# HEARING INCLUSION: ACCOMMODATIONS IN PRACTICE

What does it mean to provide accessibility and inclusivity for people that are Deaf or Hard of Hearing (D/HH) at American Job Centers (AJCs)? It is essential that we not only respond to their specific needs in a manner that fosters and promotes accessibility and inclusivity along the way, but also ensure that there is equal opportunity. This resource carefully considers access and communication strategies, best practices, assistive technologies, and resources shared by the D/HH community.

## What laws apply to effective communication for people who are D/HH?

Section 504 of the Rehabilitation Act of 1973 (Section 504) forbids public and private entities that receive financial assistance from any federal department or agency ("covered entities") from excluding qualified individuals with disabilities or denying them an equal opportunity to receive program benefits and services.

The Americans with Disabilities Act of 1990 (ADA) protects individuals with disabilities in employment, state and local government services, public accommodations (most private offices and businesses), transportation, and telecommunications.

## Communication

Not all individuals who are deaf, deafblind, hard of hearing, or late-deafened will always communicate in the same way. Their communication needs will vary based on the setting, situation, and communication partners involved. Successful communication is the joint responsibility of all involved in the AJC setting and requires a proactive, intentional approach. First, never assume each person who is deaf is the same in terms of how they communicate or what access looks like in a particular setting. It is essential to ask the individual person who is D/HH about their language preferences, communication approaches, and home, school, or workplace characteristics to know what support works or does not work. Communication is an essential part of providing service to the public.

### Why don't all people who are deaf lip-read?

Only 30-40% of sounds are visible on the lips. Lip-reading is not easy, as it involves combining contextual information, visual clues from facial expression and gestures, and auditory information from spoken words. The accuracy of lip-reading will be diminished if the speaker does not articulate clearly, speaks too quickly or slowly, covers their mouth, has facial hair, is in front of a distracting background, or is some distance away. Lip-reading is NOT considered an accommodation.

**Communication Tips:**

- Include individuals with disabilities during the planning phase – ask them about their preferences.
- Make sure everyone is ready and has access before starting to talk.
- Direct attention to the D/HH person and not the interpreter.
- Allow time for the person who is deaf to look from one person to another in group settings.
- When using an interpreter or speech-to-text provider, identify who is speaking and allow time to take turns.
- Share the topic of discussion, agenda, and materials ahead of time to help with understanding and following along.
- If there is a customer who is deaf blind, obtain information such as text size, paper and ink contrast colors, or braille needs.

Some solutions to communication barriers are relatively simple and straightforward. Other solutions may be needed where the information being communicated is more extensive or complex. The ADA provides the following:

| SITUATION | SOLUTION |
|---|---|
| At an AJC, a job seeker who is D/HH has a simple question about a service. | Utilizing a voice to text app or writing notes back and forth will help in answering simple questions. |
| A job seeker who is D/HH is attending an employment seminar. | Effective communication could require:<br>• sign language interpreter or<br>• real time captioning<br>This will depend on whether the person uses sign language. |
| A job seeker who uses sign language has an appointment to discuss how certain programs will impact their benefits. | A sign language interpreter will generally be needed in this situation. |

**Examples of communication aids:**

- American Sign Language interpreters
- Video remote interpreting
- Accessible electronic and information technology
- Notetakers
- Captioning
- Large print materials

Applications (Apps) are easily accessible but may have different purposes. Below are examples of Apps that can be downloaded and used by individuals who are D/HH:

- Ava
- Cardzilla
- goTenna
- goTenna Mesh
- goTenna Pro
- Hamilton CapTel Apps
- Hand Talk

- Flip Writer AAC
- Microsoft Translator
- Nagish
- RogerVoice
- T-Mobile IP Mobile App
- TextHear
- VoxSci

It is important for AJCs to engage in an interactive process with individuals who are D/HH to identify the specific assistive technologies and accommodations needed. The ADA requires that title II entities (State and local governments) and title III entities (businesses and nonprofit organizations that serve the public) communicate effectively with people who have communication disabilities. The goal is to ensure that communication with people with these disabilities is equally effective as communication with people without disabilities.

Additionally, AJCs should stay informed about technological advancements and updates to accessibility standards to continually improve their services. Technological advancements are the improvements and innovations that occur in various fields of technology. These advancements can lead to new products, services, or ways of doing things that are more efficient, effective, or beneficial than those that existed before. ADA's *New Rule on the Accessibility of Web Content and Mobile Apps Provided by State and Local Governments Fact Sheet* provides specific requirements to ensure that mobile applications (apps) are accessible to individual with disabilities.

The Massachusetts Institute of Technology's independent media company, *MIT Technology Review*, annually selects ten technologies that have the potential to significantly impact our lives. Technological advancements have significantly improved the lives of individuals who are D/HH**.** Technology continues to evolve, and researchers and innovators are constantly working to create more inclusive solutions for individuals with hearing loss.

**Examples of auxiliary aids and services:**
- Qualified interpreters*
- Transcription services
- Telephone handset amplifiers
- Assistive listening systems
- Telephones compatible with hearing aids closed caption decoders, open and closed captioning

- Notetakers
- Written materials
- Assistive listening devices
- Text telephones (TTYs)
- Videotext displays, or other effective methods of making *aurally delivered**** materials available to individuals who are D/HH

\* "*Qualified interpreter"* means an interpreter who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.
\*\* "*Aurally delivered*" means information that is delivered through sound, including through speech, intercoms, telephones, recorded messages, loudspeakers, alarms, etc.

## Assistive Technologies

The ADA requires that AJCs ensure effective communication and equal access to services. Assistive technologies are tools or devices that help individuals with disabilities perform tasks or access information. The specific assistive technologies needed can vary based on the nature of the disability and the individual's needs. The Workforce Innovation and Opportunity Act (WIOA) Section 188 addresses nondiscrimination and equal opportunity for individuals with disabilities. AJCs and workforce partners should consider some of the following general considerations regarding additional assistive technologies from the Job Accommodation Network:

- ➢ **Accessible Computer Workstations:** Have computer workstations that are compatible with assistive technologies such as screen readers, magnification software, and voice recognition software.
- ➢ **Screen Readers:** Ensure that their websites and digital resources are compatible with screen readers, which convert on-screen text to speech.
- ➢ **Alternative Input Devices:** Be prepared to accommodate individuals who may use alternative input devices, such as mouth sticks or head pointers, to operate computers.
- ➢ **Accessible Documents:** Documents including forms and informational materials, should be available in accessible formats.
- ➢ **Accessible Telephones:** Accessible telephones, including those with volume control and TTY (Text Telephone) capabilities, should be available for individuals with hearing or speech impairments.
- ➢ **Video Relay Services (VRS):** VRS is a free, subscriber-based Telecommunications Relay Service (TRS) for people who use sign language and have 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 a person who uses a standard voice telephone. The interpreter tells the telephone user what the subscriber is signing and signs to the subscriber what the telephone user is saying. Like all TRS calls, the per-minute rate for VRS is not assessed to the caller. VRS providers are compensated for their costs from the Interstate TRS Fund, which the FCC oversees.
- ➢ **Visual Alerting Devices:** These devices use visual cues (such as flashing lights) to alert individuals to sounds like doorbells, alarms, or phone calls.
- ➢ **Assistive Listening Technologies:** These technologies can reduce background noise, enhancing sound perception for individuals with hearing loss. They include **personal amplification systems**, **FM systems**, and **Bluetooth-enabled hearing aids** that connect to smartphones and other devices.
- ➢ **Captioning:** For online videos or presentations, providing captioning is important for individuals who are D/HH.

- ➢ **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. VRI can be especially useful in rural areas where on-site interpreters may be difficult to obtain. VRI will not be effective if the person who needs the interpreter has difficulty seeing the screen (either because of vision loss or because they cannot be properly positioned to see the screen, because of an injury or other condition). In these circumstances, an on-site interpreter may be required (ada.gov). If VRI (video remote interpreting) is chosen, all 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 do not produce lags, choppy, blurry, or 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, and the 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.

## CART and C-Print/Typewell

Computer Access Realtime Translation (CART) is a speech-to-text service where nearly every word is translated from speech to text. The CART provider is specially trained with using a steno machine. The output is usually directed to a laptop, through a web browser or projected on a large screen. C-Print and Typewell are meaning-for-meaning speech-to-text systems where speaker repetition and false starts would be eliminated, providing a more structured format of the information with fewer words. C-Print and Typewell providers train using a regular keyboard with specialized abbreviation software. The output is usually directed to a laptop, through a web browser or projected on a large screen.

## Interpreters for the D/HH

The role of the interpreter is to facilitate communication for persons who are deaf, deafblind, or hard of hearing in their preferred communication mode. Deaf Interpreters contribute significantly to ensuring effective communication and access for the d/Deaf community across various contexts. Their expertise bridges linguistic and cultural gaps, making communication more inclusive and accurate. A translation is a rendering of the meaning of a text into a different language. While there are no standards that define a qualified interpreter, certification, licensing, and credentials are available to help determine if the person being hired is the right fit for the situation (Council of State Administrators of Vocational Rehabilitation).

## Speech-to-Text Services

Real-time speech-to-text services (meaning-for-meaning or verbatim systems) provide real-time access to auditory information using text-based systems. C-print, Typewell, and CART are the

most popular types of speech-to-text services. Speech-to-text can also be provided in-person or remotely in a variety of situations, such as live-streamed events, one-on-one meetings or for in-person presentations (Council of State Administrators of Vocational Rehabilitation).



**PROVIDING IN-PERSON AND VIRTUAL SERVICES**

| PHYSICAL SPACE | VIRTUAL SETTINGS |
|---|---|
| Make sure the speaker and interpreter background are plain, without busy patterns or lights. The room should be well-lit. | Allow the service provider and individuals needing accommodation the opportunity to move or pin/spotlight speakers and content for best viewing. |
| Meet in an area without background noises, such as telephone ringing, other people talking, loud machinery or ventilation systems. Find a room with carpeting or a rug to improve room acoustics. | Ensure all have access to high-speed internet. Speakers should use quality microphones for optimal audio access for the entire audience including customers who are D/HH. |
| Reduce visual distractions, such as people walking behind, blowing curtains, flickering lights, or objects in the line of sight. | Provide customers the opportunity to communicate with the service provider to troubleshoot access issues. |
| Allow the person who is deaf to determine the best placement of the interpreter or real-time captioning display. | Provide time for practice runs with service providers and customers needing accommodation who are not comfortable with the platform being used. |

**Resources**
- ASL Resources by State (National Association of the Deaf) https://docs.google.com/document/d/1d0eHHMGo56i6YFocVw8XhayUesH3BT2NjXvACsgx3t4/edit

- Directory of *Deaf Interpreters (deaf individuals who play a crucial role in facilitating communication for individuals who are deaf or hard of hearing https://www.nad.org/deaf-interpreters-directory/

- ADA Home Page http://www.ada.gov/

- Disability Employment TA Center (DETAC)
  https://aoddisabilityemploymenttacenter.com/

- Employer Assistance and Resource Network (EARN)
  http://www.askearn.org/

- Guide to Hiring Highly Qualified Interpreters
  https://nationaldeafcenter.org/resources/access-accommodations/coordinating-services/interpreting/

- Hearing Assistive Technology
  https://www.asha.org/public/hearing/hearing-assistive-technology/

- Hearing Loss Association of America (HLAA)
  https://www.hearingloss.org/hearing-help/financial-assistance/state-agenices/
  https://www.hearingloss.org/hearing-help/communities/employees/employment-toolkit/

- Job Accommodation Network
  http://askjan.org/

- LEAD Center – WIOA Policy Development
  https://leadcenter.org/

- National Association of the Deaf
  NAD - Current home

- National Deaf Center
  https://nationaldeafcenter.org/learn/

- Office of Disability Employment Policy
  www.dol.gov/odep

- Registry of Interpreters for the Deaf, Inc.
  Home - Registry of Interpreters for the Deaf, Inc. (rid.org)

- Sign Language Interpreting and Captioning Services
  https://labornet.dol.gov/workplaceresources/office/interpreting/


For more information, please email WDTAP@dol.gov