

Disability Preparedness

Innovative Workplace Safety Accommodations for Emergency Response and other Emerging Issues for Hearing-Impaired Workers



Office of Science and Technology Assessment

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Be Aware and Prepare

EXPECT THE UNEXPECTED

- Disasters and emergencies can strike anyone, anytime, anywhere.
- Protect yourself, your workers and your business.
- Be prepared with an action oriented plan to respond quickly and effectively.



During a Workplace Emergency

- **Persons with disabilities may need assistance.**
- **Some physical disabilities will be obvious.**
- **Some may not be.**
 - **Mental illness or cognitive disabilities.**
- **Every person and every disability is unique.**
- **Respecting people with disabilities and treating them with dignity must be part of the response.**

Workplace Emergency Plan

First Step:

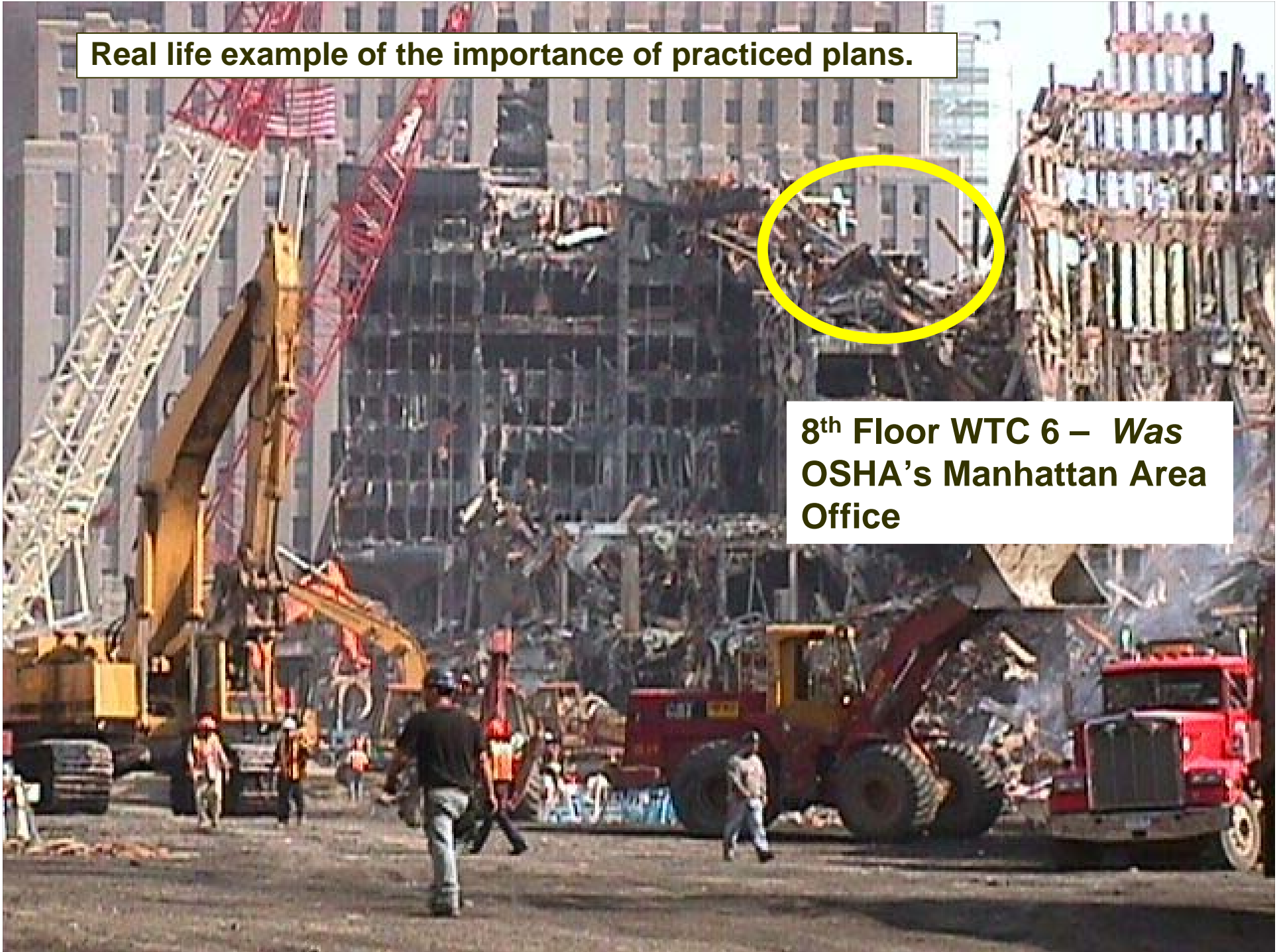
- ❖ Identify people with unique needs and incorporate their specific needs into an emergency action plan.

How?

- ❖ Include all employees in emergency planning activities and practice drills.
 - ❖ Drills should vary in type and time of day and pose a variety of roadblocks.

Proactive efforts will identify the needs and resources to respond calmly when immediate action is necessary.

Real life example of the importance of practiced plans.



**8th Floor WTC 6 – Was
OSHA's Manhattan Area
Office**



State of the Union for Americans with Disabilities in 2005

Disability Status: 2000 - Census 2000 Brief

- **50 million Americans have a disability.**
 - 33 million of working age.
- **“In case of a terrorist attack, or other crisis at work, have plans been made for safe evacuation?”**
 - **57% of workers with disabilities say YES**
 - **43% of workers with disabilities say NO**

Harris Interactive Inc., 2005

continued



State of the Union for Americans with Disabilities in 2005

Disability Status: 2000 - Census 2000 Brief

- **Disabled workers are still far more anxious and concerned about their personal safety than non-disabled workers.**
 - **15% were extremely or very anxious, compared to 8%.**
 - **40% were more concerned compared to 33%.**
- **Efforts to design and implement disability specific disaster planning does make an impact at work.**



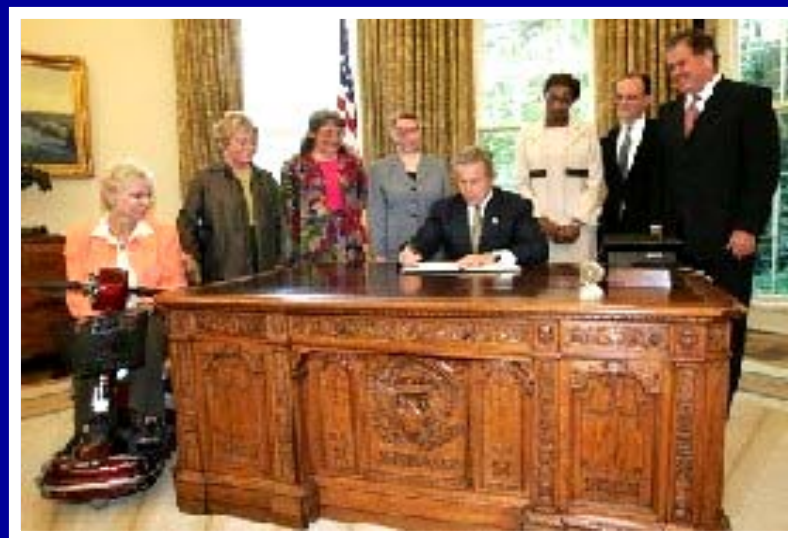
National Organization
on Disability

Remarks at the National Hurricane Conference Dept. of Homeland Security April 14, 2006

- **45% of people in New Orleans who had to be evacuated to the Astrodome were connected to disability.**
- **No access to the vital flow of information for people identified as deaf or hard-of-hearing.**

The Federal Response for Individuals with Disabilities in Emergency Preparedness:

- Established the government's role in support of individuals with disabilities in disasters and acts of terrorism.
- Created the “Interagency Coordinating Council (ICC) on Emergency Preparedness and Individuals with Disabilities” to address these critical issues.



Presidential Executive
Order 13347
(issued July, 2004)

ICC Achievements

A Framework of Emergency Preparedness Guidelines

Preparing the Workplace for Everyone: Accounting for the Needs of People with Disabilities

(July 2005)



A tool for emergency planners, managers and employees to assist in developing, implementing and maintaining emergency plans that include employees with disabilities.

ICC Recommendations

Key Recommendations include:



- 1. Increase participation of people with disabilities in emergency planning, preparedness, response and recovery drills and exercises.**
- 2. Provide effective audio, visual and or tactile protocols and technologies related to emergency preparedness, alerting, warning and response for individuals with disabilities.**

Unique Workplace Challenges

Challenges Include:

- Receiving emergency notifications
- Evacuating safely in an emergency
- Receiving training
- Receiving communications
- Responding to workplace safety hazards

What is OSHA's Role?

- **OSHA standards address emergency planning requirements.**
- **OSHA publishes Safety and Health Information Bulletins (SHIBs.)**

Safety and Health Information Bulletins

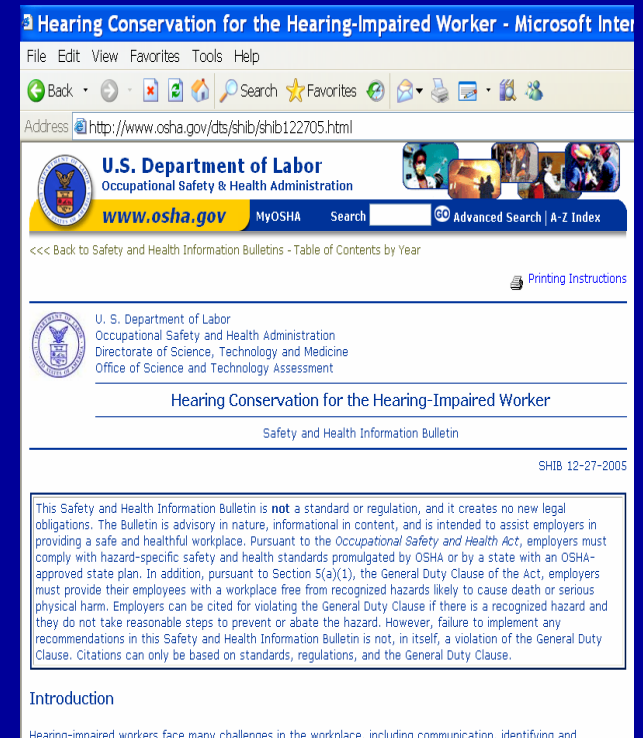
SHIBs:

1. Innovative Workplace Safety Accommodations for Hearing-Impaired Workers
July, 2005

2. Hearing Conservation for the Hearing-Impaired Worker
January, 2006

Highlights needs of hearing-impaired workers:

- *28 million Americans have hearing loss*
- *Numbers will increase*



The screenshot shows a Microsoft Internet Explorer browser window displaying the OSHA website. The address bar shows the URL: <http://www.osha.gov/dts/shib/shib122705.html>. The page header includes the U.S. Department of Labor logo and the text "Occupational Safety & Health Administration" and "www.osha.gov". Below the header, there is a navigation bar with "MyOSHA", a search box, and "Advanced Search | A-Z Index". The main content area features the title "Hearing Conservation for the Hearing-Impaired Worker" and "Safety and Health Information Bulletin". A disclaimer box states: "This Safety and Health Information Bulletin is not a standard or regulation, and it creates no new legal obligations. The Bulletin is advisory in nature, informational in content, and is intended to assist employers in providing a safe and healthful workplace. Pursuant to the Occupational Safety and Health Act, employers must comply with hazard-specific safety and health standards promulgated by OSHA or by a state with an OSHA-approved state plan. In addition, pursuant to Section 5(a)(1), the General Duty Clause of the Act, employers must provide their employees with a workplace free from recognized hazards likely to cause death or serious physical harm. Employers can be cited for violating the General Duty Clause if there is a recognized hazard and they do not take reasonable steps to prevent or abate the hazard. However, failure to implement any recommendations in this Safety and Health Information Bulletin is not, in itself, a violation of the General Duty Clause. Citations can only be based on standards, regulations, and the General Duty Clause." Below the disclaimer, the section "Introduction" begins with the text: "Hearing-impaired workers face many challenges in the workplace, including communication, identifying and".

www.osha.gov

Impact of Hearing Loss on Workplace Safety

Concerns of Hearing-Impaired Workers

- Understanding verbal warnings or instructions
- Hearing emergency notification alarm systems
- Being able to communicate if they are trapped
- Following conversation at meetings
- Localizing sound to detect an approaching forklift
- Hearing the telephone ring/conversing on the phone
- Understanding the instructor in training sessions
- Trying to take notes and listen at the same time

Workplace Accommodations

- **Implementing workplace accommodations for disabled workers will help all workers feel safe.**
- **Choose the option or combination that works best for each individual situation with regard to:**
 - * **Alerting devices**
 - * **Training/communication accommodations**
 - * **Safety accommodations**

Alerting Device Options

Auditory, Visual and/or Tactile

Alerting devices include:

- **Flashing exit signs**
- **Flashing strobe lights**
- **Vibrating smoke alarms**
- **Vibrating pagers**
- **Amplified telephone ring signalers**
- **TTY/TDD telephone for hearing-impaired**
- **Flashlight for signaling location**
- **Buddy support network**
- **Hearing dogs**

Training/Communication Options

- **Communication is essential to emergency preparedness and to creating a safe workplace culture.**



Communication to employees with disabilities must be as effective as those to non-disabled employees.

The “how to” may be a challenge for employers

Critical Questions about Communication

- **Is emergency preparedness information communicated with the same frequency and level of detail to all employees?**
- **Are services provided when necessary for communication with deaf or hard of hearing employees?**
 - **Use of assistive listening devices, CART, sign language interpreters**
- **Is information on emergency preparedness easy to locate and available in text version; are there text descriptions for images, graphics and charts?**
- **Is information accessible to blind/low vision employees who use screen readers, or those who may use speech recognition technology?**
- **Are emergency preparedness training sessions and meetings in accessible locations?**

*Preparing the Workplace for Everyone,
July 2005*

Training accommodations include:

- **Captioned videos**
- **TTY video conferencing**
- **Computer assisted notetaking**
- **Communication Access Realtime Translation**
- **Assisted Listening Devices**
- **Sign language interpreter**
- **Telecommunications Relay Service**

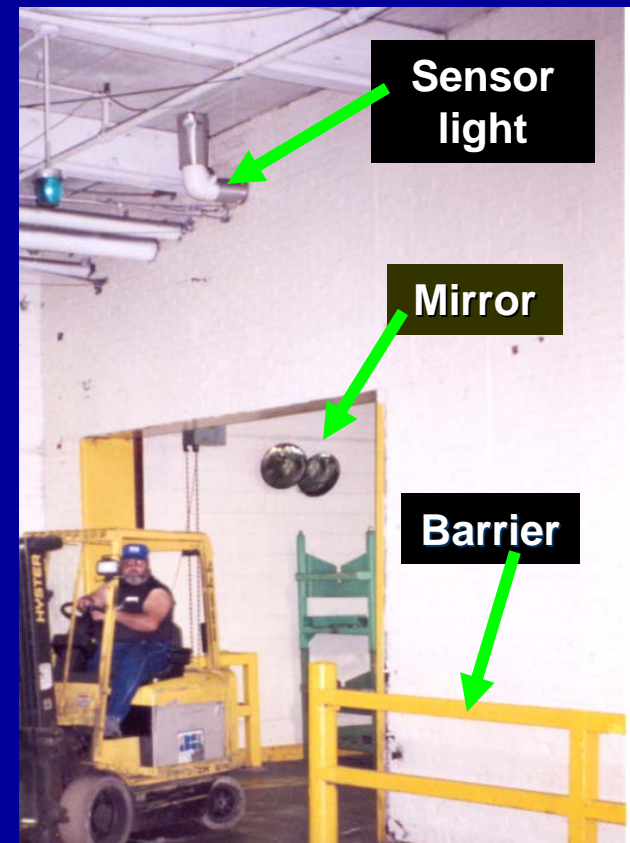


Workplace Safety Issues and Accommodations

Issue: not being able to hear approaching powered industrial trucks or other moving equipment.

Suggested accommodations:

- Designate a path with paint, rope, or tape
- Separate entrances for people and forklifts
- Require moving equipment to stop at all intersections
- Install directional warning sensor lights
- Install mirrors at all intersections
- Place a vibrating pager in vehicle and on employee
- Use of high visibility vests in high traffic areas



Other Hearing Conservation Issues related to Hearing-Impaired Workers:

Issue:

- **Hearing-impaired workers may have difficulty using conventional hearing protectors that are worn by the majority of the workforce because these protectors may reduce the incoming sound below their ability to hear it.**
 - **Sounds may seem distorted and muffled, making communication difficult**

Remedy:

- **Specialized hearing protectors exist that help with communication in noisy situations and be able to hear warning signals without overexposure to dangerous noise levels.**

Continuation of special hearing conservation issues

Issue:

- **Wearing hearing aids in high noise areas:**
 - **Concern is that since hearing aids amplify both speech and noise, wearing hearing aids alone without additional protection can lead to overexposure.**

Remedy:

- **On a case-by-case determination, hearing aids can be worn under an earmuff.**

Challenge

- **Protecting hearing-impaired workers from suffering additional hearing loss in noisy work environments is a challenge.**

They need to:

- ✓ **Be able to communicate**
- ✓ **Hear warning signals**
- ✓ **Hear approaching moving equipment or trucks**
- ✓ **Feel safe on the job.**

Conclusion

Preparedness and a safe workplace culture for all workers including those with disabilities can only be achieved through:

- **Planning**
- **Providing information**
- **Receiving input from all workers**
- **Providing accommodation choices**
- **A commitment from management**
- **Implementing the preparedness plan**
- **Practicing the preparedness plan**

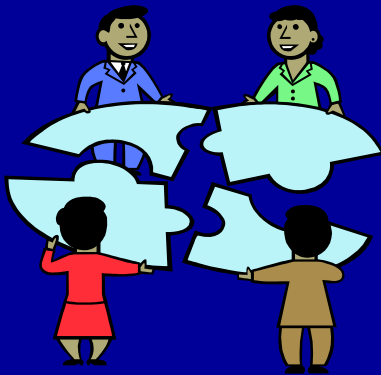


Handout Material

Supplemental Information

Additional ICC Achievements

1. National Security Emergency Preparedness Telecommunications Service Priority:



Ensures restoration of telecommunication services after a disaster for people with hearing and speech disabilities, and enforces the Federal Communications Commission's (FCC) Access to Emergency Information Rules.

ICC Achievements

2. Disability Preparedness Resource Center website (July, 2005)

Consolidates information on emergency preparedness and response for individuals with disabilities and emergency planners, first responders and service providers at www.dhs.gov/disabilitypreparedness

3. Enforcement of the ADA Access to Local Community Emergency Preparedness and Response Program:

Ensures that local government emergency management programs address needs of persons with disabilities.

ICC Achievements

4. Emergency Preparedness Grant-

A model emergency preparedness community education program to serve people who are deaf, hard-of-hearing or blind.

5. Emergency Preparedness NOW:

A quarterly newsletter that features effective emergency preparedness practices and spotlights individuals who make an impact on emergency preparedness for individuals with disabilities. (July, 2005)

ICC Recommendations

- 1. Increase participation of people with disabilities in emergency planning, preparedness, response and recovery drills and exercises.**
- 2. Provide effective audio, visual and or tactile protocols and technologies related to emergency preparedness, alerting, warning and response for individuals with disabilities.**
- 3. Integrate needs of individual with disabilities into the National Response Plan (NRP) and the National Incident Management System.**
- 4. Provide effective audio, visual and or tactile protocols and technologies related to emergency preparedness, alerting, warning and response for individuals with disabilities.**

Disaster Preparedness TIPS for Personal Supplies

If You Are Deaf or Have a Hearing Loss:

- **Have a small portable battery-operated television set. Emergency broadcasts may give information in American Sign Language (ASL) or open captioning.**
- **Keep pads and pencils in your home supply kit and in your car. Have them with you at all times for communication.**
- **Keep a flashlight, whistle (or other noisemaker) and pad and pencil by your bed.**
- **Keep a card in your disaster supplies kits and with you at all times that indicates that you are deaf. Include any other appropriate communication information such as, "I do (or do not) know American Sign Language (ASL)," or, "My service animal may legally remain with me."**

www.prepare.org/disabilities/disastersupplies.htm

Federal Agency Resources Public Education Websites

- Department of Labor www.dol.gov
 - ODEP – Office of Disability Employment Policy
www.dol.gov/odep/programs/emergency.htm
- Department of Homeland Security www.disabilitypreparedness.gov
- Department of Justice www.justice.gov
 - Disability Rights Section
 - ADA Information Services www.ada.gov
- Disability Information: www.disabilityinfo.gov
- National Institute for Occupational Safety and Health
www.cdc.gov/niosh/topics/

Federal Agency Resources Public Education Websites

- The Access Board www.access-board.gov
 - Independent Federal Agency
- Department of Commerce www.doc.gov
 - National Oceanic and Atmospheric Administration
www.noaa.gov
- Department of Transportation www.dot.gov
- Fire Administration www.usfa.gov
- Department of Education www.ed.gov
 - National Institute on Disability and Rehabilitation Research (NIDRR)
- Federal Communications Commission www.fcc.gov
 - For information on Telecommunication Relay Services

Other Resources

- **National Organization on Disability,** www.nod.org
- **Principal Emergency Response and Preparedness, Requirements and Guidelines,** OSHA publication 3122, 2004.
- **How to Plan for Workplace Emergencies and Evacuations,** OSHA publication 3088, 2001.
- **Online Emergency Assistance Information- OSHA's Emergency Preparedness and Response Page,** at www.osha.gov

Other Reference Material

- ❖ **Individuals with Disabilities in Emergency Preparedness, Executive Order 13347**
Annual Report, July 2005
Department of Homeland Security
- ❖ **A Framework of Emergency Preparedness Guidelines for Federal Agencies, Preparing the Workplace for Everyone, July 2005, ICC Subcommittee on Emergency Preparedness in the Workplace,(www.dol.gov/odep)**
- ❖ **U.S. Census Bureau, Census 2000 at www.census.gov/hhes/www/disability/disabstat2K/table1.html**