



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

Introduction

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

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

- **Program Accessibility.** Equal opportunity to access programs, services, and activities that are delivered in the most integrated setting appropriate to the individual’s needs.
- **Physical Access.** Accessible new construction and alterations in accordance with applicable architectural standards.
- **Effective Communication.** Individual Departments make available reasonable accommodation and/or assistive services specific to the population they serve.
- **Reasonable Accommodation.** Individual Departments make available reasonable accommodation and/or assistive services specific to the population they serve.

NCTCOG’s Notice of Reasonable Accommodation

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

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

As applicable, individual Departments make available assistive services, equipment, and technology specific to the population they serve. Some Agency accommodations currently include:

Accessible Website

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

Language Line

Language Line Interpreter Services are available.

Public Meetings

NCTCOG attempts to eliminate barriers to participation in public meetings by providing reasonable accommodations to attendees with special needs if they provide sufficient notice.

NCTCOG's reasonable accommodation process includes the following

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

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

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

Part I – Procedure for Notifying Program Beneficiaries

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

Notice of Public Meetings

Public meetings are posted at Texas Register (<https://www.sos.state.tx.us/texreg/index.shtml>) as part of the Open Meetings requirement. As applicable, individual Departments provide different methods for notice specific to the population they serve.

Part II – Procedure for Accepting and Responding to Requests

Point of Contact for Requesting Reasonable Accommodations

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

Name: Lisa Rascoe
Phone: (817) 695-9155
Email: Title-VI-Coordinator@nctcog.org
Address: 616 Six Flags Dr.
Arlington, TX 76011

Requesting Reasonable Accommodation

To submit a request for a reasonable accommodation, contact the department representative providing notice of the program or event, if known or published in the notice. If the department, program, or event contact information is unknown, email Title-VI-Coordinator@nctcog.org or call (817) 695-9155 or (817) 704-2543.

Accommodation Request Process Overview

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

RECEIPT OF REQUEST

Request is received by NCTCOG.

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

TRACKING OF REQUEST

Request is tracked.

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

REVIEW OF REQUEST

Request is reviewed:

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

RESPONSE

After reviewing the request, the Title VI representative will contact the individual making the request to notify them of the decision.

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

How to Obtain Accommodations

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

Confidentiality

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

Future Accommodations

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

Part III – Procedure for Monitoring

The Agency maintains a log of accommodation requests and responses for record keeping and monitoring.

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