
AMERICAN DISABILITIES ACT, TITLE II

Policy Manual

AGING AND DISABILITY SERVICES
DIVISION

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
AGING AND DISABILITY SERVICES DIVISION
ADMINISTRATIVE POLICY MANUAL**

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200 INTRODUCTION

Title II of the Americans with Disabilities Act of 1990 (ADA) prohibits discrimination against qualified individuals with disabilities in all programs, activities, and services of public entities. The Aging and Disability Services Division (ADSD) recognizes the importance of establishing this process to meet the requirements of the ADA, as amended by the Americans with Disabilities Act Amendments of 2008 and Section 504 of the Rehabilitation Act of 1973.

200.1 GENERAL PROVISIONS

Directly or through contractual or other arrangements, ADSD is committed to providing a safe, flexible, and respectful environment free from all forms of discrimination ensuring people with disabilities can take part in, and benefit from the programs, services, and activities offered by the division. Every reasonable effort will be made to address and resolve access requests and grievances, while protecting the rights and confidentiality of all ADSD service recipients.

ADSD program leadership is responsible for ensuring compliance with program eligibility and service provisions, reasonable accommodation implementation, employee oversight, state laws, federal regulations, and department and division policies and procedures. Program leadership works collaboratively with the ADA Coordinator(s), ADA Training Officer, and ADSD Human Resources (HR).

Employees and contractors will receive orientation on this policy and complete the required ADA training within 30 calendar days of hire and scheduled refresher training as directed.

Any State of Nevada Purchasing contracts and/or ADSD subawards include specific language delineating the contractor/subaward requirement for ADA policies, grievance process, and facility accessibility.

205 REASONABLE ACCOMMODATIONS

ADSD will provide appropriate aids and services, meeting reasonable accommodations, for individuals with qualifying disabilities to ensure they can participate equally in ADSD programs, services, and activities.

The ADA does not require ADSD to take any action that would fundamentally alter the nature of their programs, services or activities, or that would impose an undue financial or administrative burden. If an accommodation request is determined to be unreasonable, ADSD must work with the individual to provide another effective aid or service (when possible).

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205.1 REQUEST FOR REASONABLE ACCOMMODATION

ADSD program applicants, participants, and board/committee members who require an accommodation may make a request for an ADA accommodation to the ADSD program in writing or via the [ADSD ADA Inquiry Form](#) located on the ADSD webpage at [ADSD.nv.gov](#). ADSD program staff may provide individuals with assistance in completing any forms or documenting accommodation requests.

To acquire necessary aids or services, ADSD requires reasonable advance notice, based on the time needed to arrange the requested accommodations (e.g., scheduling interpreters). Requests must be submitted no less than two (2) business days before a scheduled event or meeting. While ADSD will make every effort to fulfill requests within this timeframe, it cannot guarantee availability in all circumstances.

205.2 PROCESSING A REQUEST FOR REASONABLE ACCOMMODATION

Employees of ADSD are responsible for processing reasonable accommodation requests from individuals receiving services, including both the implementation and documentation of such accommodations. All ADA accommodation requests will be reviewed through an interactive process between the requestor and ADSD.

ADA accommodation requests will be resolved at the lowest level, starting with program staff. If program staff have questions regarding whether an accommodation is considered “reasonable” under ADA Title II, program staff will work collaboratively with their leadership to resolve the request. If further guidance is needed, program leadership will consult the Lead ADA Coordinator for technical assistance and support.

ADSD program staff and/or leadership will respond to an accommodation request, within 5 business days, in writing via an ADA Accommodation Determination Form (ADA-GR-01) or using any communication mode appropriate as an accommodation (e.g., braille, sign language, etc.). The response will include information on whether or not the accommodation was approved as requested, in part, or an alternate accommodation has been identified. To protect the requestor’s privacy, all communications will only be released to the requestor and a legal representative, such as a Power of Attorney, Legal Guardian(s), and/or those authorized by a signed Release of Information (CI-ROI-01). All ADA accommodations will be documented by the program in the individual case file.

A request may be denied if it results in a direct threat to the health or safety of the requestor or others, is deemed unreasonable (e.g., alters program or financial burden) or does not fall under ADA Title II. Case-specific considerations, such as the timeliness of a request, may also result in the requested accommodation being delayed or denied.

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210 COMMUNICATION AUXILIARY AIDS AND SERVICES

ADSD will provide timely, equal access to auxiliary aids and communication services to facilitate effective communication based on the need of the individual.

The type of auxiliary aid or service depends on the length and complexity of the communication as well as the format (e.g., number of individuals involved, meetings, hearings, interviews, service appointments, court proceedings, etc.).

In addition, the individual's chosen method(s) of communication are key (e.g., sign language interpreters are effective only for those who use sign language). Other methods of communication, such as captioning may be needed for individuals who have lost their hearing and do not use sign language. Some individuals who are deaf, deafblind, or hard of hearing may access more than one accommodation at a time (e.g., sign language interpreter and Communication Access Realtime Translator [CART]).

210.1 ASSISTIVE TECHNOLOGY AND TELECOMMUNICATIONS EQUIPMENT

Assistive technology and telecommunications equipment includes distribution and training to assist individuals with communication disabilities. Equipment and services (not all inclusive):

- Assistive listening systems and devices
- Audio recordings or qualified readers
- Braille or large print
- Hearing aid-compatible phones
- Open and closed captioning
- Relay services (Internal Protocol, CAPTEL, or Video)
- Screen reader or magnification software
- Speech-to-speech transliterator
- Telephone handset amplifiers
- Text telephone (TTY)
- Video text displays

210.2 COMMUNICATION ACCESS REALTIME TRANSLATION SERVICES

CART service is provided by a qualified and registered provider that translates spoken language (English) into written text in real time. CART can be used in any situation, but most often used in group settings (public meetings, hearings, etc.) where captioning

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verbatim communication is critical. In addition, CART supports communication access for individuals who may otherwise not use sign language.

210.3 SIGN LANGUAGE INTERPRETERS

Sign language interpreting is provided by qualified and registered providers (that interpret (receptively and expressively) spoken language into signed or manual language effectively, accurately, and impartially using specialized vocabulary.

210.4 VIDEO REMOTE INTERPRETING OR VIDEO INTERPRETING SERVICES

Video Remote Interpreting (VRI) or Video Interpreting Services (VIS) provides remote access to off-site qualified sign language interpreters as a method to provide effective access to interpreting services. VRI/VIS can be used in a variety of settings and situations (e.g., virtual meetings, rural access, medical appointments, emergencies).

When VRI/VIS is used, the following required performance standards should 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 individual using sign language, regardless of body position.
- A clear, audible transmission of voices.
- On-site interpreter services may still be required in those situations where the use of Video Relay Services (VRS) or VRI is otherwise not feasible or does not result in effective communication.

215 SCHEDULING CART OR SIGN LANGUAGE INTERPRETERS

ADSD will schedule CART and/or sign language interpreters through the State's Master Service Agreement (Purchasing.nv.gov), providing as much advanced notice as possible. When scheduling CART, sign language interpreters, or VRI/VIS, the following information will be needed:

- Date, start, and end time of the event.
- Event title and description of the event (e.g., staff training, client intake meeting, board/commission meeting). Include as much information about the event as possible.

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- Event location to include the address and meeting room number for in-person events. If the event is remote, include the platform used (e.g., Zoom, Microsoft Teams) and a link to the event including any access code.
- Consumer's preferred list of CART providers and/or sign language interpreters (if available). For events with multiple consumers, considerations need to be made to ensure access for all participants.
- Schedule two (2) sign language interpreters for meetings more than one (1) hour in length, or for meetings with complex/sensitive topics, multiple presenters, or presentations that contain a lot of program jargon, etc.
- Schedule interpreters to begin 15 minutes prior to the event start time. This will allow for proper set up and addressing technical issues.
- Provide a copy of all materials (e.g., handouts, power point presentations, agenda, etc.) in advance of the event to ensure the CART provider dictionary is up to date for proper captioning and sign language interpreters adequately prepared.

220 COMMUNICATION BEST PRACTICES

ADSD shall apply best practices to promote effective communication when using CART, sign language interpreters, or VRI/VIS.

The role of the CART provider and sign language interpreter is to convey communication between the individuals; they are not part of the conversation. When communicating with the individual, look and talk directly to the individual and not the provider. Speak in the first person and avoid such phrases as "tell them" or "explain to them". Turn taking is encouraged. The sign language interpreter can only interpret for one person at a time. Avoid talking over people or having side conversations. In addition, speak in a normal tone and normal pace. The CART provider/sign language interpreter will ask the speaker to pause, slow down, or repeat when needed.

For non-verbal cues and clear visibility of signing, the CART provider/sign language interpreter should position themselves next to the speaker, so the individual has both the speaker and CART provider/sign language interpreter in their line of sight. Backgrounds (screens or walls) should provide contrast and be solid, and lighting should be adjusted for good visibility.

Be mindful of the platform (e.g., Zoom, Microsoft Teams, etc.) limitations or features that support accessibility. The event host (or proxy) must also join 15 minutes prior to the start of the meeting to trouble shoot any technical issues. Sign language interpreters should rename their title on the screen to include "ASL interpreter, First Name." This will allow participants to easily locate the interpreter and "pin" them on screen. At the start of the meeting take a few minutes to go over the tools and functions for pinning, captioning, etc. Speakers should have their camera on and state their name to support

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participants with identifying the speaker and picking up non-verbal cues. When screen sharing, ensure the interpreters are positioned to remain on screen and in a large enough window where all signs can be cleanly viewed.

225 DOCUMENT AND WEBSITE REQUIREMENTS

ADSD will ensure its website is accessible in accordance with current federal requirements and recognize that people differ in how they access website information.

ADSD program documents must be developed following plain language and accessibility standards from the Nevada Office of the Chief Information Officer, Policy 101 ADA Technology Accessibility Guidelines found on ADA.nv.gov.

All advertising of ADSD sponsored public meetings or events must include an accessibility statement for accommodation requests. This statement must provide ADSD contact information and a reasonable timeframe for an individual to make a request for accommodation for the meeting. Alternative ways to access the information and services on the website will be provided upon request.

230 FACILITY REQUIREMENTS

ADSD offices and facilities are required to meet the internal and external accessibility requirements of the ADA, to an extent reasonable and feasible, unless they cause undue hardship as otherwise determined by the Administrator.

The ADSD Safety Officer oversees all safety related activities of the division and facilitates compliance with ADSD safety policies. The ADSD Safety Coordinators will conduct an initial accessibility assessment of current offices and facilities using a nationally recognized [ADA Checklists for Existing Facilities](#) accessibility tool to determine the need for reasonable modifications of existing ADSD locations.

The ADA Coordinators, or designee, will provide training for Safety Coordinators on conducting accessibility assessments and coordinate with the Division of Public Works regarding accessibility for building modifications or new office locations.

240 RESERVED

250 ADA TITLE II GRIEVANCES

This grievance procedure is established to meet the requirements of the ADA Title II. It is designed to ensure that individuals feel seen, heard, and treated with respect and care. Anyone who wishes to file a grievance alleging ADSD violation of ADA Title II requirements based on disability may use this procedure. Grievances may be submitted verbally or in writing as soon as possible, but no later than 30 calendar days after the alleged violation.

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250.1 ADA COORDINATION AND TECHNICAL ASSISTANCE

The ADSD ADA Coordinator(s) are responsible for ensuring that ADSD meets Title II regulation compliance under the ADA. The ADA Coordinator(s) may include the ADSD Regional Coordinators, the Community Engagement Manager, or other designated staff members, as needed. Multiple coordinators may be designated based on organizational needs.

The ADA Coordinator(s) will communicate the contact process for the ADA Coordination Team responsible for compliance. They are also responsible for the development and maintenance of ADA grievance procedures, including periodic self-evaluation; ensuring the development and posting of ADA notices; and promoting equitable grievance resolution. Self-evaluations will be retained for a minimum of three (3) years. Additionally, the ADA Coordinators oversee the creation and maintenance of an accessibility plan for division approval and implementation.

The ADA Coordinator(s) work collaboratively with the ADA Training Officer, ADSD Human Resources, Program Leadership, and other ADSD employees and contractors to assist with Title II compliance and to promote and maintain an accessible and inclusive environment for individuals with disabilities. This includes working to ensure equal access to ADSD programs, services, and facilities.

The ADA Training Officer provides training and technical assistance to ADSD employees/contractors and works in partnership with the ADA Coordinator(s) to make recommendations for refining grievance procedures to promote equal access to programs and services for persons served by the division.

251 FILING A GRIEVANCE

ADSD program applicants, participants, and board/committee members who would like to file a grievance may submit the grievance in writing to the Lead ADA Coordinator or via the [ADSD ADA Inquiry Form](#), located on the ADSD webpage at [ADSD.nv.gov](#).

The grievance should contain the following information:

- The grievant's name, address, phone number, and email address. If a grievance is filed on behalf of another individual, the grievance should also include the filer's contact information and evidence of legal authority (if applicable), such as power of attorney or guardianship. To protect the privacy of the grievant, all communications will only be released to the grievant and a legal representative, and/or individual(s) authorized by a signed Release of Information.
- Name of the program and location of the alleged grievance.
- Description of the allegations including: the nature of the disability, specific accommodation requested, evidence that the accommodation request was

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made and evidence of the denial of the accommodation, the date of the allegation, and the date the grievance is being filed.

Grievances in writing should be submitted directly to ADSD at:

Lead ADA Coordinator
Aging and Disability Services Division
1550 College Parkway
Carson City, NV 89706
(775) 687-4210

251.1 ALTERNATIVE MEANS OF FILING GRIEVANCES

Alternative means of filing grievances and format will be made available for persons with disabilities upon review. To request assistance in documenting a grievance, individuals may contact the Lead ADA Coordinator. An individual may also file a grievance or seek ADA assistance through any of the following (not all inclusive):

- **Nevada ADA Assistance**
Online grievance forms will be forwarded to the proper state agency for review. <https://ada.nv.gov/>
- **Nevada Disability Advocacy & Law Center**
<https://ndalc.org/>
Las Vegas: 1-888-349-3843
Reno: 1-800-992-5715
Elko: 1-800-992-5715
- **U.S. Office of Civil Rights, Department of Health and Human Services**
90 7th Street Suite 4-100
San Francisco, CA 94103
1-800-368-1019
TDD: 1-800-537-7697
ocrmail@hhs.gov
- **U.S. Department of Justice Civil Rights**
<https://civilrights.justice.gov/#report-a-violation>
950 Pennsylvania Ave., NW
Washington, D.C. 20530-0001
Toll free: 1-855-856-1247
TTY: 202-514-0716

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252 GRIEVANCE RESOLUTION

All grievances will be reviewed thoroughly to determine the appropriate path and outcome. Grievances regarding denial of eligibility or program services will be directed to the appropriate program manager or agency of authority for resolution following the program appeals process when applicable.

Upon receipt of an ADA grievance, the Lead ADA Coordinator may assign an ADA Coordinator to be the main point of contact. The Lead ADA Coordinator or ADA Coordinators will:

- Contact the grievant to review and discuss the grievance and possible resolution. Initial contact must occur within 15 business days from the date of the grievance (unless otherwise negotiated) and must be documented. A grievant's failure to respond to a request for information may be deemed an abandonment of the grievance.
- Review the grievance, identify key individuals involved, and gather necessary information. This step may also include discussion with the grievant through an interactive process toward resolution.
- Identify a possible resolution with recommendations and work with the program leadership, ADA Training Officer, other key leadership, and/or legal advisers to review the recommendations before finalizing a response.
- Provide a formal response detailing the position of ADSD and substantive resolution to the grievant in writing via an ADA Accommodation Determination Form (ADA-GR-01) and in a format accessible to the grievant (e.g., large print, Braille, audio recording, verbally, etc.). Every effort will be made to issue a determination within 45 business days from the date the grievance is filed, or upon receipt of all information necessary and appropriate to the review the grievance and issue a determination, whichever is later.

253 GRIEVANCE APPEAL

The grievant maintains the right to appeal the decision. To file an appeal, the grievant must file the appeal in writing within 15 business days after the receipt of the formal written decision from the ADA Coordinators.

Appeals made in writing should be submitted directly to ADSD at:

ADSD Administrator
Aging and Disability Services Division
1550 College Parkway
Carson City, NV 89706

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253.1 ADMINISTRATOR REVIEW

The ADSD Administrator is responsible for ensuring division compliance of discrimination provisions and designates the ADA Training Officer, and ADA Coordinators for the division. The ADSD Administrator has the authority to approve ADA process improvements as recommended by the ADA Training Officer, and ADA Coordinators. When requested by a grievant, this position is the appeal to the ADA Coordinators, and all decisions are final.

Upon receipt of the appeal, the Administrator or designee will:

- Contact the grievant to review and discuss the grievance and possible resolution. Initial contact must occur within 15 business days from the date of the appeal (unless otherwise negotiated) and must be documented.
- Review the appeal, original grievance, and resolution provided by the ADA Coordinators.
- Gather information on the appeal. This step may also include discussion with the grievant through an interactive process toward resolution.
- Identify a possible resolution with recommendations. May work with the ADA Coordinators and/or the ADA Training Officer to review the recommendations before finalizing a response.
- Provide the grievant with a formal response to include the position of ADSD and substantive resolution. The response must be provided to the grievant in a format accessible to the grievant (e.g., large print, Braille, audio recording, etc.).

260 NOTICES

To ensure compliance with ADA Notice Requirements ([28 CFR 35.106](#)), the ADA Coordinators will develop, maintain, and post ADA notices in public spaces and on the ADSD website providing information on:

- Protections against disability discrimination applicable to programs, services, or activities offered by ADSD;
- How to request a reasonable accommodation;
- ADA Coordinators contact information; and
- The ADA grievance process.

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270 RESERVED

280 RESERVED

298 AUTHORITY

[28 CFR 35](#)

[28 CFR 36](#)

299 ACRONYMS AND DEFINITIONS

Americans with Disabilities Act (ADA): A civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the public. ([28 CFR 35](#) and [28 CFR 36](#))

Assistive Listening Systems: Consists of a microphone, transmitter, receiver and coupling device such as earphones and transmit sound without losing intensity.

Assistive Technology (AT): Any item, piece of equipment, software program, or product system that is used to increase, maintain, or improve the functional capabilities of persons with disabilities.

Auxiliary Aids and Communications Services: Mechanisms used to provide effective communication based upon the needs of the individual.

Captioning: The process of converting audio information into text. Captioning can be either open or closed. Open is when captioning is always visible and can't be turned off and closed is when captioning can be turned on and off by the user.

Communication Access Realtime Translation (CART): Accessibility solution that provides real-time translation of spoken language into text for broadcast (e.g., computers, projectors, monitors and mobile devices).

Effective Communication: Whatever is written or spoken must be as clear and understandable to people with disabilities as it is for people who do not have disabilities.

Grievant: Any constituent that is alleging an ADA Title II violation.

Interpreter: An individual who has been tested for language skills; trained as an interpreter; and who facilitates communication from one language to an individual's primary or preferred language.

Primary Consideration: The honoring of an individual's expressed choice of accommodation when determining when an accommodation can be accepted or denied by the division.

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Speech-to-Speech Transliterators: An individual trained to recognize unclear speech and repeat it clearly.

Teletypewriter (TTY): A communication device used by individuals who are deaf, hard of hearing, or speech impaired. The device includes a keyboard and a screen allowing users to type messages that can be transmitted over a phone line to voice callers.

Undue Burden: A significant difficulty or expense.

Video Remote Interpreting or Video Interpreting Services (VRI/VIS): A sign language interpreter that appears on screen (e.g., computer, video conferencing technology) over high-speed internet lines with another individual so that they can see one another while signing.

Video Relay Services (VRS): Enables an individual who uses sign language to communicate with voice telephone users through a relay service using video equipment. VRS provides on demand interpreting for individuals to communicate with one another through a telephone connection.

Webpage: An internet-based document, usually in HTML format, that can contain a wide variety of information and multimedia content.

Website: A collection of webpages that is organized around a home page.