



**STATE OF TENNESSEE
DEPARTMENT OF HEALTH
OFFICE OF HEALTH LICENSURE AND REGULATION
DIVISION OF HEALTH CARE FACILITIES
OFFICE FOR CIVIL RIGHTS COMPLIANCE
FIRST FLOOR, CORDELL HULL BUILDING
425 FIFTH AVENUE NORTH
NASHVILLE, TN 37247-0508
615-741-7300**

**SECTION 504
SELF-EVALUATION GUIDE
CHECKLIST**



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Section 504 Self-Evaluation Guide

Section 504 of the Rehabilitation Act of 1973 (Section 504) and its implementing regulation, 45 Code of Federal Regulations, Part 84, require that a self-evaluation be conducted by every recipient of Federal financial assistance through the Department of Health and Human Services.

This guide is provided by the Office for Civil Rights (OCR), HHS, to assist you in complying with this requirement.

Completion of Section C, "Program Accessibility", may not be required if the benefits and services provided by your facility are administered outside of a clinical setting. Those providers with 15 or fewer employees may also be exempt from providing the full range of physical accessibility standards in its facility.

Most Home Health Care Agencies, for example, provide all services outside of a clinical setting, in patients' homes. Section 504 does not require physical accessibility standards to apply universally in situations where services are provided exclusively outside of a clinical setting. Program accessibility is achieved by bringing the service to the beneficiary in the case of Home Health Care Agencies. In this instance, there would be no requirement that the facility's administrative office be physically accessible, other than to provide reasonable accommodation to meet the needs of handicapped employees (See Section B, "Employment").

If you provide services in a clinical setting, the building must be physically accessible to the handicapped. If a provider with fewer than 15 employees finds, after consultation with a handicapped person seeking its services, that there is no method of providing accessibility other than making a significant alteration to its existing facility, the provider may, as an alternative, refer the handicapped person to another provider of services that is accessible.

If you have questions regarding any of the questions contained herein, we urge you to contact OCRC for technical assistance, at (615) 741-7300.

Thank you for your cooperation.

Subpart A - General Provisions

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
<u>Assurance Form</u>				
1. Have you filed an assurance form with OCR (HEW-641) that you will not discriminate on the basis of handicap in employment and in the provision of services?	_____	_____	_____	_____
<u>Designation of Coordinator</u>				
2. If you employ fifteen or more persons, have you designated an employee to coordinate your 504 activities (Section 504 Coordinator)?	_____	_____	_____	_____
<u>Notice</u>				
3. Have you taken and continue to take measures to notify applicants for employment and services, employees, unions, or professional organizations with whom you have collective bargaining or professional agreements of your policy of nondiscrimination on the basis of handicap?	_____	_____	_____	_____
4. Have you notified the above mentioned groups of the name of your Section 504 Coordinator?	_____	_____	_____	_____
5. Did you take steps to ensure that the notice was equally available to persons with impaired vision or hearing?	_____	_____	_____	_____

Subpart A - General Provisions

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
6. Does the notice of nondiscrimination appear in your recruitment materials and publications, if you publish or use recruitment materials?	_____	_____	_____	_____
<u>Grievance Procedure</u>				
7. If you employ fifteen or more persons, have you adopted a due process grievance procedure for employees and for applicants and beneficiaries of your services?	_____	_____	_____	_____
<u>Record Keeping</u>				
8. Do you keep records to demonstrate your efforts to comply with the 504 Regulation?	_____	_____	_____	_____

Subpart B - Employment

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
1. Does your organization currently have a written statement of its policy of nondiscrimination?	_____	_____	_____	_____
2. Does this policy include an assurance of nondiscrimination in employment on the basis of handicap?	_____	_____	_____	_____
3. It is disseminated to:				
a. Employees, interviews, managers	_____	_____	_____	_____
b. General Public	_____	_____	_____	_____
c. Applicants	_____	_____	_____	_____
d. Recruitment, Employment Agencies	_____	_____	_____	_____
e. Providers or Administrators of fringe benefits	_____	_____	_____	_____
f. Providers of training and apprenticeship program	_____	_____	_____	_____
g. Labor unions	_____	_____	_____	_____
h. Professional associations with whom you have agreement	_____	_____	_____	_____
4. Did you take steps to ensure that notice regarding your policy of nondiscrimination in employment was equally available to persons with impaired vision or hearing?	_____	_____	_____	_____
5. Are your recruitment sites accessible to persons with mobility impairments?	_____	_____	_____	_____

Subpart B - Employment

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
6. Do you provide notice to potential applicants that your institution does not discriminate against handicapped persons?	_____	_____	_____	_____
7. Have you established contact with rehabilitation agencies and facilities from whom you recruit or seek advice?	_____	_____	_____	_____
8. Do you require Equal Employment Opportunity policy statements from employment and referral agencies?	_____	_____	_____	_____
9. Are your recruitment materials, advertisements, etc., equally available to persons with impaired vision?	_____	_____	_____	_____
10. Are your job descriptions truly descriptive of the work to be performed?	_____	_____	_____	_____
11. Are all the tasks in the job description outlined <u>essential</u> to the performance of the job?	_____	_____	_____	_____
12. Does your application include a statement of non-discrimination against handicapped individuals?	_____	_____	_____	_____
13. Do all the application questions pertain to the job for which the applicant is currently applying?	_____	_____	_____	_____
14. Does your application ask medical history questions?	_____	_____	_____	_____
15. Does your job application include questions relating to Worker's Compensation?	_____	_____	_____	_____

Subpart B - Employment

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
16. If you test, is each applicant administered a job related test?	_____	_____	_____	_____
17. Do test results accurately reflect applicant's job skills?	_____	_____	_____	_____
18. Do you modify certain portions of the tests (e.g. use of brailers and abaci by persons with visual impairments; use of translators or typed material to provide information on test instructions to persons with hearing impairments; revision of test content for persons with visual impairments in cases where elaborate tables or graphs could be the basis for test answers; and the provision of other accommodations to persons who cannot take written tests or make the marks required for mechanically scored objective tests).	_____	_____	_____	_____
19. In any pre-employment interview or application, do you specifically request information as to whether the applicant is handicapped? If yes to question 19, answer questions 20, 21, and 22.	_____	_____	_____	_____
20. Are you:				
a. Taking remedial action at the request of the Director of OCR?	_____	_____	_____	_____
b. Taking voluntary action to overcome effects of conditions that resulted in limited participation in programs?	_____	_____	_____	_____
c. Taking affirmative action under Section 503?	_____	_____	_____	_____
If yes to any of the above, go to question 22.				

Subpart B - Employment

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
21. Have you informed the applicants that any information they choose to provide will remain confidential and will be used solely in connection with remedial, voluntary, or affirmative action efforts?	_____	_____	_____	_____
22. Do you have procedures to ensure that such information remains confidential?	_____	_____	_____	_____
23. Do reference checks include inquiries about handicapping conditions?	_____	_____	_____	_____
24. Do you require pre-employment physical examinations for applicants who have not received conditional offers of employment?	_____	_____	_____	_____
25. Are mandatory physical examinations given upon a conditional offer of employment done so for both handicapped and nonhandicapped individuals.	_____	_____	_____	_____
26. Is information regarding medical history kept confidential with the exception of:				
a. Supervisors and managers for purposes of reasonable accommodation;	_____	_____	_____	_____
b. First aid/safety personnel;	_____	_____	_____	_____
c. Government officials investigating compliance?	_____	_____	_____	_____
27. Have you taken steps to ensure that each of the following components of your personnel system does not discriminate against handicapped individuals?				
a. Upgrading	_____	_____	_____	_____
b. Promotion	_____	_____	_____	_____

Subpart B - Employment

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
c. Probation	_____	_____	_____	_____
d. Demotion	_____	_____	_____	_____
e. Transfer	_____	_____	_____	_____
f. Layoff	_____	_____	_____	_____
g. Termination	_____	_____	_____	_____
h. Right of return from layoff	_____	_____	_____	_____
i. Rehiring	_____	_____	_____	_____
j. Time off benefits	_____	_____	_____	_____
k. Seniority rights	_____	_____	_____	_____

Subpart C - Program Accessibility

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
<u>Parking Lots</u>				
1. Are accessible spaces approximate to the facility?	_____	_____	_____	_____
2. Are parking spaces open on one side, allowing room (12'-6" minimum width) for individuals in wheelchairs or on braces and crutches to get in or out onto a level surface?	_____	_____	_____	_____
<u>Walks</u>				
1. Are walks of a continuing common surface not interrupted by steps or abrupt changes in level?	_____	_____	_____	_____
2. Do walks have a level platform extending at least one foot beyond each side of the doorway at the top of which is (a) at least 5x5' if a door swings out onto the platform or toward the walk, or (b) 3x5' if door does not swing onto the platform?	_____	_____	_____	_____
<u>Ramps</u>				
1. Do ramps have a slope no greater than 1' rise in 12'?	_____	_____	_____	_____
2. Do ramps have handrails on at least one side?	_____	_____	_____	_____
a. Are they 32" in height measured from the surfaces of the ramp?	_____	_____	_____	_____
b. Are the surfaces smooth?	_____	_____	_____	_____
c. Do they extend one foot beyond the top and bottom of the ramp?	_____	_____	_____	_____

Subpart C - Program Accessibility

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
3. Do ramps have a surface that is nonslip?	_____	_____	_____	_____
4. Do platforms comply with question 2 under walks?	_____	_____	_____	_____
5. Do ramps have at least 5' of straight clearance at the bottom?	_____	_____	_____	_____
6. Do ramps have level platforms at 30' intervals for purposes of rest and safety, where they turn?	_____	_____	_____	_____
<u>Entrances/Exit</u>				
1. Is at least one primary entrance to each building usable by individuals in wheelchairs? (It is preferable that all or most entrances and exits should be accessible to, and usable by, individuals in wheelchairs or who have a physical disability).	_____	_____	_____	_____
2. Is at least one entrance usable by individuals in wheelchairs on a level that would make the elevators accessible?	_____	_____	_____	_____
<u>Doors/Doorways</u>				
1. Do doors have a clear opening of no less than 32" when opened?	_____	_____	_____	_____
2. Are doors operable by a single effort?	_____	_____	_____	_____

Note: two-leaf doors are not usable by those with disabilities unless they operate by single effort, or unless one of the two leaves meets the 32" width.

Subpart C - Program Accessibility

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
3. Are the doors operable with pressure or strength which could reasonably be expected from handicapped persons?	_____	_____	_____	_____
4. Is the floor on the inside and outside of each doorway level from a distance of 5' from the door in the direction of the door swing?	_____	_____	_____	_____
a. Does it extend 1' beyond each side of the door?	_____	_____	_____	_____
5. Are sharp inclines and abrupt changes in level avoided at door sills?	_____	_____	_____	_____
6. Do door closers allow the use of doors by physically handicapped persons?	_____	_____	_____	_____
<u>Stairs/Steps</u>				
1. Do steps avoid abrupt nosing?	_____	_____	_____	_____
2. Do stairs have handrails 32" high as measured from the tread at the face of the riser?	_____	_____	_____	_____
3. Do stairs have at least one handrail that extends at least 18" beyond the top and bottom step?	_____	_____	_____	_____
4. Do steps have risers 7" or less?	_____	_____	_____	_____
<u>Floors</u>				
1. Do floors have a nonslip surface?	_____	_____	_____	_____
2. Are floors on each story at a common level or connected by a ramp?	_____	_____	_____	_____

Subpart C - Program Accessibility

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
<u>Rest Rooms</u>				
1. Is there an appropriate number of toilet rooms for each sex?	_____	_____	_____	_____
a. Are they accessible by physically handicapped persons?	_____	_____	_____	_____
b. Are they usable by physically handicapped persons?	_____	_____	_____	_____
2. Do toilet rooms have turning space 60x60 to allow traffic of individuals in wheelchairs?	_____	_____	_____	_____
3. Do toilet rooms have at least one toilet stall that:				
a. Is three feet wide?	_____	_____	_____	_____
b. Is at least 36"x66" if wall hung water closets?	_____	_____	_____	_____
c. Have a door that is 32" wide and swings out?	_____	_____	_____	_____
d. Have grab bars on each side, 33" high and parallel to the floor, 1-1 1/2" diameter, and with 1 1/2" clearance between rail and wall, fastened securely to the wall at the ends and center?	_____	_____	_____	_____
e. Have width at least 48" between the wall and the front of the stall entrance?	_____	_____	_____	_____
f. Have water closet with seat at a minimum of 16 1/2" or maximum of 19 1/2" from the floor?	_____	_____	_____	_____

Subpart C - Program Accessibility

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
4. Do toilet rooms have lavatories with narrow aprons, which when mounted at standard height, are usable by individuals in wheelchairs?	_____	_____	_____	_____
5. Are drain pipes and hot water pipes covered or insulated?	_____	_____	_____	_____
6. Are some mirrors and shelves at a height as low as possible and no higher than 40" above the floor?	_____	_____	_____	_____
7. Do toilet rooms for men have wall mounted urinals with the opening of the basin 19" (14" for kids) from the floor, or have floor mounted urinals that are level with the main floor of the toilet room (14" for kids)?	_____	_____	_____	_____
8. Do toilet rooms have towel racks mounted no higher than 40" from the floor?	_____	_____	_____	_____
a. Are towel dispensers mounted no higher than 40" from the floor?	_____	_____	_____	_____
b. Are other dispensers mounted no higher than 40" from the floor?	_____	_____	_____	_____
c. Are disposal units mounted no higher than 40" from the floor?	_____	_____	_____	_____
9. Are racks, dispensers and disposal units located to the side of the lavatory rather than directly above?	_____	_____	_____	_____

Subpart C - Program Accessibility

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
<u>Water Fountains</u>				
1.	Is there an appropriate number of water fountains?		_____	_____
	Are they accessible to physically handicapped people? (You may use cups to facilitate accessibility.)		_____	_____
2.	Do water fountains or coolers have upfront spouts and controls?		_____	_____
3.	Are they hand operated?		_____	_____
4.	If coolers are wall mounted, are they hand operated, with basins 30" or less from the floor?		_____	_____
5.	If there are floor mounted fountains, are spouts no higher than 30"?		_____	_____
6.	Are the fountains accessible to people in wheelchairs?		_____	_____
<u>Public Telephones</u>				
1.	Is there an appropriate number of public telephones accessible to physically handicapped persons?		_____	_____
2.	Is height of the dial from floor 48" or less?		_____	_____
3.	Is coin slot located 48" or less from the floor?		_____	_____
4.	Are telephones equipped for persons with hearing disabilities?		_____	_____
5.	Are specially equipped telephones identified?		_____	_____

Subpart C - Program Accessibility

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
<u>Elevators</u>				
1. If more than a one-story building, are elevators available to handicapped persons?	_____	_____	_____	_____
2. Are all the controls 48" or less from the floor?	_____	_____	_____	_____
3. Are the buttons labeled with raised (or indented) letters beside them?	_____	_____	_____	_____
4. Are buttons easy to push or sensitive to touch?	_____	_____	_____	_____
5. Is the elevator cab at least 5x5 ft.?	_____	_____	_____	_____
<u>Controls</u>				
Are switches and controls for light, heat, ventilation, windows, draperies, fire alarms and all similar controls of frequent or essential use within reach of individuals in wheelchairs?				
	_____	_____	_____	_____
<u>Identification</u>				
1. Are raised or recessed letters or numbers used to identify rooms or offices?	_____	_____	_____	_____
2. Is identification placed on the wall, to the right or left of the door?	_____	_____	_____	_____
3. Are doors not intended for normal use, which might prove dangerous if a blind person were to exit or enter them, made quickly identifiable to the touch by knurling the door handle or knob?	_____	_____	_____	_____
<u>Warning Signals</u>				
Are audible warning signals accompanied by simultaneous visual signals for the benefit of those with hearing or sight disabilities?				
	_____	_____	_____	_____

Subpart C - Program Accessibility

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
<u>Hazards</u>				
1. When manholes or access panels are open and in use or when an open excavation exists on a site when it is approximate to normal pedestrian traffic, are barriers placed on all open sides at least 8' from the hazard, and warning devices installed?	_____	_____	_____	_____
2. Are there low hanging door closers that remain within the opening of a doorway, or that protrude hazardously into regular corridors or traffic ways?	_____	_____	_____	_____
3. Are there low hanging signs, ceiling lights, fixtures or similar objects that protrude into regular corridors or traffic ways? (A minimum height of 7' from floor is recommended.)	_____	_____	_____	_____
4. Is lighting on ramps adequate?	_____	_____	_____	_____
5. Are exit signs easily identifiable to all disabled persons?	_____	_____	_____	_____
<u>Miscellaneous</u>				
Are the following available?				
1. Place to accommodate dogs?	_____	_____	_____	_____
2. Signs indicating "Handicapped Parking"?	_____	_____	_____	_____
3. Carpeting which is easily maneuverable for persons in wheelchairs?	_____	_____	_____	_____

Subpart D - Delivery of Health Services

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
1. Are procedures used for determining eligibility for services different for handicapped persons than for nonhandicapped persons?	_____	_____	_____	_____
2. Do your admission, application or enrollment forms require information on handicapping conditions which are used to deny such admission or enrollment?	_____	_____	_____	_____
3. Have your reception and admissions personnel been oriented to accommodate a variety of handicapped persons who present themselves for treatment?	_____	_____	_____	_____
4. As a hospital or outpatient facility, do you have a procedure to ensure that alcohol and drug abusers will not be discriminated against in admission or treatment?	_____	_____	_____	_____
5. Do you have a policy which would deny a qualified handicapped person from participating as a member of a health care planning or advisory board?	_____	_____	_____	_____
6. Are procedures available to facilitate obtaining laboratory specimens (urine, blood, etc.) from blind, deaf and manually impaired emergency patients where instruction is vital to the validity of the test results?	_____	_____	_____	_____
7. Do physicians, physician assistants and/or nurse practitioners on medical staff have methods or procedures for taking medical histories from handicapped persons? (Particularly speech and hearing impaired persons.)	_____	_____	_____	_____

Subpart D - Delivery of Health Services

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
8. Do you have alternative methods and procedures for administering X-rays, intravenous pyelograms, etc., for handicapped persons (particularly amputees and other nonambulatory persons)?	_____	_____	_____	_____
9. Are social services, including recreation, letter writing, counseling, visiting arrangements, financial procedures, etc., equally available to handicapped persons as nonhandicapped persons?	_____	_____	_____	_____
10. Do you have a procedure by which your medical staff may complete a comprehensive physical examination of a handicapped person (i.e. blind, hearing impaired or non-ambulatory)?	_____	_____	_____	_____
11. Are signaling devices available at bedside for the use of handicapped persons?	_____	_____	_____	_____
12. As a health service provider that employs 15 or more people, do you supply auxiliary aides for communicating with persons who have impaired sensory, manual or speaking skills?	_____	_____	_____	_____
13. Are auxiliary aides available to admissions, emergency and social service care units for communicating with handicapped persons?	_____	_____	_____	_____
14. Are persons with impaired sensory or speaking skills provided with effective notice of benefits and services which you offer?	_____	_____	_____	_____
15. Do you provide effective notice to deaf and blind persons concerning their approval or waiver of rights to surgical and other treatment?	_____	_____	_____	_____

Subpart D - Delivery of Health Services

	Answer		Corrective Action Necessary?	
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
16. Do you have a procedure for effective communication with persons with impaired hearing for the purpose of providing emergency health care?	_____	_____	_____	_____
17. Has your emergency room staff received training in the use of auxiliary aides for use with deaf patients needing emergency health care services?	_____	_____	_____	_____
18. Do you have procedures to ensure that handicapped persons will be provided all aides, benefits and services in the most integrated setting appropriate to their needs?	_____	_____	_____	_____
19. Do you provide health services in separate settings for handicapped persons that are not able to participate in regular programs?	_____	_____	_____	_____
20. Although separate or special programs are made available, do you have procedures to ensure that qualified handicapped persons have an equal opportunity to participate in "regular programs"?	_____	_____	_____	_____

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