



CONNECTING YOU TO HOPE & HELP

Auxiliary Aids Plan

Policy:

Identification and assessment of need:

First Contact 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. These procedures also apply to, among other types of communication and communication of information contained in important documents. 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.

First Contact 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 First Contact's website.

Single Point of Contact (SPOC)

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

SPOC: Micki Thompson, President/CEO 727-403-4062 or mickit@211tampabay.org

Provision of Auxiliary Aids and Services

First Contact 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, First Contact staff shall obtain auxiliary aids according to the communication assessment and requested services. All interpreters' certifications shall be verified. First Contact contracts with a 3rd party vendor (Language Line) to provide certified on-demand interpreters.

Some people 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 SPOC 504/ADA Coordinator 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

First Contact staff shall provide interpreters for customers and companions who are Deaf or hard-of-hearing in a timely manner in accordance with the following standards:

- ***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.
- ***Scheduled Interpreter Requests:*** For scheduled events, staff shall make certified interpreters available at the time of the scheduled appointment. If an interpreter fails to appear for the scheduled appointment, staff shall take whatever actions 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

First Contact 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 First Contact provided auxiliary aids and services to customers or companion's shall be retained within the customer's corresponding file for 7 years. Forms include but are not limited to:

- 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 from (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. First Contact's President/CEO 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 customer 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, First Contact 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, First Contact will ensure that the referral is desired by the participant and that they have verbally provided verification that their information can be released to that provider.

Customer Feedback Form

First Contact 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, Room110, Tallahassee, FL 32399-0700 by the participant or if requested, First Contact. 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 the organization and the 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 SPOC 504/ADA Coordinator.

Signage

The SPOC 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 to First Contact facilities and/or program 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>

Reports

First Contact shall complete and submit a monthly report for the Deaf and Hard-of-Hearing monthly, no later than the 5th day of each month. The following activities need to be completed by the 5th day of each month:

- On the DCF website at
https://fs16.formsite.com/DCFTraining/Monthly-Summary-Report/form_login.html
- Upload the completed and submitted report to Exhibit A on the CFBHN sharepoint site.
- Email a copy of the submitted report to the DCF Contract Manager Patricia Overway (Patricia.Overway@myflfamilies.com)

Event Accommodations

First Contact 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:

First Contact will provide accommodations 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 admin@firstcontact.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. First Contacts' staff shall receive an annual refresher training on auxiliary aids and services for persons with disabilities and limited English proficiency (LEP). First Contacts 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. This service is available 24/7 for those who are deaf, hard-of-hearing, Deaf/Blind, and Speech Disabled..

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)

Communication Access Realtime Translation (CART)

Communication Access Realtime Translation (CART) is the simultaneous conversation 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 for individuals who are deaf or hard-of-hearing that do not use sign language or for whom assistive listening devices and systems are ineffective.

IKaption4U
ikaption4u.com

Caption Crew
Captioncrew.com

Registry of Interpreters for the Deaf:
rid.org
571-384-5163

National Court Reporters Association - CART Provider Directory
[.ncra.org](http://ncra.org)
800-272-6272

Certified Sign Language Interpreters:

Florida Registry of Interpreters for the Deaf
www.fridcentral.org

For Limited English Speaking Individuals:

Please use the following service: Language 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).
3. If you have the non-English speaker on the phone call Language 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 Language Line:

Dial the Language Line Number, 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 our agency.

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. 5

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 Director, immediately.
3. You may submit your complaint/grievance in writing to admin@firstcontact.org
 - What service were you denied?
 - What were you told was the reason you were denied service?
 - What person denied you services?
 - 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.

Florida Department of Children and Families

Office of Civil Rights

2415 North Monroe Street, Suite 400

Tallahassee, FL 32303

Voice: 850-487-1901

TDD/TTY: 850-922-9220

Fax: 850-921-8470

<https://www.myflfamilies.com/about/additional-services-offices/office-civil-rights>

Florida Commission on Human Relations

4075 Esplanade Way Unit 110

Tallahassee, FL. 32399

Voice: 850-488-7082

<https://fchr.myflorida.com/>

US Department of Health & Human Services, Office for Civil Rights

Atlanta Federal Center, Suite 3B70

61 Forsyth Street, SW

Atlanta, GA 30303-8909

Voice: 404-562--7888

TDD/TTY: (404) 331-2867

Fax: (404) 562-7881

<https://www.hhs.gov/ocr/index.html>

US Department of Justice

Civil Rights Division

Office of the Assistant Attorney General

950 Pennsylvania Avenue NW

Office of the Assistant Attorney General, Main

Washington, DC 20531

Voice: 202-514-4609

TDD/TTY: 202-514-0711

Fax: (202) 307-2839

<https://www.justice.gov/crt>