

Northern Transitions, Inc.
Accessibility Plan
FY 2017

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Americans With Disabilities Act Compliance

It is the policy of the Board of Directors that Northern Transitions, Inc. will comply with the Americans with Disabilities Act in architectural design, communications, service delivery and all aspects of its personnel and management practices.

Procedures for Requesting Reasonable Accommodations

Applicants may make a request for reasonable accommodations with regard to completing an employment application or interview from front office staff and/or the individual conducting the interview.

Staff who require reasonable accommodation with regard to understanding, complying with or benefitting from NTI policies and procedures should request reasonable accommodation from their supervisor or the Rehabilitation Director.

NTI employees whose disabilities interfere with performance of their duties should request reasonable accommodation from their supervisor or the Rehabilitation Director.

Persons served may request reasonable accommodations necessary to apply for, engage in, and benefit from services. NTI personnel make every effort to recognize and address needs for accommodation prior to the individual's request. Requests can be made by the applicant, person served or someone acting on their behalf. NTI will provide reasonable accommodations for recognized or reported barriers. This will be done as soon as reasonably possible following recognition or request.

Other stakeholders may make initial requests for accommodations to any senior administrative staff member of the organization.

If a reasonable accommodation is not obvious or readily achievable, the request shall be referred to the Rehabilitation Director.

A letter from a doctor may be requested as permitted by law.

Reasonable accommodations that do not result in undue hardship to the Agency and do not fundamentally alter services or job duties will be granted to the extent practicable.

Occasionally, an accommodation which is more effective or appropriate and achieves the desired result may be selected over the specific accommodation requested.

The Rehabilitation Director is responsible for deciding on the appropriateness of accommodation requests.

Representation of Persons with Disabilities

The Board of Directors will have at least one member who either has a disability or represents or advocates for persons with disabilities. The Board Membership Committee and Executive Director will keep this in mind when vacancies arise. Accommodation to facilitate attendance and participation in board functions is provided upon request.

Job postings are communicated to the Michigan Talent Bank which Michigan Rehabilitation Services uses as a reference in job development, in addition to other standard public communications

Community Participation

Through active participation in local and state organizations, Northern Transitions, Inc. actively supports and advocates for systemic changes which will remove barriers in architecture, attitude, employment, transportation and communication to persons with disabilities.

It is the Executive Director's responsibility to ensure that Northern Transitions, Inc. representatives are involved in a variety of statewide and local activities to advocate for removal of barriers to persons with disabilities.

Appropriate local organizations are allowed to use NTI's main building as a meeting place.

The Board Nominating Committee considers broadening the scope of local organizations and agencies represented when soliciting new members.

Architectural Barrier Removal

As of the adoption of this plan, NTI's service sites are architecturally accessible. Future service sites will be selected with this requirement foremost in mind.

To the extent that it does not create undue hardship, Northern Transitions, Inc. will modify workstations to reasonably accommodate persons with disabilities as requests are received or needs are recognized. Reasonable accommodations are made in accordance with Federal and State laws.

Environmental Barrier Removal

An environmental barrier is a location or characteristic of the setting that compromises or hinders the individual's performance or ability to benefit from services. Some conditions are inherent in the activity (equipment noises and distractions at Chippewa County Recycling or lack of privacy at a community placement). Attempts are made to identify and reduce or accommodate for existing barriers.

Private offices and meeting rooms are available at NTI and visitors are encouraged to use them for conversations with persons served.

Job Development/Placement staff address privacy issues in off-site conversations with persons served to the extent feasible at the site which is most often a private business.

Hearing protection is available to reduce distraction in noisy settings. Seating or workstation arrangements are also made to reduce distraction when necessary and appropriate.

Winter gear is provided to staff and persons served who work outside during the winter.

Extra breaks are provided for those working in hot weather.

“Green” cleaners are used whenever possible, minimizing safety, allergy and physical health problems.

Initial job development and job assignment processes include inquiry regarding allergies, lighting, noise and other issues that the individual may find problematic and these are taken into account when making placement recommendations. Additional inquiries are made when conditions that may be expected to be problematic such as occasional use of cleaners with strong odors are likely to be encountered.

Attitudinal Barrier Removal

Treating persons served with dignity and respect and the use of "person first" language are concepts embedded in our staff orientation, code of ethics and training materials and employed throughout the organization.

Our Job Development/Placement staff make every effort to recognize and address attitudes of employers and coworkers which may negatively impact placement or job retention.

When community members witness success of persons served who work for or have been placed with other employers by NTI understanding and acceptance of persons with disabilities is naturally broadened.

It is our intention as specifically noted in our employee code of ethics, to portray persons with disabilities in an honest, respectful, and positive light in all professional and public materials. This intent is on our website with a request for visitors comments should we fail in this regard.

Financial Barrier Removal

While services are provided on a fee-for-service basis, Northern Transitions, Inc. holds the value of the service to the individual above financial benefit to the company. Service fees are

established at reasonable rates based upon service costs, state averages for comparable services and available support.

Individuals applying for or inquiring about services are assisted in obtaining funding for which they qualify. When public funding for services is not available (quickly becoming the rule rather than the exception), NTI attempts to meet the individual's service needs while requesting little or no reimbursement.

- ▶ Such decisions are made on a case-by-case basis considering benefit to the individual, actual service costs and other considerations with regard to the individual's work.
- ▶ In FY 2016, unfunded services were provided to 15 individuals at Chippewa County Recycling as opposed to 13 in 2014.
- ▶ In FY 2016, unfunded services were provided to 24 individuals on janitorial sites as opposed to 15 in 2014.

When work related personal expenses would be incurred by persons served, (as in the case of winter gear for outside work) NTI will offer this equipment on a free loan basis. Uniforms are provided free of charge to persons served on janitorial crews.

Northern Transitions, Inc. is continuously seeking new opportunities and developing its businesses and subcontracting arrangements to reduce reliance on service fees. During the 2016 fiscal year, only 6.3% of NTI's consolidated revenue came from service fees, as opposed to 7% in 2014.

We take pride in our efforts to improve the financial independence of persons served by providing profitable employment opportunities. In fiscal year 2016, NTI paid over \$596,000 in wages to persons served. Those served in Job Development/Placement earned \$129,000 working for other local employers.

Through involvement with the Ticket-to-Work program, staff have become familiar with the impact of earned income on SSI and SSDI benefits. Persons served through Ticket-to-Work are automatically provided with or referred for benefits counseling at the onset of services. Others are provided with this income/benefits information are provided with the same upon request.

Employment Barrier Removal

In the course of daily operations, NTI's Job Development/Placement staff directly address removal of and accommodation for identified barriers to community employment. Individuals are assisted in identification of interests, job search, resume development, completion of applications, interview preparation, on-the-job training and follow along to ensure success.

Job interview preparation includes discussion and planning regarding methods and extent to which information about the individual's conditions will be released/explained to employers.

This decision includes consideration of the individual's understanding, communication skills and comfort levels regarding release of this information and the impact this information might have on the individual's ability to meet the obligations of the job.

Our commitment to equal employment opportunity for persons with disabilities and protected veterans, including veterans with disabilities is expressed in NTI's Affirmative-Action Plan.

Applicants for all staff positions are now being offered the option to voluntarily self-identify as a person with a disability in the application process so that accommodations may be provided within the application process and during employment as necessary.

Pre-offer self identification forms are removed from the applications prior to interview.

Through its business operations, Northern Transitions, Inc. provides many employment opportunities for persons served who require accommodations not available in other employment settings.

During the application process, interviewers will ask if the applicant is able to perform the essential functions of the job and emphasize our compliance with the ADA in regard to providing reasonable accommodations.

When it appears that an individual applying for a position might benefit from services, the Rehabilitation Director is consulted and the possibility of applying for services, and difference between employment as staff or as a person served is discussed with the applicant. It is explained that NTI offers special consideration for individuals with significant disabilities who apply for work here.

NTI provides reasonable accommodations for persons served and personnel upon recognition of conditions that interfere with individual's ability to efficiently and effectively perform their work or benefit from services provided.

In addition, persons with disabilities are encouraged to apply for job openings at NTI for which they are otherwise qualified. Jobs are posted at locations frequented by individuals with disabilities or other barriers and persons with disabilities are given preference over undiagnosed individuals in selection process.

Only jobs requiring driving to perform an essential function indicate necessity of a drivers license in mandatory qualifications.

Transportation Barrier Removal

NTI's primary service locations are easily accessible by public transportation. In fact, our primary site is a regular pickup point for the local Transportation Authority.

In the normal course of service provision, NTI staff will instruct and assist persons served in obtaining and using public transportation (EUPTA, Dial-a-Ride), or making alternate arrangements (arranging rides with coworkers, taxi, etc.). Instruction and practice in using bus tickets and safe and appropriate interaction with drivers and other riders is provided.

Job Development/Placement staff and crew supervisors will pick up and/or transport persons served to and from work, when doing so places no unreasonable burden on other persons served or the organization.

Northern Transitions, Inc. maintains marked, accessible parking spaces for each owned location in line with local regulations and availability of space.

NTI staff and persons served participate in an annual ridership review meeting to express and receive assistance with any problems noted yet to be resolved, suggest improvements and receive updates with regard to any proposed changes in service, accessibility and such.

Communication Barrier Removal

NTI will provide accommodations for receptive and expressive communication barriers, as needed and requested, to persons served, their families, personnel and other stakeholders.

Northern Transitions, Inc. strives to provide materials and services in a format accessible to persons served, potential clientele, stakeholders and the general public. Service descriptions and reports are available on-hand in digital format, and large print etc. from our office or website.

NTI continuously reviews and updates its website to improve accessibility of information provided for individuals using assistive technology.

Interactive communication has been improved through addition of NTI's Facebook page NorthernTransitionsInc. Among other things, this account is used to celebrate achievements of persons served and the organization.

NTI's website provides a number of links to organizations that offer services and assistance in obtaining and using accommodations for home and work issues.

A TTY is available for individuals with communication disabilities including the deaf and hearing impaired.

NTI Service Barrier Removal

NTI makes every effort to identify and remove barriers to participation in our services.

Input regarding barriers to participation in NTI's services is sought during the application process, through satisfaction surveys and through opportunities to comment in the process of completing periodically recurring paperwork.

Barriers to participation and services are addressed as quickly and efficiently as is reasonably possible.

Staff (up to and including the Executive Director) maintain an open door policy, encouraging persons served to make requests or suggestions regarding any concern they might have.

Outcomes from FY 2015 Accessibility Plan

Physical Accessibility

Bathroom doors at recycling had been converted from round knobs to levers. Higher grade levers now used – previous levers were broken.

Ongoing: Re-measured all interior doors to ensure that no more than 5 foot pounds of pressure were required for operation.

Accessibility of Programs and Services

Ongoing: Continued addressing transportation problems on a case-by-case basis. This includes staff providing some support for individuals learning to use local public transportation, and discussion of appropriate behavior while using public transportation.

Employment Practice

Ongoing: Job descriptions were/are reviewed annually in conjunction with performance reviews. At these times, elements listed as “mandatory qualifications” will be reviewed to ensure that items such as “ valid drivers license” are only listed as required qualifications if they are in fact required in order to perform an essential function of the job.

Website

Ongoing: References to persons with disabilities continue to emphasize abilities and productive potential.

Communications

No needs for additional communication accommodations were identified.

Meetings and conferences

One Board member with limited mobility receives transportation assistance to and from Board functions.

Prioritizing Barriers

The following criteria were used to prioritize identified barriers.

- Weight = 3 (address these first)
 - Barrier has an impact on the safety of persons served or staff.
 - Barrier presents a high degree of inaccessibility.
 - Barrier is feasible to remove.

- Weight = 2
 - Barrier has an impact on and is relevant to our primary populations.
 - Removal of the barrier will impact a significant number of people.
 - Barrier does not meet current code or regulation.

- Weight = 1
 - Barrier of minimal or isolated impact, poses undue hardship or can be addressed on an as-needed basis

Goals for FY 2018

Physical Accessibility

- ▶ Carried forward: Lower counter tops to between 28 and 34 inches (required only if dining room is otherwise altered). (1)

- ▶ Ongoing: Re-measure all interior doors to ensure that no more than 5 foot-pounds of pressure are required for operation. (3)

Financial Accessibility

- ▶ Better align services and service population with NTI's business activities to reduce reliance on service funding. (2)

- ▶ Investigate expansion of reliance on Ticket-to-Work if Michigan Rehabilitation Services holds to its recent decision not to fund placement of individuals on NTI contracts. Currently, MRS claims the tickets of individuals they work with which has reduced our opportunities to seek Social Security funding through Ticket-to-Work. (2)

Accessibility of Programs and Services

- ▶ Ongoing: Continue addressing transportation problems on a case-by-case basis. (1)
- ▶ Provide staff at the main recycling drop site during peak usage times to assist with unloading and education. (2)

Employment Practices

- ▶ Ongoing: Ensure that new and revised policies, procedures, plans and forms address accessibility concerns such as:
 - ▶ Use of "provided in writing or alternative format upon request" rather than "provided in writing". (2)
 - ▶ Use of "written response --preferred method accepted" rather than "written response". If a written record of the response is required, that response will be written as dictated and read back to the individual for signature. (2)

Website (Apply the following to pages that are frequently used first)

- ▶ Continue to expand emphasis on the abilities and productive potential of persons served on the website. (3)
- ▶ Continue Review through sites such as
 - ▶ W3C Web Accessibility Initiative <http://www.w3.org/WAI/> and
 - ▶ WAVE web accessibility evaluation tool <http://wave.webaim> . (2)
- ▶ Ensure that new and revised content includes functional alt tags for all graphics, charts etc. which convey the same information as the graphics, charts etc. unless that information is presented in nearby text. (1)

Communications

- ▶ Identify sources of accommodation equipment and support if it should be needed. (1)
 - ▶ applicable SDS sheets are available in digital format so that a person with a visual impairment can enlarge their display.

Meetings and Conferences

- ▶ Inquire as to whether members of any group that meets here would appreciate any reasonable accommodations for members with disabilities. (3)
 - ▶ Invitations to organizational gatherings should include: inquiry regarding need for accommodations for communication, transportation, diet (when meals are served).
 - ▶ Estimated ending time for those who need to arrange transportation.

- ▶ When prearranged materials are used (notes, PowerPoint etc.) they should be made available in advance for individuals with learning or communication barriers. (1)
- ▶ Be prepared to provide a few large print copies of materials provided at meetings or special events. (1)

Barrier Removal Requests and Responses

- ▶ Occasionally, individuals dropping off materials at Recycling will request assistance in unloading their vehicles. Recycling staff accommodate such requests during normal business hours.

Evidence of Input and Approval

- ▶ In the most recent 12 month assessment 100% of those individuals who responded indicated satisfaction with accessibility of services.
- ▶ This plan to be provided to the Board for review and acceptance on May 16, 2017

Credits

- ▶ Assessment Categories - CARF Guide to Accessibility and 2016 CARF Employment and Community Services Manual.
- ▶ Prioritization of Barriers system adopted from – Toronto Rehabilitation Institute accessibility plan <http://www.torontorehab.com>
- ▶ Website Accessibility Information - W3C Web Accessibility Initiative <http://www.w3.org/WAI/>
- ▶ Legal requirements – ADA Title III Technical Assistance Manual: <http://www.ada.gov/taman3.html#III-7.3000>

Karl E. Monroe
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04/27/2017
Date