Management Memo

SUBJECT: ALTERNATIVE FORMATS NUMBER: MM 03-08

REFERENCES: GOVERNMENT CODE

SECTION 11135 AMERICANS WITH

DISABILITIES ACT (ADA)

ISSUING AGENCY: Department of **EXPIRES:** UNTIL RESCINDED

Rehabilitation

Background

The Legislature recently amended California Government Code Section 11135. Effective January 1, 2002, this section incorporates the provisions of Title II of the Americans with Disabilities Act. Title II provides that all public entities must ensure that their programs, activities and services are accessible to persons with disabilities. One of the most important components of accessibility is ensuring that any communication with persons with disabilities is as effective as communications with others.

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Many people with disabilities, particularly people who have sensory disabilities, (visual and hearing) require alternative formats beyond conventional print so they can have access to information. Examples of alternative formats include large print, audiocassettes, Braille, and e-Text.

While most departments have responded to individual requests for materials in alternative formats, a formal written policy provides greater assurance of compliance by informing staff in advance how to respond to requests for accommodation. To comply with Government Code Section 11135 and Title II of the ADA, the DGS and the ADA Task Force encourage all departments to develop a comprehensive policy regarding the provision of materials in alternative formats.

Developing Your Policy

Developing a clear policy where alternative formats are readily available, creating a process for securing formats when not readily available, and establishing a time frame within which to deliver materials in alternative formats, can accomplish several objectives:

Objectives

Reduce staff confusion about the correct course of action and, as a result, lower costs and improve response time.

- Make sure the general public is aware of the alternative formats available for your material.
- Ensure you budget adequate funds for procuring materials in alternative formats.

Document Planning

- Planning for documents in alternative formats should become a routine part of your publication process. To ensure that you respond to requests in a timely manner and provide accurate translations, please keep the following in mind:
- When initially developing documents, your foremost goal should be to communicate the information to requestors effectively. Use language that is clear and concise and that people can easily understand with little previous experience or background. This will facilitate translation to alternative formats. Be discerning when adding tables, charts and graphics remembering that these are for persons using alternative formats.
- Decide, based on staff resources, which alternative formats to produce in-house and which to outsource.
 Contract with more than one vendor offering services such as Brailling or video captioning. Depending on the size of the Braille document and the vendor's workload, the time frame for delivery of a Braille document ranges from a few days to several months.

- Establish who in your organization will handle requests for documents in alternative formats. When developing policy, be sure that you involve representatives of your publications, graphic arts, information technology and business services sections. Ensure that everybody involved in the production of materials understands who will produce each document.
- Determine early which publications are liable to be requested in alternative formats and ensure that copies of those documents are readily available in several formats. It is helpful to keep a log of requests received, as this information may be useful in determining future budget and publication needs.
- Agree on a reasonable time frame to deliver documents not readily available and be sure that staff communicates this to individuals making requests. Include a statement on the availability of the document in alternative formats on all of your publications. Be sure to include the address, telephone number and TIY number where you receive requests.

Suggested Wording

- Meeting Notices, Agendas, Training Notices, etc:
 In accordance with the California Government Code and ADA requirements; if you need a disability-related reasonable accommodation/alternative format for this meeting, please contact (name) at (phone, E-mail address, and TDD number) by (a date up to two weeks prior to the event).
- Brochures and Program Outreach Material:
 - ALTERNATIVE FORMATS: In accordance with the California Government Code and ADA requirements, this publication can be made available in Braille, large print, computer disk, or tape cassette as a disability-related reasonable accommodation for an individual with a disability.
 - To discuss how to receive a copy of this publication in an alternative format, please contact (name,

E-mail address, phone and TDD number).

- Ensure that staff understand they may not place a surcharge on publications produced in alternative format. If a document is available to the public free of charge, the document in an alternative format must also be free of charge. For those documents that are available for a fee, the fee must be the same for the document in an alternative format.
- A public entity must provide an opportunity for individuals with disabilities to request the alternative format of their choice. This expressed choice should be given primary consideration. Often, however, only a portion of lengthy documents is necessary in alternative format. Encourage staff to engage in an interactive, courteous dialogue with the individual making the request.

Implementing a Variety of Formats

Departments need to consider a range of formats for both the production and distribution of information. Effective communication reflects a "mixed media" approach, possibly involving video representation, verbal descriptions, audio associated sounds, and interactive databases in addition to the printed word. The most commonly requested alternative formats include:

 Large Print: a publication using 14-point type or larger. Staff can produce documents in larger than standard print: Most word processing and other software programs offer a choice of font sizes, or copy machines can enlarge documents. With the exception of the need for additional paper, using large print seldom reflects perceptible additional costs. Pages on the World Wide Web must also consider large print options. The use of Cascading Style Sheets allows each user to set the format of pages to his or her own preference.

- Audio Tape: a publication recorded on tape. The development of audio recordings creates a highly flexible format which many people with disabilities can easily use. Having someone with a clear speaking voice who is very familiar with the material is all you need to create a high-quality audiotape. Project staff often meet these requirements although the time required may take them away from other duties. The cost of equipment and supplies related to audio taping has dropped greatly in the past several years.
- Video Tape: a publication recorded on video tape, a relatively wide magnetic tape for use in recording visual images and associated sound. Informational or training video tapes should be closed caption encoded, and video projection equipment should have the capability of displaying closed captioning. Closed captions are a text version of the spoken part of a television, movie, or computer presentation that make it accessible to persons who are deaf or hearing impaired
- Braille: a reading system for persons who are blind using raised dots to read through touch. To produce material in Braille format, you usually contract for the service outside your organization. Costs for this service vary, however, and vendors usually charge for the original production of a page as well as for each reproduced page. If you have a generous time frame for development, you may be able to locate a source for your Brailling that is free or at a reduced cost.
- Diskette: a method of saving information from a computer onto a disk in a format usable with assistive technology such as screen readers. Costs of producing information on diskettes are low compared to many other formats. You can purchase diskettes for less than \$1 each. Additional resources are not necessary and preparing materials in this format does not use more staff time. CD ROMS can hold much more information and are continuing to replace diskettes.

- Internet/World Wide Web: is a computer-based "network of networks" that allows information to be shared electronically. The medium offers access to anyone with a computer and a modem; however, people with disabilities need special consideration to ensure that web-based materials are accessible. It is recommended that Webmasters provide HTML, Word, or other alternate versions of all documents posted in PDF format.
- E-Mail Attachments: E-Mail messages with attachments should provide the attachments in different, alternate formats; i.e., PDF and Word, especially if the E-Mail is sent to a large number of addressees.
- General Correspondence Font, Size: It is recommended that a font without serifs be used (Arial, Tahoma, Univers) at a size no smaller than 12 points for all general correspondence

Budget for Alternative Format Conversion

If you plan in advance, for the most part, providing materials in alternative formats does not have to be expensive, time-consuming or complicated. A well-developed plan will help you identify funds needed for production of alternate formats for incorporation in your budget planning. In the meantime, departments need to be prepared to identify resources to cover the costs of providing requested alternate format materials from existing resources.

More Information

For further information on alternative formats or for a list of resources for the provision of materials, please contact the Department of Rehabilitation's Disability Access Section at adatf@dor.ca.gov

Signature

Original Management Memo signed by J. Clark Kelso, Interim Director Department of General Services