



Accessibility Plan
FY 2021-FY 2022



Our Mission is to assist the Developmental Disabled and Elderly Disabled to achieve community inclusion that enhances personal potential, employment opportunities, and /or volunteerism.

**Accessibility Plan
FY 2021 – FY 2022**

I. Policy:

It is the policy of Arkay, Inc. to identify and diligently work towards the removal of all architectural, environmental, attitudinal, financial, employment, transportation, communication, community integration, technological, and any other barriers to persons served, Board of Directors, employees, volunteers, interns and those doing business with Arkay, Inc.

II. Purpose:

- A. To promote the recruitment of persons served with disabilities or their personal representatives, as appropriate, as members of the governance authority (board of directors, ARKAY, INC. committees, etc.), staff members, interns and volunteers within the organization.
- B. To provide necessary reasonable accommodations and supports to promote equal opportunity for participation of persons with disabilities as members of the governance authority, staff members, interns and volunteers.
- C. To provide for the organization's participation in community efforts to promote diversity, economic, advocacy and social opportunities for persons served with disabilities.
- D. To provide opportunities in all programs, services and employment will be available to otherwise qualified persons served, employees, interns, volunteers and applicants with disabilities.
- E. To eliminate/reduce attitudinal and other barriers within our organization and the community.

III. Application:

This applies to persons served by Arkay, Inc., employees, interns, volunteers and those doing business with our Organization.

IV. Definitions:

- 1. Accessibility Coordinator: Coordinates activities in providing accessibility for persons served, employees, interns, volunteers and those doing business with our Organization.
- 2. The Health/Safety (Accessibility) Committee: Oversees accessibility at business units.

3. ADA: Americans with Disability Act of 1990 effective date July 26, 1992 including changes made by ADA Amendment Act of 2008.
 - i. Title I covers employment provisions prohibiting discrimination in any terms or conditions of employment for qualified individuals with a disability.
 - ii. Title II covers public service provisions which require that services offered by public entities be accessible and available to persons with disabilities. It also requires the public transportation system to be accessible to persons with disabilities. 2010 ADA Standards effective March 15, 2012.
 - iii. Title III covers public accommodation for persons with disabilities. 2010 ADA Standards effective March 15, 2012.
 - iv. Title IV covers telecommunication provisions.
4. Organization: Arkay, Inc.
5. Disability: Defined as a limitation that a person has within one or more of these categories:
 - i. A physical or mental impairment that substantially limits one or more major life activities; Major Life Activities include: caring for oneself, performing walking, seeing, hearing, sitting, speaking, breathing, learning, working, and participating in community activities. It also includes such things as cognitive skills and the capacities to remember and reason.
 - ii. A record of impairment; or,
 - iii. Is regarded as impairment.
6. Direct Threat: A significant risk of substantial harm to oneself or others which cannot be eliminated by reasonable accommodation.
7. Otherwise Qualified Person: An individual with a disability who, with or without reasonable modifications to rules, policies, or practices, and with the removal of architectural, communication, or transportation barriers, or the provision of auxiliary aids and services, meets the essential eligibility requirements for the services or employment.
8. Reasonable Accommodation: Modifications or adjustments that assist persons served employees, volunteers and others with a disability to programs, services and employment that are equal to those that are enjoyed by others. Examples taken from the American with Disabilities Act include such activities as: making existing facilities readily accessible to and usable by people with disabilities; job restructuring; modifying work schedules; reassignment; acquiring or modifying equipment or assistive devices; adjusting or modifying examinations, training materials, policies and procedures; and providing qualified readers or interpreters.
9. Service Provider: An organization which contracts with Detroit Wayne Mental Health Authority (DWMHA) through a Managed Comprehensive Provider Network (MCPN) or directly through a Mental Health Authority to provide mental health &/or developmental disability services in Wayne, Oakland, & Monroe Counties.
10. Undue Hardship: An Undue Hardship is an action requiring significant difficulty or expense, as determined by the following factors:
 - i. The nature and cost of accommodation; and/or
 - ii. The overall financial resources of the business and the impact of such accommodation upon it.

V. Standards:

- A. The Organization, as a service provider, will comply with all statutes guiding accessibility requirements for business units, programs, services and employment. (See referenced legal authorities)
- B. Arkay will maintain a Health & Safety (Accessibility) Committee (including representatives from various business units) which meets regularly but not less than once annually (or address Accessibility at the Quarterly Safety Committee Meetings), for the purpose of identifying and removing architectural, environmental, attitudinal, financial, employment, transportation, communication and any other barriers to full participation of persons with disabilities in its programs, services and employment.
- C. The Organization will provide board members, staff members and the community with sensitivity training to heighten their consciousness of persons with disabilities.
- D. While persons served by our Organization are not covered fully by the Americans with Disabilities Act (ADA) there are articles/titles in the law which extends protection from discrimination.
- E. Therefore, Arkay, Inc. will adhere to the spirit and intent of these laws and with the recommendations of The Commission on Accreditation of Rehabilitation Facilities (CARF), provide access for persons served to programs, services, transportation, employment, communications and resource centers.
- F. Persons served involved in community employment are covered under the American with Disabilities Act (ADA).
- G. Accessibility for persons with disabilities is covered in the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and the Architectural Barriers Act and the American National Standards Institute (ANSI) for buildings and facilities.

VI. Procedures:

The Executive Director will appoint a staff member for the duties and responsibilities of an accessibility coordinator for a three (3) year term. The accessibility coordinator shall serve for a three-year term. The accessibility coordinator will appoint an assistant as a backup accessibility coordinator.

Quality Circle / Assurance has the responsibility to monitor Organization compliance to all policies and procedures.

Position responsible for revisions will be the Accessibility Coordinator. (Corporate Compliance Officer assumes the role of Accessibility Coordinator.)

A. DUTIES AND RESPONSIBILITIES OF THE ACCESSIBILITY COORDINATOR:

- 1. Monitor and facilitate the Organization's compliance with applicable regulatory statutes, Policies and Procedures as they relate to accessibility the Commission on Accreditation of Rehabilitation Facilities (CARF) Standards.
- 2. Disseminate information to our Organization's board of directors, management, employees, volunteers, interns and persons served.

3. Facilitate the recruitment of qualified persons served for the board of directors, employees and volunteers.
4. The Program Director will attempt to make accommodations when it is evident that recommendations for reasonable accommodations may be necessary to admit a person for ARKAY, INC. services. If accommodations cannot be resolved, then a referral to the Accessibility Coordinator should be completed.
5. Identify and monitor ways to modify the Organization's environment, communication programs and services and employment to enable otherwise qualified persons' equal opportunity for full participation.
6. The Consumer Advisory Committee shall review accessibility and barriers to accessibility at least annually. A report or minutes shall be submitted to the Program Accessibility Coordinator (Corporate Compliance) to ensure consumer input into the Organization's Accessibility Plan/Report.
7. The Health & Safety/Accessibility shall meet no less than quarterly and review accessibility. Recommendations shall be submitted to the Accessibility Coordinator (Corporate Compliance).
8. Review annually, the Consumer Advisory Committee's and the Health & Safety (Accessibility) Committee's recommendations, implemented accommodations with the Accessibility Coordinator to assure reasonable accommodations, identification and removal of accessibility barriers, and to act as a consultant for resolutions and accommodations.
9. Keep the president/CEO informed of the Organization's compliance with the Accessibility Policy and Procedures.
10. Submit an Annual Accessibility Report/Plan to the Executive Director during the first quarter of the fiscal year.
11. The CEO will review and analyze the Annual Accessibility Report/Plan. It will then be presented to the Consumer Advisory Committee during the second quarter of the fiscal year.
12. The CEO will provide the board of directors with an Annual Accessibility Report/Plan during the fourth quarter of the fiscal year.
13. Organize and coordinate the implementation of the Organization's Annual Accessibility Plan/Report.

B. Accommodation Requests.

A person served, employee, volunteer or intern may request reasonable accommodation to overcome barriers to his/her participation in the Organization's programs, services, employment, transportation communication, and other barriers. The following procedure is established for requesting accommodations that have not been adequately addressed in the IPS/PCP or resolved by the Program Director.

1. Complete the Accommodation Request Form. Include as much specific information as possible. The completed form will be submitted to the Organization Accessibility Coordinator and the involved program director.
2. Upon receipt of the completed Accommodation Request Form the accessibility coordinator, in consultation with the involved Program Director will review the request within five (5) working days and determine if the accommodation can be accomplished without further review.
3. The accessibility coordinator will reply in writing within (10) days after the receipt of the request. The response will be entered on Part A of the Accommodation Request Form. The response will indicate what action is to be taken. Copies of the completed form will be forwarded to the executive director, and involved program director.

If the accessibility coordinator and the involved program director determine one of the following outcomes:

- i. Cannot be provided under the limits of their authority;
- ii. Is not considered an appropriate accommodation; or
- iii. Requires more specific information to make an appropriate decision; or
- iv. The granting of the accommodation creates an undue hardship.

Then the request and written recommendation will be referred to the Executive Director within ten (10) working days after the receipt of the request. A meeting will be held within five (5) working days after receipt of the recommendation between the Executive Director, the accessibility coordinator, the involved program director, and the person requesting the accommodation.

4. Should the Executive Director's decision not be acceptable to the person making the request, the matter will be referred to the Consumer Advisory Committee at their next scheduled meeting. A copy of their final decision on the Accommodation Request will be forwarded to accessibility coordinator, the involved program director and the person making the request.
5. In the case of a person served, if it is determined that the costs to make accommodation create an undue hardship, a referral for additional assistance will be made to the appropriate MCPN and/or Mental Health Authority (MHA). If additional assistance is not available through the MCPN and /or MHA, then a referral will be made to another organization provided that service provider is both receptive and accessible.
6. If resources are not readily available and the Accessibility Policy and Procedures have been adhered to and documented, the Organization may deny admission according the Admissions Policy and Procedure.
7. Persons with disabilities who are not satisfied with the Organization's final decision may pursue Arkay, Inc.'s Dispute Resolution, Recipients Rights, and/or Equal Rights Opportunity Commission.
8. The Organization shall have the right with reasonable cause to require an appropriate reasonable accommodation where necessary to enable a qualified person with disabilities to perform essential job functions. Appropriate community agencies possessing specific expertise and funding may be contacted for assistance.

C. Criteria for Provisions of a Reasonable Accommodation.

1. Suitability of Accommodation: Is it reasonable? The accommodation must meet the purpose for which it is intended.
2. Cost Effectiveness: The accommodation must represent the most cost effective approach to resolving the problem. Steps to be taken in order of priority.
 - i. Utilization of existing resources e.g., reorganization of space and equipment, reassignments if possible, modification to the environment.
 - ii. Purchase of new equipment. Items may be purchased when they are not already available or when accommodation requires specific devices.
 - iii. The accommodation must not pose an undue hardship on the Organization.

D. Evaluation of the Accommodation.

Sixty (60) calendar days after the accommodation has been provided, the person who made the request, the program director and the accessibility coordinator will complete a written evaluation of the accommodation. It should provide as specific information as possible, including the following:

1. Does the accommodation provided facilitate the participation of the person served in programs and services?
2. If the accommodation is in the nature of an auxiliary aid, what is the frequency of use?
3. What is the person's opinion on the type of accommodation or aid provided?
4. What recommendations can be made by the person and the program director for future accommodations of this type?
5. Evaluations will be kept in the files of the Organization's accessibility coordinator to provide a record of the effectiveness of accommodation made.

E. Implementation and Monitoring of Accommodations.

1. The final recommended accommodation will be given to the person making the request within thirty days.
2. Any repairs necessary for an auxiliary aid will be arranged by the involved program director and expeditiously performed.

F. Notice Requirements.

1. The Organization will make copies of its Accessibility Policy and Procedure available to Community Mental Health, the Board of Directors, employees, persons served, volunteers and interns.
2. Postings required at each business unit include:
 - i. Michigan Civil Rights Department. Poster.
 - ii. Equal Employment Opportunity Commission (EEOC) and Office of Federal Contract Compliance Programs "Equal Employment Opportunity Is the Law" Poster.

G. Recordkeeping.

The Organization will maintain all records in regard to its Accessibility Policy and Procedures which include but are not limited to the following:

1. A list of disability advocates and/or organizations consulted.
2. Minutes/Recommendations, including actions taken by:
 - i. Safety/Accessibility Committees
 - ii. Consumer Advisory Committees
3. Reasonable Accommodation Request Forms and resulting actions.
4. Evaluations of Reasonable Accommodations implemented.

H. Accessibility Goals:

Architectural FY 2021 –FY 2022

Arkay Inc. facilities will be architecturally accessible to all customers, visitors, and staff.

I. Factors to consider:

1. Wheelchair accessibility.
2. Accessibility Ramps
3. Parking Lot
4. Activity space seating.
5. Land drainage.

6. Review new building facility for a consumer driven coffee shop that is handicapped accessible.

ii. Current status:

1. All facilities have at least limited wheelchair accessibility.
2. Review land drainage issue at Unity behind picnic structure.
3. All facilities have sufficient parking. Parking lot had a few pot holes which have been corrected for safety. Parking lot yellow & blue lines need to be restored.
4. Problems with kitchen sink draining.
5. Internal doors (2) at Southgate appear to be difficult for wheelchairs.
6. Roof replacement should be reconsidered in 2023 for Unity.
7. Picnic area wood at Unity needs sealed.
8. Need picnic table(s) for outdoor activity space at Southgate.
9. Consumer bathrooms at Southgate should be considered for modernization.
10. Consider a shower at Unity for higher acuity level consumers' contingent on census. Census has decreased at Unity.

iii. Problems identified for FY 2020 & 2021:

1. Parking lot at Unity & Southgate location needs need to be inspected in the spring/summer and any new pot holes/damage to be corrected for safety.
2. Parking lot yellow & blue lines need to be re-painted at Southgate and Unity locations.
3. Roof at Unity should be monitored for new leaks; replacement will be re-accessed in 2023.
4. Review updating women's bathrooms at Southgate for handicapped accessibility within budget constraints.
5. Problems with kitchen sink draining.
6. Internal doors (2) at Southgate appear to be difficult for wheelchairs.
7. Building search for a consumer driven coffee shop in the Downriver area.
8. Crossings location lacks a mop sink for easier cleanup.
9. Need picnic table(s) for outdoor activity space at the Southgate location.
10. Consider a shower at Unity for higher acuity level consumers' contingent on census. Census has decreased at Unity which now indicates a lack of need.

iii. Actions to be taken in FY 2021 & FY 2022 to improve architectural access:

1. Ongoing search for new building for a consumer driven coffee shop.
2. Any new parking lot pot holes to be repaired in May / June 2021 at Southgate & Unity.
3. Parking lot yellow lines need to be re-painted at Southgate and Unity locations. May/June 2022.
4. Roof should be monitored for leaks at Unity. Replacement will be considered in 2023.
5. Review kitchen sink for removal at Southgate & Unity. If removed, add a garbage disposal for drainage issues.
6. Provide a solution for internal doors (2) at Southgate for wheelchairs mobility.
7. Modernization of Women's bathroom at Southgate. Make doorway handicapped accessible within budget constraints.
8. Mop sink will be added at crossings this year.
9. Seal the wood and spruce up the picnic area at Unity for consumer activity and drain the land behind it.
10. Add to our outdoor activity spaces at Southgate location.
11. Consider a shower at Unity for higher acuity level consumers' contingent on census. Census has decreased at Unity. There is not current need.

Plans to reduce architectural barriers to access in the coming year:	Target Date
Unity land drainage issue behind picnic structure will be reviewed.	October 2021
Review updating women's bathroom at Southgate for handicapped accessibility within budget constraints.	September 2022
Review kitchen sink for removal. If removed, add a garbage disposal for drainage issues at Southgate & Unity.	July 2021
Provide a solution for internal doors (2) at Southgate for wheelchairs mobility.	September 2022
Parking lot yellow & blue lines need to be re-painted at Southgate location.	May-June 2021
Parking lot pot holes to be repaired for Southgate & Unity locations.	May-June 2022
New building search for a consumer driven coffee house.	October 2021
Spruce up the picnic area at Unity for consumer activity.	October 2021
Roof at Unity should be monitored for new leaks; replacement will be re-accessed in 2023 & or sooner.	August 2021; August 2022
Mop sink at crossings to be reviewed if space is available.	October 2021
Need picnic table(s) for outdoor activity space at the Southgate location	July 2021

Environmental FY 2021 & FY 2022

Arkay Inc. eliminates environmental factors that reduce access to our services.

- i. **Factors to consider:**
 - 1. Internal inspections.
 - 2. External inspections.
 - 3. Electrical Outlets
 - 4. Barriers to access.
 - 5. HVAC
- ii. **Current status:**
 - 1. Arkay Inc. monitors workspaces for environmental issues that may present barriers for individuals.
 - 2. Every Arkay location is responsible for internal inspections, fire suppression equipment checks, first aid kits and infection control. These are monitored by the Health and Safety Committee.
 - 3. Arkay now has changing rooms at Taylor & Flat Rock locations.
 - 4. Individual Arkay locations address issues of safe external access, including snow removal in the winter & lawn cutting in summer in consultation with Building Director.
 - 5. Building search for a consumer driven coffee shop in the downriver area.
 - 6. Lack of in-house technology for consumers.
 - 7. Parking lot has staff controlling traffic during pick-ups & drop-offs at Southgate location.
 - 8. The hot water tank is currently located in the cold storage room.
 - 9. Arkay locations appear not to have CO2 detectors.

10. Ensure that all Arkay computers & other electronics have surge protectors to protect electrical devices from voltage spikes.
- iii. **Problems identified:**
1. Need to plant an outdoor garden so consumers can become part of the outdoor environment and nature.
 2. Expand technology to consumers. Have computers at each location available for consumers.
 3. Ensure that all Arkay computers are to use surge protectors for all electrical outlets.
 4. CO2 detectors should be installed at all locations.
 5. Barrier free building search for a consumer driven coffee shop.
 6. On windy days, the furnace pilot could blow out resulting in no hot water at the Southgate location.
- iv. **Actions to be taken for FY 2021 & FY 2022:**
1. Barrier free building search for a consumer driven coffee house in the Downriver area.
 2. External Inspections are to be done annually.
 3. Plant an outdoor garden at Unity for all consumers to be part of nature & the outdoor environment.
 4. Annual Consolidated Drill Schedule in place.
 5. Install CO2 Detectors at each location.
 6. IT will develop at least 1 new technology device and related training per program.
 7. IT will make computers accessible for consumers at each location.
 8. Add signs that post speed limit, one way signs, no standing signs, & speed bumps at Southgate location.
 9. Discuss possible relocation of the hot water tank and/or alternatives to the furnace pilot blowing out.

Plans to reduce environmental barriers to access in the coming year:	Target Date
Continue with inspections for each location.	Ongoing, Annually
Barrier free building search for a consumer driven coffee shop.	September-October 2021
Plant an outdoor garden at Unity location for all consumers to work & enjoy the outdoor environment.	May 2022
Install CO2 Detectors at each location.	October 2021
Consider flower garden at crossings location.	June 2021
Add a volleyball net or other sport equipment at the Southgate location.	June 2022
IT will develop at least 1 new device and related training at each program.	July 2022
IT will make computers accessible for consumers at each location.	October 2021
Add signs that post speed limit, one way signs, no standing signs, & speed bumps at the Southgate location.	October 2021
Consider relocation of the hot water tan and/or other alternative.	September 2021

Attitudinal FY 2021 & FY 2022

Arkay Inc. eliminates attitudinal barriers that reduce access to our services.

- i. **Factors to consider:**
 1. Creating a welcoming environment.
 2. Flexible environment.
 3. Reducing stigma in our community.
 4. Reducing stigma within Arkay.
 5. Team work.
- ii. **Current status:**
 1. Job Coaches are the front line of education regarding individuals with disabilities within the community. Morning welcoming is provided by the job coaches,
 2. At times, staff may have difficulty working as a team.
 3. Arkay may want to add “employee of the month” parking place.
 4. Programs are kept clean and friendly.
 5. Incentives have been added for job coach documentation. Need to review an incentive for the case managers.
 6. Management is flexible with staff for family and /or personal needs.
 7. Groups and individuals are in the community on a daily basis.
 8. Ongoing Training. Reschedule class in Gentle Teaching.
 9. Staff, parent, committee and director’s meetings ongoing
- iii. **Actions that will be taken in FY 2020 to improve attitudes:**
 1. Staff education and Training.
 2. Have a training on teamwork and customer service for all staff.
 3. Have staff meetings at each location on team working skills.
 4. Arkay to review adding an “employee of the month” parking place.
 5. Need to review an incentive for the case managers.
 6. Maintain a child friendly workplace and flexible schedules for our employees with family needs.
 7. Staff training at meetings and via dwctraining.org.
 8. Add additional training in Tie Downs & How to Transfer for job coaches.

Plans to reduce attitudinal barriers to access in the coming year:	Target Date
Expand training of job coaches to enable them to better represent our consumers in the community. i.e. gentle teaching, team work. Staff training at meetings and via dwctraining.org.	Ongoing at Staff Meetings
Continued staff training in creating a welcoming environment for all. i.e. team work, customer service, & diversity.	Ongoing at Staff Meetings
Need to review an incentive for the case managers based on chart quality.	October 2021 March 2022
Gentle Teaching training mandatory for all One on One staff and offered to all staff.	September 2021 September 2022
Add additional training in Tie Downs & How to Transfer for job coaches.	September 2021 September 2022

Arkay to review adding an “employee of the month” parking place.	October 2021
Maintain a flexible schedule with employees and a child friendly work environment for our employees especially needed for the pandemic time.	Ongoing
Conduct one training on teamwork and customer service this plan year.	September 2021 September 2022

Financial FY 2021 & FY 2022

Arkay Inc. will minimize, as a good steward, financial barriers in accessing services.

- i. **Factors to consider:**
 1. High Cost of Health Insurance for staff.
 2. Funding cuts from Mental Health Authorities (MHA).
 3. Review banking rates.
 4. Creating better purchasing practices company wide.
 5. Setting Fund Raising Goals.
 6. Pandemic decrease in revenue & decrease in consumers.
- ii. **Current status:**
 1. Lean Principles practiced – strong reserves in place.
 2. Annual review of Arkay internal controls with Auditor to see if additional improvements are needed.
 3. Banks are providing very low interest rates for savings & CDs.
 4. Overtime needs to be reviewed & controlled even with new parameters.
 5. Greater employee participation for Comerica type activities. Job coaches have signed off on new job description for this purpose. Review method that each employee is to work a minimum of one shift.
 6. Assess the need for a major fundraiser (s) for Arkay to increase revenue.
 7. Review the feasibility of using reserves to establish a Consumer driven coffee house.
 8. Need to build relationships for a major sponsor for Arkay.
 9. Pandemic decreases Arkay’s revenue & consumers. A paradigm shift was created to include & expand virtual services
- iii. **Problems:**
 1. Proposed reductions in Medicaid. Possibility of state & MHA ’s reducing funding for services.
 2. Review Arkay internal controls policy with outside Auditor to see if additional improvements are needed.
 3. The current “process approval” for overtime has been revised and is to be continued in FY 2020. Provide a status if policy is working on overtime reduction and /or equitable distribution.
 4. Greater employee participation for Comerica type activities. Job coaches have signed off on new job description for this purpose. Review methods of one shift requirements.
 5. Banking rates need to be reviewed for better performance.
 6. Need to expand in resource development. Assess the need for a major fundraiser (s) for Arkay to increase revenue.
 7. Need to build relationships for a major sponsor for Arkay.
 8. Need to expand virtual services
 9. Need to expand grant research & application.
- iv. **Actions to be taken to reduce financial barriers to access:**
 1. Go out for bid to compare New Health Insurance Plans & cost.

2. Fund raising goals set for individual program as well as company-wide.
3. Banking rates need to be reviewed for better performance.
4. Review Arkay internal controls policy with outside Auditor to see if additional improvements are needed. Policy should include overtime controls. See #3.
5. Arkay now uses an estimated & actual overtime approval process. Provide a status if policy is working on overtime reduction and /or equitable distribution among staff.
6. Greater employee participation for Comerica type activities. Job coaches have signed off on new job description for this purpose. Review method that each employee is to work a minimum of one shift.
7. Create a resource development committee to meet monthly and/or more often if necessary. Add three new fundraisers. Further assess the need for a major fundraiser (s) for Arkay to increase revenue such as a golf outing and /or a silent auction.
8. Need to build relationships for a major sponsor for Arkay. This can be done via a golf outing or a silent auction.
9. Twenty grant applications were applied for & four grants were received.

Plans to reduce financial barriers to access in the coming year:	Target Date
Bid process for Health Insurance Carrier.	March 2021 March 2022
Develop fundraising goals for each program.	July 2021 July 2022
Major Agency Fundraiser is to be established for Summer 2020 or sooner. (Golf outing)	November 2021
Banking rates need to be reviewed for better performance.	September 2021 September 2022
Build relationships for a major sponsor(s) for Arkay. This can be coordinated with a golf outing and/or silent auction.	November 2021 – ongoing
Review Arkay internal controls policy with outside Auditor to see if additional improvements are needed and/or greater and equitable controls can be implemented in regards to overtime.	February 2021
Arkay now uses an estimated & actual overtime approval process. Also, job descriptions have been revised & signed by job coaches for additional work. Staffing & overtime have been reduced due the pandemic. After the pandemic, overtime will need to be reviewed again to see if reduction & distribution is equitable among staff.	September 2022
Greater employee participation for Comerica type activities. Job coaches have signed off on new job description for this purpose. Review method that each employee is to work a minimum of one shift. This is contingent if there will be a baseball season due to the pandemic.	March 2021 March 2022

Advocate for increased funding at the local and state levels.	Ongoing
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Employment FY 2021 & FY 2022

Arkay Inc. will provide a diverse and competent staff to assist consumers to meet their “Dreams”.

- i. **Factors to consider:**
 - 1. Diversity of staff.
 - 2. Employee incentive plan.
 - 3. Recruitment of Staff.
 - 4. VCE (dwctraining.org) Trained Staff.
 - 5. Wages
 - 6. The new HCBS Rules.
 - 7. Consumer integrated employment.
 - 8. Appropriate educational background for positions.
 - 9. Ongoing training of staff.
- ii. **Current status:**
 - 1. Human Resource Specialist monitors employee diversity.
 - 2. All staff must meet minimal training requirement per our funding agencies.
 - 3. Staff have been trained in HCBS new rules.
 - 4. Recruitment of staff & staff turnover.
 - 5. Job Coach starting wages were increased in FY 2020. Continue to review.
 - 6. Job Descriptions Review annually.
 - 7. Develop innovative & integrated supported employment for consumers.
 - 8. Current Incentive Plan
- iii. **Problem identified:**
 - 1. Staff turnover & recruitment methodology. Recruitment methodology should be reviewed and updated. Reduction of staff was due to the pandemic.
 - 2. Consider adding a position of Associate Director.
 - 3. Review and update job descriptions annually.
 - 4. Job Coach starting wages will be reviewed.
 - 5. The new HCBS rules stress external integrated employment for our consumers. Partner or build relationships with local businesses to ensure that our consumers can obtain quality employment from external sources.
 - 6. For integrated supportive employment, Arkay is to review coffee house methodology to create innovated integrated employment with our consumers.
 - 7. Arkay has consumers that currently work within Arkay. Transition plan needs to be created by Arkay Business Developers to ensure that new rules are followed.
 - 8. Incentive plan has been updated and continues to need to be reviewed to ensure that it is actually working to retain staff and improve accuracy.
- iv. **Actions to be taken in FY 2021 & 2022 to improve employment:**
 - 1. Review staffing needs especially when pandemic issues decline & create new methodology for recruitment.
 - 2. Consider adding a position of Associate Director for special projects & other administrative task.
 - 3. Job descriptions need to be reviewed annually.
 - 4. Review job coaches starting wage.

5. The new HCBS rules stress external integrated employment for our consumers. Partner or build relationships with local businesses to ensure that our consumers can obtain quality employment from external sources.
6. Arkay is to work on a transition plan for integrated supportive employment for consumers who are working within Arkay.
7. For integrated supportive employment, Arkay is to review coffee house methodology to create innovated integrated employment program for our consumers.
8. Review a new incentive plan to ensure that it is actually working to retain staff and improve accuracy.

Plans to reduce employment barriers to access in the coming years:	Target Date
Continue with proper staff training as required. Add new staff training as needed.	Ongoing
Review staffing needs & create new methodology for recruitment especially for job coaches.	September 2021 September 2022
Consider adding a position of Associate Director for special projects & other administrative task.	September 2021
Job descriptions need to be reviewed annually.	May 2021 May 2022
Review job coaches starting wage in the current pandemic environment of revenue decreases.	October 2021
Partner or build relationships with local businesses to ensure that our consumers can obtain quality employment from external sources. (new HCBS rules)	Ongoing
Arkay is to work on a transition plan for integrated supportive employment for consumers who are working within Arkay.	November 2021
For integrated supportive employment, Arkay is to review coffee house methodology to create innovated integrated employment program for our consumers	October – December of 2021
Review incentive plan after pandemic to ensure that it is actually working to retain staff and improve accuracy of files.	Ongoing, quarterly.

Communication FY 2021 & FY 2022

Arkay Inc. will address communication barriers that prevent access to services.

- i. **Factors to consider:**
 1. Language – Sign for Deaf / Hard of Hearing.
 2. TDD Phone Services.
 3. Having access to translators.
 4. Digitalization of documents.
 5. Revision & update to Web Site for all Arkay Programs
 6. Monthly program newsletter(s) are on website for program communications.

- ii. **Current status:**
 1. Arkay provides brochures and intake documents in English, Spanish, Arabic and Braille. Arkay will update brochures as needed.
 2. Arkay has TDD phone service.
 3. Digitalize written communications.
 4. Have staff available who knows sign language.
 5. Have staff who know Spanish, Italian, and Arabic languages.
 6. Have a consumer who is deaf / hard of hearing.
- iii. **Problem identified:**
 1. Paper copies of documents historically get lost or misplaced. Digitalization of documents i.e. all employment related forms.
 2. Revisions & updates are to be to on website.
 3. Have consumer who is deaf / hard of hearing.
 4. Need translator pool for all languages except English, Spanish, sign language, and Arabic. Arkay has partnered with an organization for this purpose.
- iv. **Actions to be taken in FY 2021 to FY2022 to eliminate communication barriers:**
 1. Display Mission Statement in English, Spanish and Arabic in all programs.
 2. MiArkay.org website to be revised and updated monthly
 3. Review adding another assistive telephone device.
 4. Continue to participate in a translator pool for languages our staff do not speak.

Plans to reduce communication barriers to access in the coming years:	Target Date
Continue to translate materials into primary language groups, including non-readers. Arkay will update brochures and intake documents into English, Spanish, Arabic and Braille.	November 2021 Ongoing
Improve Customer Service Technology by including various forms and tools on the website.	Ongoing Review monthly
Continue to add newsletters on the website & update website.	Ongoing, monthly
News & events are to be added monthly to website.	Ongoing, monthly
Arkay added a TDD line for the deaf & hearing impaired. Review the need in adding an assistive device to our phone system for those hard of hearing.	January 2022
Find translator services that can be used "as needed". Note: Arkay has added Deaf, Spanish, & Arabic translators. Further Arkay has added a hearing impaired staff to work in human resources.	Ongoing

Transportation FY 2021 & FY 2022

Arkay Inc. services will be accessible to the individuals seeking services.

- i. **Factors to consider:**
 1. Provide adequate vans or buses for all programs.
 2. Rotate vehicles between programs so vehicles do not get the same wear & tear.
 3. Staff travel.
 4. Access to bus routes and main thoroughfares. Develop a bus route to prevent duplicate driving and unnecessary travel.
 5. Maintaining safe and dependable vehicles for Arkay.

6. Safe driving in-service.
 7. Accessible vans for transportation and community inclusion.
 8. Staff use of personal vehicles – must meet safety standards.
- ii. **Current status:**
1. Arkay currently maintains a fleet of 28 vehicles.
 2. Ensure safety standards are met for using personal vehicles. In-service training on safe driving.
 3. Vehicle maintenance is part of the evaluation process.
 4. Staff travel-ensure staff carpooling to avoid duplication.
 5. Routes are to be reviewed to prevent duplication.
 5. Utilize local communities' transportation.
 6. Utilize family and homes for transportation.
 7. Need to rotate vehicles among programs.
- iii. **Problem identified:**
1. Wear & tear on vehicles.
 2. Prior to the pandemic, there was a lack of consumer space on current vehicles to add new consumers on routes. Invest in more vehicles after the pandemic when consumer census increases & the need arises. Consider wheelchair needs.
 3. Safe driving in-service training for staff.
 4. Increase staff carpooling.
 5. Rerouting vehicles to avoid duplication of travel.
 6. Evaluations of job coaches are to be used to discuss safe driving.
 7. Ensure safety standards are being met.
 8. Gas Prices.
 9. Maintenance of Vehicles.
- iv. **Actions to be taken in FY 2021 & FY 2022 to improve transportation:**
1. Sharing of routes and vehicles among programs. (Rotation)
 2. Reducing distance of community-based outings.
 3. Provide an in-service training to staff on safe driving.
 4. Staff travel-ensure staff carpooling to avoid duplication.
 5. Add 2 vehicles if needed after the pandemic to increase transportation fleet. Consider wheelchair needs.
 6. Develop a system of bus routing to prevent duplication & unnecessary travel.
 7. Provide a regular maintenance schedule to ensure longevity of vehicles.
 8. Address vehicle maintenance during the employee's annual evaluation.

Plans to reduce transportation barriers to access in the coming year:	Target Date
Sharing of routes & vehicles among programs.	Ongoing
Staff travel: ensure staff carpooling to avoid duplication.	March 2021 /Ongoing
Update the bus routing system for all programs to prevent unnecessary travel and gasoline expense.	Ongoing December 2021
Prior to the pandemic, there was a lack of consumer space on current vehicles to add new consumers on routes. Invest in vehicles if needed. Consider wheelchair needs.	December 2021 June 2022

Provide an in-service training to staff on safe driving.	Annually (or more often if needed.)
Consider new options for transportation. i.e. providing transportation as a service to the community.	July 2021 September 2021 September 2022
Provide a regular maintenance schedule to ensure longevity of vehicles. (SharePoint)	Ongoing
Address vehicle maintenance during the annual employee evaluation. Endorse &/or correct behaviors as necessary.	October 2021 Ongoing
Provide written transportation maintenance schedule(s) by month to ensure longevity of vehicles,	December 2021

VII. References:

- A. ADA Americans with Disabilities Act of 1990 including changes made by ADA Amendment Act of 2008.
- B. Michigan Persons with Disabilities Civil Rights Act, No. 220 of 1976 as amended 1990.
- C. Access and Use of Facilities by Physically Limited Persons, Public Act 1 of 1966, as amended through 1985.
- D. Accessibility: Commission on Accreditation of Rehabilitation Facilities.
- E. Department of Labor, Construction Code Commission, General Rules. Part 4, Building Code Rules.
- F. Graphic Illustrations of Michigan Construction Code Commission "General Rules" Applicable to Making Facilities Accessible for Use of the Physically Handicapped, Robert A. L. Williams, for the Michigan Center for a Barrier Free environment, April 1980.
- G. <http://www.access-board.gov/adaag/checklist.html>
- H. www.ada.gov (ADA Home Page)
- I. www.Michigan.gov (Disability Resources)
- J. 2011 CARF Standards
- K. www.eeoc.gov (Equal Employment Opportunity Commission Home Page)
- L. 2010 ADA Standards effective March 15, 2012
 - 1. Applicable Statute or Standards:
 - 2. Section 504, Rehabilitation Act of 1973, as amended. Accessibility Policy and Procedures Page 11 of 11
 - 3. Access Information Bulletin, Architectural Barriers and People with Mental Retardation, 1981 National Center for a Barrier Free Environment.
 - 4. American National Standard ANSI A117.1 (1980), Specifications for Making Building and Facilities Accessible to, and Usable by, the Physically Handicapped (not compulsory in Michigan but excellent source of standards).
 - 5. Access Information Bulletin, ANSI A117.1 (1980), Survey/Checklist, 1981 National Center for a Barrier Free Environment.
 - 6. The Architectural Barriers Act of 1968, Public Law 90-480 (Refers to accessibility of federal buildings).

VIII. Applicable Forms:

- A. Accommodation Request Form.
- B. Accommodation Response Form.

C. Self-Assessment Overview.

D. Policy & Procedures: Accessibility Policy and Procedures. Category: Health and Safety

Policy and Procedure: Accessibility Plan	
Category: Accessibility	Document: 4900
Section: 4000	
Original Date of Issue (mo/day/year): 01//5/2012	
Revision Dates (mo/day/year): revised and re-numbered on: 07/12/2012, 7/11/2013, 7/10/2014, 6/15/2015, 06/14/2016, 4/20/2017, 4/18/2018, 6/13/2018, 6/13/2019, 6/12/2020, 1/27/2021 Reviewed: 07/12/2012, 7/11/2013, 7/10/2014, 6/15/2015, 06/14/2016, 4/20/2017, 4/18/2018, 6/13/2018, 5/1/19, 2/20/2020, 1/27/2021	
Approved by the Board (mo/day/year): 05/03/2012; 7/26/2018; 1/28/2021	

Plans to reduce architectural barriers to access in the coming year:	Target Date

Plans to reduce environmental barriers to access in the coming year:	Target Date

Plans to reduce attitudinal barriers to access in the coming year:	Target Date

Plans to reduce financial barriers to access in the coming year:	Target Date

Plans to reduce employment barriers to access in the coming year:	Target Date

Plans to reduce communication barriers to access in the coming year:	Target Date

Plans to reduce transportation barriers to access in the coming year:	Target Date

Plans to reduce architectural barriers to access in the coming year:	Target Date

Plans to reduce environmental barriers to access in the coming year:	Target Date

Plans to reduce attitudinal barriers to access in the coming year:	Target Date

Plans to reduce financial barriers to access in the coming year:	Target Date

Plans to reduce employment barriers to access in the coming year:	Target Date

Plans to reduce communication barriers to access in the coming year:	Target Date

Plans to reduce transportation barriers to access in the coming year:	Target Date

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