



COUNTY OF SACRAMENTO ALTERNATE FORMAT POLICY

LEGAL REQUIREMENTS AND RECOMMENDATIONS FOR PROVIDING ALTERNATE FORMATS OF PRINT DOCUMENTS FOR PEOPLE WITH DISABILITIES

REFERENCES: AMERICANS WITH DISABILITIES ACT (ADA) & GOVERNMENT CODE SECTION 11135; Public Records Act (Government Code Section 6250 - 6270); California Department of Rehabilitation Policy

Effective Date: April 8, 2010

Background

Most County departments that administer public programs and provide direct services to the public disseminate program information via printed documents. Further, the County is subject to the California Public Records act which addresses public access to government records. (Government Code sections 6250 – 6270.) Section 6250 articulates a policy of broad disclosure and provides that “access to information concerning the conduct of the people’s business is a fundamental and necessary right of every person in this state.” A “public record” includes any writing containing information relating to the conduct of the public’s business prepared, owned, used or retained in any state or local agency regardless of physical form or characteristics.

Additionally, all County of Sacramento print documents are required to be made available in alternate formats by the provisions of Title II of the Americans with Disabilities Act (1991) US Department of Justice 28 CFR Part 35 Nondiscrimination on the Basis of Disability in State and Local Government Services Final Rule Subpart E—Communications 35.160 General and California Government Code Section 11135 (2002). These laws provide that all public entities must ensure that their programs, activities and services are accessible to persons with disabilities.

One of the most important components of accessibility is ensuring that any communication with persons with disabilities is as effective as communications with others. Having equal and timely access to written information is absolutely critical for print-disabled (those unable to read print materials due to vision, physical or cognitive functional limitations) and non print-disabled people alike. Many people with disabilities, particularly people who are print disabled require alternate formats beyond conventional print so that they can have access to information. Examples of alternate formats include, but are not limited to: large print, audio cassettes, Braille, e-Text, etc.

While most units have responded to individual requests for materials in alternate formats, a formal written policy provides greater assurance of compliance by informing staff in advance about how to respond to these requests for accommodation. To comply with Title II of the ADA and Government Code Section 11135, the Disability Compliance Office strongly recommends all departments to develop a comprehensive policy regarding the provision of their materials in alternate formats.

Developing Your Policy

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

- Reduces staff confusion about the correct course of action and, as a result, lowers costs and improves response time.

- Guarantees that the general public is aware of the alternate formats available for your material.
- Ensures that you budget adequate funds for procuring materials in alternate formats.

Document Planning

Planning for documents in alternate formats should become a routine part of your publication process. To ensure that you respond to requests in a timely manner and provide accurate translations, please keep the following in mind:

- When initially developing documents, your foremost goal should be to communicate the information to requestors effectively. Use language that is clear and concise so that people can easily understand it with little previous experience or background. This will facilitate translation to alternate formats. Be discerning when adding tables, charts and graphics remembering that these are for persons using alternate formats.
- Decide, based on staff resources, which alternate formats to produce in-house and which to outsource. Contract with more than one vendor offering services such as Braille, descriptive video, or captioning. Depending on the size of the Braille document and the vendor's workload, the time frame for delivery of a Braille document ranges from a few days to several months.
- Your department will handle requests for documents in alternate formats. When developing policy, be sure that you involve representatives of appropriate units. Ensure that everybody involved in the production and procurement of materials understands who will produce each document.
- Determine early which publications are most relevant to your program delivery and/or most frequently distributed and thus more likely to be requested in alternate formats. Ensure that copies of those documents are readily available in several formats. It is helpful to keep a log of requests received, as this information may be useful in determining future budget and publication needs.
- Agree on a reasonable time frame to deliver documents not readily available and be sure that staff communicates this to individuals making requests. Include a statement on the availability of the document in alternate formats on all of your publications. Be sure to include the address, telephone number, TTY/TDD number or California Relay Service number (711), and when appropriate, a contact person on all documents.

Suggested Wording:

- Meeting Notices, Agendas, Training Notices, etc: In accordance with the ADA and California Government Code requirements, if you need a disability-related reasonable accommodation/alternate format for this meeting, please contact (name) at (phone, E-mail address, and TTY/TDD number) by (a date at least three business days prior to the event).
- Brochures and Program Material: ALTERNATE FORMATS: In accordance with the ADA and California Government Code requirements, this publication can be made available in Braille, large print, computer disk, or audio cassette recording as a disability-related reasonable accommodation for an individual with a disability.
- Any Other Program Publications: To discuss how to receive a copy of this publication in an alternate format, please contact (name, E-mail address, phone, and TDD number).

Implementing a Variety of Formats

Units need to consider a range of formats for both the production and distribution of information. Effective communication reflects a "mixed media" approach, possibly video representation,

verbal descriptions, audio associated sounds, and interactive databases in addition to the printed word.

A unit must provide an opportunity for individuals with disabilities to request the alternate format of their choice. This expressed choice should be given primary consideration. Encourage staff to engage in an interactive, courteous dialogue with the individuals making the request. Also, ensure that staff members understand they may not place a surcharge on publications produced in alternate format. If a document is available to the public free of charge, the document in an alternate format must also be free of charge. For those documents that are available for a fee, the fee must be the same for the document in an alternate format.

The most commonly requested alternate formats include:

- **Large Print:** a publication using 14 point type or larger. Generating large print documents for individuals who have low vision is a task that most units can accomplish in-house. Simply using a copy machine to enlarge and darken the print; however, is not the best approach. Rather, documents in large print need to be printed from a computer very clearly, reformatted to increase the size of the font, improve print contrast, and generally make the text easier to track visually. A master document in large, dark print may be copied if the machine will produce a very clean duplicate. The large print version will consist of about three pages of large print for every page of 12 point print. Many individuals who are legally blind are able to read large print, so it is reasonable to conclude that there are likely to be more requests for this format. As with other alternate formats, it will be helpful to retain an electronic file of the large print version so that it can be quickly printed, e-mailed, or refined upon request. In order to generate the most legible large print documents, make an effort to implement the following specific suggestions, unless an individual specifies another type-size or font preference:
 - Many large print readers recommend printing text in 18-point type. Although 14-point type is often mentioned as acceptable in regulations, such as those issued by the U.S. Postal Service, using 18-point type will accommodate a wider audience.
 - Select a font that is plain/sans serif (such as Tiresias LPfont, Arial, Avant Garde Demi, Futura Bold, Gills Sans Bold, Helvetica Med, Optima Bold, Universal Bold, Verdana, Trebuchet, or Stone) rather than one that is fancy, with serif, italic, oblique, script, highly decorative, or of other unusual forms (such as Times New Roman). There should be normal white space between characters.
 - Bold the entire document so that the print will be dark enough to offer an additional level of contrast between the print and the paper.
 - Justify the text to the left so that the spacing between letters is consistent and easy to track visually. Use the block style for paragraphs whenever possible. If the beginning of each paragraph must be indented, use two spaces, instead of the usual five.
 - Left and right margins of one inch are ideal.
 - Number pages at the top or bottom left-hand side of the page.
 - Use 8-1/2" by 11", non-glossy, off-white paper whenever possible. White paper can create glare, and colored paper lessens the contrast between the print and paper. Also, choose paper that does not permit the letters to bleed through to the other side of the page when printing on both sides.
 - Do not center text.
 - Do not double-space the document, but rather, set line spacing to 1.5.
 - Areas within the document that are not straight text, such as pictures, tables, graphs, charts, and information in columns, will require some modification. Graphs, diagrams, and pictures may be enlarged and included on separate pages.

Information in tables, columns, and charts needs to be arranged so that it can easily be tracked with the eye. Column formatting should be removed.

- Pages on the World Wide Web must also consider large print options. The use of Cascading Style Sheets allows each user to set the format of pages to his or her own preference.

- **Audio Version:** a publication recorded on tape, audio files on compact disc, and file formats for a computer or the internet. The development of audio recordings creates a highly flexible format which many people with disabilities can easily use.
 1. Tapes: Since many people who are print disabled have become accustomed to listening to recorded texts, this alternate format is certainly one that should be considered. In fact, depending upon the circumstances in which reading will be done, this medium may be the best "one size fits all" choice. Offering an audio-based publication is especially necessary if there is a need to reach the widest range of people who are print disabled readers and may not have access to computers or the Internet. Because they must frequently rely upon cassette-based publications, people who are print disabled are likely to have access to audio cassette players. It is also worth noting that people who have learning disabilities may also benefit from listening to information on tape. Having someone with a clear speaking voice who is very familiar with the material is all you need to create a high-quality audiotape. Unit staff can often meet these requirements, although the time required may take them away from other duties.
 2. Audio Files on Compact Disc: The cost of equipment and supplies related to audio taping has dropped greatly in the past several years. Compact discs (CDs) generally hold about 70 minutes of audio data. They can either be played on home stereo equipment, or they can be played on computers. They are likely to become increasingly popular as audio tape technology is phased out. It may also be easier to disseminate a CD as an insert into a package, or into the back of a print book, to enable each user to choose a preferred reading medium.
 3. File Formats for a Computer or the Internet: When the audio version of the text will be included on a web page, it is generally a good idea to use some form of streaming media. Users with dial-up connections can often listen to these files. Generally, only the most technologically equipped users have connections fast enough to allow them to conveniently download and save a file created in a format like MP3. Files can, however, be copied onto CDs for distribution. You are encouraged to ensure access by including a player for the files on each CD to ensure compatibility. One of the benefits of using a multimedia audio format, like MP3, is that such audio files can be merged with a document produced in the Extensible Markup Language (XML) to allow for simultaneous text and audio access.

- **Video Tape:** a publication recorded on video tape, a relatively wide magnetic tape for use in recording visual images and associated sounds. Informational or training video tapes should be closed caption encoded, and have narrative descriptions. Video projection equipment should have the capability of displaying closed captioning and presenting audible narrative description. You usually contract for these services outside your unit.
 1. Closed captions: a text version of the spoken part of a television, movie, video, or computer presentation that makes it accessible to persons who are deaf or hearing impaired.
 2. Narrative descriptions: making television, movie, video, or computer presentations accessible to people who are blind or visually impaired by providing descriptive narration of key visual elements in programs. What to describe should be key visual elements in a program that a viewer who is visually impaired would ordinarily miss. Actions, costumes,

gestures and scene changes are just a few of the elements that, when described, engage the print disabled viewer with the story.

- **Braille:** a system of raised-dot combinations that represent print letters both to blind and some print disabled readers. Though the population of Braille readers may be comparatively small, it is important that this format be offered to those who need it. If a Braille reader is attending a meeting where printed documents are being reviewed, and the print disabled individual has nothing to review, he or she cannot participate fully in the activity.

To produce material in Braille format, you usually contract for the service outside your unit. Costs for this service vary, however, and vendors usually charge for the original production of a page, as well as for each reproduced page. If a unit intends to produce Braille texts in-house, they must have a staff person who is trained in the production of Braille, purchase a Braille embosser, the appropriate paper, and software to translate electronic files into Braille. While an electronic file can be translated into Braille and embossed on paper, if the document is complex, a proofreader's assistance will be valuable. A proofreader can assure that Braille readers receive error-free documents.

- **Diskette:** a method of saving information from a computer onto a disk in a format usable with assistive technology such as screen readers e.g. jaws etc. Costs of producing information on diskettes are inexpensive compared to many other formats. CD ROMS can hold much more information, and are continuing to replace diskettes.
- **Internet/World Wide Web:** is a computer-based "network of networks" that allows information to be shared electronically. The medium offers access to anyone with a computer and a modem; however, people with print disabilities need special consideration to ensure that web-based materials are accessible. It is recommended that Webmasters provide HTML, Word, or other alternate versions of all documents posted in PDF format because most PDF formats are not accessible. Department web masters should adhere to all aspects of the County's Web Accessibility Policy including the provision to post alternate formats of documents posted in PDF.
- **E-Mail Attachments:** E-Mail messages with attachments should provide the attachments in different, alternate formats; e.g. Word or text, especially if the E-Mail is sent to a large number of addressees.

Standard Correspondence Font and Size

It is recommended that a font without serifs be used (Arial, Tahoma, and Universal) at a size no smaller than 12 points for all general correspondence.

Quantities

Deciding how many copies of each format to produce will depend, to some extent, upon whether the work is being done in-house or whether a contract is being established to have it done. For example, printing material in large print on demand is not difficult. Copying an accessible file onto a diskette or compact disc and then duplicating that product is increasingly easy to do and relatively inexpensive. Certainly, presenting a document online is one of the easiest ways to make copies available at no cost. But deciding how many copies to produce in large print, in Braille, audio cassette recording or compact disc requires guesswork and some trial and error.

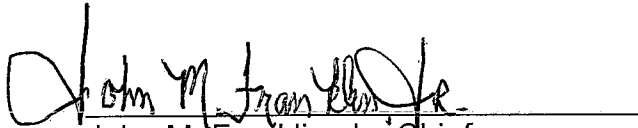
One strategy, which may be useful for distributing Braille, would be to have a few copies produced. Afterwards, keep an electronic copy of the master Braille file. An electronic Braille file is basically just like any other computer file, except that it has an unfamiliar three-letter extension, and it looks rather strange if opened by a typical word processor. A contractor can easily generate additional paper copies from the electronic file upon request. Updating information that changes frequently, such as the text of a menu, entertainment program, brochure, etc., is important and appreciated by print disabled individuals.

Also, if your unit contracts to have alternate format production needs met, the companies with which you choose to work can often advise you about the quantities needed. It is recommended that your unit contract with a vendor who has previously produced documents with a similar purpose and audience.

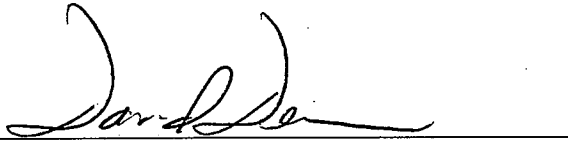
Budget for Alternate Format Conversion

A well-developed plan will identify funds needed for production of alternate formats. In the meantime, units need to be prepared to identify resources to cover the costs of providing requested alternate format materials from existing resources.

For further information or technical assistance on the production of alternate formats, or for a list of resources for the provision of materials, please contact the Disability Compliance Office at 874-7642 (voice), 874-7647 (TTY/TDD) or via email at franklinj@saccounty.net.



John M. Franklin, Jr., Chief
Disability Compliance Program



David Devine, Director
Department of Personnel Services