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# Emergency Coordination Center (ECC) Effective Communication Guidance

*Produced by the City of Portland's ECC Aging & Disability Team*

**May 2020**

## Defining Effective Communication

“Effective communication” is a legal standard and responsibility required by Title II of the Americans with Disabilities Act (ADA), as amended.<sup>1</sup> In practical terms, it means that a person with a disability should be able to share and receive information from the City of Portland as effectively as a person who doesn't have a disability. There should not be barriers that hinder or prevent communication between disability communities and the City, such as inaccessible content, inability to request alternate formats, or asking an employee or member(s) of the public with a disability to pay for making materials accessible.

Similarly, the City of Portland must also comply with Title I of the ADA, which protects equitable access for employees with disabilities. Since 2012, the City has publicly committed to being a Model Employer for people with disabilities, in which the City strives to provide the best possible level of access available for employees, including those currently working in the City's Emergency Coordination Center (ECC) or the Joint Information Center (JIC).

During a state of emergency, it is especially critical that the City of Portland prioritizes proactive access to emergency information for historically marginalized communities, including people with disabilities. Emergencies do not decrease the City's responsibility to support access; the U.S. Federal Emergency Management Agency (FEMA) affirmed in an April 2020 document that “civil rights laws and legal authorities remain in effect, and cannot be waived, during emergencies.”<sup>2</sup> Any vital information produced by the City, ECC, or JIC for either City employees or for the public should integrate best accessibility practices in order to fulfill both the City's legal obligations and equity commitments to people with disabilities.

<sup>1</sup> Specific regulations are available in the Code of Federal Regulations at [28.CFR.35.160-164](#)

<sup>2</sup> FEMA Civil Rights Bulletin. [Ensuring Civil Rights During the COVID-19 Response](#) (April 9, 2020).



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## Criteria for Identifying Vital Information

Similar to the criteria outlined in the Office of Equity and Human Rights' (OEHR) *Language Access Guidance*,<sup>3</sup> City of Portland bureaus and ECC staff are encouraged to evaluate each message to determine if it is vital. While Portland is required to make all public facing content accessible to people with disabilities, it may not be possible to proactively make every document accessible during a state of emergency. However, all vital information should be prioritized and made proactively accessible.

Information that has **safety, health, legal, or financial implications** should be classified as vital. Public communications on COVID-19 from City Council and members of City Council are automatically classified as vital. Examples of each type are provided below.

If in doubt whether information should be classified as vital, please contact Anais Keenon or Jonathan Simeone on the ECC's Aging and Disability team for guidance. Their contact information is provided at the end of this document.

<i>Message Content</i>	<i>Examples</i>
<i>Safety implications</i>	Availability of protective personal equipment (PPE); location of shelters
<i>Health implications</i>	News about symptoms or spread of COVID-19; locations of emergency testing centers
<i>Legal implications</i>	Rent moratorium; information about utility bills and service
<i>Financial implications</i>	City Council ordinances that allocate emergency funding to local businesses or tenants; applications for funding
<i>City Council public communications</i>	Press briefings on the City's response to COVID-19

## Proactive Accessibility Standards

The following checklist offers City, ECC and JIC staff a quick way to confirm that the basic elements of accessibility are present, depending on how the message will be distributed. Vital messages should be accessible for people with visual, hearing, speech, cognitive, and/or learning disabilities.

<sup>3</sup> City of Portland's Office of Equity and Human Rights (OEHR). *Language Access Guidance for the Joint Information Center COVID-19 Response* (2020).



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**Important note:** A member of the public or an employee could request an alternate format that is not listed in the checklist below, such as braille. The City should still consider, and provide if possible, the alternate format requested by an individual. Either way, the City is legally required to effectively communicate with a person with a disability.

To use the checklist, start first with the “General” section, then move to the applicable section(s) based on the document type being created.

### General

- The message is available in both an audio and a visual (written) format
- The message is in plain language
  - Sentences and paragraphs are short and clear
  - Words are common and easy to understand
  - Acronyms and jargon have been avoided to the extent possible; if acronyms must be used, write the full name out the first time and use the acronym thereafter
  - An active voice is used instead of a passive voice
  - Resource: [Office of Community & Civic Life’s Plain Language Access Tip](#)
  - Resource: [Federal Plain Language Guidelines](#)
- The City’s [meaningful access statement](#) has been included with the message and/or contact information is provided and is easy to find for a person who wants to request an alternate format

### Websites

- Sans serif font (e.g. Arial, Helvetica, Verdana) in size 11pt or larger is used
- Headings are used and are in the right order (H1, H2, H3, etc.)
- Alternative text is provided for all images or graphics
- Hyperlinks are labeled
  - All examples below go to the City of Portland’s homepage
  - Example of labeled hyperlink: [City of Portland](#)
  - Example of non-labeled hyperlinks: [click here](#), [read more](#), [link](#)
    - If you must use “click here” or “read more”, be specific
      - Example: “Read more about COVID safety measures”
      - Example: “Click here to read the Mayor’s proposed budget”
- Colors meet contrast requirements
  - Resource: [WebAIM Color Contrast Checker](#)
- If Tableau or another data visualization platform is used on the website, there is a link at the top of the webpage to an accessible PDF that summarizes important data and findings



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## Social Media

- Hashtags are placed at the end of a post, not at the beginning
- The first letter of each word in a hashtag is capitalized, e.g. #WeArePortland
- Links have been shortened using a URL-shortener such as Bitly
- Colors meet contrast requirements, especially for graphics or infographics
  - Resource: [WebAIM Color Contrast Checker](#)
- If external content is linked, let users know you do not control that content (can be as simple as crediting the organization that made the external content)
  - When possible, link to external content that is already accessible
- Captions are provided for all City-made videos
  - Do not rely on automatic captions alone; errors are common!
  - You may need to fix erroneous captions by hand
  - Resource: [YouTube Translate & Captions Help Page](#)
  - Resource: [Vimeo Captions & Subtitles](#)
  - Resource: [CADET captioning software](#)
- Transcripts are included with all City-made podcasts
  - Example: [Portland Police Bureau's NewsBeat Podcast](#)
- Audio description is provided for City-made videos
  - Resource: [What is Audio Description?](#)
  - Resource: [Beginner's Guide to Audio Description](#) (3PlayMedia)
  - Resource: [YouDescribe](#) (best in Chrome or Firefox) & [YouDescribe FAQ](#)
- Site-specific accessibility resources:
  - [Facebook](#)
  - [Twitter](#)
  - [Instagram](#)
  - [Google](#)

## Microsoft Word Documents

- Sans serif font (e.g. Arial, Helvetica, Verdana) in size 11pt or larger is used
- Headings are used and are in the right order (H1, H2, H3, etc.)
- Tables are simple and do not use “split cells” or “merged cells”
- Tables are not used for formatting
- Alternative text is provided for all images, graphics, graphs, and charts
- Information is not communicated only through changes in color and/or formatting (e.g. “read text in bold” or “read text in orange”)
- Hyperlinks are labeled
  - All examples below go to the City of Portland's homepage
  - Example of labeled hyperlink: [City of Portland](#)
  - Example of non-labeled hyperlinks: [click here](#), [read more](#), [link](#)



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- If you must use “click here” or “read more”, be specific
  - Example: “Read more about COVID safety measures”
  - Example: “Click here to read the Mayor’s proposed budget”
- ❑ Colors meet contrast requirements
  - Resource: [WebAIM Color Contrast Checker](#)

## PDF Documents

*Tip: Adobe Pro (not Adobe Reader) is required in order to make PDFs fully accessible.*

- ❑ Sans serif font (e.g. Arial, Helvetica, Verdana) in size 11pt or larger is used
- ❑ Headings are used and are in the right order (H1, H2, H3, etc.)
- ❑ There is a logical reading order
- ❑ Tables are simple and do not use “split cells” or “merged cells”
- ❑ Tables are not used for formatting
- ❑ Alternative text is included for all images, graphics, graphs, and charts
- ❑ Information is not communicated only through changes in color and/or formatting (e.g. “read text in bold” or “read text in orange”)
- ❑ Hyperlinks are labeled
  - All examples below go to the City of Portland’s homepage
  - Example of labeled hyperlink: [City of Portland](#)
  - Example of non-labeled hyperlinks: [click here](#), [read more](#), [link](#)
    - If you must use “click here” or “read more”, be specific
      - Example: “Read more about COVID safety measures”
      - Example: “Click here to read the Mayor’s proposed budget”
- ❑ Colors meet contrast requirements
  - Resource: [WebAIM Color Contrast Checker](#)

## PDF Forms

*In addition to all standards under the “PDF Documents” section:*

- ❑ Form fields are appropriately named
- ❑ Tool Tips are provided for all form fields
  - Example: “Use the dropdown calendar to select today’s date” or “Type your first and last name”

## Live Press Briefings, Conferences, Town Halls

- ❑ American Sign Language (ASL) interpreter is provided
  - Preferable for the interpreter to be a Certified Deaf Interpreter (CDI)
  - Interpreter was prepared beforehand



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- They were given the names, agencies, and titles of all presenters
- They were given printed speech notes or comments if available
- They were given an overview of the message before interpreting
- Interpreter is framed so that their upper body and face is shown on video
- Interpreter is visible in-person and on-camera at all times
- Interpreter is well-lit with front or side lighting (no backlighting)
- If virtual, interpreter appears in a side-by-side video with the speaker
- ☐ Live captioning (Communication Access in Real-Time, or CART) is provided

### *In-Person Communication*

- ☐ Communication boards are available for use, preferably laminated
  - Example: [Communication board](#) (PowerPoint)
- ☐ American Sign Language (ASL) interpreter is available upon request, either in-person (preferable) or through Virtual Remote Interpreting (VRI)
- ☐ Live captioning (also known as Communication Access in Real Time, or CART) is available upon request
- ☐ Staff know how to:
  - Quickly arrange ASL interpretation or live captioning
  - Confidentially assist people with visual, cognitive, or learning disabilities in completing forms and paperwork
  - Communicate with people under stress

## Vendors

The City of Portland maintains [a list of vendors](#) that provide accessibility- and ADA-related services. Note that this resource is only a starting point; it is possible to work with vendors that are not currently listed on the document.

## Contact Information

**Anais Keenon** (she/her), Disability Resources & Employment Specialist, Bureau of Human Resources. Email: [Anais.keenon@portlandoregon.gov](mailto:Anais.keenon@portlandoregon.gov)

**Jonathan Simeone** (he/him), ADA Title II Policy Coordinator, Office of Equity and Human Rights. Email: [Jonathan.simeone@portlandoregon.gov](mailto:Jonathan.simeone@portlandoregon.gov)