



SAN MATEO COUNTY  
**COMMUNITY**  
COLLEGE DISTRICT

# SMCCCD - District Office

## Appendix A: Self-Evaluation of Policies, Procedures, and Practices

DRAFT



The Americans with Disabilities Act  
Self-Evaluation Report for

# San Mateo Community College District

District Office



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# I. PROJECT OVERVIEW

## A. Acknowledgments

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

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

## B. Introduction

The San Mateo Community College District is committed to providing seamless access to all its programs, services and activities for qualified people with disabilities. SMCCD is not only dedicated to ensuring compliance with State and Federal disability

rights laws, it aspires to be a model of best practices in the areas of accessibility and reasonable accommodation.

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

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

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

### 1. Purpose of the Americans with Disabilities Act

Passed in 1990, the Americans with Disabilities Act (ADA) is one of the most comprehensive civil rights laws in the nation. It provides protection to an estimated 57 million Americans in: employment (Title I); receipt of programs, services and activities

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from State and local government (Title II); the receipt of goods and services from private businesses (Title III); and telecommunications (Title IV). In 2008, the Americans with Disabilities Amendment Act (ADAAA) was passed. The ADAAA gives guidance to the courts regarding who has standing under ADA. The result has been an increasing number of people who are now able to bring ADA claims in Federal Court.

## 2. Overview of Disability Civil Rights Law Impacting the San Mateo Community College District.

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

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

## 3. ADA Self-Evaluation Requirements

Required by 28 CFR 35.105, the ADA Self-Evaluation is a complete examination of all programs, services and activities provided by SMCCD, to ensure that, when viewed in their entirety, they are readily accessible to qualified people with disabilities.



The purpose of the ADA Self-Evaluation is to identify areas where changes are needed to ensure access is in place for people with disabilities.

#### 4. Who is a Qualified Person with a Disability?

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

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

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

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

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## D. Scope of the Self-Evaluation

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

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

## E. Self-Evaluation Method of Review

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

## F. ADA Transition Plan Requirements

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

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

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

## G. How This Report is Organized & To Be Utilized

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

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

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

## II. SURVEY RESPONSES AND RECOMMENDATIONS

### Recommended Actions

#### Accommodations Process

- Ensure that a reasonable accommodations process is put in writing.
- In the reasonable accommodations process, include a policy or procedure to address determination of “direct threat”, and a no-surcharge policy.
- Make sure that the reasonable accommodations process contains a policy or procedure regarding determination of undue hardship.
- Include a recommendation in the reasonable accommodations process that programmatic access solutions are evaluated by an ADA Coordinator and documented.
- Make sure that the reasonable accommodations process contains a policy against requiring an employee with a disability to compete for a vacant funded position if they are unable to be accommodated in their own role.
- Ensure that persons responsible for implementing the reasonable accommodations process are trained in its legal requirements.
- Ensure that information on how applicants or candidates may initiate a reasonable accommodations request is readily available.

#### Training

- Offer staff training on: civil rights; ADA requirements and disability awareness; best practices for maintenance personnel to maintain accessible physical environments.
- Offer the District’s Disability Advisory Committee training regarding the ADA and related California government code requirements.
- Ensure that the District has a policy regarding non-discrimination against former drug users.
- Consider offering trainings such as: web accessibility for employees who update the College’s web information; and event accessibility best practices for employees who schedule and manage College events.
- Keep training attendee rosters.

#### Grievance Process

- Ensure that grievance policies are posted in work areas.
- Ensure that the grievance process: offers assistance to persons with disabilities; provides timelines on when to expect a result; has a second level of review;

contains a notice that the grievance system is available in an alternative format; or contains the name of the ADA coordinator.

- Ensure that the grievance process includes someone assigned to investigate grievances, including alleged failures to reasonably accommodate.
- Ensure that information on how applicants or candidates may initiate a reasonable accommodations request is readily available.
- Ensure that exams given as part of the application process are available in alternative formats, and that buildings where interviews are held are on accessible public transportation routes.

## Survey Response Overview

### Notices & ADA-Related Procedures

#### Notices/Grievance Process

ADA Coordinator survey responses indicate that the District has notices regarding compliance with the Americans with Disabilities Act, i.e. equal access, reasonable accommodation, prohibition against harassment, and non-discrimination, with respect to both employment and educational opportunities. These policies are disseminated electronically, via the District's website<sup>1</sup>, but survey responses indicate that physical copies of these may not be posted in work areas.

These notifications are not explicitly set out in the available grievance system. Additionally, survey responses indicate that the grievance system does not: offer assistance to persons with disabilities; provide timelines on when to expect a result; have a second level of review; contain a notice that the grievance system is available in an alternative format; or contain the name of the ADA coordinator. Additionally, there is

<sup>1</sup> Note: one survey response indicated that these notifications are not available on the District website. A quick review of the District website showed that there is a page specifically dedicated to web accessibility, references to EEO and an EEO Committee in the hiring process. Specific statements regarding non-discrimination and harassment were not immediately apparent on District website.

currently no one specifically assigned to investigate grievances related to ADA issues, including alleged failures to reasonably accommodate.

According to survey responses, it is currently unclear how a recipient of District Office programs, services and activities would bring a grievance against a contracted service provider. Because of this, it is not clear how a contract administrator and/or ADA Coordinator would become aware of or address any such grievances. Survey responses indicated that additional language could be added to contract templates regarding this, if needed.

#### Reasonable Accommodations Process

With regard to the reasonable accommodations processes; employee accommodations are managed by supervisors and Human Resources; job applicants can request reasonable accommodations through a Senior Human Resources Representative on the recruitment side; and student requests are handled by Campus Student Services. Campus Student Services is also responsible for providing accommodation to programs, activities and services provided to the public, e.g. job fairs, commencement exercises, athletic events, etc.

According to surveys, although there is currently a reasonable accommodations process, this process has not been put in writing. Additionally, persons responsible for implementing the reasonable accommodations process have not been trained in its legal requirements, although the District indicates it does follow the legal mandates regarding requests for medical information.

Survey responses indicate that the interactive process is documented via notes taken in meetings, and emails. The District utilizes outside resources to assist in the

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interactive process such as JAN, Adaptive Technology for the Blind, and interpreter services. Additionally, the District has a system in place to reassign employees with disabilities into other vacant, funded positions, if the employee is unable to be accommodated in their own role. This system, however, does not include a policy against requiring the employee with a disability to compete for the role.

While there is no specific policy or procedure regarding determination of undue hardship in the interactive process, this determination is made by the Vice Chancellor or Director of Human Resources. There is currently no policy or procedure in place to address determination of “direct threat”. Additionally, if programmatic access solutions are implemented to create access, those are not approved by an ADA Coordinator or required to be documented. Also, there is currently no anti-surcharge policy in place to make it clear to staff not to charge for accommodations. For employees, there is an ADA agreement form given to the employee if a reasonable accommodation is approved.

## Policies & Training

### Training

Survey responses indicate that, except during new hire orientation, the District does not offer staff training on: civil rights; ADA requirements and disability awareness; or best practices for maintenance personnel to maintain accessible physical environments. Additionally, the District’s Disability Advisory Committee has not received training regarding the ADA and related California government code requirements (but it is in the works). It is unclear whether the District has a policy regarding non-discrimination against former drug users. If Faculty or Staff have questions regarding

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legal requirements, they may reach out to Human Resources, or receive information during workshops.

Survey responses indicate that the District would like to offer such training as well as: web accessibility for employees who update the College's web information; and event accessibility best practices for employees who schedule and manage College events. Generally, the District does not maintain training attendee rosters.

### Policies

Survey responses addressed a variety of ADA and accessibility related policies. According to responses, the District currently has no uniform policy regarding use of motorized mobility devices on College premises. With regard to policies and/or procedures around maintenance of accessible features, the ADA Coordinator's survey response generally referred to Facilities, and indicated that any systems to report and correct accessibility issues would be managed through Facilities' Work Order. Survey responses also indicate that the College has a service animal policy, but staff do not receive training regarding this, and there is no policy should any "incidents" regarding service animals occur. Additionally, emotional support (i.e. "comfort" animals) are addressed in a manner similar to the interactive process.

### Hiring & Employment

Survey responses indicated that the District advertises available jobs on sites designated to people with disabilities, but not specifically to local disability organizations. Job announcements include an Equal Employment Opportunity (EEO) statement, as well as notification that reasonable accommodations are available.

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Survey responses indicate that information on how applicants or candidates may initiate a reasonable accommodations request is not readily available. If an applicant makes such a request, however, the District offers assistance to anyone who requires it in order to make the request.

Essential and marginal functions of each position are identified before advertising for the position through job description, managers, and Human Resources. For non-faculty related positions such as classified ones, minimum qualifications are reviewed with the Manager and Human Resources when established. Applicants have the opportunity to request accommodations in the hiring process, and these are granted when “deemed appropriate.” Candidates are informed in advance, via email, regarding the types of activities involved in the selection process. The District notes that it needs to ensure that exams given as part of the application process need to be made available in alternative formats.

On site interviews are held in College buildings, and sites are selected by the Hiring Manager, selection committee members, and Human Resources. Notably, however, survey responses indicated that there is currently no requirement that buildings where interviews are held be on accessible public transportation routes. Survey responses stated that selection committee panelists receive an orientation which includes disability etiquette and information on how to form legally compliant interview questions.

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# Communications

## Recommended Actions

- Ensure that College publications are offered in alternative formats.
- Ensure that the District's telephone and 911 systems are accessible to TTY's and modems.

## Survey Response Overview

### Print Materials/Vision Impairments

Survey responses indicated that, at each college, publications are reviewed to ensure positive portrayals of persons with disabilities by the Director of Marketing at that College. The District itself reviews College website materials for potentially demeaning or offensive content, and their policy is immediate remediation if any reports are made (which has not happened, to date). Web content published on the District websites is reviewed at multiple levels to ensure appropriate (i.e. "person-first") language.

It is unclear whether all College publications are offered in alternative formats. However, College web pages "are tested frequently for accessibility". Additionally, the District Office does not use touch screen information systems for public information. Survey responses indicate that IT provides training to content owners in how to make pages accessible and recently launched an accessibility website to provide training resources at a larger scale. Additionally, each footer in the district website includes a link to an accessibility reporting form.

The District has a Visual Identity Guide with font recommendations for web and printed materials. Font sizes on the District websites are tested for accessibility compliance by the Web Accessibility Programmer, and the minimum font size for body

content on the district website is 14pt. Digital communications are typically done through email (not attachments to email) as well as the District website.

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

It is not clear whether the District's telephone and 911 systems are accessible to TTY's and modems. If public address systems are used, the AlertMe notification service through Regroup sends text messages to combine with on-location audio alert systems.

All tutorials and training videos produced by IT for use in the District website include captioning. IT is also currently looking at a company called VITAC to provide live captioning services District-wide. As needed, alternate methods such as written instructions are provided. Survey responses indicated that, in Canvas<sup>2</sup>, 3C Media provides a live captioning service. In-person interpreters are used during opening day and on-request for College events. The District requires live and pre-recorded videos on the College website to be captioned for those who are deaf or hard of hearing.

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## Faculty

### Recommended Actions

- Develop and implement a policy to ensure that digital materials required by Faculty (e.g. websites) are accessible.
- Offer disability and accessibility related training geared toward Faculty.

<sup>2</sup> Canvas is a cloud-based learning management system (LMS) specifically designed for K-5 on up through higher education institutions. Canvas LMS is a scalable platform that can be used to serve education organizations of all sizes and types, from individual classrooms to large universities, and from blended to fully virtual learning.

## Survey Response Overview

With regard to hiring Faculty that may or may not have a disability, minimum qualifications are identified through the state Chancellor's Community College Office and provided to all community colleges (versus qualification determinations for other roles, outlined above). It is unknown whether there is a policy ensuring that digital materials required by Faculty (e.g. websites) are accessible, but survey responses indicate the Disability Resource Center (DRC) is best suited to address questions regarding policies and practices to ensure that Faculty select accessible materials for their curriculum.

Information Technology (IT) responses indicated that most faculty now use Canvas for their course content. Canvas courses can be quickly scanned using individual page accessibility checkers, as well as an entire course accessibility checker named UDOIT. The District (via IT) is looking for solutions to replace the remaining Faculty web pages.

Additionally, survey responses noted that most short, not-for-credit workshops or classes do not have a syllabus, therefore accessible syllabi would not be an issue for those offerings. Overall, survey responses indicated a desire for more disability and accessibility related trainings, including training for Faculty.

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## Information Technology & Digital Communication

### Recommended Actions

- No recommendations at this time.

### Survey Response Overview

Survey responses indicate that District websites are tested for accessibility, and each webpage contains a statement regarding accessibility including a form to submit any web accessibility concerns. Specifically, College website postings are reviewed for accessibility before they are published using the “accessibility checker” feature in “OU Campus”, the District’s CMS. All new websites must meet WCAG 2.1 standards. Older sites have undergone remediation, with a 74% reduction in scannable errors over the last calendar year.

Site-wide scans are also conducted monthly or on an as-needed basis using PopeTech. Site-wide scans are possible using Tenon or Funnelback to identify web pages and documents with potential accessibility issues. Individual files are checked using WAVE and/or aXe. The District is in the process of moving older form documents to accessible digital versions in Formstack. Additionally, Financial Aid documents are in the process of being migrated, with admissions related documents planned for next year.

IT recently released a website with tutorials and training regarding web accessibility (e.g. OmniUpdate, accessible Formstack forms, PDF/Word documents), and that the District would welcome additional information regarding web and digital ADA Self-Evaluation Report for: San Mateo Community College - District Office

accessibility. The District has not received any major complaints regarding accessibility on the College or District websites.

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## Law Enforcement

### Recommended Actions

- Develop and provide training for law enforcement officers and campus first responders regarding disability awareness training, and disability civil rights mandates under State and Federal Law.
- Develop and provide training for law enforcement officers on best practices for communicating with persons with disabilities.
- Ensure that any service animals impacted by an arrest are permitted to remain with the arrestee.

### Survey Response Overview

Survey responses indicate that District law enforcement officers are currently not required to receive disability awareness training, and that campus first responders have not been trained regarding the disability civil rights mandates under State and Federal laws.

If an arrest is made where a service animal is involved, Animal Control would be contacted. If an arrest is made where medical appliances such as canes, walkers, hearing aids, etc., may be involved, those appliances would stay with the arrestee. If an arrest is made that requires transporting a mobility device, the Police would facilitate transportation. Finally, if an arrestee has medication needs, Health Services and the Police would assist.

If District law enforcement or first responders need to communicate with a person who is Deaf or Hard of Hearing, they would request the assistance of an interpreter. They have not, however, been trained in best practices for communicating with persons with disabilities. District law enforcement survey responses indicate they would welcome additional training in disability civil rights and best practices on campus.

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## Meetings & Events

### Recommended Actions

- Develop and utilize an events accessibility checklist.
- Develop and implement training for persons administering meetings in the College's disability civil rights responsibilities.
- Ensure that FM loops are utilized.

### Survey Response Overview

Survey responses indicate events accessibility checklists are not currently utilized, and that event and meeting announcements may not include notices that auxiliary aids and services are available as needed. Additionally, persons administering meetings are not trained in the College's disability civil rights responsibilities if those meetings are not-for-credit.

Because meetings are typically held in College buildings, they are accessible to public transportation, and it is assumed that features such as arrival points, rooms, restrooms, registration counters, tables, integrated seating, etc., are accessible. Survey responses indicate that Staff are not trained in how to set up meeting rooms to ensure accessibility, e.g. maneuvering clearances.



There is currently no practice to announce service animal relief areas prior to meetings, or to read PowerPoint slides aloud for persons who are blind or have visual impairments. One survey response indicated that, when multimedia presentations are used, accessible alternatives are offered that are synced with the presentation, including, but not limited to, live interpreters and live captions and audio descriptions. If videos are used, captioning and audio-descriptors are not consistently required. All publicly broadcasted meetings are required to be captioned and in certain cases feature a live American Sign Language interpreter.

Additionally, physical features such as stages, platforms and/or microphones are not utilized so are not part of any accessibility considerations. Because of this, it's unclear whether FM loops are not utilized. In the rare instance that ASL and/or real-time captioning was used, seating was reserved up front for persons needing this service, and ASL interpreters were situated according to best practices (e.g. good lighting). The interpreters were not provided information ahead of time regarding spellings of names, difficult terms, etc.

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## Physical Education

### Recommended Actions

- Develop processes to provide orientation to persons who are blind or vision impaired.

### Survey Response Overview

Accommodations for persons with disabilities within the Physical Education

Department are handled by the Kinesiology Campus Dean. Persons with disabilities are  
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served in an integrated setting, adaptive equipment is available, and adequate maneuvering clearances are provided.

Survey responses indicate that it is unclear whether there are processes in place to provide orientation for people who are blind. Finally, apparently one complaint was received regarding access, which was resolved.

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## Purchasing & Service Contracts

### Recommended Actions

- Ensure that there are steps in place for persons with disabilities who believe they have been discriminated against by a campus vendor or contractor.
- Ensure that there is a process to inform a contract administrator or ADA Coordinator of alleged civil rights violations.
- Ensure that there are accessibility plan checks in place when vendors are conducting improvements in public spaces.
- Create and implement guidance for vendors regarding clear space and furniture placement.
- Ensure that vendors who have public contact are trained or provided guidance regarding ADA requirements and disability awareness.
- Add accessibility as a consideration to routine purchases.

### Survey Response Overview

Survey responses indicate that contracts contain language holding contractors and vendors to applicable State and Federal disability civil rights mandates. It is not clear what steps are in place for persons with disabilities who believe they have been discriminated against by a campus vendor or contractor, or how a contract administrator or ADA Coordinator would become aware of alleged civil rights violations.

It is not clear whether accessibility plan checks are in place when vendors are conducting improvements in public spaces. There is no guidance in place for vendors regarding clear space and furniture placement. Additionally, vendors who have public contact are not currently trained or provided guidance regarding ADA requirements and disability awareness.

During the bidding process, public documents related to bidding are primarily located for download on the District's bid portal – PlanetBids. If accessibility is an issue, accommodation language could be added to the platform and or bid documents if needed. Survey responses indicate that all meetings related to bidding and contracting can be held in accessible locations. Routine purchases do not generally consider accessibility unless requested.

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## Student & Community Services

### Recommended Actions

- Ensure that processes are in place to support accessibility in distance learning programs.
- Develop and, as needed, implement protocols on best practices for transporting students with disabilities.

### Survey Response Overview

The primary resource for students seeking reasonable accommodations is Campus Student Services. Survey responses indicated that distance learning programs are offered to students, but it is unknown how or whether access is addressed. The College provides transportation services to field trips and events, and it is unclear how

reasonable accommodations and/or best practices for transporting students with disabilities might be addressed in these instances.

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## Emergencies & Evacuation Procedures

### Recommended Actions

- Review the Equal Employment Opportunity Commission's guidance on identifying employees who might need assistance during an emergency due to their disability.
- Include people with disabilities in the development and drilling of emergency plans.
- Ensure that redundancy plans are in place for the evacuation of persons with disabilities in the event of emergencies.
- Ensure that emergency plans are coordinated with the Fire Department.
- Ensure there is a plan to hydrate people held outside a building for a prolonged period of time during evacuations.

### Survey Response Overview

Survey responses indicate that the District has not reviewed the Equal Employment Opportunity Commission's guidance on identifying employees who might need assistance during an emergency due to their disability, but that students must self-identify as such. Survey responses conflict on whether employees with disabilities have been involved in creating emergency related training, but do indicate that persons with disabilities have been involved in at least one training drill to date. It is also unclear whether emergency management teams in all facilities have been trained regarding the needs for employees with disabilities during an emergency.

To handle emergencies, the District has an auxiliary notification system that goes out to Public Safety if anyone calls 911 from a district number. Floor wardens have been assigned to assist evacuating persons with disabilities, but survey responses conflict on whether redundancy plans are in place, and whether evacuation procedures have been coordinated with

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the local Fire Department (although the Fire Department is familiar with the campus). Additionally, the District ensures that persons who are blind or deaf can be alerted and assisted during an active shooter event via AlertMe (Regroup). Text messages and email are sent out and will notify people who are Deaf or Hard of Hearing. For people who are blind or have vision impairments, text to voice messages are available, and announcements are made via EAS loud speakers for those who may not have a mobile device. Additionally, Building Captains have been trained to assist and communicate with both seeing and hearing impaired persons. For people with hearing impairments, lights will be turned on and off to gain their attention, and emergency messages will be written and spoken face-to-face for lip reading capable people. Strobe lighting is installed in “newer” buildings. People who cannot see will be personally assisted to secure locations.

Survey responses additionally indicate that: all emergency exits are clearly marked; back-up emergency evacuation chairs are maintained and in place (and responders are trained in the use of these chairs; Public Address systems are monitored to ensure adequate volumes across impacted areas; “modern” elevators have two way communications systems that are functional and accessible to persons who may be Deaf or Hard of Hearing; Areas of Refuge have communications systems from that site to an event control center but, for people who are Deaf or Hard of Hearing, they would need to communicate via AlertMe.

The District has a procedure in place for shutting down the intake on the HVAC system. In the event of a shelter in place, Campus Health or Paramedics would be called upon to assist with medical devices and medication needs, Building Captains could help on a limited basis for needs such as epinephrine and blood sugar (for diabetics able to self-diagnose. Survey responses conflicted on whether there is a plan to ensure that people are hydrated if held outside a building for a prolonged period of time.

The District’s Public Safety website has information regarding training, and alternative formats of this training and information are available in alternative formats upon request.  
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## Construction

### Recommended Actions

- Engage Certified Access Specialists during design and construction, and ensure that stakeholders with disabilities are involved in reviewing major public projects.

### Survey Response Overview

#### **Construction and Remodels**

Survey responses indicate that District Standards require that architects, engineers and other professionals design and execute the District's construction projects according to the latest building codes, regulations and standards. The District could not say whether Certified Access Specialists (CASps) were engaged during design and construction, and wasn't sure whether stakeholders with disabilities were involved in reviewing major public projects. A specific District employee is responsible for monitoring access during campus construction.

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## Vetting of Self-Evaluation Results

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

### **Vetting Activity**

**Report Concerning the Self-Evaluation Vetting**

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

**Input Received During Vetting**

**Response to Input during Vetting:**

**Persons Involved in Vetting:**

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**Use of This Self-Evaluation as a Living Document**

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

## Staff Who Contributed to this ADA Self-Evaluation

Tom Bauer, Vice Chancellor  
Jonathan Bissell, Executive Director  
David Feune  
Susan Harrison, Director, General Services  
Ingrid Melgoza, Human Resources Specialist  
Ben'Zara Minkin, Emergency Preparedness Manager  
Mwanaisha Sims, Director of Policy, Training and Compliance  
Christopher Smith, Interim Director of Web Services  
Bill Woods, Director of Public Safety

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## Work Plan for the Self-Evaluation Implementation

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

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

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

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



# Appendices

## Appendix A

### 28 CFR 35.105 Self-Evaluation.

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

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## Appendix B

### California Government code section 11135

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

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

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

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## Appendix C

### California Government Code Section 12926

*Cal Gov Code § 12926 (2010)*

#### § 12926. Definitions regarding unlawful practices

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**(E)** The terms of a collective bargaining agreement.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **HISTORY:**

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

#### **Amendments:**

##### **1985 Amendment:**

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

##### **1990 Amendment:**

Added subd (j).

##### **1992 Amendment:**

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

ADA Self-Evaluation Report for: San Mateo Community College - District Office



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

### **1993 Amendment:**

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

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

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

### **1998 Amendment:**

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

### **1999 Amendment:**

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

### **2000 Amendment:**

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

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

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

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

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

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

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

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

#### **2003 Amendment:**

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

#### **2004 Amendment:**

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

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

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## Appendix D

### San Mateo Community College District

#### Notice of Compliance Under ADA & California State Law

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

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

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

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

Anyone who requires auxiliary aids and services for effective communication, or a modification of policies or procedures to participate in a program, service or activity within the San Mateo Community College District should submit their request for reasonable accommodations to **(ADA COORDINATOR EMAIL ADDRESS NEEDED HERE)** (unless otherwise specified) as soon as possible, but no later than **72 hours** before the scheduled event.

Neither the ADA, nor state law requires the San Mateo Community College District to take action that would fundamentally alter the nature of its programs, activities or services or impose an undue financial or administrative burden. Complaints about web accessibility, alternate media or academic accommodations can be submitted online via our [online complaint form](https://collegeofsanmateo.edu/forms/grievances.asp) (link: <https://collegeofsanmateo.edu/forms/grievances.asp>).

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

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## Appendix E

### San Mateo Community College District

#### ADA Notice Dissemination Plan

Title II of the ADA, 28 CFR 35.106<sup>3</sup> requires that the San Mateo Community College District produce and disseminate a notice of their ADA compliance.

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

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

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

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

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

<sup>3</sup>28 CFR 35.106 Notice: A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part.

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## Appendix F

### Grievance Procedure under ADA or California State Disability Civil Rights Laws

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

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of the complainant and location, date and a description of the problem(s). The District’s Grievance Procedure form is available online at **(PLEASE FILL IN HERE)**. Alternative means of filing a complaint, such as personal interviews or a tape recording of the complaint, are available to persons with disabilities upon request.

---

## Appendix G

Contact Information for the the San Mateo Community College District’s Disability Resource Center and/or ADA or Reasonable Accommodations Coordinator:

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

**(PLEASE ADD HERE)**

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## Appendix H

### SURVEY QUESTIONS

ADA Self-Evaluation Report for: San Mateo Community College - District Office

## ADA Coordinator

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



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

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

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

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

43. When entering into settlement agreements as part of the Project Civic Access, the US DOJ requires that the staff of Title II entities, which have public contact, attend a 4-hour training covering ADA requirements and disability awareness. How is the College informing impacted staff of the College's responsibilities and disability awareness?
  44. In addition to staff training provided to date, are there other trainings you think should be produced? If yes, what training is needed and for whom?
  45. Are there areas, not noted above, that you think should be studied within this Self-Evaluation?
  46. Does the College have a policy in place that prohibits discrimination against persons who formerly used drugs illegally?
  47. Does the College have any programs that sell tickets with assigned seating?
  48. How are reasonable accommodations handled for College volunteers?
  49. Does the College have an anti-disability harassment policy?
    - a. If yes, is it based upon zero tolerance or the legal definition of disability harassment?
    - b. How often is it disseminated to all College staff?
  50. Is the President involved in and supportive of the ADA project?
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51. What is the policy/practice regarding faculty selecting instructional material in a timely manner in order that it may be made available in alternative format as needed?
52. Does the campus operate any programs in the satellite locations? If yes, were they surveyed as part of the Transition Plan?
53. What is the system for providing accommodation to programs, activities and services provided to the public? In this question we're looking at job fairs, commencement exercises, athletic events, etc.
54. Has the campus had complaints regarding disability civil rights matters? If yes, please explain.
55. Does the campus operate a distance learning program? If yes, how is access addressed?
56. Is there a policy in place that controls the faculty use of their private websites for required instruction?
57. Does the campus have "smart classrooms?" If yes, is access for persons with disabilities checked in those classrooms including site lines and access to technology?
58. How are disability civil rights addressed in program components that are provided through a third-party contract? It is important to note that the campus may not legally enter into a business arrangement that contracts the way the campus disability civil rights responsibilities.

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

68. Does the College rent space off-campus for the purpose of providing programs, services or activities? If yes, how is that space evaluated for physical access?
  
69. What staff training has occurred to date regarding disability civil rights requirements?
  
70. Does maintenance staff use motorized carts, which share the path of travel with pedestrians on campus? If so, what safety considerations have been made for persons with disabilities sharing this path of travel?
  
71. Do trucks making deliveries to campus share the pedestrian path of travel? If yes, has there been an effort to minimize the comingling of pedestrian travel with delivery truck movement?
  
72. Are there campus programs offered offsite? If yes, please describe these programs.



## Communications

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

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

## **Electronic Communication**

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

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

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

## Law Enforcement

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

9. How do officers communicate with persons who are deaf or hard of hearing?
  
10. Does the 911 system have TTY? If yes, how often does training occur regarding its use?
  
11. Is there a procedure in place for officers to obtain a sign language interpreter when one is needed on an emergency basis?
  
12. Have officers been trained regarding the best techniques for communication with persons with disabilities and officer safety? If yes, were the following disabilities covered?
  - a. Vision Impairments
  - b. Deaf, Hard of hearing and Speech Impairments
  - c. Developmental Disabilities
  - d. Traumatic Brain Injury
  - e. Post-Traumatic Stress Disorder
  - f. Learning Disabilities
  - g. Mobility Impairments
  - h. Multiple Chemical Sensitivities
  - i. Mental Disorders
  - j. Others, please list
  - k. Competing Disabilities (i.e. someone is on the bus with a service dog and another person on the bus has a phobic response to the dog and wants it removed as an accommodation. Both have rights to be considered. The passengers are in conflict).

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



## Library Services Program Survey

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

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

## Meeting and Event Planners

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

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

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

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

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

24. Have transaction points been reviewed for clear space, and elevation?
  
25. If parts of an exhibit are inaccessible due to technical infeasibility, is video with captioning used to display the exhibit?
  
26. If buffet food services are part of the event, is support available as needed for persons with disabilities?
  
27. Does the campus have an event planning checklist to address access in meetings and event planning?

## Physical Education

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

# Purchasing and Service Contracts

## Introduction

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

## General Conditions

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

## Construction and Remodels

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



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

### **Service Contracts**

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

### **Purchase of Items Which Have Communication Elements**

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

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

### **General Purchases**

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



## Student/Community Services

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

ADA 28 CFR part 35 section 35.104 defines:

***“Auxiliary aids and services includes--***

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

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

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

**(4) Other similar services and actions”.**

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Please explain.

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

## Medical Services

### Introduction

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

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

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

## Emergencies and Office Sites

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



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

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

17. Are back-up emergency evacuation chairs in place?
  
18. If areas of safe refuge will be in use, is there a communication system from that site to the event control center? If yes, would this system work for a deaf person?
  
19. Are all PA systems monitored by maintenance staff to ensure the volume is high enough to be heard throughout the intended areas of impact?
  
20. Are emergency evacuation chairs to be used? If yes, consider:
  - a. Has staff been trained in the use of these chairs?
  
  - b. If yes, did this training include information regarding the risks of transferring some persons with disabilities into and out of the chair?
  
  - c. Have impacted employees with disabilities been involved with the training?
  
  - d. What is the plan should the chair need to be used for more than one person? (Consider where the first evacuee will be left when the chair is taken back into the site for reuse.)
  
  - e. Have the chairs been tested in the stairwells to ensure they can operate and turn in the space available?

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