

LARGE EVENT ACCESSIBILITY MEMO

Introduction

Voters with disabilities, like other constituency appreciate inclusive policy, but their vote and action are locked in by a campaign's ability to be accessible. Without access they are unable to participate in the process and voters with disabilities view electoral politics on the whole. Meaning that if a campaign is not accessible they assume the polling place or their ballot will not be either and they often choose to not vote as a result. **Campaign event access is more than just federal law compliance – it is voter persuasion, outreach and contact when it comes to voters with disabilities.**

The campaign, party and/or most of the locations for large events are all required to provide accessibility under Title III of the Americans with Disabilities Act. And no matter the responsible party, the need for good and engaging optics dictates that we are accessible.

First, this memo recognizes the great lengths staff have accomplished and their sincerity to provide accommodation for supporters with disabilities. This is not always easy work and the goal of this memo is to make it a bit easier and take some of the pressure off of campaign staff while also making the right decisions to be ADA compliant. But second, we must acknowledge that during the past year disability advocates and associates have reported breakdowns in accessibility at campaign events.

Below is some discussion and recommendations for increasing accessibility at large events like rallies in these categories: 1) Reasonable Accommodation Requests, 2) Communication Access, 3) Physical Structure: Bathrooms, Path of Travel and Seating, 4) Entrances and Outdoor lines.

Reasonable Accommodation Requests

The campaign has currently engaged in a practice of providing ASL one an event reaches a certain threshold of attendance. While this type of practice may seem reasonable to the non-disabled logistics planner, it must be noted that it is in contradiction to the standards set in the ADA and is inconsistent

with disability cultural competency. In fact, this practice seems to anger people with disabilities.

Not every event requires a large number of accommodations. But where they are applicable, there should be a request mechanism on the online rsvp form for an event. The campaign can still choose to provide certain accommodations after they hit a certain rsvp threshold, but they should also expect to provide them under that threshold on request – and in either situation the request mechanism needs to be included in the online form.

My recommendation is that an ADA request be added to the rsvp for all public candidate and surrogate speaking events in these three areas:

- American Sign Language (see next section)
- Assisted Listening Devices (often can be provided by the venue or paired with the campaign's own sound system)
- Sighted Guides to seating (volunteer guides for the blind and low vision to and from their seating)

A confirmation email should let folks know where to check in to receive these accommodations.

Communication Access

American Sign Language (ASL) and live CART Captioning are not just an accommodation but they are also a key factor in winning and locking in votes from people with disabilities. The disability community looks for symbols and signs of accessibility, and those signs are often not specific to one's own disability but reflect the diversity of disability in the community. When a wheelchair user sees ASL they think the office will be accessible to them, when a blind person hears about CART captioning being provided they trust the website will be accessible...and so on. ASL in particular is one of these universal signs much like the blue wheelchair symbol.

We often receive many complaints from Deaf people over ASL placement. The security needs and concerns around ASL placement are understandable on something like a presidential campaign. However, if Deaf or Hard of Hearing (HOH) persons aren't able to see the interpreter

they do not receive the words. Additionally, the interpreter should be placed at the same height and near the speaker – this allows the Deaf or HOH person to process the words and facial expression at the same time as everyone else in the room. Deaf and HOH hearing people report that being separated from the interpreter sightline or separating the interpreter from the speaker's facial expression is considered segregation.

Some recommendations for ASL placement to help alleviate some of the reported barriers for Deaf and HOH people:

- ASL Interpreter stand on a box at the same height as the stage behind and to one side of the stage inside the friendly buffer.
- Putting the ASL interpreter on camera, projected to a large screen that can be seen throughout the rally hall but to the side and out of sight of the network camera shot.
- Creating an ASL seating section allowing the interpreter to stand just inside or just outside of the friendly buffer
- Hiring staff ADA interpreters for the travel team or advance. The White House has now done this to comply for Deaf staff and regular visitors. The interpreters would be already vetted, on call instantly and could perform other jobs or activities between interpreting times.

This section of the memo concentrated more on ASL, but these same standards should apply for CART captioning placement, whichever is requested by the person.

Physical Structure: Bathrooms, Path of Travel and Seating

Physical and actual access is highly important, this is the area where the campaign will receive the most incoming participants, praise and complaints. Especially since this includes seniors who need an accommodation but do not identify as disabled and may not request one in advance-but most certainly will expect one. Here are some things that could be addressed better:

- Bathrooms should be accessible. If accessible bathrooms are not present on site, then accessible portable restrooms should be rented.

There should also always be a 4-foot wide clear path of travel from the seating section to the bathroom at all times.

- Path of travel for the ADA section has consistently been over wires and electrical lines with bulky wire covers. This can be dangerous for folks using walkers, canes and wheelchairs. But most certainly it can make a 400-600 lb power chair topple. Path of travel to the ADA section and to and from the bathroom should be re-routed not to go over wires or through other barriers.
- If ADA seating is provided it should not be separate from VIP seating, to combine these sections may be a violation of federal law. You may want to consider an rsvp process for reserving this section as well. And last, if the ADA section is place near the front near large staging, be aware that sometimes the wall for the friendly buffer can block the view of the stage.

Entrances and Outdoor Lines

Many people with disabilities and seniors who need accommodation do not have the physical strength to stand for long periods of time. And there are often on medications, sometimes at high levels, which are affected by temperature and other conditions.

The campaign should take some steps to modify their entrances and waiting spaces for people with disabilities as required by the ADA. Some examples of possible modifications:

- Provide bottled water for outdoor lines
- Allow for a shaded senior and people with disabilities waiting area
- Consistency with ADA entrances and clear rollable path of travel
- Consistency with ADA seating areas

Conclusion

Providing good ADA access is a key element to locking in the votes from people with disabilities. Like any other minority group, they are attracted by policy but act on deeds – usually related to physical or actual access that allows them to participate equally in events and activities like anyone else.

I am happy to be a continual resource for the campaign and advance team.
Please feel free to reach out to me at any time:

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