



Department of Human Services
Programs, Services and Activities

Self-Evaluation Plan

Title II of the Americans with Disabilities Act (ADA)

August 1, 2008--July 31, 2009

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Issued and Approved
by the Director
Department of Human Services

Lillian B. Koller Date

Executive Summary

This Self-Evaluation Plan is a voluntary effort to comply with Title II of the Americans with Disabilities Act (ADA) at the Hawai'i 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) correcting any discrepancies found, (3) maintaining compliance with ADA relative to State-owned and leased facilities, and (4) assuring communication access via TDD communications, emergency warning provisions for disabled individuals, notices, and dissemination of policies regarding access and non-discrimination.

This one-year plan (August 1, 2008-July 31, 2009) 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 will be provided on an annual basis by DHS Divisions, Administratively Attached Agencies and Commissions. Input will be sought from disabled individuals. Unannounced site visits will be conducted on a regular basis.

In summary here are a few preliminary findings discussed in "corrective actions."

- ✓ Progress report to Food and Nutrition Services Office of Civil Rights in September 2008
- ✓ Annual Director's ICF relative to non-discrimination policies
- ✓ Designation of ADA Coordinator and Task Force Representatives
- ✓ Key activities to include training, meetings, dissemination, process revisions, and posting of required notices
- ✓ Involvement of persons with disabilities
- ✓ Update programs, services and activities as needed
- ✓ Establish consistent, formal procedures for reasonable accommodations and modifications
- ✓ Remind supervisors and staff of their role in providing reasonable accommodations and modifications on a timely basis
- ✓ Inform all sub-recipients and POS providers of their obligations
- ✓ Train sub-recipients and POS providers and monitor compliance
- ✓ Modify POS and other contracts to carry specific language relative to appropriate assurances required by respective funding source/s
- ✓ Review, and modify as needed, licensing and certification regulations
- ✓ Monitor capabilities of staff in using TDD, GTE TRS and other assistive devices
- ✓ Monitor and inform about written emergency evacuation procedures for persons with disabilities in State-owned and leased buildings
- ✓ Collect data as required to support integration of individuals with disabilities into programs, activities and services

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DEPARTMENT OF HUMAN SERVICES
PROGRAMS, SERVICES AND ACTIVITIES

Self-Evaluation Plan

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 (ADA), 42 U.S.C. Section 12101. The purpose of self-evaluation is to identify services, policies and practices that do not comply with Title II requirements, and to correct any discrepancies to bring an entity into compliance.

Additionally, A Civil Rights Compliance Review conducted by the Food and Nutrition Service (FNS) of the U. S. Department of Agriculture (USDA) in 2007 cites the following:

Corrective Action:

“.....the State of Hawaii will prepare a progress report to FNS OCR on the compliance problems it identified in the 1998 Self Evaluation and Transition Plan and the 2001 CR Review.”

Recommendations for Improvement:

“Since the Self Evaluation done in 1998 is almost 10 years old and the transition plan almost 7 years old, DHS, CRCS, will endeavor to conduct a new self study, in cooperation with ACCESS Task Force members, BESSD, and the Disability and Communications Board (DCAB) ending no later than June 2008. A progress report to FNS OCR will be submitted by the DHS’ Civil Rights Compliance Staff by September 30, 2008.”

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 dated September 17, 2007 (Appendix A).

In keeping with this policy, the Department of Human Services (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 08-01 dated January 3, 2008 (Appendix B), an internal communication informing staff of the department’s responsibilities. Furthermore, a notice 08-02, dated January 4, 2008, (Appendix C) informs DHS employees that the DHS does not discriminate against persons with disabilities either in its provision of services or in its employment practices.

The DHS' non-discrimination statement and all related directives, memoranda and public notice, apply to all four Divisions as well as its three administratively attached agencies. 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.

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 complaint in accordance with the Departmental Discrimination Complaint Procedures (Appendix D and E).

In addition to the DHS' established complaint procedure, the HPHA also has a Complaint Procedure for anyone who wishes to file a complaint alleging discrimination, sexual harassment or other violation in employment, in policies or the provision of services, activities, programs or benefits by HPHA. (Appendix F)

Designation of ADA Coordinator

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

DHS - Personnel Office
Civil Rights Compliance Staff
P.O. Box 339
Honolulu, Hawaii 96809-0339
Phone: (808) 586-4955(V) 586-4959 (TDD)
Fax: 586-4990

gwatts@dhs.hawaii.gov

The HPHA ADA Coordinator (Patti Y. Miyamoto) can be contacted at:

The Hawaii Housing Authority
1002 North School Street, Bldg. J
Honolulu, Hawaii 96817
Phone: (808) 832-5900 (V) 832-5848 (TDD)
Fax: 832-3493

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 following departmental employees serve on the Task Force:

William Keahi	Office of Youth Services (OYS)
Alan Takahashi	Med-QUEST Division (MQD)
Valerie Johnson	Vocational Rehabilitation & Services for the Blind Division (VR)
Gibby Fukutomi	Social Services Division
Geneva Watts	Personnel Office, Civil Rights (CRCS)
Glori Inafuku	Hawaii Public Housing Authority (HPHA)
Luanne Murakami	Benefit, Employment & Support Services Division (BESSD)
Sharon Ferguson-Quick	Commission on the Status of Women (CSW)

The key activities of the DHS relative to the self-evaluation process include, and are not limited to:

Meeting to establish time frame for completion of Self-Evaluation Report

Orientation of Task Force on Title II

Policies & Practices Review

Dissemination of ADA Notice

Dissemination of Self-Evaluation Plan

Orientation on Communication Access

Discuss plan of corrective action for practices re access (FNS)

Meeting regarding addressing areas of non-compliance

Meeting regarding development of procedures to respond to requests for building modifications and auxiliary aids

Coordination of facilities review

Dissemination of Self-Evaluation Report

Meeting with the Hawaii Public Housing Authority staff regarding Self-Evaluation for Programs and Services

Dissemination of publication, "Emergency Procedures for Employees with Disabilities in Office Occupancies" to Division Administrators and Staff Officers. (to assist offices in refining emergency evacuation procedures, which address the needs of both employees and service recipients with disabilities)

In addition to being part of the DHS' Access Task Force, the HPHA representatives will coordinate 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.

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, the Self-Evaluation Report will be submitted to the following organizations that provide services to persons with disabilities:

Disability and Communication Access Board
Department of Health
919 Ala Moana Boulevard, Room 101
Honolulu, Hawaii 96814 dcab@doh.hawaii.gov

Ho'opono, Services for the Blind Branch
1901 Bachelot Street
Honolulu, Hawaii 96817

Aloha State Association of the Deaf
P. O. Box 88591
Honolulu, Hawaii 96830 asad0507@yahoo.com

The DHS also will invite comments from the public regarding its Self-Evaluation activities.

Programs and Services

The DHS offers a wide range of state and federally funded programs and services to the public through four divisions and three administratively attached agencies and commissions. Such programs and services include, and are not limited to, welfare assistance (financial and food stamps), employment and training, child care, medical assistance, child welfare services, adult and community care services, vocational rehabilitation, housing, youth services and a commission on the status of women.

Description of Programs and Services

1. Benefit, Employment & 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, Food stamps 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 Division is also responsible for the licensing of Child Care Centers and Homes across the State.

2. Med-QUEST Division (MQD)

MQD administers two major medical assistance programs, the Aged, Blind and Disabled (ABD) Program which will become the QUEST Expanded Access (QExA) program and the Hawaii QUEST Program.

3. Social Services Division (SSD)

SSD administers the Child Welfare Services (CWS) and Adult and Community Care Services (ACCS) programs.

4. Vocational Rehabilitation and Services for the Blind Division (VRSBD)

VRSBD is divided into three (3) programs: Vocational Rehabilitation, Services for the Blind, and the Disability Determination programs.

Vocational Rehabilitation - The program provides services to eligible individuals with disabilities to become productive members of Hawaii's workforce.

Ho'opono - Services for the Blind - Services to eligible blind, deaf/blind and visually-impaired individuals include vocational rehabilitation, adjustment classes, public education, and blindness prevention activities. Ho'opono also maintains a statewide blind registry.

Disability Determination - The program determines disability for Social Security Disability Insurance and Supplemental Security Income benefits.

5. Hawaii Housing Authority (HPHA) (Administratively Attached)

The HPHA administers federal and state public housing and rental subsidy programs, other miscellaneous rental programs, and a Homeless Program. The primary service of these programs is

providing safe, decent and affordable housing to low and very low income families.

6. Office of Youth Services (OYS) (Administratively Attached)
(website: www.hawaii.gov/dhs/youth/oys/)

The OYS was established by legislature in 1989 and administratively placed within DHS. The OYS provides and coordinated 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, the agency places great emphasis on providing and support "front end" prevention, diversion, and intervention services.

The OYS Focuses on six 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.

- Youth Service Centers
- Youth Gang Response System
- Adolescent Diversion – Ho'okala
- Non-residential and In-Community Services
- Community-based Residential Services

The Hawaii Youth Correctional Facility insures public safety by providing programs and service that work towards successful reintegration of incarcerated youths within a safe, secure and just environment, which promotes adolescent development.

7. Commission on the Status of Women (CSW)

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

Support Services

There are five staff offices that provide support services to the aforementioned divisions and administratively attached agencies: 1) Administrative Appeals Office, 2) Fiscal Management Office, 3) Information Systems Office, 4) Management Services Office and 5) Personnel Office. Of these, the Administrative Appeals Office, which conducts fair hearings for clients, and the Personnel Office, which provides employment services, maintain public contact on a regular basis.

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
Lillian Koller

Divisions

BESSD	VRSBD
Pankaj Bhanot	Joe Cardova
Acting Division Administrator	Division Administrator
MQD	SSD
Dr. Kenneth Fink	Amy Tsark
Division Administrator	Acting Division Administrator
<u>Attached Agencies</u>	
OYS	HPHA
Martha Torney	Chad Taniguchi
Executive Director	Executive Director
CSW	
Sharon Ferguson-Quick	
Executive Director	

Self-Evaluation Process for Programs and Services

Equal Opportunity to Participate and Benefit

ADA states “a) A public entity may not deny a qualified individual with a disability an opportunity to participate and benefit from any program; b) a public entity may not afford an opportunity that is not equal to or not as effective as that provided others; and c) a public entity 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 above, the DHS provides a wide range of programs, services, and activities to the public. 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, the DHS believes that these exclusions and/or restrictions are necessary either to the operations of a program, or to ensure for the safety of program participants, and do not discriminate against persons with disabilities. The following identifies exclusions or restrictions to various programs, and provides an explanation as to why the DHS believes they are necessary.

The Child Care Connection Hawaii’s licensing requirements for child care providers may restrict or exclude the participation of certain individuals with disabilities. The provision of 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.

As previously stated, the MQD administers two major medical assistance programs: the Hawaii QUEST Program and the ABD Program, which will become the QUEST Expanded Access (QExA) program. 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.

With respect to the services under the SSD, there are 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 VRSBD 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 and the Disability Determination programs, respectively. 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" (Appendix G), outlines procedures for filling said units.

In terms of services provided at the HYCF, there may be 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.”

Within the DHS, Divisions differ in their approach to responding to requests for modifications. The following are some examples of modifications made to departmental programs, services and activities.

The VRSBD has an established practice for providing program modifications to clients with disabilities. Essentially, the VRSBD 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, while most clients/applicants are responsible for completing applications and other forms in order to receive services, when a cognitively impaired client or applicant is unable to complete necessary paperwork, arrangements are made by VRSBD 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.

At HPHA, reasonable accommodations are made 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 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. HPHA's Reasonable Accommodation and Modification procedures are outlined in the Administrative Memorandum No. 7, dated October 12, 2001. (Appendix H)

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 form "Equal Opportunity to Services" (Appendix I), 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.

Corrective Action:

Although most programs have informal processes for modifying their practices, a formal procedure consistently applied throughout the DHS is needed to address the needs of persons with disabilities. This will help to assure that all staff are aware of the Department's obligation to provide modifications and how to respond to requests for same.

Additionally, the DHS recognizes that training is necessary for staff that has direct contact with the public. Therefore, the DHS will make every effort to ensure that staff are properly trained in accepting and processing requests for reasonable accommodations and modifications.

With respect to corrective action as relates to BESSD, in-house and contract staff were trained by DHS Civil Rights Staff in Fall, 2007. In addition, a Civil Rights module has been incorporated into the New Employee Orientation (NEO) for all new in-house and contract staff.

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 still cannot be excluded from participating in regular programs."

It is the Department's policy that participants of its 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 which may be more appropriate.

As mentioned above, all VRSBD 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-Shepard Act gives priority to persons who are blind to operate vending facilities on Federal property. Similarly, the Hawaii Revised Statutes, Section 102-14, authorize 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 provides 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. If such youth can demonstrate that they can participate in school without being disruptive, they are allowed to return and engage in regular classroom activities (i.e., integrated 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.

There are extensive numbers of contractors which 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 Officer at the address and phone number listed above. All DHS non-bid contracts 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, read as follows:

“The CONTRACTOR shall comply with all federal, state, and county law, ordinance, 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 contracts. Language contained in their contracts reads as follows:

AG Form 103F (09/06)

Website:

www4.hawaii.gov/StateForms/Internal/ShowInternal.cfm?&ShowAll=Yes

“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 any 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 in Section 504 of the Rehabilitation Act.

Also, HPHA'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.

Corrective Action

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, to ensure understanding of their obligation. Furthermore, DHS shall ensure that staff who monitor the contracts for compliance have full knowledge of ADA requirements.

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

BESSD contracting agent/contract monitors are trained to ensure that contracts for compliance have full knowledge of the ADA requirements and have been trained. In addition, BESSD contracting agent/monitors will incorporate more specific language to be in compliance with ADA and other civil rights laws, rules and regulations.

A training and development module, representing combined efforts of DHS and the Office of Language Access at Hawaii's Department of Labor and Industrial Relations, is available at DHS' home page <http://www.hawaii.gov/dhs> in the Civil Rights Corner.

Procurement Contracts

"In selecting procurement contractors, a public entity may not discriminate on the basis of disability." There would be no circumstances in which consideration related to disability would influence the choice of a procurement contractor.

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.

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:

Visual

Large Print
Readers
Braille
Audiocassette
Magnifier
Computer Diskette

Hearing and Speech

Sign Language Interpreters
TDD
Telephone Relay Service
Paper & Pen

Cognitive

Signage
Simplify Directions/Instructions

The following auxiliary aids and services are needed.

Hearing & Speech

* Assertive Listening Devices
* AM or FM System (ATRC)
<http://atrc.org/home/index1.htm>
e-mail atrc-info@atrc.org
1-800-645-3007

Assistive Technology
Resource Centers of
(ATRC) Hawaii
414 Kuwili Street, #104
Honolulu, HI 96817

Cognitive

Visual Displays
Pictorial Signage

* Will be made available upon request.

Corrective Action

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 applies.

TDD Communications

The following is a list of DHS offices, which provide direct TDD communication:

Oahu

BESSD	Oahu Branch	832-3350 (V/T)
BESSD	Employment & Training	587-5260 (V/T)
BESSD	Waipahu First-to-Work	675-0081 (V/T)
BESSD	Wahiawa First-to-Work	621-0070 (V/T)
BESSD	Waianae First-to-Work	692-7760 (V/T)
BESSD	Kailua First-to-Work	266-9635 (V/T)
MQD	Eligibility Branch	587-3520 (V/T)
VRSBD	Administration	692-7715 (V/T)
VRSBD	Staff Services Office	692-7723 (V/T)
VRSBD	Staff Services Office	692-7716 (V/T)
VRSBD	Oahu Branch	586-5167 (V/T)
VRSBD	Central Section	586-5162 (V/T)
VRSBD	Deaf Services Section	586-4939 (V/T)
VRSBD	East Section	586-5165 (V/T)
VRSBD	Metro Section	586-5163 (V/T)
VRSBD	West Section	586-5169 (V/T)
VRSBD	Windward Section	586-5164 (V/T)
VRSBD	Services for the Blind	586-5269 (V/T)
HPHA	Applications Office	832-6083 (TDD)
HPHA	Compliance Office	832-5848 (TDD)
Personnel	Recruitment	586-4959 (V/T)
	Civil Rights	586-4959 (TDD)

Kauai

MQD	Kauai Section	241-3581 (V/T)
VRSD	Kauai Branch	274-3333 (V/T)

Hawaii

BESSD	East Hawaii Section	959-0679 (V/T)
BESSD	West Hawaii Section	327-4794 (V/T)
MQD	East Hawaii Section	933-0339 (V/T)
MQD	West Hawaii Section	329-3735 (V/T)
VRSD	Hawaii Branch	974-6444 (V/T)

Maui

BESSD	Maui Section	984-8300 (V/T)
MQD	Maui Section	243-5785 (V/T)
VRSD	Maui Branch	984-8350 (V/T)

Molokai

VRSD	Molokai Field Office	553-3621 (V/T)
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Additional TDDs are available as follows:

1. BESSD - Investigations Office - Fraud Hotline
2. HYCF - Administrative Office
3. MQD - Administration
4. Maui Management Unit Office, Kauai Management Unit Office

The SSD explored the feasibility of installing TDDs for their Child Protective Services (CPS) and Adult Protective Services (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.

Although some sections have TDD devices, there has been no reason to call upon use or the need has been so rare or infrequent. Sections say they call upon VR for assistance or request TRS assistance.

Emergency Warning Systems

In a memorandum dated April 19, 2006 and again on June 6, 2008 (Appendix J), DHS' Director informed all employees of the procedure for requesting emergency evacuation assistance.

The Office of the Director and the Personnel Office located in a state office building have emergency evacuation procedures that address the needs of persons with disabilities.

The VRSBD, 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 their newly built secured facility, the other divisions maintain that they have implemented a "buddy system" to assist hearing-impaired or deaf individuals.

In meeting with BESSD Oahu Branch (OB) and Neighbor Island Branch (NIB) 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 not routinely posted in the office. The Administrators will take necessary steps to ensure that the evacuation plan is posted.

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.

Corrective Action

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.

Access Information

Access information is primarily provided over the telephone. Information on access is communicated in the following ways:

- ADA notice - to be posted in all DHS units in public areas (Appendix K)
- Brochures/pamphlets
- Public hearing notices
- Dissemination of statewide policies regarding access and non-discrimination to staff.

Corrective Action

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 an

equal opportunity to services by persons with disabilities. Training can be face-to-face, video conferencing and/or computer based (CBT) <http://www.hawaii.gov/dhs> in Civil Rights Corner for example.

Facilities Assessment

List of Program Locations

A list of DHS program locations is attached as Appendix L. It should be noted that DHS offices, which do not provide direct services to the public, such as administrative offices, are not identified on the list.

Summary of Inaccessible Features

The HPHA conducted a survey of its facilities to identify structural barriers that may impede physical access. The HPHA has summarized its facilities' inaccessible elements in Appendix M. In addition, for HPHA-owned Federal facilities, inaccessible elements will be 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 to determine the level of physical access to persons with disabilities.

The last review of state-owned buildings, i.e., maintained by the Department of Accounting and General Services (DAGS), was conducted by Group 70, an architectural firm contracted by DAGS. The DHS conducted a review of its leased facilities utilizing a survey tool developed by Group 70. The survey is contained within the DHS Transition Plan.

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.

Unannounced site visits to assist in identifying needs have begun, will continue throughout 2008 on a regular basis and will be ongoing.

Program Access Options

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

The HPHA proposes to make reasonable modifications to its policies and practices and take whatever steps necessary to ensure that identified barriers are addressed programmatically. Program access options for the HPHA might include, but are not limited to:

- Performing outreach services
- Contacting clients by telephone
- Meeting with participants at an alternate accessible site
- Allowing an authorized representative to serve on behalf of a client
- Providing materials in alternate format
- Providing auxiliary aids and services

The BESSD is addressing and/or will be addressing program options for areas identified as needing attention in unannounced site visits in 2008.

Summary

While it is the intent of DHS to evaluate its programs, services, and activities on an ongoing basis, a formal self-evaluation and report will be available every three years.

APPENDICES

APPENDIX A	DHS Policy and Procedures 4.10.3
APPENDIX B	ICF 08-01 dated January 3, 2008
APPENDIX C	ICF 08-02 dated January 4, 2008
APPENDIX D	DHS Policy and Procedures 4.10.1
APPENDIX E	DHS Policy and Procedures 4.10.2
APPENDIX F	HPHA's Complaint Procedure
APPENDIX G	Hawaii Administrative Rules 17-2028-40
APPENDIX H	HPHA's Reasonable Accommodation and Modification Procedures
APPENDIX I	Equal Opportunity to Services
APPENDIX J	Emergency Evacuation Assistance, June 6, 2006
APPENDIX K	ADA Notice
APPENDIX L	DHS Program Locations
APPENDIX M	HPHA ADA/UFAS Accessible Units 9/25/07
APPENDIX N	DHS Facilities, Program Access Options, and Checklist to Ensure Facilities Access