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ORIGINAL ISSUE DATE: March 6, 2018	HUMBOLDT COUNTY ADA Compliance Effective Communication Policy
REVISION DATE: August 20, 2019	

## I. PURPOSE

The County of Humboldt recognizes that some clients may have communication disabilities and may use different ways to communicate. The county strives to provide accessible services to all and this includes individuals who have partial or total hearing loss, partial or total vision loss, Dyslexia or other learning disabilities that may make reading difficult, or an individual who is regarded as having such a disability. The county recognizes the legal rights of persons with disabilities under the Americans with Disabilities Act (ADA), and applicable California statutes.

The purpose of this policy is to ensure that any individual with a vision, hearing, speech or learning disability can communicate with, receive information from, and convey information to, any county program, service or activity.

The county must provide auxiliary aids and services as needed to communicate effectively with people who have communication disabilities. Auxiliary aids or services refer to the ways to communicate with people who have communication disabilities.

This policy shall apply when communicating with an individual who is inquiring about county programs or services, receiving any county programs or services, any individual participating in county sponsored activities, including that individual's parent, spouse, or companion in appropriate circumstances.

## II. POLICY

This policy does not apply to sections H.23 through H.25 of the Consent Decree entered into by and between the Department of Justice and Humboldt County on September 7, 2016.

This policy does not replace the Website Accessibility Policy <https://humboldt.gov.org/DocumentCenter/View/56814>.

With 72 hours' written or verbal notice, individuals with qualified communication disabilities will be provided with the appropriate auxiliary aid or service at no charge to the individual.

## III. EFFECTIVE COMMUNICATION

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The key to communicating effectively is to consider the nature, length, complexity, and context of the communication and the person’s normal method(s) of communication.

When choosing an aid or service, the county is required to give primary consideration to the choice of aid or service requested by the person who has a communication disability and must honor that person’s choice, unless it can be demonstrated that another equally effective means of communication is available, or that the means chosen would result in a fundamental alteration to the nature of the service, program or activity or is an undue burden. If the choice expressed by the person with a disability would result in an undue burden or a fundamental alteration, the county still has an obligation to provide an alternative aid or service that provides effective communication if one is available.

The county is required to accept telephone calls placed through Telecommunication Relay Service (TRS), also known as the California Relay Service (CRS) and Video Relay Service (VRS), and staff who answer must treat relay calls just as any other call.

#### **IV. REASONABLE MODIFICATIONS**

The county will make reasonable modifications to its policies, practices and procedures when necessary to avoid discrimination against any person with a qualified disability. A qualified disability includes partial or total hearing loss, a partial or complete loss of vision, a learning disability, or is regarded as having such a disability; unless the county can show that making the modification would fundamentally alter the nature of the service, program or activity.

#### **V. FORMS OF EFFECTIVE COMMUNICATION**

##### **A. Qualified Sign Language Interpreter**

A qualified interpreter is someone who can interpret effectively, accurately, and impartially, both receptively (i.e., understanding what the person with the disability is saying) and expressively (i.e., having the skill to convey information back to that person). The county has retained two qualified sign language interpreterservices to be utilized on an as need basis for any county department or division’s use. Upon request and with advanced notice, individuals with qualified disabilities will be provided with appropriate sign language interpretation services.

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**B. Video Relay Service**

Video relay service (VRS) is a free, subscriber-based service for people who use sign language through videophones, smart phones, or computers with video communication capabilities. For outgoing calls, the subscriber contacts the VRS interpreter who places the call and serves as an intermediary between the subscriber and the person using a standard voice telephone. The interpreter communicates what the subscriber is signing and signs to the subscriber what the telephone user is saying. The communications assistant will explain how the system works if necessary.

**C. Video remote interpreting (VRI)**

Video remote interpreting (VRI) is a fee-based service that uses video conferencing technology to access an off-site interpreter to provide real-time sign language or oral interpreting services for conversations between hearing people and people who are deaf or have hearing loss. The new regulations give covered entities the choice of using VRI or an on-site interpreter in situations where either would be effective. VRI will not be effective in all circumstances; for example, if the person who needs the interpreter has difficulty seeing the screen because of vision loss or because the person cannot be properly positioned to see the screen, an on-site interpreter may be required.

If VRI is chosen, all of the following specific performance standards must be met:

- Real-time, full-motion video and audio over a dedicated high-speed, wide-bandwidth video connection or wireless connection that delivers high-quality video images that does not produce lags, choppy, blurry, grainy images, or irregular pauses in communication;
- A sharply delineated image that is large enough to display the interpreter’s face, arms, hands, and fingers of the person using sign language, regardless of his or her body position;
- A clear, audible transmission of voices; and
- Adequate staff training to ensure quick set-up and proper operation.

**D. Video Captioning**

Video captioning may be open or closed. Open captioning text is always shown and integral to the provided video. Closed captioning is on a separate track and may be enabled or disabled by the viewer. These services, can be provided on-site or remotely and are particularly useful for people who are deaf or have hearing loss, but do not use sign language.

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**E. Assistive Listening Systems**

Assistive Listening Systems (ALSs) are also known as Assistive Listening Devices (ALDs). These are amplifiers that bring sound directly into the ear, separating sounds, particularly speech, that a person wants to hear from background noise. They improve what is known as the “speech to noise ratio.”

Assistive listening systems shall be kept and maintained by all county departments, in numbers that are a ratio of the available public seating in meeting rooms and assembly areas, including conference rooms or public venues sponsored by the county. Please contact the County ADA Coordinator to coordinate the purchase of these devices.

The required number of systems available will be per the following table:

Capacity of Seating in Assembly Area	Minimum Number of Required Receivers	Minimum Number of Required Receivers Required to be Hearing-aid Compatible
50 or less	2	2
51 to 200	2, plus 1 per 25 seats over 50 seats <sup>1</sup>	2
201 to 500	2, plus 1 per 25 seats over 50 seats <sup>1</sup>	1 per 4 receivers <sup>1</sup>
501 to 1000	20, plus 1 per 33 seats over 500 seats <sup>1</sup>	1 per 4 receivers <sup>1</sup>
1001 to 2000	35, plus 1 per 50 seats over 1000 seats <sup>1</sup>	1 per 4 receivers <sup>1</sup>
2001 and over	55 plus 1 per 100 seats over 2000 seats <sup>1</sup>	1 per 4 receivers <sup>1</sup>

1 or fraction thereof.

Exceptions:

- A. In assembly areas where audio amplification is not provided.

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- B. Where a building contains more than one assembly area and the assembly areas required to provide assistive listening systems are under one management, the total number of required receivers shall be permitted to be calculated according to the total number of seats in the assembly areas in the building provided that all receivers are usable with all systems.
  
- C. Where all seats in an assembly area are served by an induction loop assistive listening system, the minimum number of receivers required to be hearing-aid compatible shall not be required to be provided.

Permanently installed assistive listening systems are required in areas that accommodate at least 50 people, or have audio amplification systems and permanently installed seating.

Accessible signage shall be provided in each assembly area. The sign shall include the wording, "Assistive-Listening System Available" and shall be posted in a prominent place at or near the assembly area entrance and shall include the following symbol:



**F. Telecommunication Relay Service (TRS), California Relay Service, 711**

The free nationwide telecommunications relay service (TRS), also known as California Relay Service or 711 can be reached by calling 7-1-1. TRS uses communication assistants who serve as intermediaries between people who have hearing or speech disabilities who use a text telephone (TTY) or text messaging and people who use standard voice telephones. The communications assistant communicates to the telephone user what the other party is typing and then types to the other party what the telephone user is saying. TRS also provides speech-to-speech transliteration for callers who have speech disabilities. The communications assistant will explain how the system works if necessary.

**G. TTY**

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For telephone communications, many people who have partial or total hearing loss use a teletypewriter (TTY or TDD) rather than a standard telephone. These devices have a keyboard and a visual display for exchanging written messages over the telephone.

#### **H. Qualified Reader.**

A qualified reader is a person who can read effectively, accurately, and impartially, using any necessary specialized vocabulary.

Under some circumstances, county employees may be asked to read written material to a person with a vision or learning disability, or to assist in filling out paperwork for such person. County employees may suggest making the written material available in Braille, large print, or electronic format, but this may not always be possible. When an individual requests assistance for document completion, every effort should be made to assist the individual at the time the request is made. If this is not possible, a mutually convenient time should be arranged to provide such assistance.

#### **I. Compact Disc or Flash Drive**

Upon request written materials shall be provided in plain text or word processor format with digital information stored on a compact disc or flash-drive.

#### **J. Large Print**

Upon request, enlarged print should be made available in the following format:

- Use 18-20-point type
- Use standard 8 ½ x 11" paper. Larger paper should not be used. Use a simple sans serif font such as Verdana bold or Arial bold.
- Use an off-white, very pale yellow or cream-colored non-glossy paper, such as paper used for photocopying purposes, this will result in the best contrast with the least glare. Do not use dark colors or shades of red.
- Spacing between lines of text must be between 1.25 and 1.50 (inches)
- Use 1" margins. Lines longer than 6" will not track well for individuals who use a magnifier.
- Double-sided copying (if print does not bleed through) will produce a less bulky document.
- Use upper and lowercase letters.
- Avoid condensed, compressed or fancy fonts and italics, as they are difficult to read.
- Use only left margin justification for uniform spacing across lines.

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- Avoid centered or indented text, this can be difficult to track because only a few words will fit on a line. All text should begin at the left margin.
- Spacing between lines of text should be between 1.25 and 1.50 (inches) as many people with partial sight have difficulty finding the beginning of the next line while reading.
- Page numbering should be at the top left, this is not necessary if all the lines are left justified.
- Avoid columns. If columns are absolutely necessary, use minimum space between columns.
- Use dot leaders for tabular material.
- Graphics should be included but placed on a separate page from the text. It is important to describe the graphics and pictures in the text for individuals with low vision who are unable to read them.

#### **K. Braille**

Braille is a six-dot tactile system for reading and writing that allows people with blindness and visual impairments to read and write. Upon request, documents shall be provided in Braille format. Turn-around time varies depending upon the complexity of the requested document(s). Humboldt County has contracted with a service for transcription of written documents to Braille on an as needed basis.

#### **VI. ADDITIONAL RESOURCES**

Pacific ADA - Relay Service: <http://www.adapacific.org/relay-services>

Pacific ADA - Websites and Electronic Documents Accessibility:  
<http://www.adapacific.org/awed#ICT>

U.S. Department of Justice – Effective Communication:  
<https://www.ada.gov/effective-comm.htm>