



ADA SELF-EVALUATION and TRANSITION PLAN

FY 2025

ADA SELF-EVALUATION CHECKLIST

PERSON COMPLETING THIS FORM:

Melinda McCullough, Chief Operations Officer – Quality Management Department (325-658-7750, ext. 539)

PROGRAM, ACTIVITY OR SERVICE: MHMR Concho Valley (MHMRCV)

A. LIST OF PEOPLE CONSULTED

1. Planning:

- Chief Executive Officer – Gregory J. Rowe
- Chief Human Resources Officer – Monica Tello
- Chief of Behavioral Health Services – Eddie Wallace
- Chief of IDD Services – Gana Brazeal-Huff
- Chief Administrative Officer/Risk Management/Safety Officer – Annette Hernandez

2. Site Inspection:

- Maintenance Department – David Cook
- Service Site Supervisors

3. Plan Review

- Planning and Network Advisory Committee (PNAC)
- Risk Management Committee
- Quality Assurance Committee

B. DOCUMENT PREPARATION

- Melinda McCullough, Chief Operations Officer

C. IMPLEMENTATION

- MHMRCV staff;
- MHMRCV volunteers;
- MHMRCV interns; and
- MHMRCV contractors.

D. PARTICIPATION OF PERSONS WITH DISABILITIES

1. *List steps taken to ensure that people with disabilities (or their representatives) participate in the completion of this self-evaluation.*

- All people receiving services at MHMRCV have a disability as defined by A.D.A.
- MHMRCV utilizes four methods of obtaining customer satisfaction information related to services and accessibility.
 - The individuals served are all provided a “Consumer Rights” handbook at admission and are informed of the accessibility of the Client Rights Officer. The Client Rights Officer is notified of any complaints regarding accessibility.

- There are suggestion boxes located in public spaces at all MHMRCV locations with feedback cards available for respondents to complete.
- Patient Satisfaction Surveys are offered to individuals to complete at MHMRCV clinics/programs.
- This plan is submitted for review and feedback to the Planning and Network Advisory Committee (PNAC), which is a group comprised of stakeholders including consumers, family members, and community members.

E. NATURE OF PROGRAM

1. *Describe, in general, the nature of the program, including its purpose, scope, general activities and participants.*

- MHMRCV provides services to people residing in the Concho Valley geographic service area. The primary consumers of mental health (MH) services are those people identified as priority population by the Health and Human Services Commission (HHSC). The primary consumers of substance use disorder (SUD) services are adult people who have met the current Diagnostic & Statistical Manual of Mental Disorders (DSM) criteria for substance use disorders. The primary consumers of services for people with intellectual or developmental disabilities (IDD) are people identified as having a diagnosis of an intellectual disability or related condition or autism spectrum disorder prior to their 18th birthday as defined by HHSC. For further details, refer to the HHSC performance contracts (LMHA Contract) (LIDDA Contract).
- Mental Health Services for Adults and Children include:
 - Outreach
 - Screening
 - Preadmission Assessment
 - Intake and Assessment
 - Crisis Hotline
 - Engagement
 - Case Management
 - Psychiatric Diagnostic Interview Examination
 - Psychosocial Rehab Services (Rural Assertive Community Treatment)
 - Peer Support/Family Support
 - Medication Training and Support
 - Skills Training
 - Supported Employment Services
 - Supportive Housing Services
 - Mobile Crisis Outreach (MCOT)
 - Crisis Stabilization
 - Services for Offenders with Medical or Mental Impairments (TCOOMMI)
 - Military Veteran Peer Network (MVPN)
 - Counseling
 - Crisis Respite
 - Pharmacological Management
 - Co-Occurring Psychiatric and Substance Use Disorder
 - Continuity of Care
 - Jail Based Competency Restoration (JBCR)
 - Youth Empowerment Services Waiver (YES)
 - Primary Health Care Screening and Monitoring
 - Care Coordination

- Jail Diversion
- Pre-Admission Screening & Resident Review
- Crisis Diversion Center
- Jail Continuity of Care
- Substance Use Disorder Services for adults include:
 - Screening and Assessment
 - Individualized Recovery Planning
 - Educational and Process groups
 - Individual/group Counseling
- IDD Services include:
 - Screening
 - Intake & Assessment
 - Determination of Intellectual Disability (IQ testing)
 - Community Support
 - Community Living Options Information Process (CLOIP)
 - Pre-admission Screening and Resident Review (PASRR)
 - Community First Choice (CFC)
 - CLASS Case Management
 - Service Coordination
 - HCS Community and Residential Services
 - Texas Home Living Waiver Services
 - Enhanced Community Coordination (ECC)
 - Individualized Skills and Socialization (ISS) Services
 - Day Habilitation
 - Nursing Services
 - Respite Care Services
 - Employment Assistance/Supported Employment
 - IDD Crisis Services
 - Behavior Support
 - Counseling
 - Vocational Apprenticeship Program
 - Continuity of Care
 - Permanency Planning
 - Interest List
 - Residential Services
 - Habilitation Coordination

F. RECRUITMENT AND ADVERTISEMENT

1. ***Does the public entity engage in any activities to recruit program participants or otherwise inform people of the program's existence?***
 - MHMRCV does engage in public service and educational campaigns designed to inform the general public of services and to provide a medium for first contact. MHMRCV utilizes a multi-media approach to negate the impact of single sensory impairment.

Describe briefly activities involved and materials used.

TYPE OF ACTIVITY	STEPS TAKEN TO ENSURE FULL PARTICIPATION OF PEOPLE W/ DISABILITIES
Governance meetings	Board meetings are conducted in public buildings or MHMRCV buildings, which meet A.D.A accessibility requirements.
Brochures/Pamphlets	MHMRCV pamphlets, brochures, and informational material are published in English and Spanish.
Direct staff contact (face-to-face contacts)	Staff are trained to provide information about services in the language that the person understands. This includes reading materials for people who are unable to read; utilizing interpreters, as needed; assistance in completion of required documentation (including application for services); use of TTY; and home visits as needed.
Social Media	The MHMRCV Facebook page, Instagram, Linked In, and "X" (formerly known as Twitter) accounts are used to inform the public about services.
Radio	MHMRCV provides information about services on the local Foster Communications Dialog radio show.
Community Outreach	The MHMRCV Community Relations/Outreach Coordinator attends various community functions where MHMRCV program information is available to attendees in English and Spanish as well as staff explanation of services in a language that the person understands.
Website	MHMRCV regularly posts information about services and programs as a means to educate the public.

2. Turn to section "J" (Outside Persons and Organizations) of this checklist. List there any "outside" persons and organizations involved in the recruitment, advertising or information efforts.

- See: A through E of "Section J"

3. Turn to section "K" (Facilities Used). List there all facilities, and parts of facilities, used during recruitment and advertising efforts, including those not owned and/or operated by the public entity (e.g., leased or otherwise used). Are these facilities accessible? IF not, is information available in an accessible location?

- See list in "Section I"

G. PROGRAM ELIGIBILITY REQUIREMENTS AND ADMISSION

1. Are any criteria or tests used in the admission process? Yes No

- If no, proceed to "7" below.
- If yes, list and describe briefly all criteria (e.g., good health, residency requirements, letters of recommendation) and all tests (including the skill, level of achievement, or other factors being tested, whether they are written or oral tests, the method of administration) used in the admissions process, and indicate how they relate to the program.

IDD Services

- Demonstrate onset of symptoms prior to 18th birthday;
- Have full scale IQ below 69 or demonstrate significant deficiencies in adaptive living;
- Determination of Intellectual Disability (D.I.D.) - to establish eligibility;
- Autism Spectrum Disorder.

MH Services

- Member of priority population (as defined by DSM and/or HHSC);

SUD Services

- People who have met the Diagnostic & Statistical Manual of Mental Disorders (DSM) criteria for substance use disorders.

NOTE: For details on the specific requirements for “priority population,” refer to the Center’s Performance Contract established by HHSC. ([MH Contract](#))

- 2. List all criteria and tests from “1” above that have (or could have) a disproportionate, adverse impact on disabled program applicants. Discuss briefly the (potential) negative impact for each.**
 - Note: This criterion is utilized to establish disability and does not have a disparate effect.
- 3. For each criterion or test listed in “2” above that you design and administer, discuss briefly alternative criteria or tests that will be used to ensure non-discrimination. This could include, in limited instances, not using a criterion or test.** N/A
- 4. For each item listed in “3” above that is designed and/or administered by an “outside” person or organization, list steps to modify any criterion or test that has a (potential) disproportionate, adverse impact on disabled persons, or class(es) of disabled persons (possibly including, in limited instances, not using a criterion or test).** N/A
- 5. List steps to make potential program participants, including those with hearing and vision impairments and learning disabilities, aware of alternative testing and criteria.**
 - Assessments are conducted by trained/licensed staff, which negates the negative impact of disabilities.
 - These assessments are conducted to establish disability which then qualifies individuals for services.
 - Intake staff is trained to utilize alternative testing/assessment tools to accommodate various disabilities (and to utilize interpretive services necessary to obtain information).
- 6. Is an interview required before an applicant enters the program?** **Yes** **No**
 - **If no, proceed to “7” below.**
 - **If yes, discuss briefly the interview process and list steps to be taken (including the provision of auxiliary aids, as required) to ensure non-discrimination in interviewing.**
 - Interviews are for the purpose of assessment to include identification of disabilities as a justification for program services. Assistance is available for the purpose of providing interpretive services.
- 7. Are any forms required for admission in the program testing or submission or other admissions criteria?** **Yes** **No**
 - **If no, proceed to “10” below.**
 - **If yes, what are the forms, and are any available in alternative formats (e.g., taped, Braille, reader)?**
 - Staff completes all forms.

8. **List steps to provide admission forms in alternative formats.**
- Staff is available for reading assistance.
 - Staff completes applications/forms for patients/consumers.
9. **Do the forms listed in “7” above contain a notice of your organization’s compliance with the ADA?** **Yes** **No**
- **If no, proceed to “10” below.**
 - **If yes, list steps to ensure the inclusion of notices of your compliance with the ADA in all materials.**
- Intake staff give advisory statements which makes potential patients/consumers aware that specialized services are available for disabled persons to facilitate program entry (when being informed of their rights).
10. **List steps to ensure applicants are not asked pre-admission inquires as to the nature and extent of a disability and that no forms or other written materials make mandatory inquiries related to disability.**
- This question is not applicable, as people must demonstrate a disability to qualify for services.
 - People who cannot demonstrate disabilities do not typically meet service requirements.
11. **Turn to section “J.” List there any “outside” persons and organizations involved in testing, collecting or evaluating admissions criteria.** NONE
12. **Turn to section “K.” List there all facilities and parts of facilities used for testing, collecting or submitting forms and admissions criteria and other activities related to program eligibility requirements, including facilities not owned or operated by the public entity (e.g., leased or otherwise used).**
- See section “K” for detailed description of compliance issues by facility location.

H. PARTICIPATION IN THE PROGRAM

1. **Are post-admission inquires made regarding disabled status to make accommodations for disabled persons?** **Yes** **No**
- **If no, proceed to “2” below.**
 - **If yes, list steps to ensure that information is gathered voluntarily, not used to affect any disabled person adversely and kept confidential.**
- Services - All post-admission inquiries are designed to facilitate acquisition of services and eliminate barriers. This information is maintained in confidential files.
2. **Is there an orientation for new participants?** **Yes** **No**
- **If no, proceed to “3” below.**
 - **If yes, describe briefly the orientation and materials used, and list steps to ensure effective communications and usable materials (in alternative formats) for all participants.**
- Staff provide program orientation.

- Multilingual and American Sign Language interpreters are available through Language Line Solutions interpreter service and free of charge to patients/consumers.

3. List all written materials, tools, equipment, other aids or devices used for the program.

- Each program assesses patient's/consumer's needs utilizing standardized assessment protocols such as: uniform assessments, standardized psychological tests, etc.
- An application for service is completed which includes intake forms, financial statements, consent forms, medical and psychiatric histories, case management assessment, etc.

4. For each item in "3" above, list steps (e.g., the provision of auxiliary aids, equipment modification) to ensure that program materials and equipment are accessible and usable.

- Alternative methods are used for written/visual materials to include reading assistance.
- Staff is available to make home visits thus negating any transportation needs.

5. Would any steps pose an undue financial or administrative burden? Yes No

- If yes, list alternative methods of providing accessibility that would not impose an undue financial or administrative burden.

6. What elements or activities are included in the program (e.g., vocational services, music therapy, retirement services, activities of daily living, leisure, skills training, supported housing, supported employment, structured recreational and leisure outings, etc.)?

- All of the above

7. For each element in "6" above, which ones are, or have the potential to be, inaccessible to disabled participants. Describe steps to make them accessible and usable (e.g., the provision of auxiliary aids, use of alternative materials or formats).

- Specialized transportation is available to aid individuals in activity inclusion (wheelchair accessible vans with lifts and tie down straps).
- Specialized dietary and speech services.

8. Are any of the following services or benefits provided to program participants (unless already covered in "6" above)? If none is provided, proceed to "9".

- | | |
|---|---|
| <input checked="" type="checkbox"/> Transportation Services | <input checked="" type="checkbox"/> Counseling Services |
| <input checked="" type="checkbox"/> Employment Services | <input checked="" type="checkbox"/> Health Services |
| <input checked="" type="checkbox"/> Housing | <input type="checkbox"/> Food Services |
| <input checked="" type="checkbox"/> Financial Aid | <input checked="" type="checkbox"/> Social/Recreational/Athletic Activities |

List other services provided to program participants.

Medication Services
Nursing Services
Psychiatric Services
Case Management

Physician Services
Counseling
Psychosocial Rehab.
Peer Support/Family Partner
Substance Use Disorder Services

List Steps to ensure that:

- **Service/benefit is equally effective for and usable by disabled persons;**
- **Administration of service/benefit will be free from discrimination based on disability;**
- **Communications will reach all people (including those with hearing and sight impairments); and**
- **Effective application procedures to receive the services exist for disabled persons (including those with hearing vision impairments).**

- It is the function of the interdisciplinary team to assess each person's needs and determine any specialized accommodations which are required to maximize service utilization. The function of the service coordination/case management unit is to eliminate barriers to services for all recipients both internal and external to the Center.

9. List steps to ensure that information concerning program schedules and activities are effectively communicated to all program participants, including those with impaired vision and hearing.

- The facility pursues program participation by:
 - Providing transportation to and from program sites.
 - Providing case management services.
 - Ensuring that notification of scheduled services is provided both orally and in writing.

10. Are there boards, councils or similar bodies on which program participants sit?

Yes **No**

- **If no, proceed to "11" below.**
- **If yes, list steps to ensure equal opportunities for selection to, and participation in boards by disabled persons.**

- Representation within these governing bodies requires consumer/disabled participants or family members/guardians who represent the disabled party.

11. Turn to section "J." List there any "outside" persons or organizations involved in any aspect of the program.

12. Turn to section "K." List there all facilities, and parts of facilities, used during the program, including those not owned and/or operated by the recipient (e.g., leased or otherwise used).

13. Are each of these facilities accessible to people with disabilities, including people who use wheelchairs? If not, is the program, "when viewed in its entirety, "accessible"?"

Yes **No**

- **If no, what steps will be taken to make it accessible? (If structural changes are necessary for building the public entity owns or operates, this should be documented in the transition plan.)**

I. STAFF INFORMATION

1. *List steps to ensure that all staff involved in this program (e.g., recruitment, admission, testing, conduct of the program, the provision of any services or benefits) will be informed periodically of, and understand fully, your policy of non-discrimination on the basis of disability.*

- Upon employment staff are informed of the policy on A.D.A. accommodation.
- Staff receive periodic training which reaffirms the agency’s participation.
- Contracts with providers include the requirement not to discriminate.

J. “OUTSIDE” PERSONS AND ORGANIZATIONS

1. *List below all “outside” persons and organizations that are involved in the provision of any aid, benefit or service for the program (as discussed in sections “C” through “E” above).*

CONTRACTED SERVICES/INTERLOCAL AGREEMENTS:

Avail Solutions, Inc.
East Texas Behavioral Health Network (ETBHN)
West Texas Counseling and Guidance
Shannon Behavioral Health
Shannon Clinic
Shannon Hospital
Shannon River Crest Hospital
Language Line Solutions
IDD Host Home Providers
Personal Assistance Services/Habilitation
Respite Providers
Peer Providers
Family Partner
Local Rehab providers
Tarrytown Pharmacy
Local dental providers
FasPsych, LLC
ResCare Crisis Respite
D&S Crisis Respite
Sing Your Way Home
Sonrisas Riding Trails
Torres Wound Care
Specialized Recreational Therapy
Coke/Concho/Crockett/Reagan/Sterling/Tom Green County – MH Deputy
Hands Up Interpreting and Consulting, LLC
Joel L. Carr, Ph.D., Organizational Consultant
Jelly Nonprofit Consulting
Genoa
Rescare Crisis Respite Services
Daybreak Crisis Respite Services
CARMAhealth
Cedar Crest Hospital
Scenic Mountain Behavioral Health
Fresh Start Individualized Skills & Socialization

2. **List steps to inform those listed in “1” above of your organization’s commitment to non-discrimination on the basis of disability. Remember that the non-discrimination mandate extends to the awarding of procurement contracts.**
 - Each contract includes a statement that requires the contractor not to discriminate based on disability.
3. **List those persons and organizations from “1” above that receive “significant assistance” from your organization in the provision of aids, benefits or services to your program participants. (For example, list organizations which rent or otherwise use your facilities; that depend on your organization for informing its participants of the aid, benefit or service; that have employees of your organization spending time to assist in or coordinate the provision of the aid, benefit or service; and so forth.)** NONE
4. **List steps to ensure that persons or organizations listed in “3” above do not discriminate on the basis of disability in the provision of any aid, benefit or service to your program participants. (Such steps may include changes in the program, facility alternation, and/or changes in or discontinuation of the relationship.)** N/A

K. FACILITIES USED

(NOTE: The definition of “facility” under the ADA includes all or any portion of buildings, structures, equipment, roads, walks, parking lots or other real or personal property or interest in such property, owned, operated or leased.)

1. **List below all facilities, or portions of facilities, used for the activities covered in sections “D” through “F” above, designating for each the activity for which it is used. (NOTE: Facilities leased or otherwise used from another person or organization should be included.)**
 - MHMRCV MAIN CAMPUS – 1501 W. Beauregard
 - IDD Authority Services: Authority services for people diagnosed with intellectual and/or developmental disabilities or other qualifying developmental delays. Includes intake and admissions, and service coordination (GR, HCS & TxHmL).
 - IDD Provider Services: Provider services for people diagnosed with intellectual and/or developmental disabilities or other qualifying developmental delays. Training is provided on daily living skills and supportive employment with an emphasis on community inclusion. Specialized adaptive equipment for transportation and communication purposes are available. Includes the adult Individual Skills & Socialization (ISS) program, which is fully accessible as well as Medicaid waiver programs (HCS, TxHmL).
 - Administration: Administrative headquarters includes authority functions, purchasing, Human Resources, accounting.
 - MHMRCV ADULT BEHAVIORAL HEALTH OUTPATIENT CLINIC – 202 N. Main St.
 - The Behavioral Health Outpatient Clinic provides outpatient psychiatric services to adults meeting the HHSC defined Mental Health priority population. Screening, intake, admission, case management,

pharmacological management, nursing services, skills training, supported employment and benefits assistance services are also provided out of this building. This program is fully accessible.

- The Behavioral Health Outpatient Clinic provides outpatient substance use disorder services to adults meeting the diagnostic impression of the DSM criteria for substance use disorder. Screening and assessment, individualized recovery planning, educational and process groups, and individual/group counseling services are provided out of this building. This program is fully accessible.
- MHMRCV FAMILY & YOUTH GUIDANCE CENTER – 424 S. Oakes St.
 - The Family & Youth Guidance Center provides outpatient psychiatric services to children and adolescents meeting the HHSC defined Mental Health priority population. Screening, intake, admission, case management, pharmacological management, skills training, family partner services, and counseling are also provided out of this building. This program is fully accessible.
- MHMRCV YES WAIVER SERVICES - 902 Spaulding St.
 - The Youth Empowerment Services (YES) program is a Home and Community Based Services Waiver program that provides a broad array of in-home services as well as other alternative community services and supports in intensive therapeutic and psychiatric rehabilitative services all to assist children and adolescents with severe emotional disturbances to live in the community with their families. The program aims to: reduce the amount of time the child is out of their home and community because of a mental health need, expand available mental health services and support and improve the lives of children and youth.
- DR. LLOYD DOWNING BEHAVIORAL HEALTH CAMPUS – 244 N. Magdalen, Bldg.#s 240, 242, 244, 250, 262
 - Building #240 is the location of MHMRCV's adult mental health Crisis Respite Facility. This program is fully accessible.
 - Building #242 is the location of MHMRCV's: adult MH "Rural Assertive Community Treatment Team" (The majority of the psychosocial rehab services are delivered in vivo), Mobile Crisis Outreach Team (MCOT), and Jail-based Competency Restoration (JBCR) program. These programs are fully accessible.
 - Building #244 is the location of MHMRCV's IDD Day Services and Evolution Group Narcotics Anonymous support group. This program is fully accessible.
 - Building #250 is the location of MHMRCV's Crisis Diversion Center. This program is fully accessible.
 - Building #262 is the location of MHMRCV's adult mental health Supportive Housing Rental Assistance program. Section 811 Project Rental

Assistance Contract (PRAC) program provides project-based rental assistance for extremely low-income people with disabilities linked with long term services through Housing and Urban Development funding. This program is fully accessible.

- THE SAN ANGELO CLUBHOUSE – 404 South Irving St.
 - The San Angelo Clubhouse location provides adults living with a MH diagnosis a place to spend the day, build relationships, receive assistance with personal goals, and learn vocational and life skills that can enrich their lives and our community. Eligible members must have a mental health diagnosis, be at least 18 years of age, follow a treatment plan and not be a danger to self or others. This program is fully accessible.

- MHMRCV IDD Residential Homes: 5 locations

116 North Adams St.	San Angelo	TX 76901
2417 W. Beauregard Ave.	San Angelo	TX 76901
1818 High Butte Dr.	San Angelo	TX 76905
3922 High Meadow Dr.	San Angelo	TX 76904
2905 Nueces Dr.	San Angelo	TX 76901

- The MHMR IDD residential home locations provide room and board for eligible adults with IDD.
 - This program is fully accessible.
- MHMR IDD Host Homes: 25 Host home providers
 - The IDD host homes provide foster care type services for people with IDD.
 - This program is fully accessible.

2. Using the Texas Accessibility Standards and the ADA Accessibility Guidelines:

(i) **List below for each facility (or portion thereof) inaccessible feature that limits program accessibility, but which can be addressed by means other than structural changes. For each feature, list non-structural measures that will be taken to ensure accessibility when the program is “viewed in its entirety,” including:**

- ✓ Relocating the activity to accessible space;
- ✓ Being able to relocate the activity to accessible space, upon notice of the needs of a qualified disabled person;
- ✓ Revising the structure or format of the activity so the space is not needed;
- ✓ Modifying or redesigning equipment;
- ✓ Making home visits or other alternative delivery services; or
- ✓ Otherwise achieving program accessibility; and
- ✓ The time frame for compilations of each correction.

Site	Accessibility Issue	Action to take	Estimated Completion Date	Actual Completion Date
N/A	N/A	N/A	N/A	N/A

(ii) **If non-structural changes cannot achieve program accessibility, place the feature on transition plan for necessary structural changes (see Section “L”).**

Site	Accessibility Issue(s)	Action to be taken	Estimated Completion Date	Actual Completion Date
N/A	N/A	N/A	N/A	N/A

3. **List steps to ensure that all future construction and renovation work will comply with the architectural and accessibility standards (excluding projects managed by Central Office Maintenance and Construction).**
 - All contracts for facilities will refer to the “Texas Accessibility Standards” as the construction standard for A.D.A. adherence.
4. **List steps to ensure periodic communications with (potential) disabled program participants concerning accessible and inaccessible facilities.**
 - All program participants by definition are disabled. Service Coordinators/Case Managers and other staff make participants aware of accessibility issues to include accessible restroom (toilet) facilities. The Center’s Risk Management Committee would address any instances of inaccessible facilities.
5. **Is the facility in question considered “historic” (e.g., is it either on the National Register of Historic Places or on a state or local list of historic places)?** Yes No
 - If yes, list steps to ensure program accessibility, including any structural changes. If structural changes would compromise the historic value, list alternative methods to ensure program accessibility. (Note: Only those programs that uniquely concern the preservation and experience of the historic property itself are covered by this exemption. If the program held at a historic facility is not a “historic preservation” program, it must be relocated if structural accessibility is not possible.)

L. EMPLOYMENT

1. **List safeguards in place to ensure that all employment decisions are made without discrimination on the basis of disability, and that such decisions do not limit, segregate or classify applicants or employees based on disability in a way that adversely affects their employment opportunities or status.**
 - All position vacancies are posted and advertised on the MHMRCV Website, social media accounts, and Indeed.com.
 - Interviews are conducted with prepared questions that may be reviewed by Human Resources to ensure ADA compliance.
 - Staff are trained in proper candidate selection techniques.
2. **Are you participating in a contractual or other arrangement or relationship that subjects qualified applicants or employees with a disability to discrimination (i.e., relationships with employment or referral agencies, labor unions, or organizations that provide fringe benefits, training, or apprenticeship programs)?** Yes No
 - If yes, list steps to be taken to ensure non-discrimination in the future.
3. **Analyze the following aspects of employment to make certain that no discrimination based on disability exists (including discrimination which occurs due to an inaccessible facility):**

ASPECTS OF EMPLOYMENT	DETERMINATION
Recruiting, advertising, and processing applications for employment	No discrimination
Hiring, upgrading, promotion, award of tenure, demotion, transfer, layoff, termination, right of return from layoff, and rehiring	No discrimination
Rates of pay or another form of compensation and changes in compensation	No discrimination
Job assignments, job classifications, organizational structures, position descriptions, lines of progression, and seniority lists	No discrimination
All forms of leave	No discrimination
Equal benefits and privileges available by virtue of employment, whether or not administered by the recipient	No discrimination
Selection and financial support for training, including apprenticeship, professional meetings, conferences and other related activities, and selection for leaves of absence to pursue training	No discrimination
Employer sponsored activities, including social and recreational programs	No discrimination
Any other term, condition or privilege of employment	No discrimination

4. **Do you have a policy concerning “reasonable accommodation” that specifies the decision-making process for identifying, arranging for and/or paying for, and determining undue hardship for reasonable accommodation?** Yes No

If no, list steps to be taken to establish a reasonable accommodation policy.

- MHMRCV will abide by established HHSC policy regarding accommodations for disabled employees.
5. **What employment tests or criteria are used for evaluating potential employees? Describe procedures to ensure that these criteria or tests do not discriminate against disabled persons, unless they are shown to be consistent with job necessity and are directly related to the essential functions of the position.**

EMPLOYMENT TEST OR CRITERIA	IMPACT
Criminal record screening	No adverse impact
Drug screening	No adverse impact
Interview and selection process consistent with HHSC methodology	No adverse impact
Client Abuse and Neglect Reporting System (CANRS) inquiry	No adverse impact
Driving History - job necessity	No adverse impact
Employee and Nurse Aide Misconduct Registry	No adverse impact

6. **Describe methods to identify the job-related characteristics of tests and criteria used in employment decisions.**

- Job analysis identifies essential and non-essential job tasks.
- Test and interview methodology related directly to position description and identified essential elements.

7. **Describe steps to ensure that no pre-employment inquiries are made as to whether an applicant is a disabled person or as to the nature or severity of a disability. (Inquiries**

related to one's ability to perform the essential functions of a job effectively and safely are permitted.)

- Application contains no pre-offer inquiries.
- All interrogatories are approved by Human Resources office.
- All interrogatories are related specifically to essential elements of the position description.

8. Does your organization conduct or require any medical exams or physical capacity assessments prior to making final offers of employment? Yes No

- **If yes, describe procedures to ensure that a) all entering employees are subject to medical exams, b) all offers of employment are conditional based on the results of the exams, c) the medical results gathered are not used in a discriminatory manner, and d) all information gathered is kept confidential. Pre-employment medical examinations before conditional job offers are not permitted.**

9. Review job application forms and interview questions to ensure that applicants are not asked about the existence of (or nature of severity of) a disability. You are allowed to inquire about the candidate's ability to perform job functions. Ensure that applicants are not asked about their relationship or association with a disabled individual.

- Such review is conducted by Human Resources prior to interview by hiring authority.
- Employment - Information may be obtained through post hire inquiries to determine if applicants require accommodation. If the employee chooses to disclose a disability, then this information will be securely maintained in the Human Resources Department in a confidential personnel record.

10. Review the essential and marginal functions of existing positions descriptions for each position in your organization for use in determining what makes applicants "qualified" and what job accommodations can be made when necessary for an applicant or employee.

- Each position description is based on job analysis which identifies essential and nonessential functions of the position. Requests for accommodation are reviewed on an individual basis with determinations made based on cost and facility's ability to provide the requested accommodation.

11. Describe the process used to determine the essential and marginal tasks of positions descriptions in your organization and the process for ensuring that position descriptions are kept current.

- Each job posting requires a review by the hiring authority. New positions require job analysis. Positions are updated as functions are modified or changed.

M. COMMUNICATIONS

1. Provision of Auxiliary Aids

List auxiliary aids that are available (or sources where they can be obtained) for individuals with speech, vision or hearing impairments. This can include qualified readers and interpreters, taped, brailed or large-print materials, or closed-captioned video programs.

- Readers
 - Interpreters
 - Phone access for vision impaired
 - Written materials
 - Specialized communication devices
 - Telephone services for people with hearing impairments
 - Contract with Language Line Solutions for foreign language and hearing-impaired interpreter services.
 - Contract with Hands-Up Interpreting and Consulting, LLC for hearing-impaired interpreter services.
2. ***Are auxiliary aids provided to individuals with hearing, speech or vision impairments when needed to ensure effective participation in a program or activity? If no, list steps to ensure that auxiliary aids are provided to overcome communication barriers.***
- Yes, on an as needed basis.

3. **Telecommunication Devices for the Deaf**

Does the public entity provide services or information to the general public over the telephone? Yes No

If yes, is a telecommunication device for the deaf (TDD) or other equally effective system available so that public entities can communicate with hearing-impaired and speech-impaired individuals? Yes No

If no, list steps to ensure effective communication with hearing-impaired and speech-impaired individuals. This can include providing a TDD or relying on a third-party relay service. The Justice Department encourages entities that have extensive phone contact with the public to have TDDs to assure more immediate access.

- MHMRCV utilizes the TDD services available through Relay Texas.
- MHMRCV has a contract with Language Line Solutions for interpreter services via secure tele/video for people who are deaf or hearing impaired.
- MHMRCV has a contract with Hands-Up Interpreting and Consulting, LLC for hearing-impaired interpreter services.

4. **Information and Signage**

Is information provided concerning the following?

INFORMATION AND SIGNAGE	CENTER RESPONSE
Signage at inaccessible entrances directing people to an accessible entrance or a location with information about an accessible entrance.	All sites have been reviewed for accessibility signage.
Signage directing people to elevators and stairways	All sites have been reviewed for accessibility signage. The Administration building is the only facility with an elevator and stairway.
Signage concerning the availability and location of TDD equipped pay phones or portable TDD's	MHMRCV has posted informational brochures providing user information about "Relay Texas" services and the Center has completed employee awareness training to address needs of hearing-impaired persons.
Signage should comply with 4.30 of the Texas Accessibility Standards and the ADA Accessibility Guidelines.	In compliance.



ADA SELF-EVALUATION and TRANSITION PLAN

FY 2025

THIS ADA SELF-EVALUATION AND TRANSITION PLAN HAS BEEN REVIEWED
AND APPROVED BY:

Gregory J. Rowe, Chief Executive Officer