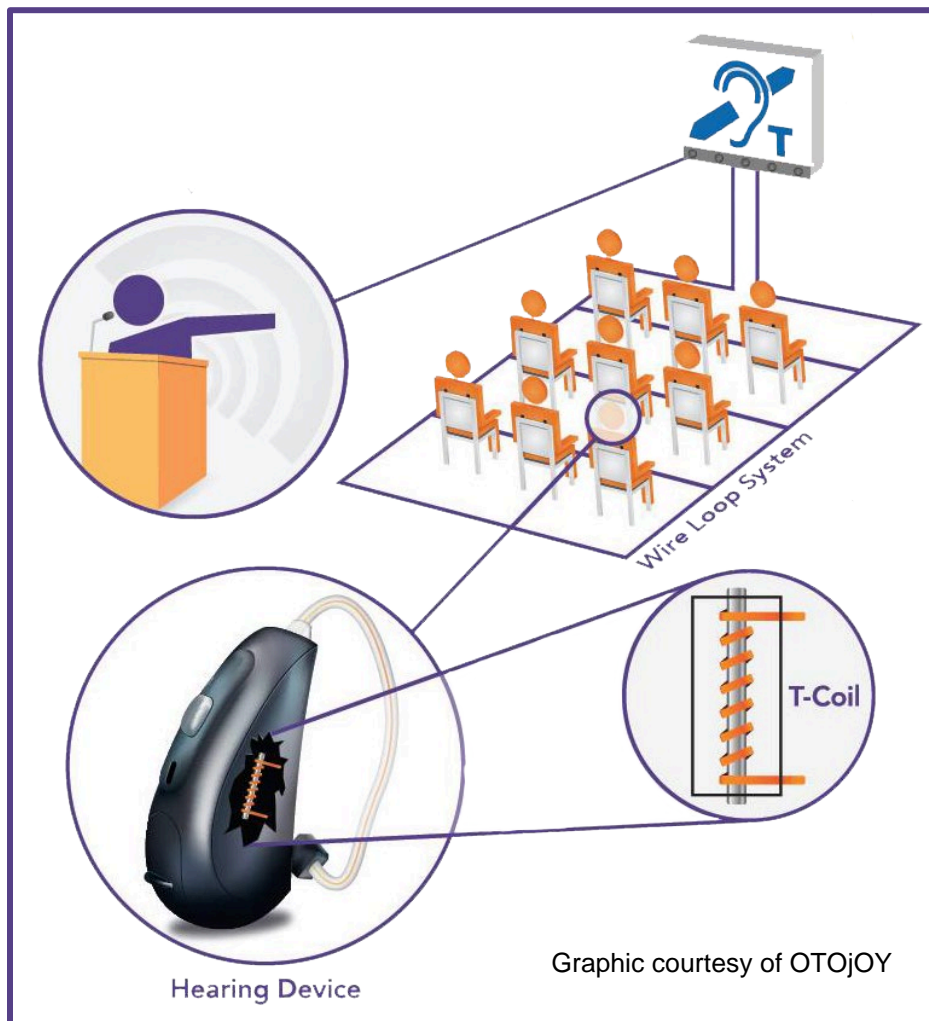


# Get in the Hearing Loop Toolkit Handbook



**Advocate for Hearing Loops!**

Hearing Loss Association of America

**PART 2**

## Get in the Hearing Loop Toolkit Handbook

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6116 Executive Blvd., Suite 320  
Rockville, MD 20852  
hearingloss.org

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### About the Authors

Ann Thomas has hearing loss and wears two cochlear implants. She is an award-winning advocate and consultant for people with hearing loss, a member of the Hearing Loss Association of America (HLAA), a member of the HLAA Get in the Hearing Loop Program Committee, HLAA Brand Ambassador, President of the Hearing Loss Association of America-Diablo Valley Chapter, and a Hearing Assistive Technology Specialist.

Cheri Perazzoli has lived with progressive hearing loss since childhood and wears bilateral hearing aids. She is a committed advocate for people with hearing loss, serving on the Board of Directors for the Hearing Loss Association of America (HLAA), HLAA Get in the Hearing Loop Program Committee Chair, President of the HLAA Washington State Association, and Founder of Let's Loop Washington.

### Updates to the Handbook

The information contained in this Handbook is for informational purposes only. Significant effort has been made to present information that is comprehensive and accurate. Changes can occur during the lifetime of an edition.

Please send any suggestions to: [GITHInfo@hearingloss.org](mailto:GITHInfo@hearingloss.org)



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## How to use the GITHL Toolkit Handbook

You have heard the GITHL message loud and clear and have decided to advocate for hearing loops. How do you start?

You would not start an epic journey without a map and a plan. The same logic applies to getting hearing loops installed in your community. Because it is usually not as simple as asking a venue to install a hearing loop, the GITHL Toolkit Handbook is your roadmap to success. Think of all the different elements as GPS, signposts, and rest stops.

We suggest spending time getting familiar with the content in the Handbook. You will find everything from GITHL logos, brochures, posters and presentation materials to sample letters and postcards. There is information about how hearing loops work and laws that will back up your requests for hearing accommodations. Most importantly, there are answers to your questions and inspiration to keep going toward your goal.

Whether your goal is one hearing loop or as many as you can get installed throughout your community, spend some time with our companion document.

*“How to Successfully Advocate for Hearing Loops — A Step-by-Step Guide.”*

This user-friendly, standalone document walks you through the entire process, helping you to think strategically, prepare for presentations, answer questions, and support venues in successfully installing and promoting their new hearing loop. There is even a section on evaluating lessons learned and celebrating success.

For a quick advocacy overview, look at the Advocacy Cheat Sheet in the Step-by Step Guide.

### Viewing, Downloading and Printing GITHL Toolkit Documents

The tools in the Get in The Hearing Loop Toolkit can be viewed in this Handbook and are available on the Hearing Loss Association of America website at [GITHL Toolkit](#). You are welcome to download toolkit files to help with your advocacy. For your convenience, we have also included links to the individual documents throughout the Handbook.

All the downloadable digital files can be printed from your home computer or at local print shops like COSTCO, Office Depot, Staples and FedEx/Kinkos. Note: for the GITHL poster and educational poster, we recommend that you not do not select “enhance color” if printing from COSTCO.

Direction on ordering The Hearing Loss Facts and Statistics, Are You Hearing Everything You Could, and A Guide to Understanding Hearing Loops documents can be found at the end of the Handbook.

This GITHL Toolkit Handbook was meant to be used as a reference guide.

Bon voyage and good luck.

# Sample Publicity

## Seattle Repertory Theatre



**GRAND UNVEILING**

PLEASE JOIN US FOR A CELEBRATION  
AND LAUNCH OF THE NEW LOOPING SYSTEM

associated with a preview performance of  
*Sherlock Holmes and The American Problem*

**Sunday, April 24, 2016**  
at Seattle Repertory Theatre  
155 Mercer Street | Seattle, WA 98109

6:00 p.m. Private VIP Wine Reception – Benjamin Moore Spirits Lounge  
7:00 p.m. Hearing Loop Presentation – Bagley Wright Theatre  
7:30 p.m. Preview Performance – Bagley Wright Theatre



**(( RSVP BY TUESDAY, APRIL 19, 2016 ))**  
to Heidi Pardo at (206)443-2203 or heidip@seattlerep.org

 SEATTLE  
REPERTORY  
THEATRE [seattlerep.org](http://seattlerep.org)  

PHOTO: ABOVE: Esmayr Bennett, Connor Tom, and Ben Harris in *The Hound of the Baskervilles*; photo by Chris Bennett.


**((( SEATTLE REP IS BRINGING PATRONS "INTO THE LOOP!" )))**

Seattle Repertory Theatre is proud to announce an innovative new assistive listening system for our patrons with hearing loss: the hearing loop system, a wireless technology that transmits speech or music on stage directly to theatergoers' cochlear implants and hearing aids with Tcoils. Patrons will hear sound picked up by the theatre's PA system rather than from the microphone in an implant or hearing aid, resulting in a clearer sound with less background noise.



With the installation of this new system, **Seattle Rep is now the largest institution in the city with full hearing accessibility.**

**ABOUT THE SHOW**



***Sherlock Holmes and The American Problem***  
by R. Hamilton Wright  
directed by Allison Narver  
**April 22—May 22, 2016**

**World premiere.** The American Wild West and Victorian England collide in this original adventure tale. The year is 1887, the occasion is Queen Victoria's Jubilee, and the coincidences are suspiciously piling up. The creative team behind 2013's hit *The Hound of the Baskervilles* is at it again with more thrills, more laughs and more unbelievable deductions.

## Hearing Loop Instructions, Seattle Repertory Theatre



# Hearing Loop Instructions

## What is a hearing loop?

An assistive listening system that provides a clearer sound right to your personal hearing device. The hearing loop uses a wireless signal to transmit the sound from the theater's PA system to the T-coil in your cochlear implant or hearing aid.

## Where will it work?

Coverage is provided wherever you see the T-coil symbol.



Locations include the Bagley Wright Theater, Leo K. Theater, Patron Services Office, concierge desk, and lobby concessions stand and bars.

## How do I use it?

- **If your personal hearing device is equipped with a T-coil,** simply set your device to the 'T' setting. Depending on the device, this can be done by pushing a button, toggling a switch, or using a remote control. This setting turns off your microphone.
- **If your hearing device does not have a T-coil,** you can acquire headphones and a loop receiver that will work with the hearing loop system. Loop receivers are available at Coat Check.

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## Tell us how it's working!

Please stop by the concierge desk and let us know, or email us at [feedback@seattlerep.org](mailto:feedback@seattlerep.org).

## Town Hall, Seattle, WA

**Please fill out a Comment Card below and tell us about your Hearing Loop Experience!**

The **International Symbol** is displayed at venues with a **Hearing Loop** prompting participants with hearing aids or cochlear implants to turn on their T-coils.

If participants with hearing loss don't have T-coil equipped hearing aids or cochlear implants, the International Symbol alerts them to request a headphone.

**THANK YOU**

**COMMENTS**

**PLEASE TELL US ABOUT YOUR HEARING LOOP EXPERIENCE**

- Date \_\_\_\_\_ Location: Grand Hall \_\_\_\_\_ Downstairs \_\_\_\_\_
- Where did you sit? (✓ two) Front \_\_\_\_\_ Middle \_\_\_\_\_ Rear \_\_\_\_\_  
Left Side \_\_\_\_\_ Center \_\_\_\_\_ Right Side \_\_\_\_\_
- Did you use your own hearing device or a receiver from Town Hall?  
(✓one) Own hearing device w/Telecoil: \_\_\_\_\_ Receiver \_\_\_\_\_
- Did the Hearing Loop benefit your experience? Yes \_\_\_\_\_ No \_\_\_\_\_
- Was the sound clear and without distortion? Yes \_\_\_\_\_ No \_\_\_\_\_  
If No, what problems did you experience? \_\_\_\_\_
- Would you be more inclined to attend events at venues with Hearing Loop technology? Yes \_\_\_\_\_ No \_\_\_\_\_
- Would you like to learn more about Hearing Loop technology?

Your Email: \_\_\_\_\_

**THANK YOU**

[www.hearingloss-wa.org](http://www.hearingloss-wa.org) [www.loopsSeattle.org](http://www.loopsSeattle.org)

Library, Princeton, NJ



# Getting Looped In

## A DEMONSTRATION OF THE LIBRARY'S NEW HEARING LOOP ASSISTIVE TECHNOLOGY



Thursday  
Sept. 26  
4 p.m.  
*Newsroom*  
*Second Floor*

65 Witherspoon St.  
Princeton, NJ, 08542

**RSVP by Friday, Sept. 20**  
Stephanie Oster  
609-924-9529, ext.1280  
soster@princetonlibrary.org

Princeton Public Library is pleased to introduce an exciting new technology to our community. We recently installed **hearing loops** that work with telecoils in hearing aids and cochlear implants to improve clarity for hearing impaired patrons at library events.

If you, or someone you know, need a hearing boost to help bridge the comprehension gap at our public events, please join us for a special demonstration of the **hearing loop**.

An expert from Audio Directions, designer of our hearing loop system, will be on hand to demonstrate how it works. Telecoil listeners will be available for those without hearing aids.

*The hearing loops in the library Community Room, Newsroom, Technology Center and Conference Room were **made possible by a gift from Adelaide Zabriskie.***



## Place of Worship

Having trouble hearing?

# Place of Worship

Has a hearing loop for  
people with hearing loss



### Why hearing loops?

While hearing aids have improved in the last decade, they do not restore hearing to normal especially in large venues and places of worship. Hearing loops help overcome this problem by broadcasting clear sound without background noise to hearing aids.

### How does a hearing loop work?

A hearing loop connects to the PA system and transmits sound wirelessly to hearing aids equipped with telecoils (T-coils). Users report they hear the spoken word much easier and without background noise.

### How do I use it?

Ask your hearing health care provider if your hearing instruments have a telecoil or T-coil and to them turned on. Once activated, the telecoil program can be accessed by pushing a button on the hearing device. Talk to your hearing aid provider to find out if your instruments can have both a T, no background noise pick-up and an M+T program, blended microphone & T-coil program, to hear well at the [name of place of worship](#)

### No hearing aids or no t-coil.

Ask for a hearing loop receiver and headphones or use your own [LoopBuds](#), t-coil earbuds, connected to your smartphone and a free app.

For questions about hearing aids and telecoils talk to your provider or contact:  
Juliëtte Sterkens, AuD., Hearing Loop Advocate  
[jsterkens@hearingloss.org](mailto:jsterkens@hearingloss.org)

To learn more about hearing loops visit:

**[hearingloss.org](http://hearingloss.org)**

## Noteworthy Public Facilities with a Hearing Loop

**The United States Supreme Court**

**US House of Representatives**

**US Senate Chambers**

**VP of US Residence**

### City Council Chambers with Hearing Loop

**Alaska**

Fairhope

**Arizona**

Tempe

California

Cerritos

Concord

Culver

Garden Grove

Goleta

Grass Valley

Livermore

Long Beach

Napa

Novato

Pleasant Hill

San Diego

San Leandro

Santa Monica

Sausalito

Woodside

**Colorado**

Fort Collins

Colorado Springs

**Florida**

Apopka

Anna Maria

Bradenton

Gainesville

Haines

Lakeland

Lakewood Ranch

North Port

Sarasota

Village of North Palm Beach

West Palm Beach

**Georgia**

Watkinsville

**Illinois**

Lake Forest City Hall

Northfield

Palatine

Riverwoods

Schaumburg

Shorewood

**Iowa**

Sioux City

**Massachusetts**

Boston

**Michigan**

Grand Haven

Grand Rapids

Holland

Rockford

Westland

**Minnesota**

Brooklyn Park

Hopkins

Minneapolis

New Hope

St Louis Park

Saint Paul

Waite Park

**Oklahoma**

Nichols Hills

**Oregon**

Cottage Grove

Eugene City Hall

Springfield

**New York**

Huntington

Manhasset

North Hempstead

New York

**New Mexico**

Albuquerque

Los Alamos

Santa Fe

**North Carolina**

Asheville

Wilmington

**Texas**

Georgetown

**Washington State**

Anacortes

Bellevue

Blaine

Burlington

Deer Park

Elma

Montesano

Seattle

Spokane

**Rhode Island**

Providence

**Wisconsin**

Horton

Howard Grove

Kaukauna

Kenosha

Madison

Manitowoc

Muskego

Neenah/Menasha

Oshkosh

## Hearing Loop Manufacturers

AudioDirections

<https://ad4h.com>

Ampetronic

<https://www.ampetronic.co>

Contacta, UK

<https://www.contacta.co.uk>

Oval Window Audio

<http://www.ovalwindowaudio.com>

Bo Edin, Univox

<https://www.univoxaudio.co.uk>

## GITHL Historical Timeline and Milestones

Our hearing loop advocacy efforts were curtailed in 2020 due to the global COVID -19 pandemic.

- 1980** HLAA and chapters begin using hearing loops at meetings
- 1999** David Myers visits Scotland, Iona Abbey, and experiences a hearing loop for the first time
- 2001** Dave Myers starts Let's Loop America
- 2008** Gerald Ford International Airport, Grand Rapids, MI. The 1st US airport to install hearing loop technology
- 2009** 1st International Hearing Loop Conference, Winterthur (Zurich), Switzerland  
NY Taxis and Limousine Commission approved voluntary hearing loops in all vehicles, Hearing Access Program
- 2010** Hearing Loss Association of America (HLAA) and the American Academy of Audiology (AAA) partner to initiate a public education campaign, Get in the Hearing Loop (GITHL)  
GITHL campaign was introduced at the AAA Convention, San Diego, CA  
Breslin Center, Michigan State University first large arena (12,000 seats), installs a hearing loop.
- 2011** 2nd International Hearing Loop Conference, Crystal City, Virginia  
HLAA introduces the joint HLAA and AAA GITHL campaign to consumers  
488 NYC Transit subway station booths, install hearing loops, Hearing Access Program
- 2012** David Myers, America's leading hearing loop advocate, gives Keynote Address at HLAA Convention  
Juliëtte Sterkens appointed HLAA consumer and hearing loop advocate  
NY Taxi and Limousine Commission promotes hearing loops in Taxis of Tomorrow, Hearing Access Program  
International Federation Hard of Hearing People (IFHOH) World Congress, Bergen, Norway, Hearing Loops: They Have a History, and an Even Brighter Future, presenters Brenda Battat, Pat Kricos and Juliëtte Sterkens
- 2013** Anna Hall, ED HLAA assumes GITHL Chair  
GITHL creates a strategic plan for the GITHL Campaign  
3rd International Hearing Loop Conference, Eastbourne, UK
- 2014** Richard Rogers Theatre and Gershwin Theatres, 1st Broadway theaters to install hearing loops  
US Supreme Court installs a hearing loop
- 2015** GITHL Campaign transitions to an HLAA GITHL Program

- GITHL releases new logo
- HLAA launches new Hearing Loop Advocates Toolkit
- 2016** Anne Pope assumes GITHL chair
- 2017** Bay Area Rapid Transit (BART), San Francisco, CA, Bay Area orders 755 new trains with hearing loops
- NYC requires hearing loops or comparable technology in public rooms, at security desks of buildings and renovations receiving \$950.00 or more of city funds.
- 4th International Hearing Loop Conference, Berlin, Germany
- International Hearing Access Committee (IHAC) formed
- GITHL Task Force creates a 3-year Strategic Plan
- 2018** Cheri Perazzoli assumes GITHL chair
- GITHL rebrand new logo
- GITHL Task Force changes names to GITHL Committee, HLAA Convention, Minneapolis, MN
- GITHL Committee expands the Strategic Plan of 2017, HLAA Convention, Minneapolis, MN
- 1st GITHL Manufacturers, Installers and Advocates Meeting, HLAA Convention, Minneapolis, MN
- New York City, City Council Chambers are looped
- 2019** HLAA supports the inclusion of telecoil technology in all hearing aids and cochlear implants, as well as the installation of high quality, well-maintained hearing loop assistive listening systems in public spaces such as ticket counters, auditoriums, houses of worship, classrooms, theaters, concert halls, airports, train stations, and public transportation.
- International Hearing Access Committee extends hearing loop life expediency
- GITHL launches a new GITHL Toolkit, HLAA Convention, Rochester, NY,
- 2nd GITHL Annual Manufacturer, Installers and Advocates Meeting, HLAA Convention, Rochester, NY
- 2020** 300 + Theaters, Concert and Event Centers looped in the US, including Vivian Beaumont Theater, Mitzi E. Newhouse Theater and Landmark Theaters, to name a few
- International Federation of Hard of Hearing People (IFHOH) Congress, Budapest, Hungary, May 27-29
- HLAA GITHL groups.io launched
- US Airports are getting in the hearing loop, Sky Harbor, Phoenix, AZ; Rochester, NY; Atlanta, GA; Sea-Tac, Seattle, WA, to name a few.
- 2022** Google adds hearing loops to Google Maps as Assistive Hearing Loop

## HLAA Get in the Hearing Loop Award Recipients

- 2012** HLAA chapters, Albuquerque, NM; New Your City; Sarasota, FL
- 2013** Fox Cities Performing Arts Center, WI
- 2014** Morgan Stanley, Sarasota, and Nederlander Organization, both individually.
- 2015** Mike Langner, NM
- 2016** Cheri Perazzoli, WA
- 2017** Janice Armigo Brown, CA
- 2018** Joseph & Erlene Little, Washington, and Jerry & Joanna Olmstead, WA
- 2019** Ana Covey, OK
- 2020** John G. Shedd Institute for Performing Arts (Shedd), Eugene, OR
- 2022** HLAA Whatcom County Chapter, Chapter on a Mission, WA

# Sample Hearing Loop Newsletter Article Google Maps

## Hearing Loop Accessibility Now Identified Within Google Maps Listings

The Hearing Loss Association of America Get in the Hearing Loop Committee (HLAA GITHL) announced that, at our request, Google Maps recently added a new accessibility attribute for installed hearing loop systems called “Assistive Hearing Loop.” This is the first new attribute for accessibility since June 2020, when five wheelchair attributes were first published on Google Maps.

The new feature, visible in the “**ABOUT**” section for businesses and organizations, indicates that a hearing loop system is available for public use at that location.

Hearing loops work wirelessly with ALL brands of telecoil-equipped hearing instruments, which include hearing aids, cochlear implants, and bone conduction devices. For those without hearing instruments or t-coil enabled instruments, telecoils are available in hearing loop receivers, streamers, and some personal sound amplifiers.

For the 48 million Americans with hearing loss, this new service is important because it informs people about hearing accessibility via hearing loops before they leave home. Additionally, Google Maps users are welcome to contribute ratings and reviews about their hearing loop experience by location — just as users typically do for wheelchair access.



Hearing loop systems are installed across the USA, Canada, Europe, the Middle East, Asia, and Australia. They can be found in places of worship, hospitals, auditoriums, libraries, assistive living facilities, airports, theaters, classrooms, retail spaces, rail systems, and taxi cabs. Internationally recognized signage features the symbol of access for hearing loss with a “T” for the hearing loop system. It lets people know to activate the “T-coil” in their personally programmed hearing instrument for a wireless connection to improve audio clarity and comprehension. No WiFi or Bluetooth connections are necessary to connect.

In even the most acoustically challenging spaces, the hearing loop experience is often described as life-changing. Cheri Perazzoli, chairperson of HLAA GITHL, explains: “For people living with hearing loss, finding businesses and organizations with hearing loops helps us participate more fully and safely in the activities of daily life. This user-friendly hearing assistance also helps us to feel seen, heard, and included. The value of this practical and emotional support cannot be overstated.”

For more information about HLAA’s Get in the Hearing Loop Program, including a free toolkit, GITHL Toolkit Handbook and How to Successfully Advocate for Hearing Loops, A Step-by-Step Guide, visit [hearingloss.org/GITHL](https://hearingloss.org/GITHL).

If you have additional questions, email [GITHLinfo@hearingloss.org](mailto:GITHLinfo@hearingloss.org)



## Position Papers

### HLAA Position Paper, Telecoils and Hearing Loops

Link to printable version [HERE](#)



hearingloss.org

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#### POSITION PAPER

##### Telecoils and Hearing Loops

**Synopsis:** HLAA supports the inclusion of telecoil technology in all hearing aids and cochlear implants as well as the installation of high quality, well-maintained hearing loop assistive listening systems in public spaces such as ticket counters, auditoriums, houses of worship, classrooms, theaters, concert halls, airports, train stations, and public transportation.

Despite significant advances in hearing aid and cochlear implant technology, people with hearing loss cannot adequately hear in many public spaces when there is too much background noise or the voices are too far away. The most common adjunctive solutions—FM or infrared assistive listening devices (ALDs)—typically require the user to wear a large, stigmatizing, and cumbersome hearing device in addition to or as a replacement for their own devices. As a result, ALDs are underutilized and people with hearing loss cannot participate fully in many areas of public life.

The combination of telecoils and hearing loops offers an easy-to-use, effective and dignified solution for people with hearing loss. Telecoils—simple magnetic coils—can be found in most hearing aids and in nearly all cochlear implants. Hearing loops are a straightforward connectivity technology that enables sound to be “broadcast” wirelessly directly to the telecoil in a hearing device, delivering clear sound directly to the wearer’s hearing aid or cochlear implant that is free of the effects of background noise, distance and reverberation.

Simple loops enable people with hearing loss to hear, for example, a pharmacist provide instructions for a prescription. More sophisticated loops—installed in a meeting room in a municipal building—enable people with hearing loss to participate fully in their government. These are only two of many examples of the exceptional utility of hearing loops and telecoils.

HLAA encourages the development of universal wireless connectivity for assistive listening technologies, solutions that are fully compatible with all hearing devices from all manufacturers. However, at present, and for many years to come, no wireless audio technology (including Bluetooth) is as usable, flexible, or as easy for consumers with hearing loss to use as telecoils and hearing loops. Therefore, HLAA supports the inclusion of telecoil technology in all hearing aids and cochlear implants as well as the installation of well-maintained hearing loop systems in public spaces that meet or exceed IEC 60118-4, the international standard for loop installations.

Adopted February 2018, to be reconsidered February 2022.



## Hearing Loops and Telecoils: When Will They Become Obsolete?

Link to printable version [HERE](#)

### IHAC - International Hearing Access Committee



### Hearing Loops and Telecoils: When will they become obsolete?

The International Hearing Access Committee (IHAC) aims to estimate the time a transition from the existing audio transmission to telecoils via hearing loop (HL) and other assistive listening systems (ALS) to a platform of digital audio streaming direct into hearing aids, will likely take.

Telecoils (TC) are small copper wire coils integrated in most hearing aids (HA), HA accessories and cochlear implants (CI) in use today. The TC is designed to pick up electromagnetic analog signals from telephones and from HL/ALS which are designed to improve communication access for people with hearing loss<sup>1</sup> in venues where distance, reverberation and background noise prevent comprehension.

Telecoils have important advantages for hearing aid and cochlear implant users such as:

- Ease of use by people of all ages.
- Availability in nearly all hearing devices.
- Affordability (no cost to users beyond the price of the hearing aid).
- Energy efficiency (little or no battery drain).
- Universality, any TC can connect to any ALS. No matter their brand of HA or brand of ALS.
- Very low latency, which is important in real-time events.

However, TCs have only 1 channel (no stereo), and are sensitive to electromagnetic interferences.

IHAC recognizes that since 2014 the European Hearing Instrument Manufacturers Association (EHIMA) has taken serious steps to get a hearing aid profile (HAP) as a standard for Bluetooth connectivity.<sup>2</sup> This will ultimately permit direct streaming of high-quality stereo audio signals into HA/CI. EHIMA admits this process is taking longer than expected.

Consumer organizations (International Federation of Hard of Hearing People, the Hearing Loss Association of America and the European Federation of Hard of Hearing) while excited about what the future will bring, are concerned that premature announcements will discourage research in TCs and lead to HL/ALS neglect and abandonment well before such a new technology is fully matured and carefully evaluated by end users.

While an accurate time estimate of a worldwide transition from an analog to a digital audio streaming system cannot currently be made, it is reasonable to believe that TC, HL/ALS usage will continue for the next 10-15 years and beyond.

HA/CI users require continued quality hearing access in public places which is currently, and in the foreseeable future, provided by TC and HL/ALS. The rights of HA/CI users to access must be continued and maintained during this period of technological change and shall not be compromised by the promise and overly optimistic expectations of a future technology development.

#### References:

1: [www.access-board.gov/research/completed-research/large-area-assistive-listening-systems/1-introduction](http://www.access-board.gov/research/completed-research/large-area-assistive-listening-systems/1-introduction)

2: <https://hearinghealthmatters.org/hearingnewswatch/2014/hearing-industry-seeks-new-wireless-standard-hearing-aids-t-coil-advocates-say-fast/>

June 2019

## Clarification Regarding Bluetooth Technology

Link to printable version [HERE](#)



### CLARIFICATION REGARDING BLUETOOTH DEVICES

At the time of writing this guide there is a considerable amount of confusion and ambiguity surrounding Bluetooth technology in the world of assistive listening.

**Bluetooth Classic** is available now and is used for personal use, for example, pairing hearing aids to mobile phones, televisions and cars.

Currently hearing aid manufacturers work from a number of different and largely incompatible platforms. This means that personal accessories such as Bluetooth TV listening solutions from one manufacturer cannot be used with hearing aids from a different manufacturer.

In addition, Bluetooth Classic technology is not suitable for, or used in, public applications that require broadcast audio such as classrooms and courtrooms, conference and meeting rooms, auditoriums and theatres or houses of worship, to name just a few.

There has been some mention of a potentially new technology, **Bluetooth LE**, being developed to support multi-stream audio for a range of hearable products, for example ear buds, headsets, and over the counter hearing aids. This technology is not yet available and before it becomes available hearing aid manufacturers will require common protocols and standardization across all brands.

If common standards and protocols are agreed upon then the introduction of this technology will not happen overnight and will have to be developed in stages. It will also need to meet any relevant technical and accessibility standards including those of:

- audio quality
- audio latency
- access and availability
- impact on the hearing aid
- access for non-hearing aid users • coverage
- security
- signage and instruction
- monitoring and maintenance
- compatibility

Like any new technology, Bluetooth LE or its equivalent, will have to prove that it is fit for purpose and that it can provide a benefit to people who experience hearing loss.

It will take a considerable period of time to transition to new technologies even if they successfully meet the requirements of a fully functional assistive listening solution.

As a group we at IHLMA expect this transition to take several years and feel it is paramount that any new systems are delivered in conjunction with existing technologies to ensure end users are provided with the appropriate access suited to their needs via their preferred channels. This guide will be updated

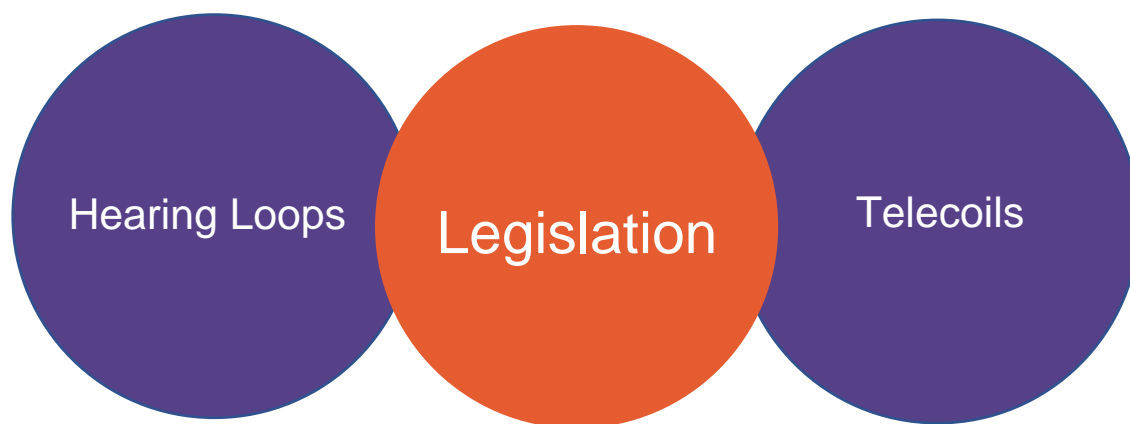
Excerpt from Comparison of Available Assistive Listening Technologies

[https://ihlma.org/wp-content/uploads/2021/11/Comparison\\_of\\_available\\_assistive\\_listening\\_technologies\\_v1.2.pdf](https://ihlma.org/wp-content/uploads/2021/11/Comparison_of_available_assistive_listening_technologies_v1.2.pdf)

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## Legislation

### Creating hearing-friendly communities



Although the ADA became law in 1990, many state and local governments, businesses and individuals are not aware that it included the need for communication access for people with hearing loss.

Across the country, people with hearing loss are tirelessly advocating for hearing loop assistive listening systems and consumer education about telecoils.

Cities and states in the US are hearing the call, getting on the bandwagon, and mandating hearing loops in public places, new construction, transportation and requiring consumer telecoil education at the time of hearing aid purchase.

For additional information about specific states or cities, contact:

[GITHLinfo@hearingloss.org](mailto:GITHLinfo@hearingloss.org)

## Disability Rights Laws

Federal and state laws provide disability rights for people with hearing loss. The most extensive is the Americans with Disabilities Act.

- Section 504 of the Rehabilitation Act of 1973
  - Section 508 of the Rehabilitation Act of 1973
  - Americans with Disabilities Act (ADA), July 26, 1990
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### Section 504

The Rehabilitation Act, enacted in 1973, is a federal anti-discrimination law that addresses federal and federally funded programs in their treatment of individuals with disabilities. Section 504 prohibits denying a person with a disability the opportunity to participate in or benefit from a service, affording a person with a disability to participate in or benefit from a service that is not equal to that afforded others, provide a person with a disability a service that is not offered to others, or otherwise limit a person with a disability from enjoying any right or opportunity enjoyed by others receiving the same benefit. In other words, people with disabilities can receive no more and no less than other qualified individuals receiving the same benefit or service. 29 USC. § 794.

#### Section 504 Regulations

A recipient of federal funding may not: "(i) Deny a qualified handicapped person the opportunity to participate in or benefit from the aid, benefit, or service; (ii) Afford a qualified handicapped person an opportunity to participate in or benefit from the aid, benefit, or service that is not equal to that afforded others; (iii) Provide a qualified handicapped person with an aid, benefit, or service that is not as effective as that provided to others; (iv) Provide different or separate aid, benefits, or services to handicapped persons or to any class of handicapped persons unless such action is necessary to provide qualified handicapped persons with aid, benefits, or services that are as effective as those provided to others ..." 34 CFR § 104.4(b)(i)-(iv), (vii).

Industry-specific regulations:

1. Department of Health and Human Services: Medical providers that receive federal funds must establish an effective communication procedure for "purpose of providing emergency health care." 45 CFR § 84.52(c).
2. Department of Education: Recipients of federal funding must "ensure that no [disabled] student is denied the benefits of, excluded from participation in, or otherwise subjected to discrimination because of the absence of educational auxiliary aids for students with impaired sensory, manual, or speaking skills." 34 CFR § 104.44(d)(1).

### Additional Resources

#### Fact Sheet

<https://www.hhs.gov/sites/default/files/ocr/civilrights/resources/factsheets/504.pdf>

For information on how to file 504 complaints with the appropriate agency, contact:

US Department of Justice  
Civil Rights Division  
950 Pennsylvania Avenue, NW.  
Disability Rights Section - NYAV  
Washington, DC 20530

[www.ada.gov](http://www.ada.gov)

(800) 514-0301 (voice)

(800) 514-0383 (TTY)

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## **Section 508 of the Rehabilitation Act of 1973**

### **Section 508**

With the advent of the Internet, an amendment (Section 508) was signed into law in 1998, expanding the Rehabilitation Act to include equal access to electronic and information technology. Section 508 of the Rehabilitation Act is a fairly broad law that requires all federal electronic and information technology to be accessible to people with disabilities, including employees and the public. 29 USC. § 794(d).

“When developing, procuring, maintaining, or using electronic and information technology, each Federal department or agency ... shall ensure, unless an undue burden would be imposed on the department or agency, that the electronic and information technology allows, regardless of the type of medium of the technology, individuals with disabilities [...] to have access to and use of information and data that is comparable to the access of [those] who are not individuals with disabilities.” 29 USC. § 794(d)(1)(A).

### **Section 508 Regulations**

The technical standards under Section 508 require all analog and digital television displays, as well as computers be equipped with the necessary technology to decode and display closed captions. The technical standards note that the captions must include important non-speech sounds, otherwise known as all aural content. 36 CFR § 1194.

### **Additional Resources**

Section 508:

## Americans with Disabilities Act (ADA)

July 26, 1990

Congress stated the purpose of the ADA is “to provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.”

The Americans with Disabilities Act is divided into four main sections called Titles:

**Title I**—Employment

**Title II**—State and Local Government

**Title III**—Private Entities

**Title IV**—Telecommunications

**Title V**—Miscellaneous

In passing the Americans with Disabilities Act, Congress recognized that individuals with disabilities “encounter various forms of discrimination,” including “communication barriers. 42 USC. § 12101(a)(5).

### Title I—Employment

Title I Applies to employment. No covered entity shall discriminate against a qualified individual on the basis of disability in regard to job application procedures, the hiring, advancement, or discharge of employees, employee compensation, job training, and other terms, conditions, and privileges of employment.

**Resources:** Employment

Title I: Information and Technical Assistance

[https://www.ada.gov/ada\\_title\\_I.htm](https://www.ada.gov/ada_title_I.htm)

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### Title II—State and Local Government

Title II applies to state and local governments and directs that no individual with a disability shall “be excluded from participation in or be denied the benefits of services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.” 42 USC. §§ 12131(1)(A), 12132.

### Title II Regulations

Title II directs that public entities “shall take appropriate steps to ensure that communications with applicants, participants, members of the public, and companions with disabilities are as effective as communications with others.” 28 CFR § 35.160(a)(1).

Public entities must “furnish appropriate auxiliary aids and services where necessary to afford an individual with a disability an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity conducted by a public entity.” 28 CFR § 35.160(b)(1).

**Resources:** State and Local Government

Title II Technical Assistance Manual Covering State and Local Government:  
<https://www.ada.gov/taman2.html>

**Primer for State and Local Government**

[https://www.ada.gov/regs2010/titleII\\_2010/title\\_ii\\_primer.html#generalnonreq](https://www.ada.gov/regs2010/titleII_2010/title_ii_primer.html#generalnonreq)

Project Civic Access: <https://www.ada.gov/civiccommonprobs.htm>

<https://www.ada.gov/civicac.htm>

<https://www.ada.gov/civiccommonprobs.htm>

Project Civic Access Fact Sheet: <https://www.ada.gov/civicfac.htm>

Project Civic Access Toolkit for State and Local Government

<https://www.ada.gov/pcatoolkit/toolkitmain.htm>

ADA Guide for Small Towns: <https://www.ada.gov/smtown.htm>

Filing a Complaint: [https://www.ada.gov/filing\\_complaint.htm](https://www.ada.gov/filing_complaint.htm)

**Title III—Private Entities**

Title III applies to private entities and directs that “[n]o individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of any place of public accommodation.” 42 USC. § 12182(a).

Effective communication is crucial in achieving equal access. Discrimination by public accommodations under Title III includes “a failure to take such steps as may be necessary to ensure that no individual with a disability is excluded, denied services, segregated or otherwise treated differently than other individuals because of the absence of auxiliary aids and services ...” 42 USC. § 12182(b)(2)(A)(iii).

A “public accommodation” includes businesses that are generally open to the public and that fall into one of twelve categories listed in the ADA, such as restaurants, movie theaters, schools, daycare facilities, recreation facilities, and doctors’ offices. 28 CFR § 36.104.

**Title III Regulations**

Places of public accommodation must “furnish appropriate auxiliary aids and services where necessary to ensure effective communication with individuals with disabilities.” 28 CFR § 36.303(c). Closed captions are an established auxiliary aid and service and provide an “effective method of making orally delivered information available to individuals who are deaf or hard of hearing.” 28 CFR 36.303(b)(1)

**Auxiliary Aids and Services****Statute**

Auxiliary aids and services are divided into four categories:

1. Qualified interpreters or other effective methods of making aurally delivered materials available to individuals with hearing impairments
  - a. A “qualified” interpreter means someone who is able to interpret effectively, accurately, and impartially, both receptively (i.e., understanding what the person with the disability is saying) and expressively (i.e., having the skill needed to convey information back to that person) using any necessary specialized vocabulary.
2. Qualified readers, taped texts, or other effective methods of making visually delivered materials available to individuals with visual impairments
3. Acquisition or modification of equipment or devices
4. Other similar services and actions. 42 USC. § 12103(1).

### Regulations

Examples of auxiliary aids and services for people who are deaf/hard of hearing include:

1. Notetakers
2. Communication Access Real-Time Translation (CART)
3. **Written materials/exchange of written notes**
4. Telephone handset amplifiers
5. Assistive listening devices and/or systems
6. Telephones compatible with hearing aids
7. Closed caption decoders
8. Voice, text, and video-based telecommunications products and systems
9. Open and closed captioning, including real-time captioning
10. Videotext displays
11. Accessible electronic and information technology

28 CFR § 36.303(b)(1).

Entities should “consult with individuals with disabilities whenever possible to determine what type of auxiliary aid is needed to ensure effective communication.” However, places of public accommodation are the ultimate deciders of which auxiliary aid to offer “provided that the method chosen results in effective communication.” 28 CFR § 36.303(c)(1)(ii).

**Resources**—Public Accommodation and Commercial Facilities

**Title III Information and Technical Assistance**

[https://www.ada.gov/ada\\_title\\_III.htm](https://www.ada.gov/ada_title_III.htm)

**Department of Justice (DOJ) Standards**

<https://www.access-board.gov/ada/>

Effective communication: <http://www.ada.gov/effective-comm.pdf>



**Summary:** The DOJ revised regulations implementing the ADA in 2010, and these rules clarify and refine issues that have arisen over the past 20 years and contain new, updated

requirements. This document clearly explains the 2010 standards for accessible design, including effective communication, for people who have “communication disabilities.”

**DOJ Advance Notice of Proposed Rulemaking** <http://www.gpo.gov/fdsys/pkg/FR-2010-07-26/pdf/2010-18334.pdf#page=1>

**Summary:** Section 204 (a) of title II and section 306(b) of title III direct the Attorney General to promulgate regulations to carry out the provisions of titles II and III. 42 USC. § 12134.

The DOJ is considering revising the regulations implementing Title III of the ADA in order to establish requirements for making the goods, services, facilities, privileges, accommodations, or advantages offered by public accommodations via the Internet, specifically at sites on the World Wide Web (Web), accessible to individuals with disabilities. DOJ has solicited comments on particular questions. Some specifically address closed captioning. Question 15 of the ANPRM: “What, if any, are the likely or potential unintended consequences (positive or negative) of Web site accessibility requirements? For example, would the costs of a requirement to provide captioning to videos cause covered entities to provide fewer videos on their Web sites?” The comments for this question have not been published yet by the DOJ

#### **Additional Resources**

**The Americans with Disabilities Act (amended 2011):** [http://www.ada.gov/2010\\_regs.htm](http://www.ada.gov/2010_regs.htm)

**List of ADA Enforcement Cases:** [http://www.ada.gov/enforce\\_current.htm](http://www.ada.gov/enforce_current.htm)

## ADA Communication Access

### Quick Links to Department of Justice ADA. 2010 Standards

<https://www.access-board.gov/ada/>

ADA Sections related to communication access 216, 219, 703 706

#### Section 216 Signs

<https://www.access-board.gov/ada/#ada-216>

#### Section 219 Assistive Listening Systems

<https://www.access-board.gov/ada/#ada-219>

#### Section 703 Signs

<https://www.access-board.gov/ada/#ada-703>

#### Section 706 Assistive Listening Systems

<https://www.access-board.gov/ada/#ada-706>

### 216 Signs

The following types of signs, though they are not expressly subject to the 1991 Standards requirement for signs, will now be explicitly exempted by sections 216 and 703 of the 2010 Standards. These types of signs include seat and row designations in assembly areas; occupant names, building addresses; company names and logos; signs in parking facilities (except those identifying accessible parking spaces and means of egress); and exterior signs identifying permanent rooms and spaces that are not located at the door to the space they serve. This requirement also clarifies that the exception for temporary signs applies to signs used for seven days or less.

The 2010 Standards retain the option to provide one sign where both visual and tactile characters are provided or two signs, one with visual, and one with tactile characters.

**216.1 General.** Signs shall be provided in accordance with 216 and shall comply with 703.

#### EXCEPTIONS:

1. Building directories, menus, seat and row designations in assembly areas, occupant names, building addresses, and company names and logos shall not be required to comply with 216.
2. In parking facilities, signs shall not be required to comply with 216.2, 216.3, and 216.6 through 216.12.
3. Temporary, 7 days or less, signs shall not be required to comply with 216.
4. In detention and correctional facilities, signs not located in public use areas shall not be required to comply with 216.

**216.2 Designations.** Interior and exterior signs identifying permanent rooms and spaces shall comply with 703.1, 703.2, and 703.5. Where pictograms are provided as designations of permanent interior rooms and spaces, the pictograms shall comply with 703.6 and shall have text descriptors complying with 703.2 and 703.5.

**EXCEPTION:** Exterior signs that are not located at the door to the space they serve shall not be required to comply with 703.2.

**Advisory 216.2 Designations.** Section 216.2 applies to signs that provide designations, labels, or names for interior rooms or spaces where the sign is not likely to change over time. Examples include interior signs labeling restrooms, room and floor

numbers or letters, and room names. Tactile text descriptors are required for pictograms that are provided to label or identify a permanent room or space. Pictograms that provide information about a room or space, such as “no smoking,” occupant logos, and the International Symbol of Accessibility, are not required to have text descriptors.

**216.3 Directional and Informational Signs.** Signs that provide direction to or information about interior spaces and facilities of the site shall comply with 703.5.

**Advisory 216.3 Directional and Informational Signs.** Information about interior spaces and facilities includes rules of conduct, occupant load, and similar signs. Signs providing direction to rooms or spaces include those that identify egress routes.

**216.4 Means of Egress.** Signs for means of egress shall comply with 216.4.

**216.4.1 Exit Doors.** Doors at exit passageways, exit discharge, and exit stairways shall be identified by tactile signs complying with 703.1, 703.2, and 703.5.

**Advisory 216.4.1 Exit Doors.** An exit passageway is a horizontal exit component that is separated from the interior spaces of the building by fire-resistance-rated construction, and that leads to the exit discharge or public way. The exit discharge is that portion of an egress system between the termination of an exit and a public way.

**216.4.2 Areas of Refuge.** Signs required by section 1003.2.13.5.4 of the International Building Code (2000 edition) or section 1007.6.4 of the International Building Code (2003 edition) (incorporated by reference, see “Referenced Standards” in Chapter 1) to provide instructions in areas of refuge shall comply with 703.5.

**216.4.3 Directional Signs.** Signs required by section 1003.2.13.6 of the International Building Code (2000 edition) or section 1007.7 of the International Building Code (2003 edition) (incorporated by reference, see “Referenced Standards” in Chapter 1) to provide directions to accessible means of egress shall comply with 703.5.

**216.5 Parking.** Parking spaces complying with 502 shall be identified by signs complying with 502.6.

**EXCEPTIONS:**

1. Where a total of four or fewer parking spaces, including accessible parking spaces, are provided on a site, identification of accessible parking spaces shall not be required.
2. In residential facilities, where parking spaces are assigned to specific residential dwelling units, identification of accessible parking spaces shall not be required.

**216.6 Entrances.** Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.

**Advisory 216.6 Entrances.** Where a directional sign is required, it should be located to minimize backtracking. In some cases, this could mean locating a sign at the beginning of a route, not just at the inaccessible entrances to a building.

**216.10 Assistive Listening Systems.** Each assembly area required by 219 to provide assistive listening systems shall provide signs informing patrons of the availability of the assistive listening system. Assistive listening signs shall comply with 703.5 and shall include the International Symbol of Access for Hearing Loss complying with 703.7.2.4.

**EXCEPTION:** Where ticket offices or windows are provided, signs shall not be required at each assembly area provided that signs are displayed at each ticket office or window informing patrons of the availability of assistive listening systems.

**219 Assistive Listening Systems**

General. Assistive listening systems shall be provided in accordance with 219 and shall comply with 706.

Required Systems. In each assembly area where audible communication is integral to the use of the space, an assistive listening system shall be provided.

**EXCEPTION:** Other than in courtrooms, assistive listening systems shall not be required where audio amplification is not provided.

Receivers. Receivers complying with 706.2 shall be provided for assistive listening systems in each assembly area in accordance with Table 219.3.

**EXCEPTIONS:** 1. Where a building contains more than one assembly area and the assembly areas required to provide assistive listening systems are under one management, the total number of required receivers shall be permitted to be calculated according to the total number of seats in the assembly areas in the building provided that all receivers are usable with all systems.

2. Where all seats in an assembly area are served by an induction loop assistive listening system, the minimum number of receivers required by Table 219.3 to be hearing-aid compatible shall not be required to be provided.

| Capacity of Seating in Assembly Area | Minimum Number of Required Receivers           | Minimum Number of Required Hearing-aid Compatible Receivers |
|--------------------------------------|--|---|
| 50 or less                           | 2  | 2   |
| 51 to 200                            | 2, plus 1 per 25 seats over 50 <sup>1</sup>    | 2   |
| 201 to 500                           | 2, plus 1 per 25 seats over 50 <sup>1</sup>    | 1 per 4 receivers <sup>1</sup>                              |
| 501 to 1000                          | 20, plus 1 per 33 seats over 500 <sup>1</sup>  | 1 per 4 receivers <sup>1</sup>                              |
| 1001 to 2000                         | 35, plus 1 per 50 seats over 1000 <sup>1</sup> | 1 per 4 receivers <sup>1</sup>                              |
| 2001 and over                        | 55 plus 1 per 100 seats over 2000 <sup>1</sup> | 1 per 4 receivers <sup>1</sup>                              |

Table 219.3 Receivers for Assistive Listening Systems. \*1. Or fraction thereof.

### 703 Sign

703.6 Pictograms. Pictograms shall comply with 703.6.

703.6.1 Pictogram Field. Pictograms shall have a field height of 6 inches (150 mm) minimum. Characters and braille shall not be located in the pictogram field.

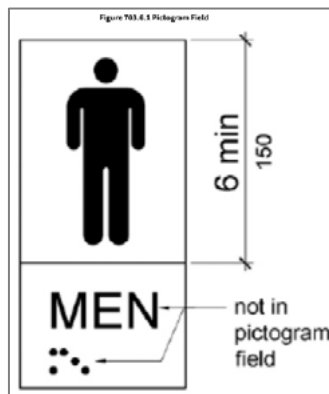


Figure 703.6.1 Pictogram Field

703.6.2 Finish and Contrast. Pictograms and their field shall have a non-glare finish. Pictograms shall contrast with their field with either a light pictogram on a dark field or a dark pictogram on a light field.

Advisory 703.6.2 Finish and Contrast. Signs are more legible for persons with low vision when characters contrast as much as possible with their background. Additional factors affecting the ease with which the text can be distinguished from its background include shadows cast by lighting sources, surface glare, and the uniformity of the text and background colors and textures.

703.6.3 Text Descriptors. Pictograms shall have text descriptors located directly below the pictogram field. Text descriptors shall comply with 703.2, 703.3, and 703.4.

703.7 Symbols of Accessibility. Symbols of accessibility shall comply with 703.7.

703.7.1 Finish and Contrast. Symbols of accessibility and their background shall have a non-glare finish. Symbols of accessibility shall contrast with their background with either a light symbol on a dark background or a dark symbol on a light background.

Advisory 703.7.1 Finish and Contrast. Signs are more legible for persons with low vision when characters contrast as much as possible with their background. Additional factors affecting the ease with which the text can be distinguished from its background include

shadows cast by lighting sources, surface glare, and the uniformity of the text and background colors and textures.

703.7.2.4 Assistive Listening Systems. Assistive listening systems shall be identified by the International Symbol of Access for Hearing Loss, complying with Figure 703.7.2.4.

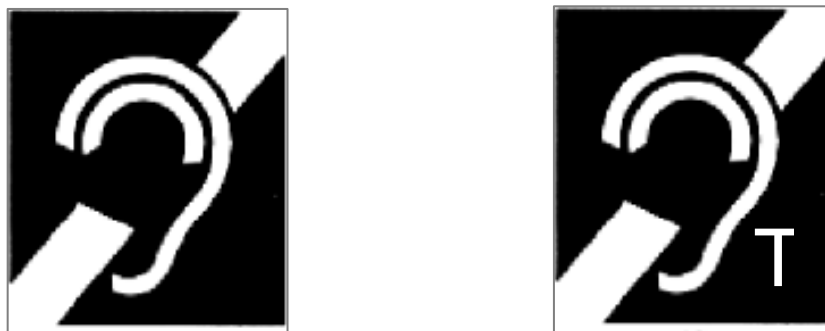


Figure 703.7.2.4  
International Symbol of Access for Hearing Loss

NOTE: It has become widespread practice for the symbol to be modified with the addition of a "T" to indicate a Hearing Loop Assistive Listening System.

## 706 Assistive Listening Systems

**706.1 General.** Assistive listening systems required in assembly areas shall comply with 706.

**Advisory 706.1 General.** Assistive listening systems are generally categorized by their mode of transmission. There are hard-wired systems and three types of wireless systems: induction loop, infrared, and F.M. radio transmission. Each has different advantages and disadvantages that

can help determine which system is best for a given application. For example, an FM system may be better than an infrared system in some open-air assemblies since infrared signals are less effective in sunlight. On the other hand, an infrared system is typically a better choice than an FM system, where confidential transmission is important because it will be contained within a given space.

The technical standards for assistive listening systems describe minimum performance levels for volume, interference, and distortion. Sound pressure levels (SPL), expressed in decibels, measure output sound volume. Signal-to-noise ratio (SNR or S/N), also expressed in decibels, represents the relationship between the loudness of a desired sound (the signal) and the background noise in a space or piece of equipment. The higher the SNR, the more intelligible the signal. The peak clipping level limits the distortion in signal output produced when high-volume sound waves are manipulated to serve assistive listening devices.

Selecting or specifying an effective assistive listening system for a large or complex venue requires assistance from a professional sound engineer. The Access Board has published technical assistance on assistive listening devices and systems.

**706.2 Receiver Jacks.** Receivers required for use with an assistive listening system shall include a 1/8 inch (3.2 mm) standard mono jack.

**706.3 Receiver Hearing-Aid Compatibility.** Receivers required to be hearing-aid compatible shall interface with telecoils in hearing aids through the provision of neckloops.

**Advisory 706.3 Receiver Hearing-Aid Compatibility.** Neckloops and headsets that can be worn as neckloops are compatible with hearing aids. Receivers that are not compatible include earbuds, which may require removal of hearing aids, earphones, and headsets that must be worn over the ear, which can create disruptive interference in the transmission and can be uncomfortable for people wearing hearing aids.

**706.4 Sound Pressure Level.** Assistive listening systems shall be capable of providing a sound pressure level of 110 dB minimum and 118 dB maximum with a dynamic range on the volume control of 50 dB.

**706.5 Signal-to-Noise Ratio.** The signal-to-noise ratio for internally generated noise in assistive listening systems shall be 18 dB minimum.

**706.6 Peak Clipping Level.** Peak clipping shall not exceed 18 dB of clipping relative to the peaks of speech.

## ADA Effective Communication

Link to printable version [HERE](#)

<https://www.ada.gov/effective-comm.htm>

U.S. Department of Justice  
Civil Rights Division  
Disability Rights Section



## Effective Communication

### Overview

The Department of Justice published revised final regulations implementing the Americans with Disabilities Act (ADA) for title II (State and local government services) and title III (public accommodations and commercial facilities) on September 15, 2010, in the Federal Register. These requirements, or rules, clarify and refine issues that have arisen over the past 20 years and contain new, and updated, requirements, including the 2010 Standards for Accessible Design (2010 Standards).

**People who have vision, hearing, or speech disabilities (“communication disabilities”) use different ways to communicate. For example, people who are blind may give and receive information audibly rather than in writing and people who are deaf may give and receive information through writing or sign language rather than through speech.**

The ADA requires that title II entities (State and local governments) and title III entities (businesses and nonprofit organizations that serve the public) communicate effectively with people who have communication disabilities. The goal is to ensure that communication with people with these disabilities is equally effective as communication with people without disabilities.

This publication is designed to help title II and title III entities (“covered entities”) understand how the rules for effective communication, including rules that went into effect on March 15, 2011, apply to them.

- The purpose of the effective communication rules is to ensure that the person with a vision, hearing, or speech disability can communicate with, receive information from, and convey information to, the covered entity.
- Covered entities must provide auxiliary aids and services when needed to communicate effectively with people who have communication disabilities.
- The key to communicating effectively is to consider the nature, length, complexity, and context of the communication and the person’s normal method(s) of communication.



## ADA Effective Communication

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### Effective Communication

- The rules apply to communicating with the person who is receiving the covered entity's goods or services as well as with that person's parent, spouse, or companion in appropriate circumstances.

### Auxiliary Aids and Services

The ADA uses the term "auxiliary aids and services" ("aids and services") to refer to the ways to communicate with people who have communication disabilities.

- For people who are blind, have vision loss, or are deaf-blind, this includes providing a qualified reader; information in large print, Braille, or electronically for use with a computer screen-reading program; or an audio recording of printed information. A "qualified" reader means someone who is able to read effectively, accurately, and impartially, using any necessary specialized vocabulary.
- For people who are deaf, have hearing loss, or are deaf-blind, this includes providing a qualified notetaker; a qualified sign language interpreter, oral interpreter, cued-speech interpreter, or tactile interpreter; real-time captioning; written materials; or a printed script of a stock speech (such as given on a museum or historic house tour). A "qualified" interpreter means someone who is able to interpret effectively, accurately, and impartially, both receptively (i.e., understanding what the person with the disability is saying) and expressively (i.e., having the skill needed

to convey information back to that person) using any necessary specialized vocabulary.

- For people who have speech disabilities, this may include providing a qualified speech-to-speech transliterator (a person trained to recognize unclear speech and repeat it clearly), especially if the person will be speaking at length, such as giving testimony in court, or just taking more time to communicate with someone who uses a communication board. In some situations, keeping paper and pencil on hand so the person can write out words that staff cannot understand or simply allowing more time to communicate with someone who uses a communication board or device may provide effective communication. Staff should always listen attentively and not be afraid or embarrassed to ask the person to repeat a word or phrase they do not understand.

In addition, aids and services include a wide variety of technologies including 1) assistive listening systems and devices; 2) open captioning, closed captioning, real-time captioning, and closed caption decoders and devices; 3) telephone handset amplifiers, hearing-aid compatible telephones, text telephones (TTYs), videophones, captioned telephones, and other voice, text, and video-based telecommunications products; 4) videotext displays; 5) screen reader software, magnification software, and optical readers; 6) video description and secondary auditory programming (SAP) devices that pick up video-described audio feeds for television programs; 7) accessibility features in electronic documents and other electronic

## ADA Effective Communication

Link to printable version [HERE](#)

<https://www.ada.gov/effective-comm.htm>

### Effective Communication

and information technology that is accessible (either independently or through assistive technology such as screen readers).

**Real-time captioning** (also known as computer-assisted real-time transcription, or CART) is a service similar to court reporting in which a transcriber types what is being said at a meeting or event into a computer that projects the words onto a screen. This service, which can be provided on-site or remotely, is particularly useful for people who are deaf or have hearing loss but do not use sign language.

The free nationwide **telecommunications relay service** (TRS), reached by calling 7-1-1, uses communications assistants (also called CAs or relay operators) who serve as intermediaries between people who have hearing or speech disabilities who use a text telephone (TTY) or text messaging and people who use standard voice telephones. The communications assistant tells the telephone user what the other party is typing and types to tell the other party what the telephone user is saying. TRS also provides speech-to-speech transliteration for callers who have speech disabilities.

**Video relay service** (VRS) is a free, subscriber-based service for people who use sign language and have videophones, smart phones, or computers with video communication capabilities. For outgoing calls, the subscriber contacts the VRS interpreter, who places the call and serves as an intermediary between the subscriber and a person who uses a standard voice telephone. The interpreter tells the telephone user what the subscriber is signing and signs to the subscriber what the telephone user is saying.

**Video remote interpreting** (VRI) is a fee-based service that uses video conferencing technology to access an off-site interpreter to provide real-time sign language or oral interpreting services for conversations between hearing people and people who are deaf or have hearing loss. The new regulations give covered entities the choice of using VRI or on-site interpreters in situations where either would be effective. VRI can be especially useful in rural areas where on-site interpreters may be difficult to obtain. Additionally, there may be some cost advantages in using VRI in certain circumstances. However, VRI will not be effective in all circumstances. For example, it will not be effective if the person who needs the interpreter has difficulty seeing the screen (either because of vision loss or because he or she cannot be properly positioned to see the screen, because of an injury or other condition). In these circumstances, an on-site interpreter may be required.

If VRI is chosen, **all** of the following specific performance standards must be met:

- real-time, full-motion video and audio over a dedicated high-speed, wide-bandwidth video connection or wireless connection that delivers high-quality video images that do not produce lags, choppy, blurry, or grainy images, or irregular pauses in communication;
- a sharply delineated image that is large enough to display the interpreter's face, arms, hands, and fingers, and the face, arms, hands, and fingers of the person using sign language, regardless of his or her body position;

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- a clear, audible transmission of voices; and
- adequate staff training to ensure quick set-up and proper operation.

#### Effective Communication Provisions

Covered entities must provide aids and services when needed to communicate effectively with people who have communication disabilities.

The key to deciding what aid or service is needed to communicate *effectively* is to consider the nature, length, complexity, and context of the communication as well as the person's normal method(s) of communication.

Some easy solutions work in relatively simple and straightforward situations. For example:

- In a lunchroom or restaurant, reading the menu to a person who is blind allows that person to decide what dish to order.
- In a retail setting, pointing to product information or writing notes back and forth to answer simple questions about a product may allow a person who is deaf to decide whether to purchase the product.

**Many deaf-blind individuals use support service providers (SSPs) to assist them in accessing the world around them. SSPs are not "aids and services" under the ADA. However, they provide mobility, orientation, and informal communication services for deaf-blind individuals and are a critically important link enabling them to independently access the community at large.**

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Other solutions may be needed where the information being communicated is more extensive or complex. For example:

- In a law firm, providing an accessible electronic copy of a legal document that is being drafted for a client who is blind allows the client to read the draft at home using a computer screen-reading program.
- In a doctor's office, an interpreter generally will be needed for taking the medical history of a patient who uses sign language or for discussing a serious diagnosis and its treatment options.

A person's method(s) of communication are also key. For example, sign language interpreters are effective only for people who use sign language. Other methods of communication, such as those described above, are needed for people who may have lost their hearing later in life and do not use sign language. Similarly, Braille is effective only for people who read Braille. Other methods are needed for people with vision disabilities who do not read Braille, such as providing accessible electronic text documents, forms, etc., that can be accessed by the person's screen reader program.

Covered entities are also required to accept telephone calls placed through TRS and VRS, and staff who answer the telephone must treat relay calls just like other calls.

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| <p>The communications assistant will explain how the system works if necessary.</p> <p>Remember, the purpose of the effective communication rules is to ensure that the person with a communication disability can receive information from, and convey information to, the covered entity.</p>  | <p>The ADA places responsibility for providing effective communication, including the use of interpreters, directly on covered entities. They cannot require a person to bring someone to interpret for him or her. A covered entity can rely on a companion to interpret in only two situations.</p>  |
| <div style="background-color: #333; color: white; text-align: center; padding: 5px;"><b>Companions</b></div> <p>In many situations, covered entities communicate with someone other than the person who is receiving their goods or services. For example, school staff usually talk to a parent about a child's progress; hospital staff often talk to a patient's spouse, other relative, or friend about the patient's condition or prognosis. The rules refer to such people as "companions" and require covered entities to provide effective communication for companions who have communication disabilities.</p> <p>The term "companion" includes any family member, friend, or associate of a person seeking or receiving an entity's goods or services who is an appropriate person with whom the entity should communicate.</p> | <p>(1) In an emergency involving an imminent threat to the safety or welfare of an individual or the public, an adult or minor child accompanying a person who uses sign language may be relied upon to interpret or facilitate communication only when a qualified interpreter is not available.</p> <p>(2) In situations <b>not</b> involving an imminent threat, an adult accompanying someone who uses sign language may be relied upon to interpret or facilitate communication when a) the individual requests this, b) the accompanying adult agrees, and c) reliance on the accompanying adult is appropriate under the circumstances. This exception does <b>not</b> apply to minor children.</p> |
| <div style="background-color: #333; color: white; text-align: center; padding: 5px;"><b>Use of Accompanying Adults or Children as Interpreters</b></div> <p>Historically, many covered entities have expected a person who uses sign language to bring a family member or friend to interpret for him or her. These people often lacked the impartiality and specialized vocabulary needed to interpret effectively and accurately. It was particularly problematic to use people's children as interpreters.</p>  | <p>Even under exception (2), covered entities may <b>not</b> rely on an accompanying adult to interpret when there is reason to doubt the person's impartiality or effectiveness. For example:</p> <ul style="list-style-type: none"> <li>• It would be inappropriate to rely on a companion to interpret who feels conflicted about communicating bad news to the person or has a personal stake in the outcome of a situation.</li> <li>• When responding to a call alleging spousal abuse, police should never rely on one spouse to interpret for the other spouse.</li> </ul>   |
| <div style="background-color: #333; color: white; padding: 2px 5px;">ADA Requirements 5</div>  |  |

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### Effective Communication

#### Who Decides Which Aid or Service Is Needed?

When choosing an aid or service, title II entities are **required** to give primary consideration to the choice of aid or service requested by the person who has a communication disability. The state or local government must honor the person's choice, unless it can demonstrate that another equally effective means of communication is available, or that the use of the means chosen would result in a fundamental alteration or in an undue burden (see limitations below). If the choice expressed by the person with a disability would result in an undue burden or a fundamental alteration, the public entity still has an obligation to provide an alternative aid or service that provides effective communication if one is available.

Covered entities may require reasonable advance notice from people requesting aids or services, based on the length of time needed to acquire the aid or service, but may not impose excessive advance notice requirements. "Walk-in" requests for aids and services must also be honored to the extent possible.

Title III entities are **encouraged** to consult with the person with a disability to discuss what aid or service is appropriate. The goal is to provide an aid or service that will be effective, given the nature of what is being communicated and the person's method of communicating.

#### Limitations

Covered entities are required to provide aids and services unless doing so would result in an "undue burden," which is defined as significant difficulty or expense. If a particu-

lar aid or service would result in an undue burden, the entity must provide another effective aid or service, if possible, that would not result in an undue burden. Determining what constitutes an undue burden will vary from entity to entity and sometimes from one year to the next. The impact of changing economic conditions on the resources available to an entity may also be taken into consideration in making this determination.

**State and local governments:** in determining whether a particular aid or service would result in undue financial and administrative burdens, a title II entity should take into consideration the cost of the particular

aid or service in light of all resources available to fund the program, service, or activity and the effect on other expenses or operations. The decision that a particular aid or service would result in an undue burden must be

made by a high level official, no lower than a Department head, and must include a written statement of the reasons for reaching that conclusion.

**Businesses and nonprofits:** in determining whether a particular aid or service would result in an undue burden, a title III entity should take into consideration the nature and cost of the aid or service relative to their size, overall financial resources, and overall expenses. In general, a business or nonprofit with greater resources is expected to do more to ensure effective communication than one with fewer resources. If the

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entity has a parent company, the administrative and financial relationship, as well as the size, resources, and expenses of the parent company, would also be considered.

In addition, covered entities are not required to provide any particular aid or service in those rare circumstances where it would fundamentally alter the nature of the goods or services they provide to the public. In the performing arts, for example, slowing down the action on stage in order to describe the action for patrons who are blind or have vision loss may fundamentally alter the nature of a play or dance performance.

**Staff Training**

A critical and often overlooked component of ensuring success is comprehensive and ongoing staff training. Covered entities may have established good policies, but if front line staff are not aware of them or do not know how to implement them, problems can arise. Covered entities should teach staff about the ADA's requirements for communicating effectively with people who have communication disabilities. Many local disability organizations, including Centers for Independent Living, conduct ADA trainings in their communities. The Department's ADA Information Line can provide local contact information for these organizations.

**For more information about the ADA, please visit our website or call our toll-free number.**

ADA Website: [www.ADA.gov](http://www.ADA.gov)

To receive e-mail notifications when new ADA information is available, visit the ADA Website and click on the link near the bottom of the right-hand column.

**ADA Information Line**

800-514-0301 (Voice) and  
800-514-0383 (TTY)

Call M-W, F 9:30 a.m. – 5:30 p.m., Th 12:30 p.m. – 5:30 p.m., (Eastern Time) to speak with an ADA Specialist (calls are confidential) or call 24 hours a day to order publications by mail.

For people with disabilities, this publication is available in alternate formats.

Duplication of this document is encouraged.

January 2014

**ADA Requirements 7**

# How to File a Complaint with the US Department of Justice



Information and Technical Assistance on the Americans with Disabilities Act

## Link to Technical Assistance

You can file an Americans with Disabilities Act (ADA) complaint alleging disability discrimination against a State or local government or a public accommodation (private business including, for example, a restaurant, doctor's office, retail store, hotel, etc.).

**Information about filing a complaint**  
<https://beta.ada.gov/file-a-complaint/>

A complaint can be filed online using the link below, by mail, or by facsimile.

**To file an ADA complaint online:**

[Americans with Disabilities Act Discrimination Online Complaint Form](#)

You may file a complaint in one of two ways, by mail or by facsimile. Instructions for submitting attachments are on the form.

**To file an ADA complaint by mail,** send the completed ADA complaint form to:

US Department of Justice  
950 Pennsylvania Avenue, NW  
Civil Rights Division  
Disability Rights Section  
Washington, DC 20530

**To file an ADA complaint by facsimile,** fax the completed ADA complaint form to (202) 307-1197

Please keep a copy of your complaint and the original documents for your own records.

## Ordering and Printing GITHL Toolkit Documents and Materials

Documents in the GITHL Toolkit are available to order in the HLAA Online Store:

- Hearing Loss Facts and Statistics
- Are You Hearing Everything You Could?
- A Guide to Understanding Hearing Loops.

### HLAA Online Store

Print materials and promotional items can be ordered through the [HLAAOnlineStore](#) by chapters, HLAA members, and non-members. Many items can be requested in single or bulk quantities, and a selection of pre-made packets are also available.

We ask that all materials be ordered through the store and not directly through HLAA. The national office does not keep a large inventory of items on hand, nor do we have sufficient staff to be able to fulfill orders. However, if you have a special request, please contact us directly.

Documents are provided free of charge except for shipping charges. If you click on the orange HLAA Online store above, you can create an account and view shipping charges for orders.





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[GITHLinfo@hearingloss.org](mailto:GITHLinfo@hearingloss.org)