

Auxiliary Aids Plan 2020



Policy:

Identification and assessment of need:

The Spring of Tampa Bay, Inc. will take appropriate steps to ensure that persons with disabilities, including persons who are deaf, hard of hearing, or blind, or who have other disabilities such as in speech or physical, have an equal opportunity to participate in our services, activities, programs and other benefits. The procedures outlined below are intended to ensure effective communication with participants involving their services. The procedures also apply to, among other types of communication, communication of information contained in important documents, including waivers of rights, consent for services forms, financial and insurance benefits forms, etc. All necessary auxiliary aids and services shall be provided without cost to the person being served.

All staff will be provided written notice of this policy and procedure, and all staff will be trained in effective communication techniques, including the effective use of interpreters.

The Spring of Tampa Bay, Inc. shall comply with Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. 794, as implemented by 45 C.F.R. Part 84 (Hereinafter referred to as Section 504) and the Americans with Disabilities Act of 1990, 42 U.S.C. 12131, as implemented by 28 C.F.R. Part 35 (hereinafter referred to as ADA).

This plan is available in alternative formats at the request of staff and participants. This plan will be disseminated to persons and agencies working with people living with a disability and Limited English Proficient and will be posted on The Spring's website.

Single Point of Contact

The Single Point of Contact Rosa Contreras, will ensure effective communication with Deaf or Hard-of-Hearing customers or companions in accordance with Section **504** and the ADA. The Single Point of Contact shall ensure that employees are aware of the requirements, roles, responsibilities, and contact points associated with compliance with Section 504 and the ADA.

Provision of Auxiliary Aids and Services

The Spring of Tampa Bay will at all times recognize that the customer or companion's preference is the primary consideration in determining what auxiliary aids or services to provide. If communication through a specific auxiliary aid or service is deemed to be ineffective, staff will ask the customer or companion to determine a more effective auxiliary aid or service for communication. Documentation shall be made in the customer's file regarding the attempt to improve the effectiveness of auxiliary aids and services.

If a participant or companion is Deaf or hard of hearing, The Center's staff shall obtain auxiliary aids according to the communication assessment and requested services. All interpreters' certifications shall be verified.

Some persons who are deaf or hard of hearing may prefer to request to use family members or friends as an interpreter. However, family members or friends of the person will not be used as interpreters unless specifically requested by that individual and after an offer of an interpreter at no charge to the person has been made by the facility. Such an offer and the response will be documented in the person's file. A certified interpreter will be provided regardless to ensure the communication is effective at all interactions deemed an aid essential communication.

Children and other participants will NOT be used to interpret, in order to ensure confidentiality of information and accurate communication.

Staff that is unfamiliar with the auxiliary aid or service requested shall contact their Single Point of Contact (SPOC), 504/ADA Coordinator (Civil Rights Officer) or their Supervisor, for assistance in locating appropriate resources to ensure effective communication with clients, customers and companions.

Provision of Interpreters in a Timely Manner

The Spring of Tampa Bay staff shall provide interpreters for customers and companions who are Deaf or hard-of-

hearing in a timely manner in accordance to the following standards:

1. **Non-Scheduled Interpreter Requests:** For any emergency situation that is not a scheduled appointment, staff shall make an interpreter available as soon as possible, but in no case later than two (2) hours from the time the customer or companion or staff requests an interpreter, whichever is earlier. If the situation is not an emergency, staff shall offer to schedule an appointment (and provide an interpreter where necessary for effective communication) as convenient to the customer or companion, but at least by the next business day.
2. **Scheduled Interpreter Requests:** For scheduled events, staff shall make a certified interpreter available at the time of the scheduled appointment. If an interpreter fails to appear for the scheduled appointment, staff shall take whatever additional actions are necessary to make an interpreter available to the customer or companion who is deaf or hard-of-hearing as soon as possible, but in no case later than two (2) hours after the scheduled appointment.

Auxiliary Aids Documentation

The Spring of Tampa Bay shall document the customer or companion's preferred method of communication and any requested auxiliary aids and services provided in the customer's program file. Documents and forms evidencing when and how The Center provided auxiliary aids and services to customers or companions shall be retained within the customer's corresponding file for ten years. Forms include but are not limited:

- Customer or Companion Assessment and Assessment and Auxiliary Aid and Service Record
- Customer or Companion Request for Free Communication Assistance or Waiver
- Customer or Companion Feedback form (to be mailed out by customer or if requested, by center)
- Auxiliary Aid Service Record Monthly Summary Report

This documentation will continue to be kept for record keeping with the SPOC.

Denied Auxiliary Requests

Documentation, with supporting justification, must also be made if any request was not honored. The Center's Executive Director is the only person that can deny auxiliary aid requests made by a customer or companion. If a staff person is not familiar with an auxiliary aid request, please contact the SPOC for information as well as ask the survivor for any information that you may need to secure this aid, but reiterate that the cost of any auxiliary aid is the responsibility of the agency and not the participant.

Referrals

If customers or companions are referred to other agencies, the provider must ensure that the receiving agency is notified of the customer or companion's preferred method of communication and any auxiliary aid or service needs. In order to accommodate this, the center will ensure that the referral is desired by the participant and that they sign a Release of Information Form.

Customer Feedback Form

The provider shall distribute Customer /Companion Feedback Forms to customers or companions that are Deaf or hard of hearing and provide assistance in completing the forms if requested by the customer or companion. The original Customer/Companion Feedback Form shall be mailed to DCF, Office of Civil Rights, 1317 Winewood Boulevard, Building 1, Room 110, Tallahassee, FL 32399-0700 by the participant or if requested, by The Center. A copy of the Customer Feedback Form **shall not be kept in the file.**

Documentation/Record Retention

Records relating to auxiliary aids and services provided shall be retained by each local office and the original document retained in the client or customer's file or records. All final requests for accommodations, along with relevant documentation, will be forwarded to the designated 504/ADA Coordinator.

Signage

The Single-Point-of-Contact will ensure that conspicuous notices which provide information about the availability of appropriate auxiliary aids and services at no-cost to the deaf or hard-of-hearing customers or companions are posted near where people enter or are admitted within the center locations. The SPOCs name and contact information should be on the Deaf and Hard of Hearing Poster as well as the name and contact information for the ADA 504 Coordinator.

The approved Notices can be downloaded through the Internet at: <http://www.dcf.state.fl.us>

HHS Reports

The Center shall submit HHS Reports monthly, no later than the 5th day of each month, to the FCADV Contract Manager.

Event Accommodations

The Center shall ensure accessibility to meetings, conferences and seminars to persons with disabilities, limited English proficiency, and Deaf or hard of hearing by placing the following statement on all event notices and advertisements prior to the event:

The Center will provide accommodations, including certified sign language interpreters, assistive listening devices, alternative formats of printed materials and real-time captioning upon request for persons who are deaf, hard of hearing or are living with disabilities. To ensure accommodations, please make your request within 7 days prior to the event to Rosa Contreras at rcontreras@thespring.org or Roseanne Cupoli at rocupoli@thespring.org.

Staff Training

The staff shall receive training on how to provide auxiliary aids and services for persons with disabilities and limited English proficiency (LEP) within 60 days of commencing employment. The Center's staff shall receive an annual refresher training on auxiliary aids and services for persons with disabilities and limited English proficiency (LEP). The Center's staff shall be trained to use the TTY phone and video relay call. Training documentation shall be maintained in each employee's training file.

Auxiliary Aid Resources Florida Video Relay- 7-1-1

Through the Florida Relay Service, people who use specialized telephone equipment can communicate with people who use standard telephone equipment. To call Florida Relay, dial **7-1-1**, or use the appropriate toll free numbers below:

1-800-955-8771 (TTY)

1-800-955-8770 (Voice)

1-877-955-8773 (Spanish)

1-877-955-8707 (French Creole)

Video Remote Interpreting

Through a video remote interpreter people can use an interpreter via technology to communicate with a participant instead of an in person interpreter. This is a good resource for emergency situations with limited time to get an in person

interpreter as well as if there are few local community resources for certified interpreters. Below is the phone number for the Registry of Interpreters for the Deaf which will provide contact information for certified video remote interpreting.

Registry of Interpreters for the Deaf: (703) 838-0030 (Video Remote Interpreters)

CART-Captioning Real Time and Providers

Captioning (Real Time). This is the simultaneous conversion of spoken words to text, through computer-assisted transcription or court reporting, and displaying that text on a video screen. This communication service is beneficial to individuals who are deaf or hard-of-hearing that do not use sign language or for whom assistive listening devices and systems are ineffective.

<p>Kaptions4U, LLC Brandi Kent, RPR, CBC, CRR, CCP 352-516-8310</p>	<p>Tanya Ward English, CRR-CCP-CBC tanya@floridarealtime.com CAPTION CREW Florida Realtime Reporting 954.767.6363</p>
<p>Marianne E. Sayers, RPR, CRR Fort Myers Court Reporting 2231 First Street Fort Myers, FL 33901 941-334-1411 941-334-1476 fax</p>	<p>Registry of Interpreters for the Deaf: (703) 838-0030</p>

Certified Sign Language Interpreters:

Florida Registry of Interpreters for the Deaf
 (703) 838-0030

www.fridcentral.org

REQUEST ONLY CERTIFIED SIGN LANGUAGE INTERPRETERS

Purple
 Main: 1-866-669-7707
 After hours: 800-549-6000

Jessica Harris Interpreting Services
 Online requests: Jhinterpretingservices.com
 Main: 727-271-0160

Viscom
 Main: 941-363-1318

For Limited English Speaking Survivors:

Please use the following service: Telelanguage Line

Before Calling:

1. Know the language that is needed
2. Be prepared to brief the interpreter about the nature of the call before they speak to the Limited English Speaker (LES). "I am calling from a domestic violence center".
3. If you have the non-English speaker on the phone call Telelanguage Line and connect a 3 way call
4. For outbound calls, provide the operator with a dial out number and they will make a 3 way conference call

How to Make a Call to Telelanguage Line:

Dial 888-540-5543, you will be asked:

- What language you need
- Where you are calling from
- What is your first and last name
- What is the code number for your agency (Please refer to your center for the code)

During the Call:

- Speak in short phrases or sentences
- Avoid slang, jargon, and technical terms
- Check for understanding from the Limited English Speaker (LES) throughout the call. If needed, rephrase the questions or statements until understood
- When speaking to the interpreter, do not give and/or ask too much information at one time.
- Ask questions in the first person
- Make sure to pause to allow the interpreter time to translate and the LES time to respond

Ending the Call:

Be sure the Limited English Speaker and interpreter know that the call is ending.

For Persons Who are Blind or who have Low Vision

- Staff will communicate information contained in written materials concerning treatment, benefits, services, waivers or rights, and consent to treatment forms by reading out loud and explaining these forms to persons who are blind or who have low vision.
- All staff are responsible for providing the aids and services in a timely manner. In the event staff need further assistance in providing accommodations they may contact the agency's SPOC for assistance. The SPOC may assist in obtaining resources such as certified readers; reformatting into large print; taping or recording of print materials not available in alternate format; or other effective methods that help make visually delivered materials available to individuals who are blind or who have low vision. In addition, staff are available to assist persons who are blind or who have low vision in filling out forms and in otherwise providing information in a written format.

For Persons with a specific disability in Speech.

To ensure effective communication with persons with speech impairment, staff will contact Rosa Contreras and other communication aids.

For Persons with a physical disability in their hands.

Staff will assist those who have difficulty in manipulating print materials by holding the materials and turning pages as needed, or by providing one or more of the following:

- Note takers, computer aided transcription services, speaker phones or other effective methods that help ensure effective communication. For assistance with these and other aids and services, staff will contact the agency’s SPOC.

Customer Complaints

If you believe you were wrongfully denied access to services or discriminated against:

1. Inform the person who denied access to services that you believe they wrongfully denied you services and why you believe that is the case.
2. Ask to speak to a manager, immediately.
3. You may submit your complaint/grievance in writing or verbally.
4. Direct your concern to Rosa Contreras, Director of Outreach Services (SPOC) or Roseanne Cupoli, Chief Program Officer.
 - a. What service were you denied?
 - b. What were you told was the reason you were denied service?
 - c. What person denied you services?
 - d. What was the date you were denied service?

In addition to the above actions, discrimination complaints may also be filed externally with the state and federal government.

<p>Assistant Staff Director for Civil Rights 1317 Winewood Boulevard Building 1, Room 110 Tallahassee, FL 32399-0700 850-487-1901</p>	<p>Executive Director Florida Commission on Human Relations 2009 Apalachee Parkway, Suite 100 Tallahassee, FL 32301-4857 850-488-7082</p>
<p>US Department of Health & Human Services Office for Civil Rights Atlanta Federal Center, Suite 3B70 61 Forsyth Street, SW Atlanta, GA 30303-8909 404-562-7881</p>	<p>US Department of Justice Coordination & Review Section Civil Rights Division P.O. Box 66118 Washington, DC 20035-6118 202-514-0301</p>