

CITY OF WEAVER

Exhibit V-4

Sept. 2015

**SECTION 504
SELF-EVALUATION/TRANSITION PLAN GUIDE**

**Alabama Department of Economic
And Community Affairs
CDBG Program**

INTRODUCTION

Section 504 of the Rehabilitation Act of 1973 provides that no qualified handicapped person shall, on the basis of handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. As such, all recipients of CDBG funds from ADECA or the U.S. Department of Housing and Urban Development must be in compliance with Section 504 and its implementing regulations found in 24 CFR, Part 8.

HUD Section 504 regulations require that all CDBG grantees complete a self-evaluation of their current policies and practices to determine whether, in whole or in part, they do not or may not meet the requirements of the Act. Furthermore, if the self-evaluation determines that structural changes to local government facilities are necessary to achieve program accessibility, the recipient must develop a transition plan setting forth the corrective actions that will be needed to come under compliance.

The purpose of this Self-Evaluation/Transition Plan Guide is to assist CDBG grantees in evaluating their programs and activities to determine whether they conform to the requirements of Section 504 and the regulations found in 24 CFR, Part 8. This guide only provides an example or model to go by, and recipients are free to use this guide or any other comparable approach to developing a self-evaluation and transition plan.

SELF-EVALUATION CHECKLIST

All recipients of CDBG funds must:

1. evaluate their current policies and practices to determine if they meet Section 504 requirements;
2. modify any policies and practices that do not meet these requirements; and
3. take appropriate corrective steps to remedy the discrimination revealed by the self-evaluation.

It should be noted that the self-evaluation must be developed with the consultation of interested persons, including individuals with handicaps, or organizations representing individuals with handicaps. These individuals or groups must be identified, and grantees with fifteen (15) or more employees must also maintain this information on file for public inspection for a period of three years after completion.

INSTRUCTIONS: Grantees should analyze their policies, practices, activities, physical facilities, etc. in relation to the Section 504 requirements listed in Column A. If the recipient government is in compliance with a particular requirement, indicate this in Column B. If the local government is not in compliance, mark Column C and explain why in Column E. In Column F describe what corrective measures will be taken to alleviate any deficiency identified, unless to do so would clearly result in an undue administrative or financial burden. In addition, if a particular requirement does not apply to the grantee, mark Column D and explain why it is not applicable in the comments section in Column B.

PART I: GENERAL REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE		COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C) (D)		
1. Grantees with 15 or more employees must designate a Section 504 Coordinator (give name/title in comments section).	✓		Teresa Dishman City Clerk	
2. Grantees with 15 or more employees must establish a grievance procedure that provides for the prompt and equitable resolution of complaints alleging violations of Section 504 requirements.	✓		Personnel Policies May 23, 1984 Grievance Procedure May 23, 1984	
3. Grantees with a workforce of 15 or more persons must give employees, beneficiaries, and the general public initial and continuing notice of non-discrimination on the basis of handicap using some or all of the following methods:				

SECTION 504 REQUIREMENT	COMPLIANCE		PART I: GENERAL REQUIREMENTS COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C) N/A (D)		
a. post notices	✓			
b. newspaper ads	✓			
c. taped announcements		✓		
d. employee memoranda		✓		
e. distribution of Braille materials				✓
4. All recipients must consult with handicap persons/organizations in the development of the self-evaluation (list individuals/groups consulted in comments section).			Nutrition/Senior Citizens Center Anna Warren, Center Manager	

SECTION 504 REQUIREMENT	COMPLIANCE			PART I: GENERAL REQUIREMENTS		MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES	NO	N/A	COMMENTS/DEFICIENCIES IDENTIFIED		
	(B)	(C)	(D)			
<p>a. Grantee with 15 or more employees must maintain on file the self-evaluation for a period of three years after its completion.</p> <p>b.</p>	✓					
<p>b. All recipients must develop a written transition plan outlining steps to be taken to eliminate all physical impediments to handicapped accessibility found in local government buildings/facilities, including a schedule for correcting each deficiency and the designation of the person(s) responsible for implementation.</p> <p>c.</p>	✓					

SECTION 504 REQUIREMENT	PART I: GENERAL REQUIREMENTS			MODIFICATIONS NEEDED/REMEDIES PLANNED
	COMPLIANCE		COMMENTS/DEFICIENCIES IDENTIFIED	
	YES	NO		
	(B)	(C)	(D)	
5. All grantees must collect and maintain data showing to what extent handicapped individuals are beneficiaries of the CDBG and other Federally financed programs.	✓			
a. applications for assistance	✓			Nutrition Center Meals
b. survey forms	✓			
c. census data			✓	
d. other methods			✓	

PART II: COMMUNICATIONS REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE		COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C) N/A (D)		
<p>1. All grantees must develop an information dissemination process to provide program information to interested handicapped persons in the community.</p> <p>a. develop a mail out list to organizations who serve disabled persons in the community;</p> <p>b. make sure the wording on printed notices, brochures, and other program materials can be clearly read by disabled individuals;</p> <p>c. utilize the services of sign language interpreters at public meetings whenever there is reason to believe deaf persons will be in attendance.</p>	<p>✓</p>		<p>Senior Center Manager maintains mailing list for senior citizens</p>	

PART II: COMMUNICATIONS REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE			COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C)	N/A (D)		
<p>0. All grantees must take steps to ensure effective communication with applicants, beneficiaries, and the general public:</p> <p>0. utilize a telecommunications device for the deaf (TDD) whenever conversing with hearing impaired applicants and beneficiaries over the telephone;</p> <p>0. furnish auxiliary aids (amplifiers, magnifying glasses, Braille materials, etc.) whenever necessary and appropriate for the handicapped to participate in programs and activities paid for with Federal assistance.</p>	✓			As needed	
				As needed	

PART III: EQUAL EMPLOYMENT OPPORTUNITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE		COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C) / N/A (D)		
<p>1. No qualified individual with handicaps shall, solely on the basis of handicap, be subjected to discrimination in employment under any program or activity that receives CDBG or other Federal financial assistance. This prohibition applies to the following employment policies and practices:</p> <p>a. Recruitment</p> <ul style="list-style-type: none"> • Job announcement must contain a nondiscrimination statement with respect to handicap. • Job announcement must be publicized in a manner that will adequately notify qualified disabled individuals in the community of employment opportunities. 	✓		<p>EEO Employer Statement includes handicapped</p> <p>The Anniston Star</p>	

PART III: EQUAL EMPLOYMENT OPPORTUNITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE			COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C)	N/A (D)		
<p>b. Selection</p> <ul style="list-style-type: none"> • Applications and interviews for employment must not make inquiries about an applicant's handicap, unless it can be clearly shown that such questions directly reflect upon the individual's ability to perform job-related functions. • Employment tests must be job-related and not discriminate against persons with impaired communications abilities. • Medical history questionnaires must not request the nature 	✓				

PART III: EQUAL EMPLOYMENT OPPORTUNITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE		COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C) (D)		
<p>* Pre-employment medical exams must be mandatory for all prospective employees, not just those suspected of disabilities, and the results must be kept confidential.</p>	✓			
<p>c. Promotion/Upgrading The criteria for promotion, upgrading, tenure, transfer, etc. must not limit the eligibility of qualified handicapped employees.</p>	✓			
<p>d. Training Training programs must be administered in a manner that will allow equal participation by qualified handicapped employees.</p>	✓			

PART III: EQUAL EMPLOYMENT OPPORTUNITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE		COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C) N/A (D)		
<p>e. Compensation/Fringe Benefits Employees with disabilities must not be offered different rates of pay solely on the basis of handicap.</p>	✓			
<p>f. Termination/Layoff Decisions on layoffs and job terminations must not discriminate against disabled employees.</p>	✓			

PART III: EQUAL EMPLOYMENT OPPORTUNITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE		COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C) / N/A (D)		
<p>2. No grantee may deny an employment opportunity to a qualified handicapped applicant or employee if the basis for denial is the need to make reasonable accommodations to the physical or mental limitations of the applicant or employee. As used here, reasonable accommodation pertains to:</p> <p>a. modification of the workplace (furniture, office equipment, vehicles, etc.) to be readily usable by handicapped employees;</p> <p>b. provision of assistive devices;</p>	✓			

PART III: EQUAL EMPLOYMENT OPPORTUNITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE			COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C)	N/A (D)		
<p>c. job restructuring, modification of work schedules, relocation of work station to more accessible facilities, etc.; and</p>	✓				
<p>d. when none of the above measures are undertaken to accommodate handicapped employees, a determination has been made that to do so would impose an undue financial hardship or administrative burden on the grantee (explain in detail the basis for such a decision in the comments section).</p>	✓				

PART IV: FACILITY ACCESSIBILITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE		COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C) N/A (D)		
<p>c. The grantee's entire inventory of public buildings and other non-housing governmental facilities must be designed, constructed, and/or modified to be readily accessible and usable by handicapped employees, beneficiaries, and the general public unless it can be clearly shown that:</p>				
<p>d. to do so would impose an undue financial or administrative burden;</p>		✓		
<p>e. alteration would result in substantial impairment to significant features of a certified historic property; or</p>		✓		
<p>f. other alternatives are equally effective in achieving compliance with Section 504 accessibility requirements.</p>		✓		

PART IV: FACILITY ACCESSIBILITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE				COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES	NO	N/A			
(B)	(C)	(D)				
2. In determining each public facility's accessibility, the following factors should be analyzed with respect to Uniform Federal Accessibility Standards (UFAS):						
e. Does the facility have designated parking spaces for the handicapped, marked and of adequate width, near building entrances?						
City Hall/Courthouse	✓				Front of building	
Civic Center/Auditorium				✓		Community Center/SC Building will be opened in 2016 and will be handicapped accessible
Library				✓		
Parks/Recreation Facilities	✓					
Other Government Buildings Nutrition Center	✓	✓				

PART IV: FACILITY ACCESSIBILITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE		COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C) (D)		
b. Is the main entrance wheelchair accessible (ramp, handrails, 32" wide doorway, etc.)?	✓			
City Hall/Courthouse	✓		Wheelchair accessible	
Civic Center/Auditorium		✓		Community Center/SC Center will open in 2016 and will be handicapped accessible
Library		✓		
Parks/Recreation Facilities	✓		Park contains paved surfaces and gravel	
Other Government Buildings Nutritional Center	✓			

PART IV: FACILITY ACCESSIBILITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE			COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES	NO	N/A		
(B)	(C)	(D)			
c. Are public restrooms handicapped accessible (wheelchair maneuverable, grab bars, lavatories/toilets at proper height, extended faucet handles, etc.)?	✓				
City Hall/Courthouse	✓				
Civic Center/Auditorium			✓		Community Center/SC Center will open in 2016 and will be handicapped accessible
Library			✓		
Parks/Recreation Facilities	✓				
Other Government Buildings Nutritional Center	✓				

PART IV: FACILITY ACCESSIBILITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE				COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C)	N/A (D)			
d. Are interior doorways and aisles free of obstacles and wide enough to accommodate wheelchairs?						
City Hall/Courthouse	✓					
Civic Center/Auditorium				✓		Community Center/SC Center will be open in 2016 and will be handicapped accessible
Library				✓		
Parks/Recreation Facilities	✓					
Other Government Buildings Nutrition Center	✓					

PART IV: FACILITY ACCESSIBILITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE			COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C)	N/A (D)		
e. Are elevators usable and accessible (sufficient width/depth for wheelchairs, tactile buttons, auditory floor indicators)?			✓	No elevators	
City Hall/Courthouse			✓		
Civic Center/Auditorium			✓		
Library			✓		
Parks/Recreation Facilities			✓		
Other Government Buildings			✓		

PART IV: FACILITY ACCESSIBILITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE		COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C) / N/A (D)		
<p>f. Do drinking fountains and public telephones have the proper height and clearance to be used from a wheelchair?</p>				
<p>City Hall/Courthouse</p>	✓			
<p>Civic Center/Auditorium</p>		✓		Community Center/SC Center will open in 2016 and will be handicapped accessible
<p>Library</p>		✓		
<p>Parks/Recreation Facilities</p>	✓			
<p>Other Government Buildings Nutrition Center</p>	✓			

PART IV: FACILITY ACCESSIBILITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE		COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C) N/A (D)		
<p>g. All federally assisted, multifamily housing projects must be accessible to the handicapped. The agency responsible for the design, construction, renovation, and management/operation of the community's public housing units must also conduct a self-evaluation to determine if Section 504 requirements have been met.</p>		<input checked="" type="checkbox"/>	<p>There are no federally assisted housing units in the City of Weaver.</p>	

PART V: PROGRAM PARTICIPATION REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE			COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C)	N/A (D)		
<p>1. Handicapped individuals must be eligible to participate in any project, program, service or activity financed with CDBG funds. List below all of the recipient's recently completed (last three years) and on-going CDBG projects; and then indicate how each is constructed, and/or administered to meet the needs of disabled persons:</p> <p>a. _____</p> <p>b. _____</p> <p>c. _____</p> <p>d. _____</p>	<input checked="" type="checkbox"/>				

PART V: PROGRAM PARTICIPATION REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE			COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C)	N/A (D)		
<p>2. Handicapped individuals must have access to, or be eligible to participate in, any program, service, or activity of general local government provided by a recipient of CDBG funds or any other Federal financial assistance. As such, the following functions, activities, services, and/or programs must be analyzed to determine their availability or accessibility to disabled persons.</p> <p>a. Public Transportation</p> <ul style="list-style-type: none"> Do all sidewalks have curb ramps for wheelchair accessibility? Are public transportation vehicles (vans, buses, etc.) equipped to provide access to the disabled? 	✓			<p>The City of Weaver participates in the ADA Para-Transit service provided through the East Alabama Regional Planning Commission. The ADA Para-Transit service is an on-demand curb to curb transit service for handicapped and disabled citizens provided during the same hours as the ACTS fixed route service. All ADA Para-Transit vehicles are handicapped accessible with wheel chair lifts.</p> <p>Public transportation is the responsibility of East Alabama. Weaver participates in the paratransit service provided by them.</p>	

PART V: PROGRAM PARTICIPATION REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE		COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C) N/A (D)		
<p>b. Recreation/Cultural Activities</p> <p>Are specialized, alternative recreation programs/facilities provided for the enjoyment of elderly, disabled or handicapped individuals?</p>	✓		<p>Nutrition center provides activities for disabled Senior Citizens</p>	
<p>Does the public library provide alternative methods (Braille, taped recordings, etc.) for the blind to have access to reading material?</p>	✓		<p>The Anniston/Calhoun County Library provides services for the visually impaired.</p>	
<p>Are hearing impaired individuals provided auxiliary listening devices for public assemblies, meetings, and performances?</p>	✓		<p>The City obtains these services as necessary or requested for public meetings. For recreational purposes, the Library has an Access program that performs this service.</p>	

PART V: PROGRAM PARTICIPATION REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE		COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C) (D)		
c. voting				
Are polling places physically accessible to disabled persons?	✓			
Do election officials make voting convenient for the handicapped, including the blind?	✓			
d. Senior Citizen Programs				
Are transportation services for the handicapped provided to elderly recreation/day care programs?	✓			
Is home delivery an option for elderly nutrition programs?	✓			
SECTION 504 REQUIREMENT	COMPLIANCE		COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES (B)	NO (C) (D)		

COMPLIANCE

YES NO N/A

0. Legal/Administrative

Do insurance or medical eligibility requirements limit the participation of handicapped individuals in local government programs or activities:

✓

f. Do any other administrative policies or procedures prevent disabled individuals from participating in programs, services, or activities provided by the grantee?

✓

Other Government Functions/Activities

None

TRANSITION PLAN

When the self-evaluation indicates that public buildings or other non-housing facilities fail to meet Section 504 program accessibility standards, then the grantee must develop a transition plan setting forth the steps necessary to eliminate all instances of noncompliance. In formulating the plan, one of two strategies should be considered:

1. making structural changes to eliminate physical barriers to handicapped accessibility;
or
2. making nonstructural changes in the program or activity conducted in each facility in order to avoid the effects of physical barriers.

As in the case of the self-evaluation, the transition plan must be developed with the assistance of interested disabled persons and/or organizations representing individuals with handicaps. Also, a copy of the plan must be made available for public inspection.

INSTRUCTIONS: List all physical impediments to handicapped accessibility identified in the self-evaluation (Part IV, Columns C, E, and F). Then indicate in detail the corrective measures that will be undertaken to alleviate each deficiency noted, along with the estimated cost and time frame for achieving compliance. In addition, identify the local government official who will be responsible for implementing each change.

TRANSITION PLAN

IDENTIFICATION OF PHYSICAL	MODIFICATIONS/CORRECTIVE	EST. COST	SCHEDULE FOR COMPLIANCE		RESPONSIBLE
			BEGIN	COMPLETE	
None identified	N/A	N/A	N/A	N/A	N/A

*Refer to Evaluation, Part IV, Columns (C), (E), and (F).

**INDIVIDUALS/ORGANIZATIONS ASSISTING IN THE FORMULATION
OF THE SELF-EVALUATION AND TRANSITION PLAN**

Pursuant to the Section 504 requirements contained in 24 CFR, Subpart C, Section 8.21 and Subpart D, Section 8.52; the following disabled person(s) and/or organization(s) representing handicapped individuals assisted in the formulation of this self-evaluation and transition plan:

<u>Person Consulted</u>	<u>Organization</u>	<u>Address</u>
Anna Warren	Weaver Senior Center	406 Anniston Street

Indicate below the relevant education, work experience, special expertise, etc. which makes the person(s) and/or organization(s) named above qualified to assist in the formulation of the self-evaluation and transition plan:

Ms. Warren works with disabled Senior Citizens daily in her capacity as Senior Center Manager.

I certify that this self-evaluation and transition plan was completed in full compliance with the Section 504 requirements contained in 24 CFR, Part 8.



Chief Election Official

09-24-2015

Date

City of Weaver

Americans with Disabilities Act Discrimination Complaint Form

Please complete this form and return it to the City of Weaver. You may include additional sheets if attachments are necessary.

Person filling out this form

Last Name	First Name	Middle	Suffix
Address	City	State	ZIP
Telephone Number		Email	

Person(s) Discriminated Against (if other than the complainant)

Last Name	First Name	Middle	Suffix
Address	City	State	ZIP
Telephone Number		Email	

Discriminatory incident

Government, organization, institution or business which you believe has discriminated

Name	Telephone Number		
Address	City	State	ZIP

When did the discrimination occur?

Date: ____/____/____

Primary type of disability (check all that apply):

- | | |
|---|--|
| <input type="checkbox"/> Mobility | <input type="checkbox"/> Seizure |
| <input type="checkbox"/> Cognitive/Intellectual/Developmental | <input type="checkbox"/> Speech |
| <input type="checkbox"/> Learning | <input type="checkbox"/> HIV/AIDS |
| <input type="checkbox"/> Mental/Psychiatric | <input type="checkbox"/> Diabetes |
| <input type="checkbox"/> Vision | <input type="checkbox"/> Other or Not Listed _____ |
| <input type="checkbox"/> Hearing | |

Issue (check all that apply):

- | | |
|--|---|
| <input type="checkbox"/> Employment | <input type="checkbox"/> Housing |
| <input type="checkbox"/> Physical Access | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Interpreter/Assistive Listening | <input type="checkbox"/> Denial of Service/Refusal to Admit |
| <input type="checkbox"/> Service Animal | <input type="checkbox"/> Other or Don't Know _____ |

