# The Community Partnership for the Prevention of Homelessness



## Housing Provider Reasonable Accommodation Manual

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#### **TCP's Reasonable Accommodation Policy**

#### Introduction

Program Rules

All shelter or housing programs funded through the Department of Human Services and managed by The Community Partnership must have Program Rules that are approved annually - first by The Community Partnership, and then by the Department of Human Services. Program Rules outline clients' eligibility requirements, rights, responsibilities and program sanctions. All approved program rules should be signed by clients at the time of entry into the program.

#### Non-Discrimination Statement

The Department of Human Services complies with Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988), Executive Order 110063, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and Titles II and III of the Americans with Disabilities Act (ADA).

These laws require that people with disabilities be afforded the same privileges and opportunities afforded individuals without a disability. All programs and services through the services must not exclude people with disabilities and must make reasonable accommodations, or slight changes in rules and policies, when necessary to provide a person with a disability equal access.

This policy is designed to educate staff and customers on how to ensure people with disabilities have equal opportunities to access all programs in an integrated setting.

#### Person with a disability

The definition of a person with a disability for purposes of nondiscriminationis:

- An individual who *has* a physical or mental impairment that substantially limits one or more major life activities – including such conditions as blindness, deafness, cerebral palsy, cancer, heart disease, mental limitations, brain injury, emotional or mental illness, and specific learning disabilities; and/or
- An individual who *has a record of* a physical or mental impairment that substantially limits a major life activity, including people who have recovered from mental or emotional illness, drug addiction, heart disease, or cancer; and/or
- An individual who *is regarded as* having such a disability, regardless of whether they have the disability. Common examples are someone who is obese or someone who is scarred due to injury, where there is no functional impairment, but people may regard the person as having a disability.

Physical or mental impairments generally included in the definition of disability are practically any condition, disease, illness, disfigurement or disorder (e.g., alcoholism, AIDS, emotional disorder, drug addiction, mental retardation, cerebral palsy, cancer, deafness, or HIV infection),

if the impairment substantially limits one or more major life activities. Major life activities include caring for self, performing manual tasks, walking, seeing, hearing, breathing, learning, working, and major bodily functions such as cell growth and the immune system. This is not an exhaustive list; other life activities can also be major.

#### Reasonable Accommodations

A reasonable accommodation refers to modifications in policies, practices, or procedures when necessary to avoid discrimination on the basis of disability. Reasonable accommodations also can be a structural change made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment of the premises. The requirement to provide reasonable accommodations is intended to give people with disabilities equal opportunity to participate in TCP programs. Some program rules may deny access to people with disabilities unless modified. For example, "no pets" policies deny access to people with disabilities who rely on the assistance of service or companion animals. A reasonable accommodation in this case would be permitting the individual with a disability to utilize a service animal.

This policy is not intended to provide greater program benefits to persons with disabilities than to non-disabled clients or applicants. It may mean, however, that persons with disabilities will sometimes be treated differently in order to ensure equal access to programs and services. A reasonable accommodation must be provided unless making a modification would fundamentally alter the nature of the service, program, or activity.

#### Providing Reasonable Accommodations

When considering whether to grant a reasonable accommodation request, a provider should only take the following into consideration:

- Is the individual a qualified resident?
- Is the request for an accommodation necessary for the qualified resident to enjoy equal opportunity and access to the program?
- Would the requested accommodation require a fundamental alteration in the nature of the program or impose an undue financial or administrative burden on the program?

#### Qualified Residents

A "Qualified Resident" is any individual with a disability who, with or without reasonable accommodations, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by TCP and the providers contracted by TCP. Reasonable accommodations are changes to rules, policies, or practices, the removal of architectural, communication, or transportation barriers, or the provision of auxiliary aid and services.

In order to receive an accommodation a client must otherwise meet all the eligibility requirements of the program. For example, in order to qualify for entry into a women's shelter, the individual must be a woman. A man, even if he has a disability, would not be a qualified

resident because he does not otherwise meet the eligibility requirements of the program.

Secondly, the person must be defined as an individual with a disability: she or he has, has a record of, or is regarded as a person with a physical or mental impairment that substantially limits one more life activities. (See also p. 1)

#### Request for an Accommodation

A client has the right to request a reasonable accommodation at any timewhile residing in a program. Information regarding the process of requesting a reasonable accommodation will be made available to applicants and clients at the time of application, at any time the District government, TCP or a shelter or housing provider proposes to take adverse actions against a client, or any other time upon request. For emergency actions shelter staff will make a reasonable effort to notify clients of their right to request a reasonable accommodation.

Information on how to request a reasonable accommodation will also be provided at such other times as TCP Contractors deem appropriate, including educational opportunities for staff and clients. Forms and other documents used for applicants and clients will be written in plain language. TCP will present documents in alternative formats, provide auxiliary aids, or communicate with a third party designated by the client.

Providers are required to display the DHS prescribed accommodations flyer at intake facilities. If providers need additional Accommodations flyers, please contact The Community Partnership for the Prevention of Homelessness.

Once an applicant or client requests an accommodation, the provider may not ask about the nature or severity of the disability in question. The provider need only consider whether or not the request is *reasonable* in terms of cost and alteration of their program. They may ask questions which will clarify what it is about the policy, practice or procedure that serves as a barrier (so that the provider may offer an alternative solution); however, they should <u>not</u> attempt to determine whether or not the request is necessary for theindividual in question. That is a determination to be made by the individual and/or his or her advisor.

#### Common Accommodations

The following is a short list of sample accommodations that can generally be provided without imposing an undue burden or constituting a fundamental alternation.

#### Accessible Room

One of the most common and easiest accommodations is to place a person with a disability into a space that is fully accessible to them. This may mean ensuring someone is on the first floor and/or has a fully accessible bathroom. It may also include providing extra space for someone if they are accompanied by a caregiver or service animal, or providing a more private space to someone with severe anxiety. It is important to remember that people with all types of disabilities, not only mobility disabilities, may need extra space or a slightly altered space in

order for them to be accommodated and have an equal opportunity to benefit from TCP programs.

#### Service and Companion Animals

Service animals are often essential to people with disabilities, and as such will be permitted. Service animals are dogs that are individually trained to do work or perform tasks for a person with a disability, for example dogs trained to assist a person who is blind or a person who is deaf. If the animal does not have specific training related to disabilities the animal is not considered a service animal. A companion animal may not have disability-related training but is necessary for a person coping with a disability (for instance, if the animal provides emotional support to a person with a panic disorder), the animal is considered a companion animal. Please check with program rules for each specific shelter to see if companion animals are acceptable.

If the disability and the need for the service animal is apparent, then no additional documentation should be required. In addition, a provider cannot require special ID cards for the animal or ask about nature and severity of the client's disability. However if the need is not apparent, the shelter program may ask if the client is an individual with a disability, if the animal is a service animal, and what tasks the animal has been trained to perform for them specifically

A person with a disability can be asked to remove a service or companion animal from the premises if, the animal is out of control and the client doesnot take effective action to control it (for example, a dog that barks repeatedly through a group therapy session) or, the animal poses a direct threat to the health, or safety of others (for example, a dog that appears to have rabies or demonstrates it is sick).

In these cases, the shelter program should give the person with the disability the option to obtain goods and services without having the animal on the premises.

Shelter programs, including those that prepare food, must allow service animals in **public** areas, even if state or local health codes prohibit animals on the premises. Shelter programs are not required to provide care or food for a service or companion animal or provide a special location for it to relieveitself.

A provider should provisionally allow a service animal into a shelter or housing program while a reasonable accommodation request is being processed.

The client will be responsible for the animal's care and the animal must be kept in a manner which does not violate the provider's program rules.

#### Auxiliary Aids and Services

To facilitate communication with persons with disabilities, the serviceprovider shall furnish appropriate auxiliary aids. Auxiliary aids are services or devices that enable persons with impaired sensory, manual or speaking skills to have an equal opportunity to participate in, and to enjoy the benefits of programs and activities.

In determining what auxiliary aids are necessary, service providers shall give primary consideration to the request(s) of the individual with disabilities.

If the Provider is unclear about whether a request constitutes an undue burden or fundamental alteration, they must call The Community Partnership at 202-543-5298. The request is reviewed by TCP and if a determination cannot be made, TCP will submit the request to the Department of Human Services ADA Coordinator.

#### Discontinuation of Reasonable Accommodations

Providers may not change or discontinue a reasonable accommodation without first obtaining approval from TCP. Once the change or discontinuation of the reasonable accommodation has been approved by TCP, the provider must then notify the client or designee in writing of this decision and include notice of the client's right to appeal the decision found on the back of the Request for Reasonable Accommodation form.

#### **Emergency Situations**

Each provider must have an evacuation procedure that aligns with their building's specifications. Providers should meet with staff to prepare, plan and practice for emergency situations and include persons with disabilities in this discussion.

Carrying a person with a disability up stairs or out of their wheelchair is only an acceptable reasonable accommodation policy or practice in an emergency situation. For example, if the choice is between leaving someone out in the cold or carrying them up the stairs, it would be necessary to carry the person who is not independently mobile.

#### Reasonable Accommodation Procedure

#### Notice of Reasonable Accommodation Policy

Upon application of a program each client should be provided the Reasonable Accommodation brochure. It should be reviewed with the applicant to ensure that he/she fully understands the content.

Note: Acknowledgements of receipt of the brochure or inquiry into the need for a reasonable accommodation at the time of intake in no way reduces or effects clients' rights to request reasonable accommodations at any time they are in shelter or housing programs.

#### How A Client Makes A Request

The process for making a Reasonable Accommodation Request is outlined in the "Client Reasonable Accommodation Procedures" document within the *Provider Reasonable Accommodation* 

Forms and Procedures Packet. However, if the applicant or client cannot complete the form, he or she may make a request for reasonable accommodation in any manner which is most

effective for them. No request can be denied just because a client did not used the preferred forms or procedures outlined herein.

If an applicant/client does not use the form, staff must still respond to the request for a reasonable accommodation and assist the applicant/client in completing the form and in acquiring any information needed to make a decision on the request. Although the process for requesting a reasonable accommodation is standardized, each request will be treated uniquely. The results will be unique to the individual and the facility and/or circumstances involved.

All information regarding a request is contained on the Request for Reasonable Accommodation form. This form should be completed to the fullest extent possible immediately after it is received. The form should be retained for TCP's recording purposes.

Whenever possible, reasonable accommodation decisions in emergency or short term shelter must be made as soon as possible, ideally as soon as the request is made and both denials and agreements to make accommodations must be documented in writing. Forms and notifications will be provided in a format accessible to the client or applicant. Any meetings with applicants or clients required by this policy must be held in an accessible location.

If the shelter provider is inclined to deny the request in whole or in part, final approval to do so must be obtained from The Community Partnership. It is imperative that no provider deny any accommodation request before discussing the case with The Community Partnership.

Providing or Denying an Accommodation Request

All communications, including but not limited to emails, faxes and letters sent and received regarding an accommodation request, must be kept on file with the paper request form.

If the client's disability and need for the accommodation is clear or known to the provider, no additional verification or information should be required and the accommodation should be approved upon the person's entry into the program. For example, a person who uses a wheelchair should not have to provide verification in order to access a wheelchair accessible bathroom. If more information or verification is required to process the request, the provider can ask for only the information that is necessary to make a determination of the request. The Reasonable Accommodation Verification Form can be used for verification of disability. Verification also can be given orally or in writing without using the form.

Persons qualified to verify information include counselors, social workers, physicians, psychiatrists, professionals at non-medical service agencies, peer support groups, or a reliable third party who is in a position to know about the client's disability. Staff at TCP or service providers who have knowledge of a person's disability can provide verification. Once the Reasonable Accommodation Verification Form is returned or other verification is given, it must be kept confidential.

The Notification of Accommodation Status form should be completed every time there is a change in the status of a reasonable accommodation. A copy of the form should be given to the

client and the original form should be put in client's file.

If the Provider is unclear about how to handle a request or whether the documentation provided is sufficient, they must contact the The Community Partnership. This can be done by completing the TCP Reasonable Accommodation Submission Form, located at <a href="https://app.smartsheet.com/b/form/7a91df3c256642a583293e22e9a5e522">https://app.smartsheet.com/b/form/7a91df3c256642a583293e22e9a5e522</a>. The request is reviewed by TCP and if a determination cannot be made, TCP will submit the request to the Department of Human Services ADA Coordinator and/or the Office of Disability Rights for assistance.

#### When to Grant A Reasonable Accommodation Request

- Reasonable accommodation requests must be granted immediately if the denial of the request is likely to cause serious harm to the individual with a disability.
- Reasonable accommodation requests may be granted on a provisional basis when the provider has requested additional information or documentation.
- If an accommodation request would result in a fundamental alteration to the nature of the program, the provider is not required to provide it, but the provider must consult with TCP before denying it.
- If an accommodation request would pose an undue financial or administrative hardship to the program, the provider is not required to provide it, but the provider must consult with TCP before denying it.
- If an accommodation request would result in a direct threat to the health and safety of others, the provider is not required to provide it, but the provider must consult with TCP before denying it. However, if Shelter Staff determines that complying with the accommodation request even on a provisional basis will present an immediate risk to the health and safety of others, and the probability of potential injury will NOT be sufficiently reduced by the reasonable accommodation, then Shelter Staff may act immediately to deny the accommodation request. In such cases prior consultation with TCP is not necessary but TCP should be notified of the decision immediately.
- If an accommodation request is for a structural change, such as building a ramp or lowering countertops, the provider must consult with TCP before determining whether the accommodation can be granted.
- If an accommodation request involves a permanent supportive housing client who is not housed at a TCP housing provider and the request cannot be met by TCP, such as a request to mail in rent payment in lieu of hand- delivering rent, then the Reasonable Accommodation Procedure Involving a Third-Party Landlord should be followed. This policy is outlined in the "Client Reasonable Accommodation Procedures" document within the Provider Reasonable Accommodation Forms and Procedures Packet.

#### **Privacy**

It is important for employees to remember that all communications received or sent regarding an accommodation request must be handled with privacy and care. All customers have a right to full privacy regarding the existence of a disability and any need for an accommodation.

### Training

Training on ADA policies and procedures will occur through staff meetings at the individual service centers and through scheduled Reasonable Accommodation Policy and Procedure Trainings. Each new staff member will receive training within 3 months from the date of hire, and ongoing trainings will be provided for all staff on a quarterly basis.

#### **Sample Scenarios**

**Example 1**: A housing program has a policy of providing unassigned parking spaces to residents. A resident with a mobility impairment, who is substantially limited in her ability to walk, requests an assigned accessible parking space close to the entrance to her unit as a reasonable accommodation. There are available parking spaces near the entrance to her unit that are accessible, but those spaces are available to all residents on a first come, first served basis.

The provider must make an exception to its policy of not providing assigned parking spaces to accommodate this resident.

**Example 2**: A housing program has a policy of requiring clients to come to the rental office in person to pay their rental contribution. A client has a mental disability that makes her afraid to leave her unit. Because of her disability, she requests that she be permitted to have a friend mail her rent payment to the rental office as a reasonable accommodation.

The provider must make an exception to its payment policy to accommodate this client.

**Example 3**: A shelter/housing program has a "no pets" policy. A client who is deaf requests that the provider allow him to keep a dog in his unit as a reasonable accommodation. The client explains that the dog is an assistance animal that will alert him to several sounds, including knocks at the door, sounding of the smoke detector, the telephone ringing, and cars coming into the driveway.

The housing provider must make an exception to its "no pets" policy to accommodate this client.

**Example 4**: Because of his disability, an applicant with a hearing impairment needs to keep an assistance animal in his unit as a reasonable accommodation.

The housing provider may not require the applicant to pay a fee or a security deposit as a condition of allowing the applicant to keep the assistance animal. However, if a client's assistance animal causes damage to the unit or the common areas of the dwelling, the housing provider may charge the client for the cost of repairing the damage (or deduct it from the standard security deposit imposed on all clients), if it is the provider's practice to assess clients for any damage they cause to the premises.

**Example 5**: As a result of a disability, a client is physically unable to open the dumpster placed in the parking lot by his housing provider for trash collection. The client requests that the shelter/housing program send a maintenance staff person to his apartment on a daily basis to collect his trash and take it to the dumpster.

Because the housing development is a small operation with limited financial resources and the maintenance staff are on site only twice per week, it may be an undue financial and administrative burden for the housing provider to grant the requested daily trash pick - up

service. Accordingly, the requested accommodation may not be reasonable. If the housing provider denies the requested accommodation as unreasonable, the housing provider should discuss with the client whether reasonable accommodations could be provided to meet the client's disability - related needs - for instance, placing an open trash collection can in a location that is readily accessible to the client so the client can dispose of his own trash and the provider's maintenance staff can then transfer the trash to the dumpster when they are on site. Such an accommodation would not involve a fundamental alteration of the provider's operations and would involve little financial and administrative burden for the provider while accommodating the client's disability - related needs.

**Example 6:** A client has a severe mobility impairment that substantially limits his ability to walk. He asks his housing provider to transport him to the grocery store and assist him with his grocery shopping as a reasonable accommodation to his disability.

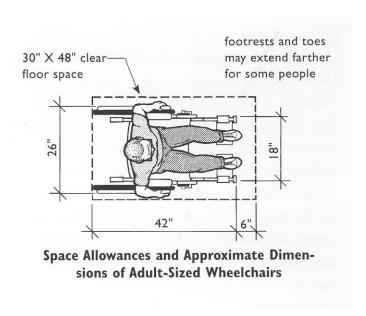
The provider does not provide any transportation or shopping services for its clients, so granting this request would require a fundamental alteration in the nature of the provider's operations. The request can be denied, but the provider should discuss with the requester whether there is any alternative accommodation that would effectively meet the requester's disability - related needs without fundamentally altering the nature of its operations, such as reducing the client's need to walk long distances by altering its parking policy to allow a volunteer from a local community service organization to park her car close to the client's unit so she can transport the client to the grocery store and assist him with his shopping.

#### **Measuring for Accessibility 101**

Introduction: This is a basic guide to assist you in evaluating the accessibility and usability of your building or facility by persons with disabilities. You are generally evaluating whether a person with a physical disability can approach, enter, use and exit your building. This does not mean that every part of your facility must be accessible; rather, it means, for example, that a person using a wheelchair can enter your building and have an equal opportunity to use and/or benefit from your services.

All accessibility standards use a wheelchair-user as a baseline for access. If a wheelchair-user has access, persons with other physical disabilities will also be able to use the facility's services (e.g., persons using crutches, canes, walkers, leg-braces, etc.). There are additional provisions that are specific to persons who are blind and/or deaf.

The space that a wheelchair occupies when sitting still is 48" by 30". This is referred to as the clear-floor space. The 30" is the width of the chair (side-to-side) and the 48" is the length of the wheelchair from the back wheels to the toes.



This access checklist or survey will determine whether a wheelchair-user can get from one point to another without a physical or architectural barrier (e.g., steps, doors that are too narrow, light switches that are to high, toilet stalls that are too narrow or too small, etc.)

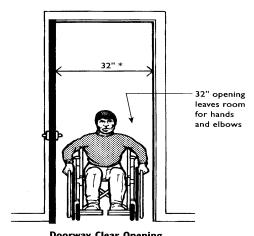
Recommended Tools: This checklist, tape measure, pen and clipboard.

How do consumers get to your program?
Taxi
Public Transportation
Ride from social services agency
Car
Walk-in
If consumers use their own car, are parking spaces provided?
YesNo
If yes, are any of those spaces identified by the International Access Symbol?
3
Yes No
10

B. From the arrival point, is there an accessible route from this point to and through the entrance to your facility? Remember, you are looking for the route where a wheelchair-user can move from the arrival point into your building.

[Note: A wheelchair-user traditionally pushes the wheels to move the wheelchair. Therefore, to get through a door, the doorway needs to be a minimum of 32" wide. The path or route must be a least 36" wide to allow for another person, not using a wheelchair, enough space to pass by the wheelchair.

- \*• 32" clear minimum for accessible doors
- 32" nominal clear width for usable doors

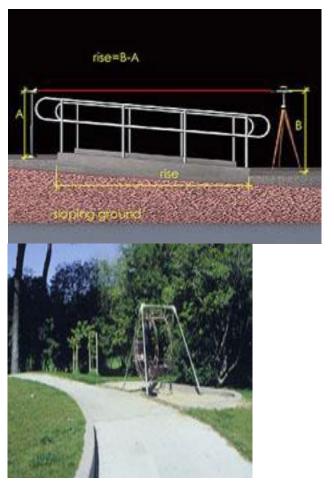


24 max 610 48 min 1220 1220 1220 1220 1220 1220 1220 1220 1220 1220 1220

- C. Steps cannot be part of an accessible route. Does the path from the arrival point to the entrance contain: (Check all that apply)
  - \_\_\_\_Ramp
  - Sidewalk
  - Lift or Elevator
- D. A ramp or path (sidewalk) should not be too steep. A ramp can be steeper than a sidewalk because it is required to have handrails on both sides and a 5-foot or 60" square clear space at the bottom and top of the ramp. A sidewalk is not required to have handrails and must have a 5- foot or 60" space at the entrance door only. Both a ramp and a sidewalk must be at least 36" wide.

  [Note: The 5-foot or 60" turning space is the area needed for a wheelchair-user to enter, turnaround and exit.]

For ramps, the slope must not be any steeper than 8.33% or 1 in 12. This simply means that for every inch of the height of the barrier (e.g., steps); the ramp must be 12" long. For every foot of height of the barrier, the ramp must be 12' long. For example, if a ramp is to provide an alternative route for a step that is 5-inches high, the ramp must be at least 60" or 5' long.



The degree of slope of a sidewalk is primarily the responsibility of the DC government; however, if you, staff members, or consumers have difficulty with the slope of the path or sidewalk, make note of it here:

- E. Doors. Check all that apply to your primary entrance doors.
  - 1. When the door is opened, does the doorway provide at least 32" of clearance? [Note: This includes the door jamb and the thickness of the door but not the door handle.]

\_\_\_\_Yes \_\_\_\_\_No, how wide? \_\_\_\_\_

2. Does the door have a lever-door handle?



	YesNo, the hardware is	type.
3.	Does your door use an automatic opener (button to open/operate) or a poassisted door hinge?	wer-
	YesNo,	
	If no, is the door difficult to pull or push open? Does the door take seconds to close?	at least 3
4.	Is the threshold at the doorway ½" high or less?	
	1:2 max — 1/2" max	
	YesNo	
	Is the threshold curved or beveled?	
	YesNo	
	ou have signage which directs visitors to the accessible entrance?	
Y	YesNo	
mon Areas		
	where everyone goes when they enter or exit a building. Some of the feature	ures of a
ımon area ar		
•	Reception Area	

Common Are

- Public Restroom
- Waiting Area
- Laundry Facility
- Mail Boxes
- Meeting or Dining Areas Public Office Areas

G. Are there public restrooms (this does not include employee restrooms or resident's bathrooms)?

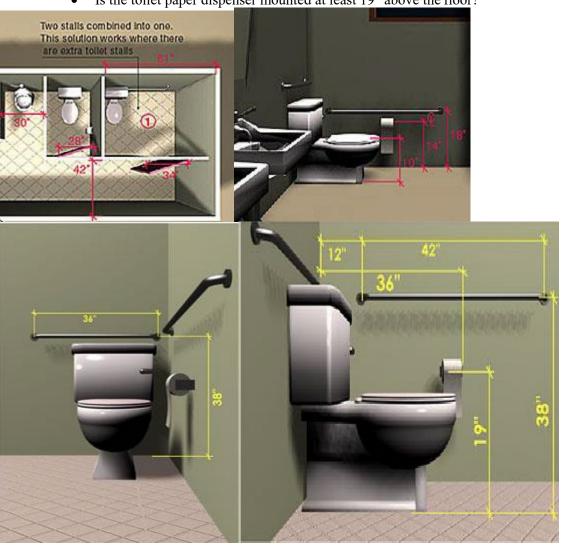
\_\_\_\_Yes \_\_\_\_No

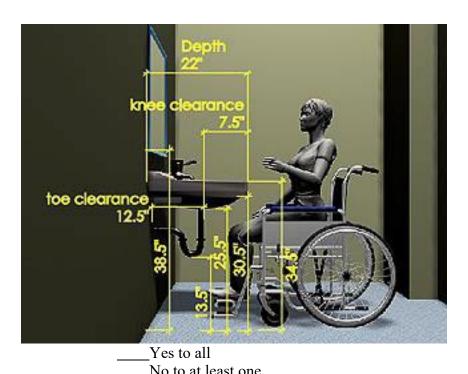
If yes, does the doorway provide at least 32" clear opening?

\_\_\_\_Yes \_\_\_\_No

- Is there at least one accessible stall which contains a door that provides at least 32" clearance (width)?
- Does the inside of the stall measure at least 59" by 60"?
- Are there grab bars on the back and side of the water closet?
- Is the height of the toilet when the lid is down, at least 17" 19"?
- Is the center of the toilet-seat opening no farther than 18" from the wall measuring sideway to the wall (centerline measurement)?

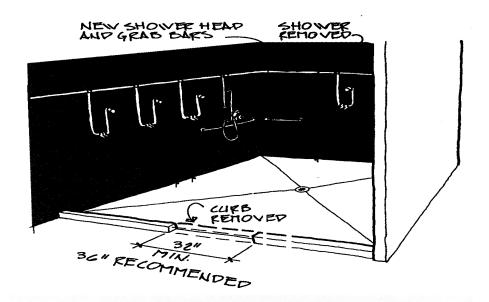
• Is the toilet paper dispenser mounted at least 19" above the floor?



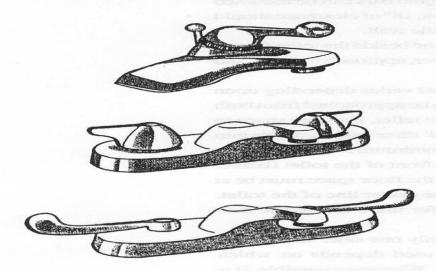


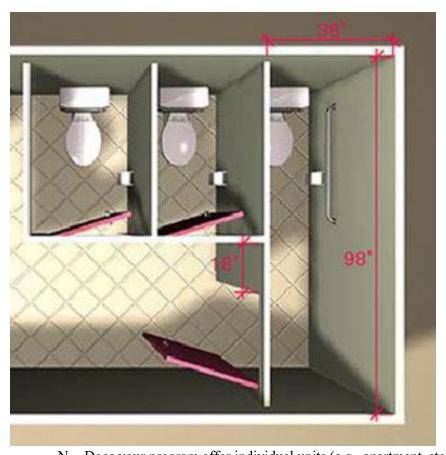
	No to at least one	
	Explain:	
Н.	1	
	Yes	No
	If yes, is the room on an acce	
	' <del></del>	No
	If food is served to consumer	rs using food trays, is the counter no higher than 36'
	above the floor?	
	Yes	No
I.	Are laundry machines available	e to consumers?
	Yes	No
	If yes, is the laundry room or	n an accessible route?
	Yes	No
	If yes, do at least one washer	and one dryer have the door on the front of the
	appliance to permit a wheeld	chair-user to reach/use the appliance?
	Yes	No
J.	J. Are mailboxes provided in yo	our facility?
	Yes	No
	If yes, is 20% of the total nu	umber of mailboxes located at a maximum height of
	54" above the floor/ground?	
	Yes	No
K	K. Does your program provide en	mergency housing only?
	Yes	No
	If yes, are all sleeping area	us (beds, cots) located on an accessible route?
	Yes	No
	If no, how many beds are I	located on an accessible route?

. Are all restrooms and shower areas used by program participants located on an			
accessible route?			
Yes	No		
If no, what percentage	of these restrooms is located on	an accessible rou	ıte?
M. Are at least one toilet (wa	ater closet) and one shower enclose	ed in an area that is	at least
36" wide?	Yes	No	
Does the shower thresh	old measure ½ " or less?	Yes	No
Are there grab bars at the	he toilet and shower/tub?	Yes	No
Does the sink and show	ver/tub have lever-type faucet co	ontrols?	
Yes	No		





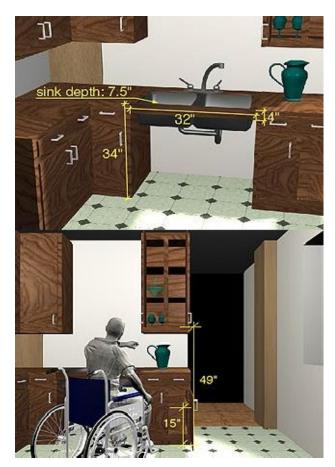




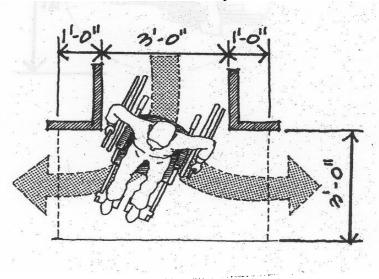
IN.	Does your program offer individual units (e.g., apartment, etc.)?		
	YesNo		
Do all doorways in this unit, including the entrance, provide a clear open			
	of at least 32"?		
	YesNo		
	Is there an accessible route (36" wide with doorways providing at least 32"		
	clear opening) through the unit and into all rooms?		
	Yes		
	No, if no which doorways do not provide 32" clear opening and which		
	rooms are not located on an accessible route?		
	Doors		
	Room		
O.	Does at least one bathroom contain all of the following features?		
	• Located on an accessible route?YesNo		
	• Toilet seat mounted at a height of between 17" - 19"?		
	YesNo		
	• Toilet centerline that measures between 17" - 19"?		
	YesNo		
	• Grab bars mounted on the back and side walls adjacent to the toilet?		
	YesNo		
	• Sink mounted no higher than 34" from the floor with open area under the sink of		
	at least 29" between bottom of sink and floor?		

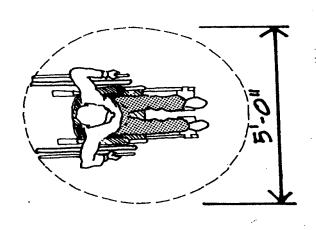
\_\_\_\_Yes \_\_\_\_No

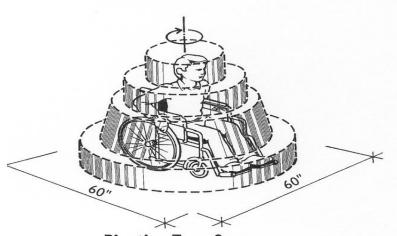
• Mirror mounted so that bottom of the reflective surface is no higher than				gher than 40"	above		
	the	e floor?		_Yes	1	No	
	• Gr	rab bars mounted on	back and side v	walls of the tul	or shower	?	
		Yes	No				
P.	If a kit	chen is provided in t	his unit, does it	t contain the fo	ollowing fea	itures?	
	•	Located on an acce	essible route?		Yes	No	
	•	Clear floor space p	rovided at all a	ppliances?		Yes	No
	•	Kitchen sink mour	ted no higher t	han 34" above	the floor w	ith a sink dep	th no
		greater than 6 ½"?			Yes	No	
<ul> <li>At least one counter area that measures 30" wide and no greater t</li> </ul>				eater than			
		34" above the floor	r?		_Yes	No	
	•	If a cabinet is prov	ided under the	sink, is it remo	ovable?		
		Yes	No				



## Additional Graphics







**Pivoting Turn Space** 

