



Effective Communication for Individuals with Disabilities

Purpose

This policy confirms Aqua Services' ("Aqua") commitment to providing individuals with disabilities the means to communicate effectively with Aqua consistent with the requirements of the Americans with Disabilities Act (the "ADA") and other applicable law.

This policy applies to Aqua's customer services telephone lines. It addresses communications with all individuals with disabilities (customers, potential customers, and their companions) using or attempting to use Aqua's customer services telephone lines.

Policy Statement

Consistent with the requirements of Title III of the ADA, it is the policy of Aqua not to discriminate against any individual with a disability in the full and equal enjoyment of our goods, services, facilities, privileges, advantages, and accommodations. It is also our policy to ensure that communications between our team members and individuals with disabilities are as effective as communications between our team members and individuals without disabilities. Consistent with these commitments and with Title III of the ADA Aqua will provide sufficient information and access to ensure effective communication between Aqua's customer service personnel and individuals with disabilities.

Standards for Effective Communication

Requests for Auxiliary Aids and Services

When Aqua is notified that an auxiliary aid or service has been requested, Aqua team members will confer with the person with the disability (and if that is not feasible, will confer with the requestor) to ascertain the circumstances, requirements, and preferences of the individual with the disability. Aqua will respond promptly to requests for auxiliary aids and services to ensure that delays in responding do not deny individuals with disabilities an equal opportunity to participate in, and benefit from, Aqua's services. Documentation of disability will generally not be requested or required.

Determining Types of Auxiliary Aids and Services

The determination of which appropriate auxiliary aids and services are necessary and the timing, duration, and frequency with which they are provided, in order to ensure effective communication, will be made by Aqua. Where possible, Aqua will make the determination in consultation with the individual who has a disability, based on an individualized assessment. The assessment will take into account all relevant facts and circumstances, including without limitation the following:

- The nature, length, and importance of the communication at issue
- The individual's communication skills and knowledge
- The individual's request or statement of need for a specific auxiliary aid or service (for example: interpreter, large-print statements)
- The availability at the required times of appropriate auxiliary aids and services, including qualified sign language or oral interpreters

Before determining the type of interpreting service (or other auxiliary aid or service) to be secured, Aqua will consult with the individual requiring interpreter service (or other auxiliary aid or service) and recognize his or her preferred mode of communication (for example, American Sign Language, Signed English, oral interpreting, large print, Braille, or accessible electronic format). In determining what types of auxiliary aids or services are necessary, Aqua will give consideration to the requests of the individual.

Some example situations involving auxiliary aids and services, as well as examples of appropriate aids and services, are described in Appendix 1: Definitions and Examples.

Accepting Requests

Requests for auxiliary aids or services 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. Requests can be made orally or in writing.

Aqua may ask that requests for interpreters be made in advance, whenever possible, to better enable Aqua to address the communication needs of the individual.

However, all requests for auxiliary aids and services will be addressed promptly and in accordance with ADA requirements.

Possible Decision to Deny Request

If, after consulting with an individual requesting auxiliary aids or services, Aqua determines that auxiliary aids or services should be denied, or that an auxiliary aid or service different than that requested should be provided, then Aqua team members should follow the procedures required by departmental guidelines. Records will be created and retained detailing the reasons for denying the requested auxiliary aid or

service or providing an aid or service different than that requested, and will be submitted monthly to Aqua 's ADA Coordinator.

If Aqua denies a request because providing the requested aid or service would result in a fundamental alteration or undue burden, Aqua will provide an alternative auxiliary aid or service, if one exists, that would not result in such alteration or burden but would nevertheless ensure that, to the maximum extent possible, individuals with disabilities receive the services offered by Aqua.

Friends and Family Members

Aqua team members may not ask or require friends or family members to interpret for individuals who are deaf, are hard of hearing, or have speech disabilities, because a family member or friend may not be qualified to render the necessary interpretation due to factors such as professional or personal involvement. Where the individual with a disability specifically requests that an accompanying adult interpret or facilitate communication, the accompanying adult agrees to provide such assistance, and reliance on that adult for such assistance is appropriate under the circumstances, Aqua will permit such assistance.

Cost

Aqua will not charge or ask individuals with disabilities to pay for the cost of an auxiliary aid or service needed for effective communication.

Standards for Administering this Policy

Departmental Procedures

Departments that have or may have any contact with external customers, potential customers, and/or their companions to provide customer service via telephone are required to have procedures in place addressing various aspects of communicating with individuals with disabilities described in this policy. Departments procedures should include the following:

- Who to contact within that department, if there are questions about how the requirements of this policy are handled in that department
- How to handle requests for auxiliary aids or services
- Deciding which auxiliary aids or services to provide
- Requesting auxiliary aids or services

- How to handle situations where an auxiliary aid or service is denied, or an auxiliary aid or service different than that requested is provided

Procedure/Policy Questions

If you have any questions regarding this policy, or the provision of auxiliary aids and services under Title III of the Americans with Disabilities Act, you should contact Aqua's ADA coordinator toll-free at 844.557.1818 or adacoordinator@essential.co

Appendix 1: Definitions and Examples

Appropriate Auxiliary Aids and Services

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

Examples: Hearing/Speaking

Examples of auxiliary aids and services for individuals who are deaf, are hard of hearing, or have speech disabilities include:

- Qualified sign language and oral interpreters, including on-site and video remote interpreting (VRI) services
- Note takers
- Computer-aided transcription services
- Written materials
- Telephone handset amplifiers, assistive listening devices, assistive listening systems, telephones compatible with hearing aids, closed caption decoders, open and closed captioning, TTYs/TDDs, videotext displays, or telephone communication using relay services
- Accessible electronic information technology (for example, accessible websites)
- Other methods of delivering effective communication to these individuals, including methods that may come into use or existence

Examples: Seeing

Examples of auxiliary aids and services for individuals who are blind or have low vision include:

- Qualified readers
- Note takers

- Audio recordings
- Braille materials or tactile materials (for example, raised line checks and check writing templates)
- Large print materials
- Materials in accessible electronic formats (e-mail, HTML, word-processing format)
- Video magnification devices and software
- Screen reader software
- Accessible electronic information technology (for example, accessible websites)
- ATMs with tactile input mechanisms and audible output
- Other methods of delivering effective communication to these individuals, including methods that may come into use or existence

Fundamental Alteration

A "fundamental alteration" is a modification that is so significant that it alters the essential nature of the goods, services, facilities, privileges, advantages, or accommodations offered.

Qualified Interpreter

A "qualified interpreter" means an interpreter who, via a video remote interpreting (VRI) service or an on-site appearance, is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Qualified interpreters include, for example, sign language interpreters, oral transliterators, and cued-language transliterators.

Specialized terminology necessary for effective communication with an individual who is deaf or hard of hearing or who has a speech disability needs to consider that individual's language skills and education. Not all interpreters are qualified for all situations. For example:

- An interpreter who is qualified to interpret using American Sign Language (ASL) is not necessarily qualified to interpret orally.
- Someone who has only a rudimentary familiarity with sign language or finger spelling is not a "qualified sign language interpreter."
- Someone who is fluent in sign language but who does not possess the ability to process spoken communication into the proper signs or to observe someone

signing and translate their signed or finger-spelled communication into spoken words is not a "qualified sign language interpreter."

- An interpreter who knows tactile interpreting may be the only interpreter who is qualified to interpret for someone who is both deaf and blind.

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."

Qualified Reader

A "qualified reader" means a person who is able to read effectively, accurately, and impartially using any necessary specialized vocabulary.

Undue Burden

"Undue burden" means significant difficulty or expense. In determining whether an action would result in an undue burden, factors to be considered include:

- The nature and cost of the action needed
- The overall financial resources of the site or sites involved in the action; the number of persons employed at the site; the effect on expenses and resources; legitimate safety requirements that are necessary for safe operation, including crime prevention measures; or the impact otherwise of the action upon the operation of the site
- The geographic separateness, and the administrative or fiscal relationship of the site or sites in question to any parent corporation or entity
- If applicable, the overall financial resources of any parent corporation or entity; the overall size of the parent corporation or entity with respect to the number of its employees; the number, type, and location of its facilities
- If applicable, the type of operation or operations of any parent corporation or entity, including the composition, structure, and functions of the workforce of the parent corporation or entity

Video Remote Interpreting

"Video remote interpreting (VRI) service" means an interpreting service that uses video conference technology over dedicated lines or wireless technology offering high speed, high bandwidth video connection that delivers high-quality video images meeting the following requirements:

- Real-time, full motion video and audio over a dedicated high-speed, wide bandwidth video connection or wireless connection that delivers high-

- quality video images that do not produce lags, choppy, blurry, or grainy images, or irregular pauses in communication
- A sharply delineated image that is large enough to display the interpreter's face, arms, hands, and fingers, and the participating individual's face, arms, hands, and fingers, regardless of his or her body position
 - A clear, audible transmission of voices
 - Adequate training for users of the technology and other involved individuals so that they may quickly and efficiently set up and operate the VRI

Situations Involving Auxiliary Aids and Services

Examples: When An Auxiliary Aid or Service is Needed

Examples of situations where auxiliary aids and services might be needed include the following:

- A Customer with hearing impairments and/or speaking impairments calls Aqua's customer service line using a relay phone service. Relay services enable these individuals to communicate in a manner that is as close to "functionally equivalent" as possible to the communications experienced by telephone users. Aqua is required to accept relay service phone calls, and will direct any employee answering the phone to allow additional time at the beginning of the call for the relay service to connect and throughout the call for the relay communications to take place.
- A Customer with hearing impairments and/or speaking impairments call Aqua's customer service line without using a relay phone service. The Customer and the Aqua customer service representative are not able to effectively communicate during the call due to the customer's hearing or speaking impairment. In response, the Aqua customer service representative will direct the Customer to utilize dialing 711 to engage relay phone service for assistance and direct the Customer to <https://www.fcc.gov/> to identify services that may assist the Customer in communicating with Aqua.