LAHD

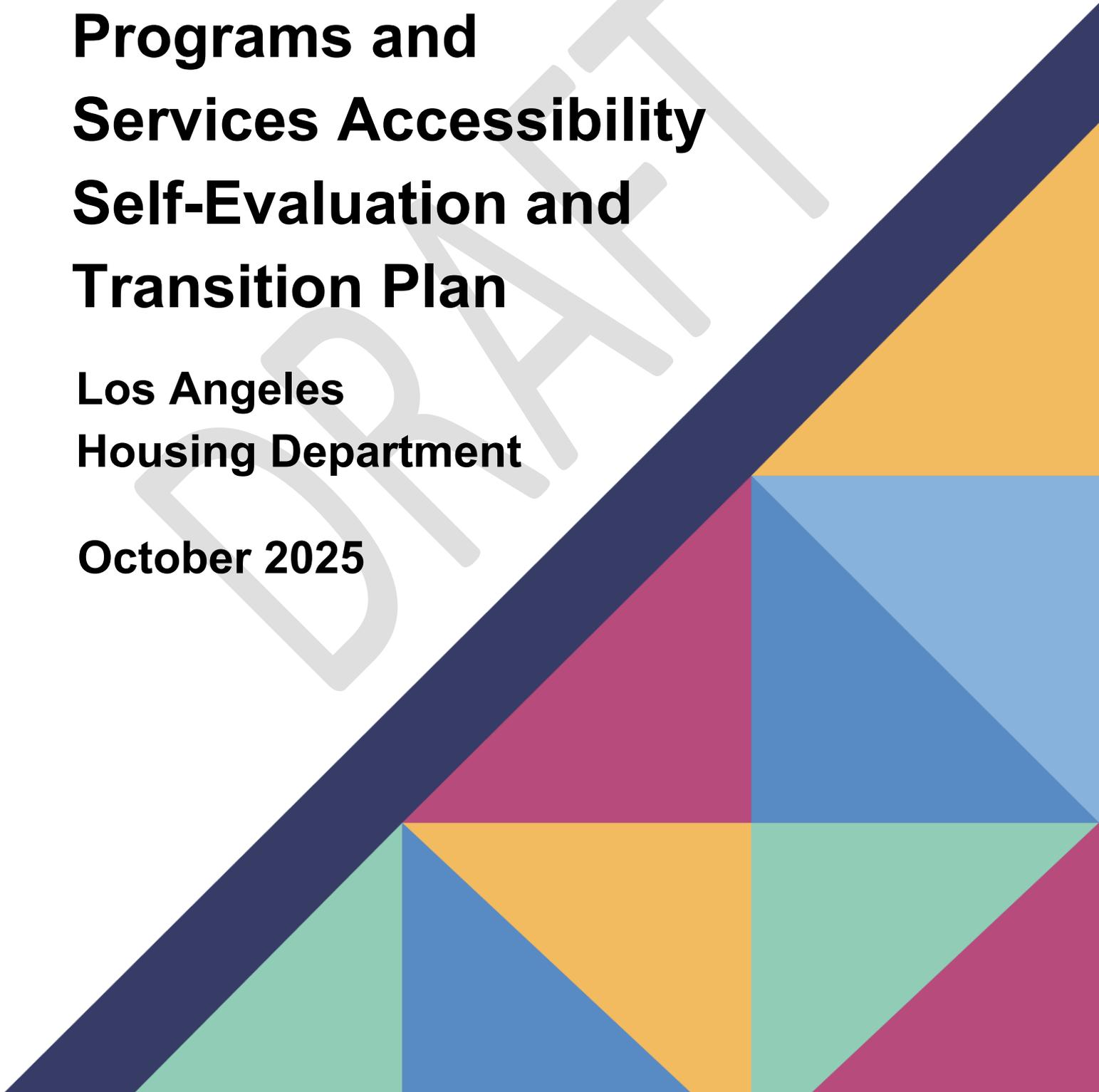**LOS ANGELES HOUSING DEPARTMENT**

Programs and Services Accessibility Self-Evaluation and Transition Plan

Los Angeles Housing Department

October 2025

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REGULATIONS

Section 504 of the Rehabilitation Act of 1973 is a federal law that prohibits discrimination against people with disabilities in programs and activities that receive federal funding. Title 24 of the Code of Federal Regulations (CFR) Part 8 is the set of rules and regulations issued by the Department of Housing and Urban Development (HUD) to effectuate Section 504 so that no otherwise qualified individual with a disability shall, solely by reason of their disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Title 24 Part 8.51 requires recipients of federal HUD funds, such as cities, to conduct accessibility self-evaluations which evaluate current policies and practices and to take appropriate corrective steps to remedy any issues revealed by the self-evaluation.

Some of the key requirements of Part 8 of Title 24[1] include:

- Nondiscrimination: Prohibits discrimination on the basis of disability in programs and activities receiving federal financial assistance. Recipients may not deny, limit, or provide unequal and ineffective services to persons solely on the basis of disability.

- Effective Communication: Mandates effective communication with applicants, beneficiaries, and members of the public, including the provision of auxiliary aids. Recipients shall implement procedures to ensure that persons with vision and hearing disabilities can obtain information and access services.

- Employment Nondiscrimination: Prohibits discrimination in employment. Recipients may not limit, segregate, classify, or discriminate against employees in ways that affect their opportunities, solely on the basis of disability. Discrimination is prohibited in

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[1] eCFR – Code of Federal Regulations, Title 24 Part 8, https://www.ecfr.gov/current/title-24/subtitle-A/part-8, retrieved August 2025.

recruitment, advertising, hiring, promotions, transfers, terminations, pay, job assignments, benefits, training, and more. Recipients must also provide reasonable accommodations to applicants and employees with disabilities, unless the recipient can demonstrate that the accommodation would impose an undue hardship on the operation of its program.

- Reasonable Accommodation: Requires recipients of federal funds to provide reasonable accommodations to persons with disabilities, unless the recipient can demonstrate that the accommodation would impose an undue hardship on the operation of its program. Reasonable accommodations may include making facilities accessible.

- Program Accessibility: Ensures that programs and activities receiving federal funds, including non-housing facilities, are accessible to persons with disabilities. Recipients are not necessarily required to make each facility accessible, as long as each program or activity are readily accessible to, and usable by, persons with disabilities. Recipients may implement their programs or services in accessible portions of facilities, assign aides to persons, conduct home visits, add or redesign equipment, or make changes to policies and procedures.

- Design and Construction: Requires newly constructed multifamily housing to be designed and constructed to be accessible to individuals with disabilities. Prescribed minimum numbers/percentages of units shall be made accessible for persons with mobility impairments and for persons with hearing/vision impairments.

- Self-Evaluation: Recipients must conduct self-evaluations of their policies and practices to ensure compliance, modify any policies and practices that do not meet the requirements, and take corrective steps to remedy any discrimination revealed by the self-evaluation.

Recipients must maintain on file, for at least 3 years, a list of the persons/parties consulted, a description of areas examined and problems identified, and a description of any modifications made and remedial steps taken.

- Transition Plan: Recipients shall develop a transition plan, setting forth the steps to complete necessary structural changes to facilities. The plan shall identify the physical accessibility obstacles, describe the methods/steps to be taken, and specify the schedule to achieve compliance. The plan shall be developed with the assistance of interested persons, identify the official responsible for implementation, and be made available for public inspection.

- Responsible Employee and Grievance Procedures: Recipients shall designate at least one employee to coordinate its compliance efforts. Recipients shall also adopt grievance procedures that incorporate appropriate due process standards and provide for the prompt and equitable resolution of complaints.

- Notice: Recipients shall take steps to notify persons, including those with impaired vision or hearing, that it does not discriminate on the basis of disabilities. A statement, indicating such, shall be included in the recipient's publications and recruitment materials. Persons, including persons with disabilities, shall be provided with the information necessary to understand and participate in the recipient's programs. Examples of methods to ensure participation include, but are not limited to, sign language and oral interpreters, readers, Braille, and taped materials.

The Americans with Disabilities Act (ADA) is a civil-rights law that mandates equal opportunity for individuals with disabilities and guarantees that they have the same opportunities as everyone else to participate in mainstream life: to enjoy employment opportunities; purchase goods and services; and participate in state and local government programs and services. Title II of the ADA requires that state and local governments make

all programs and services accessible to people with disabilities. Section 35.105 requires public entities, such as cities, to conduct accessibility self-evaluations of its current services, policies, and practices and develop transition/action plans to ensure they meet the requirements of the ADA.

Some of the key requirements of Title II[2] include:

- Employment Nondiscrimination: Individuals with disabilities shall not, solely on the basis of disabilities, be subjected to discrimination in employment under any service, program, or activity conducted by public entities.

- Program Accessibility: Public entities must ensure that their programs, services, and activities are accessible to individuals with disabilities.

- Service Animals: Generally, public entities shall modify policies, practices, or procedures to permit the use of a service animal by an individual with a disability, unless the animal is out of control or not housebroken.

- Mobility devices: Public entities shall permit the use of wheelchairs and manually-powered mobility aids, such as walkers, crutches, canes, etc., in any areas open to pedestrian use. Individuals with disabilities shall also be permitted to use power-driven mobility devices unless determined that operation of a device creates legitimate safety risks. Legitimate safety requirements may be imposed, if necessary for safety.

- Reasonable Modifications: Public entities are required to make reasonable modifications to their policies, practices, or procedures when necessary to avoid discrimination on the basis of disability,

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[2] Americans with Disabilities Act (ADA), Title II, https://www.ada.gov/law-and-regs/regulations/title-ii-2010-regulations/, retrieved August 2025.

unless making the modifications would fundamentally alter the nature of the service, program, or activity.

- Design and Construction: Facilities constructed for the use of public entities shall be designed and constructed so that the facilities are readily accessible to individuals with disabilities, unless it is demonstrated that it is structurally impracticable to meet the requirements.

- Effective Communication: Public entities must ensure effective communication with individuals with disabilities, and their companions with disabilities, and furnish appropriate auxiliary aids and services where necessary to afford individuals an equal opportunity to participate in, and enjoy the benefits of, services, programs, and/or activities.

- Telecommunications: If public entities communicate by telephone with applicants and beneficiaries, text telephones (TTYs) or equally effective telecommunications systems shall be used to communicate with individuals who have hearing or speech disabilities.

- Web and Mobile Accessibility: Public entities shall ensure that web content and mobile apps are readily accessible to individuals with disabilities. Alternative designs, methods, or techniques than those prescribed in Title II may be used, if they result in substantially equivalent or greater accessibility and usability of the web content or mobile apps.

- Integration: Public entities must administer services, programs, and activities in the most integrated setting appropriate to the needs of individuals with disabilities. This means avoiding unnecessary segregation of individuals with disabilities.

- Maintenance of Accessible Features: Public entities must maintain accessible features of facilities and equipment in working order.

- No Surcharges: Public entities cannot place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of measures required to provide nondiscriminatory treatment.

- Self-Evaluation: Public entities shall evaluate their services, policies, and practices, and proceed to make any necessary modifications to meet ADA requirements. Interested persons, including individuals with disabilities or organizations representing individuals with disabilities, shall have an opportunity to participate in the process by submitting comments. Descriptions of the process and modifications shall be maintained on file for at least three years.

- Transition Plan: If structural changes to facilities will be undertaken to achieve program accessibility, a transition plan shall be developed setting forth the steps necessary to complete such changes. Interested persons, including individuals with disabilities or organizations representing individuals with disabilities, shall participate by submitting comments and a copy of the transition plan shall be made available for public inspection.

- Notice: Public entities shall make available to applicants, participants, beneficiaries, and other interested persons, information regarding the provisions of Title II and its applicability to their services, programs, or activities.

- Responsible Employee and Grievance Procedures: Public entities shall designate at least one employee to coordinate efforts to comply with, and carry out, these responsibilities. Grievance procedures shall be adopted and published, providing for prompt and equitable resolution of complaints alleging any action that would be prohibited.

CITY OF LOS ANGELES – FACTS AND FIGURES

The City of Los Angeles, founded in 1781 and incorporated as a U.S. city in 1850, is the most populous city in the state of California. With a land area of 469 square miles, Los Angeles has a population of nearly 3.9 million per the latest census numbers. Per the 2020 Census and 2023 American Community Survey estimates[3]:

- Approximately 47% of the population are Hispanic or Latino; 29% are non-Hispanic White; 12% are Asian, 8.6% are Black, and 1.6% are Native American
- Over 56% of the population speak languages other than English at home, with 39% speaking Spanish
- Over 35% of the population are foreign-born
- Over 14% of the population are 65 years and older
- Over 14% of the population live in poverty
- Nearly 65% of occupied units are renter-occupied
- Over 11% of the population have disabilities

Per the Los Angeles County Aging & Disabilities Department, 2022 American Community Survey estimates indicate Los Angeles County residents live with the following types of disabilities[4]:

- Ambulatory difficulty – 5.4%
- Independent living difficulty – 4.5%
- Cognitive difficulty – 4.5%
- Hearing difficulty – 2.9%
- Self-care difficulty – 2.5%
- Vision difficulty – 2.2%

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[3] US Census Bureau, Los Angeles city, California, https://data.census.gov/profile/Los_Angeles_city,_California?g=160XX00US0644000, retrieved August 2025.
[4] Aging & Disabilities Department, Los Angeles County https://ad.lacounty.gov/wp-content/uploads/2025/07/Disability-Pop-by-Type-of-Disability.pdf, retrieved October 2025.

LOS ANGELES HOUSING DEPARTMENT – BACKGROUND

The City of Los Angeles established the Community Development Department (CDD) in 1976 to implement human services, housing and community development programs funded by the Community Development Block Grant (CDBG). In 1990, the Housing Preservation and Production Department (HPPD) was created as a spin-off from CDD and took over the oversight of CDD's housing programs including rent stabilization, homeowner rehabilitation loans, asset management, and more. HPPD changed its name to the Los Angeles Housing Department (LAHD) in 1993.

In 2012, due to the dissolution of Redevelopment Agencies in California, the Community Redevelopment Agency of Los Angeles (CRA/LA) was dissolved and CRA/LA's housing assets were transferred to the City (LAHD).

LAHD strives to position Los Angeles as a city where no individual is excluded, solely on the basis of disability, from participating in, and/or benefitting from, services, programs, and activities; a city where all Angelenos are able to have a safe and affordable place to call home, by producing, preserving, and protecting safe and affordable housing for all Angelenos in all neighborhoods.

LOS ANGELES HOUSING DEPARTMENT - ORGANIZATION

LAHD is composed of three Bureaus and an Executive Office:

REGULATORY CODE AND COMPLIANCE BUREAU (RCCB)

RCCB administers citywide programs that impact habitability and rental conditions for the City's multi-family rental housing stock and works to ensure that tenants and landlords know their rights and operate in

accordance with their responsibilities. RCCB comprises the Rent Stabilization Division, the Code Enforcement Division, and the Compliance Division.

The Rent Stabilization Division administers and enforces the Los Angeles Rent Stabilization Ordinance (RSO) and Just Cause Ordinance (JCO). The RSO was adopted by the Los Angeles City Council in 1979 to protect tenants from excessive rent increases and arbitrary evictions, while providing landlords with a fair return on their investment in their rental housing properties. The JCO, adopted in 2023, covers most residential properties in Los Angeles not regulated by the RSO and prohibits terminations of tenancies without just cause and requires relocation assistance for no-fault evictions. The Rent Stabilization Division manages Case Analysis, Investigation and Enforcement, Landlord Declarations, Rent Registry, Tenant Buyout, Rent Stabilization Ordinance Determinations, Tenant Anti-Harassment, Eviction Notice Filing Program, Rent Adjustment Commission Support, Eviction Defense Program, and Customer Service Hotline and Public Counters.

The Code Enforcement Division administers and enforces the Housing Code and several programs that support safe and livable neighborhoods in Los Angeles. These programs include the Systematic Code Enforcement Program (SCEP), the Complaint Inspection Program, the Tenant Relocation Assistance Program, the Primary Renovation and Tenant Habitability Program, the Urgent Repair Program, and the Residential Hotel Program. To address unique and special enforcement concerns, the Division has also created a variety of workgroups including the HOME Unit, the Specialized Enforcement Unit, the Court Liaison Unit, the Emergency Management Unit, and the Inter-Agency Housing Task Force. Collectively, these programs and workgroups enable LAHD to deliver vital services across the City that protect rental housing occupants from unsafe living conditions in the City's rental housing units.

The Compliance Division administers the Rent Escrow Account Program (REAP), Legal, and Foreclosure Registry programs, conducts General Manager (GM) hearings and supports Appeals Board hearings, and oversees the billing and collections of various legally mandated fees which support these programs. In addition, the Foreclosure Registry also takes a multi-faceted approach to this work and collaborates with lenders and other City agencies to abate nuisances from properties in foreclosure. In enforcing and administering these programs, blight is removed from communities, which ensures that rental properties are free from danger and/or risk to the residents of Los Angeles.

HOUSING DEVELOPMENT BUREAU (HDB)

HDB facilitates the financing of affordable housing development projects with LAHD's development partners. Using federal, state, county, and local funding resources, HDB assists with the building and preservation of housing by leveraging funds, such as capital subsidy and tax-exempt finance bonds, with private investments in order to meet the City's housing needs. The Bureau also administers a variety of programs and services available to low-income and very low-income residents and first-time home buyers.

The Development and Finance Division is responsible for affordable multifamily housing production and preservation activities in the City. The Division manages the City's Conduit Bond Program, Affordable Housing Managed Pipeline, Proposition HHH Permanent Supportive Housing Loan Program, and Affordable Housing Preservation program.

The Technical Services Division is responsible for providing technical services to the Bureau including construction monitoring, state Prevailing Wage and federal Davis Bacon compliance monitoring, relocation compliance monitoring, and environmental reviews. The Division is also responsible for administering LAHD's Handyworker Program.

The Asset Management Division provides loan servicing and management for LAHD's loan portfolio, consisting of thousands of loans and covenanted affordable single-family and multi-family housing units. The Occupancy Monitoring section monitors properties in the LAHD portfolio to ensure that tenant incomes and rents meet regulatory requirements.

The Housing Innovation Strategies Division manages the Project Homekey initiatives, leads the implementation of new strategic initiatives and manages long-standing housing services such as Homeownership Loans, Land Development, Housing Strategies, Neighborhood Initiatives, and Affordable Housing & Sustainable Communities. The Division also oversees the 710 Gateway, USC Housing Fund, ADU Accelerator, and Naturally Occurring Affordable Housing efforts.

ADMINISTRATION BUREAU

The Administration Bureau manages a range of services to support LAHD operations. The Bureau is organized into three Divisions - Accounting, Systems, and Administrative Services - which provide Department-wide services in the areas of accounting, budget management, information technology, homeless services oversight, grants management, purchasing, records management, contract management, and facilities management. The Bureau also liaises with other City Departments, such as the Controller's Office, Information Technology Agency (ITA), City Attorney, and City Administrative Officer (CAO).

The Administrative Services Division consists of the Budget section, which handles LAHD's budgeting process, including the submission of the Departmental budget, Financial Status Reports and funding, and account analysis; the Contracts and Procurement team, which is responsible for overseeing the procurement of services for LAHD and execution of the resulting contracts and amendments; the Management Services section, which oversees purchasing and facility services as well as requests from the public involving the California Public Records Act (CPRA); the Grants section, which assists program staff with applications, budget development,

monitoring, and compliance for grant-funded programs; and the Homeless Services section which includes the administration of LAHD's Los Angeles Homeless Services Authority (LAHSA) and Housing Opportunities for Persons with AIDS (HOPWA) contracts.

The Accounting Division is responsible for LAHD's financial transactions and reporting, fund management, overseeing loans and payments due to LAHD, accounting services, invoice processing, grants accounting, and fiscal auditing of contractors. The Division is responsible for management of payroll/Workday (the recently implemented human resources and payroll management system), completion of confirmation requests from loan borrowers, and review and verification of borrowers' Financial Statements of Residual Receipt loans.

The Systems Division ensures the smooth operation and enhancement of LAHD's critical IT infrastructure and business systems to support legal mandates, ordinances, operational needs, and public services.

EXECUTIVE OFFICE

The following sections are included within the Executive Office:

The Strategic Engagement and Policy (SEP) team works with all LAHD Bureaus and Divisions to evaluate, communicate, support, and advance the Department's mission. SEP is responsible for drafting and reviewing policy; compiling, reviewing, and analyzing data strategically; communicating LAHD's message effectively and efficiently to both internal and external audiences; and coordinating LAHD emergency planning, training, and response and recovery activities. Key areas of work include: implementation support for United to House LA (ULA), performance analysis, research on fair housing and homelessness, public information and media response, accessibility evaluation and document remediation, management of housing-related emergency incidents, and legislative/government relations.

The Accessible Housing Program (AcHP) ensures that multifamily affordable housing, constructed with the assistance of the City and/or the former CRA/LA, is accessible to people with disabilities. AcHP was established in 2016 to ensure the City's compliance with, and implementation of, the Settlement Agreement (SA), entered into with Independent Living Center of Southern California (ILCSC), et. al., and compliance with the 2019 Voluntary Compliance Agreement (VCA) with HUD[5]. Housing properties in the LAHD portfolio are covered by these agreements (Covered Housing Developments).

The Amended Corrected Settlement Agreement and Voluntary Compliance Agreement (ACSA/VCA) require new construction, substantial rehabilitation, and retrofitting of existing units in the LAHD portfolio to ensure mobility and hearing/vision accessible units. The ACSA/VCA also require specific percentages of mobility and hearing/vision accessible units in housing developments in the LAHD portfolio. Developments must also adopt, implement, and maintain compliance with rental occupancy policies that apply fair housing laws for persons with disabilities to affordable rental housing.

AcHP –

- ensures that new construction, substantial rehabilitation, and retrofit of covered housing, complies with applicable local, state, and federal accessibility standards;
- manages the Accessible and Affordable Housing Registry where Angelenos can view and enter information to join any open waiting list of affordable housing developments;
- monitors covered housing developments to ensure compliance with accessibility and nondiscrimination requirements;
- assists applicants and tenants in covered properties with grievances;

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[5] The SA and VCA contain similar provisions and will be referred to as the Amended Corrected Settlement Agreement and Voluntary Compliance Agreement (ACSA/VCA) when those provisions are the same.

- conducts required training for owners and property management staff; and
- works with the Los Angeles Homeless Services Authority (LAHSA) to ensure appropriate matches are made and units are filled with persons with disabilities who are experiencing homelessness and are in need of the accessible features.

DEPARTMENT ON DISABILITY – EVALUATION OF LAHD OFFICES

As mentioned above, regulations require facilities used by public entities to provide programs and services to the public to be accessible to persons with disabilities. Over 2024 and 2025, the City's Department on Disability (DoD) has been in the process of scheduling and conducting physical accessibility evaluations of city department office/facility locations as part of a citywide evaluation. For much of 2024 and the first half of 2025, much of LAHD staff had very limited, or no, office space. That situation notwithstanding, LAHD coordinated with DoD and DoD's Certified Access Specialist (CASp) contractor to conduct site visits at LAHD office locations, with a focus on viewing, measuring, and assessing areas open to the public, including public counter spaces.

DoD indicates that, after an internal review of data collected by the CASp, a data report will be prepared and presented to LAHD. It is expected that the report will list any existing concerns or gaps and will assist in identifying proposed correction actions. It is important to note that LAHD does not own or operate buildings. LAHD offices are located in leased office spaces. Any suggested physical changes, identified as part of a DoD list of action items, must be coordinated and addressed through the city's General Services Department (GSD), which coordinates leases and construction with private office building owners/operators. A separate transition plan will be drafted, in coordination with DoD and GSD, if any needed structural changes are identified by the CASp.

LAHD PROGRAMS AND SERVICES – SELF-EVALUATION

No one should be prevented from having access to LAHD programs and services due to a disability. LAHD has undertaken the process to conduct an internal "programs and services" self-evaluation with the intent to develop and implement a transition plan with actions to address identified accessibility improvements.

SELF EVALUATION – A DELIBERATIVE PROCESS

The Self-Evaluation process began with LAHD Bureau/Division management identifying key staff heading each of their programs and services. These staff members were contacted and virtual appointments were scheduled to introduce the SETP process. From July 2024 through October 2024, virtual discussions were held with representatives of 77 programs/services. A few programs and services were combined for efficiency purposes. Discussions were conducted, prompting staff to participate in the questionnaire-style deliberative process using the 33 accessibility questions listed below. The process was introduced as a safe no-fault environment, to encourage open and honest participation and feedback. Questions were clarified and support was provided throughout the process. By the end of 2024, feedback was received from all identified sections. Feedback and comments were captured and analyzed to highlight strengths and areas for improvement, including topics where staff made recommendations or indicated a need or desire to receive further guidance and training.

It is important to note that some LAHD programs and services engage directly with the public to a greater degree and/or provide information to the public more frequently. Examples include the LAHD Customer Service Public Counters and Telephone Hotline which are staffed by the Rent Stabilization Division and provide information about the Rent Stabilization Ordinance, tenant and landlord rights and responsibilities, code

enforcement, referrals to fair housing resources, and are available to Angelenos to discuss their housing-related matters. The Systematic Code Enforcement Program (SCEP) inspects the City's residential rental properties on a multi-year cycle to ensure compliance with State and local health and safety codes to remedy and prevent dangerous, substandard, unsanitary, and deficient living conditions for the city's renters. The Communications & External Affairs Team is responsible for media response, community engagement, external relations and outreach, social media, LAHD newsletter, branding and visual identity, coordination on document accessibility remediation, and more.

ACCESSIBILITY ASSESSMENT QUESTIONS

LAHD identified over 30 questions to gauge program accessibility:

1. Do department staff and contractors advertise to, interact with, and/or provide program services or information to the public?

2. Are department staff and contractors aware of accessibility requirements/responsibilities? Is this mentioned in contracts and/or other documentation?

3. Do department staff and contractors understand any specific program funding source requirements (e.g. federal funding requirements) re: clientele who must benefit from this program?

4. Does the program design and its policies, codes, and rules exclude, limit, restrict, or discriminate against participation by persons with disabilities and/or access and functional needs?

5. Are there any potential circumstances or practices within the program which could limit/restrict the participation of a person with disabilities and/or access and functional needs?

6. Are IT/Systems staff, department staff, and contractors, who are responsible for web page and content development, aware of accessibility requirements?

7. If program information is provided in digital format, online and/or in video form, by department staff or contractors, is the content and format checked for accessibility? Tested for compliance with accessibility standards? Screen reader readability? Use of captions? Color contrast? Can information be provided in alternative format/language, if requested?

8. Is there a plan/policy on how to ensure web pages remain accessible and compliant? A plan to ensure new content is tested for accessibility?

9. Are materials - such as fliers, brochures, notices, letters, and other printed documents - provided by department staff and/or contractors, checked for accessibility? Color contrast? Font type and size? Can information be provided in alternative format/language, if requested? Braille? Large print? Electronic format, for screen readers?

10. Is notice provided, online and/or on printed materials, that the department does not discriminate on the basis of disability? Does the notice explain the process to request reasonable accommodations, such as sign language interpretation and materials in alternative formats, and the availability of accessible digital content?

11. Is program eligibility and "how to apply" information available in various formats? Are multiple options available for the public to sign up/apply for the program and submit any required information or documentation? Can application materials be available in alternative formats/languages, if requested?

12. Are multiple options available for the public to speak with staff, make appointments, and/or obtain more information?

13. Is contact information listed on program materials and online? For persons who may need or use TTY, is information advertised on how to contact program staff via 711 and other telecommunication relay services (TRS)?

14. When communicating with the public via phone, do department staff and contractors know how to handle TTY/TRS calls?

15. Do staff know how to use virtual remote interpretation (VRI) services to access immediate virtual sign language interpretation, if needed?

16. When advertising presentations, meetings and training sessions, do department staff and contractors include information for the public on how to request reasonable accommodations, if needed?

17. When interacting with the public in-person, via phone, virtually/online, and/or in written form, are department staff and contractors aware of appropriate protocols and etiquette regarding what can and cannot be asked with regards to accessibility/accommodation needs and requests?

18. Do department staff and contractors have policies and procedures to handle and address requests for reasonable accommodations? Do they include "reasonableness" considerations, such as undue financial and administrative burden or fundamental alteration of the program/service?

19. Are department staff and contractors aware of reasonable accommodation policies and considerations?

20. Do department staff and contractors know they may not charge persons with disabilities to cover the costs of measures necessary to ensure nondiscriminatory treatment, such as the fulfillment of reasonable accommodation requests?

21. Are department staff and contractors aware of how to handle requests for in-person Sign Language Interpreters and Communication Access Realtime Translation (CART) services? Do staff know how to arrange for the services to be available?

22. Are department staff and contractors aware of how to handle requests for other auxiliary aids, such as assistive listening devices? Do staff know how to arrange for the aids/devices to be available?

23. Are department staff and contractors aware that persons with mobility disabilities may use wheelchairs, scooters, canes, and other manually-powered mobility devices? Power-driven mobility devices may also be used, unless determined they cannot be operated safely and create a danger to others.

24. Are department staff and contractors aware of service animal policies?

25. For online/virtual meetings, presentations, and training sessions, are department staff and contractors aware of the application/software accessibility functions? Do staff provide information on the software's accessibility features to attendees at the beginning of each session?

26. When setting up in-person presentations, meetings, and training sessions, do department staff and contractors assess the physical accessibility of the locations?

27. When providing/delivering services, are department staff and contractors able to accommodate the manner and/or location of service delivery?

28. Are alternative options available for the public to submit documentation, including signatures, and conduct transactions, such as payment of funds?

29. Is there a procedure to receive accessibility-related complaints? Is there a grievance procedure? Does it provide a review process and timelines? Are department staff and contractors aware of the procedure?

30. Is the public informed of the complaints/grievance procedure?

31. Is an accessibility evaluation of the program's physical sites, such as public counters, being conducted?

32. Do department staff and contractors know who to ask for help and/or guidance if they do not know how to handle a certain accessibility matter/concern? Is there a process to elevate and/or refer questions/concerns so they are addressed timely?

33. Do department staff and contractors receive training on etiquette, language, ADA requirements, and disability awareness?

STRENGTHS

The feedback and comments received from LAHD staff indicate strengths in accessibility awareness within their programs and the services they offer.

Key strengths to highlight include LAHD's implementation of the ACSA and VCA which contain requirements for mobility and hearing/vision accessible units; rental occupancy policies; training for owners and property management personnel; and program monitoring. Affordable housing owners and property managers are provided technical assistance and training on accessibility requirements and the protocols and etiquette regarding what can and cannot be asked with regards to accessibility accommodations. AcHP inspectors also ensure that architectural plans and construction of affordable housing projects meet accessibility standards.

Staff indicate they have received CommonLook software training to remediate documents and utilize a contractor to translate documents into the languages spoken at home by Angelenos. Systems staff continuously

check accessibility of LAHD internet and intranet sites. Multiple options are available for the public to interact with LAHD, to obtain program information, ask questions, complete forms, and submit documentation or payments, including by mail, phone, email, online portal, or in person and ASL and other language interpreters are obtained for virtual and in-person events. Public counters also include stations designed to be accessible for mobility devices, such as wheelchairs.

APPENDIX A of this document includes an expanded list of identified strengths.

AREAS IN NEED OF IMPROVEMENT

Despite the positives listed in the section above, a number of areas for improvement have been identified. In many cases, the same items identified as strengths by one unit, are the areas identified as in need of improvement by another unit. Staff comments also indicate the desire to have access to more accessibility-related training and to be provided with more guidance resources on most of the topics discussed. In other words, even where strengths were identified, no (or very limited) department-wide guidance or routine training schedule were found addressing accessibility requirements and practices.

Key weaknesses or areas for improvement include staff uncertainty if LAHD has an established department-wide process to test documents for accessibility; and despite training on document remediation, non-Systems staff express difficulty in remediating PDF documents. Some staff are not sure how to arrange for ASL or CART services, how to use VRI, how to assess physical accessibility at meeting locations, or how to identify accessibility features of virtual meeting applications, such as Google Meet and Zoom.

There is also a lack of clarity, and no set schedule, on guidance or training for staff and contractors regarding accessibility responsibilities and requirements, including on reasonable accommodation policies, service

animal policies, and appropriate protocols and etiquette regarding what can and cannot be asked with regards to accessibility and accommodations. There is no apparent common or official department-wide procedure to elevate accessibility-related concerns or receive complaints; and a department-wide grievance policy does not exist.

APPENDIX B of this document includes an expanded list of identified areas in need of improvement.

CATEGORIES

In light of the varied items in need of improvement, the questionnaire/discussion questions were grouped into categories, to better analyze and prioritize recommended action items. These categories assisted in determining the types of resources and efforts needed to improve accessibility:

- General Accessibility Rights, Disability Discrimination, Service Animals, and Reasonable Accommodations (including Policies)

- Effective Communication, Appropriate Etiquette, Sign Language Interpretation, CART, VRI, other assistive aids, and TTY calls

- Accessibility of Digital/Web Content and Printed Materials, including Document Remediation, Documents in Alternative Formats and Other Languages, and Required Language and Notices on Documents

- Available options/methods for the public to apply for programs, communicate, and obtain information and services

- Meeting Accessibility Considerations (virtual and in-person)

- Grievance Policy, Complaints, and requesting further assistance

TABULATION AND PRIORITIZATION

While a number of strengths were highlighted by most department work units, there is inconsistency in accessibility awareness, processes, or commonly used guidance resources throughout the department.

Most work units - some to a greater extent - interact with external persons and entities, such as tenants, landlords, managers, developers, lenders, non-profit organizations, homebuyers, real estate agents, contractors, corporations, attorneys, other government agencies, elected officials, the media, and more. Whether these entities are direct recipients of department program assistance and services or are business and coordination partners, LAHD does not appear to have a widely known or established process to incorporate accessibility considerations into all interactions, across all units, and across all methods of communication.

After tabulating the feedback and comments, based on the categories listed above, the results were prioritized as follows:

PRIORITY #1

Category: Effective Communication, Appropriate Etiquette, Sign Language Interpretation, CART, VRI, other assistive aids, and TTY/TRS/711 calls.

Approximately fifty-one percent (51%) of feedback responses and comments in this category were in the negative, indicating a high need for action items to improve the department's awareness and implementation of these efforts and requirements:

- Staff and contractor awareness of web page and content development accessibility requirements

- Staff and contractor knowledge and handling of TTY/TRS calls, including use of 711

- Staff knowledge and use of virtual remote interpretation (VRI) services to access immediate virtual sign language interpretation

- Staff and contractor awareness and use of protocols and etiquette regarding what can and cannot be asked, with regards to accessibility/accommodation needs and requests, when interacting with the public in-person, via phone, virtually/online, and/or in written form

- Staff and contractor knowledge and handling of requests for in-person Sign Language Interpreters (SLI), CART services, and other auxiliary aids, such as assistive listening devices

PRIORITY #2

Category: Grievance Policy, Complaints, and requesting further assistance.

Approximately fifty percent (50%) of feedback responses and comments in this category were in the negative, indicating a high need for action items to improve the department's awareness and implementation of these efforts and requirements:

- Existence/Establishment of a grievance policy, including a formal process and timelines to receive, review, and respond to accessibility-related complaints

- Staff and contractor awareness of the policy and procedures, including guidance on asking for help with accessibility-related matters/questions

- Informing the public of the complaints/grievance policy and procedures

- Management and coordination of grievances/complaints on an ongoing basis

PRIORITY #3

Category: Meeting Accessibility Considerations (virtual and in-person).

Approximately forty-three percent (43%) of feedback responses and comments in this category were in the negative, indicating a high need for action items to improve the department's awareness and implementation of these efforts and requirements:

- Staff and contractor awareness of application/software accessibility functions for online/virtual meetings, presentations, and training sessions

- Informing virtual meeting attendees of the software's accessibility features at the beginning of each session

- Staff and contractor assessment of a location's/venue's physical accessibility when setting up in-person presentations, meetings, and training sessions

PRIORITY #4

Category: Accessibility of Digital/Web Content and Printed Materials, including Document Remediation, Documents in Alternative Formats and Other Languages, and Required Language and Notices on Documents.

Approximately forty percent (40%) of feedback responses and comments in this category were in the negative, indicating a high need for action items to improve the department's awareness and implementation of these efforts and requirements:

- Accessibility and remediation of documents, including testing for compliance and screen reader readability

- Accessibility and remediation of online/website content

- Ability to translate documents into Braille

- Establishment of a plan on how to ensure web pages remain accessible and compliant, including procedures for new content to be tested for accessibility

- Staff and contractor awareness of Language Access Plan, including translation and interpretation procedures

- Inclusion of Notices on online and printed materials:

    - The department does not discriminate on the basis of disability

    - How to contact LAHD via TTY/TRS/711

    - How the public can request reasonable accommodations

PRIORITY #5

Category: General Accessibility Rights, Disability Discrimination, Service Animals, and Reasonable Accommodations (including Policies).

Approximately thirty-two percent (32%) of feedback responses and comments in this category were in the negative, indicating a significant need for action items to improve the department's awareness and implementation of these efforts and requirements:

- Staff and contractor awareness of general accessibility requirements and responsibilities, including etiquette, appropriate language, and more

- Staff awareness of any program design, policies, rules, circumstances, and practices which exclude, limit, restrict or discriminate against participation by persons with disabilities and/or access and functional needs

- Staff and contractor policies and procedures to handle and address requests for reasonable accommodations, including "reasonableness" considerations, such as undue financial and administrative burden or fundamental alteration of the program/service, and awareness that they may not charge persons with disabilities to cover the costs of measures necessary to ensure nondiscriminatory treatment, such as the fulfillment of reasonable accommodation requests

- Staff and contractor awareness that persons with mobility disabilities may use wheelchairs, scooters, canes, and other manually-powered mobility devices; and that power-driven mobility devices may also be used, unless determined they cannot be operated safely and create a danger to others

- Establishment, and awareness, of service and emotional support animal policies

PRIORITY #6

Category: Available options/methods for the public to apply for programs, communicate, and obtain information and services.

Approximately nineteen percent (19%) of feedback responses and comments in this category were in the negative, indicating a moderate need for action items to improve the department's awareness and implementation of these efforts and requirements:

- Availability of program eligibility and "how to apply" information in various formats, including multiple options for the public to sign up/apply and submit any required information or documentation

- Availability of multiple options for the public to speak with staff, make appointments, and/or obtain more information

- Staff and contractor ability to accommodate the manner and/or location of program/service delivery

- Availability of options for the public to submit documentation, including signatures, and conduct transactions, such as payment of funds

HUMAN RESOURCES

LAHD also modified the questionnaire/discussion questions to evaluate human resources (HR) activity and services. The City's Personnel

Department is the central HR agency for the city, providing services to all city departments. LAHD HR leadership staff are part of the City's Personnel Department and follow City Personnel Department policies and procedures as they engage with job seekers, applicants, interviewees, and employees.

HR staff identified positives, such as awareness of reasonable accommodations requests and the referral of such inquiries to appropriate staff for handling. Options are also provided to apply and submit required information, such as through email or in person. HR staff are also able to accommodate meetings and employment interviews to virtual or in-person.

HR staff identified needs as well, including a general need for additional guidance on accessibility compliance. Also, HR staff indicate a need for more information or training on receiving and handling TTY/TRS/711 calls, using VRI, addressing requests for ASL interpretation and CART services, and assessing the physical accessibility of locations when setting up in-person interviews, presentations, meetings, and training sessions.

The identified HR needs align with the needs identified for the rest of LAHD. Transition Plan action items address these needs.

DRAFT - TRANSITION PLAN - ACTION ITEMS

Based on the analysis and prioritization listed in the evaluation above, the following are proposed department-wide accessibility action items. The goal is to develop awareness, knowledge, and create annual reminders on each of the identified accessibility topics and to implement specific actions, such as VRI expansion, document remediation, and establishment of a department-wide grievance policy.

The tables below identify the proposed action items and present a timeline for implementation/completion. A couple of action items specifically look to a future contractor or an ADA program or systems technical specialist to handle hands-on department-wide work on document accessibility and remediation. Overall, the responsible party identified to ensure implementation of action items is the ADA Coordinator for LAHD Programs.

Any requested resources, including funding, staff, and contracts are subject to the City Council approval process.

PRIORITY TABLES

Table 1 - Priority #1: Effective Communication, Appropriate Etiquette, Sign Language Interpretation, CART, VRI, other assistive aids, and TTY/TRS/711 calls

Action Item	Recommended Steps	Responsible Parties	Timeline	Cost
1. Web page and digital content accessibility awareness - guidance document	Develop a guidance document for LAHD staff which includes high level information and links or references to existing accessibility requirements for web pages and digital content. Update the document periodically and disseminate it annually. Share it with contractors, as well.	ADA Coordinator	Draft document by August 2026. Update and disseminate annually.	Staff time: ADA Coordinator, Administrative Clerk, Communications team, Systems team
2. TTY/TRS/711 current practice, and how to handle calls - guidance document	Develop a guidance document which describes TTY/TRS/711, such as the California Relay Service, includes links to current TTY/TRS/711 information and resources, and describes what to expect and how to handle TTY/TRS/711 calls. Disseminate it annually to LAHD staff. Share it	ADA Coordinator	Draft document by August 2026. Update and disseminate annually.	Staff time: ADA Coordinator, Administrative Clerk

Action Item	Recommended Steps	Responsible Parties	Timeline	Cost
	with contractors, as well.			
3. VRI software - expand installation; guidance document	DoD has already provided VRI access. The license/access costs are included in DoD's budget. Verify it is working at LAHD public counters and at AcHP. Install for other programs/units, such as SCEP. Create and disseminate, to LAHD staff, a guidance document on how to use VRI. Explore access options for contractors.	ADA Coordinator	Draft document by September 2026. Update and disseminate annually. Install VRI software for all LAHD programs, including on over one hundred inspectors' devices, by December 2026.	Staff time: ADA Coordinator, Administrative Clerk, and Systems team – who will install the VRI app. Any VRI access options for contractors will entail additional costs.

Action Item	Recommended Steps	Responsible Parties	Timeline	Cost
4. Accessibility communication protocols and etiquette (what can and cannot be asked by staff, with regards to accessibility and accommodations, for example) - guidance document and training	Review AcHP Effective Communication policy and procedures. Create a guidance document, and coordinate training with DoD, which describes protocols, as relates to appropriate accessibility-related communication etiquette with the public, and provides real-world examples. Update the document periodically and disseminate it and provide training annually. Share it with contractors, as well.	ADA Coordinator	Draft document by November 2026. Update and disseminate annually. Coordinate with the Department on Disability on establishing an annual training by November 2026.	Staff time: ADA Coordinator, Administrative Clerk, Communications team, and DoD staff time
5. Handling SLI, CART service, and other auxiliary aids requests -	Develop a guidance document which describes the process for arranging in-person SLI, CART services, and other auxiliary aids,	ADA Coordinator	Draft document by November 2026.	Staff time: ADA Coordinator, Administrative Clerk,

Action Item	Recommended Steps	Responsible Parties	Timeline	Cost
guidance document and training	and includes the online request form links. Update the document periodically and disseminate it annually to LAHD staff. Develop guidance for contractors, as well. Clarify with DoD what resources are available for contractors.		Update and disseminate annually. Coordinate with the Department on Disability on setting up an annual training by November 2026.	Communications team, and DoD staff time

Table 2 - Priority #2: Grievance Policy, Complaints, and requesting further assistance.

Action Item	Recommended Steps	Responsible Parties	Timeline	Cost
6. Grievance Policy and procedures	Review Grievance Policies developed by various LAHD business units. Establish a department-wide grievance policy which includes a set of procedures and timelines to receive, review, and respond to accessibility-related complaints. Obtain information from DoD and AcHP policies. Disseminate the policy and procedures annually.	ADA Coordinator	Draft policy by July 2027. Update and disseminate annually.	Staff time: ADA Coordinator, Administrative Clerk, Communications team, AcHP team
7. Staff training on procedures for requesting help and elevating accessibility-related matters - internal/staff information and training	Train staff on the grievance policy and on procedures for staff to request help and elevate accessibility-related matters (when no grievance or complaint is involved). Provide training, annually. Share it with contractors, as well.	ADA Coordinator	Develop training by July 2027. Update, disseminate, and provide training, annually.	Staff time: ADA Coordinator, Administrative Clerk

Action Item	Recommended Steps	Responsible Parties	Timeline	Cost
8. Grievance Policy - inform the public	Disseminate public information online, and otherwise, about the department's grievance policy and procedures. Coordinate with the Communications team.	ADA Coordinator	Draft public information by July 2027. Review annually.	Staff time: ADA Coordinator, Administrative Clerk, Communications team
9. Manage Grievances & Complaints	On an ongoing basis, manage accessibility-related grievances and complaints department-wide, in accordance with the policy and procedures. Coordinate with the LAHD Executive Office.	ADA Coordinator	Begin implementation by July 2027.	Staff time: ADA Coordinator, Administrative Clerk, Executive Office Staff

Table 3 - Priority #3: Meeting Accessibility Considerations (virtual and in-person).

Action Item	Recommended Steps	Responsible Parties	Timeline	Cost
10. Accessibility functions of online meeting applications/ software (Google Meet; Zoom) - guidance document	Develop a guidance document which describes existing accessibility functions of online meeting applications/software. Coordinate with the Systems team. Disseminate it annually. Share it with contractors, as well.	ADA Coordinator	Draft document by February 2027.

Update and disseminate annually. | Staff time: ADA Coordinator, Administrative Clerk, Systems team |
| 11. Information for online meeting attendees | In conjunction with the online meetings guidance document listed above, periodically remind staff to inform virtual meeting attendees of applications and software accessibility features at the beginning of each session. | ADA Coordinator | Establish a schedule of quarterly reminders, beginning February 2027. | Staff time: ADA Coordinator, Administrative Clerk |
| 12. Accessibility of meeting locations - guidance document and checklist | Develop a guidance document which includes the process and checklist for assessing a meeting location's accessibility. Share it with contractors, as well. | ADA Coordinator | Draft guidance document and checklist by February 2027. | Staff time: ADA Coordinator, Administrative Clerk |

Table 4 - Priority #4: Accessibility of Digital/Web Content and Printed Materials, including Document Remediation, Documents in Alternative Formats and Other Languages, and Required Language and Notices on Documents.

Action Item	Recommended Steps	Responsible Parties	Timeline	Cost
13. Accessibility and Remediation of printed documents, including documents uploaded to website	Document accessibility and remediation can be complex and time consuming. Explore 2 options to conduct annual staff training on CommonLook, perform remediation of documents, and conduct document testing for compliance, ensuring screen reader readability: 1) Dedicated ADA program or Systems technical specialist, or 2) Procure a contractor. That person will also conduct training on color contrast, font size and types, line spacing, headings and structure, and on expectations of program/service contractors.	ADA Coordinator	By August 2026, determine if ADA program or Systems technical specialist will handle or if a contractor must be procured. Then, proceed with staff or procurement request & approval process.	Staff time: ADA Coordinator, Administrative Clerk, Communications team Additional future cost: 1) Dedicated ADA program or Systems technical specialist, or 2) Contractor.

Action Item	Recommended Steps	Responsible Parties	Timeline	Cost
14. Accessibility and Remediation of online content	LAHD Systems staff currently maintain a dedicated Web Accessibility team, which will expand its scope to support all LAHD website and application Systems development teams – to integrate accessibility into their work. The dedicated Web Accessibility team will provide training, tools, and guidance to each Systems development team, so that each team can implement, test, and maintain accessibility compliance of content.	Systems Web Accessibility team in coordination with Systems web site and application development teams	By October 2026, the LAHD Systems Web Accessibility team will establish a training program and integrate web accessibility practices into the development process. An online hub will be created to help Systems teams access guidance, tools, and references related to website and application accessibility.	Staff time: Systems teams, ADA Coordinator, Administrative Clerk, Communications team

Additional future cost:

1) Dedicated ADA program or Systems technical specialist, or 2) Contractor. |

Action Item	Recommended Steps	Responsible Parties	Timeline	Cost
15. Braille - documents	Explore 2 options to have the ability to translate documents into Braille and read documents in Braille: 1) Equipment and software/application purchase and training; or 2) Procure a contractor. Discuss with AcHP and DoD.	ADA Coordinator	By August 2026, determine if Braille equipment and software applications will be purchased or if contractor services must be procured. Then, proceed with equipment or procurement request & approval process.	Staff time: ADA Coordinator, Administrative Clerk, Communications team Additional future cost: 1) Equipment & software applications purchase, and training, or 2) Contractor.
16. Ongoing accessibility testing of existing and new documents and web content - plan	Establish a department-wide plan for ongoing accessibility testing of documents and content. Disseminate it annually. Share it with contractors, as well.	ADA Coordinator	Draft a plan by March 2027. Disseminate annually.	Staff time: ADA Coordinator, Administrative Clerk, Communications team, Systems

Action Item	Recommended Steps	Responsible Parties	Timeline	Cost
	This ensures that, no matter who (Systems, Contractors, others) is performing remediation and checking accessibility of web content and documents uploaded online, there is an LAHD plan and schedule to continue testing for accessibility year after year.			team
17. Documents, content, and communication - translation and interpretation into other languages	LAHD has already developed a Language Access Plan (LAP) and has translation and interpretation procedures in place. Create a summary guidance document. Disseminate information annually to LAHD business units. Coordinate on expectations of program/service contractors.	ADA Coordinator, in coordination with LAHD Language Access Liaison	Draft document/ summary by December 2026. Disseminate annually.	Staff time: ADA Coordinator, Administrative Clerk, Language Access Liaison
18. Notices, on online and printed	Create a guidance document, and disseminate information	ADA Coordinator	Draft document	Assistant to the ADA Coordinator

Action Item	Recommended Steps	Responsible Parties	Timeline	Cost
materials: - That the department does not discriminate on the basis of disability; - How to reach the department via TTY/TRS/711 - How to request a reasonable accommodation	annually on which documents should include such notices and a description of the process for the public to request reasonable accommodations. Coordinate with Communications team.		by April 2027.	Staff time: ADA Coordinator, Administrative Clerk, Communications team

Table 5 - Priority #5: General Accessibility Rights, Disability Discrimination, Service Animals, and Reasonable Accommodations (including Policies).

Action Item	Recommended Steps	Responsible Parties	Timeline	Cost
19. ADA accessibility requirements, responsibilities, and disability awareness - training	Coordinate with DoD annual training sessions on accessibility requirements and disability awareness, including etiquette, appropriate language, and more. Share with contractors also.	ADA Coordinator	Establish a training schedule by December 2026.	Staff time: ADA Coordinator, Administrative Clerk, DoD staff
20. LAHD programs – design, policies, rules, and practices - ongoing review	Annual reminder to all LAHD programs – to check program design, policies, rules, and practices - to identify any restrictions against participation by persons with disabilities. Create a summary document; disseminate annually.	ADA Coordinator	Draft document by March 2027. Disseminate annually.	Staff time: ADA Coordinator, Administrative Clerk

Action Item	Recommended Steps	Responsible Parties	Timeline	Cost
21. Reasonable accommodations - guidance document and training	Review AcHP Reasonable Accommodation and Reasonable Modification materials. Develop a department-wide reasonable accommodations guidance document, with bullet point summary, which includes procedures, reasonableness considerations, and a reminder that persons with disabilities may not be charged to cover costs of measures necessary to ensure nondiscriminatory treatment, such as the fulfillment of reasonable accommodation requests. Disseminate annually. Coordinate and share with contractors as well. Develop and conduct annual training with Q & A sessions.	ADA Coordinator	Draft document by June 2027. Disseminate annually. Develop training by June 2027.	Staff time: ADA Coordinator, Administrative Clerk

Action Item	Recommended Steps	Responsible Parties	Timeline	Cost
22. Mobility devices – guidance document	Develop a guidance document which reminds all staff that persons with mobility disabilities may use wheelchairs, scooters, canes, and other manually-powered mobility devices; and that power-driven mobility devices may also be used, unless determined they cannot be operated safely and create a danger to others. Share with contractors as well.	ADA Coordinator	Draft document by September 2026. Disseminate annually.	Staff time: ADA Coordinator, Administrative Clerk

Action Item	Recommended Steps	Responsible Parties	Timeline	Cost
23. Service animal and emotional support animal policy - guidance document and training	Review AcHP materials on Assistance Animals. Establish a department-wide guidance document and training on service animal and emotional support animal policy. Coordinate with DoD and building management at each LAHD office location. Disseminate the document and conduct trainings annually; share the guidance with contractors.	ADA Coordinator	Draft document and training by May 2027. Disseminate document, and conduct training, annually.	Staff time: ADA Coordinator, Administrative Clerk

Table 6 - Priority #6: Available options/methods for the public to apply for programs, communicate, and obtain information and services.

Action Item	Recommended Steps	Responsible Parties	Timeline	Cost
24. Multiple methods/options to apply, communicate, obtain more information, make appointments, submit documentation, conduct transactions - guidance document	Many department programs already offer the public multiple options to apply, interact, and submit documentation. Develop a department-wide guidance document describing examples of multiple options and methods which could be made available to the public. Also include considerations on the ability to accommodate the manner and/or location of program and service delivery, if requested. Disseminate annually. Share with contractors as well.	ADA Coordinator	Draft document by June 2027. Disseminate annually.	Staff time: ADA Coordinator, Administrative Clerk

APPENDIX A

STRENGTHS

Examples of identified strengths:

- Accessible Housing Program (AcHP)

  - AcHP implements the ACSA and VCA which contain requirements for mobility and hearing/vision accessible units; rental occupancy policies; training for owners and property management personnel; and program monitoring

  - AcHP provides information regarding reasonable accommodations, effective communication, and auxiliary aids during the registration process for external training webinars and on program flyers

  - Each AcHP Zoom webinar is equipped with captioning and can incorporate sign language and other interpreters

  - For outreach events, locations/rooms are set up to ensure accessibility. Information on requesting reasonable accommodations is included on event flyers.

  - AcHP staff has received CommonLook software training to remediate documents and utilizes a contractor to translate documents into the languages spoken at home by Angelenos

  - Slide presentations, informational flyers, and other materials are reviewed to ensure accessibility

  - American Sign Language and other language interpreters are obtained for events and printed materials are made available in large print versions

- ○ AcHP staff have access to video remote interpretation (VRI) services, through the Department on Disability

- ○ A Grievance team responds to grievances in Covered properties within 3 business days of receipt

- ○ The AcHP team attends accessibility-related trainings throughout the year

- ○ AcHP provides technical assistance and training to affordable housing owners and property managers regarding accessibility requirements and the protocols and etiquette regarding what can and cannot be asked with regards to accessibility/accommodation and effective communication needs and requests

- ○ AcHP inspectors ensure that architectural plans and construction of affordable housing projects meet accessibility standards

- ● Systematic Code Enforcement Program (SCEP)

  - ○ SCEP staff has received ADA training from the Department on Disability and have general awareness of ADA requirements and responsibilities

  - ○ If an inspection cannot be conducted due to a disability-related matter or request, SCEP will accommodate, including coordinating sign language interpretation or other needed assistance, and can reschedule the inspection, if needed

- ● Rent, Public Counters, and Hotline

  - ○ Public counters include stations designed to be accessible for mobility devices, such as wheelchairs, in order to ensure customers can be appropriately assisted

- ○ VRI software has been installed at public counter computers and counter staff have received training on how to use it

- ○ Rent bulletins and forms published online, or available electronically, are ADA compliant and the information can be provided in different languages or formats when requested

- ○ Various methods are available for the public to submit documents and payments, including online, in-person, by mail, fax, and over the phone

- ○ Multiple options are available for the public to speak with staff, make appointments, or obtain more information, including in-person, virtual appointments, over the phone, or via email

- ○ Information on requesting reasonable accommodations is included in advertisements for Rent-hosted webinars, presentations, and workshops

- ○ Staff are aware of protocols and etiquette regarding what can and cannot be asked with regards to accessibility/accommodation needs and requests

- ● Communications

  - ○ Documents, including newsletters, are checked for accessibility, color contrast, font type/size

- ● Billing and Collections

  - ○ Documents available on the website and customer portable are ADA compliant

  - ○ Property Owners & Management Companies can request electronic delivery of their billing statements

  - ○ Property Owners & Management Companies have various options to complete forms and make payments

- ○ Billing Helpline staff have experience in handling 711/TRS/TTY calls

- ○ Staff have received training on ADA requirements and disability awareness

- Hearings

  - ○ Hearing notices include information regarding ADA and accessibility resources for constituents, should they need this information to attend hearings

  - ○ Staff have attended Department on Disability training sessions

- Affordable Housing Managed Pipeline (AHMP)

  - ○ Staff, who sends information to developers interested in participating in competitive Notices of Funding Availability (NOFAs), remediates documents for ADA compliance, checks metadata, alt text, color contrast, unique sheet names, and meaningful hyperlink text

- Handyworker

  - ○ Actively promotes services for persons with disabilities

- Systems

  - ○ Continuously checks accessibility of department internet and intranet sites

  - ○ Staff have also trained LAHD staff on Commonlook software and assisted with document accessibility

  - ○ Tests the Affordable and Accessible Housing Registry website for accessibility/ADA compliance

  - ○ LAHD web pages use Google translator, which assists to breaks down language barriers

- ○ 711 information is available on LAHD web pages

- Administrative Services

  - ○ Required general language on accessibility is included in the Request for Proposals (RFP) template and within the Standard Provisions of professional service contracts executed by the department

  - ○ Procurement staff reviews publicly posted documents for accessibility requirements

  - ○ Contracts with a vendor to provide as-needed translation services in various languages

- ULA and Citizen Oversight Committee (COC)

  - ○ Program documents are remediated for accessibility

  - ○ COC agendas provide instructions for requesting reasonable accommodations

- Public Policy & Research (PP&R)

  - ○ Assessment of Fair Housing (AFH) meeting notices included instructions on how to request reasonable accommodations

  - ○ AFH public meetings were recorded with American Sign Language (ASL) interpreters

  - ○ AFH public meeting attendees had access to the use of captions during live meetings

  - ○ Staff know how to submit ASL and CART requests using DOD's online request form

- Performance Metrics & Data Analytics

- - Web development contractor staff are aware of accessibility requirements

  - Public-facing digital materials are remediated prior to posting

- Some of the strengths identified by other department work units include:

  - Basic awareness of accessibility requirements and responsibilities

  - All programs understand they may not charge persons with disabilities for costs associated with the fulfillment of reasonable accommodation requests

  - Program documents include reasonable accommodations and 711 information

  - Multiple options available for the public to interact/speak with staff, make appointments, obtain more information, and submit documentation

  - City contracts include a clause for access and accommodation and contractors certify they will comply

  - Awareness that the city's online training system - CornerStone – contains training sessions on ADA requirements and disability awareness

  - Awareness of CommonLook software

APPENDIX B

AREAS IN NEED OF IMPROVEMENT

Examples of staff comments indicating weaknesses or areas in need of improvement:

- Unsure if documents are being tested for accessibility

- Unsure what to do if Braille is requested

- Not clear on reasonable accommodation policies, especially for contractors

- Some staff have not attended ADA disability-related training

- Concern that contractors may not be provided with training or guidance on accessibility responsibilities and ADA requirements

- Unsure how to arrange for, or request, ASL, CART services, or other assistive listening devices

- Unaware of a grievance procedure or policy

- Unsure about the process for handling 711/TRS/TTY calls

- Unaware of VRI

- Unaware how to assess physical accessibility at meeting locations

- Unsure of appropriate protocols and etiquette regarding what can and cannot be asked with regards to accessibility/accommodation needs and requests

- Unsure how to determine "reasonableness" considerations, such as undue financial and administrative burden or

fundamental alteration of a program/service, for reasonable accommodation purposes

- ○ Unsure about service animal policies - coordination between city, department, and building ownership/management policies

- ○ Unsure if some letters generated automatically by software systems, are checked for accessibility

- ○ Some printed materials may not include notice that the department does not discriminate on the basis of disability or explain the process to request reasonable accommodations

- ○ Unaware of a process for staff and contractors to elevate and/or refer accessibility questions/concerns so they are addressed timely

- ○ Despite training on document remediation, non-Systems staff express difficulty in remediating PDF documents

- ○ Unsure if materials such as fliers, brochures, booklets and other printed documents meet accessibility requirements

- ○ Unaware of online/virtual meeting applications' accessibility features (such as Google Meet and Zoom)

- ○ Unsure of process for requesting translation of documents into languages other than English and Spanish

- ○ Unaware how to request or create alternative versions of documents

- ○ No apparent common/official procedure to receive accessibility-related complaints

- ○ While many options are available for interactions and transactions, certain registrations and payments may have to be made via a certain portal only, with no other options

- ○ Unsure about the accessibility requirements for California Public Records Act (CPRA) requested records, which are typically electronic copies of scanned files, audio files, photographs, and emails

- ○ Unsure about the specific standards for color contrast, font type and size, and large print

- ○ Unsure how to verify screen reader readability/accessibility