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



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# ARKAY ACCESSABILITY PLAN

## FY 2024 TO FY 2025

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Accessibility



NOVEMBER 7, 2023

ARKAY, INC.

15221 Eureka Rd. Southgate, MI 48195

**Accessibility Plan  
FY 2024-FY2025**

**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 Integrated Health Network (DWIHN) or through another Mental Health Authority to provide mental health &/or developmental disability services in Wayne, Oakland, Macomb, & 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 Chief Executive Officer (CEO) 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 may appoint an assistant as a backup accessibility coordinator.

The Quality Management Committee 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 (Director of Building & Transportation):**

1. Monitor and facilitate the Organization's compliance with applicable regulatory statues, Policies and Procedures as they relate to accessibility with the Commission on Accreditation of Rehabilitation Facilities (CARF) Standards.
2. Disseminate information to our Organization's CEO, management, employees, volunteers, interns and persons served.
3. Facilitate the recruitment of qualified persons served for employees and volunteers.
4. The Program Director for each program 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, 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 to ensure consumer input into the Organization's Accessibility Plan/Report.
7. The Health & Safety/Accessibility Committee shall meet no less than quarterly and review accessibility. Recommendations shall be submitted to the Accessibility Coordinator and 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 CEO informed of the Organization's compliance with the Accessibility Policy and Procedures.
10. Submit an Annual Accessibility Report/Plan to the CEO 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 CEO 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 CEO 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 CEO, the accessibility coordinator, the involved program director, and the person requesting the accommodation.

4. Should the CEO'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 Mental Health Authority (MHA). If additional assistance is not available through the 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 to 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 2024-FY 2025**

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

**I. Factors to consider:**

1. Led Lighting.
2. Signage and Marquees.
3. Parking Lot sealing.

4. Floor care.
5. Land drainage, picnic structure and shed.
6. Unity Roof Review.
7. Poarch step at Southgate Crossing.
8. Review new buildings & a 2<sup>nd</sup> consumer driven coffee shops that is handicapped accessible.
9. Magnetic door locks.
10. Parking lot cameras.

**ii. Current status:**

1. All facilities still use mostly florescent lighting.
2. Review signage and marquees for improvements.
3. All facilities have sufficient parking. Parking lot had a few potholes which have been corrected for safety. Parking lot yellow & blue lines need to be restored at Unity.
4. Floors have been recently buffed and refinished. This needs to reviewed quarterly.
5. Picnic area has flooding issues
6. Roof replacement should be reconsidered in 2024 for Unity contingent on future planning.
7. Poarch step needs replacing at Southgate Crossings (admin.)
8. Search for 2<sup>nd</sup> coffee shop building to begin in 2024 based on population data.
9. Magnetic door locks were purchased but not yet installed.
10. Arkay is utilizing parking lot cameras.

**iii. Problems identified for FY 2024-FY 2025-:**

1. Fluorescent lighting is costly vs led lighting.
2. Signage is faded at Flat Rock Unity and Southgate Crossings; marquee is damaged at Crossing facility.
3. Weeds are growing in cracks in parking lot and it needs to be seal coated.
4. A plan is needed to keep up with the floors and keeps them looking nice.
5. The picnic area at Unity is unused due to flooding and insects.
6. Roof is old at Unity but not currently leaking.
7. Poarch step is deteriorating at Southgate Admin.
8. Building will be needed for a 2<sup>nd</sup> coffee shop in the future.
9. Planning and assistance is likely needed to install magnetic locks.

**iii. Actions to be taken in FY 2024 –FY 2025 to improve architectural access:**

1. Upgrade lighting to led and leverage incentive programs where available.
2. New signage to be purchased and marquee to be considered for upgrading at Crossings.
3. Obtain quotes and get seal coat for parking lot.
4. Floors to be buffed quarterly at Unity & Crossings.
5. Review demolition vs rehabilitation of picnic structure at Unity.
6. Continue to monitor roof at Unity for leaks and consider replacement in 2025 if needed.
7. Step will be repaired or replaced at Southgate Admin.
8. Target area searches to begin for 2<sup>nd</sup> coffee shop location based on population data.
9. Magnetic door locks will be installed at Flat Rock Unity.
10. Consider adding more parking lot cameras at Crossings Southgate.

**Responsible Party: Director of Transportation & Building, Special Projects Director, Quality Director, Controller, Business Development Director.**

<b>Plans to reduce architectural barriers to access in the coming year :</b>	<b>Target Date</b>
Upgrade lighting to led at Southgate.	July 2024
Fix and upgrade signage at Southgate.	September 2024
Seal coat parking lots.	October 2024
Buff floors quarterly.	Quarterly

Review picnic structure for demolition or rehabilitation.	October 2024
Monitor roof for leaks at Unity.	August 2024, August 2025 (Ongoing)
Step to be replaced at Southgate Crossings.	September 2024
Search for 2 <sup>nd</sup> consumer driven coffee shop.	Ongoing for FY 25- FY 26
Magnetic locks to be installed.	June 2024
Consider adding more cameras in Southgate parking lot.	March 2025

### **Environmental FY 2024-FY 2025**

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.
  6. Waste Management.
  7. Lighting.
  8. Circuit Breaker Issue.
  9. Use of extension cords.
- ii. **Current status:**
  1. Arkay Inc. monitors workspaces for environmental issues that may present barriers for individuals.
  2. Outdoor garden was established so Consumers can be involved in nature & part of the environment.
  3. 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.
  4. Arkay now has a changing room at Flat Rock location.
  5. Individual Arkay locations address issues of safe external access, including snow removal in the winter & lawn cutting in the summer in consultation with Building Director.
  6. Building search is ongoing for a consumer driven coffee shop for FY26 in a strategic area.
  7. Lack of in-house technology for consumers.
  8. Parking lot has staff controlling traffic during pick-ups & drop-offs at Southgate location.
  9. All Arkay locations have both CO2 and smoke detectors for health & safety.
  10. Ensure that all Arkay computers & other electronics have surge protectors to protect electrical devices from voltage spikes.
- iii. **Problems identified:**
  1. Need to maintain an outdoor garden so consumers can become part of the outdoor environment and nature.
  2. Expand technology to consumers. Have more computers at each location available for consumers for skill building & supported employment.
  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. Unity and Crossings locations use fluorescent lighting which is costly vs led lighting.
  6. Need 2 additional cans for waste disposal at Crossings location.
  7. Extension cord usage.



iv. **Actions to be taken for FY 2024-FY 2025:**

1. External Inspections are to be done annually.
2. Plant an outdoor garden at Unity and Crossings for consumers to be part of nature & the outdoor environment.
3. Maintain Annual Consolidated Drill Schedule in place.
4. Install CO2 and smoke Detectors at all locations as needed.
5. IT will develop at least 1 new technology device for consumer use at each location.
6. IT will ensure computers accessible for consumers at each location.
7. Provide a cost benefit analysis on upgrading lighting.
8. Add 2 cans for waste disposal at Crossing location.
9. Consider adding electric receptacles in the office area of Crossings to eliminate the use of extension cords.
10. Consider adding an additional circuit in front offices at Crossings

**Responsible Party: Director of Transportation & Building, Special Projects Director, Human Resources, IT Manager**

<b>Plans to reduce environmental barriers to access in the coming years.</b>	<b>Target Date</b>
Continue with inspections for each location.	Ongoing, Annually
Barrier free building search for a consumer driven coffee shop.	Ongoing
Maintain the outdoor garden at Unity and Crossings locations for all consumers to work & enjoy the outdoor environment.	May 2024. May 2025
Install CO2 and smoke Detectors at each location as needed	As needed
Consider flower garden at crossings location.	May-June 2024-2025
IT will develop at least 1 new device for consumer use at each program.	September 2024
IT will ensure computers are accessible for consumers at each location.	Ongoing
Provide a cost benefit analysis on upgrading lighting to led lighting.	July 2024 July 2025
Add 2 trash cans at the Crossings location	Ongoing
Consider adding electric receptacles in the office area of Crossings to eliminate the use of extension cords.	January 2025
Consider adding an additional circuit in front offices at Crossings.	January 2025

**Attitudinal FY 2024-FY 2025**

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. Teamwork.
- 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 in a team management model.
  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 has been provided at monthly meetings. Reschedule class in Gentle Teaching and/or similar class.
  9. Continue with staff, parent, risk management, health & safety, quality and director’s meetings ongoing.
- iii. **Actions that will be taken in FY 2024-FY 2025 to improve attitudes:**
  1. Staff education and training on reducing stigma.
  2. Provide 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 a data incentive for the case managers.
  6. Maintain a family friendly workplace and flexible schedules for our employees with family needs.
  7. Staff training at meetings and via [www.dwctraining.com](http://www.dwctraining.com) .
  8. Add additional training as needed for job coaches.
  9. Arkay will improve technology across the organization.

**Responsible Party: Quality Director, Program Director(s), Director of Transportation, CEO, Business Development Director, Administrative Assistant, Controller**

<b>Plans to reduce attitudinal barriers to access in the coming years:</b>	<b>Target Date</b>
Expand training of job coaches to enable them to better represent our consumers in the community. i.e., gentle teaching, teamwork. Staff training at meetings and via <a href="http://dwctraining.org">dwctraining.org</a> .	Ongoing at Staff Meetings
Continued staff training in creating a welcoming environment for all. i.e., teamwork, customer service, & diversity.	Ongoing at Staff Meetings
Train management employees in the area of collective leadership	Ongoing
Train management employees in the area of leadership and the differences between leading and managing.	January 2024 January 2023
Need to review “data” incentive for the case managers based on chart quality.	Ongoing
Gentle Teaching/working with people training mandatory for all staff	Ongoing
Add additional training for employees on attitude .Provide training at monthly management meetings on leadership & managing risk.	Ongoing As needed
Improve technology organization wide.	Ongoing as needed

Maintain a flexible schedule with employees and a child friendly work environment for our employees especially needed for the pandemic time.	Ongoing
Conduct a training on teamwork and customer service for all Staff	September 2024 September 2025

**Responsible Party: CEO, Human Resource Officer, Director of Transportation & Building, Quality Director, IT Manager, Special Projects Director**

### **Financial FY 2024-FY 2025**

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

- i. **Factors to consider:**
  1. High Cost of Health Insurance for employer & staff.
  2. Funding decreases ~~cuts~~ from Mental Health Authorities (MHA).
  3. Review banking rates for CDs, Money Market Funds, & Government Bonds.
  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 were providing very low interest rates for savings & CDs. This appears to be changing due to high inflation which can be new opportunity.
  4. Overtime needs to be reviewed & controlled with new parameters.
  5. Reestablish Comerica supported employment from post pandemic. Increase 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. Consider expanding the Flee Market Sales.
  7. Begin operations of Java Junction Coffee Shop in Trenton, Michigan to expand consumer supportive employment. Review the feasibility of using reserves to establish another Consumer driven coffee house in a targeted area of Wayne County.
  8. Need to build relationships for a major sponsor for Arkay.
  9. Pandemic has decrease Arkay’s consumer count. A paradigm shift was created to include & expand virtual services. Grant funds were received for this purpose; however, grant funds have been utilized. Skill building services are to move from virtual to community base.
- iii. **Problems:**
  1. Proposed reductions in Medicaid. Possibility of state & MHA ’s reducing funding for services.
  2. Review Arkay internal controls policy to see if additional improvements are needed in payroll processing.
  3. The current “process approval” for overtime has been revised and is to be continued in FY 2024. Provide a status if policy is working on overtime reduction and /or equitable distribution.
  4. Greater employee participation for Comerica & coffee shop 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. Consider expanding the Flee Market Sale.
  7. Need to build relationships for a major sponsor for Arkay.
  8. Staffing shortages for Direct Care Workers need to be addressed with incentives.
  9. Need to expand supportive employment services.

10. Need to expand grant research & application.
- iv. **Actions to be taken in FY 2024-FY 2025 to reduce financial barriers to access:**
1. Go out for bid for additional auto mechanic work to ensure competitive pricing.
  2. Set fund raising goals for individual programs as well as company-wide.
  3. Banking rates need to be reviewed for better performance for CDs, Money Market funds, & Government Bonds.
  4. Review Arkay internal controls policy to see if additional improvements are needed. Policy should include overtime controls, consumer funds, & payroll auditing.
  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 & Java Junction Coffee Shop activities to expand supported employment. Job coaches have signed off on new job description for this purpose.
  7. Maintain and expand resource development committee to meet monthly. 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.
  9. Utilize a staff incentive for referring new potential staff after 90 days of employment.
  10. Review post pandemic staffing needs & utilize creative methods for hiring.
  11. Review grant applications to expand revenue.
  12. Arkay to host flea markets at its locations on a semiannual basis.

**Responsible Party: CEO, Controller, Administrative Assistant, Program Director(s), Quality Director**

<b>Plans to reduce financial barriers to access in the coming years.:</b>	<b>Target Date</b>
Develop fundraising goals for each program.	January 2024
Major Agency Fundraiser is to be established for Summer 2024 or sooner. Consider enhancing flea market sales.	July 2024
Banking interest rates need to be reviewed for better performance.	Monthly
Build relationships for a major sponsor(s) for Arkay. This can be coordinated with an established vendor.	Ongoing
Review Staff incentive for referring new potential employees after 90 days,	Quarterly
Annually review Arkay internal controls policy to see if additional improvements are needed and/or greater and equitable controls can be implemented in regard to overtime and consumer funds. Consider auditing of payroll.	Annually
Greater employee participation for Comerica & Java Junction Coffee Shop activities to expand supported employment. Job coaches have signed off on new job description for this purpose.	January 2024 January 2025
Arkay now uses an estimated & actual overtime approval process. Also, job descriptions have been revised & signed by job coaches for additional work. Overtime will need to be reviewed again to see if reduction & distribution is equitable among staff. Consider innovative ways to hire DCW staffing.	Ongoing, monthly
Host flea market for resource development.	May, September 2024 & 2025
Advocate for increased funding at the local and state levels.	Ongoing

## Employment FY 2024-FY 2025

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 ([www.dwctraining.com](http://www.dwctraining.com)) trained staff.
  5. Implementation of the new HCBS Rules.
  6. Consumer integrated employment.
  7. Ensure appropriate educational background for positions.
  8. Ongoing training of staff.
- ii. **Current status:**
  1. Human Resource Officer monitors employee training & diversity.
  2. All staff must meet minimal training requirements per our funding agencies.
  3. Staff have been trained in HCBS new rules.
  4. Expand recruitment of staff & reduce staff turnover.
  5. Job Coach starting wages were increased in FY 2023. Continue to review in FY 2024. & 25.
  6. Job Descriptions are reviewed-annually.
  7. Develop innovative & integrated supported employment for consumers.
  8. Incentive Plan to be used for staffing.
- iii. **Problem identified:**
  1. Staff turnover & recruitment methodology. Recruitment methodology should be reviewed and updated to enhance Arkay staffing needs.
  2. Special projects added.
  3. Review and update job descriptions annually.
  4. Job Coach starting wages have been updated and 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 Java Junction Coffee Shop supportive employment for consumers.
  8. Incentive plan needs to be reviewed for data needs.
- iv. **Actions to be taken in FY 2024-FY 2025 to improve employment:**
  1. Review staffing needs & create new methodology for recruitment.
  2. Job descriptions are to be reviewed annually.
  3. Review job coaches starting wage.
  4. The new HCBS rules stress external integrated employment for our consumers. Java Junction Coffee Shop will be a method utilized to expand supported employment.
  5. Continue to 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 can be trained to work at Java Junction.
  7. For integrated supportive employment, Arkay is to begin future planning for another coffee house methodology to create innovated integrated employment program for our consumers.
  8. Create a new incentive plan to ensure that it is actually working to retain staff and improve accuracy.

**Responsible Party: Human Resource Officer, CEO, Controller, Quality Director, Business Development Director, Special Projects Director**

<b>Plans to reduce employment barriers to access in the coming years.</b>	<b>Target Date</b>
Continue to review proper staff training as required. Add new staff training as needed.	Monthly
Review staffing needs & create new methodology for recruitment especially for job coaches.	January 2024
Review staff incentive for meeting metrics i.e. customer service, data requirements, vehicle driving skills, innovation, & other.	March 2024, Annually
Job descriptions are to be reviewed annually.	Annually
Review job coaches starting wage.	Annually
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 can be trained to work at Java Junction.	Ongoing
For integrated supportive employment, Arkay is to review opening a second coffee house to create additional innovated integrated employment program for our consumers.	Ongoing / September 2024  September 2025
Review data incentive plan to ensure staff retention and improve accuracy of files.	Ongoing, monthly

### **Communication FY 2024-FY2025**

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. Translation of agency brochures into Spanish, Arabic, & Braille
  5. Digitalization of documents.
  6. Revision & update to Web Site for all Arkay Programs
  7. Monthly program newsletter(s) are on website for program communications.
- ii. **Current status:**
  1. Arkay provides brochures and intake documents in English & Spanish.
  2. Arkay will update brochures as needed to include new services and coffee shop.
  3. Arkay has TDD phone service.
  4. Arkay has digitalized most written communications.
  5. Have staff available who knows sign language.
  6. Have staff available who know Spanish, Italian, and Arabic languages.
- iii. **Problem identified:**
  1. Ensure all updates are on the website.
  2. New services & coffee shop are to be expanded on the website & on all written materials including the Arkay display,
  3. Need translator pool for all languages except English, Spanish, sign language, and Arabic. Arkay has partnered with an organization for this purpose.
  4. Consider enhancing current phone system to bring it up to date.
- iv. **Actions to be taken in FY 2024-FY 2025 to eliminate communication barriers:**
  1. Continue to Display Mission Statement in English, Spanish and Arabic in all programs.

2. MiArkay.org website will continue to be revised and updated monthly
3. Review replacing current phone system.
4. Continue to participate in a translator pool for languages our staff do not speak.

**Responsible Party: Program Director, Human Resource Officer, Quality Director, IT Manager, Special Projects Director. Business Development Director**

<b>Plans to reduce communication barriers to access in the coming years.</b>	<b>Target Date</b>
Continue to translate materials into primary language groups, including non-readers. Arkay will print brochures and intake documents into English, Spanish, Arabic and Braille.	Ongoing
Improve Customer Service Technology by including various forms and tools on the website.	Ongoing Review monthly
Continue to add newsletters and documents to the website & update website monthly	Ongoing, monthly
News & events are to be added monthly to website. New services & coffee shop are to be added on the website & all written materials including the Arkay display,	Ongoing, monthly
Continue to monitor the need for assistive technology & provide as needed.	As needed
Review phone systems and consider replacement within budget constraints.	September-2024 January 2025

### **Transportation FY 2024-FY 2025**

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. Pooling of 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. Provide safe driving in-service.
7. Ensure 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. For staff travel, ensure 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. Negligent vehicle accidents which increase overall cost. FY 2023 accident numbers have significantly increased. Arkay needs to identify careless driving among staff.
3. Safe driving in-service training needed 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. Increased gas prices with the political push to move to electric vehicles.
9. Increased maintenance of vehicles.
10. New vehicles need to have “how is my driving stickers?”.

iv. **Actions to be taken in FY 2024-FY 2025 to improve transportation:**

1. Continue 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. For staff travel, ensure staff carpooling to avoid duplication.
5. Add 2 vehicles if needed and within budget constraints to increase transportation fleet. Consider wheelchair needs.
6. Establish an accident prevention program perhaps with are auto insurance carrier. Arkay needs to identify careless driving among staff & prevent it.
7. Develop a system of bus routing to prevent duplication & unnecessary travel.
8. Provide a regular maintenance schedule to ensure longevity of vehicles.
9. Address vehicle maintenance during the employee’s annual evaluation.
10. Add stickers to all new vehicles

**Responsible Party: Director of Transportation & Building, Special Projects Director, IT Manager, Human Resource Officer**

<b>Plans to reduce transportation barriers to access in the coming years.</b>	<b>Target Date</b>
Review sharing of routes & vehicles among programs.	Ongoing, Monthly
Staff travel: ensure staff carpooling to avoid duplication.	Ongoing
Update the bus routing system for all programs to prevent unnecessary travel and gasoline expense. Review & combine routes for all programs.	Ongoing, March 2024
Invest in vehicles as needed. Consider wheelchair needs.	Ongoing as needed
Provide an in-service training to staff on safe driving.	Annually
Provide a regular maintenance schedule to ensure longevity of vehicles. (SharePoint)	Ongoing
Establish an accident prevention program perhaps with are auto insurance carrier. Arkay needs to identify careless driving among staff & prevent it. Add stickers to all new vehicles	January 2024 Review January 2025
Address vehicle maintenance during the annual employee evaluation. Endorse &/or correct behaviors as necessary. This is required by all supervisors.	Ongoing
Provide means for employees to directly report problems with vehicles so that repairs can be scheduled to ensure longevity of vehicles. This is to be provided to Director of Transportation for review & discussion at the Health & Safety Committee.	Ongoing Monthly



**NOTE: Arkay’s Health & Safety Committee reviews the Accessibility Plan: Ongoing**

**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](http://www.ada.gov) (ADA Home Page)
- I. [www.Michigan.gov](http://www.Michigan.gov) (Disability Resources)
- J. 2011 CARF Standards
- K. [www.eeoc.gov](http://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: <b>Accessibility Plan</b>	
Category: <b>Accessibility</b>	
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