

TEXAS PANHANDLE CENTERS

ADA SELF-EVALUATION AND TRANSITION PLAN

Revised:
March 2024

Self-Evaluation Checklist

Date 03/01/2024

Person Completing this form:

<u>Jennifer McKay, M.A., LPC</u>	<u>Program Specialist, ADA Coordinator</u>
Name	Title
<u>Quality Management</u>	<u>806-351-3386</u>
Department	Phone Number

Program, Activity or Service: Texas Panhandle Centers

A. List of People Consulted

1. Planning:
 - Executive Director
 - Chief Financial Officer
 - Director of Human Resources
 - Director of Behavioral Health
 - Director of Intellectual and Developmental Disabilities/Authority
 - Director of Quality Management
2. Site Inspection:
 - Maintenance Department
 - Service Site Supervisors

B. Document Preparation

Jennifer McKay, M.A., LPC

C. Implementation

All TPC staff, volunteers, interns, & contractors

D. Participation of Disabled Persons

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

The Center utilizes two methods of obtaining customer satisfaction information (please note: All persons receiving services have a disability as defined by ADA) related to services and accessibility.

1. Individuals are all provided a "Individual Rights" handbook at admission.
2. Individuals are informed of the accessibility of the Rights Officer. The Rights Officer is notified of any complaints regarding accessibility immediately.

This plan is submitted to the Planning and Network Advisory Committee, which is a group constituted by stakeholders (individuals, family members and community members) for review and approval.

E. Nature of Program

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

Texas Panhandle Centers provides services to persons residing in a 21-county geographic service area. The primary individuals of Behavioral Health Services are those people identified as priority population by HHSC. The primary individuals of Services for persons with Intellectual or Developmental Disabilities (IDD) are persons identified as having a diagnosis of intellectual disability prior to their 18th birthday or developmental disability prior to their 22nd birthday as defined by HHSC. Early Childhood Intervention (ECI) provides services to families with children (birth to 3 years) who have developmental delays and disabilities. For details, refer to the performance contract.

Behavioral Health Services include:

- Intake and Assessment
- Case Management/Care Management
- Outpatient Psychiatric Services for Adults and Children
- Psychosocial Rehab Services
- Supported Employment Services
- Supported Housing Services
- Mobile Crisis Outreach (MCOT)
- Crisis Stabilization
- Offenders with Mental Illness Program (TCOOMMI)
- Respite Services
- Youth & Family Services
- Military Veteran Peer Network (MVPN)
- Substance Use Disorder (SUD) Treatment Services

IDD Services include:

- Intake & Assessment
- Community Living Options Information Process (CLOIP)
- Pre-admission Screening and Resident Review (PASRR)
- Service Coordination
- Early Childhood Intervention Services
- HCS Community and Residential Services
- Texas Home Living Waiver Services
- Day Habilitation/Individual Skills and Socialization (ISS)
- Nursing Services
- Psychological Services
- Respite Care Services
- Vocational training & job placement services

Early Childhood Intervention Services include:

- Audiology/Hearing
- Vision Services
- Assistive Technology
- Targeted Case Management
- Family Education
- Health Services
- Nutrition Services
- Occupational Therapy
- Physical Therapy
- Speech-Language Therapy
- Infant Massage
- Specialized Skills Training
- Transition to Services Beyond ECI

F. Recruitment and Advertisement

- 1. Does the public entity 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 E. If yes, describe briefly the activities involved and materials used.

No

Yes

The Center is prohibited from advertising for the purpose of soliciting additional external customers. The Center does engage in a public service and educational campaigns designed to inform the general public of the Center’s services and to provide a medium for first contact. The Center utilizes a multi-media approach to negate the impact of single sensory impairment.

Type of Activity	Steps taken to ensure full participation of people with disabilities
Governance meetings	Board meetings are conducted in public buildings or Center buildings, which meet ADA accessibility requirements.
Brochure/ Pamphlets	Statements regarding non-discrimination policy were added to the Center’s primary brochure. This includes information regarding assistance through Lubbock/Amarillo Deaf or TTY Services for people with hearing impairments. The majority of the agency pamphlets, brochures and informational material are also published in Spanish.
Direct staff contact (face to face contacts)	Staff are trained to provide information about services in the language that the person understands. This includes reading materials for people who are unable to read; utilizing interpreters, as needed; assistance in completion of required documentation (including application for services); use of TTY or Lubbock/Amarillo Deaf; and home visits as needed.

- 2. Turn to section “J” (Outside Persons and Organizations) of this checklist. List there any “outside” persons and organizations involved in these recruitment, advertising, or information efforts.**

See Section J, 1 - 4

3. Turn to section “K” (Facilities Used). List there all facilities, and parts of facilities, used during recruitment and advertising efforts, including those not owned and/or operated by the public entity (e.g., leased or otherwise used). Are these facilities accessible? IF not, is information available in an accessible location?

See Section K, 1 - 5

G. Program Eligibility Requirements and Admission

1. Are any criteria or tests used in the admission process? If no, proceed to “7” below. If yes, list and briefly describe 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.

No

Yes

In order to qualify for services, persons must:

IDD Services

1. Demonstrate onset of symptoms prior to 18th birthday for an intellectual disability, or 22nd birthday for Related Conditions (RC).
2. Have a Full-Scale IQ below 70, or demonstrate significant deficiencies in adaptive living skills for RC.
3. Established eligibility via Determination of Intellectual-Developmental Disabilities (DID) through formal evaluations approved by HHSC by a Certified Authorized Provider (CAP).

MH Services

Member of priority population* (meeting DSM-5TR criteria) as determined by Licensed Practitioner of the Healing Arts (LPHA).

*NOTE: For details on what the specific requirements for “priority population” refer to the Center’s Performance Contract established by HHSC.

ECI Services

Children, ages 0-3, are referred to services once functional deficits become evident or developmental milestones become delayed by several months.

2. List all criteria and tests from “1” above that have (or could have) a disproportionate, adverse impact on disabled program applicants. Discuss briefly the (potential) negative impact for each.

This criterion is utilized to establish disability and does not have a disparate effect.

3. For each criterion or test listed in “2” above that you design and administer, discuss briefly alternative criteria or tests that will be used to ensure non-discrimination. This could include, in limited instances, not using a criterion or test.

N/A

4. 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 disabled persons, or class(es) of disabled persons (possibly including, in limited instances, not using a criterion or test).

N/A

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

Assessments are conducted by trained and licensed staff, which negates the negative impact of disabilities. As previously stated, these assessments are conducted to establish disability which then qualifies individuals for services. Intake staff is trained to utilize alternative testing/assessment tools to accommodate various disabilities (and to utilize interpretive services necessary to obtain information).

6. Is an interview required before an applicant enters the program? If no, proceed to “7” below. If yes, briefly discuss the interview process and list steps to be taken (including the provision of auxiliary aids, as required) to ensure non-discrimination in interviewing.

No

Yes

Interviews are for the purpose of assessment to include identification of disabilities as a justification for program services. Assistance is available for the purpose of providing interpretive services.

7. Are any forms required for admission in the program testing or submission or other admissions criteria? If no, proceed to “10” below. If yes, what are the forms, and are any available in alternative formats (e.g., taped, Braille, reader)?

No

Yes

Staff complete all forms.

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

Staff are available and/or interpreter services for reading assistance. Staff completes applications with individuals.

9. Do the forms listed in “7” above contain a notice of your organization’s compliance with the ADA? If no, proceed to “10” below. If yes, list steps to ensure the inclusion of notices of your compliance with the ADA in all materials.

No

Yes

MH Services intake staff give advisory statements which makes potential individuals aware that specialized services are available for disabled persons to facilitate program entry (when being informed of their rights).

10. List steps to ensure 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.

This question is not applicable, as people must demonstrate a disability to qualify for services. Persons who cannot demonstrate disabilities do not typically meet service requirements.

11. Turn to section “J.” List there any “outside” persons and organizations involved in testing, collecting or evaluating admissions criteria.

N/A

12. Turn to section “K.” List there all facilities and parts of facilities used for testing, collecting, or submitting forms and admissions criteria and other activities related to program eligibility requirements, including facilities not owned or operated by the public entity (e.g., leased or otherwise used).

See section I for detailed description of compliance issues by facility location.

H. Participation in the Program

1. Are post-admission inquiries made regarding disabled status to make accommodations for disabled persons? If no, proceed to “2” below. If yes, list steps to ensure that information is gathered voluntarily, not used to affect any disabled person adversely and kept confidential.

No

Yes

- **Employment**
Information is obtained through post hire inquiries to determine if applicant requires accommodations. This information is maintained in confidential personnel medical records.
- **Services**
All post-admission inquiries are designed to facilitate acquisition of services and eliminate barriers. This information is maintained in confidential client files.

- 2. Is there an orientation for new participants?** If no, proceed to “3” below. If yes, briefly describe the orientation and materials used, and list steps to ensure effective communications and usable materials (in alternative formats) for all participants.

No

Yes

Staff provide program orientation. Multilingual and American Sign Language interpreters are available.

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

The programs assess individual’s needs utilizing standardized assessment protocols such as: uniform assessments, standardized psychological tests, GAF assessment, etc. An application for service is completed which includes intake forms, financial statements, consent forms, medical and psychiatric histories, case management assessment, etc.

- 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.**

Alternative modalities are utilized for written and visual materials to include reading assistance. Staff are available to make home visits thus negating any transportation needs.

- 5. Would any steps pose an undue financial or administrative burden?** If yes, list alternative methods of providing accessibility that would not impose an undue financial or administrative burden.

No

Yes

- 6. What elements or activities are included in the program (e.g., vocational services, music therapy, retirement services, activities of daily living, leisure skills training, supported housing, supported employment, structured recreational and leisure outings, etc.)?**

All of the above

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

1. Specialized transportation (wheelchair accessible vans with lifts and tie down straps).
2. Specialized dietary and speech services.

8. Are any of the following services or benefits provided to program participants (unless already covered in “6” above)? If none is provided, proceed to “9”.

- | | |
|---|---|
| <input checked="" type="checkbox"/> Transportation Services | <input checked="" type="checkbox"/> Counseling Services |
| <input checked="" type="checkbox"/> Employment Services | <input checked="" type="checkbox"/> Health Services |
| <input checked="" type="checkbox"/> Housing | <input type="checkbox"/> Food Services |
| <input checked="" type="checkbox"/> Financial Aid | <input checked="" type="checkbox"/> Social, Recreational or Athletic Activities |

List other services provided to program participants.

- | | | |
|----------------------|----------------------|-----------------------------|
| Medication Services | Nursing Services | Speech-Language Therapy |
| Job Development | Job Training | Specialized Skills Training |
| Psychiatric Services | Job Coaching | Assistive Technology |
| Case Management | Physician Services | Family Education |
| Audiology/Hearing | Nutrition Services | Infant Massage |
| Vision Services | Occupational Therapy | Physical Therapy |
| | Transition Services | |

List Steps to ensure that Service/benefit is equally effective for and usable by disabled persons; 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 disabled persons (including those with hearing vision impairments).

It is the function of the interdisciplinary team to determine any specialized accommodations, which are required to maximize service utilization, assesses each person’s needs. The function of the service coordination/ case management unit is to eliminate barriers to services for all recipients both internal and external to the Center.

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.

The facility pursues program participation as this provides the basis of reimbursable services by:

1. Providing transportation to and from program sites.
2. Providing case management to include linkage services.
3. Conducting service satisfaction questionnaires designed to improve participant satisfaction.
4. Ensuring that notification of scheduled services is provided both orally and in writing.

10. Are there boards, councils or similar bodies on which program participants sit? If no, proceed to “11” below. If yes, list steps to ensure equal opportunities for selection to, and participation in such boards by disabled persons.

No

Yes

Representation within these governing bodies requires individual/disabled participants or family members/guardians which represent the disabled party.

11. Turn to section “J”. List there any “outside” persons or organizations involved in any aspect of the program.

N/A

12. Turn to section “K”. List there all facilities, and parts of facilities, used during the program, including those not owned and/or operated by the recipient (e.g., leased or otherwise used).

N/A

13. Are each of these facilities accessible to people with disabilities, including people who use wheelchairs? If not, is the program, “when viewed in its entirety, “accessible””? If no, what steps will be taken to make it accessible? (If structural changes are necessary for building the public entity owns or operates, this should be documented in the transition plan.)

No

Yes

I. Staff Information

List steps to ensure that all staff involved in this program (e.g., recruitment, admission, testing, 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.

1. Staff are informed at the time of employment of the agency’s policy regarding ADA accommodation.
2. Staff receive periodic (annual and biannual) training which reaffirms the agency’s participation.
3. Contracts with providers include the requirement not to discriminate.

J. “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).

Contracted Services:

Avail Solutions, Inc.
Oceans Behavioral Health
East Texas Behavioral Health Network (ETBHN)
Texas Council on Offenders
Wood Group
Peer Providers

Supported Home Living and Respite Providers
Texas Rehabilitation Commission
Individual Host Home Providers
Martin Tipton Pharmacy
Northwest Texas Behavioral Health
Care Today
Regence Health Network

- 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.**

Each contract includes statements that require the contractor not to discriminate on the basis of disability.

- 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 alternation, and/or changes in or discontinuation of the relationship.)

N/A

K. 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 sections “D” through “F” 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.)**

Amarillo

Wallace Street Building 501 – Administration, ECI
Administrative headquarters includes Service Directors, Authority functions, Purchasing, Quality Management, IT, Early Childhood Intervention program headquarters serving children 0-3 years of age with developmental delays

through case management, speech, occupational, physical, and other therapies.

Wallace Street Building 503 - IDD Services

Services for people diagnosed with Intellectual Disabilities or Related Conditions. Includes Intake and Admissions, and Service Coordination HCS & TxHmL administrative offices are also located at this address.

Wallace Street Building 504 – IDD Provider Services

Services for people diagnosed with Intellectual Disabilities or Related Conditions. Training is provided on daily living skills and supportive employment with an emphasis on community inclusion. Specialized adaptive equipment for transportation and communicative purposes is available.

Polk Street – Adult Mental Health Clinic

Provides psychiatric services to adults meeting the HHSC defined MH Population. Fully accessible program – with the majority of services provided in vivo. Case Management, skills training, supportive housing, supportive employment, Psychosocial Rehabilitation, Intake and Admissions for MH services.

South Taylor Street – Children’s Mental Health Clinic

Provides psychiatric services to children meeting the HHSC defined MH Population. Fully accessible program – with the majority of services provided in vivo. Case Management, skills training, supportive housing, supportive employment, Psychosocial Rehabilitation, Intake and Admissions for MH services.

North Taylor Street – Mental Health Clinic, Homeless

Provides psychiatric services to adults meeting the HHSC defined MH Population. Fully accessible program – with the majority of services provided in vivo. Case Management, skills training, supportive housing, supportive employment, Psychosocial Rehabilitation. This clinic houses the PATH, MCOT, ACT, Wellness, SUD, and OSAR programs.

Hardy Street – Crisis Respite

Provides short-term, community-based, residential crisis treatment to individuals 18 and older, who have low risk for harm to self or to others and may have some level or presence of functional impairment and require direct supervision and care, but do not require hospitalization. This building also houses the Peer Support and Better Living programs.

ASCI Amarillo - IDD Provider Services

Services for people diagnosed with Intellectual Disabilities or Related Conditions. Training is provided on daily living skills and supportive employment with an emphasis on community inclusion. Specialized adaptive equipment for transportation and communicative purposes is available.

Borger

ASCI Borger - IDD Provider Services

Services for people diagnosed with Intellectual Disabilities or Related Conditions. Training is provided on daily living skills and supportive employment with an emphasis on community inclusion. Specialized adaptive equipment for transportation and communicative purposes is available.

Borger Clinic – Mental Health Clinic

Adult and Children’s Mental Health Clinic provides psychiatric services to persons meeting the HHSC defined MH Population. Fully accessible program – with the majority of services provided in vivo. Service Coordination, supportive housing, and supportive employment. Psychosocial Rehabilitation Program, Supported Employment and Supportive Housing services are also provided out of this building.

Clarendon

Clarendon Clinic – Mental Health Clinic

Adult and Children’s Mental Health Clinic provides psychiatric services to persons meeting the HHSC defined MH Population. Fully accessible program – with the majority of services provided in vivo. Service Coordination, supportive housing, and supportive employment. Psychosocial Rehabilitation Program, Supported Employment and Supportive Housing services are also provided out of this building.

Dumas

ASCI Dumas - IDD Provider Services

Services for people diagnosed with Intellectual Disabilities or Related Conditions. Training is provided on daily living skills and supportive employment with an emphasis on community inclusion. Specialized adaptive equipment for transportation and communicative purposes is available.

Dumas Clinic – Mental Health Clinic

Adult and Children’s Mental Health Clinic provides psychiatric services to persons meeting the HHSC defined MH Population. Fully accessible program – with the majority of services provided in vivo. Service Coordination, supportive housing, and supportive employment. Psychosocial Rehabilitation Program, Supported Employment and Supportive Housing services are also provided out of this building.

Hereford

ASCI Hereford - IDD Provider Services

Services for people diagnosed with Intellectual Disabilities or Related Conditions. Training is provided on daily living skills and supportive employment

with an emphasis on community inclusion. Specialized adaptive equipment for transportation and communicative purposes is available.

Hereford Clinic – Mental Health Clinic

Adult and Children’s Mental Health Clinic provides psychiatric services to persons meeting the HHSC defined MH Population. Fully accessible program – with the majority of services provided in vivo. Service Coordination, supportive housing, and supportive employment. Psychosocial Rehabilitation Program, Supported Employment and Supportive Housing services are also provided out of this building.

Pampa

ASCI Pampa - IDD Provider Services

Services for people diagnosed with Intellectual Disabilities or Related Conditions. Training is provided on daily living skills and supportive employment with an emphasis on community inclusion. Specialized adaptive equipment for transportation and communicative purposes is available.

Pampa Clinic – Mental Health Clinic

Adult and Children’s Mental Health Clinic provides psychiatric services to persons meeting the HHSC defined MH Population. Fully accessible program – with the majority of services provided in vivo. Service Coordination, supportive housing, and supportive employment. Psychosocial Rehabilitation Program, Supported Employment and Supportive Housing services are also provided out of this building.

Perryton

ASCI Perryton - IDD Provider Services

Services for people diagnosed with Intellectual Disabilities or Related Conditions. Training is provided on daily living skills and supportive employment with an emphasis on community inclusion. Specialized adaptive equipment for transportation and communicative purposes is available.

Perryton Clinic – Mental Health Clinic

Adult and Children’s Mental Health Clinic provides psychiatric services to persons meeting the HHSC defined MH Population. Fully accessible program – with the majority of services provided in vivo. Service Coordination, supportive housing, and supportive employment. Psychosocial Rehabilitation Program, Supported Employment and Supportive Housing services are also provided out of this building.

- 2. Using the Texas Accessibility Standards and the ADA Accessibility Guidelines, list below for each facility (or portion thereof) inaccessible feature that limits program accessibility, but which can be addressed by means other than structural changes. For each feature, list non-structural measures that will be taken to ensure accessibility when the program is “viewed in its entirety,” including: Relocating the activity to accessible space, Being able to relocate the activity to accessible space, upon notice of the needs of a qualified disabled**

person, **Revising the structure or format of the activity so the space is not needed, Modifying or redesigning equipment; Making home visits or other alternative delivery services; or Otherwise achieving program accessibility; and The time frame for compilations of each correction.**

Site	Accessibility Issue	Action to take	Estimate Completion Date	Actual Completion Date
N/A	N/A	N/A	N/A	N/A

If non-structural changes cannot achieve program accessibility, place the feature on your transition plan for necessary structural changes. Responsible parties:

Plan of Action/Plan of Correction – by Site

Site #	Site	Accessibility Issue(s)	Action to be taken	Estimated Completion Date	Actual Completion Date
N/A	N/A	N/A	N/A	N/A	N/A

- List steps to ensure that all future construction and renovation work will comply with the architectural and accessibility standards (exclude projects managed by Central Office Maintenance and Construction).**

All contracts for facilities will refer to the “Texas Accessibility Standards” as the construction standard for ADA reference.

- List steps to ensure periodic communications with (potential) disabled program participants concerning accessible and inaccessible facilities.**

All program participants by definition are disabled. Service coordinators, case managers, and other staff make participants aware of accessibility issues to include accessible restroom (toilet) facilities.

- 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)?** 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: Only those programs that uniquely concern the preservation and experience of the historic property itself are covered by this exemption. If the program held at a historic facility is not a “historic preservation” program, it must be relocated if structural accessibility is not possible.)

No

Yes

L. Employment

- List safeguards in place to ensure that all employment decisions are made without discrimination on the basis of disability, and that such decisions do not**

limit, segregate, or classify applicants or employees based on disability in a way that adversely affects their employment opportunities or status.

- All position vacancies are posted and advertised at the Administration Building on the Center Website and other employment sites such as Indeed.
- Interviews are conducted with prepared questions, which are reviewed by HR prior to interviews for EEO issues.
- Staff are trained in proper interview techniques to include ADA issues involving the selection process.

- 2. Are you participating in a contractual or other arrangement or relationship that subjects qualified applicants or employees with a disability to discrimination (i.e., relationships with employment or referral agencies, labor unions, or organizations that provide fringe benefits, training, or apprenticeship programs)?** If yes, list steps to be taken to ensure non-discrimination in the future.

No

Yes

- 3. Analyze the following aspects of employment to make certain that no discrimination based on disability exists (including discrimination which occurs due to an inaccessible facility): Recruiting, advertising and processing applications for employment; Hiring, upgrading, promotion, award of tenure, demotion, transfer, layoff, termination, right of return from layoff, and rehiring; Rates of pay or another form of compensation and changes in compensation; Job assignments, job classifications, organizational structures, position descriptions, lines of progression, and seniority lists; All forms of leave; Equal benefits and privileges available by virtue of employment, whether or not administered by the recipient; 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.**

N/A

- 4. Do you have a policy concerning “reasonable accommodation” that specifies the decision-making process for identifying, arranging for and/or paying for, and determining undue hardship for reasonable accommodation?** If no, list steps to be taken to establish a reasonable accommodation policy.

No

Yes

Texas Panhandle Centers will abide by established HHSC policy regarding accommodations for disabled employees.

- 5. What employment tests or criteria are used for evaluating potential employees? Describe procedures to ensure that these criteria or tests do not discriminate against disabled persons unless they are shown to be consistent with job necessity and are directly related to the essential functions of the position.**

(a) **Criminal Records**

No adverse impact.

(b) **Drug Screening**

No adverse impact.

(c) **Interview selection process consistent with HHSC methodology.**

No adverse impact.

(d) **CANRS**

No adverse impact.

(e) **Driving History**

Job necessity

6. Describe methods to identify the job-related characteristics of tests and criteria used in employment decisions.

- Job analysis identifies essential and non-essential job tasks.
- Test and interview methodology related directly to position description and identified essential elements.

7. Describe steps to ensure that no pre-employment inquiries are made as to whether ran applicant is a disabled person or as to the nature or severity of a disability. (Inquiries related to one's ability to perform the essential functions of a job effectively and safely are permitted.)

- Application contains no pre-offer inquiries.
- All interrogatories approved by Human Resources EEO officer.
- All interrogatories related specifically to essential elements of position description.

8. Does your organization conduct or require any medical exams or physical capacity assessments prior to making final offers of employment? 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. Pre-employment medical examination before conditional job offers are not permitted.

No

Yes

9. 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. You are allowed to inquire about the candidate's ability to perform job functions. Ensure that applicants are not asked about their relationship or association with a disabled individual.

Such review is conducted by Human Resources EEO officer prior to interview by hiring authority; however, some job openings have the requirement of the existence of a disability as a qualification of the job.

10. Review the essential and marginal functions of existing positions descriptions for each position in your organization for use in determining what makes applicants “qualified” and what job accommodations can be made when necessary for an applicant or employee.

Each position description is based on job analysis, which identifies essential and nonessential functions of the position. Requests for accommodation are reviewed on an individual basis with determinations made based on cost and the facility’s ability to provide the requested accommodation.

11. Describe the process used to determine the essential and marginal tasks of positions descriptions in your organization and the process for ensuring that position descriptions are kept current.

Each job posting requires a review by the hiring authority. New positions require job analysis. Positions are updated as functions are modified or changed.

M. Communications

Provision of Auxiliary Aids

1. 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, brailled or large-print materials, or closed-captioned video programs.

Readers, Interpreters, Phone access for vision impaired, Written materials, Specialized communication devices, Telephone services for people with hearing impairments

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

No

Yes

3. Does the public entity provide services or information to the general public over the telephone? If yes, is a telecommunication device for the deaf (TDD) or other equally effective system available so that public entities can communicate with hearing-impaired and speech-impaired individuals? If no, list steps to ensure effective communications with hearing-impaired and speech-impaired individuals. This can include providing a TDD or relying on a third-party relay service. Note: The Justice

Department encourages entities that have extensive phone contact with the public to have TDDs to assure more immediate access.

No

Yes

The Center utilizes the TDD services available in addition to interpreters with Lubbock/Amarillo Deaf. Texas Panhandle Centers has access to a web site, which will provide list of services, sites and accessibility information.

4. Information and Signage: Is information provided concerning the following? Signage should comply with 4.30 of the Texas Accessibility Standards and the ADA Accessibility Guidelines.

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

No

Yes

All sites have been reviewed for accessibility signage and individual site plans have been implemented to post accessibility signage. Texas Panhandle Centers will continue to use the A.D.A. inspection tool on a yearly basis to ensure signage remains posted.

- **Signage directing people to elevators and stairways.**

No

Yes

All sites have been reviewed for accessibility signage and individual site plans have been implemented to post accessibility signage. Texas Panhandle Centers will continue to use the A.D.A. inspection tool on a yearly basis to ensure signage remains posted.

- **Signage concerning the availability and location of TDD equipped pay phones or portable TDD's.**

No

Yes

Texas Panhandle Centers has posted Information Brochures providing user information about Lubbock/Amarillo Deaf services. Also, we have completed an Employee awareness training to address needs of hearing-impaired persons.

N. Transition Plan

All facilities are evaluated at least annually, or more often when needed. The ADA Self-Evaluation and Transition Plan is reviewed annually. Anything that is found to be out of compliance with ADA standards is addressed immediately, and the ADA Plan is updated to reflect any changes made.