



**U.S. Department of Homeland  
Security  
Office of Partnership and  
Engagement**

**Plan for Improving Access to Office of Partnership  
and Engagement Public-Facing Programs and  
Activities for Individuals with Disabilities**

*December 2019*

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# I. Introduction

The DHS Office of Partnership and Engagement (OPE) developed this plan to strengthen nondiscrimination for individuals with disabilities encountered and served by OPE pursuant to Section 504 of the Rehabilitation Act of 1973 (Section 504). On September 25, 2013, the Department of Homeland Security (DHS) Under Secretary for Management issued Directive 065-01, *Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-Employment)*. Among other things, the Directive requires each DHS Component to designate a lead Disability Access Coordinator (and supporting Coordinators where needed), conduct a Self-Evaluation of its programs and activities to identify barriers and gaps in ensuring access for individuals with disabilities, and develop a Component Plan to address the results of the Self-Evaluation. OPE appointed a disability access coordinator, conducted a Self-Evaluation, and began to take immediate steps to address barriers and gaps that were identified through the Self-Evaluation. This document is OPE's Component Plan.

## II. Executive Summary

OPE conducted its Self-Evaluation pursuant to DHS Directive 065-01 and the accompanying Instruction 065-01-001, *Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-employment)*, between March and June 2018. OPE used the Self-Evaluation Tool contained within the Component Self-Evaluation and Planning Reference Guide to conduct interactive discussions with staff from all of the sub-offices within the OPE. The results of these discussions indicate that staff possess a clear understanding of the obligation to provide access for individuals with disabilities in public-facing activities. Despite this awareness, the results of the Self-Evaluation also indicate a need to develop written policy and guidance and deliver subsequent staff training to improve consistency in how OPE achieves accessibility to its programs and activities.

With regard to gaps in programmatic accessibility, the Self-Evaluation identified the need to develop, manage, and implement the Plan for Improving Access to Office of Partnership and Engagement Public-Facing Programs and Activities for Individuals with Disabilities ("Plan") to address the accessibility needs of members of the public who have disabilities. In the areas of effective communication and reasonable accommodation, the Self-Evaluation identified the need for OPE to develop written, consistent guidance for a number of processes that currently occur on an ad hoc basis (e.g., disability access information in electronic meeting invitations and communications to stakeholders and ensuring accessibility of electronic communications). As part of our move to the St. Elizabeths Campus in April 2019, we have been assured that current accessibility standards were a strict construction requirement and have been addressed by the Office of the Chief Readiness Support Officer (OCRSO). OPE will remain vigilant for any unforeseen accessibility issues that emerge in the new location. Last, the Self-Evaluation also indicated that no complaints had been filed against OPE for failure to provide reasonable accommodations to members of the public since OPE's establishment in 2015.

OPE will use the results of the Self-Evaluation as a basis for laying the framework for improvement in the provision of accessibility through the development of OPE-wide plans for conducting programs, meetings, and activities as well as issuing meeting invitations.

## Component Plan to Address Barriers and Gaps

### A. Responsible Staff

***OPE Lead Disability Access Coordinator (DAC):*** Chief of Staff, Office of Partnership and Engagement. Responsibilities: Works with representatives across OPE's sub-offices to serve as the central resource for OPE's compliance with Section 504; coordinates OPE's implementation of Directive 065-01 for its own programs and activities, including completing the Self-Evaluation, and preparing and carrying out the OPE Plan.

The DAC consults and coordinates with the Office of Civil Rights and Civil Liberties (CRCL) when needed to obtain guidance in obtaining reasonable accommodations for meetings, and the Office of Accessible Systems and Technology (OAST) to ensure that electronic communications with members of the public are accessible to individuals with disabilities.

### B. Office of Partnership and Engagement Overview

The Office of Partnership and Engagement (OPE) coordinates the Department of Homeland Security's outreach efforts with critical stakeholders nationwide, including state, local, tribal, territorial (SLTT) governments, SLTT elected officials, SLTT law enforcement, the private sector, and colleges and universities, ensuring a unified approach to external engagement. OPE advocates and represents interests of these stakeholders through the Department's policy-making process and as a conduit for the Secretary to engage with stakeholders or share information. Detailed information about OPE is available at: <https://www.dhs.gov/partnership-engagement>.

### C. Program Interactions

During the initial stages of the Self-Evaluation, the OPE DAC interviewed the leads of all OPE sub-offices to generate a list of the public-facing activities in which they participate or for which they are responsible. (*See Appendix A*) Listed below are examples of OPE's major public-facing activities:

- Communication with the public through stakeholder meetings, in person and by phone;
- Email communication with stakeholders;
- Open Federal Advisory Committee meetings (specifically the Homeland Security Advisory Council (HSAC));
- Communication with the public through the OPE website; and

- Occasional in-person meetings and speaking events with stakeholder groups at government and non-government sites.

On the occasions that OPE staff provide technical assistance to stakeholders, such as to participate in the development of public awareness products, OPE will ensure that its furnished products and those that are created in partnership with OPE are in compliance with Section 508 of the Rehabilitation Act which requires accessibility of electronic information and materials produced by federal agencies.

#### D. Addressing Existing Policy Gaps and Barriers

DHS Directive 065-01 established a policy that affirms the Department's commitment to the nondiscrimination obligations of Section 504, which applies to all OPE-conducted programs and activities:

1. OPE will ensure nondiscrimination based on disability in its conducted programs and activities, and for OPE to provide equal opportunity for qualified individuals with disabilities served or encountered in its conducted programs and activities, through:
  - a. Program accessibility, including by providing equal opportunity to access programs, services, and activities and delivering these in the most integrated setting appropriate to the individual's needs;
  - b. Physical access to OPE work space, in accordance with the Architectural Barriers Act of 1968 (as amended) and the Department's Section 504 regulation; and
  - c. Effective communication, including by providing auxiliary aids and services for persons who are deaf or hard of hearing or are blind or have low vision, and by modifying practices and materials to ensure effective communication with persons with intellectual or developmental disabilities.
2. OPE will provide any necessary modifications to afford a qualified individual with a disability the ability to fully participate in the meeting or activity, 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 OPE.
3. OPE will identify the need for reasonable accommodations and modifications through various communication protocols, such as Federal Register notices and electronic meeting notifications. In ensuring effective communication with individuals with disabilities, it is the policy of OPE to give primary consideration to the auxiliary aid requested by the individual with the disability.

For more information about the nondiscrimination obligations of Section 504 and about DHS Directive 065-01, please visit <https://www.dhs.gov/disability-access-department-homeland-security#content>.

## E. Program Accessibility

Listed below are the OPE methods to improve access to programs and activities for individuals with disabilities in the most integrated setting appropriate.

- Improvement in verifying the accessibility of off-site meeting venues where OPE staff are speaking or co-hosting meetings;
- Identifying accessibility to the building in which OPE offices are leased, such as a wheelchair accessible ramp and automatic door opener at entrance/exit doors.
- Ensuring OPE staff are properly trained on effective interaction with people who have disabilities, including proper utilization of available telecommunication relay services.
- Available video-conferencing at several locations throughout OPE office space.

## F. Interaction Procedures/Protocols

Listed below is the OPE process for modifying existing or developing new procedures or protocols to improve access for individuals with disabilities who attend meetings hosted by OPE:

- Issuance of guidance to OPE employees on conducting accessible meetings which describes protocols for ensuring equal access to meetings and for interacting with persons with disabilities, and its distribution, along with resources such as CRCL's *A Guide to Interacting with People Who Have Disabilities*, which is designed to assist DHS personnel, contractors, and grantees in their interactions with people who have disabilities; and
- At a minimum of yearly, train all OPE staff in the area of compliance with Section 504 in OPE conducted activities.

## G. Reasonable Accommodation Policies/Procedures

Listed below is OPE's plan for modifying existing or developing new policies and procedures for providing reasonable accommodations and modifications to qualified individuals with disabilities.

- Issuance of reasonable accommodations guidance to OPE staff, which will outline the steps to take upon receipt of requests for reasonable accommodations from individuals with disabilities who plan to attend OPE sponsored meetings. Guidance will include:
  - An introduction and overview of OPE's obligation under the Rehabilitation Act to ensure equal access to public-facing programs and activities for individuals with disabilities;
  - Information on the interactive process and how it relates to the provision of reasonable accommodations;
  - A description of the process to be followed when a request for a reasonable accommodation is received;

- Identification of key staff who will assist in obtaining a reasonable accommodation; and
- A method of tracking all requests for reasonable accommodations received and how each request was handled.

## H. Auxiliary Aids and Services Policies/Procedures

Listed below is OPE’s plan for modifying existing or developing new policies and procedures to furnish auxiliary aids and services to ensure effective communication for qualified individuals with disabilities.

- Issuance of guidance to OPE employees on conducting accessible meetings. This guidance:
  - Lists and describes various types of auxiliary aids and services;
  - Contains specific steps to obtain each of these aids and services; and
  - Lists points of contact within the office who may be of assistance in obtaining these aids and services.

## I. Dissemination of Policies and Procedures

Listed below is OPE’s plan to make resources related to Directive 065-01 more readily available to OPE personnel who interact with or provide information to the public in meetings, Federal Advisory Committee meetings, and other activities:

- Upon completion and approval of the guidance that OPE develops subsequent to the OPE Self-Evaluation, OPE will disseminate these materials to OPE staff electronically. Examples of other materials are:
  - Directive 065-01;
  - OPE’s Plan for Improving Access to Office of Partnership and Engagement Public-Facing Programs and Activities for Individuals with Disabilities;
  - OPE’s adaptation of CRCL’s Guidance for Conducting Accessible Meetings (*See Appendix B*);
  - OPE-issued “job aids” that outlines specific steps OPE staff will take to provide accessible communication and other reasonable accommodations for individuals with disabilities who interact with OPE (*See Appendix D*); and
  - The link to the DHS Disability Access web site hosted by CRCL.
- OPE will provide training to OPE staff as required by CRCL as noted in the section below.

## J. Training

OPE will take the following steps to provide training to managerial and program staff on disability access responsibilities:

- The DAC, as the OPE COS, will distribute training requirements to OPE staff using the methods described below:
  - For all new staff, including contractors and interns, OPE will require training and/or orientation on OPE's Section 504 obligations related to program, physical, and communication access. This will include an introduction to the Guidance on Accessible Meetings and OPE's guidance for interacting with people with disabilities.
  - OPE will require training for staff on a recurring basis, at a minimum yearly, and distribute necessary tools and job aids. This training will also include training on the use of auxiliary aids and services as necessary.

## K. Notification to the Public

OPE will take the following steps to provide and/or improve how it provides notice to key stakeholders of their rights under Section 504 and how to file a complete complaint under Section 504:

- Include a tag line in all OPE meeting or teleconference invitations and other electronic newsletters and distributions about how to request a reasonable accommodation to attend or participate in OPE sponsored meetings. (*See Appendix C*)
- Post reasonable accommodation information to attend or participate in OPE meetings and teleconferences on OPE's webpage. (*See Appendix C*)

## L. Resources

OPE is committed to providing the resources necessary to ensure compliance with Section 504 and implementation of this Plan with respect to individuals with disabilities OPE encounters and serves. OPE has resources in place to provide reasonable accommodations and auxiliary aids and services as requested by stakeholders or members of the public who have disabilities. As noted above, it is the policy of OPE to provide any necessary modifications to afford a qualified individual with a disability full access to participate in a meeting or teleconference, 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 OPE.

## M. Implementation Steps

### 1. Immediate actions to address policy gaps and barriers following OPE's Self Evaluation

To address the results of its Self-Evaluation, OPE will improve access to OPE programs and activities. These actions include but are not limited to:

- Utilize the CRCL's Guidance to Conducting Accessible Meetings. The guidance provides instructions and tips for staff on ensuring that all meetings and events conducted by OPE are accessible to stakeholders with disabilities.



- Initiate a plan to partner with CRCL to train OPE staff on conducting accessible meetings.
- Provide instructions to OPE staff on the proper utilization of available telecommunication relay services to interact with people with speech or hearing disabilities.
- Develop a standardized “tag line” for requesting reasonable accommodations to be used across OPE when issuing invitations to meetings, teleconferences, newsletters and events that include OPE stakeholders and members of the public.

## 2. Timeframes, milestones, and responsible parties associated with the steps OPE will take in implementing the remaining action items described in this Plan.

### A. Policy Barriers (Section D above)

- Socialize and utilize CRCL’s *Guidance for Conducting Accessible Meetings*.
  - Responsible Staff: OPE DAC and sub office leads, with support from OPE front office staff
  - Status: Discontinued. *(See Appendix B for OPE’s adaptation of CRCL’s Guidance for Conducting Accessible Meetings)*
- Implement training modules for OPE staff on OPE’s obligations to ensure accessibility for stakeholders and/or members of the public with disabilities to be delivered to staff, including contractors and interns.
  - Responsible staff: OPE DAC, with support from OPE front office staff
  - Timeline: **February 28, 2020**

### B. Program Accessibility (Section E above)

- Insert tag line into all external OPE invitations to in-person or telephonic meetings to ensure accessibility for stakeholders and members of the public. *(See Appendix C)*
  - Responsible Staff: OPE DAC, with support from OPE front office staff
  - Status: Underway
- Verify with Office of the Chief Security Officer Organization(OCSO) and Federal Protection Service (FPS) emergency drill information for all visitors to OPE, including those with disabilities.
  - Responsible staff: OPE DAC, in collaboration with OCSO and (FPS)
  - Timeline: Completed **June 24, 2019**
- Provide instructions to OPE staff on the proper utilization of available telecommunication relay services to interact with people with speech or hearing disabilities, including proper utilization of available telecommunication relay services.
  - Responsible Staff: OPE DAC, with support from OPE front office staff
  - Status: Completed **December 2019**

### **C. Dissemination of Policies and Procedures** (Section I above)

- Upon completion of the development of key documents noted in this Plan and upon approval, the OPE DAC, with support from OPE front office staff will provide the following policies, procedures, and guidance to staff electronically and in hard copy, as needed:
  - *OPE Guidance for Conducting Accessible Meetings* (See Appendix B)
  - OPE's Plan for Improving Access to Office of Partnership and Engagement Public-Facing Programs and Activities for Individuals with Disabilities.
  - OPE-issued "job aids" that outlines specific steps OPE staff will take to provide accessible communication and other reasonable accommodations for individuals with disabilities who interact with OPE. Specifically include verbiage for all stakeholder meeting invitations or external OPE publications on requesting reasonable accommodations and access. (See Appendix D)
  - Responsible staff: OPE DAC, with support from OPE front office staff
  - Timeline: Development, dissemination, and training to be completed by: **December 31, 2019**

### **D. Training** (Section J above)

- The OPE DAC with support from OPE front office staff will promote training on conducting accessible meetings for OPE staff via OPE sub office leads.
  - Responsible staff: OPE DAC, with support from OPE front office staff
  - Timeline: Training to be completed by: **December 31, 2019**
- Provide instructions to OPE staff on the proper utilization of available telecommunication relay services to interact with people with speech or hearing disabilities, including proper utilization of available telecommunication relay services.
  - Responsible staff: OPE Front Office staff
  - Timeline: Completed **December 2019**
- Discussion between OPE DAC, with support from OPE front office staff, and the OPE Contracting Officer (CO) on appropriate contract language regarding Section 504 obligations as well as training of contract personnel.
  - Direct OPE staff and contract personnel to receive guidance and instruction from the GSA site: <https://www.section508.gov/training> to improve understanding of IT accessibility and the Section 508 law, at a minimum of annually; and to access <https://www.section508.gov/create> for tools to create accessible digital products.
  - Responsible staff: OPE DAC, with support from OPE front office staff
  - Timeline: Discussion to occur by **February 28, 2020**

### **E. Notification to the Public** (Section K above and Appendix C)

- Begin use of tag line for all external OPE invitations to in-person or telephonic meetings to ensure accessibility for stakeholders and members of the public.
- Post information on requesting reasonable accommodations when visiting OPE office or attending OPE meetings, and information on how to file a complete complaint under Section 504, on OPE webpage.
- Post information on OPE webpage (and any corresponding websites for OPE sub-offices) that informs individuals on how to request OPE materials in alternate formats, or more generally, how to request auxiliary aids and services from the Department.
  - Responsible staff: OPE DAC, with support from OPE front office staff
  - Timeline: Notification actions to be completed by **December 31, 2019**

# APPENDIX A

## **OPE Public-Facing Programs and Activities**

- Communication with the public through stakeholder meetings, in person and by phone
- Email communication with stakeholders
- Open Federal Advisory Committee meetings (specifically the Homeland Security Advisory Council (HSAC))
- Communication with the public through the OPE website (website in progress)
- Occasional in-person meetings with stakeholder groups at government and non-government sites.
- Interaction with members of the public who are applicants for employment or former employees
- Outreach / Training
  - Verbal presentations
  - Written presentations
  - Handouts
- OPE Office for State and Local Law Enforcement monthly newsletter
- OPE web content on DHS.gov
- OPE phone line
- Participating as speakers in conferences, roundtables, and other events that interface with the public.
- Conducting committee member training on the Federal Advisory Committee Act (FACA)

## APPENDIX B

- OPE Guidance for Conducting Accessible Meetings

# APPENDIX C

## Additions to the OPE Webpage

As part of the Office of Partnership and Engagement's (OPE) ability to address online compliance, OPE will be adding a landing page on the home website which will read:

- The Department of Homeland Security Office of Partnership and Engagement is committed to providing accessible Information and Communication Technology (ICT) to individuals with disabilities, including members of the public and federal employees, by meeting or exceeding the requirements of [Section 508 of the Rehabilitation Act of 1973](#), as amended (29 U.S.C. 794d). Section 508 requires agencies, during the procurement, development, maintenance, or use of ICT, to ensure that individuals with disabilities have access to and use of ICT information and data comparable to the access and use afforded to individuals without disabilities (i.e., "ICT accessibility"), unless an undue burden would be imposed on the agency. The Section 508 standards are the technical requirements and criteria that are used to measure conformance with the law and incorporate the W3C Web Content Accessibility Guidelines (WCAG) 2.0. More information on Section 508 and the technical standards can be found on [Section508.gov](#).
- If you have feedback, questions, or concerns relating to the accessibility of any content that interferes with your ability to access the information on the Department of Homeland Security's website, please contact [Website Issues](#) for assistance.
- If you believe that the Information and Communication Technology (ICT) used by the Department of Homeland Security does not comply with Section 508 of the Rehabilitation Act, please go to the [DHS Accessibility Website](#) for instructions on how to file a formal complaint.
- To enable us to respond in a manner most helpful to you, please indicate the nature of your accessibility problem, the preferred format in which to receive the material, the web address (URL) of the material with which you are having difficulty, and your contact information.
- If you have comments and/or questions related to the agency's Section 508 program, please contact the [Office of Accessible Systems & Technology](#)

### **Insert to OPE External Communications**

The below language will be included into all external OPE communications, to include: emails, newsletters, and public notices:

- “The Department of Homeland Security is committed to providing accessible Information and Communication Technology (ICT) to individuals with disabilities, including members of the public and federal employees, by meeting or exceeding the requirements of Section 508 of the Rehabilitation Act of 1973. If you have feedback, questions, or concerns relating to the accessibility of any content that interferes with your ability to access the information contained or attached to this email or on the Department of Homeland Security's website, please contact [Website Issues](#) for assistance. If you believe that the Information and Communication Technology (ICT) used by the Department of Homeland Security does not comply with Section 508 of the Rehabilitation Act, please go the [DHS Accessibility Website](#) for instructions on how to file a formal complaint.”

# APPENDIX D

## OPE Supplemental “Job Aids”

- 1. Communicating with Persons with Disabilities
- 2. Increasing Access for Members of the Public with Disabilities
- 3. Interacting with Persons with Service Animals
- 4. Providing Disability Accommodations for the Public





# **U.S. Department of Homeland Security Office of Partnership and Engagement**

## **Guidance for Conducting Accessible Meetings**

*December 2019*

OPE Disability Access Coordinator (DAC) for External-facing Programs:

Karinda Washington

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202-612-1602

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# I. Introduction

The Department of Homeland Security (DHS) Office of Partnership and Engagement (OPE) is committed to ensuring that all members of the public who participate in OPE meetings and events have equal access to these programs regardless of the presence of a disability. This guidance supports OPE's obligations to comply with Section 504 and Section 508 of the Rehabilitation Act as well as DHS Directive 065-01, *Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities* (Non-Employment).

Whether or not an OPE meeting planner receives a request for a reasonable accommodation, it is important for OPE staff to think ahead about all aspects of a meeting so that there are no barriers present that could potentially create a negative impact on the full participation of a person with a disability in attendance.

Not all the accommodations described in this guidance are required at all times; moreover, the failure to take one of the steps below does not necessarily mean there is a violation of Section 504. That said, upon a request for a reasonable accommodation from a meeting participant, it is OPE's obligation to address the request. Specific steps for obtaining various reasonable accommodations are listed below beginning on page 6 of this document.

## II. What Does "Accessibility" Mean for Meetings and Events?

Before going into the steps for ensuring access to an OPE meeting, the following provides an overview of key principles of accessibility to keep in mind. Generally speaking, providing accessibility means affording individuals with disabilities who are meeting participants with:

- The same opportunity to participate in the meeting as those without disabilities (***Equal Opportunity***);
- The same right to participate in the meeting in the same manner as those without disabilities (***Inclusion***);
- The opportunity to participate in the meeting in a setting that allows for convening those with and without disabilities together rather than convening individuals with disabilities separately (***Integration***);
- The opportunity to choose the most appropriate/preferred reasonable accommodation that will allow for full participation in the meeting (***Self-Determination***);
- The provision of notice regarding availability of reasonable accommodations, the opportunity to request and receive a preferred reasonable accommodation to allow for full participation in the meeting, and the provision of auxiliary aids and services and/or alternative forms of communication as needed (***Effective Communication***);
- The ability to request and receive a "unique" or not commonly anticipated aid or service that is the preferred accommodation (***No One Size Fits All***);
- No charge for provision of reasonable accommodations (***No surcharges***).

When considering the provision of reasonable accommodations in OPE's public-facing activities, please note that the DHS Section 504 regulation, 6 C.F.R. Part 15: *Enforcement of*

*Nondiscrimination on the Basis of Disability in Programs or Activities Conducted by the Department of Homeland Security*, requires that the Department make accommodations and modifications that would allow access for individuals with a disability to a DHS program or activity unless it can demonstrate that an action (i.e., accommodation, auxiliary aid or service, or modification to policy, practice, or procedure) would result in a fundamental alteration in the nature of the program or activity or in undue financial and administrative burdens (fundamental alteration or undue burden) (6 C.F.R. Secs 15.50 and 15.60). [DHS Directive 065-01](#) also covers these principles.

OPE staff and contract personnel are directed to receive training to improve understanding of IT accessibility and the Section 508 law, at a minimum annually from the GSA site: <https://www.section508.gov/training>; and to access <https://www.section508.gov/create> for tools to create accessible digital products, per OPE's *Plan for Improving Access to Office of Partnership and Engagement Public-Facing Programs and Activities for Individuals with Disabilities* (December 2019).

### **III. Examples of “Reasonable Accommodations” for Meetings and Events**

Beyond planning ahead for overall physical, programmatic, and communication access, the meeting organizer might receive a specific request from one or more meeting attendees for disability-related accommodations. Examples of accommodations include, but are not limited to:

- Arranging for qualified sign language interpreters and/or on-site captioning;
- Producing alternate formats of print materials in braille, large print, and/or in an electronic format;
- Providing remote conference captioning services; and
- Furnishing a temporary ramp to access the dais or other areas with one or more stairs to ensure accessibility for individuals who have physical disabilities and may be using a wheelchair or walker.

See the section entitled *Other Types of Reasonable Accommodations and How to Obtain Them* for guidance on making arrangements to provide these and other accommodations.

### **IV. Steps for Ensuring Accessible Meetings and Events**

#### **1. Planning the Meeting**

Provide information in the meeting announcement about how to request an accommodation and any timelines for making this request. Use the following or similar language in your meeting invitations:

*If you require a reasonable accommodation to [participate in the meeting] (e.g., an ASL interpreter, captioning, Braille, or large print), please contact [xxx] by email at [xxx] or by phone at [xxx] no later than [xxx].*

Once the arrangements for sign language services have been made, provide the meeting attendee with the name, phone number, and/or email of the person who will be providing the assistance.

- Provide a copy of the agenda and written materials that the presenters will show or distribute prior to the meeting.
- The meeting announcement, agenda, and written materials for the meeting must be accessible to all individuals, therefore, take steps to make the material accessible. This can be achieved by using a variety of resources for creating and reviewing the accessibility of electronic documents. These resources include:
  - Information on the GSA Section 508 webpage\_  
<https://www.section508.gov/content/build/create-accessible-documents>
  - Adobe accessibility check. To test for accessibility of your documents, run an accessibility check in Adobe. Go to “Tools,” then “Accessibility,” then “Full Check,” then “Select All,” then “Start Checking.” The report will identify any accessibility issues in the file. If you need assistance with making your Adobe PDF file accessible, please send it to OAST via the Accessibility Help Desk ([Accessibility@hq.dhs.gov](mailto:Accessibility@hq.dhs.gov)) as described below.
  - The DHS Office of Accessible Systems and Technology (OAST) helpdesk at [Accessibility@hq.dhs.gov](mailto:Accessibility@hq.dhs.gov), or OAST staff at 202-447-0440. When there is a need for review and/or remediation, provide materials to OAST for remediation well in advance of the meeting. Requests for assistance from OAST should be made at least two weeks in advance of a meeting.
- In the event that materials are not available in an accessible format for a meeting, staff should consult with their supervisors about options for proceeding with the meeting, including other possible ways to make the materials accessible, refraining from using or distributing material that is not accessible at the meeting, eliminating the portion of the meeting that would have relied on the use of the inaccessible materials, and cancelling the meeting altogether.
- Ensure that all videos that will be used during the meeting are captioned and audio described.
- Any signs posted about the meeting should be in large print and use contrasting colors for ease of reading. All posted signs related to the meeting should be accompanied by issuing accessible electronic notices concurrently with posting the signs.
- Notify any presenters that:
  - All meeting-related materials they will provide to participants must be accessible (available in alternate formats if requested and 508 compliant if electronic).
  - If graphics are included in the presentation, speakers need to describe the content of the graphics.
  - All participants should introduce themselves before speaking and speak clearly and at a moderate pace for ease of communication, especially if the meeting has captioning or sign language interpreting.
- If OPE is providing the transportation to the meeting location, consider the need for accessible transportation.

## 2. Selecting the Meeting Location

**When holding the meeting at St. Elizabeths (Washington, DC), consider the following factors:**

- The St. Elizabeths Campus Visitor Center at Gate 4 is fully accessible. This entrance has an automatic door opener for those who need it and security staff are present to help as needed.
- There is a grassy area just outside of the patio perimeter at Gate 4 entrance that has been designated as the service animal relief area.
- There is accessible Visitor Parking in the Gate 4 Parking Garage. Parking must be requested in advance by your meeting sponsor.
- There are two fully accessible internal campus shuttles available for campus employees and visitors. The shuttles pick up and drop off at various points around the campus including the Gate 4 Visitor Center, Gate 4 Parking Garage, and all buildings.
- All building entrances have ramps and there are security guards present to both screen visitors and assist in opening doors for those who need assistance.
- Seating and tables should be arranged so that there is adequate space for individuals with mobility disabilities to move about without obstruction.
- There should be adequate space for service animals in the meeting room. Allow for space under or next to the tables where animals can lay down and not be disturbed or stepped on. If aisle space is being used, ensure there is sufficient room for those using mobility devices to pass without running into the animal.
- If a podium will be used, try to have an adjustable height podium so that all presenters will be visible to the audience. If the podium is not adjustable, use a table with a microphone. If a hand-held microphone will be used during the meeting, also have a lavalier (clip on microphone) available for presenters who may need one.
- Secure microphone or other electrical wires so that no one will trip on them.
- Registration tables, if used, should be at appropriate heights and have sufficient space for participants who are maneuvering a wheelchair (no higher than 36 inches from the floor).

**When holding the meeting at another location, consider the following points:**

- When presenting at a meeting or roundtable hosted by an entity other than OPE, communicate with the host ahead of time to request that the site be accessible, to include the same general accessibility considerations taken when holding the meeting at the OPE site.
- Verify that restrooms are accessible.
- Verify that the location is near public transportation and has accessible parking spaces.

**When holding the meeting via conference call, consider the following points:**

- Make any arrangements for captioning that have been requested and share that information electronically with all participants prior to the call (Instructions are outlined below).
- Remind all speakers to identify themselves prior to each time they speak and ask that they speak slowly and clearly.

- Request that participants who are not speaking mute their phones unless they wish to speak to reduce static and other noise interference.

### 3. Conducting the Meeting

- Announce emergency evacuation plans for the meeting site at the start of the meeting.
- Place any handouts near the edge of tables for easier access.
- Inform participants of the location of accessible restrooms and service animal relief areas.
- Design the agenda so that regular breaks are provided for participants, presenters, and any service providers present. Allow sufficient time for service animals to take a break.
- The timeframe for participant breaks and lunch should be determined with consideration of the environment in mind (e.g., location of restrooms, travel time to and proximity of restaurants.)
- Request that participants identify themselves by name and note their organizational affiliation at the beginning of the meeting and whenever speaking to the group.
- Encourage all individuals to speak clearly, one at a time, and at a moderate pace so that all attendees can participate effectively in the meeting.

## V. Other Types of Reasonable Accommodations and How to Obtain Them

### A. Remote Conference Captioning for Conference Calls

Conference captioning is a way to make a conference call accessible to deaf and hard of hearing participants. It consists of a professional captioner joining the conference call, listening to the discussion, and typing the discussion word for word so that the deaf participant can follow on his or her computer and participate in the discussion. Make arrangements for captioning at least twenty-four hours in advance of a call.

Steps for obtaining remote conference captioning:

1. Set up a conference call audio bridge. Send an email to the help desk (IT Support at [itsupport@hq.dhs.gov](mailto:itsupport@hq.dhs.gov)) or call at 1-800-250-7911 requesting that they set up for OPE an unclassified audio bridge with the following specifications:
  - Event: (Name of event/meeting)
  - Date:
  - Time:
  - Number of participants:

Once you have received the conference call number and PIN, then go to the next step below.

2. Secure relay conference captioning service for the event. To set up conference captioning, go to <http://www.fedrcc.us/fedrcc/> and do the following:
  - Click “Book an event.”



- Complete the form with applicable info including the conference call number and PIN you received from IT Support in Step 1 above.
  - Note that when it asks for our agency code, you will have a dropdown menu to choose from, our OPE code is 7010 in the listing. (This is to assign the cost of the captioning to the appropriate agency.)
  - When asked about retaining the transcript, select “retain transcript on server” and also select “allow participants to view and save transcript.”
3. You will receive an email from the RCC service confirming your booking. In this email, there will be a URL which the deaf or hard of hearing participant needs to access the captioning session for the meeting.
  4. Place the conference call dial in and captioning information within the calendar invitation to be sent out for the meeting/event.
  5. One day after the meeting, send a reply to the email message from the captioning company and request the transcript from the meeting. This transcript can be kept for your records.

To obtain the accommodations listed below, please contact the Headquarters EEO office at 202-357-7700 or via email at [accommodations@hq.dhs.gov](mailto:accommodations@hq.dhs.gov).

To address public-facing meeting-related reasonable accommodation requests that are not listed here, please consult with the OPE DAC, Karinda Washington at [Karinda.Washington@hq.dhs.gov](mailto:Karinda.Washington@hq.dhs.gov) or Staci M. Johnson, OPE at [staci.m.johnson@hq.dhs.gov](mailto:staci.m.johnson@hq.dhs.gov).

## B. Qualified Sign Language Interpreters

A qualified sign language interpreter is an individual who is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary vocabulary. Individuals who are deaf or hard of hearing often request sign language interpreters as an accommodation. In addition to contacting Ms. Washington for assistance in obtaining qualified interpreters, you should:

- Make the request two weeks in advance of the meeting; last minute requests will be pursued but may not be fulfilled. Provide select meeting-related materials for the interpreter ahead of the meeting so that the interpreter can develop familiarity with the subject matter.
- Contact the interpreter ahead of the meeting regarding room arrangement and expectations. The interpreter needs to know ahead of time he/she will be expected to begin work the moment that person arrives at the building.
- During the meeting, ensure that the sign language interpreter is clearly visible to the participants who need to see him/her.



### C. Live Event Captioning (Also called CART Captioning)

CART refers to Communication Access Realtime Translation. It is a speech-to-text interpreting service for anyone who needs communication access, for any important large audience, for having a record of proceedings, and more. It also benefits people who have a hearing loss, are deaf, and others with different language and learning needs. A certified CART provider types on a steno machine as others are speaking and the text appears on an individual's laptop or it can be projected onto a screen. The individual requires no special software to view the text. Additional information on CART can be found at: <https://www.nad.org/resources/technology/captioning-for-access/communication-access-realtime-translation/>.

### D. Video Remote Interpreting (VRI)

Video Remote Interpreting (VRI) is the on-demand service that provides communication between deaf or hard-of-hearing persons and hearing persons that are in the same location, utilizing an interpreter by way of a computer with a webcam and Internet connection or a tablet using a cellular connection. For more information, visit: <https://signlanguage.com/vri/>

### E. Assistive Listening Devices

Assistive listening devices are used to assist individuals who have hearing limitations that prevent them from engaging in effective communication with hearing individuals. They accomplish this by allowing an individual to amplify sounds in their environment to a volume they are able to perceive. Assistive listening device can work with or without hearing aids, depending on the specifications of the product and the requirements of the individual. Additional information on assistive listening devices can be found at: <http://www3.gallaudet.edu/clerc-center/info-to-go/assistive-technology/assistive-technologies.html>.

### F. Large Print Materials

Large print is at least an 18 point, and preferably a 20 point, bold, sans serif, mono or fixed space font. Although large print can be produced using standard office printers, there are several guidelines which should be followed regarding the spacing, font size, contrast, font style, and paper quality for the document. Additional information on large print materials can be found at: <http://acb.org/large-print-guidelines>.

### G. Braille Materials

Braille is a system of touch reading and writing in which the alphabet is represented by the arrangement of six dots in a space called a cell. Braille is typically printed on specialized paper using a braille embossing machine. Additional information about braille can be found at: <https://nfb.org/braille-general>.

## VI. Other Suggestions

For events/meetings at which there will be a large number of participants from the general public who have not had an opportunity to notify you ahead of time regarding the need for a reasonable accommodation, have on hand several CDs or thumb drives that have all the handouts in accessible electronic formats, a few copies in large print format, and one or two copies in braille format.

## VII. More Information and Additional Resources

The Department of Homeland Security is committed to providing accessible Information and Communication Technology (ICT) to individuals with disabilities, including members of the public and federal employees, by meeting or exceeding the requirements of Section 508 of the Rehabilitation Act of 1973. If you have feedback, questions, or concerns relating to the accessibility of any content that interferes with your ability to access the information contained within this document or on the Department of Homeland Security's website, please contact [Website Issues](#) for assistance. If you have comments and/or questions related to the agency's Section 508 program, please contact the [Office of Accessible Systems & Technology](#) (cc the OPE DAC and the below POC)

- OPE Disability Access Coordinator:
  - Name: Karinda Washington, OPE Chief of Staff
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  - Phone: 202-612-1602
- Additional POC
  - Name: Staci Johnson, OPE Senior Advisor
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# Office of Partnership and Engagement

## Communicating with Persons with Disabilities

### BACKGROUND

A person with a disability is someone who has a physical or mental impairment that substantially limits one or more major life activities. Some persons with disabilities, such as those who are blind or have low vision, who are deaf or hard of hearing, who are unable to speak, who have brain injuries, or who have intellectual disabilities or mental illness may face challenges in communicating.

To ensure effective communication in accordance with federal civil rights law and Department of Homeland Security (DHS) policy, the Office of Partnership and Engagement (OPE) gives primary consideration to the auxiliary aid requested by the person who has a communication disability. The key is engaging in an individualized and interactive process with the person and honoring their preference 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 DHS. When deciding what aid or service is needed to communicate effectively, staff should consider the nature, length, and complexity, and the context of the communication as well as the person's normal method(s) of communication. Supervisors should be consulted as needed.

The goal is to ensure that communication with persons with disabilities is equally effective as communication with persons without disabilities. The following sections provide suggestions to facilitate effective communications:

### BLIND OR LOW VISION

- Verbally identify yourself and others when approaching someone who is blind or visually impaired;
- Provide documents in alternative formats, such as Braille or large print versions, when available;
- Provide verbal explanations for processes;
- If the person has a guide animal, stay on the side opposite the animal and do not touch or distract the animal

### DEAF OR HARD OF HEARING

- When interacting with a person who is deaf or hard of hearing, look directly at the person and speak clearly, naturally, and slowly to establish whether the person can speech read. Persons who can speech read rely on facial expressions and other body language to aid understanding;
- Offer the person a way of exchanging written messages to facilitate the communication process;
- Do not rely on an accompanying individual to interpret (unless specifically authorized by the deaf person) and do not rely upon a minor to interpret unless there is an imminent emergency;
- Evaluate whether a sign language interpreter may be necessary to ensure effective communication, such as the complexity of interactions, or for discussions involving legal, medical, safety, or eligibility matters; and
- When using a sign language interpreter, look at and speak to the person who is deaf

### SPEECH DISABILITY

- Listen attentively. Keep your manner encouraging rather than correcting. Exercise patience rather than attempting to speak for a person with a speech disability;
- Never pretend to understand if you are having difficulty doing so. Repeat what you understand, or

- incorporate the person's statements into the follow-up questions to verify understanding; and
- When possible, ask short questions that require short answers or a nod or a shake of the head.

## NON APPARENT DISABILITIES<sup>1</sup>

- A person's disability may not be readily apparent and people with a brain injury, epilepsy, mental illness, autism, or developmental disability may exhibit behaviors or ways of communicating that can appear unusual;
- Be aware of the possible need to speak to the person in clear and short sentences. Repeat your information and your questions, as needed;
- It may be helpful to offer assistance completing forms or explaining written instructions, and provide extra time for decision-making;
- People with brain injuries may have a loss of muscle control or mobility that is not obvious, such as a person who may not be able to sign forms, even though she can move her hand; and
- Be very cautious about seeking the assistance of the person's companion, caregiver, or personal assistant. While this individual may be able to assist you with communication and interpreting the person's meaning and/or responding to behaviors, it is important to communicate directly with the person with a disability as much as possible. This can be vital in disrupting exploitation or trafficking of persons who are unable to speak for themselves or are being intimidated.

## ADDITIONAL TOOLS AND RESOURCES

- DHS [Directive 065-01](#) *Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-employment)*
- DHS [Instruction 065-01-001](#) *Nondiscrimination for Individuals With Disabilities In DHS-Conducted Programs And Activities (Non-Employment)*
- DHS: [A Guide to Interacting with People who have Disabilities](#)
- DHS Office of Partnership and Engagement, Plan for Improving Access to OPE Public-Facing Programs and Activities for Individuals with Disabilities
- DHS Office of Partnership and Engagement, Guidance for Conducting Accessible Meetings

## FOR MORE INFORMATION

The Department of Homeland Security is committed to providing accessible Information and Communication Technology (ICT) to individuals with disabilities, including members of the public and federal employees, by meeting or exceeding the requirements of Section 508 of the Rehabilitation Act of 1973. If you have feedback, questions, or concerns relating to the accessibility of any content that interferes with your ability to access the information contained within this document or on the Department of Homeland Security's website, please contact [Website Issues](#) for assistance. If you have comments and/or questions related to the agency's Section 508 program, please contact the [Office of Accessible Systems & Technology](#) (cc the OPE DAC and the below POC)

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<sup>1</sup> Non-apparent or invisible disabilities can be defined as a physical, mental or neurological condition that limits a person's movements, senses, or activities but are invisible to others. Examples of such conditions include arthritis, cancer, asthma, diabetes, brain injury, epilepsy, mental illness, autism, or developmental disabilities. Symptoms may include debilitating pain, fatigue, dizziness, cognitive dysfunctions, brain injuries, learning differences and mental health disorders, as well as hearing and vision impairments.



# Office of Partnership and Engagement

## Increasing Access for Members of the Public with Disabilities

### BACKGROUND

The Office of Partnership and Engagement (OPE) is committed to providing individuals with disabilities an equal opportunity to participate in, and have access to, the programs and activities conducted by OPE<sup>1</sup>. Equal access is advanced when meetings and activities engaging the public are planned in accessible spaces, when materials for the public are generated in accessible formats and when event facilitators take steps to ensure that participants speak at a moderate pace and one at a time. In addition, OPE must take action to ensure that members of the public with disabilities are provided accommodations to allow access to OPE meetings and activities unless the modification would result in a fundamental alteration in the nature of the program, service, or activity, or in undue financial and administrative burdens. Meeting planners should consider each person's need for accommodation in an individualized manner. Reasonable advance notice may be requested from people requesting aids or services based on the length of time needed to acquire the aid or service, but excessive advance notice requirements should not be imposed. Additionally, "walk-in" requests for aids and services should also be honored to the extent possible. Supervisors should be consulted as needed.

### STATEMENT ON MEETING/EVENT ANNOUNCEMENT

Meeting and event announcements should include an accessibility statement such as:

"If you require an accommodation to attend this meeting, please call (*meeting organizer*) at (*phone number*) or send an email to (*insert email address or link to the word email*) at least (#) working days prior to the meeting."

### SERVICE ANIMALS

A service animal is a dog that has been individually trained to do work or perform tasks for an individual with a disability. If a person arrives with a service animal, ensure that there is enough space beside their seat for the animal to sit or rest during the event. In situations where it is not obvious that a dog is a service animal, the following questions may be asked:

- Is the dog a service animal required because of a disability? and
- What work or task has the dog been trained to perform?

**Requesting documentation for the dog, requiring the dog demonstrate its task, or inquiring about the nature of the person's disability is prohibited by civil rights law.** Although it is the handler's responsibility for care and supervision of the service animal, it is also helpful to inform visitors of the location of relief areas for service animals.<sup>2</sup>

### EFFECTIVE COMMUNICATION

Information provided (electronic or print) should be available upon request in alternative formats, which can include

<sup>1</sup> Section 504 of the Rehabilitation Act of 1973, codified at 29 U.S.C. § 794, provides that "No otherwise qualified individual with a disability in the United States ... shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination ... under any program or activity conducted by any Executive agency ..."

<sup>2</sup> Pursuant to U.S. Department of Justice guidance for State and local governments, businesses, and nonprofit organizations that serve the public, allergies and fear of dogs are not valid reasons to deny people the use of a service animal as a reasonable accommodation. For additional guidance on service animal considerations, access the U.S. Department of Justice, Civil Rights Division, publications titled [Americans with Disabilities Act \(ADA\) Revised Requirements: Service Animals](#) and [Frequently Asked Questions about Service Animals and the ADA](#).

large print (18-point font recommended), Braille, or digital storage device and should be Section 508<sup>3</sup> compliant if provided in electronic format. Use sans serif fonts such as Arial or for PowerPoint presentations and printed materials, as this type of font tends to be easier to read. Provide sign language interpreters free of charge. To allow other ways for people with disabilities to participate in events, setting up a phone-in line or video-conferencing session are both good options. Conference captioning is a way to make a conference call accessible to deaf and hard of hearing participants. It consists of a professional captioner joining the conference call to provide a simultaneous written transcript so that the deaf participant can participate in the discussion. This requires setting up a conference bridge call and arranging for conference captioning from the Federal Relay Service. Include the conference call dial in number and captioning information within the calendar invitation sent out for the meeting/event.

## ON SITE ACCESSIBILITY

Locate meetings in accessible spaces. Provide oral or electronic descriptions/maps of meeting room layouts, emergency exit locations, and amenities such as water fountains or bathrooms. Offer assistance to participants who have visual impairments to identify the location of rooms, seating, amenities, and exits. The path to event seating and common areas must be at least 36 inches wide for interior spaces and 44 inches wide for exterior spaces.

## EMERGENCIES

Accessible signage and alarms should make visitors aware of emergency evacuation procedures. In case of emergencies, such as fires or bomb threats, ensure familiarity with emergency evacuation of visitors with disabilities, the use of evacuation chairs or other assistive devices, and the evacuation of visitors' mobility devices and service animals. Be aware of specific emergency preparedness guidance outlined in the Occupant Emergency Plan. Designate staff who will be responsible for assistance with facility evacuation for persons with disabilities who may need such assistance.

## ADDITIONAL TOOLS AND RESOURCES

- DHS [Directive 065-01](#) *Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-employment)*
- DHS [Instruction 065-01-001](#) *Nondiscrimination for Individuals With Disabilities In DHS-Conducted Programs And Activities (Non-Employment)*
- DHS Office of Partnership and Engagement, Plan for Improving Access to OPE Public-Facing Programs and Activities for Individuals with Disabilities
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<sup>3</sup> Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794d), as amended, requires that any person with a disability seeking information or services from a federal agency have access to and use of information and data that is comparable to that provided to persons without disabilities, unless an undue burden would be imposed on the agency.

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## Office of Partnership and Engagement Interacting with Persons with Service Animals

### BACKGROUND

Section 504 of the Rehabilitation Act of 1973 (Section 504) requires federal agencies to provide persons with disabilities with an equal opportunity to participate in, and have access to, the program benefits and services conducted by the Federal Government. The Office of Partnership and Engagement (OPE) will make reasonable modifications to policies, practices, or procedures when necessary to accommodate people with disabilities; including persons with disabilities who use a service animal. Generally, OPE must allow service animals to accompany people with disabilities in all areas of the facility where the public is normally allowed to go. Service animals are not required to wear a vest, ID tag, or specific harness.

#### KEY TERMS:

**Service Animal:** A dog<sup>1</sup> that has been individually trained to do work or perform tasks for a person with a disability. The task(s) performed by the dog must be directly related to the person's disability.

**Emotional Support, Comfort, or Companion Animal:** Animals that provide comfort just by being with a person. Because they have not been trained to perform a specific job or task, they are not considered service animals and could be excluded in some situations, such as meetings or interviews.

**Do Work or Perform Tasks:** The dog must be trained to take a specific action when needed to assist the person with a disability. Examples of such work or tasks include guiding people who are blind, alerting people who are deaf, pulling a wheelchair, alerting and protecting a person who is having a seizure, reminding a person with mental illness to take prescribed medications, calming a person with Post Traumatic Stress Disorder (PTSD) during an anxiety attack, or performing other duties.

### DO

- Verbally identify yourself when approaching someone who is blind or visually impaired.
  - In situations where it is not obvious that a dog is a service animal, the following questions may be asked:
    - 1) Is the dog a service animal required because of a disability?
    - 2) What work or task has the dog been trained to perform?
- Requesting documentation for the dog, requiring the dog demonstrate its task, or inquiring about the nature of the person's disability is prohibited by civil rights law.**
- If a person arrives with a service animal, verbally communicate that service dog collars, harnesses, leashes, backpacks, vests and other items are subject to inspection and that service animals are subject to the same importation regulation as any other dogs including requiring a certificate of rabies vaccination.

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<sup>1</sup> While OPE personnel will in most cases encounter dogs as service animals, Section 504 of the Rehabilitation Act of 1973 also allows for the use of miniature horses as service animals, although these are rarely encountered. For additional information, please consult the Department of Justice resources linked at the end of this document.



- Require the service animal to be harnessed, leashed, or tethered unless these devices interfere with the service animal's work or the person's disability prevents use of these devices. In that case, the person must use voice, signal, or other effective means to maintain control of the animal. For example, a veteran with Post Traumatic Stress Disorder who has great difficulty entering unfamiliar spaces may have a dog that is trained to enter a space, check for threats, and return to signal that it is safe to enter.
- Although it is the handler's responsibility for care and supervision of the service animal, it is also helpful to inform the person of the location of relief areas for service animals.

## DO NOT

- Ask the person to remove his or her service animal from the facility unless: (1) the dog is out of control and the handler does not take effective action to control it or (2) the dog is not housebroken.<sup>2</sup>
- Decline to accommodate use of a service animal due to employee fear or allergies.
- Decline to accommodate use of more than one service animal to perform different tasks.
- Exclude service animals based on assumptions or stereotypes about the animal's breed or how the animal might behave.
- Request "service capacity" certification for the dog, require the dog demonstrate its task, or inquire about the nature of the person's disability.
- Pet, speak to, seek eye contact with, or otherwise attempt to gain the attention of the service animal, as this could distract the animal from performing its duties.

## ADDITIONAL TOOLS AND RESOURCES

- DHS [Directive 065-01](#) *Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-employment)*
- DHS [Instruction 065-01-001](#) *Nondiscrimination for Individuals With Disabilities In DHS-Conducted Programs And Activities (Non-Employment)*
- U.S. Department of Justice, [Americans with Disabilities Act \(ADA\) Revised Requirements: Service Animals](#) and [Frequently Asked Questions about Service Animals and the ADA](#).
- DHS Office of Partnership and Engagement, Plan for Improving Access to OPE Public-Facing Programs and Activities for Individuals with Disabilities
- DHS Office of Partnership and Engagement, Guidance for Conducting Accessible Meetings

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<sup>2</sup> Where there is a reason to ask that a service animal be removed, offer the person with the disability the opportunity to obtain services without the service animal present.

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# Office of Partnership and Engagement Providing Disability Accommodations for the Public

## BACKGROUND

Section 504 of the Rehabilitation Act of 1973 (Section 504) requires federal agencies to provide persons with disabilities with an equal opportunity to participate in, and have access to, program benefits and services conducted by the Federal Government. The Office of Partnership and Engagement (OPE) must take necessary action to ensure that members of the public with disabilities have an equal opportunity to participate effectively in programs, activities, and services, including those involving law enforcement interactions (e.g., consensual questioning, inspection, processing, etc.).

A person with a physical or mental impairment that substantially limits one or more major life activities<sup>1</sup> has a disability under Section 504 and may request reasonable accommodation. A reasonable accommodation is any change made to a policy, practice, procedure, or service to allow a person with a disability equal access to OPE-conducted programs and activities that would not impose undue burdens (i.e., financial or administrative). When an action would be an undue financial burden is determined by considering all of the resources available to OPE in the operation of the program. Persons are not required to use the phrase "reasonable accommodation" in order to initiate an accommodation request. Additionally, requests for reasonable accommodation can be submitted by someone on behalf of the person with a disability; and OPE has an affirmative obligation to offer accommodation when there is a known or obvious disability or when a person may be unable to request accommodation.

Medical documentation should not be requested from the person requesting the reasonable accommodation to access a OPE-conducted program or activity. OPE should engage the person in an individualized interactive process to identify the barrier to his or her ability to participate in the program or activity, and the nature of an effective accommodation that would remove the barrier. An individualized assessment is important because persons who have what appear to be similar disabilities do not all have the same needs or require the same accommodations and modifications. Reasonable accommodations must be made in accordance with security and safety needs and all applicable laws and regulations. If unable to provide the requested accommodation, efforts should be made to identify an alternative effective accommodation. Supervisors should be consulted as needed.

## DEAF OR HARD OF HEARING

People who are Deaf are sometimes able to speak and speech read (lip-reading) and often use sign language. Hard of hearing (*HoH*) refers to a person who has a partial loss of hearing within a range from slight to severe. Possible accommodations may include:

- Exchanging written notes;
- Provision of sign language interpreters in-person and through remote video; and
- Provision of text telephones, such as through the Federal Relay service; and with persons who can vocalize, listen attentively

## SPEECH

Persons with speech disabilities span a range from complete inability to speak to speaking with a stutter. Possible accommodations may include:

- Exercise patience rather than attempting to finish sentences for a person with a speech disability;
- Never pretend to understand if you are having difficulty doing so; and
- When possible, ask short questions that require short answers or a nod or a shake of the head.

<sup>1</sup>Major life activities include such things as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working. To be substantially limited means that such activities are restricted in the manner, condition, or duration in which they are performed in comparison with most people.

## BLIND OR LOW VISION

Many blind persons have some light perception or partial vision. Some persons who are blind read and write using Braille as their primary form of written language. People who have low vision have a range of visual ability, with some persons being able to read large print material. Many will use assistive technology, such as screen readers and screen magnification software to interact with computers and other electronic devices. Possible accommodations may include:

- Use of screen reader software and optical readers;
- Use of magnification software;
- Use of electronic, large print, and Braille materials; and
- Reading information to persons.

## MOBILITY DISABILITY

A person with an apparent mobility disability may use a wheelchair or walk with crutches. While not all mobility disabilities are apparent, they may still affect a person's ability to stand, walk or use their hands. Possible accommodations may include:

- Allow persons to sit while being processed or while waiting their turn;
- Use adjustable or moveable presentation screens and displays, where possible to accommodate differing heights and/or an inability to stand;
- Ask to provide assistance or allow caregivers to provide assistance;
- Collaborate with site host at facilities or meeting venues to provide wheelchairs and mobility assistance; and
- Relocate processes to accessible buildings.

## NON APPARENT DISABILITIES

Non-apparent or invisible disabilities can be defined as a physical, mental or neurological condition that limits a person's movements, senses, or activities but are not apparent to others. Examples of such conditions include arthritis, asthma, diabetes, brain injury, epilepsy, mental illness, autism, or developmental disabilities.

Symptoms may include debilitating pain, fatigue, dizziness, cognitive dysfunctions, brain injuries, learning differences and mental health disorders, as well as hearing and vision impairments. It should be noted that inaction or slow responses might not be intentional non-compliance. What may seem like unusual behavior could be the result of someone's lack of understanding or miscommunication, or fear and apprehension when interacting with law enforcement personnel. Allow extra time for the person to process what you are saying and to respond and do not assume ability to perform simple tasks.

## ADDITIONAL TOOLS AND RESOURCES

- DHS [Directive 065-01](#) *Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-employment)*
- DHS [Instruction 065-01-001](#) *Nondiscrimination for Individuals With Disabilities In DHS-Conducted Programs And Activities (Non-Employment)*
- DHS: [A Guide to Interacting with People who have Disabilities](#)
- DHS Office of Partnership and Engagement, Plan for Improving Access to OPE Public-Facing Programs and Activities for Individuals with Disabilities
- DHS Office of Partnership and Engagement, Guidance for Conducting Accessible Meetings

## FOR MORE INFORMATION

The Department of Homeland Security is committed to providing accessible Information and Communication Technology (ICT) to individuals with disabilities, including members of the public and federal employees, by meeting or exceeding the requirements of Section 508 of the Rehabilitation Act of 1973. If you have feedback, questions, or concerns relating to the accessibility of any content that interferes with your ability to access the information contained within this document or on the Department of Homeland Security's website, please contact [Website Issues](#) for assistance. If you have comments and/or questions related to the agency's Section 508 program, please contact the [Office of Accessible Systems & Technology](#) (cc the OPE DAC and the above POC)

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