



# EFFECTIVE COMMUNICATION POLICY

December 6, 2018

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## A. GENERAL POLICY

The Housing Authority of Prince George's County (HAPGC) administers its public and assisted housing programs in a non-discriminatory manner. The Housing Authority's employees, agents, contractors and private management companies shall furnish appropriate auxiliary aids and services to afford individuals with disabilities an equal opportunity to participate in and enjoy the benefits HAPGC's programs and services upon request or is self-evident. The provision of auxiliary aids and services shall be provided at no charge to the individual. HAPGC strives to provide aids and services in a manner that protects the privacy and independence of the individual with a disability. All notifications, including approvals or denials of requests for effective communication referenced in this Policy, will be provided in an alternate format, upon request.

## B. AUXILIARY AIDS AND SERVICES

Auxiliary aids and services enable persons with disabilities to have an equal opportunity to participate in and enjoy the benefits of programs or activities conducted by the Housing Authority. For example, auxiliary aids useful for persons who are Deaf or hard of hearing may include handset amplifiers; video remote interpreting, real time computer aided transcription services, telephone compatible with hearing aids; telecommunications devices for deaf persons (TDD's); qualified sign language interpreters; note takers; written material and other similar services and devices. Auxiliary aids and services for persons who are blind or have low vision may include qualified readers; taped texts; audio recordings; Brailled materials; screen reader accessible materials; magnification software; large print materials; or accessible electronic information.

## C. PROVISION OF AUXILARY AIDS AND SERVICES

1. When an auxiliary aid or service is required to ensure effective communication, the Housing Authority of Prince George's County will provide an opportunity for an individual with a disability to request the auxiliary aid or service of his or her choice. The Housing Authority will give primary consideration to the choice expressed by the individual. "Primary consideration" means that the Housing Authority of Prince George's County will honor the choice unless it can show that another equally effective means of communication is available, or that use of the

means chosen would result in a fundamental alteration in the nature of its service, program, or activity or an undue financial and administrative burden.

2. All requests for auxiliary aids and services must be made and received by the Housing Authority's Section 504/ADA Coordinator within a reasonable amount of time prior to the date the service is needed. If in emergency circumstances an auxiliary aid or service is needed less than ten (10) business days prior to the date the service is needed, the Housing Authority will take reasonable steps to secure the auxiliary aid or service. The individual with a disability, or a HAPGC employee on behalf of the individual, will submit a request for auxiliary aids or services to the Housing Authority of Prince George's County's 504 Coordinator by delivering it to the address or Email listed below. All requests shall be dated and time-stamped upon receipt.

504 Coordinator

The Housing Authority of Prince George's County

9200 Basil Court, Rm 500, (301)883-5576

(Telecommunications Relay Service by Calling 7-1-1)

Email: [DHCD-504@co.pg.md.us](mailto:DHCD-504@co.pg.md.us)

3. Upon receipt of the request, the 504 Coordinator or designee will grant the requested aid or service or will consult with the individual with a disability to further assess and determine the appropriate auxiliary aid or service to be provided. Consideration shall be given to relevant facts and circumstances including the individual's communication skills and the nature and complexity of the communications at issue and giving primary consideration to the communication preferences of the individual with the disability. Within seven (7) business days of the receipt of the request, and as soon as circumstances warrant, the 504 Coordinator will provide the requesting individual with a written notification of the proposed auxiliary aid or service to be provided. The notification shall inform the individual of the right to a grievance hearing and hearing procedures.
4. Provision of needed auxiliary aids and services shall be provided within three (3) business days of the determination, or at the scheduled time of the event for which the aid or service is needed. However, if an extension of time in provision of the aid or service is reasonably requested by either the individual requiring the service or HAPGC, and such extension is agreed to by both HAPGC and the individual, the provision of the service or aid may be reasonably delayed provided that the delay does not significantly affect the individual's rights or benefits and further provided that the extension is documented and included in

the individual's file and in the report and tracking process set forth in Paragraph D.2

#### D. TRACKING AND RECORD KEEPING

1. The 504 Coordinator will maintain copies of all requests for effective communication and Housing Authority's response, for a period of three (3) years.
2. The 504 Coordination shall maintain a reporting and tracking system which will include the request made by an individual and the date the request was made; the date a response was provided to the individual from HAPGC; the response and rationale for the response; the date the auxiliary aid or service was provided, any extension made in the provision of the aid or service; and the identification of the individual requesting or receiving the auxiliary aid or service. The reporting and tracking shall be kept in an electronic format.
3. Copies of information required in Paragraph D.2.above shall also be kept in the individual files of Resident, Participant, and Applicant Families.
4. HAPGC will keep confidential all information and records containing personal identifying information related to an individual's disability and will only release such information in accordance with law.

#### E. PROCEDURES

##### 1. Notice

a).HAPGC will maintain postings that inform Applicants and Resident and Participant Families to contact the 504 Coordinator if auxiliary aids or services are needed for effective communications. This notice will advise that various auxiliary aids and services are available free of charge as needed and will provide example of such services to include interpreters These notices will contain the American Sign Language pictogram for sign language interpreter. Such notices shall be posted prominently in the Housing Authority's Central Office as well as all property management offices. In addition, HAPGC's website, application and recertification materials shall state that, "You can ask for a reasonable accommodation to use HAPGC housing or services. This can include auxiliary aids or services, materials in an alternative format, or help in completing paperwork or changes to your housing based on your disability. Contact 301-883-5094 for assistance."

b) All Housing Authority letterhead will contain the TDD/TTY telephone numbers.

c) When it is self-evident that an individual is Deaf or hard of hearing and cannot communicate without auxiliary aids or services, HAPGC must engage that

individual to determine what aids or services are required to effectively communicate.

## 2. Current Residents' Requests for Auxiliary Aids or Services

a) Requests for auxiliary aids or services should be made directly to the Housing Authority of Prince George's County Property Manager, who will forward the request(s) to the 504 Coordinator within one (1) business day of receipt. Requests should be made as soon as practical to give HAPGC sufficient time to respond. Current residents should generally provide at least three business days advance notice of a request for an interpreter.

b) When HAPGC has determined that a resident needs a specific auxiliary aid or service for effective communications, such services shall be noted in the resident's file to be needed for specific types of communications and residents shall not be required to be re-assessed each time they need the specific aid or service. For example, when a resident needs a rental notice in large print or in an electronic format, the resident need not make repeated requests for such service. When a resident needs an interpreter for a meeting with an officer manager, the resident should be automatically scheduled for an interpreter for such meetings.

## 3. Public Events

Individuals with disabilities who request auxiliary aids or services for public events such as public hearings, Board meetings, public meetings, etc., must make their requests one week prior to the event whenever possible. HAPGC shall make good faith efforts to respond to requests made less than one week prior to a public event, however it may not be able to secure such services. The 504 Coordinator will document the efforts made to accommodate the request, including any attempts to schedule an interpreter.

## 4. Continuing Duty to Communicate

a) Between the time that HAPGC i) recognizes that an auxiliary aid is needed, or ii) receives a request for auxiliary aids or services; and the time that HAPGC provides any needed aid or service, HAPGC may continue to try to communicate with the individual with a disability. However, HAPGC shall not require an individual to bring another person to interpret and may only rely on a person accompanying an individual who is Deaf or hard or hearing to interpret or facilitate conversation in an emergency and where there is not interpreter available.

- b) HAPGC will continue to assess the communication effectiveness of any auxiliary aids or services provided and will alter services as needed to ensure effective communications.

## F. GRIEVANCE PROCEDURES

- 1. Any adverse decision regarding a request for auxiliary aids or services or other methods of effective communication under this policy request is subject to HAPGC's grievance policy in its Administrative and ACOP plans.