

YOU GOTTA HAVE A PLAN: Self-evaluations and transition plans

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Basic requirements: title II (DOJ)

- Regulation requires a self-evaluation of services, policies and practices,
 - with public input
 - By January 26, 1993. 28 CFR 35.105(a)
- Regulation requires a transition plan, where physical changes are necessary to achieve program accessibility,
 - with public input,
 - (if 50 or more employees)
 - by July 26, 1992. 28 CFR 35.150(d)

Other procedural requirements

- ▶ Physical modifications to be complete by January 26, 1995. 28 CFR 35.150(c)
- ▶ Designation of responsible official (“ADA Coordinator”) (if 50 or more employees). 28 CFR 35.107(a)
- ▶ Grievance procedure (if 50 or more employees). 28 CFR 35.107(b)
- ▶ Notice to public. 28 CFR 35.106

Section 504

Agency regulations require a self-evaluation and (if necessary) a transition plan

Transition plan must include

- Description of physical obstacles affecting accessibility that must be removed
- Methods for making facilities accessible (in detail)
- Time frames (if more than one year, annual markers)
- Name of person responsible for implementation

Why do a plan now?

Ask yourself:

- Has anything changed in 20 years?
 - Times and people
 - Your programs
 - Your buildings and facilities
 - Web sites
- Are you ready for more change?
- Can you comply without a plan?

Is it better not to assess the problems?



Or is it better to acknowledge issues and fix them?

Guiding your institution

Start effort to budget time and money for compliance

Benefits of planning

- Good faith
- You'll be positioned for new requirements
- Possibility of harsher mandates from litigation

Transition plan: two approaches

- Follow each program or
- Assess the facilities and how they're used, then document where accessible programs can be offered

What kind of plan?

- Do what works for you
- Various options/models
- Identify it as your transition plan or barrier removal plan
- Look at how policies affect access
- Consider contractors, vendors, etc.

How do you develop a plan?

- Involve everyone
 - Those responsible
 - Those affected
- Keep possible regulatory changes in mind
- Develop databases
- Establish priorities and limits
- Get public comment
- Put it on the web

Then what?

- Empower someone
- Strong grievance procedure
- Up-to-date data bases
- Train
- Monitor
- Respond to issues quickly
- Document your responses
- Check plans and construction
- Publicize successes and best practices
- Monitor
- Retrain



QUESTIONS?

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