[Note: this template contains some general instructions intended as guidance for ADA/504 Self-Evaluations *for purposes of DHCD’s Accessible Unit Initiative*. This outline is based on the ADA/504 Self-Evaluation and Transition Plan Guide for local housing authorities, available at <https://www.mass.gov/files/documents/2016/07/wj/ada-504.pdf>. The outline and the Guide should not be viewed as substitutes for understanding and complying with all applicable federal and state requirements, and the document produced from this outline is not a substitute for a full ADA/504 Self-evaluation plan performed by a consultant.

For further information about federal requirements, see 28 CFR part 35 (ADA Title II regulations) and 24 CFR part 8 (Section 504 of the Rehabilitation Act regulations). The ADA Title II regulations, Title II Technical Assistance Manual, and other ADA related guidance can also be found at <https://www.ada.gov/>. Note also that the 2010 ADA Standards for Accessible Design (available at <https://www.ada.gov/2010ADAstandards_index.htm>) were issued in 2010 subsequent to the Guide. Additionally, the Guide does not address the accessibility standards required under the Massachusetts Architectural Access Board regulations at 521 CMR.]

**Housing Authority Summary**

Briefly delineate mission, history, and programs. This information should include (at minimum)

* # of developments and units by program
* Federal vs. State programs
* Vouchers
* # of employees and # of residents served

**Current Accessibility Conditions**

Summarize current accessibility conditions, highlighting current barriers to access. You can draw heavily on the “Accessibility” tab of CPS, which includes detailed information from the 2015 Facility Condition Assessment on accessible units, accessibility of common space, and barriers due to site geography. The information in CPS should in large part be sufficient to complete this section for purposes of DHCD’s Accessible Unit Initiative. If you have added units or made accessibility improvements since 2015, be sure to include them. This section should include, at a minimum

* #of accessible units by program and unit size/# of bedrooms
* # of accessible units needed to reach 5% accessibility by program
* Current demand for accessible units
* Identify barriers to unit accessibility by unit/unit type (see, e.g., the DHCD Facility Condition Assessment Form spreadsheet for notes on evaluating unit level components that impact accessibility).
* Accessibility of common areas (barriers to accessibility of common areas may be identified through the Facility Condition Assessment, Site & Interior Common Area Accessibility Assessment in CPS).
* Site accessibility (barriers to site accessibility may be identified through the Facility Condition Assessment, Site & Interior Common Area Accessibility Assessment in CPS).
* Other major barriers to accessibility, including building type, cost, etc.

**General Requirements**

* Identify person overseeing Section ADA/504 compliance efforts
* Grievance procedures for discrimination complaints. If procedure does not exist, plan to create one.[[1]](#footnote-1)
* Notifications to residents and applicants that LHA does not discriminate based on disability.

**Effective Communication, Outreach and Public Contact**

* Accessibility of website information, and/or plan to improve
* Presence of text telephone, or plan to procure one
* Accessibility of printed materials, or plan to improve
* Provisions for readers for individuals with visual impairments, or plan to create
* Provisions for interpreters or other alternative communication measures, as appropriate, for individuals with hearing impairments

**Reasonable Accommodations and Modifications**

* Delineate established reasonable accommodation procedures and policies consistent with 760 CMR 4.02 (1)(e) and DHCD guidance, including DHCD PHN 2009-11 and PHN 2011-13. Such procedures must include notice to applicants and residents.[[2]](#footnote-2) If they don’t exist, show plan to create them.

**New Construction and Alterations**

* Briefly describe how authority will ensure that new construction and alterations will comply with all applicable state and federal accessibility requirements.

**Existing facilities**

Describe authority’s strategy and prioritization for improving accessibility of portfolio for housing units and common areas. This should be informed from analysis of current accessibility conditions and drawing on CPS. The strategy includes:

* Prioritizing accessibility improvements for housing units and justifying the prioritization, taking into account ease of conversion, funding, demand, and program access considerations (such as unit type, location, and bedroom distribution) to maximize equal access for persons with disabilities.
* Outlining the steps that will be taken to achieve housing unit accessibility (i.e., accessibility for at least 5% of housing units), in order of prioritization.
* Outlining the steps that will be taken to achieve common area and site accessibility, in order of prioritization.
* Outlining how accessibility considerations will be incorporated into future modernization projects.
* *Note – all of these plans are subject to funding availability.*

**Non-Housing Program**

Describe the housing authority’s plan for ensuring that non-housing programs, services, and activities are operated in a manner that ensures non-discrimination and equal access for persons with disabilities, including with respect to non-housing services, accessibility of locations where meetings open to residents and/or the public are held, emergency planning/procedures, and employment policies and practices.

1. Such procedures must include notice of the grievance process for tenants in accordance with 760 CMR 6.03 & 6.08, as well as the obligation to notify tenants of their right to file a discrimination complaint with the Massachusetts Commission Against Discrimination in accordance with 760 CMR 4.02(1)(d). [↑](#footnote-ref-1)
2. See “Notice to All Applicants and Residents: Reasonable Accommodations and Modifications are Available to All Applicants and Residents with Physical and/or Mental Disabilities,” available at https://www.mass.gov/guides/how-to-apply-for-public-housing. [↑](#footnote-ref-2)