

## **Auxiliary Aids and Services Policy**

It is the policy of Progressive Casualty Insurance Company (Progressive) to take those steps required by law to ensure effective communication with individuals with disabilities by furnishing appropriate auxiliary aids and services. Progressive further shall take those steps required by law to ensure that no individual with a disability is excluded, denied services, segregated or otherwise treated differently than other individuals because of the absence of auxiliary aids or services, unless taking those steps would fundamentally alter the nature of Progressive's goods, services, facilities, privileges, advantages or accommodations, or would result in an undue burden, consistent with the requirements of Title III of the Americans with Disabilities Act (ADA), and its implementing regulations.

To meet this obligation, Progressive will provide, free of charge, appropriate auxiliary aids and services, whenever required, to ensure that individuals with disabilities have an equal opportunity to participate in, and benefit from Progressive's goods, services, facilities, privileges, advantages, or accommodations. This policy applies to all members of the public with disabilities contacting or attempting to contact Progressive's services, locations, and facilities.

### **1. What Are Appropriate Auxiliary Aids and Services?**

Appropriate auxiliary aids and services include a wide variety of equipment, materials, and services that may be required to ensure effective communication for people with disabilities and that do not fundamentally alter the nature of Progressive's goods, services, facilities, privileges, advantages or accommodations or result in an undue burden, consistent with the requirements of Title III of the Americans with Disabilities Act (ADA), and its implementing regulations.

**For example, for people who are blind or have low vision**, depending upon the circumstances, appropriate auxiliary aids and services may include qualified readers; printed information provided in Braille, in large print, in electronic format, or through audio recordings; oral descriptions of action and visual information to ensure the accessibility of proceedings and presentations; note takers; assistance in filling out forms or accessing materials in a computer database; providing digital content in a form that will properly interact with common accessibility software; or assistance to guide a person to find his or her way to an unfamiliar location or along an unfamiliar route; and other effective methods of making information or materials delivered using written word available to individuals who are blind or visually impaired.

**For people who are deaf, are hard of hearing, or have speech impairments**, appropriate auxiliary aids and services may include qualified oral/sign language interpreters (including on-site and video remote interpreting (VRI) services), written notes, video text displays, amplified and hearing aid compatible telephones, assistive listening systems, open or closed captioning and caption decoders, teletypewriters (TTYs), and other effective methods of making information or materials delivered using sound available to individuals who are deaf or hard of hearing.

### **2. What does the term "qualified interpreter" mean?**

The term "qualified interpreter" includes "sign language interpreters," "oral interpreters," or other "interpreters" who, via video remote interpreting (VRI) service or an on-site appearance, are able to interpret competently, accurately, and impartially, both receptively

and expressively, using any specialized terminology necessary for effective communication with an individual who is deaf or hard of hearing or who has a speech impairment, given that individual's language skills and education. Not all interpreters are qualified to interpret in all situations. For example, an interpreter who is qualified to interpret using American Sign Language (ASL) is not necessarily qualified to interpret orally. Also, someone who has only a rudimentary familiarity with sign language or finger spelling is not a "qualified sign language interpreter." Likewise, someone who is fluent in sign language but who does not possess the ability to interpret medical or legal terminology; process spoken communication into the proper signs; or observe someone signing and translate their signed or finger-spelled communication into spoken words is not a qualified sign language interpreter. An interpreter who knows tactile interpreting may be the only interpreter who is qualified to interpret for someone who is both deaf and blind. Although an interpreter may be certified, a certified interpreter is not necessarily "qualified." Similarly, certification is not required in order for an interpreter to be "qualified."

### **3. What is a "qualified reader" and when might a qualified reader be required?**

A "qualified reader" is a person who is able to read effectively, accurately, and impartially using any necessary specialized vocabulary. For example, a qualified reader may assist a person who is blind or has low vision in reading and filling out forms. When assisting a person in reading documents or completing forms that involve confidential personal, medical, or financial information, the assistance must be provided in a private area in order to preserve the privacy of the individual who is being assisted.

### **4. What does the term "video remote interpreting service" mean?**

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

- (a) Real-time, full-motion video and audio over a dedicated high-speed, wide-bandwidth video connection or wireless connection that delivers high-quality video images that do not produce lags, choppy, blurry or grainy images, or irregular pauses in communication;
- (b) A sharply delineated image that is large enough to display the interpreter's face, arms, hands, and fingers, and the participating individual's face, arms, hands and fingers, regardless of his or her body position;
- (c) A clear, audible transmission of voices; and
- (d) Adequate training to users of the technology and other involved individuals so that they may quickly and efficiently set up and operate the VRI.

### **5. Can Progressive employees or contractors ask or require family members or friends of individuals who are blind or have low vision to read for them?**

No. Progressive may not ask or require friends or family members to interpret, read, fill out forms, or provide other auxiliary aids or services for individuals with disabilities. A family member or friend may not be qualified to render the necessary services due to factors such as professional or personal involvement or invasion of an individual's right to

keep personal, medical, or financial information confidential from friends and family members.

**6. Can Progressive charge an individual with a disability for the cost of providing an auxiliary aid or service needed for effective communication?**

No. People with disabilities must not be asked to pay or be charged for the cost of an auxiliary aid or service needed for effective communication.

**7. Are there specific procedures for requesting auxiliary aids and services?**

Whenever possible, requests for auxiliary aids and services should be directed to <https://www.progressive.com/web-site-accessibility/>. Requests can be made by an individual with a disability who needs the auxiliary aids or services or by someone acting on that individual's behalf. When <https://www.progressive.com/web-site-accessibility/> is not available to receive a request, the request may be directed to [accessibility@progressive.com](mailto:accessibility@progressive.com), or 833.938.1702.

Requests can be made either in writing or orally. Requests should be made in advance, whenever possible, in order to better enable Progressive to address the communication needs of the individual. However, Progressive will address all requests for auxiliary aids and services promptly and in accordance with ADA requirements.

**8. How will Progressive determine which auxiliary aids and services to provide?**

The type of auxiliary aid or service necessary to ensure effective communication will vary in accordance with the method of communication used by the individual; the nature, length, and complexity of the communication involved; and the context in which the communication is taking place. Progressive will consult with individuals with disabilities whenever possible to determine what type of auxiliary aid is needed to ensure effective communication, but the ultimate decision as to what measures to take rests with Progressive, provided that the method chosen results in effective communication. In order to be effective, auxiliary aids and services must be provided in accessible formats, in a timely manner, and in such a way as to protect the privacy and independence of the individual with a disability.

**9. How will Progressive handle requests for auxiliary aids and services?**

Upon receipt of notification that any auxiliary aids and services will be necessary, Progressive's personnel will confer with the individual with the disability to ascertain the individual's needs. Progressive will respond promptly to all requests for auxiliary aids and services to ensure that individuals with disabilities have a full and equal opportunity to participate in and benefit from the goods, services, facilities, privileges, advantages, or accommodations offered by Progressive. Progressive will neither request nor require documentation of disability.

Progressive will not disclose information about an individual's disability or requests for auxiliary aids and services except to Progressive personnel who have a need to know this information (e.g., to make a decision on a request and/or to provide the auxiliary aids and services).

**10. What should Progressive personnel do if they believe that provision of requested auxiliary aids and services will result in a fundamental alteration or**

## **impose undue financial and administrative burdens on Progressive?**

If provision of a particular auxiliary aid or service by Progressive would result in a fundamental alteration in the nature of the goods, services, facilities, privileges, advantages, or accommodations being offered or in an undue burden, i.e., significant difficulty or expense, Progressive shall provide an alternative auxiliary aid or service, if one exists, that would not result in an alteration or such burden but would nevertheless ensure that, to the maximum extent possible, individuals with disabilities receive the goods, services, facilities, privileges, advantages, or accommodations offered by Progressive.

All decisions denying a requested auxiliary aid or service on the grounds that doing so would result in a fundamental alteration or impose undue burdens must be made by our Accessibility Service Manager, after considering all resources available to Progressive, and must be accompanied by a written statement of the reasons for reaching that conclusion.

Any questions about this policy should be directed to our Accessibility Service Manager at [accessibility@progressive.com](mailto:accessibility@progressive.com).