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## Determining Accessibility in Your National Service Program

A site, facility, work environment, service, or program is ACCESSIBLE when it is easy to approach, enter, operate, participate in, and/or use safely and with dignity by every individual. This document addresses two types of accessibility: programmatic and environmental.

**Programmatic accessibility** includes:

- Determining essential service functions;
- Providing reasonable accommodations;
- Asking appropriate interview questions;
- Considering the variety of learning styles that might be represented at a training event.

**Environmental accessibility** refers to:

- Removal of architectural barriers that may exist in buildings, outdoor spaces, and other facilities.

National Service programs must conduct an accessibility self-evaluation which is required by [45 CFR 1232.7\(c\)](#), “Nondiscrimination on Basis of Handicap in Programs or Activities Receiving Federal Financial Assistance”. The regulation states:

“Each recipient shall, within one year of the effective date of this part, conduct a self-evaluation of its compliance with Section 504, with the assistance of interested persons, including handicapped persons or organizations representing handicapped persons. Each recipient shall with the assistance of and consultation with interested persons, including handicapped persons, evaluate its current policies, practices and effects thereof; modify any that do not meet the requirements of this part; and take appropriate remedial steps to eliminate the effects of any discrimination that resulted from adherence to these policies and practices.”

National Service programs can use the following checklists to evaluate their programmatic and environmental accessibility. A good self-evaluation will capture both strengths and weaknesses. This information should lead to the development and implementation of a concrete internal action plan that specifies any identified barriers and places a timeline on their removal.

The following checklists are provided to assist with determining programmatic and environmental accessibility:

- Recruitment, Interviewing, and Accommodation Practices
- Communications Accessibility
- Physical/Environmental Accessibility
- General Non-Discrimination

The following steps are recommended:

- Complete the checklists and maintain all documents on file;
- Develop and implement an internal action plan to rectify any identified issues/barriers;
- Regularly review and update the internal action plan.

If you would like assistance completing these evaluations and/or addressing any identified issues, please contact **Jillian Ober** at **The OSU Nisonger Center** at [Jillian.Ober@osumc.edu](mailto:Jillian.Ober@osumc.edu) or (614) 685-6718.

## Checklist I. Recruitment, Interviewing, and Accommodation Practices

1. Are people with disabilities regularly included in your applicant pool?  
Yes  No
2. Has your program proactively sought to recruit and retain qualified volunteers/members with disabilities?  
Yes  No
3. Has your program forged partnerships with local disability organizations for the purpose of recruiting volunteers/members, as well as consulting on other best practices?  
Yes  No
4. Has your program participated in disability related conferences and job/resource fairs for people with disabilities?  
Yes  No
5. Does your program emphasize the benefits of National and Community Service for people with disabilities as part of its outreach plan?  
Yes  No
6. Do recruitment materials, including photos and ad copy, contain active, positive images of people with disabilities?  
Yes  No
7. Do recruitment and other program materials include a statement regarding the program's commitment to inclusion of people with disabilities?  
Yes  No

Sample: [Organization] is committed to the inclusion of employees and volunteers/members with all levels of ability. Anyone who feels s/he may need an accommodation based on the impact of a disability should contact (name of contact person) at (telephone/TTY number) privately to discuss your specific needs.

8. Do you have a written policy regarding non-discrimination on the basis of disability?  
Yes  No

Visit the [EEOC website](#) for more information.

9. Do you regularly review recruitment practices to be certain that you, your supervisors, or external consultants are nondiscriminatory in the treatment of applicants and volunteers/members?  
Yes  No

10. Are service descriptions in writing?

Yes

No

The ADA does not require written service descriptions; however, detailed service descriptions can be very useful in determining whether or not an applicant is qualified.

11. Have service descriptions been analyzed to determine which functions of a volunteer's service are 'essential' and which are 'marginal'?

Yes

No

What's essential?

- Position exists to perform a specific function
- Limited number of others who can do the function
- Function is specialized; person selected because of expertise

What's marginal?

- Are preferential or secondary to essential functions
- Can be traded or done by another volunteer

Note, essential functions can be done with or without reasonable accommodations.

12. Have *all applicants* been informed that they are entitled to reasonable accommodations?

Yes

No

13. Do your interview questions address an applicant's ability to perform essential position functions *without asking about disability*?

Yes

No

14. Is staff aware of what questions can and cannot be asked in an interview?

Yes

No

Allowable questions:

- Are you able to perform the essential functions of this job, with or without reasonable accommodations?
- Can you describe how you would perform the following job functions (followed by a list of job duties)?

Prohibited questions:

- Do you have a disability?
- Do you have any physical or mental impairments that might limit your job performance?
- Have you ever collected workers' compensation?
- What can you tell me about your disability?

Questions should be task-related and focused on performance of job duties. Refrain from asking about an applicant's physical and/or mental condition, medical history (including past drug/alcohol abuse), or prior worker's comp or health insurance claims.



22. If a *provided* accommodation differs from the volunteer's *preferred* accommodation, do program staff ensure the accommodation provided is equally as effective as the volunteer/member's preference?  
Yes  No
23. Is there a grievance procedure for denial of reasonable accommodation requests?  
Yes  No
24. Are interviews, training sessions, and staff meetings held in accessible locations? (See Checklist III for physical accessibility considerations)  
Yes  No
25. Are off-site trainings, holiday parties, picnics or other gatherings held in accessible locations?  
Yes  No
26. Are reasonable accommodations (including sign language interpreters, written materials in alternate formats, wheelchair accessible tables, etc.) provided to people with disabilities at off-site meetings, trainings, and social events?  
Yes  No

## Checklist II: Communications Accessibility

Communication access refers to the way information is transmitted and received. Title III of the ADA requires the provision of auxiliary communication aids and services to people with disabilities impacting their ability to see, hear, speak, or receive, process, and transmit information. Auxiliary communication aids and services include qualified sign language interpreters and communication devices for person who are deaf or hard of hearing, qualified readers, taped texts, Braille, closed captioning, or other devices/services.

1. As a matter of practice, is training and meeting content presented audibly, visually, and experientially in order to accommodate for different learning styles? (Can volunteers/members look, listen, and “do” during trainings and meetings?)  
Yes  No
2. Can information that is communicated visually (i.e. brochures, applications and enrollment forms, handbooks, DVDs, posters, printed directional signs, etc.) be provided in alternate formats (i.e. electronic, large print) if requested?  
Yes  No
3. Do supervisory staff know how to get written material:
  - Transcribed into Braille Yes  No
  - Printed in large print Yes  No
  - Recorded onto audio cassette Yes  No
  - Placed on an ASCII\* disk/cd Yes  No

*\*ASCII codes represent text in computers, communications equipment, and other devices that use text.*

Most material will have accompanying electronic files. Save the files so that visually impaired people can use screen reading software, if necessary.

4. Can information that is communicated verbally be provided in an alternate format if requested?  
Yes  No
5. Does the program inform volunteers/members that auxiliary aids and services are provided upon request?  
Yes  No
6. Is there a procedure for deciding which auxiliary aids and service to provide?  
Yes  No

It is good practice first ask the volunteer which auxiliary aid or service has worked best for him/her in the past.

7. If a *provided* communication aid differs from the volunteer’s *preferred* aid, do program staff ensure the aid provided is equally as effective as the volunteer’s preference?  
Yes  No

8. Does supervisory staff know how to secure a sign language interpreter, if necessary?  
Yes  No
9. Can business cards be printed in Braille and/or large print?  
Yes  No
10. As a matter of practice, are microphones used in large meetings (more than 25 people)?  
Yes  No
11. Can an individual with a hearing or speech impairment access a TTY/TDD phone system at your site?  
Yes  No

A TTY/TDD (text telephone) is a device that allows individuals with hearing or speech impairments to communicate over the phone. TTYs (Teletypewriter Phone System) and TDDs (Telecommunication Device for Deaf Persons) are different names for the same things. The abbreviation TTY is preferred by most users of these devices.

12. If so, have staff and volunteers/members been trained to use a TTY/TDD?  
Yes  No
13. If your program does not have a telephone equipped with a TTY/TDD do volunteers/members and staff know how to use the Ohio Relay Service?  
Yes  No

Ohio Relay Service allows communication between TTY devices and telephones (voice). If you do not have access to a TTY, you can call Ohio Relay Service and they will transmit the message for you. For more information, visit [Ohio Relay Service](#).

It is also important to note that numerous software programs have been developed to serve the same function as the TTY. Many previous users of TTYs now prefer to use such software.

14. Is there a mechanism for ensuring that people who are deaf or hearing impaired are aware of an activated smoke or fire alarm? (also addressed in Checklist III)  
Yes  No
15. Does your program have its own website?  
Yes  No
16. If your program has its own website, is your site accessible to people with disabilities (e.g. including "text-only" versions for people with visual impairments)?  
Yes  No

Review the [Web Content Accessibility Guidelines](#) or visit the [State of Ohio IT Policy – Website Accessibility](#) for more resources and information related to ensuring accessibility.

### Checklist III: Physical/Environmental Accessibility

In general, the best way to determine environmental accessibility is to ask people with disabilities (i.e. people with mobility limitations, people with low vision) to visit and maneuver in and around your facility. If barriers are discovered, there are often simple and inexpensive accommodations that can address the barrier(s); physical changes to a building are only required when there is no other feasible way to make the program accessible.

1. Are there accessible parking signs and spaces with necessary access space for vans with lifts?  
Yes  No
2. Are curb ramps provided wherever an accessible route crosses a curb?  
Yes  No
3. Do you have a notice posted on your front door indicating that assistance will be provided for people with disabilities?  
Yes  No
4. Is there an accessible entrance to your building for people with mobility impairments (i.e. a person who uses a wheelchair)?  
Yes  No
5. If there is a separate entrance to your office after entering the building, is that entrance accessible?  
Yes  No
6. If the accessible entrance is not immediately apparent, are there directional signs?  
Yes  No
7. Is the entrance to your building on an even hard surface without steps?  
Yes  No
8. Do ramps at door entrances have adequate maneuvering clearances for a person using a wheelchair?  
Yes  No

<p>A person in a wheelchair needs 36 inches of clear width for forward movement, and a 5-foot diameter or T-shaped clear space to make turns. A minimum distance of 48 inches clear of the door swing is needed between the two doors of an entry vestibule.</p>
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9. Do doorways have a minimum clear opening of 32 inches?  
Yes  No
10. Are doors equipped with accessible handles (operable with a closed fist) that are 48 inches high or lower?  
Yes  No

11. Are accessible meeting rooms available?  
Yes  No
12. Are microphones accessible and flexible in meeting rooms?  
Yes  No
13. Does the building have accessible restrooms, phones, and water fountains?  
Yes  No
14. If volunteers/members must use more than one floor of your facility, is there an elevator or chair lift to allow volunteers/members with mobility impairments to move between floors?  
Yes  No
15. Do elevator panels and restroom signs include Braille?  
Yes  No
16. Are there desks and meeting tables with movable seating to accommodate wheelchairs?  
Yes  No
17. Do those desks and tables have a clear opening for knee space of at least 27 inches in height, 30 inches in width, and 19 inches in depth?  
Yes  No
18. Has staff received instructions and training on procedures for assisting and evacuating persons with disabilities during an emergency?  
Yes  No
19. Have staff and members participated in an evacuation drill?  
Yes  No
20. Are all audible alarms accompanied by visual alarms?  
Yes  No

## Checklist IV: General Non-Discrimination Checklist

The first three checklists examine how well programs ensure non-discrimination for *applicants and volunteers/members* with disabilities. In addition, federal requirements indicate that members of the *general public* may not be discriminated against on the basis of a disability. National Service programs must provide *equal access to program services* for persons with disabilities. For example, a National Service program may not exclude a qualified child with a disability from an after-school literacy program on the basis of the child's disability.

1. Have volunteers/members and staff received disability awareness training that includes information about the Americans with Disabilities Act of 1990?  
Yes  No

For more information on the ADA, see [Title III of the ADA](#) and [A Guide to Disability Rights Laws](#). You may also contact The OSU Nisonger for disability inclusion training at [Jillian.Ober@osumc.edu](mailto:Jillian.Ober@osumc.edu) or (614) 685-6718.

2. Are there any circumstances when a person with a disability would be prohibited from receiving services from your program?  
Yes  No

If yes, please describe:

3. Are there instances when people with disabilities are provided services in a separate or segregated setting?  
Yes  No

If yes, please describe:

4. Are people with disabilities ever charged an extra fee for program accommodations, auxiliary communication devices, or other modifications?  
Yes  No

If yes, please describe:

5. Are there any circumstances when a person with a disability would receive a lesser or different benefit than a person without a disability?  
Yes  No

If yes, please describe:

Is there a way to equalize the benefit?

6. Are program staff and volunteers/members authorized and equipped to make reasonable accommodations to policies and procedures when necessary *so that persons with disabilities can receive services and/or benefit from the program*?  
Yes  No
7. Has your program notified *outside contractors of services* of their obligation to comply with your level of responsibility under the ADA for accessibility and accommodation?  
Yes  No

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