



ST. TAMMANY PARISH

MICHAEL B. COOPER
PARISH PRESIDENT

April 18, 2024

Please find the following addendum to the below mentioned RFP.

Addendum No.: 1

RFP#: 24-4-3

Project Name: Home Repair Program

RFP Due Date: April, 23, 2024

QUESTIONS AND ANSWERS:

Question 1: For the scope of work, is STPHRP looking for execution of home repairs on an as needed basis or would this be an assessment of the current state in the Parish?

Answer 1: The services requested will be on an as-needed basis, not an assessment of current state of the parish.

Question 2: For each of improvement, what documentation would be required in order to execute renovations? Would engineered drawings be required as well as corresponding permitting?

Answer 2: Construction estimate and requirements needed for permit depending on the type of work.

Question 3: Is there a current estimate on the number of homes identified that require renovation? If so, has an assessment been performed? Or does that fall under the scope of work to identify and assess homes within the parish for this program?

Answer 3: 20 – 30 assessments may be required for some of them.

Question 4: Who will be responsible for receiving the applications and verifying the submitted documents?



ST. TAMMANY PARISH

MICHAEL B. COOPER
PARISH PRESIDENT

Answer 4: Contractor responsible for intake.

Question 5: Do we have the number of homes that will be repaired within the terms of the agreement?

Answer 5: Currently 25 or so on the list. Thinking more will be coming in post recent storms.

Question 6: Is any bonding required? I see no performance bond is required just would like to verify that no other bonding is required.

Answer 6: No other bonding is required, just insurance requirements.

Question 7: On attachment A (RFP Pricing Sheet) solely include ONLY the administrative and project management cost? Or does that include the cost of repairing the home as well? If home repairs are included, is there a scope of work for each project?

Answer 7: Scope done on each house as the property owner applies, budget per home is \$15000 max and is included in program expenses.

Question 8: If we have not provided this exact service with a total of 5 other public jurisdictions will we still be able to qualify for the award of this contract?

Answer 8: Can participate, however, will be considered in the evaluation of selected contractor.

Question 9: Can you please provide the following Manuals?

- Adhere to the Parish's Section 3 Compliance Manual and all applicable Section 3 program requirements. (Manual available upon request.)
- Adhere to the Parish's Section 504 Compliance Manual and all applicable Section 504 program requirements. (Manual available upon request.)

Answer 9: Manuals provided as attachments.

Question 10: I am requesting a copy of Section 3 & Section 504 of the Parish ???s Compliance Manual.

Answer 10: Manuals provided as attachments.



ST. TAMMANY PARISH

MICHAEL B. COOPER
PARISH PRESIDENT

Question 11: Please specify whom will make the final determination on eligibility of the LMI applicant?

Answer 11: Awardee is responsible for intake and final determination. Awardee will need to verify LMI eligibility.

Question 12: Once LMI applicant is approved and eligible, whom will decide which of the LMI applicants will receive home repairs under this program?

Answer 12: Awardee will decide which of the LMI applicants will receive repair.

Question 13: Does the Parish currently have an approved list of LMI applicants for consideration under this program?

Answer 13: We do not have an approved/eligible list. Awardee will do client intake and verify eligibility.

Question 14: Will the awardee be required to determine what repair scope will be provided for each home?

Answer 14: Since awardee is doing client intake, scope will be done on each house as the property owner applies.

Question 15: Is the intent for the awardee to provide an estimate of repair cost for each home?

Answer 15: Awardee will have to get prior authorization if the cost repair for exceeds \$15,000.

ATTACHMENTS:

1. Parish's Section 3 Compliance Manual, pdf.
2. Parish's Section 504 Compliance Manual, pdf.

End of Addendum # 1



A Compliance Guide to Section 3 Requirements

St. Tammany Parish Government
Department of Grants

Table of Contents

Section 3 Plan

| | |
|---|-----------|
| 1. Overview of Section 3 Requirements | 2 |
| A. What is Section 3? | 2 |
| B. Purpose of Document | 2 |
| C. Applicability | 2 |
| 2. Employment, Training, and Contracting Goals | 3 |
| A. Safe Harbor Compliance | 3 |
| B. Safe Harbor Benchmarks | 3 |
| C. Certification of Prioritization of Effort for Employment, Training, and Contracting | 4 |
| D. Good Faith Effort | 4 |
| 3. Section 3 Eligibility and Certifications | 5 |
| A. Section 3 Worker and Targeted Section 3 Worker Certification | 6 |
| B. Section 3 Business Concern Certification | 6 |
| 4. Assisting Contractors with Achieving Section 3 Goals | 7 |
| 5. Section 3 Outreach | 7 |
| A. Outreach Efforts for Employment and Training | 7 |
| 6. Responsibilities | 8 |
| A. Subrecipient | 8 |
| B. Contractors | 8 |
| C. St. Tammany Parish | 9 |
| 7. Section 3 Provisions/Contract Language | 9 |
| 8. Reporting Requirements | 9 |
| A. Monthly Reporting | 10 |
| B. Annual Reporting | 10 |
| C. Reporting on Projects with Multiple Funding Sources | 10 |
| 9. Internal Section 3 Complaint Procedure | 10 |
| 10. Appendices | 12 |
| Appendix A. Definitions | 12 |
| Appendix B. Multiple Funding Sources Chart | 14 |
| Appendix C. Flow Chart to Determine Compliance | 15 |
| Appendix D. Forms | 16 |

1. Overview of Section 3 Requirements

A. WHAT IS SECTION 3?

Section 3 is a provision of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) that is regulated by the provisions of 24 CFR 75. Section 3 regulations ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons.

B. PURPOSE OF THIS DOCUMENT

As a Community Development Block Grant (CDBG) entitlement community, St. Tammany Parish is required to comply with the Section 3 provision of the Housing and Urban Development Act of 1968. The purpose of this manual is to provide a guide of Section 3 requirements. The manual provides a description of the requirements and a copy of the forms that must be completed for compliance.

This plan outlines how St. Tammany Parish and its subrecipients, contractors and subcontractors will comply with HUD's Section 3 requirements. Recipient will, to the greatest extent feasible, ensure that employment and other economic opportunities are directed to low- and very low-income persons (Section 3 workers and Targeted Section 3 workers) and to eligible businesses (Section 3 Businesses) and requires the same of its contractors.

St. Tammany Parish may amend its Section 3 Policies and Procedures document as necessary to ensure continued compliance with HUD's requirements and/or to reflect updated Section 3 guidance and outreach strategies.

C. APPLICABILITY

For housing and community development financial assistance, this plan applies to housing rehabilitation, housing construction, and other public construction projects that exceed \$200,000 or more of housing and community development financial assistance from one or more HUD programs.

All recipients of professional service contracts in excess of \$100,000 provided that the work to be performed is generated by the expenditure of HUD assistance and arises in connection with projects involving housing rehabilitation, housing construction, or other public construction.

For projects funded with Lead and Hazard Control and Healthy Homes Programs, this plan applies to projects that exceed \$100,000.

This plan also applies to projects that include multiple funding sources. Multiple funding source projects include projects that include public housing financial assistance, housing and community development financial assistance for single or multiple recipients, and the Lead Hazard Control and Healthy Homes Program.

Section 3 requirements **do not** apply to: 1) Material Supply Contracts - § 75.3(b), 2) Indian and Tribal Preferences - § 75.3(c), and 3) Other HUD assistance and other Federal assistance not subject to Section 3 §75.3 (d). However, for financial assistance that is not subject to Section 3, recipients are encouraged to consider ways to support the purpose of Section 3.

See Appendix C for Flow Chart provided by U.S. Department of Housing and Urban Development.

2. Employment, Training, and Contracting Goals

A. SAFE HARBOR COMPLIANCE

Recipient will be considered to have complied with the Section 3 requirements and met safe harbor, if they certify that they followed the required prioritization of effort and met or exceeded the Section 3 benchmarks, absent evidence of the contrary.

Prior to the beginning of work, contractors and subcontractors will be required to certify that they will follow the required prioritization of effort for Section 3 workers, Targeted Section 3 workers, and Section 3 business concerns as outlined below in [section C](#). After completion of the project, on the Section 3 Cumulative Report, contractors and subcontractors will be required to certify that they followed the prioritization of effort requirements.

If the contractor and subcontractor does not meet the safe harbor requirements, they must provide evidence that they have made qualitative efforts to assist low and very low-income persons with employment and training opportunities.

B. SAFE HARBOR BENCHMARKS

Recipient has established employment and training goals that subrecipients, contractors, and subcontractors should meet in order to comply with Section 3 requirements outlined in or [24 CFR Part 75.19]. The safe harbor benchmark goals are as follows:

- 1) Twenty-five (25) percent or more of the total number of labor hours worked by all workers on a Section 3 project are Section 3 workers;

$$\text{Section 3 Labor Hours/Total Labor Hours} = 25\%$$

And

- 2) Five (5) percent or more of the total number of labor hours worked by all workers on a Section 3 project are Targeted Section 3 workers, as defined at 24 CFR Part 75.21.

$$\text{Targeted Section 3 Labor Hours/Total Labor Hours} = 5\%$$

HUD establishes and updates Section 3 benchmarks for Section 3 workers and/or Targeted Section 3 workers through a document published in the Federal Register, not less frequently than once every 3 years. Given that the Section 3 benchmarks are subject to change every three years or sooner, St. Tammany Parish will review and update the Section 3 Plan, as needed.

It is the responsibility of contractors to implement efforts to achieve Section 3 compliance. Any contractor that does not meet the Section 3 benchmarks must demonstrate why meeting the benchmarks were not feasible. All contractors submitting bids or proposals to St. Tammany Parish Government are required to certify that they will comply with the requirements of Section 3.

C. CERTIFICATION OF PRIORITIZATION OF EFFORT FOR EMPLOYMENT, TRAINING, AND CONTRACTING

EMPLOYMENT AND TRAINING

Under the Section 3 Program, contractors and subcontractors should make best efforts to provide employment and training opportunities to Section 3 workers in the priority order listed below:

Provide employment and training opportunities to Section 3 workers within St. Tammany Parish in which the project is located in the priority order listed below:

- 1) Section 3 workers residing within the service area or the neighborhood of the project, and
- 2) Participants in YouthBuild programs.

Contractors and subcontractors will be required to certify that they will and have made best efforts to follow the prioritization of effort requirements prior to the beginning work and after work is completed.

CONTRACTING

Under the Section 3 Program, contractors and subcontractors must make their best efforts to award contracts and subcontracts to business concerns that provide economic opportunities to Section 3 workers in the following order or priority:

- 1) Business concerns that provide economic opportunities to Section 3 workers residing within St. Tammany Parish in which assistance is located in the following order of priority (*where feasible*):
 - a) Section 3 business concerns that provide economic opportunities to Section 3 workers residing within the service area or the neighborhood of the project; and
 - b) YouthBuild programs.

Contractors and subcontractors will be required to certify that they will and have made best efforts to follow the prioritization of effort requirements prior to the beginning work and after work is completed.

D. Good Faith Effort

If the subrecipient, contractor and subcontractor have the need to hire new persons to complete the Section 3 covered contract or need to subcontract portions of the work to another business, they are required to direct their newly created employment and/or subcontracting opportunities to Section 3 residents and businesses.

The Parish will verify that the contractor and subcontractor have demonstrated a good faith effort to comply with Section 3 requirements. Subrecipients, contractors, and subcontractors shall retain all records associated with all attempts to provide a good faith effort and provide the Parish and HUD with these records upon request.

Actions taken to comply with the employment and training requirements of Section 3 and the results of actions taken and impediments encountered should be documented. Subrecipients and contractors should maintain records of job vacancies, solicitation for bids or proposals, selection materials, and contract documents. The documentation should demonstrate efforts taken towards the achievement of the Section 3 numerical goals.

Examples of actions demonstrating a “good faith” effort include:

1. Targeted recruitment of Section 3 residents and businesses by:
 - A. Notice of vacant training and employment positions arising out of work to be performed under Section 3 covered projects shall contain the following statement: “In compliance with Section 3 of the Housing and Urban Development Act of 1968, as amended, training and employment opportunities arising out of a project assisted under a program providing direct financial assistance from the U.S. Department of Housing and Urban Development shall be given, to the greatest extent feasible, to low-income residents or businesses owned by low-income residents of St. Tammany Parish. Low-income residents or businesses owned by low-income residents of St. Tammany Parish are encouraged to apply.”
 - B. The notice shall be provided for at least two weeks.
 - C. The notice shall contain the name, mailing address, telephone number, and website of the contracting firm.
 - D. The notice shall be provided to local newspapers, websites, radio advertising, neighborhood publications, minority publications, trade publications, and associations. The notice may also be posted at the job site or directly to a list of Section 3 businesses.

3. Section 3 Eligibility and Certifications

To qualify as a Section 3 worker, Targeted Section 3 worker or a Section 3 business concern, each must self-certify that they meet the applicable criteria.

Businesses who misrepresent themselves as Section 3 business concerns and report false information to St. Tammany Parish may have their contracts terminated as default and be barred from ongoing and future considerations for contracting opportunities.

A. SECTION 3 WORKER AND TARGETED SECTION 3 WORKER CERTIFICATION

A Section 3 worker seeking certification shall submit self-certification documentation to the recipient contractor or subcontractor, that the person is a Section 3 worker or Targeted Section 3 worker as defined in 24 CFR Part 75. For the purposes of Section 3 worker eligibility, St. Tammany Parish will use individual income rather than family/household income to determine eligibility. The income limits will be determined annually using the guidelines published at <https://www.huduser.org/portal/datasets/il.html>.

Persons seeking the Section 3 worker preference shall demonstrate that it meets one or more of the following criteria currently or when hired within the past five years, as documented:

- 1) A low or very low-income resident (the worker's income for the previous or annualized calendar year is below the income limit established by HUD); or
- 2) Employed by a Section 3 business concern; or
- 3) A YouthBuild participant.

Persons seeking the Targeted Section 3 worker preference shall demonstrate that it meets one or more of the following criteria:

- 1) Employed by a Section 3 business concern or
- 2) Currently meets or when hired met at least one of the following categories as documented within the past five years:
 - a) Living within the service area or the neighborhood of the project, as defined in 24 CFR Part 75.5; or
 - b) A YouthBuild participant.

Section 3 workers and Targeted Section 3 workers who are seeking preference in training and employment must submit the Section 3 Worker and Targeted Section 3 Worker Certification Form.

B. SECTION 3 BUSINESS CONCERN CERTIFICATION

Businesses that believe they meet the Section 3 Business requirements can may self-register in the HUD Business registry, here: <http://www.hud.gov/Sec3Biz>. Businesses may seek Section 3 Business Concern preference by demonstrating that it meets one or more of the following criteria:

- 1) At least 51 percent of the business is owned and controlled by low- or very low-income persons; or
- 2) At least 51 percent of the business is owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing; or
- 3) Over 75 percent of the labor hours performed for the business over the prior three-month period are performed by Section 3 workers.

Businesses that seek Section 3 preference shall certify, or demonstrate to St. Tammany Parish, contractors or subcontractors, that they meet the definitions provided in the above. Businesses may demonstrate eligibility by submitting the Section 3 Business Concern Certification Form, located in appendix.

Section 3 Business Concern Certification Forms must be submitted at the time of bid/proposal.

4. Assisting Contractors with Achieving Section 3 Goals

In an effort to assist contractors with meeting or exceeding the Section 3 goals, St. Tammany Parish will do the following:

- 1) Share Section 3 Plan with contractors and subcontractors' policies and procedures
- 2) Review Section 3 benchmarks and prioritization of effort with contractors and subcontractors to ensure that the goals are understood. It is not intended for contractors and subcontractors to terminate existing employees, but to make every effort feasible to meet Section 3 benchmark goals by utilizing existing qualified workforce and by considering qualified eligible Section 3 workers and Targeted Section 3 workers before any other person, when hiring additional employees is needed to complete proposed work to be performed with HUD program.
- 3) Inform contractors about the HUD Section 3 Opportunity Portal <https://hudapps.hud.gov/OpportunityPortal/>
- 4) Encourage local business to register on the HUD Business Registry and direct contractors to the HUD Section 3 Business Registry <https://www.hud.gov/section3businessregistry>

5. Section 3 Outreach

A. OUTREACH EFFORTS FOR EMPLOYMENT AND TRAINING

Contractors and subcontractors should employ several active strategies to notify Section 3 workers and Targeted Section 3 workers of Section 3 job opportunities, including:

- 1) Clearly indicating Section 3 eligibility on all job postings with the following statement: "This job is a Section 3 eligible job opportunity. We encourage applications from individuals that are low income and/or live in Public Housing and/or receive a Section 8 voucher";
- 2) Including the Section 3 Worker and Targeted Section 3 Worker Self-Certification Form in all job postings
- 3) Establishing a current list of Section 3 eligible applicants
- 4) Contacting local community organizations and provide them with job postings for Section 3 eligible applicants; and
- 5) Coordinating a programmatic ad campaign, which results in widespread job posting across diverse ad networks including:
 - a) Advertising job opportunities via social media, including LinkedIn and Facebook;
 - b) Advertising job opportunities via flyer distributions and mass mailings and posting ad in common areas of housing developments and all public housing management office

- c) Contacting resident councils, resident management corporations, and neighborhood community organizations to request their assistance in notifying residents of available training and employment opportunities

6. Responsibilities

A. Subrecipient

1) A subrecipient must comply with Section 3 requirements within its operation if it invests \$200,000 or more into projects and activities involving housing construction, rehabilitation, or other public construction. This responsibility includes:

- A) Notifying Section 3 residents and business concerns about jobs and contracts generated by Section 3 covered assistance so that they may submit bids/ proposals for available contracts and jobs opening with the subrecipient;
- B) Notify potential contractors of Section 3 requirements;
- C) Include the Section 3 Clause in all applicable contracts;
- D) Document action(s) taken to meet the numerical goals.
- E) Complete and submit the following forms/reports when the assistance exceeds \$200,000: Subrecipient Work Force Breakdown Form and Income Certification Form for Section 3 Residents (should low-income residents of St. Tammany Parish submit a job application for a project-related new hire position).

2) Subrecipients have a responsibility to “ensure compliance” of their contractors and subcontractors. This means that a subrecipient must:

- A) Notify contractors of their responsibilities under Section 3 including, but not limited to, incorporating the Section 3 Clause in all contract documents;
- B) Refrain from contracting with subcontractors as to whom they have received notice or have knowledge that the subcontractors have been found in violation of the requirements of 24 CFR Part 135;
- C) Respond to Section 3 complaints;
- D) Cooperate with St. Tammany Parish and HUD in obtaining compliance of contractors and subcontractors when allegations are made of noncompliance
- E) Complete and submit the following forms/reports when the assistance exceeds \$200,000: Subrecipient Contract Award Summary Report.

B. Contractors

1) Notify subcontractors of their responsibilities under Section 3 including, but not limited to, incorporating Section 3 Clause in subcontract documents

- 2) Refrain from contracting with subcontractors as to whom they have received notice or have knowledge that the subcontractors have been found in violation of the requirements of 24 CFR Part 135;
- 3) If the contractor has the need to hire new persons to complete the Section 3 covered contract or needs to subcontract portions of the work to another business, they are required to direct their newly created employment and/or subcontracting opportunities to Section 3 residents and business concerns. Maintain records that document a good faith effort to utilize Section 3 residents and business concerns. This is required of both contractor and subcontractor;
- 4) Document action(s) taken to meet the numerical goals;
- 5) Complete and submit the Contractor Section 3 Certification Form prior to bid opening;
- 6) Complete and submit the following reports/ forms when the assistance exceeds \$100,000: Contractor Work Force Breakdown, Contractor Section 3 Certification Form, and Income Certification Form for Section 3 Residents (should low-income residents of St. Tammany Parish submit a job application for a project-related new hire position).

C. St. Tammany Parish

The Parish shall assist the subrecipient, contractors and subcontractors by performing the following activities:

- 1) Notifying all applicants for CDBG projects of the Section 3 applicability;
- 2) "Section 3 Clause" shall be included in all applicable bids, agreements and contracts;
- 3) Providing clarification of Section 3 requirements;
- 4) Providing the appropriate guidelines and forms;
- 5) Assisting subrecipients, contractors and subcontractors with notifying Section 3 residents and business concerns of new opportunities;
- 6) Monitoring, verifying and notifying with regard to compliance;
- 7) Moderate Section 3 complaints;
- 8) Collect all applicable forms and reports;
- 9) Report all required data to HUD.

7. Section 3 Provisions/Contract Language

Contractors and subrecipients are required to include language in all Section 3 covered contracts or agreements for subcontractors to meet the requirements of 24 CFR Part 75.19.

For businesses, noncompliance with HUD's regulations in 24 CFR part 75 may result in sanctions, termination of this contract for default, and debarment or suspension from future HUD assisted contracts.

8. Reporting Requirements

For Section 3 covered contracts, contractors must submit the Section 3 Performance and Summary

Report to St. Tammany Parish on a monthly basis, and the annual reporting requirement set forth in that form's instructions.

A. MONTHLY REPORTING

- 1) Contractors are required to submit monthly activity reports to St. Tammany Parish Department of Grants.

B. ANNUAL REPORTING

- 1) Once a project is completed, contractors must submit a final Section 3 cumulative report for the program year.
- 2) Upon the completion of a project, St. Tammany Parish Department of Grants will conduct a final review of the project's overall performance and compliance.
- 3) St. Tammany Parish Department of Grants will submit the Section 3 data to HUD.

C. REPORTING ON PROJECTS WITH MULTIPLE FUNDING SOURCES

- 1) For Section 3 projects that include public housing financial assistance and housing and community development financial assistance, recipient will report on the project as a whole and will identify the multiple associated recipients.
- 2) For projects assisted with funding from multiple sources of housing and community development assistance that exceed the thresholds of \$200,000 and \$100,000 for Lead Hazard Control and Healthy Homes Programs (LHCHH), St. Tammany Parish will follow subpart C of Part 75 and will report to the applicable HUD program office, as prescribed by HUD. Note: LHCHH assistance is not included in calculating whether the assistance exceeds the \$200,000 threshold. HUD housing and community development financial assistance is not included in calculating whether the assistance exceeds the LHCHH \$100,000 threshold. Refer to chart in [Appendix B](#).

9. Internal Section 3 Complaint Procedure

In an effort to resolve complaints generated due to non-compliance through an internal process, St. Tammany Parish encourages submittal of such complaints to Department of Grants as follows:

- 1) Complaints of non-compliance should be filed in writing and must contain the name of the complainant and brief description of the alleged violation of 24 CFR Part 75.
- 2) Complaints must be filed within 120 calendar days after the complainant becomes aware of the alleged violation.
- 3) An investigation will be conducted if complaint is found to be valid. St. Tammany Parish will conduct an informal, but thorough investigation affording all interested parties, if any, an opportunity to submit testimony and/or evidence pertinent to the complaint.
- 4) If complainants wish to have their concerns considered outside of St. Tammany Parish, a complaint may be filed with:

The HUD program office responsible for the public housing financial assistance or the Section 3 project, or to the local HUD field office. These offices can be found through the HUD website, www.hud.gov/.

Complainants may be eligible to bring complaints under other federal laws. The U.S. Equal Employment Opportunity Commission (EEOC) is responsible for enforcing federal laws that make it illegal to discriminate against a job applicant or an employee because of the person's race, color, religion, sex (including pregnancy), national origin, age (40 or older), disability or genetic information (medical history or predisposition to disease). For more information about complainant rights, please contact EEOC at: www.EEOC.gov.

The Department of Labor Office of Federal Contract Compliance Programs (OFCCP) enforces, for the benefit of job seekers and wage earners, the contractual promise of affirmative action and equal employment opportunity required of those who do business with the Federal government. More information about the services they provide can be obtained at: <http://www.dol.gov/ofccp/>.

10. Appendices

APPENDIX A: DEFINITIONS

The terms *HUD*, *Public housing*, and *Public Housing Agency (PHA)* are defined in 24 CFR part 5.

The following definitions also apply to 24 CFR Part 75 HUD's Economic Opportunities for Low-and Very Low-Income Persons:

1937 Act means the United States Housing Act of 1937, 42 U.S.C. 1437 *et seq. activities related to Public Housing*

Contractor means any entity entering into a contract with:

- (1) A recipient to perform work in connection with the expenditure of public housing financial assistance or for work in connection with a Section 3 project; or
- (2) A subrecipient for work in connection with a Section 3 project.

Labor hours means the number of paid hours worked by persons on a Section 3 project or by persons employed with funds that include public housing financial assistance.

Low-income person means a person as defined in Section 3(b)(2) of the 1937 Act, at or below 80% AMI. Note that Section 3 worker eligibility uses individual income rather than family/household income.

Material supply contracts means contracts for the purchase of products and materials, including, but not limited to, lumber, drywall, wiring, concrete, pipes, toilets, sinks, carpets, and office supplies.

Professional services means non-construction services that require an advanced degree or professional licensing, including, but not limited to, contracts for legal services, financial consulting, accounting services, environmental assessment, architectural services, and civil engineering services.

Public housing financial assistance means assistance as defined in 24 CFR Part 75.3(a)(1).

Public housing project is defined in 24 CFR 905.108.

Recipient means any entity that receives directly from HUD public housing financial assistance or housing and community development assistance that funds Section 3 projects, including, but not limited to, any State, local government, instrumentality, PHA, or other public agency, public or private nonprofit organization.

Section 3 means Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701u).

Section 3 business concern means:

- (1) A business concern meeting at least one of the following criteria, documented within the last six-month period:
 - (i) It is at least 51 percent owned and controlled by low- or very low-income persons;
 - (ii) Over 75 percent of the labor hours performed for the business over the prior three-month period are performed by Section 3 workers; or
 - (iii) It is a business at least 51 percent owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing.

(2) The status of a Section 3 business concern shall not be negatively affected by a prior arrest or conviction of its owner(s) or employees.

(3) Nothing in this part shall be construed to require the contracting or subcontracting of a Section 3 business concern. Section 3 business concerns are not exempt from meeting the specifications of the contract.

Section 3 Coordinator is person tasked with overseeing all Section 3 responsibilities for the PHA/CD office.

Section 3 project means a project defined in 24 CFR Part 75.3(a)(2).

Section 3 worker means:

(1) Any worker who currently fits or when hired within the past five years fit at least one of the following categories, as documented:

(i) The worker's income for the previous or annualized calendar year is below the income limit established by HUD.

(ii) The worker is employed by a Section 3 business concern.

(iii) The worker is a YouthBuild participant.

(2) The status of a Section 3 worker shall not be negatively affected by a prior arrest or conviction.

(3) Nothing in this part shall be construed to require the employment of someone who meets this definition of a Section 3 worker. Section 3 workers are not exempt from meeting the qualifications of the position to be filled.

Section 8-assisted housing refers to housing receiving project-based rental assistance or tenant-based assistance under Section 8 of the 1937 Act.

Service area or the neighborhood of the project means an area within one mile of the Section 3 project or, if fewer than 5,000 people live within one mile of a Section 3 project, within a circle centered on the Section 3 project that is sufficient to encompass a population of 5,000 people according to the most recent U.S. Census.

Small PHA means a public housing authority that manages or operates fewer than 250 public housing units.

Subcontractor means any entity that has a contract with a contractor to undertake a portion of the contractor's obligation to perform work in connection with the expenditure of public housing financial assistance or for a Section 3 project.

Subrecipient has the meaning provided in the applicable program regulations or in 2 CFR 200.93.

Targeted Section 3 worker has the meanings provided in 24 CFR Part 75.11, 75.21, or 75.29, and does not exclude an individual that has a prior arrest or conviction.

Very low-income person means the definition for this term set forth in section 3(b)(2) of the 1937 Act (at or below 50% AMI).

YouthBuild programs refers to YouthBuild programs receiving assistance under the Workforce Innovation and Opportunity Act (29 U.S.C. 3226).

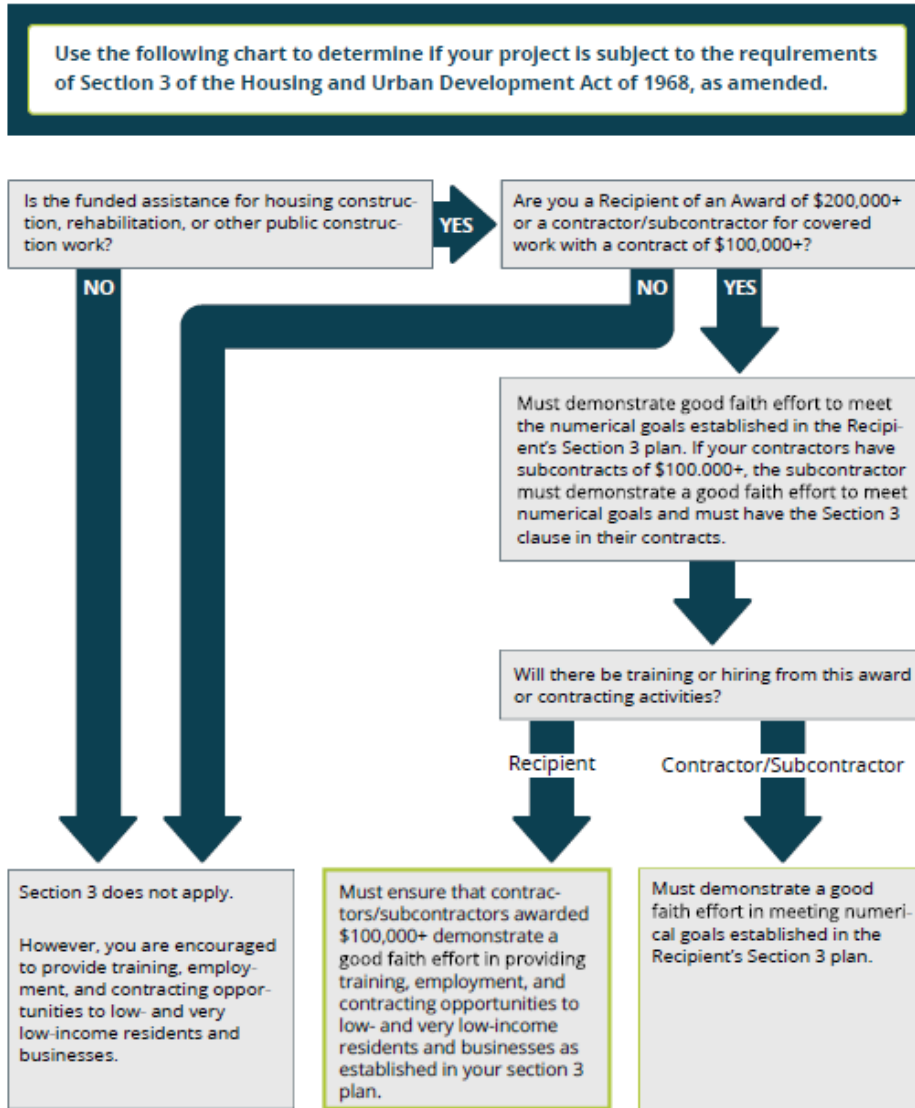
APPENDIX B: MULTIPLE FUNDING SOURCES - CHART

| TYPE OF FINANCIAL ASSISTANCE | DEFINITIONS *TARGETED SECTION 3 WORKER | THRESHOLDS | PRIORITIZATION | REPORTING |
|--|--|--|----------------------------------|---|
| Multiple Sources of Housing and Community Development <i>(single or multiple recipients)</i> | Must follow subpart C of Part 75 | Exceeds \$200,000 for Section 3 projects *LHCHHP exceeds \$100,000 | Must follow subpart C of Part 75 | Must follow subpart C of Part 75 Must report on project as a whole and identify the multiple associated recipients Must report to the applicable HUD program office, as prescribed by HUD |

APPENDIX C: Flow Chart to Determine Compliance

Exhibit 3-1: Section 3 Flow Chart

NOTES



Section 3 requirements apply to the entire project or activity funded with Section 3 covered assistance, regardless of whether the Section 3 activity is fully or partially funded with Section 3 covered assistance.

APPENDIX D: FORMS

Workforce Breakdown

This form should be completed by the subrecipient/contractor and submitted to St. Tammany Parish at the completion of the reporting period or at the completion of work, whichever comes first.

Please print or type the following verification.

Name of Firm Representative: _____

Title of Firm Representative: _____

Signature: _____

Date: _____

Name of Firm: _____

Street Address: _____

City, State, Zip: _____

Telephone #: _____

E-mail: _____

Project Name: _____

| Job Category | Number of New Hires | Number of New Hires that are Section 3 Residents | % of Aggregate # of Staff Hours of New Hires that are Section 3 Residents | % of Total Staff Hours for Section 3 Employees and Trainees | Number of Section 3 Trainees |
|------------------------------------|---------------------|--|---|---|------------------------------|
| Professional | | | | | |
| Technical | | | | | |
| Office/Clerical | | | | | |
| Construction by Trade (list below) | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

| Contracts Awarded | |
|--|---------------|
| <i>Construction Contracts:</i> | <i>Number</i> |
| A. Number of \$100,000+ subcontracts awarded on this project | |
| B. Number of Section 3 business concerns submitting bids: | |
| C. Number of Section 3 business concerns awarded subcontracts: | |
| <i>Non-Construction Contracts:</i> | <i>Number</i> |
| A. Number of non-construction contracts awarded on this project: | |
| B. Number of Section 3 business concerns submitting bids: | |
| C. Number of Section 3 business concerns awarded contracts: | |

Indicate the efforts made to direct the unemployment and other economic opportunities generated by HUD financial assistance for housing and community development programs, to the greatest extent feasible, toward low and very low-income residents. Check all that apply. Submit evidence to demonstrate efforts made.

- Attempt to recruit Section 3 residents through: local advertising, media, signs prominently displayed at the project site, etc.
- Participated in a HUD program or other program which promotes the training of Section 3 residents.
- Participated in a HUD program or other program which promotes the award of contracts to business concerns which meet the definition of Section 3 business concern.
- Other; describe below:

Section 3 Certification

To be completed by the subrecipient/contractor/subcontractor. Please print the following verification:

Name of Firm Representative: _____

Title of Firm Representative: _____

Date: _____

Name of Firm: _____

Street Address: _____

City, State, Zip: _____

Telephone #: _____

Website: _____

The above signed representative hereby certifies that the above-mentioned firm:

- does not meet the definition of a Section 3 Business Concern. (STOP – do not need to go any further)

- meets the definition of a Section 3 Business Concern under at least one of the following qualifying basis:
 - is at least 51% or more owned by Section 3 residents;

 - whose permanent, full-time employees include persons, at least 30% of whom are currently Section 3 residents, or within 3 years of the date of first employment with the business were Section 3 residents; or

 - provides evidence of a commitment to subcontract in excess of 25% of the dollar award of all subcontracts to be awarded to a Section 3 business concern.

Section 3 Certification cont.

Attached is the following documentation as evidence of status:

For business claiming status as a Section 3 resident-owned enterprise:

- copy of resident lease
- copy of evidence of participation in a public assistance program
- copy of the receipt of public assistance
- other evidence

For business entity as applicable:

- copy of articles of incorporation
- assumed business name certification
- list of owners/ stockholders and % of ownership each
- organization chart with names and titles and brief function statement
- certificate of good standing
- partnership agreement
- corporate annual report
- latest board minutes appointing officers
- additional documents

For businesses claiming Section 3 status by subcontracting 25% of the dollar awarded to qualified Section 3 business:

- list of subcontracted Section 3 business(es) and subcontract amount

For businesses claiming Section 3 status, claiming at least 30% of their workforce are currently Section 3 residents or were Section 3 eligible residents within 3 years of date of first employment with the business:

- list of all current full-time employees
- PHA/ IHA residential lease less than 3 years from day of employment
- List of employees claiming Section 3 status
- Other evidence of Section 3 status less than 3 years from date of employment

Evidence of ability to perform successfully under the terms and conditions of the proposed contract:

- current financial statement
- statement of ability to comply with public policy
- list of owned equipment
- list of all contracts for the past two years

Certification:

I affirm that the above statements are true, complete, and correct to the best of my knowledge and belief. I understand that businesses who misrepresent themselves as Section 3 business concerns and report false information St. Tammany Parish may have their contracts terminated as default and be barred from ongoing and future considerations for contracting opportunities. I hereby certify, under penalty of law, that the following information is correct to the best of my knowledge.

Authorized Representative Signature

Date

| | | |
|--|---|---|
| Section 3 Housing and Community Development Employer Certification Form | U.S. Department of Housing and Urban Development Office of Field Policy and Management | HUD FORM 4736A OMB Approval Number 2501-0041 (Exp. 04/30/2025) |
|--|---|---|

(In compliance with Section 3 of the HUD Act of 1968 and 24 CFR Part 75)

Public reporting for this collection of information is estimated to average 0.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information.

Section 3 of the Housing and Urban Development Act of 1968, as amended by the Housing and Community Development Act of 1992 (Section 3), and 12 U.S.C. § 1701u ensure that employment and other economic opportunities generated by Federal financial assistance for housing and community development programs are, to the greatest extent feasible, directed toward low- and very low-income persons, particularly those who receive government assistance for housing. The regulations are found at 24 CFR Part 75. This collection of information is required in order to ensure that a worker can be certified as an eligible Section 3 worker as outlined in 24 C.F.R. § 75.31. The information will be used by the Department to ensure compliance with Section 3 of the HUD Act of 1968 employer certification requirements listed in 24 CFR § 75.31, to assess the results of the Department's efforts to meet the statutory objectives of Section 3, to prepare reports to Congress, and by recipients to ensure they are complying with their recordkeeping requirements found in the regulation, and as a self-monitoring tool.

Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to Anna P. Guido, Reports Management Officer, QDAM, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. XXXX-XXXX. HUD may not conduct and sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid control number. No assurances of confidentiality are provided for this information collection.

The purpose of this form is to comply with Section 3 of the HUD Act of 1968 employer certification requirements listed in 24 CFR § 75.31. To qualify as a Section 3 worker, the United States legal resident's annual income must not exceed the HUD income limits for the year before the worker was hired, or the individual's current income annualized on a full-time basis for the year must be below the HUD income limit. Additionally, an individual can qualify as a Section 3 worker and Targeted Section 3 worker, if an employee of a Section 3 Business Concern. To qualify as a Targeted Section 3 worker, an employer can confirm that the employee lives within the service area or neighborhood of the project.

Please provide the following information about the business/employer:

Name of Business: _____

Street Address _____ City _____ State _____ Zip _____

Phone #: _____ Email: _____

Please Provide the following information about the worker/employee:

Printed Name of Worker: _____

Street Address (Not a PO Box) _____ Apt# _____ City _____ State _____ Zip _____

Phone #: _____ Email: _____

Please indicate which of the following is true for the worker listed above: (Select all that apply)

| | |
|--|--------------------------|
| <input type="checkbox"/> Worker's income from your employment is below the income limit based on a calculation of what the worker's wage rate would translate to if annualized on a full-time basis* | Income limit \$XX,XXX |
| <input type="checkbox"/> Worker is employed by a Section 3 Business Concern (Select if your business qualifies as a Section 3 Business Concern) | |
| <input type="checkbox"/> Worker's residence is within the service area or neighborhood of the project | |

*Currently or at the time of hire if hired within the past 5 years.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct and certifies that the worker identified above meets the definition of a Section 3 worker. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802)

Signature

Date



A Compliance Guide to Section 504 Requirements

St. Tammany Parish Government
Department of Grants

Table of Contents

| | |
|--|-----------|
| 1. Overview of Section 504 | 1 |
| 2. Definitions | 1 |
| 3. Policies | 2 |
| 4. Compliance Procedures | 4 |
| A. Assurance of Compliance | 4 |
| B. Policy of Nondiscrimination | 5 |
| C. Effective Communication | 5 |
| D. Training your Staff | 5 |
| 5. Self-Evaluation and Transition Plan | 6 |
| A. What is a Self-Evaluation? | 6 |
| B. How do we conduct a Self-Evaluation? | 6 |
| C. What Is a Transition Plan? | 7 |
| D. How do we format a Transition Plan? | 7 |
| 3. Grievance Procedures | 8 |
| A. Filing | 8 |
| B. Review | 8 |
| C. Appeal Process | 9 |
| 4. Retention | 10 |
| 5. Public Notices | 10 |
| Appendix | 11 |
| Forms | |

1. Overview of Section 504

St. Tammany Parish is committed to educating subrecipients, of the requirements of Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990.

Under Section 504, state, local governments and other entities receiving federal funding are required to make their programs, activities and services accessible to individuals with disabilities. Title II of the ADA extends this requirement to all state and local governments, whether or not they receive federal funds.

Title II applies regardless of the public entity's size and seeks to ensure access to all publicly funded programs, services and agencies. Public entities that receive federal funding are subject to the requirements of both the ADA and Section 504.

Your organization must create a Section 504 Compliance Plan outlining your commitment to nondiscrimination and the policies and actions you will use to comply with the federal regulations. In your plan, be sure to include four sections: Compliance Policies and Procedures, Self-Evaluation and Transition Plan, Grievance Plan, and Public Notices.

St. Tammany Parish aims to assist our grant funding recipients to the fullest extent possible, in understanding and achieving compliance with Section 504. This manual was created for this purpose, but should not be considered legal advice in replacement of the federal regulations. Information in this manual can help you develop an ongoing accessibility program to make your services, activities, and programs accessible for qualified persons with disabilities. In this manual we will discuss the sections of your Compliance Plan and provide descriptions of the federal requirements as well as sample monitoring forms that you may use, either as-is or as templates to create your own, in order to ensure compliance.

In some areas we refer only to Section 504. That is because Section 504 is a specific requirement of the U.S. Department of Housing and Urban Development. However, these areas of the manual are also pertinent to the ADA and all public entities must comply with ADA Regulations. For further clarification on Section 504 and ADA compliance, consult the applicable federal regulations or contact the St. Tammany Parish Section 504 Compliance Officer.

2. Definitions

1. American with Disabilities Act (ADA): United States public law enacted in 1990 guaranteeing rights for people with disabilities. This law mandates reasonable accommodation and effective communication. This Act is intended to eradicate discrimination against certain protected groups, to "level the playing field" so that everyone has the same access and opportunity, unhindered by prejudice. This anti-discrimination law is a civil rights act, not an entitlement

program, and is outcome-neutral. Deficits must be judged relative to the average level of performance within the general population.

2. ADAAG: ADA Accessibility Guidelines. These regulations apply to new construction, as well as to any alterations of existing structures, and provide specific guidance in implementing the ADA.
3. Overall Program Accessibility: The ADA requires that programs as a whole be accessible to people with disabilities, and requires St. Tammany Parish to account how the program's elements work together as a whole and how services are delivered.
4. "Qualified individual with a disability": An individual with a disability who meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided to the public by St. Tammany Parish, with or without reasonable modifications to rules, policies, or practices, the removal of architectural or communication barriers, or the provision of auxiliary aids and services (Section 504 of the Rehabilitation Act of 1973, as amended, 42 U.S.C. Section 12131 et seq. , 28 CFR Part 35, the Americans with Disabilities Act of 1990, and RCW 49.60).
5. Self-Evaluation: The evaluation of policies, practices, and physical facilities to identify potential barriers to accessibility and corrective actions to reduce or eliminate those barriers.
6. UFAS: Uniform Federal Accessibility Standards. These regulations define environments which are safe, accessible and usable by people of all ages and abilities. Accessibility standards that all Federal agencies are required to meet; includes scoping and technical specifications.
7. Undue Burden: Significant difficulty or expense. In determining whether an action would result in an undue burden, factors to be considered include: the nature and cost of the action needed; if applicable, the overall financial resources of any parent corporation or entity can also be considered as well as the overall size of the parent corporation or entity with respect to the number of its employees; the number, type and location of its facilities; and, if applicable, the type of operation or operations of any parent corporation or entity, including the composition, structure and functions of the workforce of the parent corporation or entity.
8. Usability: Within facilities constructed prior to the passage of the ADA, some architectural elements may not meet current codes and requirements for accessibility. If a barrier to access by people with disabilities does not result, the facility is usable and complies with this policy. In other cases, though requirements of the applicable laws, codes, and regulations have been met, a barrier may exist to a qualified individual with a disability. In such cases, it may be necessary to modify the element in the facility to make the facility usable by qualified individuals with disabilities providing that such change and/or alteration does not result in an undue financial burden.

3. Policies

In accordance with Title II of the ADA and its implementing regulations, Section 504, WAC 51-40, and RCW 49.60 (collectively called the "disability non-discrimination laws"); no qualified individual with a disability shall, on the basis of such disability, be subjected to discrimination

or be excluded from participation in, or denied the benefits of the services, programs, activities or physical facilities which St. Tammany Parish provides to the public.

Under Section 504 of the Rehabilitation Act of 1973, you **MAY NOT**:

1. Deny a qualified individual with disabilities the opportunity to participate in, or benefit from, services.
2. Fail to afford a qualified individual with disabilities the opportunity for equal participation in services.
3. Fail to provide a qualified individual with disabilities the same opportunity to services as those afforded to others.
4. Provide different or separate services on the basis of disability, unless providing such separation is necessary to provide services that are as effective as those provided to persons without disabilities.
5. Enter in to any agreements with contractors, sub-contractors, or any entities that discriminates on the basis of disability in any aspect of a federally assisted activity.
6. Deny a qualified individual with disabilities the opportunity to participate as a member of planning or advisory boards.
7. Limit, in any other manner, a qualified individual with disabilities in the enjoyment of any right, privilege, advantage, or opportunity afforded to others.
8. Provide services to qualified individuals with disabilities in settings that are unnecessarily separate, segregated or restricted.

All Subrecipients **MUST**:

1. Comply with the provisions of the disability non-discrimination laws regarding access applicable to programs, activities, services, and physical facilities.
2. Certify assurance of compliance with St. Tammany Parish.
3. Appoint an ADA/Section 504 Compliance Officer.
4. Ensure physical facilities are usable by qualified individuals with disabilities. Where physical facilities cannot be made usable, overall program accessibility must be ensured.
5. Provide information on how to request alternate formats of written notices on all documents distributed to the public. At a minimum, information shall include the following: For alternate formats, contact (*appointed Compliance Officer's Name*) at (*address*), (*phone number*) or (*email address, if applicable*).
6. Develop a procedure that will provide an avenue for prompt and equitable resolution of grievances alleging discrimination on the basis of disability in the Parish's provision of programs, services, and activities, and access to physical facilities.
7. Ensure that all employees will receive information and training on all ADA and Section 504 regulations, as they are updated or at a minimum of once a year.

4. Compliance Procedures

The first section of your compliance plan will outline and describe your organizations policies and commitment of nondiscrimination. This has broken this section into five sub-sections described below:

A. Assurance of Compliance

All Subrecipients will be required to sign an “Assurance of Compliance” form at the beginning of every program year. St. Tammany Parish will keep this form on record in our office for up to five years, in order to maintain ADA and 504 compliance by the standards of the Department of Housing and Urban Development. Your compliance plan should include statements ensuring: your commitment to follow the Assurance of Compliance and you will sign every year you accept applicable grant funding from St. Tammany Parish.

The form will contain three sections that state:

- I. The project under this contract is subject to the requirements of Section 504 of the Rehabilitation Act of 1973, as amended, 42 U.S.C. Section 12131 et seq., 28 CFR Part 35, and the Americans with Disabilities Act of 1990, and RCW 49.60. All sub-recipients and organizations of federal funding awarded through St. Tammany Parish, are required to comply will all established rules as agreed upon and sited in the sub-recipient agreement.
- II. Compliance with the provision of Section 504 of the Rehabilitation Act of 1973, as amended, 42 U.S.C. Section 12131 et seq., 28 CFR Part 35, and all applicable rules and orders issued prior to the approval of the contract agreement with St. Tammany Parish shall be a condition of the Federal assistance provided to the project, binding upon signature. Failure to fulfill these requirements shall subject the sub-recipient, its contractors and subcontractors, its successors, and assigns to the sanctions specified in the contract agreement.
- III. St. Tammany Parish has included a Civil Rights Clause in the contract agreement and informed the sub-recipient of necessary compliance guidelines. St. Tammany Parish has made available a Section 504 compliance guide for sub recipients to refer to throughout the duration of the contract agreement.

B. Policy of Nondiscrimination

Your organization, as part of your 504 Compliance Plan, must outline your policy regarding nondiscrimination on the basis of disability. Your policy should state that your organization will make all programs, activities and services available to persons with disabilities, conduct a Self-Evaluation, address areas in your policy that are not in compliance with Section 504, create a Transition Plan, if necessary, and provide the name and contact information of your Compliance Officer. Please refer to the sample policy on the following page.

C. Effective Communication

Disabilities are not always in the form of physical limitations. Some individuals have communicative disabilities, meaning the person is deaf or blind. In order to accommodate all persons with disabilities, it is important for your organization to establish provisions of effective communication.

Your organization should be able to provide written materials in alternative formats, such as large print or on audio tapes. This section of your compliance plan will describe the types of accommodations you will be able to make as well as a process for requesting alternative formats. You do not have to keep these formats in your office; however, if a person should request an alternate format you will need to be able to provide material in the most accommodating format and in a timely manner. In order to research methods and produce the best outcome, St. Tammany Parish recommends you take seven to ten business days to accommodate these requests. We also recommend that you keep an updated list of auxiliary resources in your office provide that list to an employee who may come in contact with the public.

If for some reason an individual's request cannot be granted, your organization must make every effort to refer the individual to an agency or similar program where they can receive the same or similar services. Your agency must inform the individual immediately as to why his/her request cannot be granted and inform him or her of alternative organizations or programs. The decision not to provide services must be made by your Director or his/her designee.

D. Training your staff

Staff education and training should be included in your "Compliance Policies and Procedures". It is important for every member of your staff to be familiar with your 504 policies and procedures, even if some employees do not have direct contact with the public. Your employees should know that information or memorandums can be read to a person with disabilities upon request and how to contact auxiliary agencies for more efficient ways of communication if necessary. Your employees should also know where to locate a grievance complaint for and how to file a complaint if a member of the public wishes to do so.

In this section, outline the training process you will use to ensure that your staff and employees have adequate knowledge on Section 504. St. Tammany suggests that your appointed Compliance Officer put together a basic outline of your ADA/504 policies and create a training certification form. Compliance Officer may also call a staff meeting where the compliance officer can discuss the outline and have each

employee sign that he or she received the information. Keep these signed forms on file for no longer than five years after the end of your commitment with St. Tammany Parish. Should your agency receive continual funding, recertify your employees each year, updating your policies as necessary.

5. Self -Evaluation and Transition Plan

The second section of your compliance plan will describe and outline your self-evaluation plan and transition plan. You should state how often a self-evaluation will be conducted, who will complete the evaluation and the plans to correct any negative findings.

A. What is a Self-Evaluation?

A self-evaluation is a tool used to assure compliance with all federal rules and regulation. The self- evaluation is a comprehensive review that will evaluate your project's policies and procedures in order to determine whether they conform to the requirements of Section 504 and the regulations at 24 CFR Part 8. Your self-evaluation should help you identify any services, policies, or practices that discriminate against or exclude people with disabilities. This guide provides only an example of how a self-evaluation can be performed.

B. How do we conduct a Self-Evaluation?

Subrecipients are free to use this guide and the sample forms or other approaches for performing the self-evaluation. The self-evaluation should be completed by your Compliance Officer and upon completion discussed and approved by the head of your organization or his or her designee. Be sure to include a description of the areas examined and any problems identified. Your self-evaluation should also note any necessary changes to policies, procedures, services or any physical limitations.

- Start by compiling a list of your entity's programs, activities and services that are funded by the St. Tammany Parish through the Community Development Block Grant or other HUD grant.
- Gather all materials available that may describe or govern how your programs, services and activities are administered.
- Review and complete your self-evaluation using the form provided by St. Tammany Parish or one that you have created and tailored to fit your organization's needs.

Be sure to look at administrative policies and procedures and not simply the physical structure(s) used to serve your clients. It is important to consider your policies because they may be discriminatory in ways that are less obvious than the physical limitations of your building.

Your self-evaluation should be completed and submitted to St. Tammany Parish

as soon as possible. At the very latest, you must submit your self-evaluation prior to your request for the final drawdown of funds. If you continually make agreements with St. Tammany Parish over a period greater than one year, you are only required to perform a self-evaluation once every five years. St. Tammany Parish does have the right to request a copy of your self-evaluation before entering into a formal agreement with your organization. You can use the Self-Evaluation Questionnaire to evaluate your policies and the Self-Evaluation Checklist to evaluate your facilities. The results will then be transferred to a Summary of Actions and Transition Plan.

C. What is a Transition Plan?

A Transition Plan is the outline of the steps, time and costs projected of making necessary changes in your programs, procedures or physical structure in order to accommodate persons with disabilities.

A Transition Plan follows the walk-through of all of your facilities in which you offer programs, services and activities to which the public needs direct access. This walk-through is part of the Self-Evaluation that looks at your facilities for compliance with the federal regulations, specifically the UFAS and the ADAAG.

D. How do we format a Transition Plan?

The best way to format your Transition Plan, should you need to create one, is to create two separate documents. The first will list all necessary changes to your programs, procedures or facilities. The changes should be organized and separated into three categories: Physical Alterations, Accessibility Policies, and Communications. The second document, attached to the end of the first, should be a detailed outline of each needed physical alteration. The outline should include the name and address of the facility, the name and title of the person completing the outline, the necessary structural changes, the applicable UFAS and ADDAG standard, as well as a timeline for completion and projected costs. A sample of these forms can be found at the end of this section.

If you determine that providing program access in certain areas would result in a financial or administrative burden on your organization you may claim "Undue Burden". Before the claim is made the agency should consult St. Tammany Parish and/or the U.S. Department of Justice to determine the claim is justified.

Remember that not all physical limitations have to be corrected by making structural changes. If you are not able to make a structural change or your organization can not afford to, simply changing your program policies can help you to avoid the time and costs associated with the transition. For example, if your utility service counter is more than 36" above the finished floor, you can choose to adopt a policy that, upon request, a representative from your organization will make a home visit to intake an application for a qualified person with a disability.

**If your facility is a registered historical building or landmark, differs from the standard UFAS and ADAAG requirements.

3. Grievance Procedures

Your grievance procedure is the third section of the compliance plan. The process should be designed to effectively and efficiently receive, review and resolve complaints made by the public. It may be used to file a complaint alleging:

- Limiting policies or procedures;
- Discrimination under Section 504 of the Rehabilitation Act; or
- Structural and parking accessibility issues where services are rendered.

There are several ways to intake complaints; the most simple is to create a standard grievance complaint form. With a standard form you are able to ensure that the needed information is provided by the complainant and you have a uniform system for all complaints. A sample grievance form is located in the appendix.

Once you have written and adapted a policy that best fits the needs of your organization, you should make it accessible to any member of the public that should ask for it. Your policy should include the following:

A. Filing

Complaints should be filed within a reasonable period of time after the alleged violation. Your organization can define what this timeframe is, but keep in mind that it will be hard to investigate a complaint when the incident or violation was two months prior.

A complaint should be in writing, contain the name, address, phone number of the person filing it and location, date and brief description of the action alleged to be discriminatory. It is up to your organization to decide if alternative formats will be accepted, such as email or an interview.

B. Review

Again, it is up to you to determine the timeframe in which complaints should be handled. St. Tammany Parish recommends that within fifteen (15) calendar days after receiving the complaint, your Compliance Officer should meet or contact the complainant to discuss the alleged violation and any possible resolutions. After contacting the complainant, your Compliance Officer should conduct an investigation of the complaint if necessary to determine validity. We recommend this

“investigation step” so that the complainant, or person or persons acting on his/her behalf, have the opportunity to submit evidence relevant to the complaint.

Your Compliance Officer should then issue a written decision determining validity of the complaint no later than thirty (30) days after its filing. The response will offer resolutions of the complaint. The Compliance Officer should inform the appropriate authorities within your organization of the complaint, the investigation and the decision made.

C. Appeal Process

You may establish an internal appeals process for unsatisfied. If you choose not to establish an in-house appeal process, you may forward appeals to St. Tammany Parish, investigate and rule on the appeal within the same timeframe outlined above. You must include St. Tammany Parish and HUD contact information in your grievance procedures. Complaints may be forwarded to either entity if you do not feel you are unable to make a non-bias resolution.

Complaint Forwarding:

St. Tammany Parish
Compliance Officer
St. Tammany Parish Government Grants Department
P.O. Box 628 Covington, LA 70434
Tel: (985) 867-5095 Fax: (985) 898-5205

Regional HUD Office
Hale Boggs Federal Building
500 Poydras Street, 9th Floor
New Orleans, LA 70130

National HUD Office
Office of Fair Housing and Equal Opportunity Department of Housing and Urban Development
451 7th Street S.W., Washington, DC 20410

4. Retention

Files must be kept for a minimum of five years after the completion of your agreement with St. Tammany Parish. This is because HUD may choose to monitor St. Tammany Parish at any time and we may need access to your compliance records to show our commitment to Section 504 compliance.

5. Public Notice

When you have established a nondiscrimination policy, including an assurance of compliance, an outline of your commitment for nondiscrimination, procedure for effective communication and a grievance process, you must publish a public notice announcing your commitment to compliance. In the final section of your compliance plan, state what must be included in a public notice.

Your public notice must include a statement regarding your policy of nondiscrimination, a statement regarding your commitment to provide effective communication and information on how to locate your grievance form and contact your compliance officer.

Employee Training Certification

I, _____, do hereby certify that I have

received information and training regarding Section 504 of the Rehabilitation Act of 1973. Below is the list of training material and information I received from (insert the name of your organization here). I also certify that I am aware of the companies policy of nondiscrimination on the basis of disability, understand the grievance procedure and know which of my co-workers has been appoint the Compliance Officer.

| | |
|--|---|
| | Section 504/ADA Information Brochure |
| | List of available auxiliary services |
| | Information regarding St. Tammany Parish policies and Compliance Manual |

| |
|--------------------|
| |
| Employee Signature |

| |
|------|
| |
| Date |

| |
|-----------------------------|
| |
| Compliance Office Signature |

| |
|------|
| |
| Date |

Auxiliary Aids and Services

Use the following resources, as well as any others, to find the best accommodation for a person with disabilities.

| Governor's Office of Disability Affairs | Louisiana Assistive Technology Access Network (LATAN) |
|---|--|
| Promotes the rights and opportunities for persons with disabilities in the State of Louisiana. | Services Louisiana citizens of all ages with all types of disabilities and limitations due to aging who need assistive technology and daily living aids. |
| Mailing Address: P.O. Box 94004 Baton Rouge, LA 70804 Phone: (225) 219-7550 Fax: (225) 219-7551 Disability.Affairs@la.gov | Address: 10988 N. Harrell's Ferry Rd., Ste. 5 Baton Rouge, LA 7081 Phone: (225) 925-9500 or 800-270-6185 |
| United States Department of Justice (DOJ) | Job Accommodations Network (JAN) |
| Provides free technical assistance and informational materials to people with disabilities, businesses, state and local government agencies, and the general public on rights and responsibilities under Title II and III of the ADA. | An international toll-free consulting service that provides information regarding the ADA, job accommodations and the employability of people with disabilities. |
| Phone: 800-514-0301 V/TTY Website: www.usdoj.gov/crt/ada | Phone: 800-526-7234 or 800-781-9403 (TTY) Website: http://www.askjan.org |



Summary of Actions Taken to Achieve Section 504 Compliance

(Name of Organization) conducted a self-evaluation on (Date or Month and Year) administered by (Compliance Officer) as part of its efforts for compliance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990. The self-evaluation was based on the criteria for compliance by both Section 504 and the ADA using the Americans with Disabilities Act Accessibility Guidelines (AADAG) and the Uniform Federal Accessibility Standards (UFAS).

(Name of Organization) reviewed its facilities, areas programs and procedures in which services, programs and activities operate. The following facilities were evaluated: (list names of buildings)

Physical Alterations

| Area | Deficiency | Correction | Completed |
|-------------|--|---|-----------|
| Main Office | Accessible entrance not designated | Install signage indicating accessible entrance location | May 2023 |
| Main Office | Inaccessible restroom | Altered restroom stall to 60" wide & 59" deep | June 2023 |
| Main Office | Threshold change greater than ½" at front entrance | Threshold change altered to ½" and beveled the slope | June 2023 |

Accessibility Policies

| Area | Deficiency | Correction | Completed |
|-------------|---|--|-----------|
| Main Office | Service counter is more than 36" above the finished floor | Policy changed to provide home visits to intake applications | May 2023 |
| Annex #1 | No accessible restrooms, some Times host public meetings | Adopt policy to relocate any public meetings | May 2023 |

Communications

| Area | Deficiency | Correction | Completed |
|-------------|--|--|-----------|
| Main Office | Interactions between hearing/visually impaired clients & staff | Adopt policy to have staff write notes or read aloud as needed | June 2023 |

Section 504 Transition Plan

Date

Name of Person Completing Transition Plan

Title

Name and Address of Facility

Necessary Changes

Applicable UFAS and ADAAG standard

Type of action taken (If no action note if it is because of undue burden)

Person responsible for overseeing action

Project Date to Initiate Action

Project Date to Complete Action

Projected Cost to Complete Action

GRIEVANCE FORM

Complainant's Information

Name: _____

Phone: _____

Mailing Address: _____

Grievance Information

Date: _____

Location: _____

Description of events:

Signature

Date

OFFICE USE ONLY

Date Received: _____

Received By: _____

Complainant Contacted: _____

Public Notice Example

NOTICE OF NON-DISCRIMINATION

As required by Section 504 of the Rehabilitation Act (as amended) and the Americans with Disabilities Act (ADA), St. Tammany Parish has adopted by resolution a policy regarding non-discrimination on the basis of disability.

St. Tammany Parish does not discriminate on the basis of disability on the admission to, access to, or operations of CDBG programs, services or activities. Further, St. Tammany Parish will not enter into agreements or contracts with entities that discriminate against qualified individuals with disabilities.

Qualified individuals who need accessible communication aids and/or services or other accommodations to participate in programs and activities are invited to make your needs and preferences known to the Compliance Officer. Please give us at least three to five days advanced notice so we can adequately meet your needs.

An internal grievance procedure and complaint form is available on the department's website to resolve complaints. Questions, concerns, or requests for additional information regarding 504/ADA should be forwarded to:

Grants Department
St. Tammany Parish Government
P.O. Box 628, Covington, LA 70434
Ph: (985) 867-5095 Fax: 985-898-5205
www.stpgov.org

Upon request, this notice and other materials may be made available in alternative formats from the Compliance Officer.

Compliance Officer

| | |
|------------------|--|
| Name | |
| Title | |
| Organization | |
| Street Address | |
| Mailing Address | |
| Telephone Number | |
| Email Address | |

I, _____, do hereby agree to take on the roll of Section 504 Compliance Officer for _____ and all the duties required of the position.

| | |
|-----------|------|
| | |
| Signature | Date |

This person is responsible for the Self-Evaluation

This person is responsible for the Transition Plan

This person is not responsible for the Self-Evaluation

This person is not responsible for the Transition Plan

If different person is responsible for the Self-Evaluation and Transition Plan, please provide the above information for those employees.



Section 504 Self-Evaluation Questionnaire

The following questionnaire is designed to assist you in the creation of you Section 504/ADA Policy.

Program Policy & Procedure

| | Yes | No | N/A |
|---|--------------------------|--------------------------|--------------------------|
| 1. Does your entity have a written policy stating that it does not discriminate against people with disabilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Does your staff know and understand your commitment not to discriminate? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Do you have a designated coordinator for the Section 504 Rehabilitation and the Americans with Disabilities Act (ADA) compliance requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Do you have procedures to assure that all programs, services, and activities, including meetings, hearings, workshops, and conferences, are held in accessible locations? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Do you have separate or special programs for individuals with disabilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. If yes to # 5, do you have written procedures to ensure that these individuals may also participate in programs available to the public? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. Do you have any policies and procedures, program eligibility and admission requirements, or licensing standards that: | | | |
| a. Deny a qualified individual with a disability the opportunity to participate in or benefit from aid or services? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Do you afford an opportunity for participation or benefit equal to that afforded others? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Do you provide a qualified individual with a disability with aid or service that is as effective in affording equal opportunity to obtain the same result, gain the same benefit, or reach the same level of achievement as that provided to others? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Do you provide aids or services to individuals with disabilities as effective as those provided to others? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Do you assure that assistance or contract is not provided to a person or entity that discriminates based on disability? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f. Do you deny a qualified individual with a disability the opportunity to participate as a member of planning or advisory boards? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g. Limit the enjoyment of a qualified individual with a disability any right, privilege, advantage or opportunity enjoyed by other qualified individuals who receive your services? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. Do you have provisions to assure that contractors or subcontractors understand 504/ADA requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |



Effective Communication

| | Yes | No | N/A |
|---|--------------------------|--------------------------|--------------------------|
| 1. Do you have a policy or procedure to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Do you provide any written materials for your programs or services? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. If yes to #2, which of the following alternatives to the written materials do you provide: | | | |
| a. Audio Tape | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Braille | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Mailed to Home | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Large Print | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Interpreter/Aid | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f. Other Assistance | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Do you describe the auxiliary and services that will be provided to individuals with a disability? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Do you describe how an individual with a disability may request assistance and express their preference for auxiliary aids and services? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Do you describe how your entity regularly advertises to the public that you will provide auxiliary aids and services for effective communication to participate in your programs and services? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. Do you describe how your entity will ensure that meetings, hearings and conferences will be accessible for individuals with communication disabilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. If you allow the public to use your telephone, is there at least one designated phone that is hearing-aid compatible? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. If your entity determines that equally effective communication cannot be provided, do you have the following: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| a. A statement included in your self-evaluation from the head of your agency or designee? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Reasons why the service, program or activity would be fundamentally altered or would result in undue financial and administrative burdens? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |



Notice of Nondiscrimination

| | Yes | No | N/A |
|---|--------------------------|--------------------------|--------------------------|
| 1. Does your self-evaluation include a copy of your Notice of Nondiscrimination? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Does your notice include the following information: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| a. A statement that your entity does not discriminate under Section 504 or the ADA? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Your 504/ADA Compliance Officer's name, address and telephone number? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. A statement notifying individuals about the availability of alternative formats? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. A statement that your entity has a grievance procedure available to resolve complaints? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Do your written materials contain a notice that your entity cannot accommodate a person with a disability? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Does your grievance procedure include a time limited to file a complaint? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Does your grievance procedure inform individuals of their right to file a complaint with St. Tammany Parish Department of Health and Human Services including the parishes' address? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

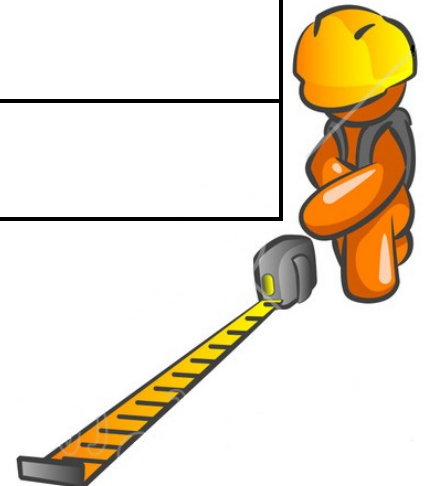
Grievance Procedure

| | Yes | No | N/A |
|---|--------------------------|--------------------------|--------------------------|
| 1. Have you established and adopted a procedure to intake complaints of discrimination? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Does your complaint format require all complaints to be written and include the complainant's name, address and telephone number and the date and location of the alleged violation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Have you notified the public of your adapted grievance procedure and included information on where to file a claim? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Have you established timely review periods? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Do you have an established appeal process? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Do you include information regarding filing a complaint with the Department of Health and Human Services? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |



ADA & Section 504 Self-Evaluation Checklist

| | | | |
|----------------|--|--------------------|--|
| Facility Name | | | |
| Street Address | | City & Zip Code | |
| Reviewed By | | Date | |



Accessible Route

| Characteristic & UFAS Reference | Characteristic & ADAAG Reference | UFAS Requirement | ADAAG Requirement | Actual Measurement of Finding | Necessary Changes |
|---|---|--|---------------------------|-------------------------------|-------------------|
| Number Reference: 4.1.2, 4.3.2 | Number Reference: 4.1.2, 4.3.2 | Minimum: 1 route shall connect parts of facility | Same as UFAS Requirements | | |
| Width Reference: 4.3.3 | Width Reference: 4.3.3 | Minimum: 36" clear Except at doors | Same as UFAS Requirements | | |
| Passing Space: Reference: 4.3.4 | Passing Space Reference: 4.3.4 | If route is less than 60" x 60", passing space minimum of every 200' | Same as UFAS Requirements | | |
| Head Room Reference: 4.3.3 | Head Room Reference: 4.3.5 | Minimum: 80" clear | Same as UFAS Requirements | | |
| Surface Texture Reference: 4.3.6, 4.5 | Surface Texture Reference: 4.3.6, 4.5 | Non-Slip Firm Stable | Same as UFAS Requirements | | |
| Slope Reference: 4.3.7 | Slope Reference: 4.3.7 | Not to exceed 1:20. If greater, apply criteria for ramp & curb ramp | Same as UFAS Requirements | | |
| Change in Level Reference: 4.3.8 | Change in Level Reference: 4.3.8 | If greater than .5": curb ramp, ramp, elevator, or platform lift applies | Same as UFAS Requirements | | |
| Gratings Reference: 4.5.4, Fig. 8(h) | Gratings Reference: 4.54.4, Fig 8(h) | Maximum: .5" wide in direction of route, except at doors | Same as UFAS Requirements | | |

Parking

| Characteristic & UFAS Reference | Characteristic & ADAAG Reference | UFAS Requirement | ADAAG Requirement | Actual Measurement of Finding | Necessary Changes |
|--|--|--|---------------------------|-------------------------------|-------------------|
| Number Reference: 4.1.1(5) | Number Reference: 4.1.2(5) | At least 1 if any visitor parking provided. More depending on number of spaces | Same as UFAS Requirements | | |
| Location Reference: 4.6.2 | Location Reference: 4.6.2 | Closest to accessible entrance; on accessible route | Same as UFAS Requirements | | |
| Width of Space Reference: 4.6.3 | Width of Space Reference: 4.6.3 | Minimum: 96" wide | Same as UFAS Requirements | | |
| Width of Space & Access Aisle Reference: 4.6.3 | Width of Space & Access Aisle Reference: 4.6.3 | Minimum: 60" wide Aisle must be adjacent to space | Same as UFAS Requirements | | |
| Slope of Space & Access Aisle Reference: 4.6.3 | Slope of Space & Access Aisle Reference: 4.6.3 | Maximum: 1:50 | Same as UFAS Requirements | | |
| Signage on Space Reference: 4.6.4 | Signage on Space Reference: 4.6.4 | Sign on space showing symbol of access | Same as UFAS Requirements | | |

Curb Ramps

| Characteristic & UFAS Reference | Characteristic & ADAAG Reference | UFAS Requirement | ADAAG Requirement | Actual Measurement of Finding | Necessary Changes |
|--|--|--|---------------------------|-------------------------------|-------------------|
| Number & Location Reference: 4.7.1 | Number & Location Reference: 4.7.1 | Whenever an accessible route crosses a curb | Same as UFAS Requirements | | |
| Slope Reference: 4.7.2 | Slope Reference: 4.7.2 | Maximum: 1:12 | Same as UFAS Requirements | | |
| Width Reference: 4.7.3 | Width Reference: 4.7.3 | Minimum: 36" | Same as UFAS Requirements | | |
| Surface Reference: 4.7.4 | Surface Reference: 4.7.4 | Firm Stable Non-Slip | Same as UFAS Requirements | | |
| Side Design Reference: 4.7.5 | Side Design Reference: 4.7.5 | If where pedestrians walk or if no handrails or guard rails, then must have flared sides & maximum slope of flare 1:10 | Same as UFAS Requirements | | |

Ramps

| Characteristic & UFAS Reference | Characteristic & ADAAG Reference | UFAS Requirement | ADAAG Requirement | Actual Measurement of Finding | Necessary Changes |
|--|--|---|---------------------------|-------------------------------|-------------------|
| Number & Location Reference: 4.8.1, 4.3.7 | Number & Location Reference: 4.8.1, 4.3.7 | Any part of an accessible route with a slope greater than 1:20 | Same as UFAS Requirements | | |
| Slope Reference: 4.8.2 | Slope Reference: 4.7.2 | Maximum: 1:12 Use least possible (Regulation does not apply to curb ramps) | Same as UFAS Requirements | | |
| Cross Slope Reference: 4.8.6 | Cross Slope Reference: 4.8.6 | Maximum: 1:50 | Same as UFAS Requirements | | |
| Surface Reference: 4.8.6, 4.5.1 | Surface Reference: 4.8.6, 4.8.1 | Slip Resistant Firm Stable | Same as UFAS Requirements | | |
| Handrails Reference: 4.8.6 | Handrails Reference: 4.8.5 | 30" - 34" high & 1" beyond top & bottom (if ramp rise is >6 & run is >72") | Same as UFAS Requirements | | |
| Edge Protection Reference: 4.8.7 | Edge Protection Reference: 4.8.7 | Must have walls, railing, projecting surfaces or curb at least 2" high | Same as UFAS Requirements | | |
| Landings Reference: 4.8.4 | Landings Reference: 4.8.4 | Must be as wide as ramp & minimum of 60" long at top & bottom | Same as UFAS Requirements | | |
| Gratings Reference: 4.5.4, Fig 8(h) | Gratings Reference: 4.5.4, Fig 8(h) | Minimum: 36" | Same as UFAS Requirements | | |

Entrance & Interior Doors

| Characteristic & UFAS Reference | Characteristic & ADAAG Reference | UFAS Requirement | ADAAG Requirement | Actual Measurement of Finding | Necessary Changes |
|--|--|--|---|-------------------------------|-------------------|
| Number Reference: 4.1.2(8) | Number Reference: 4.1.2(8) | At least 1 principle entrance must be accessible | At least 50% of all public entrances must be accessible | | |
| Location Reference: 4.38.2 | Location Reference: 4.3.2 | On an accessible route | Same as UFAS Requirements | | |
| Type Reference: 4.13.2 | Type Reference: 4.13.2 | Standard single or double-leaf hinged door (not revolving, etc) | Same as UFAS Requirements | | |
| Width Reference: 4.13.5, Fig 24 | Width Reference: 4.13.5, Fig 24 | Minimum: 32" clear opening (check regulations for double-leaf doors) | Same as UFAS Requirements | | |
| Hardware Reference: 4.13.9 | Hardware Reference: 4.13.9 | Maximum: 48" high Push/pull type or level operated) | Same as UFAS Requirements | | |
| Opening Force Reference: 4.13.11 | Opening Force Reference: 4.13.11 | Maximum: Ext. hinged: 8.5lbf Int. hinged: 5lbf (force applies for hinged, sliding or folding) | Same as UFAS Requirements | | |
| Threshold at Doorway Reference: 4.13.8 | Threshold at Doorway Reference: 4.13.8, Fig 25 | Maximum: 5" high with leveled edge; 1:2 slope | Same as UFAS Requirements | | |
| Floor at Doorway Reference: 4.13.6, Fig 25 | Floor at Doorway Reference: 4.13.6, Fig 25 | Differs depending on door, see regulations for details | Same as UFAS Requirements | | |

Elevators

| Characteristic & UFAS Reference | Characteristic & ADAAG Reference | UFAS Requirements | ADAAG Requirements | Actual Measurements of Findings | Necessary Changes |
|---|---|---|---|---------------------------------|-------------------|
| Number Reference: 4.1.2 | Not required unless building is a shopping mall/ center or health care office | At least 1 serving each level on an accessible route if levels are not connected by ramps | Not required if building is < 3 stories & if each floor is < 3000 sq. ft. | | |
| Location Reference: 4.3.8, 4.10.1 | Location Reference: 4.3.8, 4.10.1 | On accessible route | Same as UFAS Requirements May not be Required | | |
| Type Reference: 4.10.2 | Type Reference: 4.10.2 | Passenger automatic self-leveling with reopening devices | Same as UFAS Requirements May not be Required | | |
| Elevator Cars Reference: 4.10.9, Fig 22 | Elevator Cars Reference: 4.10.9, Fig 22 | Minimum: Side opening: 51" x 68" Front opening: 51" x 80" | Same as UFAS Requirements May not be Required | | |
| Hall Call Button Reference: 4.10.3 | Hall Call Button Reference: 4.10.3 | Centered 42" or less from floor, lighted | Same as UFAS Requirements May not be Required | | |
| Car Controls Reference: 4.10.12 | Car Controls Reference: 4.10.12 | Control height 48" max, button at least 3/4" and marked with raised characters | Same as UFAS Requirements May not be Required | | |
| Elevator Doors Reference: 4.10.8 | Elevator Doors Reference: 4.10.8 | Door remains open 3 seconds | Same as UFAS Requirements May not be Required | | |

Lifts

| Characteristic & UFAS Reference | Characteristic & ADAAG Reference | UFAS Requirements | ADAAG Requirements | Actual Measurement of Findings | Necessary Changes |
|---|---|---|---------------------------|--------------------------------|-------------------|
| Number Reference: 4.1.2(5), 4.11.1 | Number Reference: 4.1.3 | May be used in lieu of elevator | Exception 4 | | |
| Clear Floor Space Reference: 4.2.4 | Clear Floor Space Reference: 4.2.4 | Maximum: 30" x 48" | Same as UFAS Requirements | | |
| Type Reference: 4.10.2 | Type Reference: 4.10.2 | Passenger automatic self-leveling with reopening devices | | | |
| Elevator Cars Reference: 4.10.9, Fig 22 | Elevator Cars Reference: 4.10.9, Fig 22 | Minimum: Side Opening: 51" x 68" Front Opening: 51" x 80" | Same as UFAS Requirements | | |

Drinking Fountains

| Characteristic & UFAS Reference | Characteristic & ADAAG Reference | UFAS Requirement | ADAAG Requirement | Actual Measurement of Finding | Necessary Changes |
|---|---|---|---|-------------------------------|-------------------|
| Number Reference: 4.1.2(9) | Number Reference: 4.1.3(10) | 50% on each floor. If only 1 is available it must be accessible. | 50% on each floor. If only 1 is available it must be accessible to wheelchairs & individuals with difficulties bending or stooping. | | |
| Location Reference: 4.3.2(2) | Location Reference: 4.3.2(2) | On accessible route | Same as UFAS Requirements | | |
| Height Reference: 4.15.2, Fig 27 | Height Reference: 4.15.2, Fig 27 | Spout mounted 36" above the floor | Same as UFAS Requirements | | |
| Controls Reference: 4.15.4, 4.27.4 | Controls Reference: 4.15.4, 4.27.4 | Operable with one hand without grasping or twisting | Same as UFAS Requirements | | |
| Clearance Reference: 4.15.5, Fig 27 | Clearance Reference: 4.15.5, Fig 27 | Minimum: Wall mounted: 27" bottom of apron to floor Built in: 30" x 48" front of fountain | Same as UFAS Requirements | | |

Restrooms

| Characteristic & UFAS Reference | Characteristic & ADAAG Reference | UFAS Requirement | ADAAG Requirement | Actual Measurement of Finding | Necessary Changes |
|---|---|---|---------------------------|-------------------------------|-------------------|
| Number Reference: 4.1.2(10) | Number Reference: 4.1.2(10) | If toilet facilities are provided to public, each shall be accessible | Same as UFAS Requirements | | |
| Location Reference: 4.3.2(2) | Location Reference: 4.3.2(2) | On an accessible route | Same as UFAS Requirements | | |
| Entrance Door Reference: 4.13.5, Fig 25 & 26, 4.13.9 | Entrance Door Reference: 4.13.5, Fig 25 & 26, 4.13.9 | Minimum: 32" clear opening Lever handle or push/pull type hardware | Same as UFAS Requirements | | |
| Door Closer Reference: 4.13.11(2)(b) & (c) | Door Closer Reference: 4.13.11(2)(b) & (c) | Maximum: 5lbf effort | Same as UFAS Requirements | | |
| Unobstructed Space Reference: 4.16.2, Fig 30 | Unobstructed Space Reference: 4.16.2, Fig 28 | Clear space to allow for wheelchair traffic | Same as UFAS Requirements | | |
| Toilet Stalls Reference: 4.17.3, Fig 30 | Toilet Stalls Reference: 4.17.3, Fig 30 | Door Minimum: 32" or 36" wide (Width can vary due to location, depth can vary depending on configuration) | Same as UFAS Requirements | | |
| Grab Bars Reference: 4.17.6 fig 29 & 30, 4.26.2 | Grab Bars Reference: 4.17.6, Fig 29 & 30, 4.26.2 | 42" minimum length; 12" max. from wall, 54" min. from back wall; 33-36" from floor, 1.25-1.5" diameter | Same as UFAS Requirements | | |
| Water Closet Seat Height Reference: 4.16.3, Fig 29 | Water Closet Seat Height Reference: 4.16.3, Fig 29 | Height: 17-19", measured to top of toilet seat (No spring to return to lift position) | Same as UFAS Requirements | | |

Public Telephones

| Characteristic & UFAS Reference | Characteristic & ADAAG Reference | UFAS Requirement | ADAAG Requirement | Actual Measurement of Finding | Necessary Changes |
|--|--|--|---------------------------|-------------------------------|-------------------|
| Number Reference: 4.1.2(16) | Number Reference: 4.1.2(17) | At least 1 per floor if telephones are installed | Same as UFAS Requirements | | |
| Location Reference: 4.31.2 | Location Reference: 4.3.2 | On an accessible route with clear floor space 30" x 48" | Same as UFAS Requirements | | |
| Height Reference: 4.31.3, 4.2.5 | Height Reference: 4.31.3, 4.2.5 | Highest operable control 48" for front approach 54" for parallel approach | Same as UFAS Requirements | | |
| Controls Reference: 4.31.6 | Controls Reference: 4.31.6 | Push button | Same as UFAS Requirements | | |
| Equipment of Hearing Impaired Reference: 4.31.5, 4.1.2(16) | Equipment of Hearing Impaired Reference: 4.31.5, 4.1.2(16) | At least one shall generate magnetic field; at least one shall have a volume control | Same as UFAS Requirements | | |

Warning Signals

| Characteristic & UFAS Reference | Characteristic & ADAAG Reference | UFAS Requirements | ADAAG Requirements | Actual Measurements of Findings | Necessary Changes |
|---------------------------------------|---------------------------------------|--|---------------------------|---------------------------------|-------------------|
| Number Reference: 4.1.2(13) | Number Reference: 4.1.3(14) | If a warning system are provided both visual and audible should be provided | Same as UFAS Requirements | | |
| Audible Reference: 4.28.2 | Audible Reference: 4.28.2 | Minimum: 15 decibels above prevailing sound level Maximum: 120 decibels above prevailing sound level. | Same as UFAS Requirements | | |
| Visual Reference: 4.28.3 | Visual Reference: 4.28.3 | Minimum: 15 decibels above prevailing sound level Maximum: 120 decibels above prevailing sound level | Same as UFAS Requirements | | |

Meeting and Conference Areas

| Characteristics & UFAS Reference | Characteristics & ADAAG Reference | UFAS Requirements | ADAAG Requirements | Actual Measurements of Findings | Necessary Changes |
|--|--|--|--|---------------------------------|-------------------|
| Number Reference: 4.1.2(18) | Number Reference: 4.1.3(19) | All places of assembly shall be accessible | Same as UFAS Requirements | | |
| Number of Wheelchair Accessible Locations Reference: 4.1.2(18) | Number of Wheelchair Accessible Locations Reference: 4.1.2(19) | At least 3 or more depending in overall number of seats beginning with 50 seats | At least 1 or more depending on overall number of seats beginning with 4 seats | | |
| Placement of Wheelchair Accessible Locations Reference: 4.33.3 | Placement of Wheelchair Accessible Locations Reference: 4.33.3 | Adjacent to accessible route | Adjacent to accessible route companion seating, seating capacity exceeding 300 | | |
| Size of Locations Reference: 4.33.3, Fig 46 | Size of Locations Reference: 4.33.2, Fig 46 | Minimum: Forward access location: 48" long to 33" wide Side access location: 60" long x 33" wide | Same as UFAS Requirements | | |