



SMCCCD - Skyline College

Appendix C: Self-Evaluation

of Policies, Procedures, and Practices

DRAFT



The Americans with Disabilities Act
Self-Evaluation Report for
San Mateo Community College District
Skyline College



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Table of Contents

San Mateo Community College	230
I. PROJECT OVERVIEW	234
A. Acknowledgments	234
B. Introduction	235
C. Background Information Regarding the Americans with Disabilities Act and California State Law	236
1. Purpose of the Americans with Disabilities Act	236
2. Overview of Disability Civil Rights Law Impacting Skyline College	236
3. ADA Self-Evaluation Requirements	237
4. Who is a Qualified Person with a Disability?	237
D. Scope of the Self-Evaluation	238
E. Self-Evaluation Method of Review	239
F. ADA Transition Plan Requirements	239
G. How This Report is Organized & To Be Utilized	240
II. SURVEY RESPONSES AND RECOMMENDATIONS	241
ADA Coordinator	241
Recommended Actions	241
Survey Response Overview	241
Notices & Policies	241
Reasonable Accommodation	242
Grievances	243
Training	243
Human Resources	244
Communications	244
Recommended Actions	244
Survey Response Overview	244
Communications Generally	244
Print Materials	245
Communication with People who are Deaf or Hard of Hearing (HoH)	245
Faculty	246
Recommended Actions	246
Survey Response Overview	246
Information Technology & Digital Communication	247
Recommended Actions	247
Survey Response Overview	247

Law Enforcement	248
Recommended Actions	248
Survey Response Overview	248
Library Services	249
Recommended Actions	249
Survey Response Overviews	250
Meetings & Events	253
Recommended Actions	253
Survey Response Overview	253
Events Generally	253
Exhibits	254
Physical Education	255
Recommended Actions	255
Survey Response Overview	255
Purchasing & Service Contracts	256
Recommended Actions	256
Survey Response Overview	256
Student & Community Services	256
Recommended Actions	256
Survey Response Overview	257
Disability Resource Center	257
Medical Services	258
Recommended Actions	258
Survey Response Overview	258
Emergencies & Evacuation Procedures	259
Recommended Actions	259
Survey Response Overview	259
Construction	261
Recommended Actions	261
Survey Response Overview	261
Vetting of Self-Evaluation Results	262
Staff Who Contributed to this ADA Self-Evaluation	263
Work Plan for the Self-Evaluation Implementation	264
Appendices	264
Appendix A	264
Appendix B	266
Appendix C	267
Appendix D	276
Appendix E	278
Appendix F	279

Appendix G	279
Appendix H	279
ADA Coordinator	280
Communications	281
Electronic Communication	282
Law Enforcement	294
Library Services Program Survey	297
Meeting and Event Planners	299
Physical Education	303
Purchasing and Service Contracts	304
Student/Community Services	308
Medical Services	310
Emergencies and Office Sites	312

I. PROJECT OVERVIEW

A. Acknowledgments

Sally Swanson Architects, Inc. (SSA) would like to thank the Skyline College (Skyline College) staff for their time, thoughtfulness, and conscientious contributions to this Self-Evaluation process. The Self-Evaluation process is more than simply responding to questions, it's an opportunity to immerse, reflect, grow, and demonstrate an unwavering commitment to making Skyline College the best it can be for all who come here. The level of commitment exhibited by College staff throughout this Self-Evaluation process attests to the College's dedication to equal access for all.

SSA would especially like to thank Heidi Rank, Architect and Project Manager for this Self-Evaluation. Without her leadership, and everyone's contribution, this project and the milestones of equality that will follow would not have been possible.

B. Introduction

Because of its history and mission of community service, Skyline College is particularly committed to providing seamless access to all its programs, services and activities for qualified people with disabilities. Skyline College is not only dedicated to ensuring compliance with State and Federal disability rights laws, it aspires to be a model of best practices in the areas of accessibility and reasonable accommodation.

The Americans with Disabilities Act (ADA) Title II mandates that covered entities, such as Skyline College, conduct a Self-Evaluation, create a Transition Plan, appoint an ADA Coordinator, and develop a Grievance Procedure and an ADA Notice of Compliance. To meet this obligation, and to create a path forward toward total accessibility, Skyline College has contracted with Sally Swanson Architects, Inc. (SSA) to assist with meeting (ADA) Title II mandates.

This document presents only the ADA Self-Evaluation. This evaluation provides a comprehensive report outlining a review of Skyline College programs, services and activities. Results of the survey and analysis identify programmatic and administrative barriers to programs and are contained herein along with the Grievance Procedure and ADA Notice of Compliance.

C. Background Information Regarding the Americans with Disabilities Act and California State Law

1. Purpose of the Americans with Disabilities Act

Passed in 1990, the Americans with Disabilities Act (ADA) is one of the most comprehensive civil rights laws in the nation. It provides protection to an estimated 57 million Americans in: employment (Title I); receipt of programs, services and activities from State and local government (Title II); the receipt of goods and services from private businesses (Title III); and telecommunications (Title IV). In 2008, the Americans with Disabilities Amendment Act (ADAAA) was passed. The ADAAA gives guidance to the courts regarding who has standing under ADA. The result has been an increasing number of people who are now able to bring ADA claims in Federal Court.

2. Overview of Disability Civil Rights Law Impacting Skyline College

Skyline College is covered by the ADA Title II, ADAAA of 2008, the Rehabilitation Act of 1973, and California Government Codes 11135 and 12926. All contractual activities are also covered by California Government Code 4450. Employment programs are covered by the ADA (Title I), the ADAAA and California Government Code 12926. Construction activities are covered by California Code 4450.

When comparing State and Federal law 28 CFR 35.103, it is mandated that the most stringent law be applied to create the maximum amount of access for people with disabilities. Thus, the most stringent standards were applied to the evaluation reported in this document.

3. ADA Self-Evaluation Requirements

Required by 28 CFR 35.105, the ADA Self-Evaluation is a complete examination of all programs, services and activities provided by Skyline College, to ensure that, when viewed in their entirety, they are readily accessible to qualified people with disabilities. The purpose of the ADA Self-Evaluation is to identify areas where changes are needed to ensure access is in place for people with disabilities.

4. Who is a Qualified Person with a Disability?

To be qualified as a person with disabilities for the purposes of this Self-Evaluation, an individual must have a disability as defined below and must be qualified to participate in the programs, services or activities of Skyline College.

Under California Government Code 11135, the ADA was incorporated into State law and therefore the ADA issues raised in this Report are both State and Federal issues. In California Government Code 12926, the definition of mental and physical disability was broadened beyond the ADA. Summarized as follows:

1. A person having a physical or mental disability that limits a major life activity. This person is considered as having unmitigated status (i.e., how the individual in question would function without the use of medication or devices that may mitigate the impact of the disability). If there is a limitation to a major life activity in this statute, coverage is established;

ADA Self-Evaluation Report for: Skyline College

2. A person with a history of a disability as described above;
3. A person is regarded as having a disability, such as described.

California State law also provides protection to cancer survivors, people who have a genetic predisposition to illnesses or disabilities or people who have received services within a special education program.

D. Scope of the Self-Evaluation

The Self-Evaluation is intended as a review of the programs, services and activities provided by Skyline College. The US Department of Justice (DOJ) within the ADA Title II, Technical Assistance Manual (TAM) (Section II-8.2000) recommends a scope of review for Self-Evaluations, which contains thirteen program areas which were considered for use in the development of this report. Areas considered include:

- The Transition Plan (physical access to existing College facilities),
- Policies that may limit or exclude the participation of people with disabilities;
- Communication systems used by Skyline College;
- Provision of auxiliary aids and services to people who are engaged in Skyline College's programs, services or activities;
- Access to emergency management for people with disabilities;
- Disability awareness among Skyline College staff;
- Policies addressing policy modification requests and the determination of fundamental alteration of programs;
- Access to public meetings;
- Human Resources programs and policies;
- Construction policies;
- College staff training and support;

ADA Self-Evaluation Report for: Skyline College

- ❑ ADA-related drug policies.

E. Self-Evaluation Method of Review

The ADA mandates that a Self-Evaluation review all programs, services and activities of the covered entity. The Self-Evaluation of Skyline College's programs, services, and activities required and involved the participation of every College department. Various teams were assigned relevant surveys based on their programs, services and activities. Departments were instructed to complete a survey for different divisions if they were sufficiently separate and unique. Copies of survey questions are included in the Appendix to this report, and completed surveys are available upon request.

F. ADA Transition Plan Requirements

The ADA Transition Plan is required by 28 CFR 35.150 (d). An ADA Transition Plan must include the following components:

1. A list of all physical barriers in sites at which Skyline College provides programs, services or activities;
2. A statement regarding the method to be used to mitigate the barriers;
3. A schedule for barrier mitigation;
4. The name of the official who is responsible for the ADA Transition Plan administration.

The ADA Transition Plan will be contained in a separate report.

G. How This Report is Organized & To Be Utilized

As noted above, Skyline College is committed not only to compliance with federal and state laws regarding disability and access, but strives to be a model of accessibility and reasonable accommodations best practices. Accordingly, this Report is organized according to survey responses.

This Report is intended to be a summary – not full recitation – of survey results. Each section begins with an overview of recommendations and segues into a breakdown of survey summaries providing the basis for those recommendations. College Staff-provided recommendations are also indicated, and other lists, such as lists of available accessibility resources, are generally indicated as well.

By organizing it this way, the College can easily access the information it needs and use this Report to sharpen its focus on providing the best possible service to its constituents with disabilities, and become a model of best practices.

II. SURVEY RESPONSES AND RECOMMENDATIONS

ADA Coordinator

Recommended Actions

Policies

- Ensure that Skyline has a policy regarding: the use of motorized mobility devices on campus; non-discrimination against persons who formerly used illegal drugs; and placement of furniture to ensure built environment accessibility.
- Ensure that Skyline has a policy in place requiring documentation of Program Access solutions.

Reasonable Accommodation

- Develop and implement reasonable accommodations processes for members of the public and volunteers who are involved in and/or avail themselves of Skyline's programs, services or activities.
- Ensure that existing reasonable accommodations procedures for students, faculty, staff and employees contain policies regarding determination of undue burden, and anti-surcharge.

Grievances

- Confirm that the District is responsible for grievances brought against third party service providers.

Survey Response Overview

Notices & Policies

Survey responses indicate that Skyline has a notice of compliance on its website which addresses Federal (but not State) laws. Skyline also has an anti-disability harassment policy that is distributed yearly both online and in its student catalog.

Survey responses indicate it is not clear whether Skyline has a policy regarding the use of motorized mobility devices on campus, non-discrimination against persons who formerly used illegal drugs, or placement of furniture to ensure built environment accessibility. Skyline does have an existing policy regarding service animals, as well as how to handle any incidents regarding service animals.

Program Access solutions used to create access are currently not approved by the ADA Coordinator but instead at Capital Improvement Program meetings. Once these solutions are put in place, it is unclear how they are documented to ensure proper implementation.

Reasonable Accommodation

Information regarding and contact information for Skyline College's reasonable accommodations is available on its website, delineated between accommodations for students and faculty/staff/employees. For Skyline's publicly available programs, services and activities (e.g. job fairs, athletic events, commencement exercises), survey responses indicate that a process for providing reasonable accommodations needs to be set up. Additionally, it is unclear how reasonable accommodations are managed for volunteers.

Survey responses indicate that Skyline may not have a policy regarding determination of undue burden, but does maintain a policy regarding determination of direct threat. Additionally, students are not charged for reasonable accommodations (it was not clear if this same anti-surcharge policy applied to faculty/staff/employees). Any concerns regarding safety and access issues may be raised to the Health and Safety Committee which holds monthly meetings.

ADA Self-Evaluation Report for: Skyline College

Grievances

Skyline's grievance system is available online and in the Student Catalog under "Student Rights & Responsibilities". It offers assistance to persons with disabilities who, because of their disability, may not otherwise be able to complete the grievance form. Additionally, the grievance process is laid out, e.g. timelines, decision makers, levels of review, contact information for ADA Coordinator. Grievance fact-finding is conducted by the ADA Coordinator, and the Coordinator has ready access to senior management in the event any issues need to be elevated.

Skyline survey responses indicate that the District is responsible for grievances brought against third party service providers. To date, Skyline is unaware of any complaints regarding disability civil rights matters.

Training

Survey responses indicated that new Skyline staff receive training on disability civil rights requirements during New Employee Orientation. Skyline is currently forming a College Disability Advisory Committee, so it has not yet been trained regarding State and Federal disability-related mandates. The Disability Resources Center has provided training on a variety of disability-related issues/etiquette and best practices to various departments on flex days. Survey responses indicate that Skyline offers training to maintenance staff to identify access and safety issues. Survey responses indicate that Skyline is interested in two levels of additional disability-related training: compliance, and best practices.

Human Resources

Survey responses indicate that Human Resources is responsible for administering the reasonable accommodations process for faculty/staff/employees. As noted above, information regarding this is available on the Skyline website. Human Resources is also responsible for investigating complaints regarding access and failure to reasonably accommodate. The above mentioned disability-related training for new hires is administered by Human Resources at the District level.

Communications

Recommended Actions

- Add a notice to Campus publications informing readers that publications are available in alternative formats.
- Examine whether Skyline's 911 system is accessible to TTYs and modems, or whether Skyline's 911 system is handled by County of San Mateo Public Safety Communications.
- Confer with DRC to determine whether Skyline has a policy in place to secure video remote interpreting services (VRI).

Survey Response Overview

Communications Generally

Survey responses state that Skyline's Disability Resource Center has identified a cadre of local resources which can provide auxiliary aids for communication as needed. Additionally, when announcements are distributed electronically from the Campus, they are sent in the body of the email as text and in PDF format as an attachment, as well as posted to the website in PDF format.

Print Materials

Survey responses indicate that, if a student requires College publications in an alternative format, they can make an alternate media request of course materials and other college materials through the Disability Resource Center. Campus publications do not typically contain a notice informing readers that publications are available in alternative formats.

Survey responses state that Skyline's Marketing, Communications and Public Relations team (MCPR) is aware of its obligation to ensure that publications do not portray persons with disabilities in a negative manner. College publications follow style guides. The use of specific fonts and font size are not strict requirements but Skyline MCPR strives to ensure readability.

Communication with People who are Deaf or Hard of Hearing (HoH)

Survey responses indicate that Skyline's 911 system is accessible to TTYs and modems, but also note that Skyline's 911 system is handled by County of San Mateo Public Safety Communications. Skyline was unsure whether Campus telephone information lines have been examined to determine whether or not they are accessible to persons who are deaf and hard of hearing as these are handled by the District.

Survey responses were unsure as to whether Skyline has a policy in place to secure video remote interpreting services (VRI), and generally referred the question to the Disability Resource Center. Notably, all videos added on to Skyline's website since 2016/2017 academic year have been captioned. And while Skyline doesn't typically play videos in public locations such as waiting rooms, if utilized, these videos would be

captioned. With respect to use of sign language in tandem with a Public Information Officers, to date the College is unaware of this situation arising.

Faculty

Recommended Actions

- Confer with CPI and CTTL regarding the accessibility of instructional materials - both in print and online.

Survey Response Overview

As noted above, Human Resources processes any faculty-submitted requests for reasonable accommodation, and investigates any alleged failures thereof. The Disability Resources Center provides training to faculty as it relates to student-initiated requests for reasonable accommodations.

With respect to any policy/practice regarding faculty selecting instructional material being made available in alternative format and policies regarding accessible digital materials (e.g. private faculty websites) survey responses generally referred this question to the Vice President of Instruction (VPI) and the Center for Transformational Teaching and Learning (CTTL).

Information Technology & Digital Communication

Recommended Actions

- No recommendations at this time.

Survey Response Overview

Survey responses indicate that all website postings are reviewed for access before they are posted, and that the District ensures all websites meet current accessibility guidelines (i.e. WCAG 2.1). Additionally, web updates are uniformly performed and checked for accessibility.

All digital/electronic files posted after 2016-2017 are reviewed for accessibility before posting, and resources are available to assist campus with making pdfs accessible. Due to the volume of pdfs on the website, Skyline does not retroactively ensure that pdfs are accessible, but it appears that this could be done upon request to the Disability Resource Center. New forms added to the website are checked to ensure they are compatible with assistive technology. Additionally, videos posted to Skyline College websites are captioned.

Skyline does not currently utilize touch screen information systems. Survey responses indicate that computers are provided for student use - this issue is addressed more comprehensively in the section on Library Services, below. Skyline does operate an online distance learning program. If students require accessibility assistance with this program, they may request that from the Disability Resource Center. Survey responses indicate that Skyline is unaware of any complaints regarding web accessibility.

ADA Self-Evaluation Report for: Skyline College

Law Enforcement

Recommended Actions

- Offer training around best practices for interacting with persons with disabilities, as well as disability-related Federal and State requirements.
- Determine what steps might be taken to expand DPS access to DRC services and resources.

Survey Response Overview

Survey responses indicate that it is unclear whether law enforcement officers have received disability awareness training, such as the United States Department of Justice Roll Call videos. Skyline's Department of Public Safety officers are aware of District Accessibility and Skyline College DRC resources. While likely not well versed in specific disability civil rights mandates, officers are instructed to contact a supervisor and/or utilize the DRC when encountering individuals who may be disabled.

If an individual with a service animal is arrested, law enforcement would ask that individual regarding their wishes for custody and their request would be considered. If no other options existed, law enforcement would reach out to the Peninsula Humane Society & SPCA (PHS). For arrests where medical appliances (canes, walkers, hearing aids, oxygen tanks, etc.) were implicated, non-hazardous items would be either temporarily stored at the Department of Public Safety office, or with owner's permission given to a family member. Hazardous items would be turned over to emergency services personnel for proper handling. For arrests involving power wheelchairs, scooters and other large mobility devices, these would be possibly stored at a campus Facility Maintenance Center or with owner's permission turned over to family member.

ADA Self-Evaluation Report for: Skyline College

Any arrestee with medication needs would be turned over to emergency services personnel for proper handling. If called upon to interact with persons who are deaf or hard of hearing, DPS officers would utilize DRC and/or staff resources.

Most DPW officers at Skyline College have completed Crisis Intervention Training (CIT): a 40-hour course where sworn law enforcement members will update their skills, knowledge and abilities including identification of the more common types of mental illness, skills for de-escalation of potentially violent situations, assessment of medication information, specifics on suicide intervention and a mental health system overview. CIT training includes identification of the more common types of mental illness, skills for de-escalation of potentially violent situations, assessment of medication information, specifics on suicide intervention and a mental health system overview. This training greatly enhances the provision of services to mentally ill members of the community as well as citizens who are in crisis, e.g. victims of crime, tragic accidents, etc.

Survey responses indicated that the Department of Public Safety would like to improve its services by ensuring around-the-clock access to campus DRC services on an on-call, as-need, emergency basis.

Library Services

Recommended Actions

- Review Library's self-identified areas for possible improvement, below.

Survey Response Overviews

Library Services Program Survey

Survey responses indicate that the library's primary role is to provide resources, programs, and services that support student completion and enhance the overall learning experience of Skyline College's community. Library Staff has received disability awareness and disability-related mandates via Flex Days, Equity training, as well via Emergency Preparedness training.

The Library lists its main objectives as follows:

- Teach information literacy to students in various academic disciplines and vocational programs, tailored to specific subjects and course level assignments and projects.
- Provide synchronous, asynchronous, online, and in-person research assistance. Librarians provide "eReference" services via email and via "Live chat".
- Contribute to textbook affordability solutions by working closely with the ZTC Program Coordinator and faculty members in their efforts to convert courses to Zero-Textbook-Cost
- Support the College's role as a leading academic and cultural center for the community through innovative outreach programs (Human Library, Poetry Corners, Banned Books Week, etc.) as well as partnerships with the Peninsula Library System (PLS) and other organizations (i.e. Food For Fines and Voter Registration drives).
- Serve as an access point and support center for educational technology and digital literacy. In addition to using Library computers for database and Internet searching, students rely on the Library to access and complete online homework assignments and tutorials, create and print essays, projects, and PowerPoint presentations, view online videos and podcasts, listen to online lectures, register for courses, email instructors, and much more.
- Maintain a collection of print and electronic resources as well as instructional equipment that support the curriculum and extracurricular needs of our programs.

- ❑ Serve as a student study center and gathering place for students. The Library provides quiet spaces as well as group study rooms that can be reserved via our website.

Survey responses indicate that the majority of the desktop computers are on wheelchair accessible desks. In classrooms, two desks can be easily adjusted as well. The Library has terminals with Text-to Speech (Kurzweil) and screen reader (Jaws) software. The Library also has an Aladdin Genie magnifier for students or users with visual impairments. Additionally, the Library's video databases include films with closed captioning and transcripts. The Library is not actively acquiring video tapes or DVDs. Most of its video collections are online. Films on Demand and Alexander Street Press collections offer closed captioning on all of their videos. Videos in these collections also include transcripts.

Stacks and library furniture are arranged in a manner that allows access for persons who use wheelchairs. Specifically, between shelving units there is required space for wheelchair accessibility (4 ft). Additionally, ample space is found around common sitting areas, quiet study areas, and classrooms. Survey responses indicate that persons of short stature, with mobility limitations, and/or with visual impairments can retrieve books from high shelves. Specifically, Library users have the option to use library provided, safe & secure, library stools. Staff is present to assist any library users that require additional assistance. The tallest shelf unit in the library is 5 ft 3in. Printed informational materials are placed in multiple locations at different levels to ensure reachability.

Persons with disabilities may obtain library materials in alternative formats by requesting help from Library staff. Electronic resources can be accessed with terminals

that have assistive technology installed (Jaws, Kurzweil). While the Library does not currently have Large print materials or Braille collection, staff can assist in locating materials from the Peninsula Library System. Skyline College is part of this consortium and shares resources with 33 libraries in the county.

Survey responses indicate that persons with visual impairments may conduct library research projects in a variety of ways. Specifically, library users can request help from staff or independently use assistive technology. Library databases include Text-to-Speech software as well magnifiers apps. Skyline College strives to work with vendors that are committed to providing access to all users and they reflect so in their accessibility statements.

As part of Skyline College and the San Mateo Community College District, Library emergency preparedness training includes addressing issues relative to persons with disabilities. For example, two evacuation chairs are in the library. Emergency Alerts are communicated via loud public announcements.

The Library indicates that, to its knowledge, it has not received any complaints regarding access to its programs, services or activities.

Survey responses indicate that the Library would like to improve its accessibility in the following ways:

- Signage could be improved in the form of Braille or low placed electronic signage.
- For example, stacks could have lower call number signs or monitors so it would be easier for library users to locate books.
- Training on assistive technology could be done at least twice a year.
- Newer magnifying or scanning technology could be acquired (i.e. Pen Scanners / Readers).

Meetings & Events

Recommended Actions

- Develop and implement meetings and events best practices checklist - including accessibility in built environments and content access - and ensure that it is utilized by all persons responsible for meeting and event management.
- Develop and implement guidance for exhibits accessibility, e.g. guidance available through the Smithsonian Institute.

Survey Response Overview

Events Generally

Survey responses indicate it is unclear whether: there is a notice on all public meeting announcements that auxiliary aids and services are made available as needed for meeting participants with disabilities; persons administering meetings or events are trained in best practices for events accessibility; or service animal relief areas are identified. If requests for special seating are made ahead of time, those are accommodated. If inquiries regarding the accessibility of an event space are made, meeting organizers can evaluate the space ahead of time to identify accessible parking areas, arrival points, restrooms and paths of travel. Survey responses generally indicated an awareness around ensuring temporary built environment accessibility, e.g. companion seating, integrated seating, knee clearances, and seating options. There was some concern that certain outdoor paths of travel may not be slip-resistant.

With respect to stages, speaking platforms, microphones and other items to be used by persons with disabilities, survey responses indicated ambiguity on whether: ramps can be used with platforms; adjustable podiums; touch screen control systems or

the availability of gooseneck microphones. Survey responses indicated that Skyline does have table mics that can be affixed to table tops.

With regard to best practices for presenting content to persons with disabilities, survey responses indicated some inconsistency. Videos shown at events typically are not captioned, but events live-streamed (e.g. Commencement) are captioned. It is not known if FM Loop systems are utilized, but best practices regarding sign language interpreters is generally implemented. Skyline provides transportation to field trips and events, and is currently developing a checklist to ensure accessibility for such events.

Exhibits

With regard to exhibits, Skyline is not aware of any complaints regarding accessibility to these, and does not currently use accessible guidance documentation, e.g. guidance available through the Smithsonian Institute. Survey responses indicate that the gallery does not typically produce brochures for its exhibits. The College currently does not have a process for determining wayfinding during exhibits, but does consider appropriate access space in exhibit layouts. Survey responses indicate that Skyline exhibits do not utilize audio descriptors or consider tactile interactivity and audio components depending on the artist. Skyline's gallery does not currently provide auditory captioning. While it currently does not have any electronic information distribution, it occasionally features art with an electronic component that may or may not be accessible.

Survey responses indicate that the gallery does not currently implement equivalent facilitation communication techniques for exhibits that cannot otherwise be

made accessible. Additionally, staff do not appear to have received training regarding communicating with guests who may have disabilities.

Physical Education

Recommended Actions

- No additional recommendations at this time.

Survey Response Overview

Skyline's Physical Education department offers sections of Adapted Physical Education courses, and offers waiver of physical education graduation requirements for individuals with disabilities who request it. The department coordinates other requests for reasonable accommodation with the Disability Resource Center.

The PE department's space is very compact and, as a result, all persons are served in an adaptive, integrated setting. The department works to ensure that all equipment is accessible, despite space limitations. The department also works to ensure that students can be accommodated in its classes. In the few instances of students who were blind, the department provided the student an aid to work with and assist the student. Survey responses indicate that the Physical Education department has not received complaints regarding a lack of accessibility or failure to accommodate, but they are open to additional suggestions or recommendations on how to improve.

Purchasing & Service Contracts

Recommended Actions

- Ensure that contract language is in place holding contractors and vendors to applicable State and Federal disability civil rights mandates
- Develop accessibility plan checks when vendors are conducting tenant improvements in public services areas.
- Develop and implement protocols to ensure that accessibility is considered during the purchase of new equipment (other than instances where accessibility has been specifically requested or is required by law).
- Confirm that, if a person with a disability believes they have been discriminated against by a campus vendor or contractor, this would be handled at the District level.

Survey Response Overview

Survey responses indicate a lack of certainty as to whether: contract language in place holding contractors and vendors to applicable State and Federal disability civil rights mandates; accessibility plan checks are done when vendors are conducting tenant improvements in public services areas; and accessibility is considered during the purchase of new equipment (other than instances where accessibility has been specifically requested or is required by law). If a person with a disability believes they have been discriminated against by a campus vendor or contractor, survey responses indicate this would be handled at the District level.

Student & Community Services

Recommended Actions

- Evaluate off-site programs to ensure maximum accessibility for students with disabilities.

Survey Response Overview

Student requests for reasonable accommodations are generally coordinated by the Disability Resource Center. Any grievances regarding accessibility and/or failure to reasonably accommodate are also handled by the DRC. Auxiliary aids and services are coordinated through the Disability Resource Center unless the student prefers to work directly with the ADA Coordinator, and community resources have been identified for use in accommodation of students or the public. An interactive process is used when determining reasonable accommodations and that process is documented in student file contact notes, as well as acknowledged via student signature on the Academic Accommodation Plan. The DRC has a Therapy Dog (comfort animal) Agreement for students seeking a comfort animal as an accommodation.

Skyline offers offsite programs, specifically, the Bay Area Entrepreneur Center (BAEC). It is unclear whether accessibility is ensured in the context of this program, but survey responses generally indicate that there are no specific policies or practices that would exclude students with disabilities from participating in any Skyline student programs.

There is currently a plan in place to involve student advisory groups in the ADA project in terms of project input and vetting of results.

Disability Resource Center

The Disability Resource Center offers assistance in completing forms if, because of a disability such as physical, sensory, or cognitive, someone is unable to complete the forms independently. Forms and publications are available in alternative formats,

and auxiliary aids and services are available as needed for students with disabilities. The DRC's physical space is set up in a manner that provides clear space for wheelchair access and space for service animals. DRC does not host public meetings or events.

The DRC adheres to the San Mateo County Community College District Policy and Procedures for Providing Academic Adjustments for Students with Disabilities. During DRC's annual campus wide emergency training, floor and captain leads are trained to aid persons with disabilities in the case of an emergency. DRC reports that it is unaware of complaints regarding accessibility or a failure to reasonably accommodate.

Medical Services

Recommended Actions

- Develop and offer training to all staff, including nurses, regarding best practices for interacting with patients with disabilities.
- Implement policies designed to ensure that patients with disabilities do not experience any delays in treatment due to their disability.
- Conduct accessibility reviews of all medical facilities (including furniture and equipment) to ensure compliance with accessibility regulations and, ideally, best practices.

Survey Response Overview

Survey responses indicate that medical facilities have a space where wheelchair users can be examined on a table rather than in their chair, but would need to help themselves onto the table. No transfer assistance is available beyond the nurse. Other

than in nurse training programs, nurses do not receive training on best practices for communicating with patients with disabilities. Staff have, generally, not received training on best practices for interacting with patients with disabilities.

There is currently no policy in place which ensures that the patient will be treated despite the fact it may take longer to treat them than it would other patients, but there have been no times when patients were required to wait longer than other patients for treatment because the accessible equipment needed was in use.

Survey responses indicated that all medical facilities have not been reviewed for physical access by a CAsp certified surveyor, and that medical equipment is not accessible to persons with disabilities.

Waiting room furnishings are arranged in such a way that there is space for wheelchair users or persons using service animals to sit, but high and wide based seating is not available in waiting rooms to accommodate patients that have difficulty getting out of low chairs, or who are large and may not fit into standard chairs.

Emergencies & Evacuation Procedures

Recommended Actions

- Consider direct outreach to persons with disabilities for inclusion in development and drilling of emergency management plans.
- Consult with an accessibility professional to ensure that all communications and alarm systems are in compliance with current accessibility regulations (this may be part of the Transition Plan).

Survey Response Overview

Skyline's Emergency Operations Plan (EOP) follows standard guidelines regarding providing assistance to disabled persons as identified by the U.S. Equal Employment Opportunity Commission, and this EOP has been coordinated with local and regional emergency services agencies. Additionally, the College has an Emergency Announcement System (EAS) where messages for emergencies are broadcast over a loudspeaker.

Building Captains are in place to assist during an event and have been trained regarding the needs of persons with disabilities in emergency situations. Assisting persons with disabilities is part of the responsibilities of the building captain position. In the event that HVAC needs to be shut down for emergency reasons during a shelter in place, this would be handled by the Facilities Department.

Emergency drills, debriefing, and training is available to Skyline's entire internal campus community though does not appear intentionally targeted to include persons with disabilities.

In the event of an active shooter, Skyline could communicate with people who have disabilities via emergency messaging, such as text, telephone call, audible (EAS) broadcasts, and electronic monitor (visual) messaging. In response to a bomb threat, if evacuation is required, the assembly site is checked for explosives before it is populated by the Department of Public Safety.

During shelter-in-place events, medical and medication needs are addressed on a case by case basis. Long term needs would require the assistance of the Red Cross and/or emergency services personnel. Information is available to staff regarding how to

deal with various types of events on the District website as well as in printed form throughout campus.

Fire alarms and strobe lighting alarm systems are installed, and exit signs clearly marked as required by law. PA systems are monitored by maintenance staff to ensure the volume is high enough to be heard throughout the intended areas of impact, and are tested regularly. Back-up emergency evacuation chairs in place, unlocked, and maintained, and staff are trained in the use of these chairs.

If areas of safe refuge will be in use, there is a communication system from that site to the event control center. Specifically, communication would be by two-way radio, and/or mobile phone. Text messaging could be utilized by a person who is Deaf or Hard of Hearing.

In order to keep people hydrated if it is necessary to hold them outside the building for a prolonged period during hot weather, District Auxiliary Services and Enterprise Operations stock would be utilized in an emergency.

Construction

Recommended Actions

- Confirm that the District monitors access during planning and construction of any major project.

Survey Response Overview

Construction and Remodels

According to survey responses, design contracts hold design professionals to designs that use, at minimum, the most stringent access standards in effect at the time
ADA Self-Evaluation Report for: Skyline College

of the project. Additionally, design contracts encourage design professionals to exceed the maximum access standards when possible to ensure that construction tolerances are built into the project. Further, Facilities and Construction Project departments utilize CASps at key points of construction and at completion, and major public projects are reviewed by stakeholders with disabilities during the planning stage. Survey responses indicate that the District handles access monitoring during planning and construction.

Vetting of Self-Evaluation Results

Skyline College is committed to the vetting of these results with stakeholders as required by law and developing an implementation plan designed to implement necessary changes and track good-faith compliance efforts.

Vetting Activity

Report Concerning the Self-Evaluation Vetting

- Date(s) and location(s) of vetting
- List of attendees

Input Received During Vetting

Response to Input during Vetting:

Persons Involved in Vetting:

Use of This Self-Evaluation as a Living Document

The ADA requires that a Self-Evaluation be conducted once. Many entities, including Skyline College, recognize the value of using this document on an ongoing basis. As such, it's available to incorporate new policies as needed in response to emerging issues in case law, new regulations or the development of, and/or modification of College programs. Thus, an addendum to this report can be added as needed to document the College's good-faith effort to make the changes necessary to ensure appropriate access for students, employees and visitors to Skyline College.

Staff Who Contributed to this ADA Self-Evaluation

Michelle Batista & Melissa Matthews RN, Director of Student Support & DRC
Cheri Colin, Director of Community Relations and Marketing
Dr. Angelica Garcia, VPSS
Judy Hutchinson, College Business Officer
Rolin Moe, Dean of ASLT
Emily Risk RN, Director of Student Support
Gabriela Nocito, Director of Learning Commons
Danni Redding Lapuz, Social Science/Creative Arts Dean
Jim Vangele, Public Safety

Work Plan for the Self-Evaluation Implementation

The following is the Skyline College ADA Self-Evaluation work plan. It is contained in a spreadsheet designed to be modified as progress is made. It may also be modified when work is necessary that is not identified within the body of this Report. Such instances may occur pursuant to new regulations or case law developments.

The first column will contain a series of recommendations that come from interaction with Skyline College officials. These are entitled "General Recommendations". The second column is "Action Taken by the College". This column is designed to record whether the College has accepted the recommendation, modified or rejected it. If the recommendation is rejected or modified it would be advisable to record the rationale for this action in the "notes" section, which is the seventh column to the right. Columns titled "Staff Assigned", Due Dates, "Reviewed by" and "Date" are designed to record progress in the implementation of the ADA self-evaluation.

Many of the recommendations are clustered by subject and can be addressed with one staff assignment. Occasionally, there will be one recommended action that addresses a number of issues noted within the report. For example, disability awareness training benefits the College's operation in a number of areas which are noted by findings. The provision of the training, therefore, addresses a wide variety of issues.

It is very important that the date on the work plan be updated each time an entry is made.

Appendices

Appendix A

28 CFR 35.105 Self-Evaluation.

- (a) A public entity shall, within one year of the effective date of this part, evaluate its current services, policies, and practices, and the effects thereof, that do not or may not meet the requirements of this part and, to the extent modification of any such services, policies, and practices is required, the public entity shall proceed to make the necessary modifications.

- (b) A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the Self-Evaluation process by submitting comments.
- (c) A public entity that employs 50 or more persons shall, for at least three years following completion of the Self-Evaluation, maintain on file and make available for public inspection:
 - (1) A list of the interested persons consulted;
 - (2) A description of areas examined and any problems identified;
and
 - (3) A description of any modifications made.
- (d) If a public entity has already complied with the Self-Evaluation requirement of a regulation implementing section 504 of the Rehabilitation Act of 1973, then the requirements of this section shall apply only to those policies and practices that were not included in the previous Self-Evaluation

Appendix B

California Government code section 11135

11135. (a) No person in the State of California shall, on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, genetic information, or disability, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state. Notwithstanding Section 11000, this section applies to the California State University.

(b) With respect to discrimination on the basis of disability, programs and activities subject to subdivision (a) shall meet the protections and prohibitions contained in Section 202 of the federal Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12132), and the federal rules and regulations adopted in implementation thereof, except that if the laws of this state prescribe stronger protections and prohibitions, the programs and activities subject to subdivision (a) shall be subject to the stronger protections and prohibitions.

(c) (1) As used in this section, "disability" means any mental or physical disability, as defined in Section 12926.

Appendix C

California Government Code Section 12926

Cal Gov Code § 12926 (2010)

§ 12926. Definitions regarding unlawful practices

As used in this part in connection with unlawful practices, unless a different meaning clearly appears from the context:

(a) "Affirmative relief" or "prospective relief" includes the authority to order reinstatement of an employee, awards of backpay, reimbursement of out-of-pocket expenses, hiring, transfers, reassignments, grants of tenure, promotions, cease and desist orders, posting of notices, training of personnel, testing, expunging of records, reporting of records, and any other similar relief that is intended to correct unlawful practices under this part.

(b) "Age" refers to the chronological age of any individual who has reached his or her 40th birthday.

(c) "Employee" does not include any individual employed by his or her parents, spouse, or child, or any individual employed under a special license in a nonprofit sheltered workshop or rehabilitation facility.

(d) "Employer" includes any person regularly employing five or more persons, or any person acting as an agent of an employer, directly or indirectly, the state or any political or civil subdivision of the state, and cities, except as follows:

"Employer" does not include a religious association or corporation not organized for private profit.

(e) "Employment agency" includes any person undertaking for compensation to procure employees or opportunities to work.

(f) "Essential functions" means the fundamental job duties of the employment position the individual with a disability holds or desires. "Essential functions" does not include the marginal functions of the position.

(1) A job function may be considered essential for any of several reasons, including, but not limited to, any one or more of the following:

(A) The function may be essential because the reason the position exists is to perform that function.

(B) The function may be essential because of the limited number of employees available among whom the performance of that job function can be distributed.

(C) The function may be highly specialized, so that the incumbent in the position is hired for his or her expertise or ability to perform the particular function.

(2) Evidence of whether a particular function is essential includes, but is not limited to, the following:

(A) The employer's judgment as to which functions are essential.

(B) Written job descriptions prepared before advertising or interviewing applicants for the job.

(C) The amount of time spent on the job performing the function.

(D) The consequences of not requiring the incumbent to perform the function.

(E) The terms of a collective bargaining agreement.

(F) The work experiences of past incumbents in the job.

(G) The current work experience of incumbents in similar jobs.

(g) "Labor organization" includes any organization that exists and is constituted for the purpose, in whole or in part, of collective bargaining or of dealing with employers concerning grievances, terms or conditions of employment, or of other mutual aid or protection.

(h) "Medical condition" means either of the following:

(1) Any health impairment related to or associated with a diagnosis of cancer or a record or history of cancer.

(2) Genetic characteristics. For purposes of this section, "genetic characteristics" means either of the following:

(A) Any scientifically or medically identifiable gene or chromosome, or combination or alteration thereof, that is known to be a cause of a disease or disorder in a person or his or her offspring, or that is determined to be associated with a statistically increased risk of development of a disease or disorder, and that is presently not associated with any symptoms of any disease or disorder.

(B) Inherited characteristics that may derive from the individual or family member, that are known to be a cause of a disease or disorder in a person or his or her offspring, or that are determined to be associated with a statistically increased risk of development of a disease or disorder, and that are presently not associated with any symptoms of any disease or disorder.

(i) "Mental disability" includes, but is not limited to, all of the following:

(1) Having any mental or psychological disorder or condition, such as mental retardation, organic brain syndrome, emotional or mental illness, or specific learning disabilities, that limits a major life activity. For purposes of this section:

(A) "Limits" shall be determined without regard to mitigating measures, such as medications, assistive devices, or reasonable accommodations, unless the mitigating measure itself limits a major life activity.

(B) A mental or psychological disorder or condition limits a major life activity if it makes the achievement of the major life activity difficult.

(C) "Major life activities" shall be broadly construed and shall include physical, mental, and social activities and working.

(2) Any other mental or psychological disorder or condition not described in paragraph (1) that requires special education or related services.

(3) Having a record or history of a mental or psychological disorder or condition described in paragraph (1) or (2), which is known to the employer or other entity covered by this part.

(4) Being regarded or treated by the employer or other entity covered by this part as having, or having had, any mental condition that makes achievement of a major life activity difficult.

(5) Being regarded or treated by the employer or other entity covered by this part as having, or having had, a mental or psychological disorder or condition that has no present disabling effect, but that may become a mental disability as described in paragraph (1) or (2).

"Mental disability" does not include sexual behavior disorders, compulsive gambling, kleptomania, pyromania, or psychoactive substance use disorders resulting from the current unlawful use of controlled substances or other drugs.

(j) "On the bases enumerated in this part" means or refers to discrimination on the basis of one or more of the following: race, religious creed, color, national origin,

ancestry, physical disability, mental disability, medical condition, marital status, sex, age, or sexual orientation.

(k) "Physical disability" includes, but is not limited to, all of the following:

(1) Having any physiological disease, disorder, condition, cosmetic disfigurement, or anatomical loss that does both of the following:

(A) Affects one or more of the following body systems: neurological, immunological, musculoskeletal, special sense organs, respiratory, including speech organs, cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin, and endocrine.

(B) Limits a major life activity. For purposes of this section:

(i) "Limits" shall be determined without regard to mitigating measures such as medications, assistive devices, prosthetics, or reasonable accommodations, unless the mitigating measure itself limits a major life activity.

(ii) A physiological disease, disorder, condition, cosmetic disfigurement, or anatomical loss limits a major life activity if it makes the achievement of the major life activity difficult.

(iii) "Major life activities" shall be broadly construed and includes physical, mental, and social activities and working.

(2) Any other health impairment not described in paragraph (1) that requires special education or related services.

(3) Having a record or history of a disease, disorder, condition, cosmetic disfigurement, anatomical loss, or health impairment described in paragraph (1) or (2), which is known to the employer or other entity covered by this part.

(4) Being regarded or treated by the employer or other entity covered by this part as having, or having had, any physical condition that makes achievement of a major life activity difficult.

(5) Being regarded or treated by the employer or other entity covered by this part as having, or having had, a disease, disorder, condition, cosmetic disfigurement, anatomical loss, or health impairment that has no present disabling effect but may become a physical disability as described in paragraph (1) or (2).

(6) "Physical disability" does not include sexual behavior disorders, compulsive gambling, kleptomania, pyromania, or psychoactive substance use

disorders resulting from the current unlawful use of controlled substances or other drugs.

(l) Notwithstanding subdivisions (i) and (k), if the definition of "disability" used in the Americans with Disabilities Act of 1990 (Public Law 101-336) would result in broader protection of the civil rights of individuals with a mental disability or physical disability, as defined in subdivision (i) or (k), or would include any medical condition not included within those definitions, then that broader protection or coverage shall be deemed incorporated by reference into, and shall prevail over conflicting provisions of, the definitions in subdivisions (i) and (k).

(m) "Race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, marital status, sex, age, or sexual orientation" includes a perception that the person has any of those characteristics or that the person is associated with a person who has, or is perceived to have, any of those characteristics.

(n) "Reasonable accommodation" may include either of the following:

(1) Making existing facilities used by employees readily accessible to, and usable by, individuals with disabilities.

(2) Job restructuring, part-time or modified work schedules, reassignment to a vacant position, acquisition or modification of equipment or devices, adjustment or modifications of examinations, training materials or policies, the provision of qualified readers or interpreters, and other similar accommodations for individuals with disabilities.

(o) "Religious creed," "religion," "religious observance," "religious belief," and "creed" include all aspects of religious belief, observance, and practice.

(p) "Sex" includes, but is not limited to, pregnancy, childbirth, or medical conditions related to pregnancy or childbirth. "Sex" also includes, but is not limited to, a person's gender, as defined in *Section 422.56 of the Penal Code*.

(q) "Sexual orientation" means heterosexuality, homosexuality, and bisexuality.

(r) "Supervisor" means any individual having the authority, in the interest of the employer, to hire, transfer, suspend, lay off, recall, promote, discharge, assign, reward, or discipline other employees, or the responsibility to direct them, or to adjust their grievances, or effectively to recommend that action, if, in connection with the foregoing, the exercise of that authority is not of a merely routine or clerical nature, but requires the use of independent judgment.

(s) "Undue hardship" means an action requiring significant difficulty or expense, when considered in light of the following factors:

(1) The nature and cost of the accommodation needed.

(2) The overall financial resources of the facilities involved in the provision of the reasonable accommodations, the number of persons employed at the facility, and the effect on expenses and resources or the impact otherwise of these accommodations upon the operation of the facility.

(3) The overall financial resources of the covered entity, the overall size of the business of a covered entity with respect to the number of employees, and the number, type, and location of its facilities.

(4) The type of operations, including the composition, structure, and functions of the workforce of the entity.

(5) The geographic separateness, administrative, or fiscal relationship of the facility or facilities.

HISTORY:

Added Stats 1980 ch 992 § 4. Amended Stats 1985 ch 1151 § 1; Stats 1990 ch 15 § 1 (SB 1027); Stats 1992 ch 911 § 3 (AB 311), ch 912 § 3 (AB 1286), ch 913 § 21.3 (AB 1077); Stats 1993 ch 1214 § 5 (AB 551); Stats 1998 ch 99 § 1 (SB 654); Stats 1999 ch 311 § 2 (SB 1185), ch 591 § 5.1 (AB 1670), ch 592 § 3.7 (AB 1001); Stats 2000 ch 1049 § 5 (AB 2222); Stats 2003 ch 164 § 1 (AB 196); Stats 2004 ch 700 § 4 (SB 1234).

Amendments:

1985 Amendment:

Added (1) "or her" after "employed by his" in subd (b); and (2) subd (i).

1990 Amendment:

Added subd (j).

1992 Amendment:

(1) Added subd (a); (2) redesignated former subds (a)-(d) to be subds (b)-(e); (3) amended the introductory clause of subd (d) by (a) deleting ", except as hereinafter provided," before "includes"; and (b) substituting ", except as follows:" for a period; (4) added subdivision designation (d)(1); (5) added subd (d)(2); (6) added subd (f); (7) redesignated former subdivisions (e) and (f) to be subds (g) and (h); (8) substituted "includes, but is not limited to," for "means" in subd (h); (9) added subd (i); (10)

ADA Self-Evaluation Report for: Skyline College

redesignated former subd (g) to be subd (j); **(11)** substituted "disability, mental disability" for "handicap" in subd (j); **(12)** substituted subd (k) for former subd (h) which read: "(h) 'Physical handicap' includes impairment of sight, hearing, or speech, or impairment of physical ability because of amputation or loss of function or coordination, or any other health impairment which requires special education or related services."; **(13)** added subds (l) and (m); **(14)** redesignated former subds (i) and (j) to be subds (n) and (o); and **(15)** added subd (p) and the last paragraph. (As amended 1992 ch 913, compared to the section as it read prior to 1992. This section was also amended by two earlier chapters, ch 911, ch 912. See *Gov C § 9605*.)

1993 Amendment:

(1) Substituted "functions" for "duties" after "Essential" both times it appears in subd (f); **(2)** deleted ", but is not limited to," after "includes" in subd (h); **(3)** deleted former subd (l) which read: "(l) 'Reasonable accommodation' may include either of the following:

"(1) Making existing facilities used by employees readily accessible to, and usable by, individuals with disabilities.

"(2) Job restructuring, part-time or modified work schedules, reassignment to a vacant position, acquisition or modification of equipment or devices, adjustment or modifications of examinations, training materials or policies, the provision of qualified readers or interpreters, and other similar accommodations for individuals with disabilities. It is the intent of the Legislature that the definition of 'physical disability' in this subdivision shall have the same meaning as the term 'physical handicap' formerly defined by this subdivision and construed in *American National Ins. Co. v. Fair Employment & Housing Com.*, 32 Cal. 3d 603. However, 'physical disability' does not include conditions excluded from the federal definition of 'disability' pursuant to Section 511 of the Americans with Disabilities Act of 1990 (42 U.S.C., § 12211). Additionally, for purposes of this part, the unlawful use of controlled substances or other drugs shall not be deemed, in and of itself, to constitute a physical disability."; **(4)** designated the former last paragraph in the section to be subd (l); and **(5)** substituted "of" for "or" after "size of the business" in subd (p)(3).

1998 Amendment:

(1) Amended subd (d) by **(a)** substituting the comma after "indirectly" for the semicolon; and **(b)** adding the comma after "thereof"; **(2)** substituted "that" for "which" after "organization" in subd (g); **(3)** amended subd (h) by adding **(a)** "(1) genetic characteristics, or (2)" after "include" in the first sentence; and **(b)** the second sentence; and **(4)** added "and" before "(5) the geographic" in subd (p).

1999 Amendment:

(1) Amended subd (d) by (a) substituting "of the state" for "thereof" in the introductory clause; (b) deleting subdivision designation (d)(1) at the beginning of the second paragraph; and (c) deleting former subd (d)(2) which read: "(2) 'Employer,' for purposes of provisions defining unlawful employment practices related to mental disability, means any person regularly employing 15 or more persons, or any person directly or indirectly acting as an agent of such an employer, and also includes the state and municipalities and political subdivisions of the state."; (2) substituted subd (h) for former subd (h) which read: "(h) 'Medical condition' includes (1) genetic characteristics, or (2) any health impairment related to or associated with a diagnosis of cancer, for which a person has been rehabilitated or cured, based on competent medical evidence. For purposes of this section, 'genetic characteristics' means any scientifically or medically identifiable gene or chromosome, or combination or alteration thereof, that is known to be a cause of a disease or disorder in a person or his or her offspring, or is determined to be associated with a statistically increased risk of development of a disease or disorder, or inherited characteristics that may derive from the individual or family member, that is presently not associated with any symptoms of any disease or order."; (3) substituted "or age" at the end of subd (j); (4) added subd (m); (5) redesignated former subds (m)-(o) to be subds (n)-(p); (6) added subds (q) and (r); and (7) redesignated former subd (p) to be subd (s). (As amended Stats 1999 ch 592, compared to the section as it read prior to 1999. This section was also amended by two earlier chapters, ch 311 and ch 591. See *Gov C § 9605*.)

2000 Amendment:

(1) Amended subd (h) by (a) adding "means" in the introductory clause; and (b) substituting "cancer or a record or history of cancer" for ", for which a person has been rehabilitated or cured, based on competent medical evidence" in subd (h)(1); (2) substituted subd (i) for former subd (i) which read: "(i) 'Mental disability' includes any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. However, 'mental disability' does not include conditions excluded from the federal definition of 'disability' pursuant to Section 511 of the Americans with Disabilities Act of 1990 (*42 U.S.C. Sec. 12211*). Additionally, for purposes of this part, the unlawful use of controlled substances or other drugs shall not be deemed, in and of itself, to constitute a mental disability."; and (3) substituted subd (k) for former subd (k) which read: "(k) 'Physical disability' includes, but is not limited to, all of the following:

"(1) Having any physiological disease, disorder, condition, cosmetic disfigurement, or anatomical loss that does both of the following:

"(A) Affects one or more of the following body systems: neurological, immunological, musculoskeletal, special sense organs, respiratory, including speech organs, cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin, and endocrine.

"(B) Limits an individual's ability to participate in major life activities.

"(2) Any other healthy impairment not described in paragraph (1) that requires special education or related services.

"(3) Being regarded as having or having had a disease, disorder, condition, cosmetic disfigurement, anatomical loss, or health impairment described in paragraph (1) and (2).

"(4) Being regarded as having, or having had, a disease, disorder, condition, cosmetic disfigurement, anatomical loss, or health impairment that has no present disabling effect but may become a physical disability as described in paragraph (1) or (2).

"It is the intent of the Legislature that the definition of 'physical disability' in this subdivision shall have the same meaning as the term 'physical handicap' formerly defined by this subdivision and construed in *American National Ins. Co. v. Fair Employment & Housing Com.* (1982) 32 Cal. 3d 603. However, 'physical disability' does not include conditions excluded from the federal definition of 'disability' pursuant to Section 511 of the Americans with Disabilities Act of 1990 (42 U.S.C., Sec 12211). Additionally, for purposes of this part, the unlawful use of controlled substances or other drugs shall not be deemed, in and of itself, to constitute a physical disability."

2003 Amendment:

(1) Added the second sentence of subd (p); and (2) amended subd (s) by substituting (a) "The" for "the" at the beginning of subds (s)(1)-(s)(5); and (b) the period for the comma at the end of subds (s)(1)-(s)(3) and the period for ", and" at the end of subd (s)(4).

2004 Amendment:

Substituted "*Section 422.56 of the Penal Code*" for "*Section 422.76 of the Penal Code*, except that, for purposes of this part, the reference in that definition to the "victim" shall mean the employee or applicant and the reference in that definition to the

"defendant" shall mean the employer or other covered entity or person subject to applicable prohibitions under this part" in subd (p).

Appendix D

Skyline College

Notice of Compliance Under ADA & California State Law

In accordance with the requirements of Title II of the Americans with Disabilities Act (ADA) of 1990, the Americans with Disabilities Amendments Act of 2008, the Fair Employment & Housing Act (FEHA), California Government Code Section 11135 and other applicable codes, Skyline College does not discriminate against individuals on the basis of disability in its services, programs or activities.

Employment: Skyline College does not discriminate on the basis of disability in its hiring or employment practices and will comply with the Fair Employment and Housing Act, as well as Title I of the ADA, including the regulations promulgated by the U.S. Equal Employment Opportunity Commission (EEOC), including the requirement to provide reasonable accommodations.

Effective Communication: Skyline College will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities, including sign language interpreters, documents in Braille and other alternate formats to ensure information and communication is accessible to people who have speech, hearing, vision, or cognitive impairments so they can participate equally in the programs, services and activities.

Modification to Policies and Procedures: Skyline College will make reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to participate in all of its programs, services and activities. *For example, individuals with service animals behaving within applicable standards are welcome in offices and College facilities, even when pets are generally prohibited.*

Anyone who requires auxiliary aids and services for effective communication, or a

ADA Self-Evaluation Report for: Skyline College

modification of policies or procedures to participate in a program, service or activity in Skyline College should submit their request for reasonable accommodations to **(ADA COORDINATOR EMAIL ADDRESS NEEDED HERE)** (unless otherwise specified) as soon as possible, but no later than **72 hours** before the scheduled event.

Neither the ADA, nor state law requires Skyline College to take action that would fundamentally alter the nature of its programs, activities or services or impose an undue financial or administrative burden. Complaints about web accessibility, alternate media or academic accommodations can be submitted online via our online complaint form **(link: (ADD LINK(S) HERE).**

Skyline College will not place a surcharge on a particular individual with a disability or a group of individuals with disabilities to cover the cost of providing auxiliary aids and services or making a reasonable modification to a policy to create access.

Appendix E

Skyline College

ADA Notice Dissemination Plan

Title II of the ADA, 28 CFR 35.106¹ requires that Skyline College produce and disseminate a notice of their ADA compliance.

The notice should be written clearly without undue complication. It should discuss what ADA requirements the entity is held to, the name of the ADA Coordinator, and provide current contact information enabling an individual to contact the ADA Coordinator. The notice should cover areas regarding:

- Employment;
- Effective Communication;
- Making reasonable modification to policies and programs;
- An explanation of the non-surcharge requirement concerning the provision of auxiliary aids and services; and
- Information regarding the grievance process.

In considering how to disseminate this document, the College should identify the impacted parties who would have an interest in the notice. The notice dissemination plan should address the frequency of notice dissemination. Methods of dissemination may include:

- The College's website;
- Local Newspaper(s);
- College Publications;
- Posters on College facilities;
- Inclusion of notice for special activities;
- Within transportation systems provided by the College;
- Within Disabled Students Programs and Services meetings and materials; and
- Other forms in which impacted stakeholders might be present.

Not all of the above notice dissemination methodologies may be necessary to effectively disseminate the notice.

¹28 CFR 35.106 Notice: A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part.

Appendix F

Grievance Procedure under ADA or California State Disability Civil Rights Laws

This grievance procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 (“ADA”), the Americans with Disabilities Amendments Act (ADAAA) and California State law. It may be used by anyone wishing to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs or benefits by Skyline College. The College’s Disability Discrimination Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of the complainant and location, date and a description of the problem(s). The College’s Grievance Procedure form is available online at <https://collegeofsanmateo.edu/forms/grievances.asp>. Alternative means of filing a complaint, such as personal interviews or a tape recording of the complaint, are available to persons with disabilities upon request.

Appendix G

Contact Information for the Skyline College Disability Resource Center and/or Skyline College ADA or Reasonable Accommodations Coordinator:

For questions related to student accommodations or verifying student disability and any resulting educational limitations you can contact:

[PLEASE ADD HERE]

Appendix H

SURVEY QUESTIONS

ADA Coordinator

1. Does the College have an ADA Notice of Compliance? If yes, does it address State law? Please attach the Notice.
2. Does the grievance system:
 - a. Offer assistance to persons with disabilities, who due to their disability are not able to complete the grievance form?
 - b. Provide timelines when a complainant can expect a result?
 - c. Have a second level of review?
 - d. Contain a notice regarding availability of the grievance system in alternative format?
 - e. Contain the name and contact information of the ADA Coordinator?
3. Are the ADA Notice of Compliance and the grievance system posted on the College website?
4. Who handles the fact finding and grievance administration?
5. Does the College have a plan for ADA Notice and Grievance dissemination?
6. Does the ADA Coordinator's office have ready access to senior management? If no, how are disability civil rights issues elevated in order that they may be addressed in a timely manner?
7. Who provides auxiliary aids and services to persons seeking accommodation under ADA Title II?

8. Who provides reasonable accommodations to applicants and employees under ADA Title I, ADAAA and California Government Code 12926 (employment)?
9. Who investigates grievances related to reasonable accommodations and other ADA related issues?
10. Is an interactive process used? If yes, how is it documented?
11. How is undue hardship determined and by whom?
12. Is there an anti-surcharge policy in place to make it clear to staff not to charge for accommodations?
13. Is contract language in place holding contractors and vendors to applicable State and Federal disability civil rights mandates? If yes, how is this enforced?
14. If a person with a disability believes they have been discriminated against by a campus vendor or contractor, what steps are open to them?
15. Is an accessibility plan check done when vendors are conducting tenant improvements in public services areas?
16. Is guidance in place for staff and vendors regarding clear space and furniture placement? If yes, please attach the guidance.

17. Does the College have a service animal policy? If yes, how is staff trained?
18. How is access for comfort animals addressed?
19. Is there a procedure in place to be used by staff should there be an incident involving a service animal? If yes, please attach the procedure.
20. How does the College address service animal relief areas during meetings and events?
21. Are all College publications offered in alternative formats?
22. Is there notice on all public meeting announcements that auxiliary aids and services are made available as needed for meeting participants with disabilities?
23. Is the College 911 system accessible to TTYs and modems?
24. Is College staff and vendors who have public contact trained or provided guidance regarding ADA requirements and disability awareness?
25. How are new employees oriented to etiquette, language and the College legal disability civil rights mandates?

26. When disability civil rights training is provided, do you retain a roster of trainees, information regarding the subject and length of the training, the training plan or PowerPoint and the trainer's resume?
27. Has the College Disability Advisory Committee (UA) been trained regarding the mandates the College is held to under ADA and California Government Code 11135 and 12926?
28. What trainings do you think should be provided to College faculty and staff?
29. Are publications reviewed to ensure they do not portray persons with disabilities in a negative manner?
30. Is there a policy and procedure in place to address policy modification requests and the determination of undue burden? If yes, when was it last updated? Please attach a copy of the policy.
31. Is there a policy and procedure in place to address direct threat determination to others? If yes, when was it last updated? Please attach a copy of the policy.
32. Is there a policy and procedure in place regarding maintenance of accessible features? If yes, please attach.
33. Is there a system in place to identify safety and access issues, which can be used by maintenance staff to report and/or correct problems?
34. Has maintenance staff been trained to identify access and safety issues?

35. If “*Program Access*” solutions are used to create access are they approved by the ADA Coordinator before they are put in place?
36. When “*Program Access*” solutions are put in place are they documented by a written procedure to ensure staff implements them appropriately?
37. Are transportation providers, if applicable, trained regarding, the use of tie downs, disability awareness, and the requirement that stops be called and other transportation mandates?
38. Has a policy been created to address motorized mobility devices, as required by 28 CFR 35.137? Note: This is a policy the College has the legal option of creating if it is seen to be in the College’s best interest.
39. When the purchase of new equipment is made, (purchases including, but not limited to communication and transportation equipment) how are access requirements addressed?
40. Does the College operate any programs, services or activities from a registered historic site? If yes, please list the sites.
41. Have law enforcement officers received disability awareness training, such as the US DOJ role call videos?
42. How is access monitored during campus related projects during planning and construction?

43. When entering into settlement agreements as part of the Project Civic Access, the US DOJ requires that the staff of Title II entities, which have public contact, attend a 4-hour training covering ADA requirements and disability awareness. How is the College informing impacted staff of the College's responsibilities and disability awareness?
44. In addition to staff training provided to date, are there other trainings you think should be produced? If yes, what training is needed and for whom?
45. Are there areas, not noted above, that you think should be studied within this Self-Evaluation?
46. Does the College have a policy in place that prohibits discrimination against persons who formerly used drugs illegally?
47. Does the College have any programs that sell tickets with assigned seating?
48. How are reasonable accommodations handled for College volunteers?
49. Does the College have an anti-disability harassment policy?
 - a. If yes, is it based upon zero tolerance or the legal definition of disability harassment?
 - b. How often is it disseminated to all College staff?
50. Is the President involved in and supportive of the ADA project?

51. What is the policy/practice regarding faculty selecting instructional material in a timely manner in order that it may be made available in alternative format as needed?
52. Does the campus operate any programs in the satellite locations? If yes, were they surveyed as part of the Transition Plan?
53. What is the system for providing accommodation to programs, activities and services provided to the public? In this question we're looking at job fairs, commencement exercises, athletic events, etc.
54. Has the campus had complaints regarding disability civil rights matters? If yes, please explain.
55. Does the campus operate a distance learning program? If yes, how is access addressed?
56. Is there a policy in place that controls the faculty use of their private websites for required instruction?
57. Does the campus have "smart classrooms?" If yes, is access for persons with disabilities checked in those classrooms including site lines and access to technology?
58. How are disability civil rights addressed in program components that are provided through a third-party contract? It is important to note that the campus may not legally enter into a business arrangement that contracts the way the campus disability civil rights responsibilities.

59. Historically, has a self-evaluation or transition plan ever been performed? If yes, what was the date of these evaluations and are they available?
60. Are there policies or practices in place that exclude students with disabilities from participating in certain programs such as nursing?
61. Have community resources been identified for use in accommodation of students or the public?
62. Is a plan in place to involve student advisory groups in the ADA project in terms of project input and vetting of results?
63. Does the campus provide transportation services to field trips and events?
64. What procedure is in place to address access needs during field trips or off campus activities?
65. How does the physical education department accommodate people with disabilities?
66. How is on campus construction monitored regarding the quality of access compliance?
67. Does the campus rent space to third-parties for activities?

68. Does the College rent space off-campus for the purpose of providing programs, services or activities? If yes, how is that space evaluated for physical access?

69. What staff training has occurred to date regarding disability civil rights requirements?

70. Does maintenance staff use motorized carts, which share the path of travel with pedestrians on campus? If so, what safety considerations have been made for persons with disabilities sharing this path of travel?

71. Do trucks making deliveries to campus share the pedestrian path of travel? If yes, has there been an effort to minimize the comingling of pedestrian travel with delivery truck movement?

72. Are there campus programs offered offsite? If yes, please describe these programs.

Communications

1. Does the Campus prescribe a certain font type for Campus published documents? If yes, what font type is used?
2. Does the Campus require a certain font size in Campus publications? If yes, please name the font size.
3. Is there a notice on all Campus publications informing users that the publications are available in alternative format, if needed for persons with disabilities?
4. Have Campus publications been reviewed to determine whether they portray persons with disabilities in a demeaning or offensive manner?
5. Has the Campus staff that creates publications or correspondence on behalf of the College been trained in the appropriate use of "person first language"?
6. Have Campus telephone information lines been examined to determine whether or not they are accessible to persons who are deaf and hard of hearing?
7. Have local resources been identified which can provide auxiliary aids for communication as needed?
8. Does the Campus use any touch screen information systems for public interaction? If yes, is there an independent operating system for persons with visual impairments?

9. If videotape is used on the Campus website or in any other District forum, is it captioned?
10. Is there a policy in place for securing video remote interpreting services (VRI)?
11. If the Public Information Officer communicates with the press and releases critical information is a sign language interpreter visible and within the screenshot if television cameras are in use, or is a captioning service used?
12. Are computers used by students, such as in libraries or study halls? If yes, are they equipped with software which makes them accessible to persons with visual impairments?
13. Are videos played in such places as waiting rooms, captioned for the public?
14. If public address systems are used, is there a component that makes the information accessible to persons who are deaf or hard of hearing?
15. When announcements are distributed electronically from the Campus are they sent out in PDF and Word documents simultaneously?
16. Given the issues noted above, are there areas where you think training of Campus facility and staff would be beneficial? If yes, please list the areas of training you have identified.

Electronic Communication

1. Are all website postings reviewed for access before they are posted?
2. Have all files on Campus public sites been reviewed for access? If such a review is planned or in progress, please discuss it.
3. Do all websites meet WCAG 2.1 standards?
4. Have any complaints been received regarding access to any Campus website?
5. Is there a text equivalent, such as an alt tag on all non-text items such as photos or graphics?
6. For multimedia presentations, are equivalent accessible alternatives used, which are synchronized with the presentation?
7. If video is used is it captioned for persons who are deaf or hard of hearing?
8. When information is conveyed in color is the same information made available without the use of color?
9. Are documents organized in order that they are readable without the need for an associated style sheet?
10. Are redundant text links provided for each active region of a server-side image map?

11. Are row and column headers identified for data tables?
12. Is markup used to associate data cells and header cells for tables that have more than two or more logical levels of rows or column headers?
13. Are frames titled with text for form identification and navigation?
14. Are all pages designed to avoid the screen to flicker with a frequency greater than 2 Hz or less than 55Hz?
15. Is the text-only page, with equivalent information and functionality?
16. Is the content of the text-only page updated at the same time the primary page is changed?
17. Is updating addressed the same way for all Campus public websites?
18. If the page uses scripting languages to display content, or create interface elements, is the information provided by the script readable by assistive technology?
19. If a web page or informational kiosk requires an applet or plug in device for access, does the required device(s) comply with Section 1194.21 of the Technical Standards for Software Operating Systems (a) through (l)?

20. If electronic forms are to be filled out on line, do they work with assistive technology?
21. Have the systems discussed in question 19 been tested by end users?
22. Is a system in place that allows screen reader users to skip navigational links?
23. Are systems in place that may time out while a person is giving a response? If yes, is there a way that the user is warned and can obtain more time without losing data?
24. Are touch screen systems in use? If yes, do they have accessible operating systems for persons who are blind? If video is used, is it captioned? Does the video contain audio descriptors?
25. If Campus Council public meetings are broadcast do they have captioning?
26. Do faculty members assign students the task of visiting their personal websites as a class requirement? If yes, how does the college address its access requirements in this situation?

Law Enforcement

1. Have the campus first responders been trained regarding the disability civil rights mandates that the College is held to under State and Federal laws?
2. If applicable, have holding and booking areas been reviewed for access since the 2010 ADA Standards for Accessible Design became effective? If visitor areas are offered, are they accessible?
3. If inmate phone systems are provided is there a phone system for inmates who are deaf or hard of hearing?
4. When arrests are made, how are service animals dealt with?
5. When arrests are made, how are medical appliances (canes, walkers, hearing aids, oxygen tanks, etc.) addressed?
6. How are power wheelchairs, scooters and other large mobility devices transported after an arrest?
7. How are medication needs dealt with after an arrest?
8. When an officer is giving information (direction or Miranda Rights) to a person with a communication related limitation, how is it determined that the person has an understanding of the information being communicated?

9. How do officers communicate with persons who are deaf or hard of hearing?

10. Does the 911 system have TTY? If yes, how often does training occur regarding its use?

11. Is there a procedure in place for officers to obtain a sign language interpreter when one is needed on an emergency basis?

12. Have officers been trained regarding the best techniques for communication with persons with disabilities and officer safety? If yes, were the following disabilities covered?
 - a. Vision Impairments
 - b. Deaf, Hard of hearing and Speech Impairments
 - c. Developmental Disabilities
 - d. Traumatic Brain Injury
 - e. Post-Traumatic Stress Disorder
 - f. Learning Disabilities
 - g. Mobility Impairments
 - h. Multiple Chemical Sensitivities
 - i. Mental Disorders
 - j. Others, please list
 - k. Competing Disabilities (i.e. someone is on the bus with a service dog and another person on the bus has a phobic response to the dog and wants it removed as an accommodation. Both have rights to be considered. The passengers are in conflict).

13. Are there other issues you think should be addressed in dealing with disability civil rights and your role within the campus? If yes, please explain.

Library Services Program Survey

1. Please briefly describe the library services program elements.
2. Has the library services program received any complaints regarding access to programs, services or activities? Please explain.
3. Are all electronic communication systems within the library services program accessible to persons with disabilities? Please explain and consider software necessary for appropriate access for persons with visual impairments, clear space in the approach to equipment, audio descriptors within videotapes for persons who are blind and captioning for persons who are deaf and hard of hearing.
4. When videotape is purchased is it purchased with captioning and audio descriptions included? Please explain.
5. Are stacks and library furniture arranged in a manner that allows access for persons who use wheelchairs? Please explain.
6. How do persons of short stature, with mobility limitations, and/or with visual impairments retrieve books from high shelves? Please explain.
7. Have library services program staff who have public access been trained in disability awareness and in the legal mandates the University is held to within the library program? Please explain.

8. How do persons with disabilities obtain library materials in alternative formats such as large print, Braille, audio recordings, and documents stored electronically?
9. How do persons with visual impairments typically conduct library research projects?
10. Does the library have an emergency management plan which includes addressing the issues relative to persons with disabilities? Please explain.
11. Does the library use electronic informational kiosks? If yes, are they accessible to persons with mobility limitations, visual impairments or who are deaf and hard of hearing? Please explain.
12. Are brochure racks and bulletin boards at an elevation that makes them usable by persons with disabilities? Please explain.
13. In the spirit of continuous improvement, what actions can you recommend that would make library services program more accessible and usable by qualified persons with disabilities?

Meeting and Event Planners

For the purposes of this survey, it is important to understand that all open meetings must be addressed. Covered meetings include, but are not limited to; class meetings, commencement, new student orientation, theatrical performances, special events, etc. Thus, we are asking you to be as inclusive as possible.

1. Is notice provided within meeting/event announcements that auxiliary aids and services (reasonable accommodations) are available as needed for persons with disabilities? This may be a statement in the class syllabus.
2. Are persons administering the meeting trained regarding the College's disability civil rights responsibilities?
3. Are meetings held on public transportation routes?
4. Are meeting sites reviewed for physical accessibility before the meeting is calendared? Note: this must include arrival points, meeting room(s), supporting restrooms, drinking fountains, public phones, registration counters, etc.
5. Are service animal relief areas identified before the meeting? This may be on a campus-wide basis.
6. Are stages, speaking platforms, microphones and other items to be used by persons with disabilities accessible? Note: When considering microphone access please take into account podium elevations, touch screen control systems, goose neck microphone attached to the center of tables without

knee clearance for wheelchair users, and persons who will not be able to handhold any equipment.

7. If video is used, is it captioned?
8. If video is used, does it contain audio descriptors?
9. Are speakers asked to read aloud all content on PowerPoint Presentations?
10. Is integrated seating made available with companion seating for wheelchair users?
11. If seating is at tables, is knee clearance space checked for wheelchair users?
12. Is high seating available for persons who have difficulty getting in and out of low chairs?
13. Is staff trained to set up meeting rooms to provide maneuvering space for persons who use wheelchairs or service animals?
14. Are FM Loop systems (Assistive Listening Devices) available for persons who are hard of hearing? If FM Loop systems are being used, do meeting hosts ensure that all comments made during the meeting go through the PA system?

15. If sign language interpreters or a real time captioner are being used, is there reserved seating at the front of the room for persons needing these accommodations?
16. Are two sign language interpreters retained for meetings or events lasting more than two hours?
17. Are sign language interpreters and real time captioning screens positioned close to the speaker?
18. Are sign language interpreters under good lighting?
19. Are sign language interpreters and real time captioners provided information before the meeting/event regarding any unusual terms or difficult to spell names that will be part of the program?
20. If speaker cards are to be used, is staff available to assist persons with disabilities, as needed in completing the cards?
21. If public comment time is limited, is the time increased for persons who have speech impairments?
22. If events include displays, are the displays accessible and on an accessible route?
23. Is the indoor or outdoor surface where persons with disabilities will travel smooth, stable and slip resistant?

24. Have transaction points been reviewed for clear space, and elevation?

25. If parts of an exhibit are inaccessible due to technical infeasibility, is video with captioning used to display the exhibit?

26. If buffet food services are part of the event, is support available as needed for persons with disabilities?

27. Does the campus have an event planning checklist to address access in meetings and event planning?

Physical Education

1. Are persons with disabilities served in their integrated setting?
2. Is adaptive equipment available for persons with disabilities?
3. Is there adequate maneuvering space around equipment to provide an opportunity for wheelchair users to approach the equipment?
4. Can course requirements be modified to provide people with physical disabilities an opportunity to complete physical education courses?
5. How is orientation provided for persons who are blind?
6. Have you received complaints regarding access? If yes, please explain and state how the matter was resolved.
7. What ADA access improvements would you recommend for the Physical Education Program?

Purchasing and Service Contracts

Introduction

This document is designed to bring up a few of the general issues related to purchasing and contracting, that relate to disability civil rights compliance in State and local government including public colleges. It is important to note that each business transaction must be analyzed on its own merit and that the issues raised here are typical, but not exhaustive.

General Conditions

1. Are all public documents related to bidding and contracting available to persons with disabilities in alternative format if needed?
2. Are meetings related to bidding and contracting held in accessible locations?

Construction and Remodels

1. Do all design contracts hold design professionals to designs that use, at minimum, the most stringent access standards in effect at the time of the project?
2. Do design contracts encourage design professionals to exceed the maximum access standards when possible to ensure that construction tolerances are built into the project?
3. Is a policy in place that mandates CASp inspections at key points of construction and at completion, before final payment is made?

4. Are major public projects reviewed by stakeholders with disabilities during the planning stage?

Service Contracts

1. Do all contracts in which the contractor will be providing programs, services or activities on behalf of your office, written in a manner that holds the contractor to the mandates of Title II of the ADA and California Government Code 11135?
2. If a recipient of programs, services or activities via service contracts believe that their civil rights have been violated what recourse is open to them?
3. How do the contract administrator and ADA Coordinator become aware of alleged civil rights violations? (Please discuss timelines and communication of facts.)

Purchase of Items Which Have Communication Elements

1. Is there a requirement in place that mandates the purchasing agent check the marketplace to determine if accessible items of the type being purchased are available?
2. Are items purchased examined to determine if they are useable by persons who are:
 - a. Blind
 - b. Have low vision
 - c. Deaf
 - d. Are hard of hearing

- e. Have learning disabilities (Consider items that do not contain time limits on their use and close down.)
 - f. Have limited dexterity (Consider items that do not require grasping, pinching or twisting.)
3. When questions come up regarding accessible communication purchases are outside resources consulted (Disability Advisory Committees, Jobs Accommodation Network, local Independent Living Center, etc.) before the purchase is made?

General Purchases

1. Prior to the purchase and if applicable, are building standards reviewed to ensure the item in question will be compliant when installed in its intended location? (Factors to consider include, but are not limited to; toilet paper dispensers must be located below the grab bar, items may not protrude more than 4" from the wall in a path of travel if they are placed at an elevation above 27" or below 80", there must be clear space available for a wheelchair user to be able to approach the item for use, an item must not require a person to reach higher than 48" or lower than 15" to operate unless the user must reach over other items to operate, then it lowers, etc.)
2. Is the operational presser required to use an item considered? (It should not exceed 5lbs.)
3. Is dexterity considered before a purchase is made? (Users must not be required to grasp, pinch or twist the device to operate it.)
4. When furniture is purchased is knee clearance for tables and clear space within a room considered?

Student/Community Services

1. Have you received complaints concerning your operation relative to disability access issues? Please explain.
2. Does your staff offer assistance in completing forms if, because of a disability such as physical, sensory, or cognitive, someone is unable to complete the forms independently? Please explain.
3. Are forms and publications available in alternative formats such as large print, Braille, audio recordings, and documents stored electronically? Please explain.
4. How do you provide auxiliary aids and services as needed for persons with disabilities?

ADA 28 CFR part 35 section 35.104 defines:

“Auxiliary aids and services includes--

(1) Qualified interpreters, note takers, transcription services, written materials, telephone handset amplifiers, assistive listening devices, assistive listening systems, telephones compatible with hearing aids, closed caption decoders, open and closed captioning, telecommunications devices for deaf persons (TDD's), videotext displays, or other effective methods of making aurally delivered materials available to individuals with hearing impairments;

(2) Qualified readers, taped texts, audio recordings, Brailled materials, large print materials, or other effective methods of making visually delivered materials available to individuals with visual impairments;

(3) Acquisition or modification of equipment or devices; and

(4) Other similar services and actions”.

Please explain.

5. Has staff been trained concerning disability etiquette awareness and person first language? Please explain.
6. Is furniture arranged and maintained in your office in a manner that provides clear space for wheelchair access or space for service animals? Please explain.
7. Are brochure racks and bulletin boards at an elevation and reach range that makes them usable by persons with disabilities? Please explain.
8. Are there any policies that your office has created to deal with disability access issues? If yes, please attach them.
9. Do you have suggestions concerning how access to your programs, services and activities could be enhanced for persons with disabilities? Please explain.
10. Does your office sponsor or host public meetings and events? If yes, please complete the questions concerning production of meetings and events.
11. Does your office have an emergency management plan which includes persons with disabilities? Please explain.

Medical Services

Introduction

The questions below represent a few common issues that persons with disabilities encounter while obtaining medical services. Each interaction with a patient or medical facility visitor will differ. It is important that they receive the same level of care provided to other persons within the health care system. If you see issues that are not addressed below, please add them as notes at the bottom of this survey.

1. Do medical facilities have a space where a wheelchair user can be examined on an examining table rather than being examined while in their chair?
2. Is assistance available, if needed, to assist the patient in transferring from their wheelchair to an examining table?
3. Can services be provided to the patient without assistance from friends or family members of the patient?
4. In instances where the patient requests a family member or friend to assist, has a medical provider been trained to speak directly to the patient, rather than directing pertinent questions to the party providing assistance?
5. Is a policy in place which ensures that the patient will be treated despite the fact it may take longer to treat them than it would other patients?
6. Are there times when patients are required to wait longer than other patients for treatment because the accessible equipment needed is in use?

7. Is a patient ever asked to use the services of a friend or family member for sign language interpreting?
8. Have all medical facilities been reviewed for physical access by a CASp certified surveyor?
9. Is the medical equipment accessible to persons with disabilities?
10. Are waiting room furnishings arranged in such a way that there is space for wheelchair users or persons using service animals to sit?
11. As a best practice, are high and wide based seating available in waiting rooms to accommodate patients that have difficulty getting out of low chairs, or who are large and may not fit into standard chairs?
12. If paging systems are used, is there a video paging component for persons who are deaf or hard of hearing?
13. Has all staff having contact with the public received disability awareness and etiquette training?
14. If health education is provided, are class materials available in an alternative format, if needed, to create access for persons with disabilities?
15. Do training videotapes have captioning for the deaf and hard of hearing and audio descriptors for the blind?

Emergencies and Office Sites

1. Has the Campus used the guidance published by the EEOC regarding a lawful means of identifying employees who might need assistance during an emergency due to their disability?
2. Are floor wardens in place to assist during an event? If yes, please respond to items 3 and 4 below.
3. Have floor wardens been trained regarding the needs of persons with disabilities in emergency situations?
4. If floor wardens are assigned the responsibility of assisting persons with disabilities, are redundancies made in the assignments? (Consider wardens who might not be in the office on the day of the event.)
5. Has the emergency plan been coordinated with the Fire Department?
6. Is there a procedure for shutting down the intake on the HVAC system, if there is a need to shelter in place, due to contamination of the air outside the building?
7. Are persons with disabilities involved in emergency plan creation, drills and debriefings?
8. In the event of an emergency evacuation, has the path of travel and assembly been coordinated with the Fire Department? (Consider Fire Department

points of arrival, staging area, areas for fire hoses, wheelchair users, distance needed from emergency site, etc)

9. How would communication be addressed during an active shooter event?
Please consider persons who are deaf or blind.
10. In response to a bomb threat, if evacuation is required, is the assembly site checked for explosives before it is populated?
11. If the event involves the need for site occupants to be decontaminated before leaving the site, is there a procedure in place to hold all parties on site until decontamination has been completed?
12. During shelter-in-place events, how are medical and medication needs addressed?
13. Can the person onsite handling the event until the Fire Department arrives, communicate with the Fire Department as they are rolling to the site?
14. Is there information available to staff regarding how to deal with various types of events? (Consider earthquake, fire, shooting, bomb threat, civil unrest, terrorist attack, etc.) If yes, has it been made available to employees, if needed, in alternative formats?
15. Is the whole site covered by fire alarms and strobe lights?
16. Are exits clearly marked?

17. Are back-up emergency evacuation chairs in place?

18. If areas of safe refuge will be in use, is there a communication system from that site to the event control center? If yes, would this system work for a deaf person?

19. Are all PA systems monitored by maintenance staff to ensure the volume is high enough to be heard throughout the intended areas of impact?

20. Are emergency evacuation chairs to be used? If yes, consider:
 - a. Has staff been trained in the use of these chairs?

 - b. If yes, did this training include information regarding the risks of transferring some persons with disabilities into and out of the chair?

 - c. Have impacted employees with disabilities been involved with the training?

 - d. What is the plan should the chair need to be used for more than one person? (Consider where the first evacuee will be left when the chair is taken back into the site for reuse.)

 - e. Have the chairs been tested in the stairwells to ensure they can operate and turn in the space available?

- f. What is the plan in the event the slow-moving chairs create a back up in the stairwell?
 - g. Are the chairs stored close to where they will be used?
 - h. Are there any barriers or locks impacting ability to obtain them when needed?
 - i. Are chair manufacturer directives, if any, followed regarding maintenance?
21. Is there a plan in place to keep people hydrated if it is necessary to hold them outside the building for a prolonged period during hot weather?
22. Do elevators have a system to communicate, if a person is trapped? If yes, will this system work for a person who is deaf or has speech limitations?
23. Has emergency management staff been trained regarding the variety of events that might occur and their impact on persons with disabilities?