

<b>Angeles Institute Policy</b>	<b>ADA Nondiscrimination Policy Version 2</b>
<b>Number: General 1.0</b>	<b>Effective Date: 06/25/2020</b>
<b>MOST RECENT CHANGES</b> Version #: 2 1. Alicia Robinson 2. Brandy Coward	

**I. POLICY PURPOSE**

The purpose of this policy is to maintain anti-discrimination laws in accordance with the USAO ADA compliance department and our commitment to provide equal opportunity and access to all prospects, students, employees, and visitors.

**II. POLICY STATEMENT**

Policy for Ensuring Effective Communications with Individuals with Disabilities

It is the policy of Angeles Institute, LLC (“Angeles”) not to discriminate against any individual on the basis of disability in the full and equal enjoyment of its goods, services, facilities, privileges, advantages, or accommodations, including Angeles’ training programs and events sponsored, organized, or hosted by Angeles that are open to the general public.

Accordingly, Angeles will ensure that communications with individuals with disabilities are as effective as communications with individuals without disabilities, consistent with the requirements of Title III of the Americans with Disabilities Act (ADA), 42 U.S.C. § 12181—12189, and the regulation implementing Title III, 28 C.F.R. Part 36. To meet this obligation, Angeles will provide, free of charge, appropriate auxiliary aids and services, whenever necessary, to ensure that individuals with disabilities have an equal opportunity to participate in and benefit from Angeles’ goods, services, facilities, privileges, advantages, and accommodations unless Angeles can demonstrate that taking those steps would fundamentally alter the nature of the goods, services, facilities, privileges, advantages, or accommodations being offered or would result in an undue burden, i.e., significant difficulty or expense. To the extent the provision of a particular auxiliary aid or service by Angeles would result in a fundamental alteration or an undue burden, Angeles shall provide an alternative auxiliary aid or service, if one exists, that would not result in a fundamental alteration or undue burden but would nevertheless ensure that, to the maximum extent possible, individuals with disabilities receive the goods, services, facilities, privileges, advantages, or accommodations offered by the public accommodation. 28 C.F.R. § 36.301(c), 36.303. This policy applies to all members of the public, including students and prospective students, who interact with Angeles.

1. Appropriate Auxiliary Aids and Services

Appropriate auxiliary aids and services include a wide variety of equipment, materials, and services that may be necessary to ensure effective communication for people with disabilities.

For people who are deaf, are hard of hearing, or have speech impairments, appropriate auxiliary aids include, but are not limited to, qualified oral/sign language interpreters (including on-site and video remote interpreting (VRI) services), written notes, notetakers, computer-assisted real-time transcription services, video text displays, amplified and hearing-aid-compatible telephones, assistive listening systems, open or closed captioning and caption decoders, teletypewriters (TTYs), computer terminals equipped for video communication, and other effective methods of making information or materials delivered using sound available to individuals who are deaf or hard of hearing.

Qualified interpreters. The term “qualified interpreter” includes “sign language interpreters,” “oral interpreters,” or other “interpreters” who, via video remote interpreting (VRI) service or an on-site appearance, are able to interpret competently, accurately, and impartially, both receptively and expressively, using any specialized terminology necessary for effective communication with an individual who is deaf or hard of hearing or who has a speech impairment, given that individual’s language skills and education. Not all interpreters are qualified to interpret in all situations. For example, an interpreter who is qualified to interpret using American Sign Language (ASL) is not necessarily qualified to interpret orally. Also, someone who has only a rudimentary familiarity with sign language or finger spelling is not a “qualified sign language interpreter.” Likewise, someone who is fluent in sign language but who does not possess the ability to interpret specialized terminology, process spoken communication into the proper signs, or observe someone signing and translate their signed or finger-spelled communication into spoken words is not a qualified sign language interpreter. 28 C.F.R. § 36.104, 36.303(b). Although an interpreter may be certified, a certified interpreter is not necessarily “qualified.” Similarly, certification is not required in order for an interpreter to be “qualified.”

- Situational assessment. The term “situational assessment” means any discussion or evaluation of a student or prospective student’s needs for auxiliary aids and services in the context of any educational program offered by Angeles.
  - Determining which auxiliary aids and services are appropriate. In determining which types of auxiliary aids and services to provide, Angeles will consult the requesting individual with a disability to determine what type of auxiliary aid is needed to ensure effective communication.

## 2. Requests for Auxiliary Aids and Services

Whenever possible, requests for auxiliary aids and services should be directed to [insert name, and title of designated ADA Coordinator], at [insert telephone number, and email address]. Requests can be made by an individual with a disability who needs the auxiliary aids or services or by someone acting on that individual’s behalf. When [name of person designated above] is not available to receive a request, the request may be directed to [designate alternative personnel for receiving requests]. Requests can be made either in writing or orally. Requests should be made in advance, whenever possible, in order to better enable Angeles to address the communication needs of the individual. However, Angeles will address all requests for auxiliary aids and services promptly and in accordance with ADA requirements.

- Open houses and tours. For all open houses, tours, and similar events conducted by Angeles, Angeles shall provide, at its own expense, a qualified interpreter for any individual who is deaf or hard of hearing, provided that the individual notifies Angeles at least 10 days before the event of a request for a qualified interpreter.
- Situational assessments. In the event that a student or prospective student requests a situational assessment at no charge to Angeles, Angeles shall allow and cooperate in that situational assessment. Angeles shall make individualized determinations based on the specific facts of each request and shall not apply a general prohibition against providing particular types of modifications, auxiliary aids or services.
- Angeles will respond to requests for auxiliary aids and services promptly. Upon receipt of notification that any auxiliary aids and services will be necessary, Angeles will confer with the individual with the disability to ascertain the individual's needs. Angeles will respond promptly (i.e. within 10 days) to all requests for auxiliary aids and services to ensure that individuals with disabilities have a full and equal opportunity to participate in, and benefit from the goods, services, facilities, privileges, advantages, or accommodations offered by Angeles. Angeles will neither request nor require documentation of disability.
- Responding to requests for auxiliary aids and services. In response to the student's or prospective student's request, Angeles may:

Grant the request;

Make a narrowly tailored request for more information about the request and, within three days of receiving the information, grant or deny the request; or o Deny the request upon establishing that offering the particular auxiliary aid or service would fundamentally alter the course or would result in an undue burden. Angeles will document each reason why additional information is needed and/or each reason for a denial of a request.

- Consideration of alternatives. Should the person making the request disagree with the assessment or wish to discuss it, Angeles shall arrange a time to meet with the person within 15 days. At that meeting, Angeles shall engage in an interactive process with that person to consider alternative auxiliary aids and services or modifications that would not fundamentally alter Angeles' courses or result in an undue burden. Angeles shall furnish appropriate auxiliary aids and services for such meetings as necessary to ensure effective communication.

### 3. Angeles Will Provide Auxiliary Aids and Services Free of Charge

People with disabilities must not be asked to pay or be charged for the cost of an auxiliary aid or service needed for effective communication. 28 C.F.R. § 36.301(c). Accordingly, Angeles will provide auxiliary aids or services needed for effective communication free of charge unless the cost of providing such auxiliary aids

and services constitutes an undue burden, in which case Angeles shall provide an alternative auxiliary aid or service, if one exists, that would not result in an undue burden but would nevertheless ensure that, to the maximum extent possible, people with disabilities receive the goods, services, facilities, privileges, advantages, or accommodations offered by Angeles. Auxiliary aids and services may include taped texts, interpreters or other effective methods of making orally delivered materials available to individuals with hearing impairments, and other similar services and actions.

#### 4. Angeles Shall Not Require Individuals to Bring Their Own Interpreters

People with disabilities, including students and prospective students, must not be asked to bring other individuals to interpret for them.

#### 5. Course Modifications

Angeles must make modifications to its courses if necessary to ensure that the place and manner in which are given are accessible to individuals with disabilities.

#### 6. Accessible Facilities or Alternative Arrangements

Angeles must administer its courses in facilities that are accessible to individuals with disabilities—including individuals who are deaf or hard of hearing—or else make alternative accessible arrangements that provide comparable conditions to those provided for nondisabled individuals, e.g. providing the course through video recordings or prepared notes.

#### 7. Non Retaliation

Angeles will not retaliate against or coerce in any way any person who made, or is making, a complaint according to the provisions of this Agreement or exercised, or is exercising, his or her rights under this Agreement or the ADA.

### III. **AUTHORITY AND CROSS-REFERENCE LINKS**

All questions and concerns regarding ADA accommodations and matters should be directed to the following Angeles Institute staff:

Ali Robinson  
[ali@angelesinstitute.edu](mailto:ali@angelesinstitute.edu)  
562-531-4100 ext. 209

USAO Rep:

Matthew Nickell Assistant U.S. Attorney Civil Rights Section, Civil Division  
United States Attorney's Office 300 North Los Angeles Street, Suite 7516 Los

Angeles, California 90012 Email: matthew.nickell@usdoj.gov

**IV. DISCLAIMER** The Senior Administration has the discretion to suspend or rescind all or any part of this policy or related procedure(s). The Senior Administration shall notify the appropriate personnel of the suspension or rescission. Questions about this policy should be referred to the Senior Administration or Manager.

**V. SIGNATURES**

Recommended by:

Ali Robinson, ADA Coordinator

Jun 25, 2020

Print Name/Title

Date

*Ali Robinson*

Recommending Authority Signature

Approved by:

Brandy Coward, Director of Nursing

Jun 25, 2020

Angeles Institute Senior Administration Name/Title

Date

*Brandy Coward*

Brandy Coward (Jun 25, 2020 12:25 PDT)

Approval Authority Signature







# ADA Policy Including Exhibit A

Final Audit Report

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