

Effective Communication Policy

This policy and procedure shall apply to all City of Philadelphia entities*

Policy:

The Americans with Disabilities Act (ADA) ensures civil rights protections to qualified people with disabilities*. Under Title II, the City is required to ensure that their communications with people with disabilities are as effective as communications with others.

This policy upholds the commitment of the City of Philadelphia (City) to operate the policies, practices, procedures, services, buildings, and activities so that, when viewed in their entirety, they are accessible to and useable by qualified people with disabilities. The City will provide aids and services* to facilitate effective communication, upon request, to ensure that qualified individuals with disabilities are able to participate in, benefit from, and are not subject to discrimination under City programs.

Implementing Policy:

1. Residents may request aids and services to facilitate effective communication. The request must allow a person with a disability to participate in, and enjoy the benefits of programs, services, and activities in the same manner as residents who are not disabled. Residents may enter effective communication requests online at phila.gov/reasonable-modification using the reasonable modification policy and procedure.
2. Departments shall ensure that communications with applicants, participants, members of the public, and companions with disabilities are as effective as communications with others. The purpose of effective communication is to ensure that people with communication disabilities can receive information from, and convey information to, the City.
3. The type of aid or service necessary to ensure effective communication will vary on a case-by-case basis.
 - I. Consider the nature, length, and complexity of the communication.

- II. When more than one type of communication can meet the need, give primary consideration to the communication requested by the individual with a disability.
- 4. Departments shall provide appropriate aids and services free of charge.
- 5. The City is responsible for providing interpreters. Residents are not required a person to bring someone to interpret for him or her.
- 6. The City can rely on a companion to interpret only when the following are true:
 - I. There is an emergency involving imminent threat to safety or welfare.
 - II. The resident prefers that a companion interpret, *and* the companion agrees, *and* reliance on the companion is appropriate under the circumstances.
- 7. Information about the location of accessible services, activities, and facilities must be available in a format that is accessible to people with disabilities. Accessible formats may include posting location information in large print or posting information on a webpage.
- 8. Signage* must be provided in accordance with the 2010 ADA Standards.
- 9. Departments must be able to make and receive telephone calls with individuals who are deaf, hard of hearing, deaf-blind, or have difficulty speaking. Pennsylvania Relay provides service and training.
 - I. To use Pennsylvania Relay Dial 7-1-1 or 800-654-5988.
 - II. To obtain training for Pennsylvania Relay contact amy.strawser@hamiltonrelay.com
- 10. City employees designated as emergency personnel who provide direct telephonic services to the public must have and proficiently operate a dedicated TTY. Operators must use the TTY when they receive a silent call in addition to when they receive TTY tones.