

DHS-PB-2024-002

<p>SUBJECT:</p> <p>Determining ADA Accessible Placements</p>	<p>APPLICABLE TO:</p> <p>All DHS Directly Operated or Contracted Facilities / Programs Serving Homeless Single Adults, Adult Families, and Families with Children</p>	<p>ISSUED:</p> <p>February 9, 2024</p>
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<p>ADMINISTERED BY:</p> <p>Division of Adult Services Division of Family Services Street Homeless Solutions</p>	<p>APPROVED BY:</p> <p>Joslyn Carter, Administrator Department of Social Services/ Department of Homeless Services</p>
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■ INTRODUCTION

The New York City Department of Homeless Services (DHS) is required by the Americans with Disabilities Act (ADA) and other federal, state, and local laws and social service regulations (“applicable law”) to provide meaningful access to temporary housing assistance, programs, and services for individuals and/or families with disabilities seeking or receiving DHS shelter and services. The reasonable accommodation process is interactive, and DHS will consider reasonable accommodation requests (RARs) on an individualized basis to ensure the needs of clients with disabilities are met in DHS services and shelter placement.

■ PURPOSE

Reasonable accommodations for people with disabilities vary because functional needs are unique. In collaboration with Steven Winter Associates, Inc., DHS created this reference guide on determining the accessibility of a placement for clients with disabilities. This reference guide is meant to assist staff in placing clients with disabilities needing reasonable accommodations (RA) in appropriate facilities that meet their needs. This guide focuses on physical accessibility features within DHS shelters and offers guidance for identifying placement with suitable features to meet an individual client’s needs.

■ REQUIRED ACTION

Use the guidance below when a client has an obvious/apparent or approved need for certain accessibility features to ascertain how best to fulfill the RA and/or what the client may specifically need to fulfill the RA (such as accessibility features a client requires in the bathroom or placement). Staff must:

- Engage the client in an interactive conversation about their disability-related access needs.
- Using the guided questions below, engage with the client about accessibility-related needs and if they have access barriers to entering, navigating, or using any features in their facility and individual placement, including the available bathroom(s).
- After engaging with the client using the guided questions, work with your supervisor to find an available placement within a facility that is accessible for the client and that has a unit and/or bathroom with features necessary to meet the client's needs.
- Ensure all RAs based on obvious/apparent needs and other RAs for accessible placements or specific features are documented in RAMS, in accordance with the Interim RA Procedure.
- If a client's current placement does not meet their accessibility needs, speak with your supervisor to ensure they are provided a transfer to a unit that is accessible to them as soon as possible.
- Reach out to your Program Administrator (PA) if additional assistance is needed by staff and/or supervisors.

Accessibility Guidance

Category	Questions for Clients	Placement Considerations
<i>Getting into the Building</i>	<p>Can you safely and comfortably navigate the building entrance/exit?</p> <p>Can you safely and comfortably navigate one or more steps?</p>	<p>If the client cannot, use a placement with:</p> <ul style="list-style-type: none"> • Without steps or with an elevator • Buildings with entrances at grade or those that include gradually sloped walks or ramps, elevators, or lifts • Avoiding facilities with steps inside the building that lead to the client's unit or to shared spaces

<p><i>Opening and Using Doors</i></p>	<p>Can you easily operate a doorknob?</p>	<p>If the client cannot, use a placement that has the following:</p> <ul style="list-style-type: none"> • With operable parts that do not require tight grasping or twisting of the wrist • Suitable parts include lever hardware on doors with staff or security at or near the entrance 24/7 so that they may be consistently available to assist with the doors.
<p><i>Maneuvering through the Doorway/Elevator/Hallways</i></p>	<p>Can you easily approach a door, open it, and move through the doorway?</p> <p>Is there space for you to do this with a mobility device (e.g., wheelchair, walker, cane)?</p> <p>Can you enter and maneuver within the elevator with a mobility device (e.g., wheelchair, walker, cane)?</p>	<p>If the client cannot, use a placement:</p> <ul style="list-style-type: none"> • With ample clearance on both sides of the door to support the use of a mobility device • With wide doorways (e.g., at least 32 inches) • Additional space to support maneuvering with a walker or cane • Added space in front of doors to support those who use a wheelchair • With a wider elevator clearance (e.g., at least 32 inches)

<i>Using Operable/Moveable Parts</i>	Can you easily reach above your shoulder?	<p>If the client cannot, need to offer a placement:</p> <ul style="list-style-type: none"> • With operable parts that are mounted low on the wall (e.g., no more than 48 inches above the floor) in the client's unit (if unit is a single or double room) • Where light switches and other operable parts can be adjusted to a lower mount on the wall (e.g., no more than 48 inches above the floor) (if unit is a single or double room) • With operable parts (e.g., wall mounted paper towel or napkin dispensers) that are lower on the wall or can be lowered (in bathrooms and common areas)
<i>Alarms</i>	<p>Can you hear fire alarms or doorbells without the need for visual cues?</p> <p>Can you hear verbal instructions for emergency evacuations?</p>	<p>If the client cannot, place client in a unit/dorm:</p> <ul style="list-style-type: none"> • Where visual fire alarms (strobe lights) can be installed if not already present • Where doorbells with a visual signal for units can be installed if not already present

Accessible Bathroom Guidance

<i>Using the Sink and Shower Controls</i>	Can you easily operate knob-type sink or shower controls?	<p>If the client cannot, best to consider a placement:</p> <ul style="list-style-type: none"> • With operable parts that do not require tight grasping or twisting of the wrist (e.g., paddle-type faucets and bathing controls) • Where operable parts that do not require tight grasping or twisting of the wrist (e.g., paddle-type faucets and bathing controls) can be installed
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<i>Using Operable Parts</i>	Can you easily reach above your shoulder?	<p>If the client cannot, best to consider a placement:</p> <ul style="list-style-type: none"> • With light switches and other operable parts that are mounted low on the bathroom wall (e.g., no more than 48 inches above the floor) • With operable parts (e.g., soap dispensers, paper towel dispensers, hand dryers) that are lower on the bathroom wall or can be lowered
<i>Using the Sink and Mirror</i>	Can you access a bathroom sink and mirror placed at any height?	<p>If the client cannot, best to consider a placement:</p> <ul style="list-style-type: none"> • With open space below the sink • Low or tilted mirror (mounted low on wall). These are best for people who use wheelchairs or are short in stature.
<i>Using the Toilet and Shower</i>	Can you safely and comfortably get on and off the toilet seat and into and out of the shower without holding onto something?	<p>If the client cannot, best to consider a placement:</p> <ul style="list-style-type: none"> • With grab bars installed on the walls next to and behind toilets • With grab bars installed inside of showers • With a toilet lift or commode
<i>Using the Toilet and Shower</i>	Can you easily use the toilet without the need for large amounts of space around it for their mobility device (e.g., wheelchair, walker, cane)?	<p>If the client cannot, best to consider a placement:</p> <ul style="list-style-type: none"> • That has a large amount of space at the toilet • That has a large amount of space at the sink • That has a large amount of space at the shower
<i>Using the Shower</i>	Can you safely and comfortably shower while standing?	<p>If the client cannot, best to consider a placement:</p> <ul style="list-style-type: none"> • That has a shower with a seat • A roll-in shower • Grab bars inside the shower <p>Or, if necessary:</p> <ul style="list-style-type: none"> • Provide a hand-held shower head • Provide a shower chair • Provide an over-the-tub shower bench

<i>Entering the Shower</i>	Can you safely and comfortably enter a shower by stepping over a short curb (threshold) at the floor?	If the client cannot, best to consider a placement: <ul style="list-style-type: none"> • With a shower that does not have a curb (threshold) • With a shower that has a low-profile sloped curb (threshold) • With a tub and providing a swivel shower chair
<i>Alarms</i>	Can you hear fire alarms without the need for visual cues?	If the client cannot, best to consider a placement: <ul style="list-style-type: none"> • Where visual fire alarms (strobe lights) can be installed in the bathroom

Additional Assistance

Case management and other social services staff who need assistance or have questions about the above information can reach out to the Office of Disability Affairs (ODA) or the Disability Access and Functional Needs (DAFN) Unit for help:

- Office of Disability Affairs: disabilityaffairs@dss.nyc.gov
- Disability Access and Functional Needs: DAFNRArequests@dhs.nyc.gov

Effective Immediately