

Auxiliary Aids Plan NWF Health Network

The Americans with Disabilities Act of 1990 (ADA), Americans with Disabilities Act Amendments Act of 2008 (ADAAA) and Title VI of the Civil Rights Act of 1964 (as amended), requires recipients receiving federal financial assistance to develop procedures, policies and protocols to provide auxiliary aids for persons with disabilities and Limited English Proficiency.

This plan provides protocol for the implementation of NWF Health Network (NWFHN) policies and procedures for provision of auxiliary aids and services in ensuring accessibility to all programs, benefits and services to persons with disabilities and foreign language interpreters for persons with Limited English Proficiency.

This plan may be 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. This plan will be posted on the NWFHN website.

Non-Discrimination Policy

No person shall, on the basis of race, color, religion, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of, or be subjected to unlawful discrimination under any program or activity receiving or benefiting from federal financial assistance and administered by the Department.

Single Point of Contact

NWFHN's Single Point of Contact, whose contract information is included below, will ensure:

- Effective communication with Deaf or Hard-of-Hearing clients or companions in accordance with Section 504 and the ADA.
- Capture the information required in the Auxiliary Aid Service Record within each customer's case record.
- Summarize the records into a report and submit to the appropriate DCF 504/ADA Coordinator
- That information is provided to any agency to which a customer or companion who is Deaf and Hard of Hearing is referred, about the person's requested auxiliary aid service.
- That employees are aware of the requirements, roles, responsibilities, and contact points associated with compliance with Section 504 and the ADA.

Training

Training is essential to the on-going success of providing auxiliary aids and services to persons with disabilities or those who are Limited English Proficient.

New employee orientation will include training on CFOP 60-10 Chapters 1, 3 and 4, Title II of the Americans with Disabilities Act of 1990, CFOP 60-16, Methods of Administration, and Section 504 of Rehabilitation Act of 1973.

All staff will receive training, annually, on how to provide assistance to persons with disabilities and persons who are Limited English Proficient.

Provision of Auxiliary Aids and Services

NWFHN will at all times recognize that the client 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 ineffective, staff will ask the client or companion to determine a more effective auxiliary aid or service for communication. NWFHN will assure that the responsible party/agency is aware that documentation shall be placed in the client'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 agency's staff shall obtain auxiliary aids according to the communication assessment and request for services. All ASL interpreters'

Auxiliary Aids Plan NWF Health Network

certifications shall be verified. Staff that is unfamiliar with the auxiliary aid or service requested shall contact their Single Point of Contact (SPOC) or their Supervisor, for assistance in locating appropriate resources to ensure effective communication with clients, parents and companions.

Provision of Interpreters in a Timely Manner

NWFHN will assure that agency staff provides interpreters for clients 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 client 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 client or companion, but at least by the next business day.
2. Scheduled Interpreter Requests: For scheduled events, staff shall make a qualified 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 a qualified interpreter available to the client 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

NWFHN shall ensure that the responsible party or agency document the client or companion's preferred method of communication and any requested auxiliary aids and services provided in the client's program file. Documents and forms evidencing when and how the agency provided auxiliary aids and services to clients or companions shall be retained within the client's corresponding file for seven years.

Forms include but are not limited:

- Client or Companion Assessment and Assessment and Auxiliary Aid and Service Record
- Client or Companion Request for Free Communication Assistance or Waiver
- Client or Companion Feedback form
- Auxiliary Aid Service Record Monthly Summary Report

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

All forms are available on the DCF website at <http://www.myflfamilies.com/about-us/services-deaf-and-hard-hearing/forms-publications>

Denied Auxiliary Requests

Documentation, with supporting justification, must also be made if any request was not honored. NWFHN's Operation Managers or the COO is the only people at NWFHN that can deny auxiliary aid requests made by a client or companion. Staff members who are unfamiliar with an auxiliary aid request are to contact the SPOC for information. Staff will gather any information that might help secure this aid from the requesting client, but will reiterate that the cost of any auxiliary aid is the responsibility of the agency and not the participant.

Referrals

If clients or companions are referred to other agencies, NWFHN will ensure that the receiving agency is notified of the client's preferred method of communication and any auxiliary aid or service needs. In order to accommodate this, the responsible party or agency will ensure that the referral is desired by the participant and that he or she signs a Release of Information Form.

Client Feedback Form

Auxiliary Aids Plan NWF Health Network

NWFHN shall ensure that the responsible party or agency distributes the Client or Companion Feedback Forms to clients or companions that are Deaf or Hard of Hearing and provide assistance in completing the forms if requested. Documentation of the distribution shall be maintained in the client's file. The original Feedback Form shall be mailed to DCF, Office of Civil Rights, 2415 North Monroe Street, Suite 400, Tallahassee, Florida 32303-4190 by the client or if requested, by the agency. A copy of the Feedback Form shall not be kept in the file.

Documentation/Record Retention

NWFHN shall verify that records relating to auxiliary aids and services provided are retained by each provider agency and the original document retained in the client's file or record. All final requests for accommodations, along with relevant documentation, will be forwarded to the designated 504/ADA Coordinator.

Signage

The NWFHN SPOC and Operation Managers will ensure that conspicuous notices are posted near the entrances of NWFHN service centers indicating the availability of auxiliary aids and services for deaf or hard-of-hearing clients, parents or companions.

HHS Reports

NWFHN shall collect and submit provider agencies' HHS Reports monthly, no later than the 5th day of each month, to its DCF Contract Manager.

Event Accommodations

NWFHN shall ensure accessibility to public 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:

NWFHN will provide accommodations, including American 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 at least 7 days prior to the event to Brandi Griffiss at Brandi.Griffiss@NWFHealth.org and Connie Lyda at Connie.Lyda@NWFHealth.org.

Auxiliary Aid Resources / Accessibility & Accommodations for Special Populations

For questions regarding the below listed resources, or for questions and assistance obtaining any services listed below, go to:

<http://www.ftri.org/>

or contact NWFHN's Single Point of Contact
Brandi Griffiss at Brandi.Griffiss@NWFHealth.org
and
Connie Lyda at Connie.Lyda@NWFHealth.org.

Assistive Listening Devices

Assistive Listening Devices (example: phone amplifier) are available at the Leon Human Services Center or through the Partnering Agencies.

Florida Video Relay 7-1-1

Auxiliary Aids Plan NWF Health Network

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)
- 1-800-955-3771 (ASCII)
- 1-877-955-8260 (VCO-Direct)
- 1-800-955-5334 (STS)
- 1-877-955-8773 (Spanish)
- 1-877-955-8707 (French Cr)

Video Remote / Video Relay Interpreting

A video telecommunication service that uses devices such as web cameras or videophones to provide sign language or spoken language interpreting services. This is done through a remote or offsite interpreter, in order to communicate with persons with whom there is a communication barrier. It is similar to a slightly different technology called video relay service, where the parties are each located in different places. Contact Language People at www.languagepeople.com or (707) 538-8900 for additional information.

Directory of Services

[DCFStatewideAuxiliaryAidsandServicesPlan.pdf](#)

Look on the left side of the internet page under quick links for the small banner “Service Delivery for the Deaf and Hard of Hearing.” Click on that banner and look again on the left side bar for numerous resources that will assist you when serving our customers and companions who are deaf or hard-of-hearing. The instructional guides and job aids for operating the assistive listening devices are located under “Assistive Listening Device (ALD) Pilot Central Region.” You’ll also find the Process Map for Accessing ALD equipment on that page.

For Limited English-Speaking Clients

Language Line, Inc. provides interpreter services to clients with Limited English Proficiency (LEP) as mandated by federal and state civil rights regulations. There is a fee for services provided through Language Line, Inc. Each program will be charged for their use of the telephone interpreter services. Telephone interpreter services can be accessed 24 hours a day by following these instructions (unless alternative contracts are in place) when placing a call to a non-English speaker, begin at step 2:

When receiving a call:

1. Place the non-English speaker on hold.
2. Dial: 866-874-3972
3. This is an automated answering system. Please have your 6-digit client ID available as well as the language needed, and your name.
4. Once an interpreter has been added to your call, provide your

Auxiliary Aids Plan NWF Health Network

information in three to four sentences in a logical order so the interpreter can retain the information and interpret it accurately to your LEP client.

5. Please inform the interpreter if you are using a handheld phone, versus a speakerphone, so they will allow time for the phone to be passed back and forth, before relaying the information.

Note: To access the Language Line Tutorial: <http://www.languageline.com/training>.

If you are not a language line Customer, you can contact them at:

- Call them at 1-800-752-6096 option 4
- 1-831-648-7548 (International)
- See their Frequently Asked Questions
- Open an Account

Client 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. Direct your concern to Mike Watkins, Chief Executive Officer and include the following information:
 - 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.

Office of Civil Rights

2415 North Monroe Street
Suite 400
Tallahassee, FL 32303-4190
850-487-1901

Executive Director Florida Commission on Human Relations

2009 Apalachee Parkway, Suite 100
Tallahassee, FL 32301-4857
850-488-7082
1 (800) 342-8170 TDD

US Department of Health & Human Services Office for Civil Rights

200 Independence Avenue, SW
Room 509F, HHH Building
Washington, D.C. 20201
1 (800)368-1019
TDD: 1 (800) 537-7697

**Auxiliary Aids Plan
NWF Health Network**

US Department of Justice, Coordination & Review Section, Civil Rights Division

950 Pennsylvania Avenue NW

Washington, DC 20530

202-514-3847

TTY/TDD: 711