

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34

NENA TTY Phone Pal Program (PPP) Operational Information Document (OID)

An Outreach to the Deaf and Hard of Hearing Community



NENA TTY Phone Pals Program Operational Information Document
Document 52—501
July 29, 2004

Prepared by:
National Emergency Number Association (NENA) Accessibility Committee, TTY Training
Standards Work Group

Published by NENA
Printed in USA

35
36
37
38
39
40

**NENA
TTY PHONE PALS PROGRAM
OPERATION INFORMATION DOCUMENT**

41
42
43
44
45
46

NOTICE

47
48
49
50

This Operational Information Document is published by the National Emergency Number Association (NENA) as an information source for the voluntary use of communication centers and is provided as an example only. It is not intended to be a complete operational directive.

51
52
53
54

NENA reserves the right to revise this for any reason including, but not limited to, conformity with criteria or standards promulgated by various regulatory agencies, utilization of advances in the state of operational techniques or services described herein.

55
56
57
58
59
60
61

It is possible that certain federal, state or local regulations may restrict or require modification of the recommendations contained in this document. Therefore, this document should not be the only source of information used. NENA members are advised to contact their legal counsel to ensure compatibility with local requirements.

By using this document, the user agrees that NENA will have no liability for any consequential, incidental, special, or punitive damages arising from use of the document.

NENA's Committees have developed this document. Recommendations for change to this document may be submitted to:

National Emergency Number Association
1700 Diagonal Rd, Suite 500
Alexandria, VA 22314
202.466.4911
or commleadership@nena.org

ACKNOWLEDGEMENTS

62
63
64
65
66
67

The National Emergency Number Association (NENA) Operations Accessibility Committee has developed this document.

The following individuals are recognized for their contributions in development of this document.

Members	Employer
Lisa Dodson, Workgroup Chair	Harris County Sheriff's Department, TX
Teri Bloyd	North Central Texas Council of Governments
Patty Cross	Denco 9-1-1 District, TX
Toni Dunne	Positron Public Safety Systems
Cheryl Greathouse	Georgia Public Safety Training Center
Brenda Kelly Frey	State of MD/ MD Relay
Raymond Kenny	Washington Township Police Department
David Rosenthal	Kansas Relay Center, SBC Southwest

68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85

Additional Acknowledgements:

We would be remiss not to give special recognition to Kathy Walters, Communication Services for the Deaf (CSD); and Woody Glover, St. Tammany Parish Communications District. Both were the founders of the first TTY Phone Pal Program in the nation. Located in Tyler Texas, the now known as the Smith County 9-1-1 Communications District worked with the Texas Association of the Deaf's 9-1-1 committee to establish their PPP. These pioneers established a program that was extremely successful and many agencies have since implemented similar programs.

Recognition is also given to Patty McGeary, Sacramento Police Department and Chuck Berdan, Sacramento Regional Fire/EMS for sharing agreement forms with NENA.

Also appreciation is given to TDI (formerly known as Telecommunications for the Deaf, Inc.) for developing E.A.S.E. (Emergency Access Self Evaluation) training books, under a grant from the U.S. Department of Justice (93-CR-CX-0015), which includes the "Test Call Checklist" information described within this document.

86

87

Table of Contents

88	1 EXECUTIVE OVERVIEW	5
89	2 INTRODUCTION.....	5
90	2.1 PURPOSE AND SCOPE OF DOCUMENT	5
91	2.2 REASON TO IMPLEMENT.....	5
92	2.3 REASON FOR ISSUE/REISSUE.....	5
93	2.4 RECOMMENDATION FOR STANDARDS DEVELOPMENT WORK	6
94	2.5 COST FACTORS	6
95	2.6 ACRONYMS/ABBREVIATIONS.....	6
96	3 HOW TO START YOUR TTY PHONE PAL PROGRAM.....	6
97	3.1 DEVELOPING A STRATEGIC PLAN	7
98	3.2 PROGRAM DEVELOPMENT	7
99	3.2.1 <i>Program Coordinator</i>	7
100	3.2.2 <i>Implementation Timeline</i>	8
101	3.2.3 <i>Program Goals</i>	8
102	3.2.4 <i>Budget</i>	8
103	3.2.5 <i>Participating Agencies</i>	8
104	3.2.6 <i>Program Job Description</i>	9
105	3.2.7 <i>Community Input</i>	9
106	3.2.8 <i>Recruiting Volunteers</i>	9
107	3.2.9 <i>Test Call Volunteer Agreement</i>	10
108	3.2.10 <i>Standardized Test Call Policy and Procedure</i>	10
109	3.2.11 <i>Reporting Procedures</i>	11
110	3.2.12 <i>Quality Assurance Guidelines</i>	11
111	3.3 TRAINING.....	12
112	3.3.1 <i>Volunteer Training</i>	12
113	3.3.2 <i>Communications Personnel</i>	13
114	3.4 PROGRAM IMPLEMENTATION	15
115	3.5 READY...SET...GO? MORE THINGS TO THINK ABOUT!.....	16
116	3.5.1 <i>Contingency Plans</i>	16
117	3.5.2 <i>Official ID</i>	16
118	3.5.3 <i>Assumption is not 'Divine'</i>	16
119	3.5.4 <i>"Feeding of the Volunteers"</i>	16
120	3.5.5 <i>Access is the Word</i>	16
121	3.5.6 <i>Patience is a Virtue!</i>	16
122	4 REFERENCES.....	17
123	5 EXHIBITS	17
124		
125	EXHIBIT A	TTY "PHONE PALS" TEST CALL LOG SAMPLE
126	EXHIBIT B	SAMPLE TEST CALL/PSAP OBSERVATION CHECKLIST
127	EXHIBIT C	SAMPLE VOLUNTEER AGREEMENT
128	EXHIBIT D	TESTIMONIALS

129 **1 Executive Overview**

130 This Operational Information Document (OID) introduces a program that will assist PSAP managers
131 in their efforts to ensure equipment functionality and enhance call taker proficiencies where it
132 concerns utilizing TTYs (also known as TDD – Telecommunications Device for the Deaf). In
133 addition, this document provides the framework and outline format for establishing this type of
134 program.

135 The term “Phone Pals” was coined in Texas some years ago for their TTY testing program, but, like
136 many brand names, the words have become a generic description of any program where the PSAP
137 works with the Deaf community. So no matter what it is called in your area or what you want to call
138 it, this paper is addressing the need for the PSAP to reach out to the Deaf and Hard of Hearing
139 community, and assure them that 9-1-1 works for them. And it helps the PSAP to do a better job.

140 From one agency that implemented the Phone Pals Program (PPP) - “Our staff got extra training in
141 TTYs and our hearing impaired community gained the confidence that both their emergency and
142 non-emergency calls would be answered and handled as any other call.”

143 Regardless of whether you are a two-position PSAP or are responsible for a bigger 9-1-1 network
144 with multiple PSAPs.... this program can work for you!

145 **2 Introduction**

146 **2.1 Purpose and Scope of Document**

147 The TTY Phone Pal Program is one method that can be used to meet federal mandates. This OID
148 provides information from getting organized and finding volunteers to training issues and keeping
149 the program going.

150 The concept is very simple. TTY Phone Pal volunteers make weekly test calls to the PSAP. These
151 calls are made randomly (tones/silent and varying times) to each shift. The calls are kept short so as
152 not to interfere with any emergency calls. The caller always immediately informs the dispatcher that
153 it is a test call, and if the dispatcher cannot take the call at that time (being sure it is a test first), s/he
154 simply hits a canned message or types “BUSY SK”. The TTY user then disconnects, documents, and
155 tries again later. A typical TTY test call should not take more than a couple of minutes.

156 **2.2 Reason to Implement**

157 The U.S. Department of Justice (DOJ) requires PSAPs to consult with and outreach to people with
158 disabilities. Implementing this program may assist communication centers in their efforts towards
159 providing quality services. If for no other reason, having this program in place could mean the
160 difference between life and death for a caller when a true emergency TTY call is received at your
161 PSAP.

162 **2.3 Reason for Issue/Reissue**

163 NENA reserves the right to modify this document. Whenever it is reissued, the reasons will be
164 provided in the table below.

Document Number	Approval Date	Reason For Changes
NENA 52-501	07/29/2004	Initial Document
NENA 52-501.1	07/13/2015	Update Links

165 **2.4 Recommendation for Standards Development Work**

166 No operational or technical standards development work is needed to implement a TTY Phone Pal
167 Program (PPP); however, such a program may be used to enhance ADA (Americans with
168 Disabilities) compliance efforts.

169 **2.5 Cost Factors**

170 The cost associated with the PPP is variable. At your discretion, you may wish to provide
171 honorariums to the PPP volunteers, or simply say thank you by providing refreshments at meetings.
172 As you read more about the program and how you can tailor it to meet your agency needs, you will
173 then be able to make some assessments related to cost factors.

174 It should be noted, however, that it is the PSAP responsibility to provide sign language interpreters
175 for tours, meetings and workshops. Therefore, the agency must establish an appropriate budgeted
176 line item for communication access as provided for under the ADA.

177 **2.6 Acronyms/Abbreviations**

178 See NENA-ADM-000, NENA Master Glossary of 9-1-1 Terminology, located on the [NENA web](#)
179 [site](#) for a complete listing of terms used in NENA documents. All acronyms used in this document
180 are listed below, along with any new or updated terms and definitions.

181

The following Acronyms used in this document:	
ADA	Americans with Disabilities Act
OID	Operational Information Document
PPP	Phone Pal Program
SK	Stop Keying, abbreviation used when ready to hang up.

182 **3 How To Start Your TTY Phone Pal Program**

183 What comes first...the chicken or the egg? Sometimes that is difficult to define. This document
184 attempts to put the process in a logical order. However, this is NOT set in stone. You should manage
185 your process in a way that works for you!

186 Once you understand what the Phone Pal Program can do for you, you are ready to tackle the many
187 facets involving in establishing a program. This will require some preliminary work, as well as “real-
188 time” efforts.

189

190

191 **3.1 Developing a Strategic Plan**

192 As with any other major undertaking, the development of a local Phone Pal Program should begin
193 with creating a strategic plan for development, implementation, maintenance and evaluation of the
194 local program. Strategic planning provides for a well-defined approach to program implementation
195 and can serve as an effective communications tool for all participants within the program.

196 A strategic plan for the development of a Phone Pal Program may include the following objectives:

197 **Program Development**

- 198 1. Identify/appoint a Phone Pal Program Coordinator and establish an implementation
199 timeline.
- 200 2. Identify and develop Phone Pal Program goals and budget requirements.
- 201 3. Identify participating agencies in the Phone Pal Program.
- 202 4. Establish a written job description for program volunteers.
- 203 5. Schedule/attend a community meeting with citizens who are deaf and/or hard of hearing
204 to solicit their input concerning your Phone Pal Program.
- 205 6. Identify participating volunteers for the Phone Pal Program.
- 206 7. Develop a test call volunteer agreement.
- 207 8. Develop standardized test call policy and/or procedures.
- 208 9. Develop reporting forms, test call logs and submission guidelines required of program
209 volunteers.
- 210 10. Develop quality assurance guidelines for the Phone Pal Program to include problem
211 reporting, problem resolution and program status reports.

212 **Training**

- 213 1. Develop training program for participating volunteers.
- 214 2. Identify training delivery methods of participating volunteer training.
- 215 3. Develop training program for communications personnel.
- 216 4. Identify training delivery methods for communications personnel.

217 **Implementation**

- 218 1. Establish a program implementation date.
- 219 2. Evaluate the success of the initial test calls and the effectiveness of test call procedures
220 and reporting guidelines.
- 221 3. Modify program to address any identified problems/deficiencies.
- 222 4. Communicate to all participants any necessary changes to the program.
- 223 5. Monitor and report monthly progress of the Phone Pal Program.
- 224 6. Identify additional/new volunteers as necessary.
- 225 7. Train all new communications personnel as hired.

226 **3.2 Program Development**

227 **3.2.1 Program Coordinator**

228 Any agency considering the establishment of a Phone Pal Program should identify and appoint one
229 staff person to serve as a program coordinator. The program coordinator should have a thorough

230 knowledge of the emergency telephone system, TTY equipment, call handling procedures, disability
231 awareness and interaction etiquette. The requisite skills required of a program coordinator should
232 include clear verbal and written communications skills, organizational skills, time management and
233 leadership. When choosing a program coordinator, agencies should also consider the significant
234 amount of time, which must be dedicated to the development, training, and implementation of the
235 Phone Pal Program. Once the program is successfully established, the amount of monthly-dedicated
236 time is likely to be reduced but not completely diminished.

237 **3.2.2 Implementation Timeline**

238 Once a program coordinator has been appointed, the agency should establish a timeline for program
239 implementation. The amount of time for program implementation will vary from agency to agency
240 and will be influenced by the size of the agency, the number of people to be trained and the other job
241 duties for which the program coordinator may be responsible. Ideally, any agency should be able to
242 fully implement the program in one year.

243 **3.2.3 Program Goals**

244 Each agency should establish their own goals related to their Phone Pal Program. However, as a
245 guideline, the following universal goals are being provided:

- 246 1. To establish an outreach program to inform our deaf and hard of hearing citizens of the
247 procedures used by emergency telephone service agencies to handle calls via a TTY during
248 emergency situations.
- 249 2. To garner participation and support for our organization's mission from our citizens who are
250 deaf and hard of hearing.
- 251 3. To build trust in our organization's commitment and ability to provide direct and equal access
252 to our emergency services to people who use TTY's to communicate.
- 253 4. To provide our communications personnel the opportunity to train and prepare themselves for
254 handling TTY emergency calls and be better informed about the needs of our citizens who
255 are deaf and hard of hearing.
- 256 5. To ensure maintenance of our TTY equipment for emergency call handling and the
257 effectiveness of our emergency call taking procedures.

258 **3.2.4 Budget**

259 The fiscal impact of establishing a Phone Pal Program will vary depending on the agency size,
260 available resources, and number of volunteers. However, agencies should be prepared for initial
261 expenditures related to hosting meetings, printing, refreshments, postage for mailings and interpreter
262 services. Continuing costs will be necessary for printing reporting forms/logs and postage. Ideally,
263 there should be no out-of-pocket costs to your program volunteers.

264 **3.2.5 Participating Agencies**

265 It is preferable that all primary and secondary public safety answering points within specified
266 jurisdictions participate in an established Phone Pal Program either individually or collectively. The
267 key to the effectiveness of the program is participation from our citizens with our communications
268 personnel, rather than testing only being accomplished internally among communications personnel.

269 Other agencies may be considered for participation in this program such as local agencies and
270 advocacy organizations that serve people who are deaf and hard of hearing.

271 **3.2.6 Program Job Description**

272 The volunteers should be provided with a detailed explanation as to what is expected of them in
273 terms of participation and program reporting. Test call procedures should be clearly defined in easy-
274 to-understand, step-by-step procedures. A training class and/or final meeting should be provided to
275 allow volunteers to have any questions answered by the program coordinator. Additionally, the
276 volunteers should be provided direct non-emergency contact information for both the program
277 coordinator and/or communications shift supervisors so that they may have any subsequent questions
278 readily addressed.

279 **3.2.7 Community Input**

280 The core mission of the Phone Pal Program is to outreach to the deaf and hard of hearing
281 community. It is essential that agencies planning to implement a Phone Pal Program meet with
282 representatives of the deaf and hard of hearing community to explain what the agency is trying to
283 accomplish and to garner input and support for the program. This meeting would also be an excellent
284 opportunity to educate citizens about the emergency telephone system.

285 Remember, agencies will be responsible for providing interpreters and need to be prepared to
286 provide any printed material in alternative formats such as audiotape, large print and Braille.

287 **3.2.8 Recruiting Volunteers**

288 The key to recruitment will be to find the "gatekeepers" of the community. This will be a person or
289 people who are considered leaders within the community and have attained respect from those they
290 work and socialize with.

291 You will need to explain WHAT you are trying to accomplish before asking whom they would
292 recommend. You may need to allow your first contact to help you recruit. In other words, you may
293 not be given direct contact information immediately. So be prepared to leave the information and
294 wait for someone to contact you. Where to start may be a challenge. Consider the following agencies
295 and organizations for a kick-start:

- 296 • State Agencies that have services for the Deaf and Hard-of-Hearing and Deaf-Blind
- 297 • Organizations of the Deaf
- 298 • Deaf Clubs
- 299 • Associations of the Deaf
- 300 • Interpreting Services Agencies
- 301 • Independent Living Centers (sometimes referred to as Centers for Independent Living)
- 302 • Churches providing services for the Deaf
- 303 • Schools and Universities that serve the Deaf

304 Another approach would be to ask permission to be put on a meeting agenda, where you could
305 explain about 9-1-1 services and the Phone Pal Program before soliciting volunteers.

306 Always be prepared to provide for Interpreting Services although some organizations may provide
307 interpreters for you. Depending on the location and length of the presentation, you may be required
308 to contract 1-2 interpreters. Check with your local interpreter providers for policies and cost so that
309 you can budget accordingly.

310 The community meeting, in addition to opening the lines of communications between public safety
311 and citizens, provides an opportunity to begin recruiting volunteers for the Phone Pal Program.
312 When planning the community meeting, agencies should have the appropriate volunteer agreement
313 forms and volunteer job descriptions available for potential volunteers to take with them and use as a
314 resource in deciding if they want to volunteer. Agencies should provide information on how and
315 where to return the forms.

316 **3.2.9 Test Call Volunteer Agreement**

317 For any agency creating a Phone Pal Program, consideration must be given to how formal the test
318 call volunteer agreement should be. Some agencies prefer a very complex legal document while
319 others have a less formal agreement. It is important for all parties to have a clear understanding of
320 the program guidelines and a written agreement is the most appropriate format to accomplish this. A
321 sample formal volunteer agreement is attached in Appendix C.

322 **3.2.10 Standardized Test Call Policy and Procedure**

323 The Phone Pal Program needs to establish standardized policies and procedures for how all test calls
324 will be conducted. These procedures should address how test calls will be terminated during busy or
325 high call volume times as well as how the test call will proceed under normal circumstances. Below
326 is a sample of how the test call procedure may read:

- 327 1. You may make test calls by dialing 9-1-1 or xxx-xxxx (the administrative line).
- 328 2. Test calls can be made any time during the day or night, although we suggest that no test
329 calls be made between 4:30 and 5:30 p.m. (or your time specific busy hour).
- 330 3. Once 9-1-1 has been dialed, you can tap a key on the TTY keyboard several times and wait
331 for the PSAP to answer with a canned message, such as 911 WHAT IS YOUR
332 EMERGENCY Q GA.
- 333 4. You should immediately identify yourself and tell them "THIS IS A TEST CALL". This will
334 work the same way if the test call is being made on the administrative phone line.
- 335 5. Remember, communications personnel will type "BUSY SK" if they are taking too many
336 emergency calls to participate in the test call or, if in the middle of the test call, they become
337 too busy with emergency calls.
- 338 6. Make a test call last only a few minutes. We want the dispatchers to become familiar with
339 using the TTY, but it is also important to understand that they have other job duties as well.
- 340 7. Following an agreed upon time frame, where you are tapping a key to notify the call taker it
341 is a TTY call, begin random "silent calls." This is where you dial 9-1-1 and do NOT tap a
342 key. Call takers are required to check a "silent call" with their TTYs. At this point you will
343 document if you tapped a key or it was a "silent call."
344

345 **3.2.11 Reporting Procedures**

346 As part of the program, volunteers will be asked to complete test call logs and other reporting forms.
347 These forms should be provided to the volunteers by the agency.

348 **3.2.11.1 Reporting**

349 Each agency implementing a Phone Pal Program should create reporting forms that meet the needs
350 of their program. Some agencies will only want to capture the information found on the sample test
351 call log. However, consideration may be given to development of more detailed forms for reporting
352 problems that occur during test calls. Some problems may be procedural and while others may be
353 equipment related. Agencies should establish procedures for problems to be reported more
354 immediately than the monthly submission of the test call logs, when appropriate, and agencies
355 should address the problems and document their solutions.

356 Some agencies may also prefer to keep an internal log of TTY test calls in addition to those
357 completed and submitted by the volunteers. This will help identify call takers or positions that may
358 not be participating in the random test calls.

359 **3.2.11.2 Test Call Logs**

360 Test call logs are appropriate for all test calls. Agencies may choose what information they would
361 like the volunteers to capture but it is recommended that the following minimum information be
362 logged:

- 363 • Name of the Volunteer
- 364 • Date of the Test Call
- 365 • Time of the Test Call
- 366 • Name/Position of the Call Taker
- 367 • Comments

368 Some agencies may also want to collect the following details in addition to the abovementioned
369 information:

- 370 • Time call was answered
- 371 • Time call was connected via TTY
- 372 • How the TTY call was identified (silent or tones)
- 373 • TTY protocol used

374 **3.2.11.3 Submission Procedures**

375 It is recommended that test call logs be submitted to the Program Coordinator on a monthly basis
376 unless problems are noted. Agencies should establish a submission date and provide all volunteers
377 with the necessary reporting forms, envelopes and postage to participate in this program.

378 **3.2.12 Quality Assurance Guidelines**

379 As with any program, quality assurance is an essential part of qualifying and documenting program
380 success. In addition to documenting the test calls, an agency should initiate quality assurance
381 procedures, which include the following areas:

382 **3.2.12.1 Problem Reporting**

383 When problems are encountered during test calls, volunteers should be given procedures and contact
384 numbers for immediately notifying either the Program Coordinator or the on-duty shift supervisor.

385 **3.2.12.2 Problem Resolution**

386 Agencies should document the identified problems and their subsequent solutions. If the problem is
387 technical, efforts must be undertaken immediately to repair the problem or to provide back-up access
388 at that position. If the problem is procedural error on the part of the communications personnel
389 taking the call, shift supervisors should immediately counsel the call taker on the errors and how to
390 properly handle TTY calls.

391 **3.2.12.3 Program Status Reports**

392 As with any program, volunteers may lose their motivation to participate if they do not receive
393 feedback as to the importance of what they are doing. It is advisable for agencies that implement a
394 Phone Pal Program to compile the monthly reports from all volunteers and provide program status
395 reports to the volunteers and any other interested parties. The program status report should
396 communicate the successes of the test calls, any problems identified and their solutions.
397 Consideration may also be given to include information on real TTY calls. Ideally, this feedback
398 would be provided on a quarterly, semi-annual or annual basis.

399 **3.3 Training**

400 Essential to program success is well-trained volunteers and communications personnel who
401 understand the program's goals and procedures. Through training, an agency can foster trust and
402 support for the program.

403 **3.3.1 Volunteer Training**

404 Training for your program volunteers should include a basic level of understanding about 9-1-1 and
405 how it works. Topics may include:

- 406 • 9-1-1 Terms (Glossary for reference)
- 407 • History of 9-1-1
- 408 • 9-1-1 Automatic Number Identification (ANI) & Automatic Location Identification (ALI)
- 409 • 9-1-1 Call Taking Procedures
- 410 • TTY equipment used by the agency
- 411 • 9-1-1 TTY Program Description
- 412 • 9-1-1 TTY Test Call Procedures
- 413 • Test Call Log
- 414 • Info on Emergency Procedures used by the Relay service

415

416

417

418 The following methods of training delivery have been successfully accomplished in Texas and other
419 states.

420 **On Individual Basis**

421 This would be where the organizer of the Phone Pal program conducts one-on-one training
422 for someone who joins the group late or needs a refresher course.

423 **Committee Workshops**

424 Training provided in this format is comprehensive. This provides not only opportunity to
425 update on issues and refresh memories, but it gives the committee members a chance to
426 interact and learn from each other as to what is working in the respective areas. It is
427 suggested to be structured over 1-2-days and be conducted once a year.

428 In some areas, grants were obtained to cover the entire cost of bringing in all committee
429 members to a central location.

430 **Regional and Statewide Training (Deaf Community AND 9-1-1 Personnel)**

431 This training is important for both the committee and 9-1-1 personnel to be able to interact
432 face-to-face. Each group learns more about each other and therefore, improves relations and
433 the success of the program. It could be held in conjunction with a state APCO or NENA
434 conference.

435 **3.3.2 Communications Personnel**

436 The ADA mandates that public entities provide emergency telephone services to persons with
437 disabilities, which is direct and equal to services provided to others. To accomplish this, the
438 following information has been gleaned from industry training standards:

439 Each agency must provide initial comprehensive training to those personnel who may have contact
440 with individuals from the public who are deaf, hard of hearing, or who have speech impairment. It is
441 desirable that personnel do not take calls from the public alone prior to the successful completion of
442 TTY training in accordance with this standard.

443 **Initial Comprehensive Training**

444 Comprehensive training includes, but is not limited to include the following:

445 **Legislation/Regulations**

- 446 • Americans with Disabilities Act
 - 447 ○ Title II – Public Services
 - 448 ○ Department of Justice Requirements
 - 449 ○ Self-Evaluation (Title II, § 35.105 Self-evaluation)
 - 450 ○ ADA Coordinator/Updated Procedures/Future Technologies
- 451 • Section 504 of Rehabilitation Act
- 452 • Local/State Regulations
- 453 • Liability and Penalties for Non-Compliance
- 454 • References

455 **Communications Issues**

- 456 • Deaf/HOH/Deaf Blind/Speech Impaired
- 457 • ASL v. English
- 458 • Assistive Devices
- 459 • Public Education & Outreach/Advocacy
- 460 • References

461 **Equipment**

- 462 • PSAP Equipment
 - 463 ○ Stand alone
 - 464 ○ Integrated
 - 465 ○ Detection Equipment
 - 466 ○ Database Records
 - 467 ○ Testing/Documentation
 - 468 ○ Troubleshooting
- 469 • Consumer Equipment
 - 470 ○ Stand alone
 - 471 ○ Cellular compatible
 - 472 ○ Portable/Compact Units
 - 473 ○ References

474 **Call Handling**

- 475 • Call Recognition
- 476 • Protocol
- 477 • Abbreviations
- 478 • Language Examples
- 479 • Answering the Call
- 480 • Making the Call
- 481 • Third party Calls/Telephone Relay Services
- 482 • VCO/HCO
- 483 • Call transfers/monitoring
- 484 • Troubleshooting
- 485 • Documentation
- 486 • References

487 **Practical Instruction & Testing**

- 488 • Scenario Based
- 489 • Quality Assurance
- 490 • Documentation
- 491 • References (TTY Call Handling Proficiency and Quality Assurance Standard)
- 492
- 493

494 **Refresher Training**

495 Each agency must provide refresher training at least as often as they require or offer training for
496 voice calls, but at a minimum, every six months. Note the U.S. Department of Justice Technical
497 Assistance (TA) for 9-1-1 Document. This standard may be accomplished in a variety of methods, to
498 include but not limited to:

- 499 • Role Call Briefings
- 500 • Memorandums
- 501 • Test Call Programs
- 502 • Refresher Training Courses
- 503 • Comprehensive Training Courses

504 Each agency must conduct an annual review of training materials in order to keep abreast of changes
505 that may impact the provision of accessible services.

506 **3.4 Program Implementation**

507 After the program is developed and the training has been completed, an agency will be ready to
508 implement the Phone Pal Program. It is recommended that implementation be completed in phases.

509 **Implementation Date**

510 The agency should establish an implementation date, which is provided to all volunteers and
511 communications personnel. This is the date that the test calls will begin.

512 **Evaluate Initial Test Calls**

513 The agency should plan to immediately evaluate how the test calls, test call procedures and
514 reporting guidelines worked after the initial test calls are completed.

515 **Program Modifications**

516 Once the test calls are completed, any necessary modifications should be made to the
517 program procedures and guidelines. ALL changes must be communicated to all volunteers
518 and all communications personnel.

519 **Monthly Program Status**

520 The Program Coordinator should be responsible for compiling and monitoring the status of
521 the test call program on a monthly basis. Any identified problems should be addressed and
522 rectified immediately.

523 **Continuous Recruitment and Training**

524 The Program Coordinator should be responsible for continuous recruitment efforts to identify
525 additional volunteers to replace those who may end their participation in the program.
526 Arrangements will need to be made to provide new volunteers and new communications
527 personnel with training about the program as previously described.

528 **3.5 Ready...Set...Go? More Things to Think About!**

529 **3.5.1 Contingency Plans**

530 Although every effort has been made to ensure all aspects have been addressed, inevitably you will
531 encounter something that is an anomaly or that is unique to your jurisdiction. It may require program
532 modification “on the fly,” and following, documentation of such will better prepare the coordinator
533 when a review of the program is conducted.

534 **3.5.2 Official ID**

535 Consider providing volunteers with official department identification that shows their participation
536 as a Phone Pal. Efficiencies within dispatch occasionally produce officers at the door of a volunteer
537 during a test call process or immediately following. It has proven beneficial to have this in-hand,
538 particularly as communication barriers may exist.

539 **3.5.3 Assumption is not ‘Divine’**

540 Phone Pal volunteers are subject to true emergencies just as the general population, and personnel
541 should not become complacent when recognizing the ANI/ALI as a Phone Pal volunteer. Until the
542 caller announces the “test call,” treat as an emergency call.

543 **3.5.4 “Feeding of the Volunteers”**

544 In any organization made up of volunteers, who in many cases are unpaid and without any
545 substantial budget, it is important to provide motivation. Although this program provides a win-win
546 for PSAPs and the community, thanking them may not be enough. We must look for ways to keep
547 them motivated and to stay active on the committee. Some ideas that have been successfully
548 practiced are:

- 549 • Always have food during committee meetings (pizza, donuts, etc.)
- 550 • Provide 9-1-1 related giveaways to volunteers
- 551 • Create a Phone Pal T-Shirt and give to each volunteer
- 552 • Provide a ‘scholarship’ to 9-1-1 conferences for further training
- 553 • You may need to provide a TTY for the purpose of mobile testing

554 **3.5.5 Access is the Word**

555 Make sure the facility where you hold meetings are ADA accessible and conducive to visual
556 communications (i.e. position of speaker not backed to a window without drapes or blinds, etc.)

557 **3.5.6 Patience is a Virtue!**

558 As many will tell you, this is not a quick process, but the value it adds to your agency is without
559 question. Once implemented, you will be addressing the needs of your community with a quality
560 level of service.

561 **4 References**

562 E.A.S.E. (Emergency Access Self-Evaluation), TDI (formerly known as Telecommunications for the
563 Deaf, Inc.) copyright 1995, developed under a Department of Justice grant (93-CR-CX-0015).

564 Toni D. Dunne, ENP; former Chair of the Texas Association of the Deaf 9-1-1 Committee that
565 worked with the East Texas 9-1-1 District, first Phone Pal Program.

566 **5 Exhibits**

567 This section includes sample documents that can be used in a Phone Pal Program.

568 EXHIBIT A TTY "PHONE PALS" TEST CALL LOG SAMPLE

569 EXHIBIT B SAMPLE TEST CALL/PSAP OBSERVATION CHECKLIST

570 EXHIBIT C SAMPLE VOLUNTEER AGREEMENT

571 EXHIBIT D TESTIMONIALS

572

573

DRAFT

574
575
576
577
578
579

Exhibit A
TTY “Phone Pals” Test Call Log Sample

Test call logs can be as simple as this sample, or as complex as you deem necessary, to obtain the necessary information for ensuring quality services.

PHONE PAL NAME:		PSAP:
DATE:	DISPATCHER/POS.	COMMENTS

580
581
582
583
584
585
586
587
588
589
590
591
592
593
594
595

- PPP volunteers should make at least one call per week, and do so at different times, according to the program agreement.
- The Communications Center operates 24 hours a day; therefore the shift schedules should be attached.
- PPP volunteers will mail this form to the PSAP at the end of each month.
- For convenience, the PSAP may provide self-addressed stamped envelopes.
- The Communications Center should provide a non-emergency number for inquiries and/or if problems are discovered.

600 **PSAP Observation Checklist Legend**

601
602 The following items represent the columns on the PSAP Observation Checklist (above), and provide
603 further information on what should be documented within each category:

- 604
- 605 1) **Time call answered:** Document time of the first ring.
606
 - 607
 - 608 2) **Time call connected to TTY:** Document the time the TC connected to the TTY and
609 established communications.
610
 - 611
 - 612 3) **Time result:** Subtract column 3 from 4. This information will reflect how long it took the TC
613 to recognize the call as TTY and establish TTY contact.
614
 - 615
 - 616 4) **How TTY identified:** 1) silent, open line; 2) Baudot tones; 3) recorded announcement
617
 - 618
 - 619 5) **Call Handled:** Was it handled in-house, with another agency, transferred to another agency,
620 etc.
621
 - 622
 - 623 6) **TTY protocol used:** TC consistently and properly used GA, SK, etc. Answer Yes, No or
624 Some.
625
 - 626
 - 627 7) **Keeps caller informed:** This refers to letting the caller know what is happening. Answer
628 Yes, No or Some.
629
 - 630
 - 631 8) **Comments:** Use this section to report any problems discovered and note action taken to
632 remedy.
633
 - 634
 - 635 9) **Supervisor signature:** With this, the form can be kept as a record to indicate efforts made to
636 achieve compliance with the ADA.

637
638

639 **Exhibit C**
640 **Sample Volunteer Agreement**
641
642 When establishing your Phone Pal Program, and because making ‘false’ calls to 9-1-1 is illegal, you
643 will want to have the structure and guidelines written out for both the PSAP and the Volunteer.
644 This can be something very basic or something as complex as the legal agreement that is found
645 below. The agreement below was required as a result of previous legal actions taken against the
646 PSAP and they determined this to be prudent for their situation.
647 You must use your judgment as to whether your agency really needs to have a legal document.
648 However, reading it WILL help you develop your program structure and what needs to be discussed
649 with your volunteers by reviewing the Agreement below.

650
651 **Volunteer Agreement**
652 THIS AGREEMENT is made at (city), (state), as of _____ and between CITY OF _____
653 (“ENTITY”), AND _____, an individual (“VOLUNTEER”).

654 I. Recitals
655 WHEREAS, VOLUNTEER wishes to participate, without compensation, in Phone Pals, a
656 program using deaf volunteers to provide ENTITY’S Public Safety Answering Point staff
657 with more experience communication with deaf and hard of hearing in the use of the TTY
658 machine; and
659 WHEREAS, ENTITY wishes to have VOLUNTEER make test phone calls, with the use of a
660 TTY machine, to its Communication Center to assist ENTITY’S Public Safety Answering
661 Point staff to maintain their proficiency in the use of a TTY machine.

662 Now, therefore, it is agreed between the parties as follows:

663 II. Definitions
664 Public Safety Answering Point (PSAP): An answering location for 9-1-1 service calls
665 originating in a given area. A PSAP may be designated as primary or secondary which refers
666 to the order in which calls are directed to answering. Primary PSAPs respond first; secondary
667 PSAPs receive calls on a transfer basis and generally serve as an answering location for a
668 particular type of emergency call (i.e. fire or EMS). PSAPs are staffed by employees of a
669 common bureau serving a group of entities.

670 TTY Machine: A telecommunication device for deaf and hard of hearing people. It is
671 designed for the deaf and hard of hearing to communicate over telephone lines.

672 Test Call: A TTY initiated phone call by a volunteer to a PSAP to enable PSAP staff to
673 maintain proficiency in the uses of the TTY machine.

674 Test Call Log: Written documentation of test calls made by a volunteer to a PSAP (see
675 samples).

676 III. Agreement

677 A. Responsibilities of ENTITY

- 678 • Provide VOLUNTEER access to ENTITY’S Public Safety Answering Point staff.
- 679
- 680 • Provide VOLUNTEER with necessary information to conduct the Phone Pal training of
681 Public Safety Answering Point staff.
- 682
- 683 • Provide VOLUNTEER with necessary documents to record Phone Pal phone calls.
- 684
- 685 • Provide VOLUNTEER with self-addressed, stamped envelope for the purpose of
686 submitting the “Test Call Log” data to ENTITY.
- 687
- 688 • ENTITY will designate a Phone Pals Coordinator as the main contact for VOLUNTEER.
- 689
- 690 • ENTITY will meet with VOLUNTEER on a quarterly basis.

691 B. Responsibility of VOLUNTEER

692 VOLUNTEER shall receive no compensation, nor be entitled to any benefits, from ENTITY
693 for providing the services described below. VOLUNTEER shall personally perform their
694 obligations under this Agreement. It is understood and agreed that VOLUNTEER is an
695 independent contractor and that no relationship of employer-employee exists between the
696 parties hereto for any purpose whatsoever.

- 697 • VOLUNTEER will make a minimum of one (1) completed test call per shift per week for
698 the term of the Agreement.
- 699
- 700 • VOLUNTEER will make test calls according to the following procedures:
- 701
- 702 • VOLUNTEER will initiate a call on a TTY machine.
- 703
- 704 • ENTITY’S Public Safety Answering Point staff will answer the call and type “GA” in
705 response;
- 706
- 707 • VOLUNTEER will identify himself or herself by typing in his or her full name;
- 708
- 709 • VOLUNTEER will indicate that the call is a test by typing “THIS IS A TEST CALL”;
- 710
- 711 • If the Public Safety Answering Point staff cannot take the call at that time, they will type
712 “BUSY SK” and the call will be terminated.
- 713
- 714 • If the call is terminated with “BUSY SK” then VOLUNTEER will need to try again;

- 715 • If during a test call it must be terminated to respond to an emergency call, then the Public
716 Safety Answering Point staff will type “BUSY SK” and VOLUNTEER will need to call
717 back; and
- 718
- 719 • All information obtained by VOLUNTEER with regard to the test call shall be recorded
720 in the Test Call Log.
- 721
- 722 • A completed test call will be comprised of the following components:
- 723
- 724 • The call-taker recognizes that the caller was using a TTY.
- 725
- 726 • The call was transferred successfully to the Secondary PSAP (when appropriate).
- 727
- 728 • The conversation included at least 4 questions/statements between the call-taker and the
729 Phone Pal.
- 730
- 731 • The conversation lasted at least 45 seconds.
- 732
- 733 • VOLUNTEER will record all calls on the “Test Call Log” sheet and agrees that the “Test
734 Call Log” is ENTITY’S property and shall be treated as confidential information
735 pursuant to Article IV, Paragraph 8.
- 736
- 737 • VOLUNTEER shall mail, by the fifth of each month, the “Test Call Log” sheets to
738 ENTITY at the following address:
- 739
- 740 • VOLUNTEER’S concerns, complaints, problems, questions or other comments regarding
741 the training and or any aspect of the Phone Pals Program shall be immediately brought to
742 the attention of ENTITY’S Phone Pal Coordinator. The Phone Pal Coordinator may be
743 contacted at:

744 TTY: _____

745 VOICE/TTY: _____

746 VOICE: _____

747 IV. General Provisions

- 748 • VOLUNTEER Not Agent. Except as ENTITY may specify in writing, VOLUNTEER
749 shall have no authority, express or implied, to act on behalf of ENTITY in any capacity
750 whatsoever as an agent.
- 751
- 752 • Assignment and Subcontracting Prohibited. No party to this Agreement may assign or
753 transfer any right, or obligation or responsibility pursuant to this Agreement. Any attempt
754 or purported assigned of any right, obligation, or responsibility pursuant to this
755 Agreement shall be void and of no effect. VOLUNTEER shall not subcontract the

- 756 performance of any of VOLUNTEER'S obligations or responsibilities pursuant to this
757 Agreement.
758
- 759 • Term and Termination. The term of this Agreement shall be from _____, 20__ to
760 _____, 20__. The agreement may be extended with agreement of the parties.
761 VOLUNTEER shall be terminated if he/she does not make the required number of test
762 calls, fails to comply with the test call procedures outline above or violates any provision
763 of this Agreement. Either party may terminate this Agreement for its convenience upon
764 giving written notice, at the addresses stated below, to the other party. Upon termination
765 by either party or the natural expiration of the term, VOLUNTEER shall immediately
766 cease rendering Services pursuant to this Agreement and shall immediately deliver to
767 ENTITY all materials, Entity Information and any other property or information provided
768 to VOLUNTEER by ENTITY.
769
 - 770 • Entire Agreement. This document contains the entire agreement between the parties and
771 supersedes whatever oral or written understanding they may have had prior to the
772 execution of this Agreement. Any and all modifications or amendments to this Agreement
773 shall be in writing and executed by both parties.
774
 - 775 • Severability. If any portion of this Agreement or the application thereof to any person or
776 circumstance shall be held invalid or unenforceable, the remainder of this Agreement
777 shall not be affected thereby and shall be enforced to the greatest extent permitted by
778 law.
779
 - 780 • Waiver. Waiver by either party of any default, breach or condition precedent shall not be
781 construed as a waiver of any other default, breach or condition precedent or any other
782 right hereunder.
783
 - 784 • Enforcement of Agreement. This Agreement shall be governed, construed and enforced in
785 accordance with the laws of the State of _____. Litigation arising out of or
786 connected with this Agreement shall be instituted and maintained in the courts of
787 _____ County in the State of _____, and the parties consent to jurisdiction
788 over their persons and over the subject matter of any such litigation in such courts, and
789 consent to service of process issued by such courts.
790
 - 791 • Confidentiality of ENTITY Information. Volunteer agrees that he/she will not, either
792 during or after the term of this Agreement, make public or disclose to any third party any
793 information regarding the work, operations, or procedures of ENTITY or any other
794 agencies which comprise ENTITY'S Public Safety Answering Point. All such
795 information shall hereinafter collectively be referred to as "Entity Information". Entity
796 Information includes, but is not limited to, Test Call Logs; all notes used to compile Test
797 Call Logs or to document Public Safety Answering Point staff responses to Test Calls; all
798 evaluations of Test Calls; written procedures or policies of ENTITY; training or
799 operational practices and manuals of ENTITY; and all other information relating to the

800 work, operations, or procedures of ENTITY or any other agencies which comprise
801 ENTITY'S Public Safety Answering Point. VOLUNTEER acknowledges and agrees that
802 all Entity Information is a valuable, special and unique asset of ENTITY and that Entity
803 Information is strictly confidential. VOLUNTEER agrees that he/she will not at any time
804 duplicate the Test Call Log or any other Entity Information, or either directly or
805 indirectly, divulge, disclose or communicate orally or in writing any Entity Information to
806 any third party without the prior written consent of ENTITY. VOLUNTEER may comply
807 with an order issued by a court of competent jurisdiction to submit Entity Information for
808 the court's review or to release Entity Information to a third party. VOLUNTEER'S
809 unauthorized release of Entity Information shall be deemed a material violation of this
810 Agreement and will justify ENTITY'S entitlement to legal and/or equitable relief.
811

- 812 • Release. In consideration of being permitted to participate in ENTITY'S Phone Pal
813 Program, VOLUNTEER hereby agrees to release, waive, discharge and covenants not to
814 sue, under state or federal law, ENTITY for any loss, damage or injury to property of
815 VOLUNTEER, whether known, unknown or unanticipated at the time of this release or
816 in the future, due to the negligence and/or omissions of ENTITY, its officers, agents,
817 employees and volunteers which arise from, are in consequence of or are related to
818 VOLUNTEER'S participation in the Phone Pal program, whether suffered off of or while
819 on or about ENTITY premises and/or facilities or while using ENTITY'S equipment.
820 VOLUNTEER hereby expressly waives all rights or benefits, which they may not have or
821 in the future may have under the provisions of Section _____ of the State of _____.
822
- 823 • VOLUNTEER further expressly agrees that the foregoing release is intended to be as
824 broad and inclusive as is permitted by the laws of the State of _____.

825
826 VOLUNTEER has read/understands and voluntarily signs this Agreement.

827
828 Executed as of the day and year first stated above.

829 CITY OF _____	VOLUNTEER
830 BY: _____	_____
831 Signature	Signature
832 _____	_____
833 Title	Print Name
834 Address:	Address:
835 _____	_____

836
837

838 This agreement was communicated in the communication mode of volunteer's choice.

839 Document translation provided by: _____

840 _____
Signature

841 APPROVED AS TO FORM:

842 _____

843 Deputy City Attorney

844 ATTEST:

845 _____

846 City Clerk

847

DRAFT

848
849
850
851
852
853
854
855
856
857
858
859
860
861
862
863
864
865
866
867
868
869

Exhibit D

Testimonials

“We worked with both our hearing impaired community and our state agency. We set up a meeting and training session for an afternoon in our training room. The state agency brought along a simulator as well as several TTY’s for our stag to practice with. We sat down across from a member of the group and exchanged TTY messages and learned the proper way to answer, ask questions and other slang which they may use. After this training, we took all but the state representative into the 911 center; we then had the state representative place a 911 call on the TTY. Our staff handled the call just as if it was an actual call and the members were able to see 1) what we receive when the call comes in, 2) able to see what our 911 system is capable of, and 3) gain the confidence that our staff understands this system and will handle calls efficiently. We also have a stand-alone unit which we tested and demonstrated as well.”

“The meeting [with volunteers] went well and everyone learned something that day. We also left an open invitation to anyone who may move into the community and has questions to visit our center.”

“Our staff got extra training in TTYs and our hearing impaired community gained the confidence that both their emergency and non-emergency calls would be answered and handled as any other call.”