

# SELF-EVALUATION FOR COMPLIANCE WITH SECTION 504 FEDERALLY CONDUCTED PROGRAMS

## I. Introduction

The U.S. Department of Housing and Urban Development (HUD) is in the process of evaluating its own activities for compliance with the 1978 amendments to Section 504, which extend coverage to any program or activity conducted by an Executive Agency. What follows is a self-evaluation tool that HUD staff may use to determine their current level of compliance as well as identify areas of potential non-compliance which need to be addressed.

A. Office/Program to be evaluated.

Name: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

B. Individual completing evaluation.

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

C. Handicapped individual(s) assisting in the completion of the self evaluation.

Name(s): \_\_\_\_\_

Title: \_\_\_\_\_

Organization: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

**II. Administrative Practices**

A. Staff information:

List steps to be taken to ensure that all staff involved in any aspect of this program (e.g., recruitment, admission, testing, public information, the conduct of the program, the provision of any services or benefits, etc.) will be informed periodically of, and understand fully, your policy of nondiscrimination on the basis of handicap.

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B. Contracts, agreements and subgrants (e.g., housing management agencies, hotels, subgrantees, educational institutions, public meeting facilities, computer services, printing services, etc.)

1. Are entities with whom you hold contract, agreements, and/or subgrants aware of your policy of nondiscrimination on the basis of handicap?

No \_\_\_\_\_

Yes \_\_\_\_\_ How \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

If yes, attach a list of these entities, and the type of service(s) performed, to this form.

2. Do you require these entities to sign an “assurance of compliance?”
3. Have these entities been required to complete a self-evaluation of the programs and activities they conduct for you?

No \_\_\_\_\_ Yes \_\_\_\_\_

III. Recruitment, Advertisement and Public Information

A. Do you engage in any of the following kinds of activities to recruit program participants or otherwise inform persons about the services provided?

	<u>Yes</u>	<u>No</u>
• Oral presentations/orientations	___	___
• Printed recruitment materials	___	___
• Printed informational materials	___	___
• Advertisements (radio, newspaper, etc.)	___	___

B. Do all materials and advertisements include a notice that you do not discriminate against persons with handicaps?

No \_\_\_ Yes \_\_\_

C. Is the general public notified of the existence and location of services, activities and facilities that are accessible to persons with handicaps?

No \_\_\_

Yes \_\_\_ How \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

D. If "outside" persons or organizations are involved in your recruitment, advertisement or information efforts, are they informed of your nondiscrimination policy?

No \_\_\_

Yes \_\_\_ How \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

E. Do all public information materials “pass” the Printed Program Announcements Checklist (see Attachment 1). If not, list steps which need to be taken to ensure that all materials are modified accordingly:

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F. Are public information materials usable by persons with different kinds of disabilities? Are they being sent to or otherwise reaching persons with varying disabilities? In completing this section, use the Information Dissemination Checklist (see Attachment 2). List below the kinds of materials which are not accessible, the population they are not accessible to, and the steps needed to make them accessible.

Media Type	Target Population	Problem/Solution
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

G. Are articles on the accomplishments of participants with handicaps publicized in the agency’s publication?

No\_\_\_\_\_

Yes\_\_\_\_\_ How\_\_\_\_\_

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H. Are organizations representing persons with handicaps contacted for advice, technical assistance and referrals?

No\_\_\_\_\_

Yes\_\_\_\_\_ How\_\_\_\_\_

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**IV. Program Accessibility**

A. Are inquiries made regarding handicapped status in order to make accommodations for persons with handicaps?

No \_\_\_\_\_ Yes \_\_\_\_\_

B. Is the information requested voluntarily, not used to affect any handicapped person adversely, and kept confidential?

No \_\_\_\_\_ Yes \_\_\_\_\_

C. Is there an orientation program for new participants?

No \_\_\_\_\_ Yes \_\_\_\_\_

D. Have steps been taken to ensure that persons with visual and hearing impairments can understand the information, communicate with the staff and use the written materials provided during the orientation?

No \_\_\_\_\_

Yes \_\_\_\_\_ Describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

E. List the specific activities that comprise your program: (e.g., orientation, intake, classroom training, meetings to provide information on HUD programs to the public, such as meetings to accept bids, etc.).

_____	_____
_____	_____
_____	_____
_____	_____

F. For each activity listed above, list those that are, or have the potential to be, inaccessible to persons with handicaps.

Activity	Reason
_____	_____
_____	_____
_____	_____
_____	_____

- G. Describe steps to be taken to attain accessibility of those activities identified in "F" above, e.g., provision of auxiliary aids, use of alternative materials, special tools or equipment, modification of equipment, renovation of facility, moving program to another facility, etc.

Activity	Reason
_____	_____
_____	_____
_____	_____
_____	_____

- H. Has a method been implemented for soliciting voluntary indications of handicapped status and requests for accommodations, i.e., channels for a handicapped person to bring his or her handicap to the attention of management?

No \_\_\_\_\_

Yes \_\_\_\_\_ Describe: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

- I. From the following list of possible reasonable accommodations, check those which you would be willing to make for handicapped program participants:

- Modifying written materials \_\_\_\_\_
- Modifying meeting rooms \_\_\_\_\_
- Making facilities accessible \_\_\_\_\_
- Adjusting work schedule \_\_\_\_\_
- Providing assistive devices \_\_\_\_\_
- Providing readers and interpreters \_\_\_\_\_
- Adopting flexible policies \_\_\_\_\_
- Reassigning and retraining participants \_\_\_\_\_
- Eliminating transportation barriers \_\_\_\_\_
- Others, depending on the person's particular handicap \_\_\_\_\_

**V. Facilities**

- A. List all facilities, or portions of facilities, used to conduct your program.

Facility	Address
_____	_____
_____	_____
_____	_____
_____	_____

- B. The Architectural Barriers Act of 1968 U42 U.S.C. 3151-4157 covers buildings owned, leased, or financed in whole or in part by or on behalf of the Federal Government. This means that all of HUD’s Regional and Field Offices must comply with the Architectural Barrier Act. The applicable standard is the Uniform Federal Accessibility Standard (UFAS), (24 CFR Part 40). Buildings which are not HUD’s own buildings, but which are being contemplated for use for a public meeting or training, etc., must be fully accessible but would not necessarily have to conform to the UFAS. Therefore, use the following method when evaluating facilities:

1. HUD owned/leased, or financed for use by HUD:

Note: It is recommended that the Office of Administration in the Region and the Administrative Officer in the Field survey the common areas of HUD Field and Regional Offices. Each Program Office should survey the areas assigned for its use.

Do the survey on site using the Site Accessibility Checklist (see Attachment 3). Complete the survey. If any single item on the checklist results in a “no” answer, the facility will need to be further surveyed to see in the facility conforms with the UFAS. The appropriate office within the Regional or Field Office should then contact the General Services Administration (GSA) to request that such a survey be done and that any resulting deficiencies be corrected (by GSA). This same Regional or Field Office will follow-up with GSA to be sure all deficiencies are corrected.

2. Facility planned for use by HUD (such as, for training, conferences, public meetings, etc.).

Go on-site and complete the Site Accessibility Checklist (Attachment 3) and the Meeting Logistics Checklist (Attachment 4). Once the survey is completed, if there is any “no” answers, meet with the responsible official at the facility to determine if

these deficiencies can be corrected. If yes, have the corrections made before using (contracting with) the facility. If no, the facility would then be unacceptable and an alternative facility would have to be identified, surveyed, and so forth until a satisfactory facility is found.

- C. Identify the person or agency who will be responsible for developing and implementing a corrective action plan for the elimination of the barriers identified in "B" (1 and 2) above: (Note: For facilities described in B2, the responsible Official is the person negotiating use of the facility, and if the facility can't or won't correct deficiencies, this person is responsible for securing alternate, acceptable facilities.)

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**VI. Employment Practices**

	<b>Yes</b>	<b>No</b>	<b>N/A</b>
A. <u>Recruitment</u>			
1. Are disable employees in promotional and recruitment advertising?	_____	_____	_____
2. Are contacts maintained with educational institutions which train persons with handicaps?	_____	_____	_____
3. Are organizations which represent persons with handicaps contacted for advice, technical assistance and referrals?	_____	_____	_____
4. Does all recruitment literature indicate that the program does not discriminate on the basis of handicap?	_____	_____	_____

Yes   No   N/A

B.   Job Vacancies

1. Are all vacancy announcements reviewed to ensure that physical, mental and communication requirements are job related and accurately reflect job functions?

\_\_\_\_\_

2. Are managers willing to consider reasonable accommodations for the handicaps of otherwise qualified applicants?

\_\_\_\_\_

**PRINTED PROGRAM ANNOUNCEMENTS CHECKLIST**

Location

OK

- Are posters placed in physically accessible locations? \_\_\_\_\_
- Can small print of posted announcements be read from a wheelchair? \_\_\_\_\_
- Can copies of written materials be reasonably obtained by individuals with disabilities? \_\_\_\_\_
- Have disability groups been included in the dissemination process? \_\_\_\_\_

Printing

- Are all words clearly legible? \_\_\_\_\_
- Would color blind individuals be able to distinguish all content? \_\_\_\_\_

Graphics

- Are representations of disabled individuals free of patronizing stereotypes? \_\_\_\_\_
- Do graphics permit easy reading of content? \_\_\_\_\_

Content

- Is all necessary program information included? \_\_\_\_\_
- Are procedures for providing program access to disabled individuals stated clearly? \_\_\_\_\_
- Are the 504 contact person's name, address and phone number listed? \_\_\_\_\_