

Pacific ADA Center
Emergency Management and Preparedness-Inclusion of Persons with Disabilities
Thursday, December 12, 2019
2:10-4:00 p.m. ET

>> LEWIS KRAUS: Welcome to the Emergency Management and Preparedness: Inclusion of Persons with Disability Webinar Series.

I'm Lewis Kraus, your moderator for this series. This series of webinars is brought to you by the Pacific ADA Center on behalf of the ADA National Network. The ADA National Network is made up of 10 regional centers that are federally funded to provide training, technical assistance and other information as needed on the Americans with Disabilities Act. You can reach your regional ADA Center by dialing 1-800-949-4232.

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This webinar is being recorded and can be accessed on the ADA presentations website in the archives section next week. This is the fifth year of this Webinar Series, which shares issues and promising practices in emergency management inclusive of people with disabilities and others with access and functional needs. The series topics include emergency preparedness, disaster response, recovery and mitigation, as well as accessibility and reasonable accommodation issues under the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, the ADA and other relevant laws. Upcoming sessions are available at ADApresentations.org under the schedule tab in the emergency management section. These monthly webinars occur on the second Thursday of the month at 2:30 eastern.

By being here you are on the list to receive notices for futures in this series. Those go out two weeks before the webinar and open the webinar to registration.

You can follow along on the webinar platform with the slides. If you are not using the webinar platform you can download a copy of today's PowerPoint presentation at the ADApresentations.org web page in the Schedule section.

At the conclusion of today's presentation, there will be an opportunity for everyone to ask questions. You may submit your questions using the Chat area within the webinar platform. The speakers and I will address them at the end of the session. So feel free to submit them as they come to your mind during the session.

Excuse me.

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And also let us know about any issues at adatech@AdaPacific.org, at that email address or you can call us at 510-285-5600.

Today's ADA National Network learning session is titled "FEMA'S Section 504 Disability Access Plan." FEMA is engaged in implementing Section 504 Disability Access Plan to enhance access for people with disabilities and strengthen compliance with Section 504 of the Rehabilitation Act. FEMA's Office of Equal Rights is leading this effort and will provide an overview of the 504 plan in the five focus areas. Public information. Training and exercises. Publishing the rights of people with disabilities. Disaster recovery systems and facilities. FEMA's Office of Equal Rights seeks to build disability related capacity within FEMA through the 504 plan. This webinar will provide an overview of FEMA's 504 Disability Access Plan and strategies the agency is employing to address the need for enhanced access for people with disabilities in those five focus areas.

Today's speaker is Stephanie Fell. Stephanie is a senior civil rights policy adviser, Section 504 coordinator at the Federal Emergency Management Agency, or FEMA. She is responsible for disability-related policy and civil rights compliance in connection with FEMA conducted and FEMA funded programs. Previously Stephanie served in FEMA's counsel office and Office of Disability Integration and Coordination.

Stephanie has deployed to a number of disaster operations to promote disability integration in FEMA's programs.

So, Stephanie, we will now turn it over to you and you can take it from here.

>> STEPHANIE FELL: Okay. Thank you very much, Lewis. Let me get the...

Okay, great. Here we are.

Welcome, everyone. Thank you very much for your participation. I see we have many, many people on the webinar. I have been a listener to these webinars but this is the first time I've been a presenter. So I feel quite honored to have the time with you and have hopefully a robust dialogue with you. After the presentation. The main focus, I just want to let everyone know, this Section 504 Disability Access Plan, I'll explain how it came about. It's focused on the information I'm presenting, is generally focused on what we're doing internally at FEMA to strengthen access for our external customers disaster survivors, any member of the public the agency is engaging. And you'll see as I go through the presentation and talk about the five focus areas, we're keying into, in our plan, that there are some strategies that we're offering. These are not, obviously, the only strategies, and so the idea here is to let people outside FEMA know what we're doing and be transparent about what is happening, and also seek your input, because in the end we want to measure change with our disaster survivors and end users of FEMA programs, not just have sort of internal activities, but we want to be measuring and enhancing access externally. So we'll get started. Because I'm not quite sure of people's knowledge level here about the legal authorities, I mean, not that we need to delve so deeply into them, but I wanted to just give an overview, because, again, there are a lot of people on the webinar interested in this subject. Some may have an understanding of the legal requirements, the legal framework. Some may not. But I just think as a reminder, because this is called our Section 504 Disability Access Plan, I wanted to just provide an overview of what we're talking about at FEMA when we talk about disability inclusion, disability access. We are operating as a federal agency, FEMA is. We are held responsible for disability inclusion, nondiscrimination, and also providing equal access under Section 504 of the Rehabilitation Act. This covers federal agencies. I came into being before the ADA, but they're essentially parallel authorities. Courts interpret them similarly. So Section 504, as the second bullet says applies to FEMA's programs and activities. So anything FEMA is doing that touches the public would be covered by 504 and would require that we provide access to people with disabilities, which means planning for people with disabilities and also being able to modify our programs, policies and procedures in order to provide access.

In addition, Section 504 applies to recipients of federal financial assistance. Recipients of FEMA's funding. And in this context, that would be our state, local, tribal and territorial governments and emergency managers, because they do receive funding from FEMA. And so in essence, they have the same obligations as FEMA does under Section 504 to provide equal access to people with disabilities.

And then what is slightly unusual or maybe a little bit different here is FEMA actually has its own nondiscrimination provisions that apply to FEMA under the Stafford Act. The Stafford Act is the authorizing legislation for FEMA's role in coordinating the federal response to disasters, and there are two provisions in there that specifically talk about nondiscrimination and disaster assistance. That is Section 308. It's a broad nondiscrimination provision covering race, color, religion, nationality, sex, age, disability, English proficiency, and economic status. And I'm quoting the distribution of supplies, the processing of applications, and other release and assistance activities.

And so we actually have in some ways our own civil rights laws that apply to FEMA, law that applies to FEMA. In addition, because FEMA is a relatively old agency, we have our own regulation that implements Section 504, and that is 44 CFR Part 16. That's significant that would spell out our compliance procedures for civil rights violations of Section 504.

Now I just want to go on to -- we're going to be talking a little bit more about our plan. Why did we do this plan? What is it? Under the regulations of Section 504, it requires agencies to do a self-evaluation, meaning look at its own programs and activities and see whether -- assess whether or not or how well the agency is providing access to people with disabilities.

And I think some of the reasoning behind this was an understanding that it would take time for agencies to bring about access, but another reason for this self-evaluation I was told from one of the individuals who helped draft these regulations at the Department of Justice was they wanted -- DOJ wanted federal agencies to involve people with disabilities, to hear from the user or the customers of these federal agencies about how well the agencies were providing access.

And so the department of home -- Homeland Security is one of the umbrella entities, one of the components of DHS and the Homeland Security said, okay, every component is now going to do an evaluation. So that happened -- they had some policies implemented that required this a number of years ago. And this evaluation started in 2016. And so this has been a multi-year process to get to where we are. FEMA did conduct a self-evaluation looking at gaps and barriers to access for individuals with disabilities in FEMA programs and activities. That is what the focus is. Not the funded activities, just the FEMA programs and activities. And that was done -- we included some disability stakeholder input over the course of that self-evaluation and we collected a lot of data about the gaps and barriers. We then took that data and presented a self-evaluation report to the head of FEMA, and then it has to be approved by the Department of Homeland Security. Because the Department of Homeland Security, my understanding is they wanted to make sure it was done thoroughly and rigorously and not just -- so they were going to assess all the components to make sure they met the requirements that DHS had set forth, which were actually quite detailed.

So FEMA did that and then we were responsible for developing a plan to say, how are we going to address these gaps and barriers? That too took a number -- probably over a year to develop the plan, and that's what we finally had approved by the FEMA administrator and approved by Department of Homeland Security the Office for Civil Rights and civil liberties on August 12th, 2019. What Lewis mentioned is we took a lot of data and tried to put it in five focus areas so people in the agency could get their arms around what we're talking about. FEMA has a very complex mission as many of you know. We operate at the national level as well as through ten regional offices, and then in disaster sites, in the continental United States, Alaska and Hawaii and all the territories, and that is different employees working there, different leadership, able different kinds of disasters that we must enter into and provide access in those settings. The idea in developing the plan was to come up with five focus areas that are going to resonate with FEMA personnel where they say, yes, we do this, we need to think about inclusion in this area. So we'll be going through the five focus areas together today so you have a sense what we're doing internally around this.

And we're in a very, I think, significant time period right now. DHS is requiring all the components to provide a written progress report to them, again, so that this effort to do the self-evaluation and plan to address gaps and barriers and making progress under the plan is reported to DHS and basically holding ourselves accountable to DHS and DHS is holding us accountable by requiring this progress report.

So the work now for me and my colleagues here is to engage our FEMA program offices, our regions, our disaster sites and tell them about this plan, what the requirements are. Many people know about 504 in FEMA, but right now we really -- we need to improve and be more consistent in how we're providing access for people with disabilities to people with disabilities in these five areas, and that we need to measure progress and report it to DHS within roughly a six-month period of time, a little longer. So it's a key time that we are in right now. That's why it's a great opportunity for me to be here today, telling you what is going on. Because we do need your help coming up with ways to measure meaningful progress in terms of our disaster survivors and other members of the public FEMA engages.

FEMA engages people, as you know, at the disaster sites, but we also engage people through preparedness activities and through our work with state, local and tribal territorial governments. It's not just the disaster sites but where we coordinate the federal response to a federally declared disaster. It's also in a lot of planning and mitigation activities before disasters and following disasters. And so there is, again, a lot of areas we can touch on when we talk about public-facing programs. So I'm going to go through just a number of public-facing programs with you that FEMA carries out just to kind of make it a little more understandable in terms of what we'll be talking about a little later. So one of the main things FEMA does in terms of actual engagement with the public is providing money, providing disaster assistance to people who have been impacted by the disasters. So people register for FEMA assistance. They provide the right documentation and the right information to be eligible to receive money. And so that is one big way in disaster operations we touch the public. Also, if you're a homeowner, we are responsible for sending out individuals to inspect the damage of the place where you were living. So, again, those have to be arranged. Those are actual meetings with homeowners at their houses with an inspector. That's another very big way we touch members of the public. We also, if people are eligible and if the disaster is authorized to provide temporary housing, and this depends on a number of factors, a family -- a person could be eligible for FEMA temporary housing. That is a very significant way we touch members of the public because a family or individual who is eligible for temporary housing from FEMA could stay in that housing up to 18 months. And so that is one other public-facing program FEMA carries out.

We also carry out the national flood insurance program, meaning we sell flood insurance to members of the public. This is done largely through contractors, through insurance companies. This is a key point too because this -- the 504 self-evaluation and the 504 plan include any activities, any programs FEMA is carrying out through contractors. And so the contractor is standing in the shoes of the government and also must provide access under Section 504. And the national flood insurance program is, again, a very, very large program where many, many members of the public are engaged with FEMA to buy flood insurance.

We're also communicating with the public quite consistently because we want to promote people to buy flood insurance to minimize risk. This is where this next bullet of responding to inquiries, sharing information with the public, this would come under any of our website information, things like some of the interagency documents. I see someone mentioned the National Preparedness Report things like our -- anything around flood insurance program, any program -- any training materials, these are all information sharing with the public or receiving inquiries when people have questions about these things. Public messaging, maps, flood maps, things like that.

I just have a few more to give you illustrations of just some of the big programs. Other FEMA public-facing programs and activities would be any job fairs or recruitment events. We go to some colleges and universities. We go to places in the public to engage potential employees. They would be considered public-facing programs.

Any of our online courses or our classroom training is another area where it would be considered public-facing activity, and FEMA does a lot of training, specifically of state, local, tribal and territorial emergency managers, but also others. And we have both online information as well as in-person training.

Public events where we're inviting people to come in, this happens a lot in disaster sites. It also happens in other -- we have regional offices that have weighed consistently where members of the public are coming in other meetings, but we're inviting people into our organization obviously as a public-facing activity. And then another area would be our contracting and procurement needs. We're working with and soliciting vendors, soliciting information about whether people can provide a certain service to FEMA. That just gives you a sense of some of the areas we found to be relatively large areas where FEMA does touch the public. There are others, of course, but those are some key ones just to set up a context for you.

Again, for our program office to say, oh, yeah, we have public meetings. We're administering training. We hold exercises in other public activities because we're engaging people outside FEMA.

And so on this 504 plan, I think DHS was very thorough in the sense they are requiring for us to post it publicly. It has been -- ours has been posted on our FEMA.gov website. If you search for civil rights, I think it says 504 Disability Access Plan is the link. This is the link on the slides, so you can take it right from here. We want people to look at it and we want to hear from people about it. In my work I'm doing a lot of briefings and trainings internally of program offices right now, and I am helping them understand that they will be hearing from members of the public about this plan. And the program offices themselves, it may not come to me, it may come directly to them. They should be aware of that and be ready to respond to questions or, you know, work together with people who have inquiries about this plan. And so this is a great opportunity, again, for me to make you all aware of that. And please take a look at it and we would like to hear more about your views on what the plan says. And then over time, as I said, we'll be implementing the plan and the progress report. So hopefully you'll be seeing measurable changes through this effort.

That's the goal. So we'll get into the plan now. Lewis, I think, mentioned these. Kind of generally we'll get more in depth for each one of these. We made these five categories, as I said, so program offices would see themselves. So the first category is that our public information and the platforms for distributing that information, including public events and meetings, they must be accessible. It's an area we need to improve. So that was a gap or barrier that we weren't doing as good a job in as we should be doing. And so that we need to, across the board, look at our public information and also, you know, meeting sites, social media, any kind of -- whether electronic platform or actual in-person, we want to make sure that public information is accessible, the content, obviously, too.

The second big area is for improvement for enhancing access and enhancing compliance with Section 504 is the area of trainings and exercises. And the idea is that we want the training and exercises to be inclusive to reflect the people that we're serving, the people, the members of the public. Our mission is helping people before, during and after disasters. And so our trainings and exercises must include people with disabilities in the planning, in the updating and the evaluating of these two things. And we'll talk a little more about that. And also particularly with trainings, we want to make sure the content is accessible to people.

The third area that we came up with as an area that needed improvement is that we were not doing a thorough a job as we could in terms of notifying members of the public about their rights under Section 504. So both making those 504-related rights explicit, and then making sure the notice is widely available for people, that they know how to contact FEMA with a civil rights concern and that it gets to the right place and that it's addressed. So we'll talk a little bit about that.

And the next area is a very big area that FEMA is responsible for when there's a federally declared disaster, and that's the disaster assistance and recovery programs. They, too, needed to be improved, enhancing access and inclusion in terms of having the ability to have a person -- a member of the public be able to self-identify with an access need and have that access need met in a timely manner. We'll talk more about that one, but that is one of the main areas. And the fact that recovery is quite a long process, and that inclusion must be a part of that throughout long-term recovery. That was another -- that is another focus area, meaning we had a gap or barrier we know we need to improve in this area.

And then the last one is about our facilities. And unlike a lot of federal agencies, we end up having to lease facilities at disaster sites. Often very large numbers of facilities for things like disaster recovery centers or points of distribution. Obviously workplaces for the people who are working for FEMA or with FEMA at a disaster site, and we want to make sure that those facilities are accessible to people with disabilities, whether they're employees or members of the public who come for an event or come for a meeting. And so that has proven to be challenging in our work. So that was another focus area we wanted to key into. And we'll talk a little bit more about what our strategies are with respect to that focus area.

So the first area that, again, I'm in some ways talking about this exact information internally here at FEMA. So it gives you a sense of what I'm doing internally to try to promote people's

understanding and promote a culture change. And so helping -- reminding people, reinforcing for people that we must have accessible public information and platforms. And we mean, when we say this, that our communication, the information we provided in written, spoken or any alternative mode of communication, that it is clearly understandable and actionable for the whole community, including people with disabilities. And when we talk with colleagues internally at FEMA, I like to just make it clear to them, we're talking about people who need effective communication access, which is a requirement under Section 504. Those individuals may be people who are deaf or hard of hearing, people who are blind or have low vision. People with cognitive or intellectual disabilities. People with limited literacy, low literacy, people who have limited English proficiency, who may not read or speak English well or at all. And I say others who may not self-identify. Really any of these groups may not be self-identifying that they have a need, but we know that our public is a very large public and very diverse public and we definitely have to meet the communication needs of people like this.

And so we want to be proactive about that, and also not make assumptions about what people need, but I'll be getting into that a little bit later.

So some of things... I missed a slide. Sorry.

So some of the things we're talking about here, internally to help my colleagues understand, what are we talking about when we say "accessible public information," trying to break it down for them. One way to think about it is to be proactive, to provide access upfront. That is the goal in order to be an inclusive organization and also a goal to fulfill our obligations under Section 504. And so proactively providing -- we have in the past, you saw our administrator always accompanied by a certified deaf interpreter. He would actually travel with that individual to make sure he was providing access when he spoke. Providing captioning at meetings. Providing -- having information available in these alternative formats if someone actually needed it. So another way we're providing accessible public information is to be able to respond to a request if someone needs something different, if someone says, I need this information in a different format. For example, Braille, large print, electronic format. Something different from the way that we're providing it.

And I talk internally at FEMA and I try to help people understand that although we may be providing information that works for many members of the public, we may not -- we may inadvertently be denying people information or denying people a benefit or service, and so 504 does not require intentional discrimination. It's just -- what we're doing is it provides a gap or barrier to someone with a disability. So it takes a lot of kind of forethought and consideration and understanding of the needs of people with disabilities to make sure we're not inadvertently providing a barrier. So there's a lot of internal education that is required here.

And this last bullet let is a good example of that.

This idea of conceptual plain language, that people read at a certain level and we want to make sure everyone can understand the information we're giving to them. FEMA information is often very dense and complex and we're working internally to really make it simpler, less

wordy, more understood through pictograms, to the extent we can. And the idea of conceptual plain language is we have a certified deaf interpreter who actually helps change some of the wording to something that is very literal and understandable by people not using idioms. And so that is one thing -- one strategy I'll get into. We want to make sure all our public messaging is accessible to everybody and that they're getting that information at the same time as everyone else, not delayed or secondhand. So these are the things I'm educating colleagues on or reminding colleagues about internally. Some of the strategies that we are promoting internally at FEMA and executing is to develop policies and programs that ensure effective communication access across the agency. And that requires taking into account the ever-changing availability of services and technology depending upon where we're carrying out our mission. That is where the services may be more difficult to procure. For example, sign language interpreters in a rural setting might be more difficult to procure quickly than they would be in a large urban area. We need to be able to anticipate that and be able to address any shortfall. Obviously technology has changed so many things about our society and also changed a lot of ways people with disability get information. So that is something we really need to be much more aware of and stay current with and responsive to any communication access that may arise related to kind of technology interface issues. The second thing is providing the use of sign language interpreters, and we had a very large disaster, as you know, in Puerto Rico, where the primary language is Spanish, this idea of communicating with deaf people in Puerto Rico and what the needs are. We want to provide captioning, either proactively or certainly upon request.. That can be done in person with a person who is actually taking the information and transcribing it there, or remotely through Fed Relay, and making ongoing efforts internally to look at our 508, our technical requirements for web-based electronic information, whether it's a Word document, Excel, PowerPoint, any platform is compliant with Section 504, and we have a Section 504 program manager. I work with them quite closely. We have to cover a lot of ground and it's an ongoing challenge. People need to understand how to make these technical requirements upfront for all of our public information. Related to that is the videos. That seems to be a very popular way of sharing information, making sure our videos are compliant with 508, captioning and audio description, and at times we have been successful in embedding ASL interpreters into videos as a way to provide greater access for people who use sign language in our videos. And that's another way that Section 504 relates with Section 504. That's not necessarily a 508 technical requirement, but it's something that FEMA has done and wants to make a consistent practice, particularly in the disaster operations context.

And providing information in alternative formats in a timely manner, knowing what somebody needs and being able to meet that request.

Another way our public information, we want to make it accessible, is just letting people know for things like webinars, trainings, public meetings, if we just include the tag line as consistently as we can, if people have access requirements, and that in this context would be about the materials that we're presenting, if for some reason people need them in a different format, we want to make sure we can meet that need in advance of the event.

So the next area I'll just be talking through with you is our training and exercises. Again, this was a gap, this was a recognition that we need to improve inclusion of people with disabilities in FEMA trainings and exercises. And so when we say "integrate the needs of people with disabilities," one of the main ways to do that is including them at the table in the planning or the updates, or as I said earlier -- as I said earlier, the evaluation. And then this related piece, again, I told you we had a lot of data we had to put into these categories is we need to make sure internally that people in FEMA understand our mechanisms, whether it's through a contract or otherwise, how we get what we need for effective communication access. This may be an auxiliary aid or service for someone who needs something. And so we saw that there was a need to improve internally people's understanding of how to get what they needed for a member of the public who requests something.

So for this piece, one of the things that we recognize is we need better courses just about -- courses about anything. We need to be integrating the needs of people with disabilities not just in trainings about inclusive emergency management. And all FEMA trainings, really for anything that would touch a disaster survivor or members of the public. So we want to be thinking about access across the FEMA training spectrum. And that will take time. I know it will, but we have dialogue with our training developers now. I work in the Office of Equal Rights and our job really is to make sure the FEMA trainings include all civil rights requirements, and so that is something that is a strategy to address this gap or this shortfall with our training colleagues. We also need to, the second bullet, do a better job of making sure everyone in FEMA understands what Section 504 requires and what disability access means. That would be for members of the public who are -- I'm sorry, FEMA employees who are on the telephone with members of the public, they need to understand better what some of the needs of people with disabilities may be, so that when they hear something they know what to do with that information.

I'm also working -- I'll get into this a little later, but working with procurement people so they understand in a contract if a housing inspector isn't providing communication access, that's a violation of the contract, because all of the federal contracts require civil rights obligations be met. And so there's a big education piece about what 504 is, about what inclusion and disability access is internally at FEMA.

I will say we have started that through this 504 plan. We are going to have to continue that and do more work. We have an online training course about civil rights, more work on a piece of that, but that is I think a need that will be met over time.

The third bullet is just about videos, training videos and audio description and captioning. There's a lot of use of videos in training now, links to other people's training. We just want to make sure whatever training videos or whatever information, educational materials that we're recommending for people are captioned and have audio description so that everyone can receive the information. So that's another area we're keying into now. Explicitly including people with disabilities in our FEMA trainings and using person-centered language. We have guidance documents on person-centered language and disability etiquette. The idea is that when people see themselves in FEMA's training materials and public information, there is a better understanding, oh, they are thinking about my situation. So that is another thing we're

working on. There has been some significant change in that area. There's more inclusion in our -- in all of our material, I would say, but we can do a better job, particularly if we bring disability stakeholders into training videos. This gets to -- the last bullet gets to the national and FEMA-led exercises. There's a national-level exercise coming up in 2020. We want to use that as an opportunity to engage disability stakeholders in the planning, in the exercise play, and in the evaluation of the exercises. And we do this through partners at DHS to talk about disability inclusion, they're working with us on the national level exercise, and our regional -- FEMA has Regional Disability Integration Specialists who engage disability stakeholders in the different states. There are ten FEMA regions across the country, each comprised of several states, and those Regional Disability Integration Specialists are engaging disability stakeholder organizations in their states. And so we have organizations to bring in, it's just a matter of working with the FEMA offices that are handling the exercises to make sure that they're invited in and that that inclusion is consistent from beginning to end. So that is something we're working on right now as a strategy to address that shortfall.

So this was, again, FEMA -- it came out in the evaluation and we're addressing it through the plan, that we have to provide a robust civil rights notice, and that the civil rights notice must include the Section 504 piece which making it clear that people can request an accommodation and how to request that. Our new civil rights notice has that information on it. And, again, the civil rights complaints process and the rights of the public under Section 504 must be well-understood and within our organization. So members of the public may not realize this and even people at FEMA may not realize this, but the FEMA Office of Equal Rights has the authority to look into civil rights complaints related to FEMA activities. In essence we're investigating our own program, the Office of Equal Rights does. So that would include a Section 504 allegation or alleged violation of that statute. And so it must come in through this 504 plan, making people aware that is one function of the Office of Equal Rights, that we are responsible for this and if there is a violation we'll have to address that. Most likely through a training and through technical assistance to our program offices, but that it's not -- it's a requirement, that it's not just something that they can choose whether or not to do. And so that is the -- the enforcement part is the Office of Equal Rights' job. That's why it's really important that members of the public know to contact this equal rights office for a civil rights concern. My sense is that in the past there hasn't been a clear place for people to engage on civil rights related issues and it may have gotten into FEMA but not gotten to the right place, and so it may not have been addressed either at all or adequately. So I really want to try to do my job and work with others to help them understand any civil rights concern needs to come to the Office of Equal Rights, and that's what the civil rights notice is.

This piece about the 504 requirements in contracts or public-facing activities, that is an area we're working on with our procurement office right now. And I'll get into that in a second when we move over to the strategies about the civil rights notice.

As I mentioned we have this updated civil rights notice, who to contact if you think your civil rights have been violated and who to contact for a reasonable accommodation request or a language access need under Title VI of the Civil Rights Act, and this is if an individual in the public cannot access a FEMA program or needs assistance accessing a FEMA program. It's much more clearly stated in our civil rights notice. And that has already been updated.

So just kind of -- just drilling down on that, we have equal rights advisers. FEMA is comprised, in a disaster, groups of people who are deployed or sent to the disaster site and they're organized by kind of subject matter. So the civil rights subject matter expertise is in this -- they're under the role of the equal rights adviser. So they go out to the disaster site and it is the equal rights adviser's responsibility to make sure the civil rights notice is posted in physical spaces like disaster recovery centers but also through press releases, social media, and community partners. We want to make sure people in the community understand where to bring a civil rights concern or an access need to. And so, again, the equal rights advisers are working with the leadership at the disaster operations, they're part of the command staff to make sure that FEMA leadership understands and is explicitly saying -- understanding that FEMA has affirmative responsibilities when it comes to providing access to people with disabilities and also information in a different language than English for people with limited English proficiency. Those two areas require a lot of anticipation on FEMA's part, on FEMA programs' part and then ability to execute as soon as the need is identified. So that is one of the roles the equal rights adviser is playing at the disaster site. Our office also plays that role at the national level along with some other offices at FEMA, and then we have -- we would help at the regional level as well, the Office of Equal Rights would, in terms of access needs for people with disabilities and language access.

So the equal rights adviser, again, at the disaster sites, is going to be promoting to all the program offices to have a tag line or civil rights notice line in any announcements for webinars, trainings and meetings about access, and that participants are entitled to ask for accommodations and they must be met in a timely manner. As I just mentioned, they'll be working with the federal coordinating officer. That is the individual in charge -- basically in charge of the whole operation, and have that individual make explicit the support, the understanding, that there are civil rights requirements and that there are expectations for the operation, that those -- I'm sorry -- that the civil rights requirements are met by all programs, and have that reiterated throughout the disaster operation. And as I mentioned earlier, some of the Section 504 plan that relates to FEMA's need to enhance access and improve compliance with the disability-related civil rights law is to demonstrate to our local -- our state, local, tribal and territorial counterparts the importance of civil rights, the how to do this, what we're doing to provide access to disaster survivors. It needs to be a continuum, whether dealing with FEMA or dealing with their state government, that access is provided. And so the better job FEMA does at that, it's showing by example, and also it's holding them more accountable for our federally-assisted activities, but first FEMA has to demonstrate its ability to do it and shows how we're providing access. And we could be a better example, I think, by being more consistent and making it more explicit, how we're doing this and why it's important, and that is a requirement across FEMA. And one of the main ways to do that is to make sure in an equal rights adviser will serve in this role at the disaster site, that we're hearing from the community, hearing from civil rights organizations so that there's information exchange with them, ideally before the disaster and certainly during the disaster to make sure we're getting feedback on FEMA's program delivery, being more proactive and responsive when concerns are brought to FEMA. We want to make sure that they're able to be addressed. And that really does come down to community engagement and normalizing that and having the flow of information back and forth, particularly at the disaster level. That is envisioned now to be

facilitated by the equal rights adviser and other people at the disaster operation. Also one of the things that the equal rights adviser would do is make sure everyone in the community has the civil rights notice. So making it more of a -- you know, something the community is aware of and has in hand.

This next area is a big area, our disaster assistance and recovery program. What we have found out through the self-evaluation is that we need to be more consistent in the way we address the disaster-related needs of our survivors with disabilities. And one of the main areas for improvement is making sure people are getting an accommodation or a modification that they may need to access a FEMA program. We'll talk a little bit about that in the strategies. Similarly, this is an example of a FEMA program. I mentioned earlier temporary housing unit, a family may be eligible for that under -- depending on the disaster, depending on the family needs and circumstances. If they are eligible, FEMA needs to improve the way it provides the correct accessibility features for that family in the housing unit they receive. And that is viewed as an accommodation or modification. But mostly we're talking about accessibility features related to the temporary housing. And I mentioned earlier our disaster recovery program goes on for a long time, and that FEMA needs to do a better job of consistently integrating the needs and perspectives of people with disabilities in these community-related recovery programs.

So some of the things we're doing internally, just so you know, I wish things could happen as quickly as I would like them, but it does take time, and I know that's not something people like to hear, but it does take time. Right now we're actively engaged in providing a way for survivors with disabilities to clearly self-identify an access they need, a functional need they have through the registration intake process. So that will become a question that people can clearly answer and state what their needs will be. That will be the best way for people to make the agency aware of the need, and so that would be from registration and through appeals of any -- you know, FEMA assistance, you can appeal if something is denied, throughout the delivery of assistance. Again, people may have a longer relationship with FEMA depending upon the disaster site and what they may be eligible for and what their needs are. Until that happens, we are working internally to strengthen the internal process to receive those requests through our civil rights notice is one way we'll be getting more of them and making sure the needs are met until that question is changed. But that is being -- that is one of the main strategies we're working on in connection with this shortfall. Then we want to hear from members of the public about civil rights concerns, of course, because we want to be accountable. We want our programs to be accountable to the public and transparent. And we want to be able to use the civil rights-related complaint data to educate our leadership. Of course the goal is not to only rely on civil rights complaints. We want to be proactive and inclusive upfront. If, however, there is a concern, we would like to hear about it and be able to use the complaint data to educate leadership on actual complaints we have received from the public. And I think in the past perhaps we haven't been able to do that as well as we're anticipating doing it now. So that has to do some with our civil rights compliance capacity that's being enhanced right now. So that is one way we want to use the civil rights complaint data, is to show to our leadership, this is a real problem, we're hearing from members of the public this is a problem and we need to address it immediately.

So this last area in the plan, it has to do with our FEMA facilities. So obviously we have buildings around the country where FEMA -- you know, people work and their meetings and we hold activities. One of the main areas, though, is when we go out to the disaster sites, when FEMA leases facilities where a disaster has happened, places like disaster recovery centers, there can be many, many of those. So we're leasing a lot of buildings. And points of distribution. And any other physical space where people -- members of the public would come, we need to make sure -- again, this is a shortfall -- that they're fully accessible for people with disabilities. So there's recognition that we need to improve this. And then in this category we also put -- because it fit best here -- that our Occupant Emergency Plans need to anticipate the needs of occupants and visitors who may be people with disabilities who might need accessible alerting, assistance with evacuation, something to assist them in an emergency, and we want to be more explicit of those needs in our Occupant Emergency Plans. Again, that was the shortfall we discovered through the self-evaluation.

So in the physical access area, we are governed by a set of accessibility standards, the Architectural Barriers Act standards, they cover federal facilities. So in my role here, I just make people aware that there are technical standards we're responsible for complying with. There is an education piece. These are technical standards, any of our facilities people can use to make sure that we're providing accessible facilities. I'm talking measurements, heights, things like that. And so some of it, like I said, is really an internal capacity building internal education reinforcement of these same principles. And so we focus -- the focus area, DHS suggested we focus on parking, paths of travel, entrances, entrance vestibules, interior doors, corridors, toilet rooms, these things, drinking fountains and visible and audible alarms, our signage always can be better in terms if there does have to be another entrance. We want to make it clear how someone gets in a building and wheelchair turn areas, things like that. That is done through -- we have an accessible checklist. We have a policy, internal policy about accessibility and leased facilities. It just needs to be more consistently implemented and confirmed that it's being done in a timely manner at the beginning of the disaster. We're also promoting the most integrated setting for all disaster survivors. But not immediately saying we'll have a separate accessible porta potty outside. We want to make the whole building accessible for our disaster survivors who are coming. That's another education piece, because in the past sometimes the solution has been to get that separate accessible toilet. If there's no other solution, that would be one, but we want to be as obviously as integrated as we're required to be.

This is another area where equal rights advisers would help in meetings. We want meeting places to be accessible, if we're holding a public meeting or event. And we do site inspections at the beginning of all the facilities, including the equal rights adviser with this checklist and we also engage the U.S. Access Board for technical assistance here. They have come to training for equal rights advisers. They will come again and we will use them as technical experts when we have -- particularly when we have inaccessible buildings that are being leased if there's no other option and what is the best way to quickly make it accessible for people with disabilities. This is an ongoing effort. In areas where it's -- where it makes sense and is able to be done we want to anticipate the needs in a certain area and identify accessible buildings to lease before the disaster. That is not available in every part of the country and in every type of disaster. For example, I was talking to a colleague in California where all the buildings had

been burned down in the areas where those have been those wildfires, so pre-identifying is not going to work. In that instance, we have to be flexible because the disasters are different and areas of the country are different. Puerto Rico had a lot of older inaccessible buildings that became disaster recovery centers and had to be modified.

And then in the facilities piece here, we have our Occupant Emergency Plans internally at FEMA when we set up any facility, we want to make sure there is an Occupant Emergency Plan for evacuation and that in that plan, that the safety people and the security people and leadership have considered occupants and visitors with disabilities who may need something, an accessible alerting system or assistance with evacuation. So that is another way that we're trying to address this gap in physical access that we discovered through the self-evaluation.

And I have just a couple more slides, I think, just to help you understand a little more about what the Office of Equal Rights is at FEMA. Again, this would be so people within FEMA know about this. It's not -- it's a responsibility that I think needs to be promoted and enhanced in our organization, but the office is responsible for providing advice and guidance to senior leadership and program staff, so, again, we can be as proactive and anticipate the barriers to equal access and address them upfront and then providing equal opportunity for people with disabilities. Again, upfront or in response to a need for modification. So that's the second bullet. If there is a request for modification or a change in policy or procedure or programs or a request for assistive technology or something someone needs to access a program, our office can help that program office immediately. And it's important for members of the public to understand that too. Because FEMA does have an Office of Disability integration coordination. We have other offices that engage the public like external affairs where we have communication access specialists and the Office of Equal Rights, it's important for you to know we are the ones responsible for civil rights, technical assistance, and I think the next slide gets into more of our compliance function. And then this piece about our equal rights advisers being at disaster operations, we work closely at the regional level with the Regional Disability Integration Specialists and regional leadership. And also we have two training sites where members of the public, including our state, local, tribal and territorial partners come for training. We want to make sure we're consistent in terms of whatever access needs there are in that educational setting, that the Office of Equal Rights is partnering with them to provide access in the educational setting, and also the physical plant, because often these are multi-day courses where people come and stay, and also transportation to and from.

So this -- I think this may be the last slide. This one is about the civil rights compliance function. And, again, I think there was not a high understanding within FEMA itself that the Office of Equal Rights has the authority to investigate civil rights complaints brought by members of the public, including disaster survivors, but not limited to disaster survivors. I've received complaints from state -- like a local emergency manager, other members of the public, not disaster survivors who couldn't access a FEMA newsletter or a link FEMA is providing, so they're not only disaster survivors, and sometimes that's another piece I have to remind my colleagues, yes, disaster survivors are key, public individuals we want to serve and are responsible for serving but also just anybody who wants to access FEMA information may be having barriers, and the Office of Equal Rights would be authorized to look into that for the FEMA programs and activities. Our office also helps look into problems with recipients of

federal funding. Since it's focused on FEMA programs, I'm emphasizing that here. We receive civil rights complaints through the notice. There is an email address that was added recently. We have a phone number here. And through the FEMA help line. I'm just going to make a recommendation that I would use the email address if I were choosing among the three, if that's possible, because then it's a written record of when it came in and the information about the civil rights concern

And then our office is responsible for carrying out these compliance procedure that is are set forth in our regulations. This has to do with disability-related civil rights complaints. I will tell you, though, that we are working on updating -- again, this is internally, but the idea is to strengthen everything from external programs -- our external, public-facing programs. We have a new civil rights directive that is moving through and soon to be finalized and we will have a new civil rights compliance manual that, again, will strengthen the people whose job function it is to address civil rights complaints, that document will be helpful for them. And so that is a little bit, you know, very inside baseball, but I wanted you to know that we're working on our own materials to be more effective in this civil rights compliance area.

So I think that may be my last slide. This is my contact information. My phone number and my email. And if anyone has a question or a comment, I mean, obviously we have time for questions right now, but I just wanted you to have that. Now or in the future, if you need a point of contact at FEMA on a civil rights-related issue. So Lewis, I'll have you take it from here.

>> LEWIS KRAUS: All right, Stephanie. Thank you so much. That was tremendous and a lot of information. And we have a lot of people who are really interested and have a lot of questions. So for those of you still listening, this is the time to put in your questions if you haven't already in the Chat window. And we'll get to them in a moment.

The first thing I want to point out, several were asking about putting up the 504 plan website link again. I put that up in the Chat window. So you should be able to have -- you should be able to find that. If you don't see it, scroll up and down to see it.

All right, Stephanie, the first question, you know, kind of goes timeline-wise from the beginning of your talk.

Can you say a little bit more about the disability stakeholder input that you received or engaged in in developing the plan?

>> STEPHANIE FELL: Sure. We ended up having -- it was really a conference call meeting to get different members of the disability stakeholder community engaged and to provide information. So that was one way.

We did an event with the National Council on Disability. I'm forgetting what it's called. But it's kind of like a social media event where people could provide information to FEMA through that -- through kind of an online platform one afternoon. And so those were the two main ways

during the self-evaluation that we thought -- we sought stakeholder input. Again, for the self-evaluation. This is going back a couple years.

>> LEWIS KRAUS: One person was watching what you were describing and asked about where mobility was in all of this. I think you spent a little bit of time talking about effective communication and those kinds of things, but he was asking about where is mobility?

>> STEPHANIE FELL: So mobility would come up in a lot of areas. It would come up in any facility that we're talking about. We're talking about physical access in large measure in any of our facilities. We also have an accessible meetings guidance document. Again, an internal, but that also addresses physical access. Things in the -- sort of like a temporary housing issue or a disaster recovery center, those would also have to do with providing physical access for people who need it to access a building. I'm not sure if that is what the person was asking about. And if anybody had a physical access concern, obviously they could bring a complaint to the attention of the agency as well.

>> LEWIS KRAUS: Yeah. Okay, that sounds right.

Now, on effective communication, I have a question. Have you used a script of what a speaker is saying and have a deaf person sign it in ASL and show it on the screen at the same time to ensure people who are deaf have a clear understanding of what is being said? The writer says most hearing people do not understand what a certified deaf interpreter is and needs to be included, that it may also involve a hearing interpreter working with the certified deaf interpreter.

>> STEPHANIE FELL: I'm sorry, I don't quite understand what that question is. Do you want to say it one more time, Lewis? We do have a certified deaf interpreter here at FEMA. But help me understand the question better. And if I'm able to answer it, I will. If not, I can definitely do some more and find out.

>> LEWIS KRAUS: Let me try to re-read it. So for effective communication have you used a script of what a speaker is saying and have a deaf person sign it in ASL and showing it on the screen at the same time to ensure people who are deaf have a clear understanding of what is being said? Let's start with that question and then I can tell you the point that she's making afterwards.

>> STEPHANIE FELL: Okay. I think I maybe am not quite getting it, maybe we can have a conversation -- maybe you can explain it to me, Lewis.

>> LEWIS KRAUS: It looks to me she's wanting to find out if you've got a way to test what is being done in ASL to make sure that they're doing it correct. And Debbie, write me and tell me if that's not correct.

>> STEPHANIE FELL: That's a really good question. We've had internal discussion about quality of sign language interpreters, the need for more certified deaf interpreters and how that is a better way to go, and so I know there's been a discussion about that. It's an ongoing

discussion, though, so there's nothing I wouldn't say established. I think there's just a need -- an understanding of the need for that and then the need has to be met. We recognize the certified deaf interpreter is a better way to communicate with deaf people generally. We only have -- I'll be honest, we have one person who is employed full time, but I think there's a desire to increase that number.

>> LEWIS KRAUS: Okay. Great. The next question -- and this is probably -- what you're describing is something new enough that people are wanting to sort of know how this fits with things within FEMA and Homeland Security. So one question was: How is your Office of Equal Rights distinguished from Office of Civil Rights and civil liberties insofar as civil rights enforcement is concerned?

>> STEPHANIE FELL: Okay, thanks for that question. That's a little more something that I work more closely with on a daily basis. We basically have parallel jurisdiction or authority over civil rights complaints related to FEMA. FEMA has its own authority under the Stafford Act and under 504, and because we're part of the Department of Homeland Security, that Office for Civil Rights and civil liberties has some oversight over our civil rights program, and they, too, at times receive complaints about FEMA directly and investigate them. So they're similar functions, just two different organizations, one at FEMA and one at DHS. And we work closely together on a lot of things.

>> LEWIS KRAUS: Okay. And other structural questions here, does the equal rights adviser coordinate with the Disability Integration Adviser deployed to a disaster site, are they the same person? And if not, how do they differ?

>> STEPHANIE FELL: That's a very good question. No, they're not the same person. There have been a lot of changes in FEMA, I'll just be honest, in terms of our looking at members -- for people with disabilities, there's some overlapping responsibilities between the Office of Equal Rights and the Equal Rights Adviser, and the Disability Integration Adviser, so they do work together. That working relationship is a work in progress, I would say, because of some changes internally and different ideas about roles and responsibilities, and so the difference would be that the Equal Rights Adviser, first of all, would have a broader scope of civil rights oversight, so not just for Section 504, they're also looking at any discrimination when it comes to a member of the public or any access issues, whereas disability integration would only be looking at the disability piece. And the disability integration office really -- its function is to do more the community engagement with disability stakeholder organizations. We would like to partner with them on that. Again, we're engaging broader civil rights community-based stakeholders, not just disability. Again, there's a civil rights compliance piece which only would be the Office of Equal Rights, would not be disability integration. So working closely together is something we should be doing. There's a recognition that we could do that better, so it's not the same person and we're working together at the disaster sites, making the roles clearer, even internally at FEMA there's some confusion, but we're working to address that.

>> LEWIS KRAUS: Okay. The next question has to do with this thing that you said at the beginning about not talking about the funded programs (chuckling)... so maybe we'll touch upon that.

>> STEPHANIE FELL: That's okay.

>> LEWIS KRAUS: They wanted to tell you this is an outstanding presentation on the findings of many gaps in FEMA's failure to comply with legal obligations under Section 504 for FEMA conducted activities, however, still haven't undertaken required rulemaking to meet the responsibility to establish a rule for regarding funding in programs. What is the administrator doing to establish this rule and in the absence of a rule, what might FEMA be doing to ensure that all the billions of federal funds given to others to assist FEMA must also comply?

>> STEPHANIE FELL: Right. Well, the whole rulemaking, I don't -- I don't know that I can say exactly why there hasn't been a rule. I don't really know why there are no regulations on the 504 activities in FEMA, I just know there isn't one. That doesn't mean those obligations don't exist. That's what I would say. Of course, having regulation would be helpful. I think there is some -- it's not entirely clear right now whether DHS might over time go out with its own 504 regulation that would be department-wide. I've heard that, but I really am not authorized to say exactly what is happening there. So that's one thought. I don't know exactly what the thinking internally is, but like I said, it doesn't mean there is no obligation. And so our civil rights compliance manual, the one I mentioned, and our civil rights directive, talk about assisted activities. Again, that's aimed internally for my colleagues who do the funding, and then FEMA's Office of Equal Rights would be able to -- is anticipating strengthening the ability to work more directly with recipients to train, provide technical assistance, do compliance reviews around our funded activities. And so we work with the Department of Justice because they have coordination authority under this law for both the federally conducted and federally assisted, to strengthen that capacity to work with recipients of FEMA financial assistance about their obligations. DHS also has required that recipients of FEMA or DHS assistance federal funds fill out a civil rights evaluation tool. So that's a first step in terms of getting data from recipients of the funds about what they have in place or the civil rights obligations. So that's a good data collection tool at least to see where they are. And there has been -- there have been a couple of compliance reviews over the years, but we want to be able to strengthen that. We need to be more proactive. We need to strengthen that piece in our office. There is a recognition. This 504 evaluation just didn't include that. That's why I'm not covering it. It just wasn't part of this -- the directive from DHS, but on the assisted side we're working to strengthen that and do see a need to engage directly with our recipients, training on civil rights, providing technical assistance and compliance reviews, and if needed complaint investigations.

>> LEWIS KRAUS: Okay. Great. Next question is: Is FEMA changing its policies to better serve renters in disasters? So many of the programs are directed to homeowners, and many people with disabilities rent their homes.

>> STEPHANIE FELL: Well, you know, that is a good question. That doesn't necessarily have to do with Section 504, that's more of an agency policy. I do not know the answer to that question. That doesn't mean renters can't get assistance from FEMA under the right circumstances when eligible. I hear what you're saying. I do not know the answer to the question, so I don't think I can say anything more. It is -- right now it is -- some of the

assistance is geared towards the homeowner. There is some for renters if they're eligible, but like I said, I don't have any understanding if that's going to significantly change. It's certainly not part of this 504 evaluation. So I don't have any information.

>> LEWIS KRAUS: Okay. The next person wants to know where online is a copy of the civil rights notice that can be printed out and posted in disaster recovery centers.

>> STEPHANIE FELL: You know, that is such a good question, whoever asked that, because I was looking right before we started to try to find it. And so I think it's posted -- I need to make -- I'm not sure as the notice is posted. The information is on our website. But I'm not sure it's posted on our external page yet.. I will commit to getting it posted as soon as I can. And so I'm not sure it's there right now. I could certainly send you a copy, Lewis, the you wanted to send it out to people. I'm not against providing it. It's just not posted yet.

>> LEWIS KRAUS: I think if you have it, and you want to send it to me, then everyone who is listening, I can put it up when the archive goes up.

>> STEPHANIE FELL: Perfect.

>> LEWIS KRAUS: It can be associated with the archive for this webinar, all right?

>> STEPHANIE FELL: Okay. Thanks.

>> LEWIS KRAUS: Next question: At the beginning of presentation there was discussion about making sure that public information and platforms for distribution should be accessible. Will this include the bringing back of preparedness brochures in large print and Braille?

>> STEPHANIE FELL: Well, I think those -- if someone needs that, that request should be brought to the agency. That's our responsibility. I'm not sure if there was a specific instance where a person wanted it and didn't get it. We're responsible for having that available if someone needs it.

>> LEWIS KRAUS: Okay. Next person wants to know: Can you address FEMA podcasts and FEMA Facebook Live, which are usually interviews with staff about various FEMA programs. They're audio base and some survivors have complained about their inaccessibility.

>> STEPHANIE FELL: Okay. So this is a very good example where someone has a concern but it hasn't necessarily been brought to this office. You know what I mean? It might have been brought to the podcast people. I would have to know what the concerns are, because I can't necessarily go to them unless I have something a little more specific. So if that person wants to just engage me on what the specific concerns were, I'd be happy to talk that through. The podcasts, I mean, I just don't know exactly what they are. I'm not aware of that.

>> LEWIS KRAUS: Okay. And you have Stephanie's contact right there on the screen. So go ahead and --

>> STEPHANIE FELL: Please do.

>> LEWIS KRAUS: -- send that to her. Does FEMA have a team to assist medically vulnerable older adults in disasters? I'm concerned about access to medication and medical devices, like, for example, oxygen or insulin.

>> STEPHANIE FELL: Well, obviously there's a lot of interest in this subject. There isn't a special team for that, no. Just remember that FEMA comes in if the state invites us in. It's really all the emergencies administered by the local and then the county and state emergency managers. So what FEMA can do really is we come in to support and we can help support what the needs of the community are when they're -- you know, when they say, we need help with X. So, for example, in Puerto Rico, in the end FEMA ended up delivering generators because people are electricity dependent. So it wouldn't necessarily be FEMA leading that. It would be a request from the state for FEMA's assistance on it. There is a recognition, obviously, that we need to be better able to address those needs. And one of the ways we do that is through the preparedness side of house. So working with communities to talk about things like getting prescriptions, making plans, things like that. So that is where FEMA's function would come in around supporting them and then we support the state and locals to meet those needs. But there is no specific team, no, focused on that.

>> LEWIS KRAUS: Okay. I'm not sure if this is one that is in your -- that relates to what you're talking about today, but maybe you can answer it. What type of temporary housing is available today for those with disabilities, including mobility devices and those with developmental and intellectual disabilities?

>> STEPHANIE FELL: Well, I will say that housing -- again, this is only if the place where the disaster occurred is eligible for FEMA temporary housing. So there's -- it's not automatic. And then the family itself has to be eligible for the temporary housing. So we have manufactured housing units. We have ones that are accessible under the uniform federal accessibility standard. That's the HUD standard for housing. So that would be one option. It depends on what the needs of the family are. There are other options that we're looking -- we've used RVs. We've used actually leased facilities. There may be others. I mean, it does change. There's sort of a menu of options depending on what is going on in the place. Sometimes we actually build structures. And so depending upon what would work well in that area and then what the needs of that family are, we would try to tailor that temporary housing unit solution to best meet the needs of the person. So if someone needed -- used a wheelchair or uses a wheelchair, a manufactured housing unit that is uniform federal accessibility standard built to those specifications might be the best option if that would fit on their property. There are a whole bunch of other considerations. So it's really much more individual. So I can't really say, you know, we have to see what the units we're using in that area are and then what the family's needs are and make those two match, basically.

>> LEWIS KRAUS: Okay. Next question is: Does this 504 disability discrimination also apply towards education?

>> STEPHANIE FELL: What kind of education? Courses... I'm not quite sure.

>> LEWIS KRAUS: Yeah. If you're still on the call, can you clarify which education you're referring to here in your question? Thanks. In the meantime we have a clarification of the interpreter question from earlier.

>> STEPHANIE FELL: Yeah, that's great.

>> LEWIS KRAUS: Certified interpreters are not the only way to communicate what is being said. Sometimes we need to look at alternative solutions for webcasts to use deaf people and ASL to communicate clearly. Often certified deaf interpreters work with a hearing interpreter in situations. So it is not just a certified deaf interpreter working alone with the speaker. The way it's described it appears Stephanie was saying a certified interpreter works alone with a speaker instead of explaining more fully that certified deaf interpreters work with make communication clear for a deaf audience.

>> STEPHANIE FELL: Yeah, I have some communication access colleagues who would be better equipped to answer that question. I apologize for not understanding.

>> LEWIS KRAUS: Okay. Looks like we have a couple more questions. Is FEMA doing anything to close the gap between ESF 6 -- okay, so we'll have to clarify for everybody -- ESF, so everybody understands what we're talking about -- ESF 6 and 8 and withholding reimbursement from HHS when they fail to comply with the Rehabilitation Act or issue waivers to lead states to believe they can institutionalize disaster impacted people?

>> STEPHANIE FELL: I'm aware of the reports that have come out about this issue. I don't -- I don't have anything specific to -- I mean, the only thing we're doing around ESF 6 and 8 is more about strengthening the functional needs support services guidance and this hopefully would address some concerns that have been raised around taking people out of a group -- you know, a congregant shelter, general population shelter. It's a good question, but right now there's nothing about withholding reimbursement from HHS that I am aware of.

>> LEWIS KRAUS: And interestingly, here is a question for you from someone who wrote in and said: Did you hear any comments regarding LGBTQIA? Unfortunately, they've heard stories regarding shelters over the years.

>> STEPHANIE FELL: I'm more disability focused, but, I mean, that would be something for the Office of Equal Rights. I personally am not aware of that, but that would be a concern that I would say should definitely be brought to the attention of our office.

>> LEWIS KRAUS: All right. Very good. Well, we realize that many of you still may have questions for Stephanie and apologize if you didn't get a chance to ask a question. You can contact her there at her contact information, or if your question is really an ADA kind of question, you can contact your regional ADA Center at 1-800-949-4232. You'll receive a link with online session evaluation. Please complete that evaluation for today's program as we value your input and want to demonstrate the value of it to our funder. We want to thank Stephanie today for sharing her time and knowledge with us. And a reminder that today's

session was recorded and it will be available for viewing next week at ADApresentations.org in the archives section of the emergency management portion.

Our next webinar will be January 9th in the new year and we will be finally rejoined by our earthquake country alliance people to pick up the webinar that got postponed from last month on earthquake preparedness for emergency managers and people with access and functional needs. And we hope that you can join us. Don't think that you're in an area that doesn't have an earthquake and you shouldn't listen. It might be important for you anyway.

So watch your email two weeks ahead of time for an announcement of the opening of that registration.

So thank you all for attending today's session. Thank you again, Stephanie, for your time and your great presentation. And we look forward to seeing you all again in January. Have a good day, everyone!