

Mid-Atlantic ADA Center

Effective Communication in the Criminal Justice System: Lessons from Case Law

January 24, 2019

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>> MAYNOR GUILLEN: I will now turn it over to our session moderator Caleb Berkemeir.

>> CALEB BERKEMEIR: Thanks. On behalf of the MidAtlantic ADA Center and TransCen, Inc., I want to welcome everyone to today's webinar. This is the second episode in our lessons from case law series where we are taking a look at different concepts from the ADA, from a perspective of how they have been interpreted by the courts. So we thought this would be an interesting way to learn about or reinforce that knowledge and come to understand how the courts are talking about these concepts.

Let's introduce today our presenter, Rachel Weisberg. Rachel is a staff attorney at Equip for Equality where she has represented hundreds of clients in individual and systemic disability discrimination cases under Titles I, II, and III of the ADA and analogous state and local law as well as direct advocacy services in administrative and judicial forums. Rachel also manages Equip

for Equality's employment rights help line, which aims to expand employment opportunities by providing legal and practical advice to applicants and individuals with disabilities. Rachel was a frequent trainer on the Disability Rights laws and speaks regularly at national conferences and webinars. Prior to Equip for Equality she worked for the Civil and Disability Rights Bureau and a law clerk for Chief Judge James Jacar in the Northern District of Ohio. Before law school Rachel was a specialist with the ADA center. And we are pleased to have her back with us. Rachel, I will turn it over to you.

>> RACHEL WEISBERG: Okay. Thank you, Caleb and thank you, Maynor. I'm really thrilled to be back for this three part series. And really so glad to be partnering with the ADA center. As Caleb mentioned I did work there before going to law school. It is fun to reconnect with some of my old friends and glad we have the opportunity today to talk about effective communication in the criminal justice system. This is a really important topic. It is one that I have been working on for the last decade or so. And we'll talk about that case as we move forward in today's webinar.

So some quick housekeeping before we start. This session is available for .75 hours of continuing legal education credit for attorneys. Equip for Equality is a CLE provider in Illinois. We can give anybody who is an Illinois attorney .75 hours of CLE. If you are an attorney in an different state, we have had some information given to us that other states will accept our CLE certification. We can't promise. But it is worth a shot. So what I need you to do if you are an attorney participating in today's session send me an e-mail following the session confirming that you listened to the whole thing. And I will get you hooked up with CLE certifications.

Okay. So here's a plan for today. And I'm sorry, I think I am supposed to be announcing the slides, too. We are on slide 16. We are going to start with a refresher on ADA effective

communication requirements. Then we are going to do a deep dive in how these effective communication requirements have been interpreted and applied in two kind of areas of criminal justice. We'll start by looking at law enforcement and then we'll move on to look at correctional facilities and each of those there are a number of things that we picked out that we think are unique to those areas. And at the end we'll recap the lessons that we have learned.

So moving on to slide 17,

Anyway as a quick refresher remember that entities are going to be titled the ADA as state or local government entities, Rehabilitation Act or both and also recall that we have got this general requirement under the ADA called the Effective Communication requirement and what that says is that any covered entity when it is necessary to communicate effectively with people who have communication disabilities.

So what are auxiliary aids and services? Really they are things that are devices that help make information and content available. So the ADA gives us some examples. And just to name a few of the examples, things like providing information in Braille or in accessible electronic format. Those are auxiliary aids and services, providing qualified sign language interpreters or using communication boards. Those are auxiliary aids and services. So the key -- the question is how do we know which of those auxiliary aids and services we need to provide to someone who has a communication disability? The key is to consider length and complexity and content of the communication and person's normal mode of communication. So you can see somebody who has a disability and they are going to need different types of auxiliary aids and services based on the complexity of the communication. So a typical example, we have got someone who is deaf. That person goes to a restaurant while they may be able to order with a pen and

paper or through lip reading because that's a short simple and unimportant communication. You take that same individual who communicates through American Sign Language and you put them in the doctor's office talking about important medical information. A pen and paper is no longer going to be sufficient. That individual is going to need an American Sign Language interpreter.

So another important principle that we apply for Title II entities is this concept of primary consideration. That's a concept we keep in mind in what auxiliary aid to provide. It means that Title II entities need to give primary consideration to the choice of the aid or service that's requested by the person with a disability. And both the Department of Justice and the courts have said what that means is that the individual's choice has to be honored and lastly can demonstrate that another equally effective means of communication is available or providing that accommodation or aid or service would result in an undue burden or fundamental alteration. This places a higher standard on Title II entities. Title III are supposed to confer. But it really -- it is an important concept because people --

>> RACHEL WEISBERG: And at the bottom of this slide there is a link to a Department of Justice guidance document all about the general principles of effective communication which, of course, comes from the Title II regulations.

So moving on to the next slide, I want to kind of give a quick caveat before we jump right in. With that said you will notice from today's presentation that the vast majority of cases have been about people who are deaf and hard-of-hearing. I tried my best to throw in a couple of other disabilities but there is just not that much out there. But I wanted to make really clear that even though the cases are focused on people who are deaf and hard-of-hearing these principles are going to apply to people with all different types

of communication related disabilities.

Okay. With all of those caveats and that background let's jump in and see how these principles play out in the criminal justice system. And Caleb, I am going to try to move this forward.

>> RACHEL WEISBERG: It looks like it is working from my end. Okay. Great. So the law enforcement poses some pretty interesting and unique issues because, you know, oftentimes police officers arrive on a scene that may be dangerous and there may be people who are engaging in violent and very dangerous conduct. And so the question is how did that interplay with the requirement that we need to provide effective communication. So a term that you will see on -- kind of seeing a lot today and we hear and see in the cases is this term exigent circumstances. That's when you arrive on the scene and we need to act quickly because there is the imminent risk of harm or danger. As a preliminary legal issue, the question does the ADA apply when you are entering this sort of exigent circumstances. The Department of Justice and most courts say yes, of course, the ADA applies. The ADA applies to everything that a state or local government does, right? So it is going to apply to all aspects of law enforcement even including communications that you have before an arrest. If it is a true exigent circumstance that might be a relevant factor in deciding what auxiliary aid or service has to be provided.

In my humble opinion that's the correct legal interpretation and it is also again the one that the Department of Justice and most courts say. I do want to point out that there are a couple of courts, it is the minority view that have come up with this thing called the Hanes exception and what that means is they are saying the ADA doesn't apply to officers on the street responses before securing the scene and ensuring there is no threat to human life. It is not the majority position but it is the position in the fifth circuit.

Okay. So what's our lesson? Our lesson is that regardless of the legal framework that we are going to work in, law enforcement is going to communicate with people in these emergency circumstances and in more routine nonemergency communications. And it is critical for law enforcement entities to really think through and create policies, practices about how to engage in communications in both those emergency and nonemergency situations.

I'm going to add in a bonus lesson here and that is also to provide training. Training, training and real life training to think through what to do in these situations. Look at a case that helps us make this little less of a hypothetical. So in the Bircoll case versus Miami-Dade County we have a plaintiff who is deaf and he was pulled over during a traffic stop. He requested an oral interpreter. The officer didn't give him one. The officer instead offered to finger spell in sign language which the plaintiff explained he didn't know. The officers spoke loudly instead. He was given a field sobriety test and taken to the police station for a toxilizer test. He was not given effective communication because he was not given this oral interpreter.

Slide 20, in defense of the ADA lawsuit the county argued hey, this police officer wasn't engaged in this exigent circumstance. This entire arrest should be exempt from the ADA, relying on that exemption that we talked about. The court which is the 11th circuit disagreed and it is Alabama and Georgia and Florida but instead they said that the exigent circumstances presented by federal activity in the already onerous task go more to the reasonableness of the requested ADA modification than whether the ADA applies in the first instance.

So yes, the ADA absolutely applies. But, you know, given these unique exigent circumstances it may not be reasonable to stop this

activity and wait for an interpreter. That's what the 11th circuit found. Given these exigent circumstances this individual had a DUI stop on the highway and required some on the spot judgment and serious safety concerns. And it was not a situation where the police had to wait for an on the site interpreter to arrive. The court also noted as a practical matter waiting for an interpreter may have altered this individual's blood alcohol level and would have altered the results. So it wasn't going to be reasonable from that perspective as well.

I want to emphasize that the court really emphasized that these circumstances of the DUI arrest on the roadside are really different from those of an officer in other situations, like at a school or a police station. And the court also noted that unlike a lot of individuals who are deaf, this individual's primary mode of communication was lipreading and he was able to speak with an impediment.

Slide 21, so now that we know that in truly, truly exigent circumstances we may not need to wait to supply the individual's effective mode of communication. The next lesson it is still important that we don't overextend that argument. They require immediate action. This Taylor versus Mason case. It involves two people. We have a deaf man named Mr. Taylor and he uses ASL as a primary mode of communication. And then we have Ms. Disking. There was an issue where the two essentially alleged that the other assaulted them. Mr. Taylor called the police. The police arrived on the scene. Mr. Taylor requested that he be provided with an American Sign Language interpreter. And the police called and, you know, requested an American Sign Language interpreter to arrive. So far everything seems to be going okay, but the problem instead of waiting for that qualified American Sign Language interpreter to arrive, the police just moved

forward and they used this woman as an interpreter. So Mr. Taylor filed an ADA lawsuit and the court ultimately found for the plaintiff by denying the law enforcement's motion to dismiss. And they said, you know, this was not one of these exigent circumstances where you had to move immediately. And you could wait and not wait for that interpreter to arrive. In this circumstance even though yes, it was a police arriving after a telephone call, you didn't have these types of exigent circumstances. The police should have waited for a qualified interpreter to arrive.

Looking at slide 22 and that's right, ADA's regulations, of course, outline when it is okay to rely on an accompanying adult to facilitate communication and they give two kind of -- two different reasons. One is that there is an emergency with imminent threat to the safety of an individual. And the second is when an individual specifically requests a use of an accompanying adult and reliance on that accompanying adult is appropriate. We know that the woman was certainly not an appropriate person to use. She was both accusing this individual of assaulting her and was being accused of engaging in assault. And this individual Mr. Taylor never consented to the use. And so it was also a problematic interaction for that reason.

This case also gives us some information about the communication at the police station. Mr. Taylor was then taken to the police station. He was given an interpreter who wasn't ASL certified. As we all know, ADA doesn't really speak in terms of ASL certified. It speaks in the terms of having a qualified interpreter. But in any event the man complained that the interpreter wasn't effective for him, wasn't really working out and the city refused to replace the interpreter. So looking at that primary consideration language the court said you know when a law enforcement agency decides not defer to a deaf individual's request, the burden is on the law enforcement to ensure that

communications with deaf individuals are as effective as communications with hearing individuals. As often happens after these types of decisions this case settled. But it gives us some good guidance for law enforcement moving forward.

We are going to move on to slide 23 and wrap up your law enforcement section of an in-depth review of a comprehensive settlement agreement from the Department of Justice. And those who have heard my presentations before I really like to look at Department of Justice settlement agreements and lots of different settlement agreements to help us come up with, you know, some real practical strategies to implement some of these legal processes. Because we can kind of learn the legal lessons from cases but often the cases don't give us the real roadmap about how to implement some of these legal processes. And so the Department of Justice's agreement with the city of Philadelphia police department I think outlines comprehensively on certain things that police departments can do to ensure effective communication. So this -- we are going to start by looking at what the agreement said in terms of this exigent circumstance. It requires the Philadelphia police department to ensure it is providing effective communication to the extent that it can. It says if there is an emergency involving an imminent threat to the safety or welfare of an individual, including law enforcement and including members of the public, and there is not enough time to make available appropriate auxiliary aids or services, then law enforcement personnel can use whatever auxiliary aids and services are most effective under the circumstances to communicate consistently with appropriate law enforcement response to that imminent threat.

Okay. So let's break that down a little bit more. Moving on to slide 24. What that means if you have these exigent circumstances officers don't need to completely stop and secure

that very specific auxiliary aid and service being requested. So like the Bircoll case. The officer didn't need to stop the interaction all together and wait for the oral interpreter to arrive. But that doesn't mean the ADA doesn't apply. It doesn't mean you can totally throw up your hands and say there is no effective communication we can provide. We have to do the most effective thing under the circumstances. So even in those situations, we got to look at the most effective thing.

So the example given in this settlement agreement is maybe you can't wait for the ASL interpreter. Use pen and paper. That's not the ideal situation. That's not what you are going to do under normal circumstances.

But then this other point is really important, too. And that is as soon as there is no longer this imminent threat, no longer this exigent circumstance, officers have to go through procedures to assess someone's communication need and provide the auxiliary aid and services to ensure effective communication.

On slide 24 I have a link to the DOJ agreement with another police department, the Columbia police department in 2017. I think this is kind of a good starting point for law enforcement to look at when developing your own policies.

Moving on to slide 25, we are going to look a little bit more at some of the Philadelphia settlement agreement because there are some other great tips that we can learn from. So what happened in the DOJ agreement in addition to discussing the exigent circumstances they created a whole process to engage in communication assessment. And one thing that is going -- that that's required is that personnel are going to use what's called a communication card. And it is something that can be used during routine interactions when there is no imminent threat and this communication card uses pictograms to communicate some basic

information and to ask someone about their preferred method of communication.

So skip ahead to slide 26 and I have got two pictures here about what these communication cards look like. So the one on the left has a number of different images that show kind of standard violations. And so there is a -- there is an image of a stop sign. That could be used to communicate that the person ran a stop sign. There is pictures of reckless driving, broken tail light, of somebody's license. And then on the right there is an image that says the best way to communicate with me is and there is images of a sign language interpreter, of captioning, of writing, of lipreading, of something that says I cannot lip read and something that says assistive listening device. These cards can help during routine interactions.

Black to slide 25 for a second. The other important point I like from this Philadelphia settlement agreement, the communication is going to be more complex and that's initial communication. And during those communications it is important to make sure we are providing the appropriate auxiliary aids and services. So this communication assessment form asks the individual what auxiliary aids and services are desired and it specifically lists the different possibilities. It will say interpreter, but instead of saying interpreter it will say American Sign Language interpreter, oral interpreter and signed English interpreter. And it clarifies these will be provided free of charge.

Okay. Moving on to slide 27, other parts of this DOJ settlement agreement, the Philadelphia police department agrees to give primary consideration to express preference. Require the police department to ensure appropriate auxiliary aids and services including interpreters. And ensures that interpreters are provided as soon as possible and they say within typical business regular

business hours. They are shooting for within an hour of the identified need. The agreement recognizes that perhaps during the weekend, holidays or nighttime hours it might be a little bit more than, but it still needs to be provided within a reasonable period of time.

So for law enforcement out there that interpreter is not going to show up within an hour if you call them to the very first time when you need them. What you are going to need to do is maintain a contract with a qualified interpreter agency or hire individuals who are available on that priority basis. It requires Philadelphia to update the detainee database. Also, of course, develop a training program and there are some specific requirements here about what type of training both in terms of format and in terms of topic. And there was a monetary payment of almost \$100,000 in this agreement.

Okay. Moving on and switching gears to the ADA in the correctional facilities and we are now on slide 29. And we will talk about a number of interesting and recent cases and settlements. Looking at effective communication in correctional settings, and the first lesson we have here is that when we are providing effective communication it is important to consider both individually requested needs and systemic changes. And we'll see kind of what that means and how that is applied in a couple of our upcoming cases and settlements. So the first case is a disability rights, Florida versus Jones and this is a lawsuit that was brought about -- it is all sorts of disabilities, both mobility disabilities, people who are deaf and hard-of-hearing and who are blind and have low vision. Given that we don't have a lot of other cases about, we are going to focus on that aspect of this settlement agreement. So this case settled and as part of a settlement there are number of both systemic changes that are going to be made to the Florida

Department of Corrections and processes in place so that individuals can make individual requests.

So just as a couple of examples of how we are going to be providing effective communication, one is that materials that are being distributed, things like orientation materials, handbook, signed paper forms, all of those things are -- have to be -- have to be provided in an accessible format. Also a discussion about how do people who are blind or have low vision know if things are happening kind of throughout the correctional setting. And so one agreement is -- one part of this agreement is that talking watches are going to be given to remind inmates about necessary events or appointments in certain circumstances. Individuals are also going to be provided -- permitted to have plastic magnifying sheets as an accommodation. Something that is not allowed but necessary for a lot of people to have effective communication. The law -- the library and the law library are going to have additional auxiliary aids and services, things like magnifiers, CCT video magnifier, large print books and other resources.

Moving on to slide 30. And here we see some of the more systemic changes. Kind of equipment acquisition. So this -- so this settlement requires the Department of Corrections that if they have a library, if their library has a computer, then the computer is going to have font enlargement and screen magnifiers. And one computer in the law library will have JAWS software and training on that software is going to be available. You see how sometimes providing this type of systemic change in the acquisition of different technology is the way that they are going to provide effective communication. Also upon request and need there is going to be a tape recorder to allow inmates to dictate correspondence and access to inmate assistance or law clerks to help people prepare grievances.

And another reference on the slide to this case is Wells versus Thaler. There was a blind inmate in Texas who requested screen reading software and also Braille and audio versions of different legal resources. Instead of providing those he was given an inmate of his choosing to help him. Ultimately in this particular case the court found for the Department of Corrections and the reason why is that they said they tried to get Braille and audio versions of some of these resources and they were not available. And they found this inmate was able to obtain the other information through this kind of inmate helper. And I bring this up because, you know, I just want to caution correctional facilities who are doing this from overly relying on individuals to provide the types of auxiliary aids and services when there could be technology or other things to enable an inmate to be able to be independent. And there has been some cases out there talking about how as a legal matter if there is a device that would enable somebody to be independent or do something independently that's going to be preferable because it enables somebody's independence which is important even in a correctional setting.

And then, of course, the practical matter, sometimes when we rely on other individuals, even when we rely on a correctional officer, there could be just -- there could be problems with implementation. Kind of giving this additional responsibility is not always the most effective way to implement some of these requirements.

Moving on to slide 31, we are going to look at a number of different cases about prisoners who are deaf and hard-of-hearing because again that's been where most of the litigation has been. And we see some common themes in the case law. And we will kind of go through all of these different themes, but the first lesson I want to share is how do we decide when to provide American Sign Language interpreters. We have individuals who are housed there

24 hours a day seven days a week. And they need to communicate during that entire time. So do we need to provide a sign language interpreter all the time or what do we need to do.

Kind of the shortcut there has been this concept coined in both the case law and settlement agreements called high stakes interactions. And courts and settlement agreements are saying maybe we can kind of use this as a shortcut to say individuals who are deaf who communicate with sign language should be provided with ASL interpreters for all high stakes interactions. And the first -- one of the times that we see this is the McBride case, McBride versus the Michigan Department of Corrections. Talked about all sorts of things that were happening in the correctional setting, but one of the interesting things about this case is that the court actually found that they found for the class on a number of different -- three different things.

So No. 1 as they said that the Michigan Department of Corrections violated the ADA by failing to provide American Sign Language interpreters. And moving on to slide 32, so the court actually ordered that the Department of Corrections had to provide American Sign Language interpreters for all high stakes interactions. Not a settlement but a court order. So it was pretty important. And the court also said that that applied even for religious services, even though the religious services were voluntary programs and run by voluntary organizations. That they were still important programs that needed to have ASL interpreters. So I mention that this is an issue that I have been working on.

So the next case on slide 32, Holmes versus Baldwin and it is a case brought by my organization. And we settled it seven months ago. And we also, you know, had an issue about when we are going to have American Sign Language interpreters being provided

for our class members whose primary language is ASL. And we also adopted this concept of high stakes interactions.

So moving to slide 33. So what are high stakes interactions? Well, high stakes interactions are essentially -- they are complex important communications where the consequences of missing these communications are really serious repercussions. And so the Holmes settlement has a list of the different sorts of interactions or things like medical care, including dental, vision, audiological, therapy and group counseling sessions and a narrow exception that we see from the Department of Justice's guidance about routine appointments, like allergy shots but most medical care will fall within high stakes interactions. Educational program, vocational programs, transferring classification and meetings with the ADA coordinator to implement a communication plan. And I encourage correctional settings that are out there to kind of use this high stakes interactions concept. I mean it is not going to be 100% all you need to do. There is still individual inquiries that need to be made, but it is a nice presumption to assume that somebody uses ASL they are going to probably need an ASL interpreter for these types of interactions.

Okay. Moving on to slide 34. The next lesson is pretty straightforward. And this lesson is that correctional facilities need to be providing video phones to ensure equivalent access for individuals who are deaf. Correctional settings we are seeing throughout the case law and throughout kind of recent settlements is that correctional facilities are overly relying on TTYs but there is a number of reasons that TTYs can't be providing equal access. One is that TTYs really require someone to be able to speak English and a lot of folks who are deaf aren't fluent in English and are kind of a burdensome technology. They take a really long time to communicate back and forth. And for that reason they are

becoming pretty outdated. We still see them all the time in correctional settings. What we see in recent cases the courts ordering the provision and settlement requiring these video phones. And so that McBride case out of Michigan another one of the court's decisions was that the Michigan Department of Corrections was violating the ADA because it wasn't providing video phones and the video phones have to be available for all deaf and hard-of-hearing inmates. The court also said that, you know, the defendant's own witness compared using a TTY to sending someone a fax to their home versus an e-mail to communicate, which was a good analogy of difficulty of using TTY. Correctional settings often use the defense of safety. And I guess another lesson that I would like to say is that safety is absolutely a critical component of any sort of criminal justice setting. And it is certainly something that is -- that should be thought about. But we are seeing this overreliance. And so I would caution covered entities out there instead of just kind of deferring to a safety concern thinking through what is a safety concern and how do we address. A lot of concerns about using video phones, how do we monitor it. But courts have really pointed out that TTYs are monitored by correctional staff. And there could be ways to monitor video phone communications in exactly the same way. Perhaps you just need someone to help interpret some of the sign language, but it is not necessarily a reason to completely except it.

So both the McBride case and the Holmes settlement are requiring the use of video phones. Slide 35, I have a number of other cases where we talk about video phones. And the Heyer case, instead of bringing this case under the ADA there was a question about whether the failure to provide access to the video phone actually restricted an inmate's constitutional rights or First Amendment rights. And we see the same sort of arguments about why TTYs

are outdated technology and concerns about security that the court says here are an exaggerated response. If there is resolutions about how to mitigate that concern.

Moving on to slide 36, another issue that we see is that information is constantly being communicated to inmates. So we need to think through how the information is being communicated and how are they receiving notifications and are those notifications accessible. So we mentioned earlier with respect to the Florida case that there were talking watches for blind inmates. Well, we see in the next -- in this Bearden case on slide 36 that there are also issues for folks who are deaf and hard-of-hearing. The Bearden case was brought by an individual who was deaf. And he was constantly missing calls to go take his medicine. And the reason why is that this information was being communicated through the jail's alert system which was done over a loud speaker. The court and pretty quick analysis said well, that's not going to be effective for this individual who is missing this information. So we see how that's being implemented on slide 37 both at that Holmes settlement and DOJ agreement with South Carolina, that correctional settings across the country are using tactile and visual alert systems.

Just a couple of tips. If we are using a visual alert system it is important to remember to think through whether an individual actually will be able to see the visual alerts and consider whether the information is being relayed during a nighttime when someone is sleeping and how to get that information communicated that way.

Our last topic and one that is also kind of unique to the criminal justice system we are learning from both the courts and settlement agreements that we need to affirmatively evaluate an individual's disability related needs. We need to be proactive and develop a process to do so. And one of the legal cases that we learn is from

this case called Pierce versus D.C. We have an individual who was incarcerated for 51 days and had requested an interpreter throughout that whole time. And the prison staff really never assessed his needs and assumed that lipreading and written notes were sufficient. The court said it was a violation of -- added as a matter of law by failing to affirmatively evaluate their needs. And they have a duty to assess the accommodation needs of inmates with a known disability. How do we do that? We got kind of two examples. The Holmes settlement creates this entire process of how to kind of enhance the screening process to first assess whether somebody is deaf or hard-of-hearing and then to use these third party communication assessors to assess someone's communication needs and help develop a communication plan. What we are seeing in the disability rights Florida case and settlement they have created a process, there is going to be an evaluation to identify if somebody has as disability and accommodation needs and any verbal or written communication skills will be evaluated by a professional.

So I would encourage folks out there to really think through what type of affirmative processes are in place to evaluate folk's needs.

So a quick recap of the lessons that we learned pretty quickly today. We want to create policies and procedures about how to communicate effectively during both exigent and nonexigent circumstances. We want to do training, training, we want to do training, hands-on when possible. We want to learn from comprehensive DOJ agreements. We want to consider systemic and individual needs. We want to install in these video phones instead of relying on TTY and we want to make sure we are providing ASL interpreters. And we can use that shortcut about high stakes programs. And we want to contract with interpreting agencies to make sure we are getting people on a priority basis and

oral communication in a good way and develop a process. We don't have -- this program is not one where there are questions and answers. But I have my contact information on slide 41, phone number and e-mail. I would be more than happy to discuss these cases or chat with anyone. Feel free to reach out to me.

>> Thank you. Once again lots of great information. And if anyone has any further questions you can contact Rachel. You can also contact us. On slide 42 you will see our contact info. You can contact the ADA National Network by calling 800-949-4232. And you will be directed to your regional ADA center. And the national network website is adata.org. If you are in the MidAtlantic region you can call us directly at 301-217-0124. And you can visit our website at adainfo.org.

Keep in mind session evaluations will be sent out. Keep filling those out and we appreciate you guys giving us feedback. Slide 43, for upcoming webinars and trainings you can take a look at our training section on adainfo.org. And you can take a look at the events section at adata.org.

We thank everyone. And sorry for the technical delays. And Rachel, you handled that well. Thank you everyone for joining us.

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