



Florida
Developmental
Disabilities
Council, Inc.

FRAMEWORK

Effectively Engaging
Individuals with Disabilities in
Consolidated Planning

Produced in partnership with:



Consolidated planners should answer the question: how will the community provide equal access and equal opportunity for individuals with disabilities to participate in the planning process?



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thank you

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I. INTRODUCTION

As the nation faces an affordable housing crisis and combats threats to state and federal housing dollars, it is critical that the housing needs of individuals with disabilities are fully represented. Too often the needs of individuals with disabilities are understated and undervalued as a result of non-participation in the planning process. To address this, the Florida Developmental Disabilities Council (FDDC) and Florida Housing Coalition (FHC) have partnered to provide individuals with intellectual and developmental disabilities, and cross-disability populations with shared priorities, training to navigate and engage in community-based planning efforts surrounding affordable housing. The focus is to equip individuals with disabilities with the tools to confidently participate in community engagement activities with the goal of increasing access to affordable, accessible, inclusive housing.

The U.S. Department of Housing and Urban Development (HUD) should be considered a primary resource for addressing the housing needs of individuals with disabilities. Thus, this framework will emphasize participation in HUD's consolidated planning process. As funds are distributed on a priority needs basis, it is essential for consolidated planners to effectively engage the disability community to properly identify housing needs. Public administrators do not intentionally exclude individuals with disabilities, but they are often unaware that traditional methods of outreach fail to properly engage the disability community. Setting goals and implementing strategies for accessibility will reduce barriers to participation and will make the process more inclusive. **Consolidated planners should answer the question: how will the community provide equal access and equal opportunity for individuals with disabilities to participate in the planning process?**

FRAMEWORK GOALS

- 1.** **Provide Vision:** Change the perception that complying with federal regulations is synonymous with inclusive planning, specifically for individuals with disabilities.
- 2.** **Raise Awareness:** Ensure local governments have the tools to effectively engage individuals with disabilities and support inclusive planning.
- 3.** **Support Partnerships:** Create and nurture relationships between local governments and disability advocates to create an opportunity for systemic change.

Consolidated Planning Grant Programs

- Community Development Block Grant (CDBG)
- HOME Investment Partnership Program (HOME)
- Emergency Solutions Grant (ESG)
- Housing Opportunities for Persons with AIDS (HOPWA)

II. INCLUSIVE CONSOLIDATED PLANNING

Consolidated planning should include robust citizen participation and encompass strategies for maximum outreach to the community. Individuals with disabilities are often underrepresented in the citizen participation process, primarily due to traditional outreach methods being insufficient for meeting accessibility needs. Implementing accessible policies and design practices when developing the Consolidated Plan will benefit the overall outcome by increasing participation by individuals with disabilities in the decision-making process.

Usability, accessibility, and inclusion are often used synonymously in planning and design. Though their goals overlap, it is important to note that taking a singular approach to consolidated planning may result in exclusionary practices towards individuals with disabilities. In design, it is most effective to address these together to achieve inclusivity. We examine this in the following diagram.

USABILITY



ACCESSIBILITY



INCLUSION

The degree to which a product, space, procedure, or service is easily navigated by the end user.

The practice of making a product, space, procedure or service usable by individuals with disabilities.

Intentional efforts to include all people and groups and provide equal access to opportunities to those who might otherwise be excluded.



Focuses on the user experience.



Addresses discriminatory aspects of design related to individuals with disabilities.



Considers diverse needs and involves everyone to the greatest extent possible.



Product designed for effectiveness and efficiency for the end user.



Based on local and federal guidelines to ensure an equal user experience.



Aims to address physical, economic, social, and cultural limitations.



Often does not address the needs of individuals with disabilities.



Aids in mitigating barriers impeding contribution or participation.



Often considered universal design.

Usability Example:
Using an online survey to engage the community.

Accessibility Example:
Using a survey theme or template formatted for accessibility to engage the community.

Inclusion Example:
Providing access to the community engagement survey, in an accessible format, both virtually and in print.

ACCESSIBLE DESIGN vs. INCLUSIVE DESIGN

Accessible design aims to meet specific standards to maximize the independent use of products, services, and facilities by individuals with disabilities. While accessible design targets the inclusion of individuals with disabilities, it benefits everyone. Accessible consolidated planning will reduce barriers to participation by increasing access to notifications, materials, websites, surveys, and meetings. Barriers to transportation, costs for personal care assistants and caretaker respite should also be considered. While direct funding may not be provided for the latter items, a list of resources should be available.

Inclusive design, sometimes referred to as universal design, aims to exceed minimum standards to meet the needs of the greatest number of people, including underrepresented groups such as individuals with disabilities. Inclusive design is a methodology for creating a diverse process. Inclusive consolidated planning should be of utmost importance, specifically as it pertains to community engagement. Accessibility is an outcome of inclusive design.

A man with dark hair and a beard is shown from the chest up, looking down at a smartphone he is holding in his hands. He is wearing a white t-shirt. The background is blurred, suggesting an indoor setting. A semi-transparent dark blue horizontal band is overlaid across the middle of the image, containing white text.

*Accessibility is an outcome
of inclusive design.*

DOES COMPLIANCE EQUAL INCLUSION?

Local government grantees receiving funds through the U.S. Department of Housing and Urban Development (HUD) must follow federal regulations for citizen participation (24 CFR Part 91.105) when developing the Consolidated Plan. This includes having a Citizen Participation Plan that outlines local policies for conducting community engagement and, to an extent, addresses outreach to individuals with disabilities.

Limited guidance on engaging the disability community in consolidated planning and broad federal regulations exacerbates the issue of non-participation by individuals with disabilities. Flexibility allows communities to be complacent with the bare minimum and often results in unintentional exclusionary practices.

For example, publishing a public notice of upcoming community meetings in the local newspaper is required and doing so is compliant. However, access to the local newspaper is often a barrier for individuals with disabilities resulting in missed opportunities for participation. Providing several options for receiving notices in accessible formats would be considered inclusive.

Communities should conduct their citizen participation process with inclusive intentions. This requires committing to accessibility as a forethought and implementing actionable steps to achieve inclusion. It is important to remember that compliance is not the same as inclusion.

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CITIZEN PARTICIPATION REQUIREMENTS



The jurisdiction must encourage citizens to participate in the development of the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, Analysis of Impediments, and the performance report. These requirements are designed especially to encourage participation by low-income and moderate-income persons, particularly those persons living in areas designated by the jurisdiction as a revitalization area, in a slum and blighted area, and in areas where CDBG funds are proposed to be used, and by residents of predominantly low-income and moderate-income neighborhoods, as defined by the jurisdiction. A jurisdiction must take appropriate actions to encourage the participation of all its citizens, including minorities and non-English speaking persons, **as well as persons with disabilities.**



The jurisdiction must provide citizens with a reasonable opportunity to comment on the original citizen participation plan and on substantial amendments to the citizen participation plan and must make the citizen participation plan public. **The citizen participation plan must be in a format accessible to persons with disabilities, upon request.**



The citizen participation plan must provide that hearings be held at times and locations convenient to potential and actual beneficiaries, **and with accommodation for persons with disabilities.**



The citizen participation plan must provide residents of the community with reasonable and timely access to local meetings, **consistent with accessibility and reasonable accommodation requirements, in accordance with section 504 of the Rehabilitation Act of 1973 and the regulations at 24 CFR part 8; and the Americans with Disabilities Act and the regulations at 28 CFR parts 35 and 36, as applicable.**



The citizen participation plan must provide that the Consolidated Plan as adopted, Consolidated Plan substantial amendments, and the performance report will be available to the public, **including the availability of materials in a form accessible to persons with disabilities, upon request.**



In addition to citizen participation requirements, the HUD Consolidated Plan regulations identify types of organizations the grantee must consult with during the Plan's development. Entitlement grantees must consult with **public and private agencies that provide assisted housing, health services, and fair housing services** for children, veterans, youth, elderly, **persons with disabilities,** persons living with HIV/AIDS, and their families.

III. COMMUNITY ENGAGEMENT STANDARDS


For community engagement efforts to be inclusive, consolidated planners must both plan for accessibility and consider implementing practical, enforceable policies. Since local governments are bound by Title II of the Americans with Disabilities Act (ADA), most already have policies in place to mitigate discrimination. Using this to their advantage, consolidated planners should work with the local ADA Coordinator to establish protocols for carrying out consolidated planning efforts and engaging individuals with disabilities. It may be beneficial to tailor existing ADA or equal opportunity policies to include specific language. There are various methods for implementing local accessibility standards for community engagement including developing an accessibility plan, adopting an accessibility policy, or adopting an accessibility statement.

Work with the local
ADA Coordinator
to establish protocols.

DEVELOP AN ACCESSIBILITY PLAN

The first step towards a more inclusive and accessible community engagement process is preparation. Without a plan to include individuals with disabilities, outreach efforts will not achieve inclusion. Any effort put in up front to make sure outreach processes are transparent, broadly communicated, in partnership with the community, and accessible to everyone will improve public engagement, the legitimacy of planning efforts, and the quality of the final product.

An accessibility plan outlines actionable steps for removing barriers to accessibility. Having an accessibility plan helps consolidated planners structure outreach efforts to individuals with disabilities and creates an opportunity to make accessibility a permanent part of the process. It will also help individuals with disabilities and disability service providers understand the inner workings of community engagement and allow them to trust it will be inclusive. The intent of the accessibility plan is to create a standardized system for community engagement with the disability community.



An effective accessibility plan should address how access will be improved for individuals with disabilities in consolidated planning. To determine this, it may be helpful to develop a statement of commitment, learn about accessibility, and identify barriers to accessibility. When developing an accessibility plan, think about:



Transparency



Communication



Partnerships



Transparency

Transparency in consolidated planning significantly increases the ability for individuals with disabilities to participate. Full transparency includes communicating the purpose of the Consolidated Plan, project goals, timelines, and outcomes. Most importantly, a transparent process will detail how outreach efforts will be conducted and how individuals with disabilities can participate in the planning process and any subsequent funding decisions. This also includes transparency regarding how community engagement impacts the Consolidated Plan. For example, it should be made clear that there is a limit to what community engagement can affect: there is only so much funding to be spent and there are federal regulations on how funds can be spent.

Communication

Consolidated planning relies on various forms of communication to distribute information: verbal, printed, and electronic. Effective communication fosters greater engagement by individuals with disabilities and communication is most effective when it is inclusive. Accessibility can be integrated into presentations, websites, surveys, flyers, and more. Information should be conveyed in an easily understandable manner and readily available to individuals with disabilities. Consider how the needs of individuals with disabilities will be met when providing information in written and/or electronic formats and address how information will be disseminated to the disability community.



Partnerships

Supportive relationships between the public and private sector strengthens community engagement, streamlines the process, and ensures the inclusion of key stakeholders resulting in a better product. Working in tandem with the disability community increases opportunities for individuals with disabilities to be participatory in consolidated planning and be represented as equal and valued members of the community. In addition, individuals with disabilities may require specialized outreach through organizations and agencies that provide services. Establishing long-term partnerships with these organizations bridges the gap in expertise and knowledge of unmet needs of individuals with disabilities. Collaboration will help with data sharing efforts to identify common goals and align resources to be incorporated into the Consolidated Plan.

Adopt an Accessibility Policy

Commit to inclusive consolidated planning by designing, and preferably adopting, an accessibility policy. This is often done in web design but can be altered to fit the community engagement process. An accessibility policy provides formal and enforceable rules to achieve accessibility goals. There are various options for structuring an accessibility policy and plenty of literature providing guidance for proper design.



Adopt an Accessibility Statement

A statement of commitment is encouraged when approaching accessibility for internal documents such as the Consolidated Plan. The statement is a public declaration of goals and intents for carrying out an inclusive planning process. An accessibility statement should be clear that there is a commitment to applying accessibility standards in consolidated planning and in conducting a fully inclusive process. Accessibility statements also demonstrate intent for complying with ADA standards and is a path for communication with the disability community.



IV. BEST PRACTICES FOR ACCESSIBILITY

As referenced previously, accessibility refers to the practice of making a product, space, procedure or service usable by individuals with disabilities. Accessibility can be integrated into all aspects of consolidated planning including physical/virtual meetings, PowerPoint presentations, handouts, surveys, pamphlets, websites, and social media. To ensure maximum accessibility in consolidated planning, consider the following best practices:

BEST PRACTICES FOR ACCESSIBILITY

- ★ **Accessible Venue** – When hosting meetings at a physical location consider access to entry/exit points, bathrooms, doorways to rooms, and table or desk space. Think about ramps, lifts, widened doorways, and parking, and access to transportation hubs.
- ★ **Text Size and Font** – Ensure printed text is large enough for people with low vision to read. For presentations, make sure text can be read from the back of the room. Avoid serif or embellished fonts that are difficult to read.
- ★ **Color Contrast** – Use sufficient contrast between text and background colors to avoid blending. For example, if using a dark background, use a light font color. Black and white is a standard color contrast that works for printed materials and presentations.
- ★ **Graphics and Visuals** – Use graphics to support an easy read format. Avoid animation, strobes, or flashing that may overload sensory issues.
- ★ **Headings and Titles** – When developing materials or presentations use section titles or headings. A screen reader can quickly scan these to find the desired section or slide. Often, individuals with low vision rely on headings and titles to navigate the document or presentation.
- ★ **Closed Captioning** – Use closed captioning in videos, PowerPoints, or virtual trainings. Closed captioning, which is the text version of the spoken parts of videos or computer presentations, was developed to aid the hearing impaired but it is useful in many situations where audio is low or limited. YouTube and PowerPoint offer closed captioning and it is simple to turn on.
- ★ **Be Clear and Concise** – In consolidated planning there are numerous acronyms that may not be understood by the audience. Avoid using acronyms or jargon when possible. Spell out and pronounce the acronym first such as: Community Development Block Grant (CDBG) or HOME Investment Partnership Program (HOME).
- ★ **Logistics Slide** - Cover items such as how and when questions will be received, what handouts are available, and contact information for follow up. For virtual presentations you may want to address using headphones for better audio, how to raise your hand virtually, where to enter questions, and how to download handouts.

BEST PRACTICES FOR ACCESSIBILITY (continued)

- ★ **Virtual Tip Sheet** - The tip sheet should describe how to join the virtual meeting or webinar, where the chat or questions box is, how to exit the meeting, and how to find accessible features on their computer to make the user experience better.
- ★ **Alternative Text** - Alternative text helps people who cannot see the screen to understand what is important in images and other visuals. Microsoft has a feature that allows you to add alternative text to graphics and provides an option to mark as decorative, if applicable.
- ★ **Early Access** - Providing materials to attendees or registrants in advance benefits individuals with disabilities by allowing for review of materials and content at their own pace. This also allows for more time to utilize assistive devices.
- ★ **Check Accessibility** - Microsoft offers this feature to improve accessibility. Under the "Review" tab in the document or PowerPoint there is an option to check accessibility. Clicking the option will automatically run a review and identify where your document is lacking in accessibility. Microsoft also makes correcting accessibility issues a simple step by step process.
- ★ **Accessible Templates** - Check to see if the design platform offers accessible themes. Microsoft PowerPoint and Survey Monkey both offer themes that have been formatted for accessibility.
- ★ **Accommodations Statement** – Include a statement for requesting reasonable accommodations on all materials. The statement should include a contact name, phone number, and email address.
- ★ **Contact Information** - Always provide a local staff contact in materials for access to information.

V. STRATEGIES FOR EFFECTIVE ENGAGEMENT

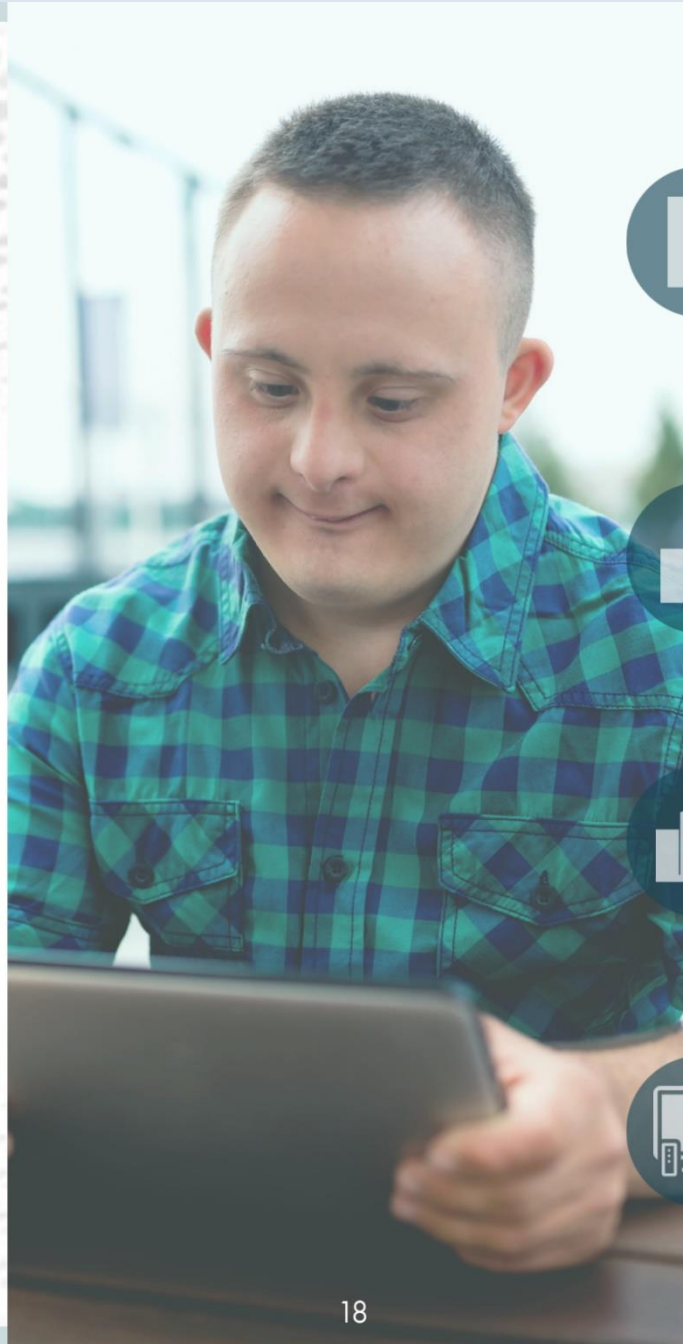
Incorporated into this framework are high impact strategies for engaging individuals with disabilities in consolidated planning. Outreach strategies were identified through extensive consultation with the disability community and should be employed to promote policy change and support effective communication with individuals with disabilities, their families, advocates, and professionals who provide services. These strategies can easily be incorporated into planning policies and procedures.

The framework should be considered a model for accessibility in consolidated planning and provides the opportunity for communities to champion efforts to increase participation by individuals with disabilities in local planning processes surrounding funding decisions.

Providing Notice

Public notification is required in consolidated planning and efforts should be extensive, specifically when notifying the public of upcoming community engagement activities.

When providing notice to individuals with disabilities, employ the following strategies:



Distribute flyers to disability service providers, specifically targeting the Agency for Persons with Disabilities (APD) support coordinators and local chapters of the Center for Independent Living and The Arc of Florida.



Post notices to official social media pages including Facebook, Twitter, Instagram, and LinkedIn.



Distribute notifications or related materials at community facilities, transportation hubs, local government offices, libraries, universities, or medical facilities.



Advertise notices on local television, radio shows, and in print media.

Data Sharing

Consolidated planning regulations require coordination and consultation with stakeholders. Networking and open communication supports a transparent process and ensures data accuracy when identifying priority needs.

When sharing or requesting data from the disability community, employ the following strategies:



Email a data collection template to disability service providers to answer specific questions related to the Consolidated Plan.



Implement regular meetings with disability service providers to share, coordinate, and discuss disability information, specifically the Agency for Persons with Disabilities and local chapters of the Center for Independent Living and The Arc of Florida.



Provide contact information for disability service providers to call for information, to ask questions, or make requests for accommodations.



Email an executive summary of the Consolidated Plan to disability service providers for comment. Provide a link to the full document in the email.



Use listservs or online portals for distributing Consolidated Plan notifications and information, including ads for upcoming community engagement meetings.

General Participation

As a result of underrepresentation in community-based planning, the needs of individuals with disabilities are often overlooked and underfunded.

To increase overall participation by individuals with disabilities in consolidated planning, employ the following strategies:



Incorporate a hybrid approach to community engagement by conducting public meetings both in person and virtually.



Offer grant workshops, town halls, or public events to increase knowledge and awareness of consolidated planning efforts. These should be held prior to commencing planning activities and separate from community engagement meetings.



Compile a stakeholder list of local disability service providers or advocacy organizations in the area. Include the Public Housing Authority as a disability service provider as well as public housing institution.



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