

**DEPARTMENT OF HUMAN SERVICES
FAMILY SERVICES ADMINISTRATION**

**PUBLIC NOTICE OF SECOND REVISED COMPREHENSIVE PHYSICAL
ACCESS PLAN**

**District of Columbia Second Revised Comprehensive Physical Access Plan for
Accessibility of the District's Homeless Shelter Program to Individuals with
Disabilities Under Title II of the American Disabilities Act of 1990 Prepared in
Accordance with the Requirements of US Department of Justice Settlement
Agreement (DJ #204-16-96) between the District of Columbia, Effective December
10, 2008**

The District of Columbia Department of Human Services Family Services Division, in coordination with the District of Columbia Department of Real Estate Services and the District of Columbia Office of Disability Rights, prepared a Second Revised Comprehensive Physical Access Plan, dated January 31, 2011 (Comprehensive Plan), in accordance with Paragraph 20(i) of the United States Department of Justice Settlement Agreement (DJ #204-16-96) between the District of Columbia, effective December 10, 2008.

The District of Columbia welcomes public comments and suggestions to achieve a more fully accessible Homeless Shelter Program under the Comprehensive Plan attached to this Notice below. The Comprehensive Plan shall also be posted on the District of Columbia's Department of Human Services' website at <http://dhs.dc.gov>. All persons who desire to comment on the Comprehensive Plan should submit their comments in writing to Deborah A. Carroll, Interim Director, District of Columbia Department of Human Services, 64 New York Avenue, N.E., Washington, D.C. 20002, Attn: Mr. Fred Swan, Administrator, Family Services Administration.

Comments may also be submitted to the United States Department of Justice to: David W. Knight, Trial Attorney, Disability Rights Section – NYA, 950 Pennsylvania Ave., NW, Washington, DC 20530, E-mail: david.w.knight@usdoj.gov, Fax: 202-307-1197.

For more information about obtaining a copy of the draft Comprehensive Plan please contact by telephone or email:

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District of Columbia Department of Human Services
Second Revised Comprehensive Plan
For Accessibility of Homeless Shelters
January 31, 2011

This Comprehensive Plan sets out the District of Columbia’s strategy for ensuring that the District of Columbia’s Homeless Services Program, which is made up of a continuum of shelter services, are accessible in accordance with the Settlement Agreement between the United States and the District of Columbia under the Americans with Disabilities Act (ADA) (DJ # 204-16-96).

The goal of this Comprehensive Plan is to achieve “program accessibility” under title II of the ADA. For purposes of the Settlement Agreement, program accessibility is measured by the ADA Accessibility Guidelines (ADAAG) section 9.5.2(2), unless meeting the standard would constitute a fundamental alteration of the program, an undue hardship on the District, or would be technically infeasible.

The District of Columbia welcomes public comments and suggestions to achieve a more fully accessible Homeless Shelter Program under the Comprehensive Plan. The Comprehensive Plan shall be posted on the District of Columbia’s Department of Human Services’ website at <http://dhs.dc.gov>. All persons who desire to comment on the Comprehensive Plan should submit their comments in writing to Deborah A. Carroll, Interim Director, Department of Human Services, 64 New York Avenue, N.E., Washington, D.C. 20002, Attn: Mr. Fred Swan, Administrator, Family Services Administration. A copy of the Second Revised Comprehensive Plan may be obtained through the DHS website, or by writing to the above address, or by calling the Department of Human Services at (202) 671-4200.

The District of Columbia Homeless Shelter Program

A. The Homeless Shelter Programs

The District of Columbia, through the Department of Human Services (DHS) offers three shelter programs for individuals—severe weather shelter, low barrier shelter and temporary and two shelter programs for families—severe weather shelter and temporary shelter as described below.

Severe weather shelter: A public or private building that the District makes available to individuals or families who are homeless and cannot access other housing arrangements when *hyperthermic* conditions (the actual or forecasted temperature, including the heat index, rises above 95 degrees Fahrenheit) or *hypothermic* conditions (when the actual or forecasted temperature, including the wind chill factor, falls below 32 degrees Fahrenheit) occur.

Low barrier shelter: An overnight communal housing accommodation for individuals who are homeless without imposition of identification, time limits, or other program requirements.

Temporary shelter: A communal housing accommodation for individuals who are homeless that is open at least 12 hours each day; and a 24 hour private room or apartment-style housing accommodation for families who are homeless. Temporary shelters for individuals or families may have special eligibility requirements for the purpose of limiting entry into the program to individuals or families exhibiting the specific challenges that the program is designed to address.

B. Non-Shelter Services and Programs

The homeless shelter program offers the following non-shelter services at all locations for each type of shelter program as noted in the chart below:

	Non-Shelter Service		
Shelter Category	Food Service	Case Management Services*	Referrals
Severe Weather	<p><u>Individuals:</u> Dinner meal and snacks served nightly, and snacks served daily during hypothermia alerts at shelters for individuals.</p> <p><u>Family:</u> Three meals and snacks served daily at family shelters.</p>	Assessment, case planning, service planning, referrals, and housing assistance. These services are voluntary for clients.	<p>Medical</p> <p>Mental Health</p> <p>Substance Abuse</p> <p>Educational</p> <p>Employment</p> <p>Financial</p> <p>Housing Assistance</p>
Low Barrier	<p><u>Individuals:</u> Dinner meal and snacks served nightly, and snacks served daily</p>	Assessment, case planning, service planning, referrals, and housing assistance. These services are voluntary for clients.	<p>Medical</p> <p>Mental Health</p> <p>Substance Abuse</p> <p>Educational</p> <p>Employment</p> <p>Financial</p> <p>Housing</p>

	during hypothermia alerts.		Assistance
Temporary	<p><u>Individuals and non-apartment style family shelter:</u> Dinner meal and snacks served nightly, and snacks served daily during hypothermia alerts at 12-hour shelters. Two meals and snacks served daily at 24-hour shelters.</p> <p><u>Family:</u> Where temporary family shelter is apartment style, there are no food services provided.</p>	Assessment, case planning, service planning, referrals, and housing assistance. These services are mandatory for clients.	Medical Mental Health Substance Abuse Educational Employment Financial Housing Assistance

*Case management services are provided by social service professionals that work one on one with individuals and families within the District of Columbia’s Continuum of Care to connect them to needed services, including medical services, mental health services, substance abuse services, employment services and housing programs/services.

C. Shelter Transportation Services

The District provides extensive transportation services for individuals and families who are homeless to help them connect to shelter services. For individuals, there are two types of transportation services provided, scheduled and unscheduled. Scheduled

transportation for men and women consists of planned pick-ups from centralized locations (mainly in the downtown area) that take them to specific severe weather and low barrier shelters each evening. Additionally, transportation is provided in the mornings from these same shelters to specified locations in the downtown area and to food and day programs. This service is provided 7 days a week, 365 days a year.

Unscheduled transportation for men and women consists of pick-ups from various street and program locations to designated shelters upon client request. Also, transportation is provided upon request from shelters to non-shelter program locations and other centralized locations in the downtown area. This service is provided from 8am until 12am, 7 days a week between April 1st and October 31st. Between November 1st and March 31st, this service is provided 24-hours a day, 7 days a week.

For families, unscheduled transportation is provided from the Virginia Williams Family Resource Center (VWFRC) to family shelters and back to the VWFRC as needed or as requested by VWFRC staff for the purpose of completing intake and making shelter placements and other referrals. This service is provided from 8am until 5pm, 7 days a week, 365 days per year. Additionally, unscheduled transportation from street locations to severe weather shelter is provided for families upon request from 5pm until 7am between November 1st and March 31st on hypothermia alert nights.

There are a total of eight buses/vans that are utilized for transportation services. There are two accessible vans that provide transportation for persons with physical disabilities to ensure equal access to transportation services. For accessible transportation during the scheduled transportation service for individuals in the mornings and evening, clients may request accessible transportation for pick-ups and drop-offs at the designated pick-up and drop-off areas as needed. As those that need accessible transportation generally stay at the designated accessible shelters, and there are several runs made during the scheduled transportation timeframe each morning and evening, these vans are able to accommodate the need for accessible transportation on a daily basis. The two accessible vans are available and utilized throughout the remainder of the day and/or evening for accessible unscheduled transportation service for individuals and families, in the same manner as the other buses and vans are utilized.

The District is currently seeking additional buses or vans to increase its transportation options and is giving priority to those that provide accessibility.

I. Comprehensive Shelter Accessibility Plan

The goal of the Comprehensive Plan is to maximize accessibility throughout the homeless shelter program through the following strategies, where feasible:

- (1) Providing multiple accessible facilities within the same program type;
- (2) Providing accessibility in facilities that provide multiple shelter program types;

(3) Providing accessibility in facilities that offer the highest level of program services and amenities; and

(4) Providing accessible transportation.

A. Accessible Shelter Beds or Units

The Excel chart accompanying this Plan, Attachment A, identifies the number of beds at each shelter location by program, the number of accessible beds/units the District plans to make accessible at that location, and the date the accessible beds or units will be available under the Plan.

B. Location of Accessible Shelter Beds or Units

The attached Excel chart identifies for each homeless shelter program the provider name, shelter address, summary of services offered, and the total number of beds or units at each location. In addition the chart identifies those shelter locations that, when the Comprehensive Plan is completed, will be accessible for persons with disabilities and compliant with the terms of the Settlement Agreement.

For the shelter locations identified as accessible upon completion of the Comprehensive Plan, the chart identifies what the total accessible capacity will be, the minimum number of accessible beds or units that will be reserved at that location, and the date that the modifications under the Comprehensive Plan are expected to be completed.

C. Modifications to Shelter Facilities to Meet Comprehensive Plan Goals

The following modifications have or will be completed in accordance with the schedule below, absent a finding that the modification would result in a fundamental alteration of the program, an undue hardship on the District, or would be technically infeasible:

801 East Shelter – 801 Making Life Better Lane, SE

801 East Shelter provides Severe Weather shelter for 110 men and Low Barrier shelter for 260 men. This shelter houses approximately 24% of the population of men needing Severe Weather shelter services and approximately 27% of the population of men needing Low Barrier shelter services. 801 East is a housing assistance center offering severe weather, low barrier and Transitional Rehabilitative services for men.

The District of Columbia is developing a new shelter facility on the St. Elizabeth's campus to replace the existing shelter. The new shelter will be constructed to comply with accessibility standards, and is expected to open during calendar year 2012. In addition to the shelter and other supportive services currently offered at the 801 East shelter, the new facility is being designed to provide additional services to provide a comprehensive program to shelter clients. The specific program components are to be finalized as part of the DHS system redesign currently underway.

Currently, 801 East shelter has the capacity to provide accessible Severe Weather shelter for up to twenty-one (21) men, with a minimum of fourteen (14) accessible severe weather beds designated on an on-going basis. Also, 801 East currently has the capacity to provide accessible Low Barrier shelter for up to thirty-two (32) men, with a minimum of thirty-two (32) accessible beds designated on an on-going basis.

The following modifications have been completed:

- Installation of “van accessible” signage at 3 accessible parking spaces
- Provision of signs at inaccessible toilet/shower rooms directing people to the accessible toilet/shower rooms)
- Replacement of elevator emergency intercom system with a hands-free system and compliant door
- 46 beds (individual beds or lower bunks) designated as accessible, providing 32” clearance on both sides
 - 14 Severe Weather
 - 32 Low Barrier
- Provision of 46 accessible storage lockers
- Telephone has been lowered
- Although ADAAG does not include a requirement for height of bulletin boards, some bulletin boards have been lowered.

To increase accessibility until the new shelter facility is constructed, the District will make the following improvements in FY 2011:

- In the wider toilet stall, change the flush control valve from the narrow side nearest the wall to the wider side of the toilet area.
- In the wider toilet stall, install coat hook.
- Decrease the unramped accessible route to the shower transfer seat.
- Install a shower spray unit that allows for both fixed and handheld use.
- Ensure accessible lockers have shelves.
- Ensure accessible locks are available for use upon request.

Federal City Shelter – 425 2nd St. NW

Federal City shelter provides Severe Weather shelter for 125 men, Severe Weather shelter for 105 women, Low Barrier shelter for 206 women, and Temporary shelter for 18 women. Federal City houses 27% of men needing Severe Weather shelter, 72% of women needing Severe Weather shelter, 71% of women needing Low Barrier shelter, and 21% of women needing Temporary shelter.

Federal City Shelter provides severe weather, low barrier and transitional shelter and supportive services. Federal City Shelter has been temporarily designated as the accessible shelter for men needing Severe Weather shelter (Lower Level) and Temporary shelter services (Level 1); and for women needing Severe Weather, Low Barrier, and Temporary shelter services (Level 2).

Upon completion of this Comprehensive Plan, Federal City will provide accessible Severe Weather shelter for up to thirteen (13) men with at least seven accessible beds designated on an on-going basis; accessible Severe Weather shelter for up to ten (10) women with at least seven (7) accessible beds designated on an on-going basis; accessible Low Barrier shelter for at least up to ten (10) women with at least five (5) designated on an on-going basis; and accessible Temporary shelter for up to twenty (20) men with at least thirteen (13) accessible beds designated on an on-going basis.

- Toilet/shower rooms on Levels 1 and 2 and 3 will be renovated during Phase II construction to meet accessibility requirements, to be completed February 2011:
- Interior door opening force – Door opening force has been adjusted where it does not require replacement of the door. Staff will assist with opening doors when needed.
- A text telephone (By Provider)
- 21 designated accessible beds (Temporary Men's) have been provided on Level 1 with 32" clear space on each side (will be reduced to 13 when modifications to Emery Shelter are completed)
 - Provider responsibility
- 7 accessible beds (Severe Weather Men's) will be provided on Level 1 with 32" clear space on each side (completed)
- 21 accessible storage areas have been provided on Level 1
- 20 accessible beds have been provided on Level 2
 - 7 Severe Weather Women's;
 - 8 Low Barrier Women's;
 - 5 Temporary Women's
 - Provider responsibility
- 20 accessible storage areas have been provided on Level 2
- 1 space on the unstriped lot has been designated as reserved for people with disabilities by addition of a sign
 - Provider responsibility
- Level landing and maneuvering clearance cannot be provided at the entrance door because it would require complete removal and extension of the ramp, and there is insufficient space. However, the main entrance door has been made automatic and activated at the ramp landing and at the lobby.
 - Completed 11/26/08

The following barriers cannot be modified because doing so would be technically infeasible or an undue hardship. Alternative methods to ensure accessibility are noted:

- Wall-mounted fire standpipe on ramp to Unity Health Care not cane-detectable – It is technically infeasible to move this standpipe. Providing a cane detectable barrier would reduce the clear width of the ramp.
- Changing toilet location is technically infeasible because it would require re-plumbing the building.
- Toilet/Shower Room in Infirmary – Residents with disabilities will be housed on Levels 1 and 2. (ODR confirmed CCNV's compliance)

- Sleeping space in Infirmary – Residents with disabilities will be housed on Levels 1 and 2. (ODR confirmed CCNV’s compliance)
- Door hardware – Office doors on Levels 1 and 2 will be blocked open or staff will be available to open doors.
- Drinking fountains – Residents with disabilities will be provided cups.
- Laundry rooms on Levels 1 and 2 – Doors will be blocked open; staff will assist residents with disabilities with laundry when needed.
- Food service line – Staff will deliver food to residents with disabilities in the dining area.

The following modifications will be made by April 2012:

- Main entrance - Handrails will be provided 34” to 38” above the ramp surface; Handrail extensions and returns will be provided;
- Remaining doors will be adjusted or replaced to ensure door opening force of 5 lbs or less and accessible opening width.
- Ramp to Unity Health Care – (Handrails provided by OPM 10/08)
- Pay Phones will be made compliant
- Parking lot – The parking lot is not owned or controlled by the District of Columbia. This is a gravel lot with no striped parking spaces. A paved route exists along the side of the parking lot to the accessible entrance. A sign will be posted beside this route to reserve the space for people with disabilities. (Provider responsibility)
- A text telephone by Provider.

New York Avenue Shelter - 1355-1357 New York Ave. NE

New York Avenue is a housing assistance center offering severe weather, low barrier and Wrap-Around services for 360 men. It serves approximately 34% of men needing Temporary shelter services. New York Avenue Shelter also provides Temporary shelter for 12 men, representing approximately 2% of the men needing Temporary shelter services.

The modifications to the following areas were completed in 2009, providing accessible shelter capacity for up to twenty-four (24) men, with a minimum of sixteen (16) accessible beds reserved:

- Striping of one (1) accessible parking space with signage
- Toilet/Shower Rooms
- Thresholds beveled on all accessible routes.
- Accessible door hardware installed on all accessible interior entrances.
- Door opening force on accessible doors adjusted or doors replaced.
- Provide 16 accessible beds be provided.
- Provide 16 accessible storage areas.
- Visual fire alarms relocated and adjusted to appropriate height.
- Installation of a new ramp and landing that meets accessibility guidelines.

Emery Shelter - 1725 Lincoln Road, NE

Emery Shelter provides Temporary shelter services to 100 men. Emery serves approximately 16% of men needing Temporary shelter services. Emery Shelter provides temporary housing accommodation and supportive services to working men. The shelter is located near one block from a major bus route and approximately ½ mile from the New York Avenue Metro Station. Both Metro buses and trains are fully accessible to persons with disabilities.

Renovations at the Emery Shelter were completed in FY 2009 and provide accessible Temporary Shelter to up to ten (10) men with at least seven (7) accessible beds designated on an on-going basis.

The following modifications were completed in 2009:

- Striping of one (1) accessible parking space with signage.
- Addition of an accessible entrance.
- Elevator installed to provide access to all floors. This provides access to common areas, including the sleeping areas, dining area, laundry room, and clinic.
- A separate laundry facility within the basement bathroom is provided.
- Toilet Rooms on basement level and 1st floor.
- Accessible shower Rooms on the 1st floor and basement level.
- Detectable posts have been installed on exterior air conditioning cages on 4 windows at circulation paths.
- A lowered counter in the reception area will be provided.
- Doors will be made accessible (including door opening force, clear opening width, and door hardware).
- Compliant door hardware will be installed throughout the facility.
- Visual fire alarms will be adjusted to appropriate height.
- 7 accessible beds will be provided.
- 7 accessible storage areas will be provided.

Madison Shelter – 651 10th Street, NE

Madison Shelter provides Temporary shelter for 39 women. Madison Shelter for women provides temporary housing accommodations and supportive services. Upon completion of this Comprehensive Plan, Madison Shelter will provide accessible Temporary shelter for at least five (5) women.

The following modifications will be completed by January 2012:

- An accessible sloped walk entrance will be provided on G Street at grade.
- An elevator will be installed, providing access to the Basement and 1st floor, including to sleeping areas, kitchen, dining areas, and laundry facilities.
- Toilet/Shower Rooms
 - An accessible toilet/shower room will be provided at the 1st floor dorm area.

- An accessible toilet room will be provided on the basement level.
- Accessible door hardware will be provided on accessible routes.
- Door to laundry room will be replaced to provide clear opening width.
- Visual alarms will be adjusted to appropriate height.
- 5 accessible beds will be provided.
- 5 accessible storage areas will be provided.

The following barriers will not be removed because they would be technically infeasible or would constitute an undue hardship. Alternative methods to ensure accessibility are noted:

- The 2nd floor will not be on the accessible route or have accessible spaces or elements. Individuals with disabilities will be housed on the 1st floor.

Accessible Family Shelter

The District’s Shelter Program currently utilizes the D.C. General Family Shelter for Severe Weather Shelter for Families. The D.C. General Family Shelter is located in two buildings – the main building and building #12. In the main building, the District is has completed an accessible bathroom including an accessible shower on both floor #4 and floor #5. These accessible bathrooms are available for use by any person who needs accessible features due to disability. Each floor provides shelter for up to 35 families. In addition, at least three units on each floor will have an accessible half-bath in the family unit. As such, D.C. General can reasonably provide accessible severe weather family shelter for up to twenty-five (25) families.

For temporary family shelter, the District has identified the following shelter locations or units to ensure accessible temporary family shelter is available for families that need wheelchair accessible placements.

Girard Street Temporary Family Shelter

The family shelter located at 1413 Girard Street, NW provides 16 temporary shelter units. Upon completion of the Comprehensive Plan, the District will be able to offer up to 2 accessible units – one three bedroom unit and one two bedroom unit.

Scattered Site Temporary Family Shelter Units

In addition to the District’s site-based temporary family shelter locations, the District offers accessible family shelter at scattered site apartment units. The District owns two units located on Kramer Street and Corcoran Street N.E., and, in partnership with its managing contractor, The Community Partnership for the Prevention of Homelessness (TCP), the District provides a number of additional accessible scattered site apartment units as part of its temporary family shelter program.

1626 Kramer Street, N.E. and 1881 Corcoran Street, N.E.

The District will make the following improvements in FY 2011 to the Kramer and Corcoran Street properties to ensure accessibility:

1626 Kramer Street, N.E.

- Accessible laundry machines on upper level, including install plumbing.
- Outer elevator door to require no more than five pounds of force to open.
- Accessible bathroom and shower.
- Accessible kitchen.

1881 Corcoran Street, N.W.

- Accessible knobs on the oven and dishwasher.
- Accessible front door exterior landing.
- Accessible elevator hardware.
- Accessible bathroom with a shower.
- Accessible back entrance ramp and handrail.
- Thermostat height lowered.

The following six (6) privately-owned accessible units secured in partnership with TCP are currently available for the Temporary Family Shelter Program. The address locations are:

- 3134 Buena Vista Terrace, S.E. #1, Washington, D.C. 20020
- 3130 Buena Vista Terrace, S.E. #2, Washington, D.C. 20020
- 4953 G Street S.E., #B1, Washington, D.C. 20019
- 4954 G Street S.E., #B2, Washington, D.C. 20019
- 4955 G Street S.E., #B3, Washington, D.C. 20019
- 4956 G Street S.E., #B4, Washington, D.C. 20019

Domestic Violence Shelter for Women with Children

My Sister's Place, one of the District's current domestic violence providers, has recently opened a newly renovated shelter that can serve up to 45 families. The common areas of the building are accessible and three out of the five suites are accessible. Each "suite" contains 3 family bedrooms/units. Therefore, the facility is designed to serve up to nine (9) families that need ADA accessible units. The District currently contracts (through its management contractor, The Community partnership for the Prevention of Homelessness (TCP), for 10 shelter units from My Sister's Place. TCP is currently in the process of amending the My Sister's Place contract to ensure that the District can utilize any of the units in its inventory (including the nine accessible units) when a family is referred from the District's Virginia Williams Family Resource Center for shelter, including the accessible units.

Youth Shelter

The District currently funds three providers who deliver services specifically for youth between the ages of 12 and 24. These services consist of temporary shelter for single youth and families with children. Shelter is provided through scattered sites apartment units leased from private landlords. This allows the program the flexibility to identify an accessible unit for those applicants who need accessibility. When a client presents for youth shelter who is in need of an accessible unit, the provider will lease an ADA accessible unit on the private market to accommodate them. The District will provide additional resources when necessary to facilitate the lease of an ADA accessible unit. District, as well as federally funded housing programs, allow for an increase in rental subsidy payments (above the rent reasonableness determinations) for units that meet ADA standards.