



North Central Texas Council of
Governments
Title VI Disability Access
Policy and Procedures

3/31/21

Introduction

As a recipient of federal financial assistance and under Title VI of the Civil Rights Act of 1964 and related statutes, the North Central Texas Council of Governments (NCTCOG) ensures that no person shall on the grounds of race, religion, color, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any agency programs or activities. These prohibitions extend from the North Central Texas Council of Governments, as a direct recipient of federal financial assistance, to its sub-recipients (e.g., contractors, consultants, local governments, colleges, universities, etc.). All programs funded in whole or in part from federal financial assistance are subject to Title VI requirements. The Civil Rights Restoration Act of 1987 extended this to all programs within an agency that receives federal assistance regardless of the funding source for individual programs.

Section 504 of the Rehabilitation Act of 1973, as amended, “prohibits discrimination on the basis of disability in programs and activities receiving federal financial assistance.” This policy is intended to establish procedures to ensure nondiscrimination and equal opportunity for persons with disabilities, who are not employees of NCTCOG, to participate in and benefit from the recipient’s programs and services. Under Section 504, NCTCOG is obligated to ensure the following:

- **Program Accessibility.** Equal opportunity to access programs, services, and activities that are delivered in the most integrated setting appropriate to the individual’s needs;
- **Physical Access.** Accessible new construction and alterations in accordance with applicable architectural standards;
- **Effective Communication.** Auxiliary aids and services, giving primary consideration to the individual’s preference regarding type of aid or service; and
- **Reasonable Accommodation.** Interactive processes are conducted with individuals to determine how best to meet their needs.

NCTCOG’s Nondiscrimination Policy

The North Central Texas Council of Governments (NCTCOG), as a recipient of federal financial assistance and under Title VI of the Civil Rights Act of 1964 and related statutes, ensures that no person shall on the grounds of race, religion, color, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any Agency programs or activities.

NCTCOG’s Notice of Reasonable Accommodation

North Central Texas Council of Governments (NCTCOG) is committed to providing individuals with disabilities an equal opportunity to participate in and benefit from NCTCOG’s programs, activities, and services. Individuals may request reasonable accommodations from NCTCOG that they believe will enable them to have such equal opportunity to participate in our programs, activities, and services. To request reasonable accommodations, contact Monte Mercer at 817-695-9121 or email mmercercer@nctcog.org.

Reasonable Accommodations

A reasonable accommodation is a change or modification to afford a qualified individual with a disability full enjoyment of NCTCOG's programs or activities, unless modifications of policies, practices, and procedures would fundamentally alter the nature of the program, service, or activity, or result in undue financial and administrative burdens to NCTCOG.

NCTCOG and its Departments have available the following accommodations for individuals with disabilities.

Accessible Website

NCTCOG is in the process of implementing a specialized software to ensure its Agency website adheres to Web Content Accessibility Guidelines (WCAG) in order to remove barriers and create an inclusive digital resource for all. The software scans and provides improvement recommendations for 1,200 plus web pages for potential accessibility issues.

Auxiliary Aids and Assistive Technology

The Workforce Solutions for North Central Texas (WSNCT) Workforce Center makes available on-site interpreters, auxiliary aids, and assistive technology in its workforce centers for program beneficiaries as needed for reasonable accommodations in order to minimize communication barriers and increase employability for customers served. The Workforce Centers provide resources for employment, career development, vocational rehabilitation, and childcare support for program beneficiaries. The following assistive technology and/or auxiliary aids are located at designated centers in the Assistive Technology Computer Station (ATCS), resource rooms, or training rooms. Auxiliary aids are available for checkout upon request.

- ZoomText (includes both features) at ATCS
- Headphones (that cover over the ears)
- Large Print Keyboards at ATCS
- Pocket Talkers
- ChatterVox Voice Amplifier (used for group settings)
- Telephones with volume control and hearing aid compatibility; including large button phones
- Sorenson Video Relay Service® (SVRS®) at ATCS
- UbiDuo™ System (communication devices)
- Large print or accessible digital content (based on customer request)
- Trackball Mouse
- Adjustable height desk at ATCS
- Keyboard seated on adjustable worktable of each assistive technology workstation (including but not restricted to resource and training rooms)
- Adjustable worktable located in the general training room in each workforce center

TTY Phones (Text Telephone)

The workforce centers make TTY phones available for individuals who are deaf, hard of hearing, or speech-impaired, allowing them to type messages back and forth on the telephone to one another instead of talking and listening.

Pocket Talkers

The pocket talker is a personal amplifier system. This device is available for use in workforce centers for one-on-one or group sessions, as needed.

In-Person Interpreters

Workforce Centers arrange for the continued availability and provision of qualified interpreter services for deaf and hard of hearing individuals who receive workforce center services. To provide effective communication with deaf and hard of hearing customers, the Workforce Center ensures the following:

- Determines the most effective and appropriate interpreter service provider
- Contracts interpreter services from a provider listed on the Communication Services for State Agencies (CSSA) contractors list located at: <https://dhhs.hhsc.state.tx.us/providers/CSSAContractors.asp>.
- Procures interpreter services from one of the following:
 - a local interpreting agency or qualified interpreter within the local workforce development area not covered by a CSSA;
 - a video remote interpreting provider.

Online Interpreter

Communications Services for the Deaf Interpreting Online (CSDIO) enables deaf and hearing people in the same room to communicate through an interpreter at a distant location. The workforce centers offer online interpreters, convenient for the program beneficiary who needs communication access when traditional in-person interpreting services are not available or practical.

UbiDuo™ System

The UbiDuo™ is a communication device that allows people who are deaf or hard of hearing to communicate instantly with anyone, face-to-face, without the need of a third party to interpret. With the use of this device, Workforce staff better serve and interact with program beneficiaries who are hearing impaired.

- The UbiDuo™ system is used for simultaneous instant messaging between staff and the customer in one-on-one or in group sessions, as needed, in order to remove the communication barrier;
- The UbiDuo™ is used at job fairs, rapid response events, employer interviews, etc. as needed to remove the communication barrier between potential employees and employers;
- Customers may check in/out the UbiDuo™ *if* needed for an employer interview or special event away from the Workforce Center location.

Training Resources

The Workforce Center provides physical and programmatic accessibility to employment and training services for individuals with disabilities. It uses the following resources to ensure customer access to high-quality workforce services that prepare individuals with disabilities for competitive, integrated employment:

- National Center on Workforce and Disability (NCWD) - provides articles, webinars and other resources designed to assist One-Stop systems in meeting the needs of individuals with disabilities. <http://www.onestops.info/>
- TWC Computer-Based Training (CBT) - People-First Language is designed to assist staff in communicating appropriately and respectfully with and about individuals with disabilities, emphasizing the individual first, not the disability. (Note: download poster “Communicating With and About People with Disabilities” by clicking here: https://www.cdc.gov/ncbddd/disabilityandhealth/pdf/disabilityposter_photos.pdf).
- TWC Classroom Training - offers courses to assist workforce center staff in the areas of basic facts, myths, rights, etiquette, accessibility, accommodations, and more.

Contact TWC Training & Development via email at:

training.development@twc.state.tx.us.

- TWC Accessibility Team - offers training and assistance to make documents, web content, and applications accessible: accessibility@twc.state.tx.us.
- Coalition of Texas with Disabilities (CTD) - focuses on governmental advocacy, public awareness activities, and professional disability consulting, which include interactive trainings and workshops. <http://www.txdisabilities.org/consulting>.
- American Foundation for the Blind - provides information and computer-based training on the latest adaptive technology for individuals who are blind. <http://elearn.afb.org/>.
- Association of Assistive Technology Act Programs (ATAP) - promotes the national network of Assistive Technology (AT) Programs. ATAP enables individuals with disabilities, service providers and others to learn about, access, and acquire AT needed for education, employment, and community living. ATAP provides device demonstration, information, videos, webinars, etc. www.ataporg.org
- Texas Technology Access Program (TTAP) - develops programs to improve access to, advocacy for, and awareness of Assistive Technology, and provides information and demonstrations of assistive technology to advocates, employers, and educators. <http://tatp.edb.utexas.edu/>.
- Texas Governor's Committee on People with Disabilities - offers online learning modules for making Word, PowerPoint, and Excel documents accessible at: <https://gov.texas.gov/organization/disabilities/accessibledocs>.

I Speak Cards

I Speak cards are maintained at the front desk or in the Resource Room of each Workforce Center to enable staff to quickly identify the customer's language.

Language Line

Language Line Interpreter Services is available for Workforce staff use 24/7.

Facilities

Workforce centers that are collocated with vocational rehabilitation staff have automatic door openers on customer restrooms and entrance doors.

All workforce centers have ADA-compliant customer workstations and training room tables.

All parking needs at workforce centers meet ADA requirements.

Public Meetings

NCTCOG eliminates barriers to participation in public meetings by hosting them at accessible locations and convenient times and posting video recordings, information and public comment opportunities online for ease of access. NCTCOG will make every effort to accommodate attendees with special needs if they provide sufficient notice.

NCTCOG uses the following methods for accessibility and accommodation of individuals with disabilities to participate in public meetings:

- Public meetings are held in diverse locations throughout the region, accessible to individuals with disabilities, preferably near transit lines or routes, at both day and evening times.

- Public meetings are recorded and archived on the NCTCOG website; when multiple public meetings are held on the same topic(s), at least one meeting in the series is recorded and archived on the NCTCOG website. In addition, public meeting materials and summaries are archived online and hard copies can be mailed upon request.
- Upon request, language translation, including sign and foreign language interpreters and handouts in large print or Braille, will be available.
- Meetings are held in buildings that are in full compliance with the Americans with Disabilities Act of 1990.

Telephone Town Halls

NCTCOG hosts telephone town hall discussions, which also allows for greater participation to those unable to appear in person. Telephone town halls are announced through NCTCOG Transportation Department communications, and interested individuals can sign up in advance to participate. The format is similar to a radio show, except participants listen in from their landline or mobile phones. Staff provides information on a topic and callers can respond with their questions or comments. An audio recording is then posted online and shared with members of the public who were not able to participate.

Reasonable Accommodation Process

NCTCOG's reasonable accommodation process includes the following:

Part I: Procedure for notifying program beneficiaries of how to request accommodations;

Part II: Procedure for accepting and responding to requests for reasonable accommodations;

Part III: Procedure for monitoring the provision of reasonable accommodations.

Part I – Procedure for Notifying Program Beneficiaries

Each NCTCOG department holding public meetings provides public meeting notices with the telephone number and email address for the person to contact for requesting accommodations. A minimum of three days advance notice is required for these arrangements to be provided.

The following statement is included on notifications (mailed postcard, flyers to libraries/cities/counties, newspaper ads, email notice/website) to provide for reasonable accommodations at no cost to the individual. Translation services are included in the budget each year.

For special accommodations due to a disability or for language translation, contact (name of department representative, phone number, and email address). Reasonable accommodations will be made. Para ajustes especiales por discapacidad o para interpretación de idiomas, llame al (pone number) o por (email address) con 72 horas (mínimo) previas a la junta. Se harán las adaptaciones razonables.

Newspapers

Public meeting notices are sent to selected newspapers to ensure regional coverage. Staff coordinates with non-English newspapers to provide translated notices to their readers. Public meetings are posted on the Texas Register website:

(<https://www.sos.state.tx.us/texreg/index.shtml>) as part of the Open Meetings requirement.

Public Libraries and City/County Offices

Public meeting notices are mailed to public libraries and city and county offices for posting. Notices for transportation public meetings are mailed and emailed to individuals, elected officials, transportation partners and organizations on the public involvement contact list. To be included, individuals may subscribe at meetings and events, on the website or by contacting NCTCOG. Staff coordinates with public information officers of the cities in which meetings are scheduled to request assistance in posting information on the city's cable television channel, websites and social media accounts.

Mail and Email

The public involvement mail and email lists are the most direct forms of communication used by NCTCOG to inform and engage the public.

Individuals receive public meeting notices, information about public review and comment opportunities, announcements of workshops or open houses, educational brochures, newsletters, and other material suitable for mass mailings. The lists are continually maintained and expanded based on sign-up sheets at public meetings and community events and requests sent through the NCTCOG website.

Advertising

Paid advertising is used to announce public meetings, opportunities for public review and comment and other initiatives. Ads are placed in select newspapers, including minority publications, to ensure regional coverage.

Media Relations

Proactive media outreach efforts include distributing news releases on major projects and programs and opportunities for public input to more than 240 reporters at local media outlets and community news sources, including minority news media. The extensive media list includes all major local television stations and newspapers as well as several radio stations. The media contact list is continuously updated, and staff are committed to coordinating with local editors and news directors to provide timely and accurate information. Staff participates in interviews with local and national print, radio and television media. NCTCOG posts all of its news releases on its website in an online newsroom that is accessible to the public.

Workforce Centers

Program beneficiaries may access information about workforce center services through visiting a Workforce location, or by viewing the public NCTCOG website (<https://www.nctcoq.org/home>) or Workforce Solutions website (<https://www.dfwjobs.com/>).

Part II – Procedure for Accepting and Responding to Requests

Point of Contact for Requesting Reasonable Accommodations

Individuals requesting a reasonable accommodation may do so by (1) calling, e-mailing, or writing the department, program, or activity representative, if known or published in the notice; or (2) calling, e-mailing, or writing the NCTCOG contact.

NCTCOG POC

Name: Monte Mercer
Phone Number: 817-695-9121
Email: MMercer@nctcog.org
Address: 616 Six Flags Dr.
Arlington, TX 76011

To request accommodations and use of auxiliary aids and services at workforce centers, call the following numbers:

817-695-9184 or 1-888-548-WORK
TDD: 1-800-735-2989; Voice: 1-800-735-2988

Requesting Reasonable Accommodations

To submit a request for a reasonable accommodation, contact the department representative providing notice of the program or event, if known or published in the notice. If the department, program, or event contact information is unknown, contact Monte Mercer at phone number 817-695-9121 or email MMercer@nctcog.org.

Accommodation Request Process Overview

The following is a description of how a reasonable accommodation request will be handled once received by NCTCOG.

RECEIPT OF REQUEST

Request is received by NCTCOG:

Requests may be made via phone, e-mail, or mail. Requests may be in writing but do not need to be; however, making a written request can be helpful documentation for ensuring that the desired accommodation is understood. The individual does not need to use the specific words “reasonable accommodation” when making the request. Requests need to be made at least 3 business days in advance of when needed.

Request is tracked:

Requests will be tracked and basic data will be maintained on each request received, including name of individual, contact information, and a description of the accommodation requested.

REVIEW

Request is reviewed:

Upon receiving a request, the department representative sponsoring the program or activity, or the NCTCOG point of contact, will review the request to determine whether the accommodation can be granted.

In some cases, the representative reviewing the request will need to consult with the individual in an interactive process to determine on a case-by-case basis whether and what accommodations can be made. The questions will be limited to understanding the barrier to the individual's ability to participate in the program or activity and the nature of an accommodation that will remove this barrier.

RESPONSE

Within 2 days of the receipt of the request, the representative will contact the individual making the request to notify them of the decision.

1. If the accommodation can be granted, the individual will be notified of the decision.
2. If the accommodation cannot be granted, the individual will be notified of reasonable accommodations that may be granted, if any.
3. If a requested accommodation cannot be provided immediately, interim accommodations may be considered.

How to Obtain Accommodations

Persons granted a reasonable accommodation work closely with each department representative named in the notice to obtain the accommodation, specific to the program or activity involved. If the department representative is unknown, contact the NCTCOG point of contact, Monte Mercer.

Confidentiality

NCTCOG appropriately secures and maintains the confidentiality of personally identifiable information (PII) provided in the request for reasonable accommodations to ensure that only those employees with a need to know have the information.

Future Accommodations

Because of the variety of programs and services offered throughout various locations in the region that change, accommodations will need to be requested each time they are needed.

Part III – Procedure for Monitoring

Departments have a record-keeping system in place so they can monitor:

- The number and type of requests for reasonable accommodations received in a designated period (e.g., annually);
- The number of such requests that were denied and reason(s) for denial;
- The number and type of alternate accommodations, if any, that were provided; and
- A summary of circumstances regarding any denials based upon a determination of fundamental alteration or undue burden to NCTCOG.