

HOUSING AND COMMUNITY INVESTMENT DEPARTMENT

Effective Communication Policy

Effective November 14, 2019

The Housing and Community Investment Department of the City of Los Angeles (HCID) is committed to providing access to all of its programs, services, and activities for persons with disabilities.

It is the policy of HCID to ensure that their communications with individuals with disabilities are as effective as communication with others. To achieve this, HCID will comply with Title II of the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, California Government Code 11135, and the Guidance in the U.S. Department of Justice's ADA guidance on Effective Communication, January 31, 2014 (<http://www.ada.gov/effective-comm.htm>). (Attachment 1)

HCID, including its employees, agents, contractors and private management companies/agents, shall furnish appropriate auxiliary aids and services, where necessary, to afford individuals with disabilities, including individuals with hearing, vision, speech, manual, cognitive, and other communication-related disabilities, an equal opportunity to participate in, and enjoy the benefits of, the programs, services and activities of HCID.

HCID shall comply with all applicable federal and California statutes and regulations relating to effective communication, auxiliary aids and services, and accessible communications and websites. HCID shall also comply with the City of LA's ADA Guidance: Inclusionary, Accessible Messaging and Effective Communication, March 13, 2014 (Attachment 2), or updated versions, including its provisions regarding Language Usage, Accessible Messaging, Videos and Multimedia Accessibility, Social Media Accessibility, Print Messaging, etc.

All notifications, including responses to requests for auxiliary aids and services referenced in this policy, will be provided in an alternative format upon request.

I. Auxiliary Aids and Services

To meet the obligation to provide effective communication with individuals with disabilities, HCID will furnish appropriate auxiliary aids and services, where necessary, to ensure that individuals with disabilities have an equal opportunity to participate in, and benefit from, the programs, services, and activities of HCID.

HCID will provide, at its expense, auxiliary aids and services where necessary for effective communication with members of the public and employees. No person with a disability will be asked or be required to provide and/or pay for their own interpreters. A person with a disability may request a specific type of auxiliary aid or service as his or her preferred method of communication.

The type of auxiliary aid or service necessary to ensure effective communication will vary in accordance with the method of communication used by the individual; the nature, length, and complexity of the communication involved; and the context in which the communication is taking place. In determining what types of auxiliary aids and services are necessary, HCID will give primary consideration to the requests of individuals with disabilities. In order to be effective, auxiliary aids and services shall be provided in accessible formats, in a timely manner, and in such a way as to protect the privacy and independence of the individual with a disability.

A. Auxiliary aids and services may include, but are not limited to:

1. Qualified sign language interpreters on-site or through video remote interpreting (VRI) services; note takers; real-time computer-aided transcription services (CART); written materials; exchange of written notes; assistive listening device systems; closed captioning on audio-visual or similar audio presentations used by the City; or other effective methods of making aurally delivered information available to people who are deaf or hard of hearing;

2. Qualified readers; taped texts; audio recordings; Brailled materials and displays; screen reader software, magnification software, optical readers on computers available for viewing by applicants or residents; large print materials; accessible electronic and information technology formats for documents supplied by e-mail or on a disc; transcribing non-readable PDF and other digital formats into formats that can be read by screen-readers; or other effective methods of making visually delivered materials available to people who are blind or have low vision;
3. Speech -to-Speech relay phone service, or Visually Assisted Speech-to-Speech relay phone service through Skype, for people with speech disabilities;
4. Providing oral explanations and assistance in completing forms for people with cognitive or other disabilities.

B. Responding to Requests for Auxiliary Aids and Services

When an auxiliary aid or service is required to ensure effective communication, HCID will provide an opportunity for an individual with disabilities to request the auxiliary aid or service of their choice. HCID will give primary consideration to the choice expressed by the individual. "Primary consideration" means that HCID will honor the choice, unless:

1. HCID can demonstrate that another equally effective means of communication is available;
2. The use of the means chosen would result in a fundamental alteration in the service, program or activity; or
3. The use of the means chosen would result in an undue financial and administrative burden, considering all resources available.

Auxiliary aids and services will be provided in such a way as to protect the privacy and independence of the individual with a disability.

Except in an emergency, at no time will a family member or friend be requested to provide the auxiliary aids or services. In addition, no minor child shall be authorized to provide auxiliary aids or services, except in an emergency involving an imminent threat to the safety or welfare of an individual or the public and where there is no interpreter available.

When possible and practical, auxiliary aids and services will be provided immediately on an as needed basis, and “walk-in” requests for auxiliary aids and services will be honored to the extent possible.

However, there may be instances in which it is not possible to provide requested auxiliary aids and services immediately, such as arranging for Braille materials or American Sign Language Interpreters. In these instances, individuals requiring these services should, where possible, make the request for auxiliary aids or services in advance of when such auxiliary aids or services will be needed. The advance request for auxiliary aids or services shall be submitted to HCIDLA Accessible Housing Program (AChP). A response will be provided promptly and in no event later than 3 business days.

Requests can be submitted by the individual with a disability or someone acting on their behalf by mail, phone, email or in person to:

**Address: Housing and Community Investment Department
Accessible Housing Program
221 N Figueroa Street, Suite 1400
Los Angeles, Ca 90012**

Email: hcidla.achp@lacity.org

Phone No.: 213-808-8550

TTY No.: 213-473-3231

While written or email requests are preferred, an individual with a disability may use any other effective means to request an auxiliary aid or service that is necessary. All requests must include the person's name and contact information.

If requested, HCID will provide, as reasonable accommodations, email, text, and/or fax communications.

C. Telephone Calls and TTY

HCID staff will accept telephone calls placed through relay services and treat them just like other calls.

As part of its commitment to ensure effective communication, all HCID staff will be trained in how to receive, and initiate, telephone calls using a TTY or the Telecommunication Relay Services (TRS). If HCID has a TTY, it must place and accept calls using the TTY where appropriate. If HCID does not have a separate TTY number, TTY users should be directed to call 711 or use their preferred Video Relay Service (VRS) provider.

If requested by an individual who is otherwise eligible for TTY services, HCID will provide, as reasonable accommodations, email, text, and/or fax communications.

II. Public Notices

HCID shall display, in its offices open to the public and in its written communications with members of the public, information about how to request auxiliary aids and services.

HCID shall also include on all public documents, notice that reasonable accommodations will be provided to ensure equal access to HCID programs, services, and activities. Specifically, the following language shall be placed on all materials disseminated to the public:

“HCID does not discriminate on the basis of disability and, upon request, will provide reasonable accommodations to ensure equal access to its programs, services, and activities.”

On public meeting notices and other places where it is appropriate, HCID shall also include the following language:

“Sign Language Interpreters, Communication Access Real-Time Transcription, Assistive Listening Devices, or other auxiliary aids and services may be provided upon request. To ensure availability, you are advised to make your request at least 72 hours prior to the meeting you wish to attend. Due to difficulties in securing Sign Language Interpreters, advance notice of five (5) or more business days is strongly recommended. For additional information, please contact: (Division, phone number-voice and/or TTY). HCID will attempt to respond to late requests if possible.”

HCID will ensure that managers take the necessary steps to ensure that all public documents generated by their department contain the above language in compliance with Title II of the ADA.

III. Further Information Regarding Some Methods of Communication that HCID May Provide:

A. Alternative Formats

HCID will provide, upon request from people who are blind, have low vision, or have cognitive disabilities; forms, notices, and other information in alternative formats, including in response to requests to automatically receive information in a requested alternate format. Alternate formats will be provided for all print materials distributed, posted, or made available to both applicants and residents.

B. Sign Language Interpretation

When providing sign language interpretation, HCID will provide qualified Sign Language Interpreters who are able to interpret effectively, accurately, and impartially both receptively and expressively, using any necessary specialized vocabulary. In some instances, multiple interpreters may be necessary, such as where individuals at a meeting use different types of sign languages.

C. Oral Interpretation

When appropriate, HCID will provide Oral Interpreting Services and/or Certified Deaf Interpreters, with extensive knowledge and experience with deafness.

1. HCID recognizes that Certified Deaf Interpreters are particularly useful when the communication mode used by the deaf consumer is unique, such as when they have minimal or limited communication skills or use signs that a hearing interpreter may not be familiar with (non-standard signs, "home" signs, a foreign sign language, regional signs, etc.). In addition to having sign language as their native language, Certified Deaf Interpreters have extensive knowledge and experience with deafness.
2. HCID further recognizes that Oral Interpreting Services, which involve professional interpreters with specialized skills, may be appropriate to meet the needs of individuals who rely on speech-reading as their primary mode of communication.

D. Speech to Speech Interpreters or Assistants

These interpreters assist individual who have speech disabilities in order to facilitate effective communication.

E. Assistive Listening Device Systems (ALDS)

These systems enable persons with hearing loss to participate in the proceedings of large group meetings and public forums. An ALDS is an audio system that is connected to an induction loop that

amplifies sounds and tones. Sounds and tones are then transmitted to personal receivers which are used by individuals who prefer audio enhancement.

F. Communication Access Real-Time Translation (CART) Services

These services utilize machine stenographers (real-time captionists) who enter verbal communication into a software program by using a steno machine. The program converts the steno signals to written English, which is then displayed on a personal computer screen, television or projection screen.

It is HCID's policy to only use trained interpreters who adhere to a professional code of conduct.

IV. Presentations

HCID shall ensure that all participants have equal access to the information provided by presenters.

When presenting visual information and PowerPoints, HCID staff will make the information presented available in formats accessible to people with disabilities. Printed copies of the presentation materials will be available and prepared in alternative formats as necessary. Any charts, graphics, photographs, tables, or other non-textual information shall be appropriately tagged using an alternative text description as well as described aloud for the benefit of those who cannot see.

V. Website Accessibility

A. Websites Maintained By HCID

All websites maintained by HCID shall at a minimum meet version 2.0 Levels AA of the "Web Content Accessibility Guidelines" published by the Web Accessibility Initiative (WAI) of the World Wide Web Consortium (W3C), or any subsequent version(s).

B. Documents Posted On HCID Websites

Documents posted on the HCID websites should conform to the W3C's Guidance on Applying WCAG 2.0 to Non-Web Information and Communications Technologies (WCAG2ICT) and be in formats that can be recognized and read by software commonly used by individuals who are blind or have low vision to read digital information.

This includes ensuring documents posted as Word, PowerPoint, Excel and PDF, or documents including photographs, charts, graphics, logos or other visual symbols are made accessible, tagged, or provided in alternative formats.

HCID will ensure documents posted on its website undergo accessibility compliance reviews prior to uploading and posting to websites and that any accessibility barriers are resolved before such posting.

VI. Training

HCID shall provide appropriate and periodic training to all HCID staff on the policies and procedures in this document, and shall designate an individual to be responsible for ensuring compliance and responding to questions.

VII. Compliance by Covered Programs and Contractors

HCID shall ensure that all Covered Housing Developments provide effective communication to all tenants, participants, and applicants in accord with this Policy and with Sections 2.13 3.5, and 3.17 of the Housing Policy Manual. Toward that end, HCID shall provide a Braille version of the Housing Policy Manual and related forms upon request. In addition, HCID shall maintain resource lists and information to assist Covered Housing Developments in providing effective communication.

HCID shall ensure that any contractors or subcontractors comply with this policy when communicating with or assisting members of the public.

Further inquiries can be made to HCIDLA's ADA Coordinator, Eusebio Martinez, at ej.eusebio@lacity.org.

Individuals who believe they have not received appropriate auxiliary aids and services necessary to ensure effective communication may also file complaints with the U.S. Department of Housing and Urban Development, which may investigate complaints under the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, and Title II of the ADA.