



**PROPOSED SECTION 504
BUSINESS PROCESS VISION
TO PROVIDE INDIVIDUALS WITH DISABILITIES
MEANINGFUL ACCESS TO
SOCIAL SECURITY PROGRAMS AND ACTIVITIES**

Version: 3.1

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Executive Summary

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination against individuals with disabilities and requires Federal agencies and recipients of Federal financial assistance to provide meaningful access to their programs and activities to individuals with disabilities. Section 504 protects “qualified individuals with disabilities,” as defined in 45 CFR Part 85 as “persons with a physical or mental impairment that substantially limits one or more major life activities.”

The Section 504 process aligns closely with our mission and core service values, including:

- Adhering to the law;
- Delivering Social Security services that meet the changing needs of the public; and
- Providing the highest standard of considerate and thoughtful service to all customers.

Any individual with a disability may request an accommodation that facilitates meaningful access to our programs and activities under Section 504. We intend to provide accommodations based on five broad categories of impairments: Blind or Visually Impaired, Cognitive or Learning, Deaf or Hard of Hearing, Mobility or Physical, and Psychological or Emotional. However, individuals who have other types of disabilities that prevent them from having meaningful access may request an accommodation that facilitates meaningful access to our programs and activities under Section 504.

It is important to note that a decision to provide accommodations when requested does not constitute an allowance for Social Security benefits or acknowledgement of disability for administering Social Security programs.

Beginning in 2010, the Social Security Administration (SSA) convened a cross-component workgroup to conduct an evaluation of our Section 504 activities. The workgroup found that, although we routinely provide accommodations to the public on an as-needed basis, we had no national guidance explicitly outlining Section 504 principles, regulatory requirements, or operating procedures.

The workgroup made the following recommendations:

- Establish a Center for Section 504 Compliance;
- Develop and disseminate a comprehensive Section 504 policy;
- Implement a Section 504 standard business process;
- Conduct Section 504 training for all employees;
- Develop and implement a multi-media communication plan; and
- Develop a plan for long-term Section 504 compliance and continuous improvement.

This document presents the agency’s vision for the future to ensure that we provide every member of the public an equal opportunity to participate in our programs and services.

Purpose

In 1995, SSA became independent from the Department of Health and Human Services (HHS). By operation of law, the Section 504 regulations that HHS had in effect at that time remained our regulations and will continue to apply until we adopt our own regulations. In 2010, our Commissioner decided the agency should conduct a self-evaluation and draft SSA-specific regulations to ensure we comply with Section 504. We are in the process of drafting SSA-specific regulations. This document contains our vision for future Section 504 activities.

Our employees are service oriented and routinely accommodate customers so that the customers may access our programs and services. Our employees perform this function on an as-needed basis, in real time, with limited formal guidance, and no automation. We intend this document to present our vision for better administering accommodations to the public. This vision strives to achieve balance in assessing whether an accommodation is feasible with the reality of serving the public with diminishing resources, ever-increasing workloads, and increasing security threats.

This document is the first iteration in an ongoing process. We expect that as technology improves over time and as we implement and change our business processes, we will modify the policy and procedures we use to receive and act on requests for accommodations, and we will continue to review the assistive devices we use to communicate with members of the public. We intend to establish metrics and modify them as needed to measure the ongoing effectiveness of our Section 504 compliance.

Rationale

Currently, we do not have one comprehensive policy addressing Section 504 requirements. (See Appendix A for our current business process.) Employees follow interviewing guidelines and other procedures that embody Section 504 principles. However, these procedures often are case specific and described in terms of individual disabilities, rather than a set of guiding principles and practices for consistent application.

We have documented procedures for handling requests for accommodations from individuals who are blind or visually impaired and from those who are deaf or hard of hearing. We process most other requests for accommodations from the public locally and on a case-by-case basis. We rely on our employees to determine which accommodations to provide and when. When a request is not satisfied locally, we may receive an administrative complaint of program discrimination based on disability. Our Office of the General Counsel (OGC) receives, investigates, and decides these complaints.

Scope

Our core mission is to serve the public. Effectively handling accommodations under Section 504 of the Rehabilitation Act of 1973 affects all our employees who serve our customers. We intend to implement this vision of a revamped Section 504 process to better serve the American people.

This document does not address the process for providing accommodations under Section 501 of the Rehabilitation Act of 1973 as a means to equal and meaningful employment. A description of our Section 501 policy is available at [www.socialsecurity.gov/eo/Reasonable Accommodation Procedures/](http://www.socialsecurity.gov/eo/Reasonable_Accommodation_Procedures/). Nor does this document describe the process for providing meaningful access through information and communications technology under Section 508. Information about our Section 508 policy is available at www.socialsecurity.gov/accessibility/508_overview.html.

Stakeholders

We consider the following entities to be stakeholders as we prepare our vision for Section 504 activities:

External

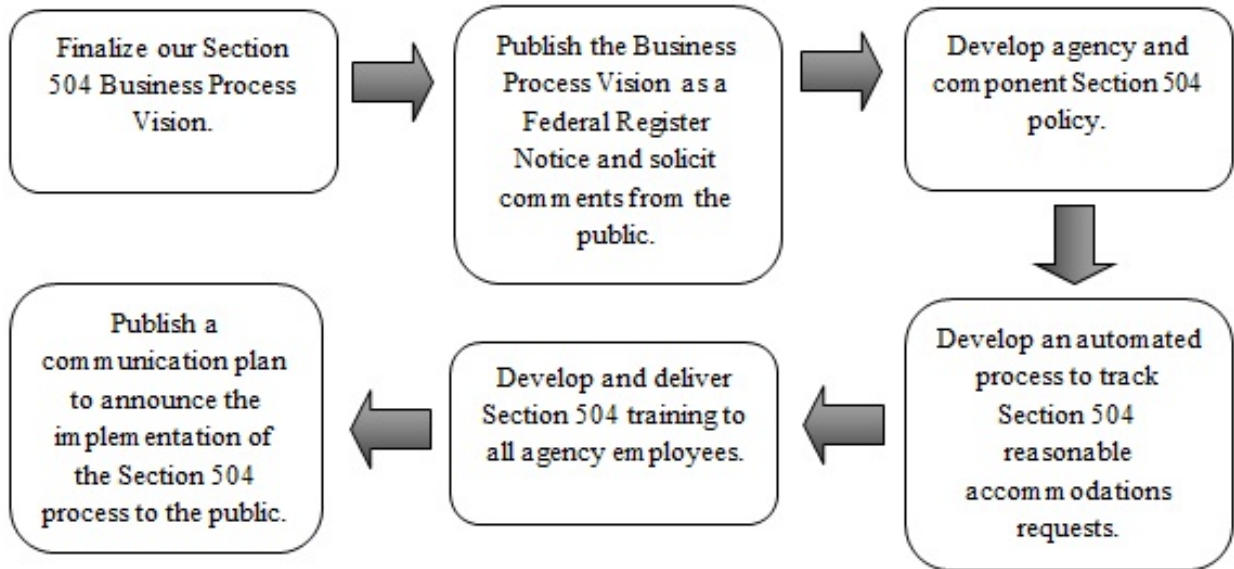
- Individuals with disabilities
- Advocates for individuals with disabilities

Internal

- Office of the Commissioner
- Agency Level Offices (OGC, Office of the Chief Actuary, and Office of the Inspector General)
- Office of Budget, Finance, Quality and Management
- Office of Communications (OCOMM)
- Office of Disability Adjudication and Review
- Office of Human Resources
- Office of Legislation and Congressional Affairs
- Office of Operations
- Office of Retirement and Disability Policy
- Office of Systems (OS)

Business Process Flow Chart

The diagram below shows the steps we have identified to implement our Section 504 activities:



Section 504 plans to Finalize the 504 Business Process Vision then Publish the Business Process Vision as a Federal Register Notice. Once published, comments from the public will be solicited. Then the Section 504 Policy for the Agency will be developed. After that, an automated process to track 504 requests for Reasonable Accommodations will be developed. Training about 504 will be developed and delivered to all Agency Employees. Finally, a communication plan will be published to announce the implementation of the Section 504 to the public.

Business Process Vision

This vision outlines our proposed business process to establish policies and procedures to provide individuals with disabilities *standard* accommodations and to consider requests from individuals with disabilities for *nonstandard* accommodations. A nonstandard accommodation may apply when an individual with a disability believes that a standard accommodation is insufficient to provide meaningful access to Social Security programs, services, or facilities. (Appendix B illustrates the workflow for administering requests for standard and nonstandard accommodations.)

By providing accommodations to members of the public who need them, we ensure the right to an equal opportunity to participate in, and have meaningful access to, our programs and services. To provide effective communication, the accommodations we make include, but are not limited to, providing qualified sign language interpreters, providing accessible electronic and information technology, and producing notices and publications in alternate formats. Other ways we make information accessible include using plain, easy-to-understand language, repeating

information, and providing additional time to complete interviews. Examples of program modifications we offer are excusing untimely responses, upon request, based on the individual's disability. Accommodations also could include offering alternate service delivery options when requested, such as conducting business with us online or by telephone.

As stated above, we currently attempt to accommodate most individuals through standard accommodations upon request. These standard accommodations can be auxiliary aids or they can be a method of interacting with a customer who has a disability. Such accommodations do not require special handling or approval by a manager. Through future systems changes, we are planning to document the request for accommodation and retain it in our records to ensure that when the customer contacts us again, we know that he or she previously requested a particular accommodation. When implemented, these systems changes will improve our service to the public because an individual will no longer need to make us aware, on a recurring basis, of his or her need for an ongoing accommodation.

When one of these standard accommodations is insufficient to facilitate meaningful access, we will attempt to provide another accommodation that will be effective. Individuals have the right to request a nonstandard accommodation (i.e., a specific auxiliary aid or service requested by an individual with a disability that the agency does not currently provide with regularity). Our vision is that a headquarters-based component, our Center for Section 504 Compliance (Center), will evaluate and decide requests for nonstandard accommodations to ensure that the agency considers all such requests consistently. Additionally, the Center will oversee the strategic and tactical aspects of implementing our Section 504 activities (see Appendices C and D).

Requesting Accommodations

In order to communicate the right to accommodations based on disability under Section 504, public notice will be visible in all offices, online, and available in alternate formats when requested. Public notice will include the list of standard accommodations we provide.

An individual with a disability may contact us in person, via telephone by calling 1-800-772-1213 or Text Telephone (TTY) 1-800-325-0778, or online at www.socialsecurity.gov/accessibility/. Individuals who are blind or visually impaired may request notices in an alternate format online at www.socialsecurity.gov/notices/.

Employees will receive policy guidance and training to understand whether the requested accommodation is a standard accommodation, or whether the individual is requesting a nonstandard accommodation.

We also plan to automate the process to receive, review, decide, track, and monitor requests for the consistent administration of accommodations. We envision using automated tools to support the request, receipt, and processing of both standard and nonstandard accommodations, with supporting management information and workload control.

Administering Requests for Standard Accommodations

We will issue policies that present the requirements imposed by Section 504 as well as the procedures we will follow to implement them. Employees will be able to access Section 504 procedures using PolicyNet, our internal repository for reference materials. In addition to including the new Section 504 guidance in our policy and procedures manuals (i.e., our Program Operations Manual System (POMS) available at <https://secure.ssa.gov/apps10/>), we will cross-reference and cluster related references for ease of access. Our Office of Data Exchange and Policy Publications will be responsible for ensuring employees have immediate access to comprehensive and consistent electronic policy instructions.

Employees will receive periodic training and annual reminders related to Section 504 and providing accommodations. Employees will communicate our Section 504 policy to the public, including the information that individuals may request an accommodation at any time by logging on to www.socialsecurity.gov/accessibility or calling toll free at 1-800-772-1213, or TTY at 1-800-325-0778.

When an individual indicates a need for assistance or requests an accommodation, employees will offer the appropriate standard accommodations and enter information about the request into the automated system. To record a Request for Accommodation, employees will gather the following information:

A. Requestor Information

- Name
- Date of request
- Social Security number
- Address
- Phone number

B. Condition that causes the individual to request an accommodation(s)

C. Accommodation(s) requested

1. Blind or Visually Impaired

- a. Service online, by telephone, or in office
- b. Special interviewing techniques described in POMS [DI 11005.070](#)
- c. Standard print notice by certified mail
- d. Standard print notice by first-class mail with a follow-up telephone call
- e. Large print (18-point font size) notice and a standard print notice by first-class mail
- f. Braille notice and a standard print notice by first-class mail
- g. Audio compact disc (CD) and a standard print notice by first-class mail

- h. Microsoft Word file on a data CD and a standard print notice by first-class mail
- i. More time to provide information (when good cause is shown)

2. Cognitive or Learning

- a. Service online, by telephone, or in office
- b. Special interviewing techniques described in POMS [DI 11005.076](#)
- c. Standard print notice by first-class mail with a follow-up telephone call
- d. Audio CD and a standard print notice by first-class mail
- e. Referral to local advocates or counseling resources
- f. More time to provide information (when good cause is shown)
- g. Help from a representative payee or other third party

3. Deaf or Hard of Hearing

- a. Service online, by TTY, or in office with qualified sign-language interpreter
- b. Special interviewing techniques described in POMS [GN 00203.012](#)
- c. UbiDuo device
- d. Handwritten notes
- e. Qualified sign-language interpreter
- f. More time to provide information (when good cause is shown)

4. Mobility or Physical

- a. Service online, by telephone, or by videoconferencing
- b. Help with filling out forms
- c. More time to provide information (when good cause is shown)

5. Psychological or Emotional

- a. Service online, by telephone, or by mail
- b. Special interviewing techniques described in POMS [DI 11005.076](#)
- c. Standard print notice by first-class mail with a follow-up telephone call
- d. Audio CD and a standard print notice by first-class mail
- e. Referral to local advocates or counseling resources
- f. More time to provide information (when good cause is shown)
- g. Help from a representative payee or other third party

Currently, for individuals who are blind or visually impaired, employees input requests for notices in special format using SSA's Internet Special Notice Options (iSNO) application at www.ssa.gov/notices/, per POMS [NL 01001.100](#). We intend that the new automated system will receive an individual's request for any standard accommodation, including special notice formats. The system will store the request on an individual's record in a way that allows any employee who assists the individual to see the requested accommodation, the accommodation determined to be effective, and that the individual accepted the accommodation.

Administering Requests for Nonstandard Accommodations

Under Section 504, an individual with a disability has the right to request an accommodation of his or her choice. Section 504 requires SSA to take appropriate steps to ensure effective communication with and to furnish appropriate auxiliary aids or services where necessary to afford an individual with disabilities an equal opportunity to participate in and enjoy the benefits of a program or activity conducted by the agency. When an individual with a disability requests an accommodation to communicate effectively with the agency, we must give primary consideration to the individual's request unless another effective means of communication exists.

In addition to providing accommodations to ensure effective communication, we must operate each program or activity so that, when viewed in its entirety, the program or activity is readily accessible and usable by individuals with disabilities. This provision of Section 504 does not necessarily require us to make every aspect of our programs and activities accessible, but it does require us to make reasonable modifications in policies, practices, or procedures where necessary to avoid discrimination based on disability.

Our responsibility is to make an individualized assessment as to whether the individual already has meaningful access to our programs and activities, and if not, whether the lack of meaningful access is because of a disability. We will first determine whether one of our standard accommodations will provide effective communication or meaningful access. If not, we will determine whether other effective accommodations exist. In doing so, we will consider whether the requested accommodation is effective and whether we can provide it without undue administrative and financial burden or fundamental alteration of our programs or services. Employees will explain this process using a standard script. The script will include questions to help the Center:

- Determine whether the individual qualifies for an accommodation;
- Determine whether the individual requires the accommodation for one time only or on an ongoing basis;
- Understand why none of our standard accommodations would provide meaningful access;
- Determine the individual's nonstandard accommodation;
- Determine why the individual requires the specific nonstandard accommodation being requested;
- Determine whether other effective accommodations exist.

We anticipate allowing employees to use the automated system to record the request for a nonstandard accommodation. The automated system will then route the request to the Center. The Center will evaluate the request for nonstandard accommodations, decide to grant or deny the accommodation or offer an alternative accommodation if one is available, and input the decision into the automated system. The automated system will then convey the decision to the

appropriate office, and the Center will send the decision to the individual who initiated the request.

Considering Requests for Nonstandard Accommodations

Employees must offer the agency's available standard accommodations to the public and can then explore whether an individual requires a nonstandard accommodation. If individuals requesting the accommodation decline standard accommodations, they must explain why the accommodations offered are insufficient to provide meaningful access to our programs, services, or facilities.

The Center intends to use the automated system to track incoming requests for nonstandard accommodations and will review and respond to requests for nonstandard accommodations. Our goal is to respond to requests for nonstandard accommodation within 45 days from the date the Center receives the request.

Note: We may decide to decentralize the process of considering nonstandard accommodations in order to expedite decisions on accommodation requests.

In evaluating requests for nonstandard accommodations based on lack of effective communication, the Center will conduct research and obtain input from other components to determine whether to provide the requested nonstandard accommodation. We will decide whether to provide the accommodation by analyzing whether:

- We can effectively communicate with the requestor using one of our standard accommodations;
- The requested accommodation would provide effective communication;
- Any nonstandard accommodations would provide effective communication;
- Providing the requested nonstandard accommodation would result in a fundamental alteration in the nature of the program or activity; or
- Providing the requested nonstandard accommodation would result in undue financial and administrative burden to the agency.

When we disapprove a request for a nonstandard accommodation, the Center will be responsible for replying to the requestor in writing, including a rationale for the decision and offering of an alternate accommodation if available. When responding, the Center will consider the individual's disabling condition and the information available to determine whether to send the notice in a special format.

The Center will explain that while the individual has no right to appeal the agency's decision, the requestor can resubmit the request with additional information. Individuals have the right at any time to file a complaint of discrimination against the agency based on disability. Our nondiscrimination policy and complaint process is available online at www.socialsecurity.gov/accessibility/504_overview.html.

Success Criteria

We will measure our success by improved customer service to individuals with disabilities. Evaluating the success of achieving meaningful access to our programs and services requires us to collect information such as the fact of a request for accommodation, disposition of a request, customer satisfaction with the accommodation provided, and other information. We will measure customer satisfaction using surveys and studies administered by our quality review component. Additionally, we will continue to monitor the number of incoming complaints of discrimination based on disability to help us determine if we are effectively communicating our process and providing the public with effective accommodations.

Communication and Marketing

The success of our reasonable accommodation process depends on providing effective public notice of individuals' rights under Section 504. Employees are responsible for communicating Section 504 principles and providing reasonable accommodations to the public. Employees will undergo training and receive annual reminders on our Section 504 policy. We will publicize and make available to both members of the public and our employees a centralized telephone number and email box for questions and feedback about Section 504. The Center will monitor the phone line and email box.

We publish information about our Section 504 program online at www.socialsecurity.gov/accessibility, and we update our website regularly with information related to civil rights, accommodations offered to individuals with disabilities, and the process for requesting accommodations. The Center is responsible for communicating content and working with the OS and OCOMM to maintain the website. In partnership with the Center, OCOMM develops marketing materials including office signs, pamphlets, and Social Security Television segments explaining our Section 504 policy, the process for requesting an accommodation, and contact information for the Center.

Recommendations for the Center for Section 504 Compliance

Recommendations for the Center include, but are not limited to, the following:

Automation

As described above, our vision requires that we automate our Section 504 accommodation process as much as possible. It is important that we are aware of the accommodation request at the first point of contact, particularly for individuals, including claimants, beneficiaries, or their advocates or appointed representatives, who are deaf or hard of hearing and require interpreter services, which require advance notice to schedule. Ultimately, we envision allowing individuals to self-identify and request an accommodation online. The automated system will then propagate that information to customer service applications and queries for consistent administration.

The Center will sponsor automation efforts to develop a system that:

- Allows the public to self-initiate a request for an accommodation based on disability and provides a decision tree of standard accommodations the individual can select based on data entered;
- Allows employees to enter information and navigate through a simple decision tree of standard accommodations the individual can select based on data entered;
- Automates sharing data related to accommodations, including the facts, status, disposition of a request, and other information. This information will be customer-specific, subject to change, and must be visible to all employees providing service to the public through any service delivery channel;
- Provides workload management, including the ability to track a request from receipt through disposition and ongoing administration of the accommodation; and
- Provides management information and reports for the purpose of cross-component communication on agency precedents, budget formulation, capacity, and other considerations.

Appendices

Appendix A – Current Business Process

When we serve individuals with disabilities, whether in person, by video, by telephone, or through online services, we routinely provide accommodations. We also provide an opportunity to request accommodations when an individual with a disability files a complaint of discrimination and alleges that we failed to make accommodation for his or her disability. Individuals can file complaints using Form SSA-437-BK, Discrimination Complaint Form, available online at www.socialsecurity.gov/online/ssa-437.pdf.

We have documented processes for providing accommodations to individuals who are blind or visually impaired and to those who are deaf or hard of hearing. An automated Special Notice Options (SNO) process focuses on written communication for individuals who are blind or visually impaired. Alternately, the options card we provide to customers who are deaf or hard of hearing focuses on face-to-face communication. We also post signs in our offices explaining our nondiscrimination policy.

Special Notice Options - Blind or Visually Impaired

We offer a SNO process to beneficiaries who are blind or visually impaired. The Internet Special Notice Option (iSNO) application at www.ssa.gov/notices/ allows individuals to self-select their notice preferences online. If an individual indicates his or her notice preferences to an employee, the employee then enters the preference in our intranet application. The iSNO application updates our records and notice applications. It then generates notices in the individual's preferred format and documents the notice preferences in our records. Our Program Operations Manual System (POMS) [NL 01001.000](#) explains the SNO process in depth.

Options Card - Deaf or Hard of Hearing

In 2011, employees in offices providing face-to-face service began using an 11x17 inch laminated options card to illustrate the accommodations available to members of the public who are deaf or hard of hearing. POMS [GN 00203.012](#) provides special interviewing instructions and explains the process for administering accommodations to customers who are deaf or hard of hearing.

Discrimination Complaint Process

Our current discrimination complaint process provides a mechanism by which members of the public can file complaints of alleged disability discrimination. Our Office of the General Council investigates and decides allegations of discrimination based on disability in order to ensure consistent application of Section 504 and other civil rights laws. Our field offices post notice of individuals' rights under Section 504, which includes instructions and timeframes for filing a discrimination complaint, contact information for the complaints process, and a description of what happens after an individual files a complaint.

Physical Access

The framework for all Federal space policies and procedures is found in the [Code of Federal Regulations, Title 41, Federal Property Management Regulations](#) published by the General Services Administration (GSA). Specifically, 41 CFR § 102-74.445 prohibits Federal agencies from discriminating against individuals who are members of protected classes, including individuals with disabilities, by limiting these individuals' access to facilities, services, and activities.

GSA serves as the sole agent in acquiring space we occupy. GSA must adhere to the requirements of the Architectural Barriers Act, passed in 1968, which describes Federal standards for physical accessibility to buildings.

When a local office receives a complaint, employees notify our regional Center for Materiel Resources and work in partnership with regional GSA representatives or the building lessor to resolve the complaint. In situations where facilities impede meaningful access to our programs, we take measures, where reasonable, to:

- Remove the impediment;
- Alter it so that it no longer impedes access;
- Offer a means of avoiding the impediment; or
- Offer an alternative method of making the service available to individuals with disabilities.

Our Office of Facilities and Supply Management oversees construction, repairs, improvements, and maintenance to the following delegated buildings:

- SSA Headquarters, 6401 Security Boulevard, Baltimore, Maryland
- National Computer Center, 6201 Security Boulevard, Baltimore, Maryland
- Metro West, 300 North Greene Street, Baltimore, Maryland
- Security West, 1500 Woodlawn Drive, Baltimore, Maryland
- Frank Hagel Federal Building, 1221 Nevin Avenue, Richmond, California
- Harold Washington Social Security Center, 600 West Madison Street, Chicago, Illinois
- Joseph P. Addabbo Federal Office Building, 155-10 Jamaica Avenue, Jamaica, New York
- Mid-Atlantic Program Service Center, 600 Spring Garden Street, Philadelphia, Pennsylvania
- Wilkes-Barre Data Operations Center, 1150 East Mountain Drive, Wilkes-Barre, Pennsylvania

Appendix B – Proposed Plan for Requesting Standard/Nonstandard Accommodations

Proposed Section 504 Request for Standard Accommodation

Step 1- To publish a Public Notice

The public notice will be available by:

- Internet, -Office Posters, Social Security Television, and Pamphlets

Step 2- Identification (how will an individual let us know that an accommodation is needed)

-Requestor will self-identify face-to-face, video, or by telephone

*Note, Members of the public who are blind or low vision, may use internet Special Notice Options (iSNO) to self- identify and request an accommodation.

Step 3- Explain 504 Policy/ Other Accommodations

- The SSA Employee will explain Section 504 policy to the requestor
- Employee will explain what a Standard Accommodation entails
- Employee provides card options for the deaf or hard of hearing
- Employee provides Special Notice Options (SNO) for individuals who are blind or visually impaired

(If a Standard Accommodation is requested then...)

Step 4- Select Accommodation

- Requestor indicates preference among standard accommodations
- For individuals who are blind or visually impaired, SSA will document the request using iSNO
- Employee will enter the request in automated system

*Prerequisites:

- Comprehensive 504 Policy
- Agency-wide 504 training
- Easy access to 504 procedures
- Standard Request for Accommodation Form

*The SNO Process Includes:

- Automation for self-initiated request on line or in office
- Includes connection between notice option request, and actual notice systems
- One-time request
- Automated Management Information
- Does not allow for multiple accommodations

(If a Non-Standard Accommodation is requested then...)

Step 5- Explain Process for Requesting Non-Standard Accommodation

- Employee will explain to the requestor the process for requesting Non-Standard accommodations, and that their request can take up to 45 days to process.
- Employee will advise requestor that they should choose one of the currently available options in the interim, so that we can assist immediately.

*If above takes place, then employee will begin new process request for Non-Standard Accommodation

Proposed Section 504 Request for Non-Standard Accommodation

Step 5- Explain Process for Requesting Non-Standard Accommodation

- Explain SSA's process for requesting a non-standard accommodation and that is not immediate
- Offer interim Standard Accommodation (SA) so that we can assist immediately

Then

Step 6- Document and Route Non-Standard Accommodations, with Interim Standard Accommodation

- Document the request in the automated system
- Route request to Manager/Designee

Then

Step 7- Route to Center for Section 504 Compliance

- Log request in centralized database/repository/website, etc.

(Central site, e.g. Sharepoint, other)

Then

Step 8- Center for Section 504 Compliance Considers Request

- Screen the request
- Evaluate and conduct any necessary outreach
- Consider the request for Non-Standard Accommodation
- Notify the Office of General Counsel (OGC) of disposition
- Notify Requestor by mail of the request, cc: Regional component head, and manager in originating component
- If the requester is unsatisfied with the disposition of their request, they have 180 days from receipt of notice to file a Program Discrimination Complaint (SSA-437)
- An individual may file later when good cause is shown.

(Graphic of Center of 504 Compliance showing five graphics representing the office)

***Prerequisites:**

- 504 Coordinator
- Comprehensive 504 Policy
- Agency-wide 504 training
- Easy access to 504 procedures
- Standard Request for Accommodation Form
- Standard list of accommodations by major disability category

***Long-term requirements for future consideration:**

- Automation to support self-selection (e.g. RA, WIZ, which is an automated online process by which SWSA employees can make a request for a reasonable accommodation) and one-time request
- Workload control for request and disposition
- Automated management information
- Monitoring process/mechanism connecting request and outcome
- Ongoing process for measuring customer satisfaction
- Metrics and strategy for continuous improvement

Appendix C - Role of the Center for Section 504 Compliance

Each agency component is responsible for implementing Section 504. This business process vision establishes the Center for Section 504 Compliance (Center) to bring together both the strategic and tactical aspects of implementing our Section 504 activities. Below is a description of the purpose and function of the Center.

The Center is responsible for ensuring coordination of and compliance with our Section 504 policies and procedures. The Center serves as the agency lead and principal adviser to the Deputy Commissioner and Assistant Deputy Commissioner of Human Resources on agency-wide Section 504 policy development, implementation, and compliance. These issues usually cut across functional, program, or jurisdiction lines. In addition to the functions below, the Center is responsible for providing direction, oversight, and program expertise for interwoven segments of our civil rights program, legislative initiatives, and projects involving Section 504 activities.

The staff in the Center has expert knowledge of the concepts, principles, laws, regulations, and policies governing Federal civil rights issues, including relevant judicial and administrative decisions. In addition, the staff has comprehensive knowledge of operations performed across agency components and serves as a key program expert and advisor to the Commissioner. To accomplish these tasks, the Center is able to effectively communicate and negotiate internally across agency components and externally with advocates, the public, and other agencies. Specific functions include:

- Reporting to the Deputy Commissioner and Assistant Deputy Commissioner of Human Resources on the full range of Section 504 program issues;
- Leading the implementation of the Section 504 business process, including working across components to effectively communicate, train, market, and develop tools for the successful implementation and improvement of Section 504 policies and procedures;
- Ensuring Section 504 policies and procedures are disseminated and maintained;
- Ensuring public notice of rights and information about accommodations are made available in accordance with agency-specific regulations;
- Considering requests for nonstandard accommodations and monitoring implementation;
- Monitoring compliance and ensuring the public can easily request accommodations;
- Ensuring Section 504 training is developed and integrated in our core curriculums;
- Monitoring the delivery of refresher training;
- Communicating precedents or examples across the agency when a nonstandard accommodation is approved;
- Conducting periodic reviews to ensure the effective implementation of Section 504 and individual accommodations;
- Updating the available standard accommodations our agency provides based on economic, information technology, or other developments in the Federal sector;

- Participating in interagency workgroups to stay up to date with ongoing civil rights affairs and to identify best practices for continuous improvement;
- Initiating other actions to ensure compliance and escalating issues that cannot be resolved between the Center and the component head to the Commissioner or his or her designee; and
- Collaborating with the Office of Communications to establish and foster relationships with advocacy groups.

Appendix D – Implementing Section 504 and Interviewing Procedures

Blind or Visually Impaired

In 2010, we expanded standard accommodations for individuals who are blind or visually impaired. In addition to requesting a special notice option by telephone or in person, customers who are blind or visually impaired may select the way they want SSA to format any notices mailed to them by going online to request one of the available special notice option at www.socialsecurity.gov/notices/. We use this information to send all notices in the customer's preferred format. We currently offer seven special notice options:

- Standard print notice by first-class mail.
- Standard print notice by certified mail.
- Standard print notice by first-class mail and a follow-up telephone call.
- Braille notice and a standard print notice by first-class mail.
- Microsoft Word files on a data compact disc (CD) and a standard print notice by first-class mail.
- Audio CD and a standard print notice by first-class mail.
- Large print (18-point size) notice and a standard print notice by first-class mail.

When interviewing customers who are blind or visually impaired, employees should follow special interviewing techniques described in Program Operations Manual System (POMS) [DI 11005.070](#), and:

- Not confuse vision impairments or “legal blindness” with “total blindness.” Many legally blind individuals have residual (or remaining) sight. Many who are legally blind walk without the use of a cane or service animal and can read printed text with some accommodations, such as large print or a magnifier.
- Ask the individual if he or she would like physical guidance. If the customer accepts assistance, employees should offer an arm or elbow as a guide and let the customer follow the motion of the employee's body. Walk at a normal pace. Guide their hand or arm to the back of a chair. When guiding, slow before a step, barrier, or turn and describe the reason for the slowing. Avoid pointing or using abstract visual cues (e.g., over there, that one, up ahead).
- Speak directly to the individual who is blind or vision impaired. Do not shout. When leaving the room, say so.
- When using directional words, use them with the orientation of the person who is blind.
- Avoid telling the person to go “here” or “there,” accompanied by pointing when giving directions; instead, provide meaningful directions, such as “Turn left” or “Go forward about ten feet.”
- Feel comfortable using words like “look” and “see.” There are no reasonable substitutes.
- Leave the guide dog or service animal alone while it is “on duty.”
- Provide a well-lit area for the interview and avoid sharp contrasts of light and dark areas. A customer's visual acuity may change under differing light conditions.

- Read written materials to the customer and offer assistance filling out forms. Many customers with visual impairments can complete forms and sign their names when you indicate the appropriate spaces to them.

Cognitive or Learning

Agency employees may not readily identify customers who have a learning or cognitive disability. We rely on disclosure from the individual in order to offer accommodations that facilitate equal and meaningful access to services. When a member of the public indicates he or she has a learning or cognitive disability, such as autism, traumatic brain injury, organic mental disorder, or intellectual disability, and requires an accommodation, employees should:

- Offer service delivery options including online, by telephone, or in office.
- Offer standard print notice by first-class mail with a follow-up telephone call.
- Offer an audio CD and a standard print notice by first-class mail.
- Offer to refer the customer to local advocates or counseling resources.
- Offer more time to provide information (with good cause).
- Explain our representative payee policy and assist in finding a representative payee or assistance from other third party.

When interviewing customers who indicate or appear to exhibit signs of a learning or cognitive disability employees should follow special interviewing techniques described in POMS [DI 11005.076](#), and:

- Repeat information clearly and concisely and provide written instructions when needed.
- Offer a quiet location for customers to hear, read, understand, and respond to questions or information.
- Consider that individuals with perceptual learning disabilities have difficulty with accuracy. They may reverse numbers and place words or numbers in the wrong spaces on a form. In a post-entitlement situation, this difficulty may result in reporting information to us incorrectly or late. Consider policy provisions, including good cause, due process, and other accommodations when evaluating whether the individual intended to report information timely and accurately.
- Repeat information to ensure that individuals with motor learning disabilities, such as dyspraxia, understand.
- Consider that individuals with learning or cognitive disabilities may be sensitive to tactile stimulation and may not like others touching them, including shaking hands. They also may have trouble judging the amount of pressure they exert in such actions as holding objects.
- Be thorough, direct, and specific in communication.

Deaf or Hard of Hearing

In offices where employees interact face-to-face with deaf or hard of hearing customers, employees use an 11x17 inch laminated options card to illustrate and explain the available

accommodations. The card provides options in both English and Spanish. Employees use the options card every time a member of the public who is deaf or hard of hearing approaches a reception window without an interpreter. We offer deaf and hard of hearing customers the following standard accommodations:

- Service delivery options including online or by video remote interpreter.
- UbiDuo – A two-way communication device consisting of a full-size keyboard and screen on each half, enabling employees to interact directly and immediately with clients who are deaf or hard of hearing, or have difficulty speaking.
- Certified or qualified sign language interpreter – A certified sign language interpreter is any person certified by the National Registry of Interpreters for the Deaf (RID), certified by the National Association of the Deaf, or who holds a Level III State screening credential from any State RID. A qualified sign language interpreter is any person who is able to interpret effectively, accurately, and impartially, both receptively and expressively.
- Hand-written notes.

Our objective when dealing with all customers is to communicate effectively and obtain appropriate information from the customer in order to provide quality service. When interviewing customers who may be deaf or hard of hearing, employees should follow special interviewing techniques described in POMS [GN 00203.012](#), and:

- Vocalize a greeting and, if necessary, discreetly wave a hand or gently tap the person's shoulder to get his or her attention.
- Ask the customer how he or she prefers to communicate using the options card (e.g., UbiDuo, hand-written notes).
- Address the customer directly, not the interpreter, when an interpreter is present either in person or by video.
- Face the customer directly, so that he or she can see your face and mouth clearly.
- Do not over-exaggerate lip movements to pronounce words; speak clearly in a normal volume.
- Use meaningful facial expressions and gestures to communicate your intent and attitude.
- Alert the customer when changing the subject.
- Do not assume the customer knows sign language and not assume that everyone needs an interpreter.
- Ask the customer to repeat what he or she said as needed, and consider paper and pencil if repeated attempts to understand fail.
- Find a quiet place away from other sounds to communicate.

Note: We offer a toll-free Text Telephone (TTY) number at 1-800-325-0778.

Mobility or Physical

When a member of the public indicates a mobility or physical disability, we will offer service delivery channels, such as online, by telephone, or by mail, and will help complete forms. The

objective is to minimize the physical discomfort of having to travel to an office or sit in an office waiting area.

In an office setting, where customers wait to receive service, our goal is to provide, where available:

- Accessible parking.
- Level entry or ramp access.
- Automatic door openers.
- Ample circulation space and turning radius for individuals using a mobility device, such as a powered wheelchair or scooter.
- Seating options such as bariatric chairs, chairs with assist lift cushions, forward leaning chairs, and stand/lean stools, when available.
- Accessible restrooms with grab bars, accessible sinks and hand towels, and ample turning radius for powered wheelchairs.

When interviewing customers who have a physical or mobility disability, employees should:

- Offer assistance and wait for the customer to explain exactly what assistance would be helpful.
- Make every effort to ensure interviews are at wheelchair accessible locations. In situations where there is no wheelchair accessible interviewing counter, employees should make every effort to sit at eye level so that the customer does not have to crane his or her neck to look up and make eye contact.
- Be sure to speak directly to the person in the chair, which may require moving to a private interview space and pulling up a chair. Employees should not leave the facility to provide service outside of the office in a van or other location.
- Do not touch, hold onto, or push the customer's wheelchair. It is part of the customer's body space.
- Do not move an assistive device out of reach.
- Do not be sensitive about using words like "running" or "walking."
- Offer assistance filling out forms if necessary because of a dexterity limitation.

Psychological or Emotional

Similar to cognitive and learning disabilities, employees may not readily identify customers who may have an emotional or psychological disability. In these cases, we rely on disclosure from the individual in order to offer accommodations that facilitate equal and meaningful access to our services. When members of the public indicate suffering from a condition such as anxiety, depression, schizophrenia, or other mental disability and need an accommodation, employees should explore with them the ways that they do not have meaningful access; actions that prevent meaningful access. Employees then determine if standard accommodations would eliminate barriers. Standard accommodations we offer include:

- Service delivery options including online, by telephone, or by mail.

- Standard print notice by first-class mail with follow-up telephone call.
- Audio CD and a standard print notice by first-class mail.
- To refer the customer to local advocates or counseling resources.
- More time to provide information (with good cause).
- Explanation of our representative payee policy and assistance in finding a representative payee or other third party to provide assistance.
- Private space to conduct the interview if necessary.

When interviewing customers who indicate a psychological or emotional disability, employees should follow special interviewing techniques described in POMS [DI 11005.076](#), and:

- Stay positive, personable, and professional.
- Assist the customer in staying focused on the interview by asking clarifying questions or providing reminders of the task.
- Refrain from answering any personal questions the customer might direct toward the employee.

Appendix E - Frequently Asked Questions

What guidance do we currently have in place to address providing the public accommodations?

Employees routinely provide assistance using guidance for special interviewing situations. These special situations include:

- Program Operations Manual System (POMS) [GN 00203.009](#): Difficult Interviewing Situations (Overview)
- POMS [DI 11005.075](#): Difficult Interviewing Situations (Overview)
- POMS [GN 00203.010B](#): Interviewing People Who are Terminally Ill
- POMS [GN 00203.010D](#): Interviewing People with Behavioral Problems
- POMS [GN 00203.012](#): Special Interviewing Situations (Deaf or Hard-of-Hearing Individual)
- POMS [GN 00203.013](#): Interviewing People Who Act Hostile
- POMS [GN 00203.014](#): Interviewing People Who May Be Victims of Abuse
- POMS [DI 11005.070](#): Field Office Title II or Title XVI Disability Provisions for Claimants Who are Blind or Visually Impaired
- POMS [DI 11005.076](#): Interviewing People with a Mental Impairment(s)
- POMS [GN 00203.010C](#): Interviewing People with Contagious Diseases
- POMS [GN 00203.011](#): Special Interviewing Situations: Limited English Proficiency (LEP) or Language Assistance Required

How do we know that individuals understand, or do not understand, our program information?

We have no way of knowing 100 percent of the time. However, we can know some information through complaints, requests for assistance, and customer satisfaction surveys for in-office visitors, telephone calls, and the retirement and disability claims processes.

Have we benchmarked with other agencies to determine how they implement 504?

Yes. We benchmarked other Section 504 programs in 2009. We learned that very few agencies serve the public directly through a regional or field office infrastructure to the extent that we do. The Department of Veterans Affairs, which is most comparable, has no specific process for providing accommodations to the public – it receives and adjudicates civil rights complaints only in its Office of Diversity and Inclusion, which includes Equal Employment Opportunity and other civil rights functions.

How did we reach out to advocates?

We published Federal Register Notices on [November 5, 2010](#) and [August 2, 2011](#) inviting the public to provide meaningful feedback on our Section 504 project. In 2011, we held two public forums covering policy, facilities, technology, and communication.

On March 21, 2012, we hosted a national webinar focused on communicating effectively with individuals with mental disabilities. The webinar solicited feedback through an online survey and offered an open-ended opportunity for individuals to comment by email at SSA.504@ssa.gov. We considered all of this feedback in the draft self-evaluation and resulting recommendations. The webinar is available online at www.socialsecurity.gov/webinars/03262012.html.

Do we offer accommodations 100 percent of the time?

No. Accommodations do not apply to everyone. We provide accommodations based on disability when requested by an individual who requires accommodation to have meaningful access to an agency program or activity. As we do with other customers, we make a presumption that individuals with disabilities are capable of doing business with SSA without an accommodation.

How can technology help streamline this process?

Technology can help us communicate and educate employees about Section 504, and it can help streamline the Section 504 workflow within the agency. In the future, individuals will be able to request an accommodation online, and we will have advance notice of the request so that it can be provided timely. However, to start, we need a business process, published policy, and employees trained to understand what accommodations are available when we receive a request. In many instances, an accommodation will be slightly modifying how we communicate with someone – whether it is reading a notice, providing an interpreter, or assisting with space or seating in an office or waiting area.