



**STATE OF HAWAII**

**DEPARTMENT OF HUMAN SERVICES**

## **Self-Evaluation Plan**

**Title II of the Americans with Disabilities Act (ADA)  
Programs, Services and Activities**

**ISSUED AND APPROVED**  
by the Director  
Department of Human Services

A handwritten signature in black ink, appearing to read "Patricia McManaman", is written over a horizontal line.

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**Effective August 1, 2014**

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## Executive Summary

This Self-Evaluation Plan is a voluntary effort to comply with Title II of the Americans with Disabilities Act, As Amended (ADAAA) at the Hawaii Department of Human Services (DHS). Purposes of the plan include, and are not limited to: 1) identifying services, policies, and processes that need attention; 2) maintaining compliance with ADAAA relative to State-owned and leased facilities; 3) assuring communication access and emergency warning provisions for disabled individuals; and 4) updating and disseminating ADA notices and policies regarding improving access to programs, services and activities as well as preventing discriminatory practices.

This two-year plan (August 1, 2014-July 31, 2016) is general in nature to allow for flexibility in provision of services as well as to allow for changing needs and requirements. More specific details and objectives are provided on an annual basis to DHS Divisions, Administratively Attached Agencies and Commissions. In summary, some preliminary self-evaluation activities continue as follows:

- ✓ Involve persons with disabilities in access discussions
- ✓ Update programs, services and activities for access, and compliance purposes
- ✓ Inform and train sub-recipients
- ✓ Distribute annual Director's Internal Communication (ICF) on non-discrimination policies
- ✓ Refresh Task Force Representation regularly
- ✓ Remind supervisors and staff of their role in providing auxiliary aids and modifications on a timely basis
- ✓ Monitor capabilities of staff in using and offering assistive devices
- ✓ Monitor and inform about emergency evacuation procedures for persons with disabilities in State-owned and leased buildings
- ✓ Collect data as required to support integration of individuals with disabilities and/or language barriers into programs, activities and services
- ✓ Develop and educate staff in policy and procedure changes
- ✓ Conduct site visits for facilities and language assessment purposes
- ✓ Submit Civil Rights Report to USDA, Office of Civil Rights, (OCR) as follow-up to SNAP management evaluation process, as required.

DEPARTMENT OF HUMAN SERVICES  
PROGRAMS, SERVICES, AND ACTIVITIES

**Self-Evaluation Plan**

August 1, 2014—July 31, 2016

**Introduction**

**Purpose of Self-Evaluation**

State and local governments are required to conduct self-evaluations of services, policies and practices, in accordance with Title II of the Americans with Disabilities Act, As Amended (ADAAA), 42 U.S.C., Section 12101. The purpose of self-evaluation is to identify services, policies and practices that might not comply with Title II requirements, and to correct any discrepancies to bring an entity into compliance.

A Civil Rights Compliance Review conducted by the Office of Civil Rights Food and Nutrition Service (FNS) of the U. S. Department of Agriculture (USDA) in 2010 focused on six key areas. A management evaluation by USDA was completed in February and March of 2014 as well. As a part of the SNAP Management Evaluation Plan, the Department of Human Services, (DHS) Civil Rights Compliance Staff, provides a progress report to USDA, Office of Civil Rights as requested. The focus of that report includes the following six areas:

1. Annual Civil Rights Training
2. Unannounced Site Visits
3. Policies and Services for Limited English Proficient (LEP) Clients
4. Building and Program Accessibility for Persons with Disabilities
5. Public Notifications and Procedures related to Filing Discrimination Complaints and Processes for Tracking Service Delivery Complaints
6. Collection of Data on the Limited English Proficient Populations in the Hawaii service areas

**Non-Discrimination Statement**

It is the policy of the State of Hawaii that no qualified individual with a disability is excluded from participation in, denied the benefit of, or is otherwise subjected to discrimination by any program, service or activity of the State on the basis of disability. This is also supported by the Department of Human Services (DHS) Policy and Procedures 4.10.3 (Appendix A) and 4.10.4 (Appendix B).

Joint non-discrimination statements appear on DHS websites and are available in ten languages. Additionally, USDA's non-discrimination statement appears on the DHS website in the Civil Rights Corner <http://humanservices.hawaii.gov> in three languages. Public notices are posted in waiting rooms, such as the USDA's, 475B notice.

In keeping with the above policies and statements, DHS is committed to providing an equal opportunity for all persons to participate in its services, programs and activities. This commitment is reflected in Director's Memorandum 14-01, dated January 6, 2014 (Appendix C), an internal communication informing staff of the department's responsibilities.

The Department's non-discrimination statement, all related directives, memoranda, and public notices, apply to all Divisions, as well as its two administratively attached agencies and two commissions. The Hawaii Public Housing Authority (HPHA), an administratively attached agency which has considerable autonomy, has taken additional measures to ensure that the public is informed of its commitment to non-discrimination specifically in public housing under the Fair Housing Act.

Although the DHS provides an equal opportunity to participate in its services, programs and activities, persons who believe they have been discriminated against may file a discrimination complaint in accordance with the Departmental Discrimination Complaint Policy and Procedures (4.10.1) (Appendix D).

#### Designation of ADA Coordinator

The DHS Civil Rights Compliance Staff is the designated ADA Coordinator for the department. Questions, complaints and/or concerns may be routed to:

|                               |         |                       |
|-------------------------------|---------|-----------------------|
| DHS – Personnel Office        | E-mail: | gwatts@dhs.hawaii.gov |
| Civil Rights Compliance Staff | Fax:    | (808) 586-4990        |
| P. O. Box 339                 | Phone:  | (808) 586-4955        |
| Honolulu, Hawaii 96809-0339   |         |                       |

Additionally, Hawaii Public Housing Authority ADA Coordinator, Kiriko Oishi, can be contacted at: [Kiriko.U.Oishi@hawaii.gov](mailto:Kiriko.U.Oishi@hawaii.gov)

|                                      |        |                |
|--------------------------------------|--------|----------------|
| The Hawaii Public Housing Authority  | Phone: | (808) 832-4680 |
| 1002 North School Street, Building J | Fax:   | (808) 832-3866 |
| Honolulu, Hawaii 96817               | TDD:   | (808) 832-3817 |

#### **Self-Evaluation Process within the Department**

##### Key Activities

An ACCESS Task Force, composed of representatives from the various programs and staff offices, was organized to assist the ADA Coordinator in the self-evaluation process and other compliance activities. The vision, mission and standards of services are provided in Appendix I. Task Force representation is refreshed annually. The following areas are represented on the ACCESS Task Force:

- Administrative Appeals Office (AAO)
- Benefit, Employment and Support Services Division (BESSD)
- Civil Rights Compliance Staff (CRCS)
- Division of Vocational Rehabilitation (DVR)

Hawaii Public Housing Authority (HPHA)\*  
Limited English Proficiency Project Manager (DIR)  
Med-QUEST Division (MQD)  
Office of Youth Services (OYS)  
Social Services Division (SSD)

\*In addition to being part of the DHS' ACCESS Task Force, the HPHA Representative coordinates the internal self-evaluation process, which includes obtaining feedback from staff involved in providing programs, services and activities to the public and who are responsible for HPHA facilities under the Fair Housing and Rehabilitation Acts.

The key activities of the DHS ACCESS Task Force relative to the self-evaluation process include, but are not limited to:

Meeting semi-annually to consider changes/improvements  
Procedures and practices review  
Dissemination of ADA Notice and Self-Evaluation Plan  
Plan of action for practices relative to access  
Providing suggestions for addressing areas of non-compliance  
Collecting and analyzing relevant population data

#### Involvement of People with Disabilities

Persons with disabilities are involved in the self-evaluation process at various levels. Within the Department, employees with disabilities are invited to participate in compliance activities. To obtain input from external organizations, this Self-Evaluation Plan will be made available to the following organizations that are responsible in some way for providing services to persons with disabilities.

- Disability and Communication Access Board, Hawaii Department of Health
- Ho'opono Services for the Blind Branch, DVR, DHS
- Aloha State Association of the Deaf, Honolulu, Hawaii
- U. S. Department of Agriculture, Office of Civil Rights, Region IX

Frequent attempts are made to involve persons with disabilities to access discussion.

#### **Programs and Services**

The DHS offers a wide range of state and federally funded programs and services to the public through four divisions, two administratively attached agencies, and two commissions. Such programs and services include, but are not limited to, welfare assistance (financial and SNAP benefits), employment and training, child care, medical assistance, child welfare services, adult protective and community services, vocational rehabilitation, public housing, and youth services. A state-wide Commission on the Status of Women (CSW) and the Hawaii State Commission on Fatherhood are also under the DHS.

## Description of Programs and Services

### 1. Benefit, Employment and Support Services Division (BESSD)

The mission of BESSD is to help economically disadvantaged persons attain self-sufficiency. In an effort to achieve this, BESSD administers Financial Assistance, Supplemental Nutrition Assistance Program, and Employment and Training Services. The Division also provides Child Care Connection Reimbursement services for families in which the parent(s) is/are employed or in training. The Homeless Program, transferred to BESSD from HPHA in 2010, solves problems and provides assistance to homeless individuals in Hawaii.

### 2. Med-QUEST Division (MQD)

The mission of Med-QUEST (MQD) is to provide the overall management of the plans, policies, regulations and procedures of the Division's medical assistance programs, public information, staff and clerical assistance and support services; to develop and maintain working relationships with health plans, providers, Federal and State authorities, community agencies, client advocacy groups and others. This Division is also responsible for providing home and community-based support services to disabled children and adults.

### 3. Social Services Division (SSD)

SSD administers the Child Welfare Services Branch, commonly known as Child Protective Services (CPS) and the Adult Protective and Community Services Branch (APCSB), commonly known as Adult Protective Services (APS). Working with the Office of Information Technology, the APCSB is listing its APS e-mails on its APS Reporter Form to promote reporting from the public who are hearing impaired and as another means to report abuses against the disabled and/or elderly.

### 4. Division of Vocational Rehabilitation (DVR)

DVR is divided into the following programs:

- a. Vocational Rehabilitation – provides services to eligible individuals with disabilities to become productive members of Hawaii's workforce.
- b. Ho'opono, Services for the Blind - provides services to eligible blind, deaf/blind and visually-impaired individuals which include vocational rehabilitation, adjustment classes, public education and blindness prevention activities. Ho'opono also maintains a statewide blind registry.
- c. Disability Determination - determines disability for Social Security Disability Insurance and Supplemental Security Income benefits.

5. Hawaii Public Housing Authority (HPHA), administratively attached to DHS

The HPHA administers federal and state public housing and rental subsidy programs and other miscellaneous rental programs. The primary service of these programs is providing safe, decent and affordable housing to low income families.

6. Office of Youth Services (OYS), administratively attached to DHS

The OYS was established by legislature in 1989 and administratively placed within DHS. The OYS provides and coordinates a continuum of services and programs for youth-at-risk to prevent delinquency and reduce the incidence of recidivism. The OYS also strives to provide a clear sense of responsibility and accountability for all youth services in Hawaii. Although a core responsibility of the OYS is to manage and operate the Hawaii Youth Correctional Facility (HYCF), the agency places great emphasis on providing and supporting "front end" prevention, diversions, and intervention services.

The OYS focuses on programs that address youths' needs from prevention to incarceration and aftercare. The OYS administers the following programs and service through Purchase of Service (POS) providers who are contracted by the OYS: Positive Youth Development, Non-School Hours Programs, Youth Gang Prevention and Intervention, Truancy Prevention, Outreach and Advocacy, Education/Vocation Services, Homeless Youth Services and Community-Based Residential Services.

The HYCF insures public safety by providing programs and services that work toward successful reintegration of incarcerated youths within a safe, secure and just environment, which promotes adolescent development.

7. Commission on the Status of Women (CWS)

This administratively attached commission is a two-person office providing services specific to the needs and status of women.

8. Hawaii State Commission on Fatherhood

The mission of the Hawaii State Commission on Fatherhood is to promote healthy family relationships between parents and children by emphasizing the important role fathers play in the lives of their children. The Commission serves in an advisory capacity to state agencies and makes recommendations on programs, services, contracts, policies, and laws relating to children and families.

Support Services

Six staff offices provide support services to the aforementioned divisions, administratively attached agencies and commissions: 1) Administrative Appeals Office, 2) Fiscal Management Office, 3) Office of Information Technology, 4) Budget, Planning and Management Office, 5) Audit, Quality Control and Research Office, 6) Personnel Office. Of these, the Administrative Appeals Office (which conducts administrative hearings for clients), and the Personnel Office (which provides employment services), maintains public contact on a regular basis.



Programs, services and activities are updated as needed for access and compliance purposes.

Officials Responsible for Programs and Services

The following is a list of officials responsible for the planning, preparation, coordination and delivery of programs, services, and activities under their supervision:

DHS Director

Patricia McManaman

Deputy Director

Barbara A. Yamashita

Division Administrators

BESSD  
Pankaj Bhanot

DVR  
Albert Perez

MQD  
Dr. Kenneth Fink

SSD  
Mona Maehara

Agency Executive Directors

HPHA  
Hakim Ouansafi

OYS  
David Hipp

Commission Executive Directors

CSW  
Catherine Betts

FATHERHOOD  
Barbara A. Yamashita, Acting

**Self-Evaluation Process for Programs and Services**

Equal Opportunity to Participate and Benefit

The ADAAA states that a public entity: 1) may not deny a qualified individual with a disability an opportunity to participate and benefit from any program; 2) may not afford an opportunity that is not equal to or not as effective as that provided others; and 3) may not impose eligibility criteria for participation in programs that screen out people with disabilities either directly or indirectly, unless such criteria are necessary for the provision of the program's activities or services.

As indicated previously in the Description of Programs and Services, DHS provides a wide range of programs, services, and activities to the public and is a public entity. Although said programs, services and activities are designed and administered to serve all individuals equally, there may be circumstances in which participation of a person with a disability may be excluded or restricted. However, DHS believes that these exclusions and/or restrictions are necessary either to the operations of a program, or to ensure the safety of program participants, and does not discriminate against persons with disabilities. The following identifies examples of DHS programs that may result in necessary exclusions or restrictions:

The Child Care Connection, Hawaii's licensing requirements for child care providers contracting with the DHS, may restrict or exclude the participation of certain individuals with disabilities. The provision child care, usually for children not yet school age, requires the provider to be able to meet all the health and safety needs of the children in their care. For example, a provider must be able to carry infants/toddlers and escort older children out of a home and/or facility without assistance.

If persons with disabilities can demonstrate that they are able to meet all health and safety requirements, as well as other eligibility criteria, they will not be denied an opportunity to become licensed.

The MQD currently administers two major medical assistance programs: The Hawaii QUEST Program and the QUEST Expanded Access (QExA) program. The DHS is moving to QUEST Integrated, which will collapse these two programs to one. Currently, the QExA program is designed to better integrate and deliver health care to individuals who are sixty-five years or older, blind, or certified as disabled by the Social Security Administration or by the State, who may have more complex needs or community-based services requiring a greater degree of coordination. Accordingly these individuals are directed to the QExA program and are ineligible to participate in the Hawaii QUEST program. For an update on the MQD KOLEA Project, please see Appendix K.

The SSD is sometimes presented with circumstances when participation of persons with disabilities may be excluded or restricted. For child welfare services, the choice of foster homes for children with disabilities may be restricted to those homes where the family is properly trained to care for these children. Additionally, foster home certification criteria may exclude certain prospective foster parents with disabilities, if they are unable to demonstrate how they would care for the needs of children. In both instances, the exclusions or restrictions are necessary for the health and safety of all involved parties.

A person with a disability may be excluded from participating in an adult day care program, if the nature of the disability is such that the person would be better served through another program. A skilled nursing or intermediate care facility, rather than an adult day care, for example, may be a better choice for a severely disabled individual. Again, this exclusion is necessary to the health and safety of the participants.

The DVR is unique in that all of its programs and services are designed to assist persons with disabilities. However, because participation is contingent upon the nature of a person's disability, there may be circumstances where an individual may be excluded or restricted from participation in any given program. For example, eligibility requirements set forth by the Rehabilitation Act and the Social Security Act may exclude ineligible persons from participation in the Vocational Rehabilitation employment and training services. The exclusion of such individuals is necessary to comply with federal requirements. To disregard these requirements may fundamentally alter the nature of the programs and result in fiscal sanctions or loss of federal funding.

In its public housing programs, HPHA provides accessible housing units to eligible tenants with disabilities (i.e., mobility impaired, and hearing and visually impaired). Hawaii Administrative Rules, Section 17-2028-40, "Occupancy of Accessible Units" outlines procedures for filling said units.

Services provided by the HYCF could identify circumstances when youth with disabilities may be restricted from participation in a "work line." For example, a youth who has a mobility impairment may be restricted or excluded from working on the HYCF's ranch. However, the youth may be assigned to other work activities, such as performing work in an office setting. The exclusion or restriction is necessary for health and safety reasons.

### Reasonable Program Modifications

Public entities are required to make reasonable modifications to policies or practices in order to avoid discrimination towards people with disabilities. A modification is not required, however, if it would fundamentally alter the nature of the program or activity.

The DHS recognizes that training is necessary for staff (who have direct contact with the public) to be properly trained in accepting and processing requests for reasonable accommodations and modifications. The Department informs and trains sub-recipients upon request.

Although most programs have informal processes for modifying their practices, a formal procedure consistently applied throughout the Department is designed to address the needs of persons with disabilities. This assures that all staff are aware of the Department's obligation to provide modifications and how to respond to requests. However, responding to requests for modifications may differ by division on a case-by-case basis.

The DVR has an established practice for providing program modifications to clients with disabilities. Essentially the DVR notifies the public of the availability of program modifications upon request through public meeting notices, appointment letters, and telephone contacts, and is otherwise open to provide modifications that would effectively meet the needs of an individual, taking into consideration his/her preference. For example, when a cognitively impaired client or applicant is unable to complete necessary paperwork, arrangements are made by DVR staff to ensure that proper assistance is provided.

The Eligibility Workers of the income maintenance and medical assistance programs administered by the BESSD and MQD, respectively, are advised and are aware that office eligibility interviews, which are normally required, may be waived for persons with disabilities. If participants are unable to come to the office, alternative methods of interviewing are practiced. For instance, telephone interviews, home visits, or interviews with an authorized representative are regularly conducted to ensure that persons with disabilities are provided an equal opportunity to participate in programs and services.

In public housing, the HPHA makes reasonable accommodations to enable persons with disabilities to have an equal housing opportunity. Similar to the BESSD and MQD, eligibility reviews that are normally conducted in person at various HPHA offices or housing units can be conducted by telephone, with an authorized representative, or at an off-site location that is convenient to both parties, including at the client's residence. In addition, modifications to a building or unit may be provided to allow better access to the facilities, such as adding a ramp or widening a doorway.

Understanding that very few youth with disabilities are committed to the HYCF, the OYS modifies work and recreational programs, when necessary to allow participation of such youth. For example, if youth with a mobility impairment were unable to participate in a recreational activity, the OYS would engage in finding alternative activities for that youth. Similarly, for work programs, modifications are made to allow participation by a youth with a disability in the most integrated setting possible.

A departmental "Equal Opportunity to Services" Notice informs participants that the DHS can make modifications to their program to accommodate individuals. It informs clientele that the DHS will provide sign or other language interpreters and information in alternate formats. The DHS distributes annually Director's Internal Communication Form (ICF) on non-discrimination policies.

#### Surcharges and Additional Requirements

Public entities may not impose extra charges upon people with disabilities to cover the costs of effective communication, program modifications, or access features, and may not impose any additional requirements or burdens on people with disabilities that they do not require of all other participants in the program.

For all DHS programs, services and activities, there are no circumstances in which persons with disabilities would be asked to pay a fee or meet any other requirements not imposed on other program participants.

#### Integrated Settings and Separate Programs

Separate programs or activities are permitted only when necessary to ensure equal opportunity. When separate programs are provided, qualified people with disabilities cannot be excluded from participating in regular programs.

It is departmental policy that participants of DHS programs, services and activities shall not be denied the opportunity to participate in a regular (integrated) program even though another separate program may exist and may be more appropriate.

As mentioned previously, all DVR participants are people with disabilities. Separate programs, services and activities exist to fulfill the varied needs of such individuals. For example, certain disabilities may require special services, such as sign language interpreters, readers, Braille materials, etc., to ensure equal access to programs and services. In addition, the Randolph-Sheppard Act gives priority to persons who are blind to operate vending facilities on Federal property. Similarly, the Hawaii Revised Statutes, Section 102-14, authorizes persons who are blind and visually impaired to operate vending facilities and machines in State or County public buildings.

While most youth attend school and participate in classroom activities, the HYCF occasionally will request tutoring for youth in their living quarters when it is determined that their disruptive behavior is detrimental to the rest of students in the classroom. Olomana School at HYCF provides tutoring for those students on restriction due to disruptive classroom and/or module behavior. Once students are able to maintain safe and appropriate behavior they are reintegrated back into the regular educational setting.

## Contracting with External Organizations

When a public entity contracts with other organizations to provide programs and services to the entity's constituents, the public entity retains responsibility for ensuring that the contractor provides the services and activities in a non-discriminatory manner consistent with the requirements of Title II and other Federal regulations. The DHS regularly monitors sub-contractors.

An extensive number of contractors currently provide services on behalf of DHS and its attached agencies and therefore, we have elected not to list them in this document. However, for specific information regarding contracts within the various programs, inquiries may be made with the DHS Civil Rights Compliance Office at the address and phone number listed above. All DHS non-bid contracts shall contain the following language:

"No person performing work under this Agreement, subcontractor, employee, or agent of the CONTRACTOR, shall engage in any discrimination that is prohibited by any applicable federal, state or county law."

Furthermore, standard language requiring contractors to comply with the law, shall read as follows:

"The CONTRACTOR shall comply with all federal, state, and county laws, ordinances, codes, rules and regulations, as the same may be amended from time to time, that in any way affect the Contractor's performance of this Agreement."

The OYS provides services exclusively through Purchase of Service (POS) contracts. Included in their contracts is a section entitled "General Conditions for Health and Human Services Contracts" (AG Form 103F, General Conditions) which includes the following language:

### 1.3 Compliance with Laws

1.3.3 Persons with Disabilities. The PROVIDER shall implement and maintain all practices policies and procedures required by Federal, State, or County law, including, but not limited to the Americans with Disabilities Act (942 U.S.C. 12101, et seq.) and the Rehabilitation Act (29 U.S.C. 701, et seq.)

1.3.4 Nondiscrimination. No person performing work under this Contract, including any subcontractor, employee, or agent of the PROVIDER, shall engage in any discrimination that is prohibited by an applicable Federal, State, or County law.

The HPHA contracts with private property management companies to operate many State and Federal public housing projects. To ensure that contractors are aware of their obligation under the law, HPHA provides training on Section 504 of the Rehabilitation Act.

BESSD's Homeless Branch staff received ADA (Title II and III) training from the State Commission on Persons with Disabilities to enable them to monitor their contracted service providers.

Although contractors are informed of their obligation to comply with all Federal, State and County laws, the DHS believes that compliance with the ADA should be discussed directly with the contracting agent/s to ensure understanding of their obligations. Furthermore, DHS shall ensure staff that monitor the contracts for compliance have full knowledge of ADA requirements.

The Fiscal Management Office shall periodically review DHS contracts to incorporate more specific language relative to compliance with the ADA and other civil rights laws, rules and regulations, including, but not limited to, inclusion of specific assurances appropriate to the respective funding entities.

### Procurement Contracts

In selecting procurement contractors, a public entity may not discriminate on the basis of disability. There should be no circumstances in which consideration related to disability would influence the choice of a procurement contractor. Program Contract Monitors must assure that this does not happen.

### **Communication Access**

The State of Hawaii shall ensure that all individuals with disabilities have communication access to programs, services and activities of the State, which are equally effective as that provided to individuals without disabilities. Departments and agencies of the State of Hawaii shall provide specific communication access in the form of auxiliary aids or services upon the request of a qualified individual with a disability. It is also State policy that a request must be received five to seven days prior to the date of an event that an auxiliary aid or service is needed. (Please see Appendix J for updated Request for Auxiliary Aid Form.)

### Auxiliary Aids and Services

In keeping with the aforementioned policy, the DHS provides the following auxiliary aids and services upon request by a qualified individual with a disability:

| <u>Visual</u>     | <u>Hearing and Speech</u>  | <u>Cognitive</u>      |
|-------------------|----------------------------|-----------------------|
| Large Print       | Sign Language Interpreters | Signage               |
| Readers           | TDD                        | Simplified Directions |
| Braille           | Telephone Relay Service    |                       |
| Audiocassette     | Paper and Pen              |                       |
| Magnifier         |                            |                       |
| Computer Diskette |                            |                       |

The following auxiliary aids and services are made available upon request.

Hearing and Speech

Assistive Listening Devices  
AM or FM System (ATRC)  
<http://atrc.org/home/index1.htm>  
E-mail: [atrc-info@atrc.org](mailto:atrc-info@atrc.org)

Cognitive

Visual Displays  
ATRC Hawaii  
200 North Vineyard Boulevard, Suite 430  
Honolulu, HI 96817  
Phone: 1-800-645-3007

The DHS monitors capabilities of staff in using and offering assistive devices.

Several divisions have an informal procedure for responding to requests for auxiliary aids and services, which includes the consideration of an individual's preference, and assesses the availability of other equally effective means of communication. DHS' Policy 4.10.3 and 4 apply.

TDD Communications

In addition to relay services, TDD communication devices are available at:

Oahu

6 DVR locations  
6 BESSD locations  
2 MQD locations  
1 HPHA location  
1 HYCF location  
3 PERS locations

Hawaii

2 DVR locations  
2 BESSD locations  
2 MQD locations

Maui

2 BESSD locations  
1 MQD location

Kauai

1 DVR location  
1 MQD location  
1 BESSD location

The SSD explored the feasibility of installing TDDs for its CPS and APS Hotlines. However, because these Hotlines are equipped with answering machines which do not accept TDD calls, it was determined that TDD hook-up was not feasible. Staff have been instructed that Telecommunications Relay Service (TRS) shall be utilized as an alternate effective means of communication. Moreover, if there is a high volume of calls that the SSD receives through the TRS, the Division shall reassess the need for TDDs.

The DVR has a Statewide Coordinator for the Deaf with a designated Video Phone (VP) line to accommodate the deaf population. The DVR administrative office has a program specialist assigned to the VP and is fluent in American Sign Language as well as knowledgeable in deaf culture, which is required for this position.

Video phones and relay service are most commonly used today by the deaf community and have replaced TDD.

### Website Accessibility

Efforts have begun to enhance website accessibility for readers. A primer on website accessibility, cosponsored by the Disability and Communication Access Board and the Assistive Technology Resource Center, offered information about the need for accessibility, standards related to accessibility, practical approaches to accessibility and specific tools and techniques.

The Department's public information officer also serves as the communications representative.

### Emergency Warning Systems

The Office of the Director and Support Services Offices located in a state office building on Oahu have emergency evacuation procedures that address the needs of persons with disabilities as do branch offices in DHS leased or state-owned buildings. The Fiscal Management Office is responsible for planning/coordinating with the Department of Education overall evacuation procedures during emergencies such as fire, for staff in the Liliuokalani Building.

The DVR, MQD, BESSD, SSD, OYS, and HYCF indicate that they have emergency evacuation procedures, which include safe egress for persons with disabilities. Said programs indicate the plans include a means to alert hard-of-hearing and deaf individuals of an activated alarm. While the HYCF has a strobe alarm in its secured facility, the other divisions maintain that they have implemented a "buddy system" to assist hearing-impaired or deaf individuals.

In meeting with BESSD's Oahu Branch, Neighbor Island Branch and Section Administrators, the Administrators report with confidence that their offices and units have developed written emergency evacuation procedures for egress of disabled staff, clients, visitors and for staff to alert hearing-impaired and deaf individuals of an activated alarm and other needed assistance. The plans are now routinely posted in the offices. The Administrators will take necessary steps to ensure that the evacuation plan is posted at all exits.

Most HPHA administrative offices have emergency evacuation plans and procedures but not all offices specifically address the needs of persons with disabilities. In its public housing projects, some dwelling units are equipped with smoke detectors with strobe lights for the hearing-impaired. In addition, at some of its high-rises for the elderly, a list of frail and disabled tenants (those with known ambulatory, hearing and vision impairments) is compiled and provided to the Honolulu Fire Department.

Assistance will be provided by appropriate personnel to ensure that all DHS program offices have emergency evacuation procedures, which include plans to ensure for the safety of persons with disabilities. The DHS will monitor and inform about emergency evacuation procedures for persons with disabilities in State-owned and leased buildings.

### Access Information

Access information is primarily provided over the telephone. Information about access is also communicated by ADA Notice posted in all DHS units in public areas (Appendix E), public hearing notices, Internal Communication Form (ICF) and policy and procedure dissemination, and websites.



The self-evaluation process will determine whether all staff are knowledgeable about providing access information. As such, training sessions regarding this matter, shall be provided in order to assure equal opportunity to services by persons with disabilities. Training can be face-to-face, video conferencing and/or computer based (CBT) via <http://humanservices.hawaii.gov> in the Civil Rights Corner. In 2014, the CRCS provided CBT training to all DHS staff and face-to-face training to registered clerical staff in the Administrative Procedures sessions. A copy of that training is also available on line (Appendix F).

## **Facilities Assessment**

### Summary of Inaccessible Features

The HPHA conducted a survey and hired a consultant to update the needs of its facilities to identify structural barriers that may impede physical access. In addition, for HPHA-owned Federal facilities, inaccessible elements were addressed through its Capital Fund Program.

As part of the self-evaluation process, an assessment of DHS offices located in both state-owned and leased facilities will be conducted annually to determine the level of physical access to persons with disabilities.

Inaccessible elements of state buildings will be addressed administratively and/or through DAGS. For offices in leased facilities, inaccessible elements may either be addressed by the program, through reasonable modifications to policies and practices, and other program access options, or by removing structural barriers which impede access. Where offices have agreed to modify their policies and practices to accommodate persons with disabilities, no renovations or improvements will be recommended. All renovations and improvements must comply with 2010 ADA Standards. All lease renewals must be reviewed by the DHS ADA Coordinator to confirm compliance with 2010 ADA Standards.

Unannounced site visits to assist in identifying needs are conducted annually, have been completed for 2014 (Appendix G), and will be ongoing through 2016.

### Program Access Options

Program access options for DHS facilities are listed in Appendix H.

Additionally, the HPHA set out to make reasonable modifications to its policies and practices and take whatever steps necessary to ensure that identified barriers were addressed programmatically. Program access options for HPHA included, but were not limited to: 1) performing outreach services; 2) contacting clients by telephone; 3) meeting with participants at an alternate accessible site; 4) allowing an authorized representative to serve on behalf of a client; 5) providing materials in alternate format; and 6) providing auxiliary aids and services. The Divisions are addressing and/or will be addressing program options for areas identified as needing attention in unannounced site visits in 2014.

## Summary

In summary, this two-year plan, highlights DHS' purpose for self-evaluation as required by Section 12101 of the Americans with Disabilities Act, designates an ADA Coordinator, sites key activities and names officials responsible. Programs and processes for self-evaluation are described, communication access and web accessibility are highlighted as is information about emergency warning systems and facilities assessment through unannounced site visits.

Program access options, a list of 2014 site visits, ADA notice, related internal communication, and ADAAA related training are included in appendices.

Some preliminary self-evaluation activities continue as follows:

- ✓ Involve persons with disabilities in program and facilities access discussions
- ✓ Update programs, services and activities as required
- ✓ Inform and train sub-recipients in providing access and compliance
- ✓ Distribute annual Director's ICF on non-discrimination policies
- ✓ Refresh Task Force Representation regularly
- ✓ Remind supervisors and staff of their role in providing reasonable accommodations and modifications on a timely basis
- ✓ Monitor capabilities of staff in using and offering assistive devices
- ✓ Monitor and inform about emergency evacuation procedures for persons with disabilities in State-owned and leased buildings
- ✓ Collect data as required to support integration of individuals with disabilities and/or language barriers into programs, activities and services
- ✓ Develop and educate staff in policy and procedure changes
- ✓ Conduct site visits for facilities and language assessment purposes
- ✓ Submit Civil Rights Report to USDA Office of Civil Rights (OCR) as follow-up to SNAP management evaluation process as required

## **APPENDICES**

- A DHS Policy and Procedures 4.10.3 dated July 9, 2009
- B DHS Policy and Procedures 4.10.4 dated February 17, 2009
- C Director's ICF 14-01 dated January 6, 2014
- D Departmental Discrimination Complaint Policy and Procedures, 4.10.1 dated July 18, 2011
- E ADA Notice
- F Civil Rights Awareness Training
- G List of 2014 Unannounced Site Visits with ICF dated February 3, 2014
- H Program access options for DHS facilities
- I Vision, Mission and Standards of Service
- J Request for Auxiliary Aid Form
- K MQD KOLEA Project Update