



A ValorUS® and  
Arc of California Project

# Model Accommodations Policy for Survivors & Survivors with Intellectual & Developmental Disabilities

## **Model Accommodations Policy**

**\*\*This project is supported by Grant No. 2019-FW-AX-K008 awarded by the Office on Violence Against Women, U.S. Department of Justice. The opinions, findings, conclusions and recommendations expressed in this publication are those of the author(s) and do not necessarily reflect the views of the U.S. Department of Justice.\*\***

# Introduction

The purpose of this model accommodations policy is to focus on the survivor and ensure that they are able to access services without barriers. This document is not meant to be distributed as a policy. It is a template that can be adapted to meet the needs of your organization and referenced as needed to provide helpful tips and considerations. It is important to remember that each person and each situation are unique and require their own personalized process.

Please note that, as a business that serves the public, all rape crisis centers are legally required to provide services, and accommodations to those services, for people with disabilities. It is a violation of the Americans with Disabilities Act (ADA) to refuse services based on the person's disability. It is also a violation of the ADA to insist on documentation or medical information to confirm a person's disability status. In addition, it is not appropriate to probe or ask for more details or seek additional information if a survivor reveals a disability. Use any question about disability only as a guide to ensure that survivors with disabilities receive appropriate and relevant services.

# Sample Accommodations Policy

## Purpose

The purpose of this document is to guide staff in best practices in providing accommodations to participants we serve. This policy is also designed to ensure that no one will be denied access to (Insert RCC) services on the basis of a disability.

## Commitment

(Insert RCC) is dedicated to offering welcoming, inclusive and accessible environments. We value safety and trust. We acknowledge, respect, and advocate for the rights of survivors with disabilities as equal citizens. We understand that accessibility is a key part of creating a space that demonstrates our values.

(Insert RCC) is committed to compliance with the American Disabilities Act and to the fair and equal treatment of all individuals with disabilities as prescribed by this law, whether they are participants, employees or volunteers. Therefore, (Insert RCC) prioritizes the rights of individuals with disabilities to have equitable access to services and to provide reasonable accommodations to those who need them. (Insert RCC) staff will make every effort to address the needed accommodations through awareness, training, and budget modifications in order to be responsive to the needs of Deaf participants and participants living with disabilities.

## Model Accommodations Policy

We commit to making our services accessible in the following ways:

- Respecting the rights, choices and equality of all survivors.
- Listen to preferences, suggestions and opinions on how to maximize access.
- Comply with the requirements of the Americans with Disabilities Act (ADA).
- Offer available accommodations to **ALL** survivors, regardless of their perceived abilities.
- Work with survivors to provide alternative accommodations when recommendations have an undue burden/hardship to our organization.
- Speak directly to survivors we are serving, even when they are supported by an interpreter, personal care attendant, support staff or family members.
- Address survivors in an age-appropriate manner.
- Allowing enough time for participants to understand and respond to questions as well as process their experiences.
- Request clarification and offer clarification when language begins to create confusion for staff or participants.
- Acknowledge and respect the sensitive nature of any information survivors might share with staff. We have private conversations in private spaces, whenever possible. We honor survivors' control of their own stories.
- Maintain a non-judgmental approach. Staff will offer survivors options and thoughtfully explore what each might mean. We will support survivors' decisions, even if we do not agree with them.
- Ensure the images we use reflect the entire community we serve, including people with disabilities.

## Model Accommodations Policy

- Believing their reports of sexual assault, domestic violence and/or human trafficking.
- Affirm each person's unique relationship to their own sexuality.
- Acknowledge that sexuality is a basic human right that is not afforded to everyone.

## Plain Language

Plain language is the act of communicating with words that are easy to understand. Plain language avoids complicated sentences and unnecessary words. Always use plain language in communication with survivors. People with various disabilities, folks that have a different first language and people experiencing trauma can all be helped with plain language.

When using plain language:

Make sure you are...

- Clear
- Direct
- Straight-forward
- Brief

Don't use...

- Hidden meanings
- Industry terms
- Abbreviations
- Baby talk

## Participant Accommodation Requests

(Insert RCC) is committed to providing effective reasonable accommodations when requested. A reasonable accommodation is any change or modification of our policies, practices or operations that can be made within a reasonable amount of time, does not cause an undue hardship, and would enable an individual with disabilities equitable access to (Insert RCC) services. Whether or not a participant has a disability may or may not be apparent. Participants are not required to disclose their disability.

# Accommodations at First Point of Contact (Hotline/Walk-in/Intake)

During a participant's first interaction with (Insert RCC), staff will explain that they will be asking questions to get information and to complete the paperwork needed to begin services. Initially, staff will ask if there is anything that they can do that will help make the process easier. It is important that staff inquire in a curious and inviting tone, as the tone one uses may impact a person's willingness to share their needs. Staff will utilize the Intake Accommodations Form.

If the needed accommodation is a personal care attendant (PCA):

Staff will work with participant on obtaining services provided by their usual PCA (as long as the PCA is not the perpetrator) or staff will assist the participant in contacting their provider agency to arrange for a PCA.

- If the participant does not have a provider agency, staff will work with the Regional Center for assistance.
- It is understood that PCA's are permitted to accompany participants in all services available through (Insert RCC), including residential shelter services.

If the needed accommodation is for a participant to have their service animal accompany them in receiving services, staff are permitted to ask **only** the following questions:

- Is the animal (dog or miniature horse) a service animal required because of a disability?
- What task(s) is the animal trained to perform for you?



## Model Accommodations Policy

### Staff **cannot**:

- Ask about the participant's disability.
- Require medical documentation.
- Require certification or documentation that the animal is a service animal.
- Ask about the equipment requirements of the service animal.

*[Insert RCC]* leadership is committed to making best efforts to acquire needed supports for participants. If an accommodation is identified and cannot be made, staff will utilize the participant as the expert and explore alternate options with the participant that may meet the need.

*[Insert RCC]* reserves the right to decline an accommodation if it is determined by leadership to be unreasonable, an undue hardship to fulfill, or negatively impacts the safety of staff and/or participants.

# Common Accommodations

Listed below is a list of common accommodations that may be offered. Note this is not a comprehensive list. It is important to utilize the participant as the expert on their needs and to be flexible in working towards meeting those needs.

### Physical accessibility

- Wheelchair access
- Grab bars in restroom
- Flexibility in where to meet
- Grab bars in shower
- Shower Seat
- Lower Bed
- Lift
- Bed Rails
- Adjustable Height Bed

### Service and support animals

- Service Animal: service dog, guide dog, signal dog, miniature horse (required by ADA)
- Emotional Support Animal: any domesticated animal, not an ADA required accommodation (e.g., cats, dogs, mice, rabbits, birds, hedgehogs, rats, minipigs, ferrets, etc.)

### Personal Care Assistants(non-offending)

- Accompany survivors while on site
- Assist with activities of daily living (e.g., eating, dressing, using the toilet, getting into or out of a chair or bed, functional mobility, personal device care, personal hygiene care)

## Model Accommodations Policy

### Interpreters

- Primary or preferred language (even if the participant knows some English)
- Sign language

### Assistive Technology

- Access to Video Phone
- Amplification Systems
- Television Captioning

### Written Information

- Translation in your primary or preferred language
- Assistance with reading, writing, or filling out forms
- Large print
- Print outs on alternative colored paper (e.g., yellow/green offers high contrast)
- Alternative spacing on documents
- Braille
- Audio
- Screen reader

### Communication

- Verbal assistance: speaking slowing, in shorter sentences, using plain and understandable terms
- Reading documentation to the participant
- Breaks to help process information
- More time to speak
- Visual aids
- Written checklists (are they safe to take home?)
- Captioned Phone

## Model Accommodations Policy

### Comfort

- Reduced noise and/or distractions
- Sensitivity to chemicals or specific smells
- Quiet or “safe room” to use for calming
- Clear view of door or exit
- Shades or curtains closed/open
- Room with no windows
- Prefer not to sit with back toward the door
- Prefer not to have the door open/closed
- Preference of staff gender
- Varied seating options (with/without armrests, couches, back support/pillows, seating height & width)

### Lighting

- Natural light
- Low or dim lighting
- Non-fluorescent lighting
- Reduced window glare
- Wearing sunglasses in rooms that cannot be dimly lit

### Sensory/Stimulation

- Earplugs or noise-muffling headphones
- Stim or fidget toys (e.g., something to shake, something to squeeze, something to spin, something to watch, something that lights-up)
- Weighted vests or blankets
- Alternative seating (e.g., exercise ball, stand-up desk, floor mat)
- Advanced warning of loud noises like bells, or planned fire alarms

### Timing of Sessions

- Modify length of sessions
- Modify frequency of sessions

# Employee/Volunteer Accommodation Requests

*[Insert RCC]* is committed to providing reasonable accommodations when requested by qualified individuals who are seeking employment or are currently employed at (Insert RCC). (Insert RCC) staff is expected to follow the procedures as outlined below.

1. When an applicant/employee/volunteer requests an adjustment or change in their working/employment environment for a reason related to a medical condition or disability, administration will speak with the applicant/employee/volunteer to inquire what the individual needs and to explore the appropriate reasonable accommodation\*
2. When the disability and/or the need for accommodation is not visible, the employer may ask the qualified applicant\*\* for reasonable documentation about their disability and functional limitations.
3. If the accommodation request does not fall within the ADA (Americans with Disabilities Act) reasonable accommodations guidelines and (Insert RCC) deems it as an undue hardship to fulfill, alternative options will be explored that are in line with the original accommodation request.
4. If the request for accommodations is considered reasonable, then this request will be responded to within 3 days. If it will take longer than 3 days to provide the accommodation, administration will work with the individual on a workaround **until** the requested accommodation can be provided.

# Glossary

\*Reasonable accommodation – modification or an adjustment to a job or the work environment that will enable a qualified applicant or employee with a disability to participate in the application process or to perform essential job functions. Reasonable accommodation also includes adjustments to assure that a qualified individual with a disability has rights and privileges in employment equal to those of nondisabled employees.

<http://www.eeoc.gov/facts/adaqa1.html>

\*\*Qualified applicant – person with a disability who meets legitimate skill, experience, education, or other requirements of an employment position that they hold or seek, and who can perform the essential functions of the position with or without reasonable accommodation. Requiring the ability to perform essential functions assures that an individual will not be considered unqualified simply because of inability to perform marginal or incidental job functions. If the individual is qualified to perform essential job functions except for limitations caused by a disability, the employer must consider whether the individual could perform these functions with reasonable accommodation.

<https://www.eeoc.gov/laws/guidance/ada-questions-and-answers>

Notice – portions of this document have been adapted from the HEAL of Tri-County Services Empowering Rights of Victims (SERV) Accommodations Policy & Procedures.



A ValorUS and  
Arc of California Project