCDC has available selected materials in large print text and on CD-R for use with screen reading software, or for a client to use at home on their personal computer. The following documents are available in this format:

- Welcome Statement
- Customer Safety Training
- Participant Grievance Procedures
- Participation Agreement and Program Rules
- Program Description
- Release of Employment Information
- Emergency Information Form
- Equipment Use Agreement
- Master Application Form
- Team Member Manual and Enrollment Documentation Receipt

A digital recorder is also available to be signed out upon request at the front desk for individuals who would like to record a group, presentation, or discussion of any type. This may be beneficial for individuals who have trouble taking notes, for those with learning disabilities, or simply for parties interested in a transcript of a particular offering. Clients can listen to the recording by playing it back on the device. Additionally, team members can help download the recording and either burn it onto a CD, or offer to e-mail it to the client. Files can be played in any personal computer, using a multitude of free and universally available media players.

A special keyboard with keys that have large print and high contrast letter keys is also available to assist those with visual impairments

Transportation Barriers

- Transportation barriers include persons being unable to reach service locations or being able to participate in the full range of services, supports or activities offered. Transportation has been identified as a major barrier to employment. MCCDC has an agreement with Whistlestop (Marin-based disabled transportation service) to provide transportation for disabled clients and attempts to place individuals in jobs that are on routes that are conducive to assessing public transportation. MCCDC team members attempt to promote natural supports in meeting transportation needs as well.
- MCCDC is located within four blocks of major bus lines and a public transit hub at the Gateway hopping Center. There is an accessible parking space that is wide enough for a van that is clearly marked. Funding for a new handicap accessible ramp has been secured and it will be installed by November 2016.

Community Integration Barriers

Barriers to community integration include any barrier that would keep the person served from returning to full participation in their community job site. Accommodations may be needed for the persons served to return to their previous community job site.

Technology Barriers

Technology barriers could include the evolving technology, the upkeep of equipment, assistive technology and issues more specific to the populations served.

- A large trackball mouse is available for use in the computer center for those that may need alternative means of a pointing device. Examples may include those that have difficulty with fine motor skills, or who need larger mouse buttons to click. This mouse as very highly rated for these purposes an alternative pointing device.
- A sound amplification device is also available for Individuals that may have hearing impairments.

- Additional requests are welcomed and will be received through any avenue the client chooses (talking to team members, using a comment card, asking at the front desk, sending an electronic request via the website, etc.) and will be evaluated per the Reasonable Accommodations Policy.
- Additionally, any forms will be made available in different formats as needed, be they large print, or other languages. We will make arrangements for braille options as needed.

Employment Barriers

- MCCDC prohibits discrimination in all employment practices including job applications procedures, hiring, firing, advancement, compensation, training and other terms, conditions and privileges of employment. It applies to recruitment, advertising, tenure, layoff, leave, fringe benefits and all other employment related activities. The Human Resource Department reviews and updates policies as needed.
- The employee's direct supervisor and/or Human Resource Department may accommodate a request from an employee for reasonable accommodations. All requests for reasonable accommodations are handled on a case by case basis. Examples of accommodations may include, but not limited to: making existing facilities used by employees readily accessible to and usable by individuals with disabilities, allowing part time or modified work schedules, adjusting marginal job requirements, such as the need to hold a driver's license, that are nonessential for performing specific jobs, acquiring equipment or devices to assist in employee's job and providing reader for persons with blindness, interpreters for individuals with deafness, when feasible.

There may be barriers identified that MCCDC doesn't have the authority or resources to remove; effective accommodations may be the appropriate action to be taken in those circumstances.

MCCDC may identify short and long range actions to be taken. Barrier removal that is not currently achievable may be achievable later when the organization has more resources. The organization's planning may have options for referral to and the use of other generic services and networks that may be more accessible.

The Accessibility Plan lists the barriers that limit access to programs and services, provide a detailed outline of the methods to be used in removing the barriers, develop a schedule for taking necessary steps to achieve a barrier-free environment. If the time period for achieving compliance is to be longer than one year, the plan should identify interim steps to provide program access. The plan may identify person(s) responsible for implementing the plan.

Other Issues and Barriers

MCCDC collects data from clients and stakeholders through our Satisfaction Survey. We shall expand the specific questions as needed to better address accessibility and remain in touch with the developmental and service delivery needs of our team members, clients and stakeholders.

- **Assistive Devices:** A person with a disability may provide their own assistive device for the purpose of obtaining, using or benefitting from the MCCDC's goods and services, unless said device may pose a risk to the health and safety of themselves or others, in which case the MCCDC may offer a person with a disability other reasonable measures to assist him or her in obtaining, using or benefitting from goods and services, where such other measures are available. In cases where an assistive device (for example, an assistive listening device) is required for access to the MCCDC's goods, services, or events (such as the Annual Conference) but where the person with a disability requires assistance to obtain said device, the MCCDC will take reasonable measures to assist in obtaining access to such devices if notified at least 30 days in advance of such requirements.
- **Service Animals:** The MCCDC and contractors/agents providing services on MCCDC's behalf shall accommodate the use of service animals by people with

disabilities who are accessing MCCDC services, programs, courses or events unless the animal is otherwise excluded by law. It is the responsibility of the person with a disability to ensure that their service animal is in good health, does not pose a risk to the health and safety of others and is under their care and control at all times.

- **Support Persons:** Where a person with a disability is accompanied by a support person, the MCCDC and its service contractors shall ensure that both persons are permitted to enter the premises together and that the person with a disability has access to the support person while on the premises. The support person can be a paid support worker, volunteer, a friend or a family member.
- **Service Disruption/Notice of Service Disruption:** Temporary disruptions in the MCCDC's services and facilities, and those of service contractors, may occur due to reasons that may or may not be within the MCCDC's control or knowledge. MCCDC will make every effort to provide notice of disruptions to the public and/or MCCDC members.
- **Feedback:** Feedback from MCCDC team members, clients and stakeholders and members of the public is welcome. Feedback about the MCCDC's delivery of goods and services to persons with disabilities may be given by telephone, in person, in writing, or in electronic format.

Training:

The MCCDC will ensure that all team members and volunteers receive appropriate training on customer service requirements in regard to people with disabilities. The format of training will vary based on individual circumstances and records of training will be kept in team member personnel files.



Comments and Concerns

If you have a comment or concern, please contact our Human Resources Department at (415) 339-2837 or via email at info@marinitycdc.org. You can also reach out directly to our Executive Director at (415) 339-2837, ext. 277.