



Series: 1200 Human Resources

Policy Name: Auxiliary Aid Plan

Policy Number: 1224

Origination Date: 11/01/2013

Revision Date: July 1, 2018

Regulation: Section 504, Title V, Rehabilitation Act of 1973, as amended, (45 Code of Federal Regulations, Part 80); Title VI of the Civil Rights Act of 1964; Americans with Disabilities Act of 1990; U.S. Agency of Health and Human Services, Office of Civil Rights Guidance Memorandum, dated January 29, 1998, Title VI Prohibition Against National Origin Discrimination – Persons with Limited-English Proficiency.

Policy: Communities Connected for Kids and its contracted providers of client services will provide to all persons with impaired sensory, manual or speaking skills, and those persons with limited proficiency in the English language, appropriate assistance that are necessary to afford such persons equal opportunity to access and benefit from the services and programs administered by the agency.

This plan provides Communities Connected for Kids with guidelines as follows:

- a. All clients for services with impaired sensory, manual or speaking skills, have equal opportunity to use and benefit from the programs and services administered by the agency.
- b. Qualified persons, due to their limited ability to speak, read, write, or otherwise understand English language, are not excluded from or denied equal access to the services and programs administered by the agency.
- c. Reasonable accommodation(s), as needed, are made available to the above clients to ensure that they are not denied full participation in the programs and services of the agency.

Scope: The policies and procedures described in this plan apply to all Communities Connected for Kids offices and also providers who provide direct services at our service centers to clients or potential clients with impaired sensory (hearing and vision), manual or speaking skills, and those with limited proficiency in English.



Auxiliary Aids for clients with sensory impairment may include:

- Amplified Telephones and other Assistive Listening Devices and Systems
- TDD/TTY – Text telephone used like a typewriter that can be used by people who are deaf, hard of hearing or speech impaired
- Florida Relay Service (FRS) – A service offered to all persons in the state which enables a hearing person to communicate with a person who is hearing or speech impaired through a specially trained operator called a communications assistant
- Braille, Large Print, Audio-Tapes and Computer Disks
- Qualified/Certified sign interpreters, Note takers, and Readers

Assistance for persons with limited proficiency in English may include:

- Hiring bilingual staff
 - Hiring staff interpreters
 - Using volunteer staff interpreters
 - Arranging volunteer community interpreters
 - Contracting outside interpreter-services
 - Telephone interpreter services such as the AT&T Language Line
- a. All qualified clients and/or potential clients are entitled to equal opportunity to use and benefit from the programs and services of the agency. This includes reasonable accommodations to ensure that programs and services of the agency are equally accessible to and equally effective for otherwise qualified persons who have hearing, vision or mobility impairments, or who are limited in their ability to speak, write, read or otherwise understand English.
- b. Auxiliary Aids will be available for use by clients, potential clients, and employees with impaired sensory, manual or speaking skills, or limited English proficiency in each phase of the service delivery or employment process when the lack of such aids may in effect deny or delay service accessibility, hinder service effectiveness or deny persons with disabilities reasonable accommodations to ensure nondiscrimination and equal opportunity.

Procedure: The following procedures are to be followed by agency and network providers of direct client services in providing auxiliary aids.



- a. Client needs are assessed through consulting with the client/potential client concerning his/her preferred communication mode, and if applicable, with the assigned caseworker, counselor, parent or other family member, guardian or other representative and the auxiliary aids/hearing impaired coordinator. (NOTE: Hearing impaired clients or those clients with limited proficiency in English language have a right to a qualified interpreter. The use of family or friends as interpreters is highly discouraged except in an emergency, as it could result in a breach of confidentiality or reluctance on the part of beneficiaries to reveal personal information critical to their situations to family and friends.)
- b. It is the responsibility of all supervisors/directors for each program to ensure that appropriate auxiliary aids are provided for the client. When obtaining auxiliary aids, every effort should be made to utilize the agency's current resources. However, if auxiliary aids need to be obtained from outside the agency, the supervisor/director shall contact Communities Connected for Kids Single Point of Contact (SPOC) for assistance.
- c. Certain auxiliary aids are not always readily available, particularly in rural areas. This problem is compounded when advance notice cannot be anticipated which is often the case for child protective services cases, and walk-ins. To help alleviate this problem, each major service center will have staff available to provide assistance. The staff are either reasonably skilled in basic sign language and finger spelling or are knowledgeable of the existing resources available in the Circuit, including certified interpreters from the Deaf Service Centers. Auxiliary aids shall be provided in a time frame that will not unreasonably delay, impede or deny services to clients. This will also include other languages.
- d. During the initial need assessment, clients must be informed of the available auxiliary aids, and that the agency will provide these services at no cost to them. The clients' wishes and needs for auxiliary aids should be taken into consideration before deciding on the appropriate auxiliary aids.
- e. Posters containing information about the availability of auxiliary aids are in all service -center locations within the Circuit.
- f. When meetings, conferences, or seminars are scheduled, information will be included in the advertisement, conference registration materials or meeting notices that participants with mobility or sensory impairments will be provided with necessary auxiliary aids at no cost to themselves. The information will include the name of a contact person and a date by which the participant must request such assistance. The registration process should include a method for determining the number and type of participants with disabilities needing assistance as well as the type assistance/accommodation requested. Provisions may include but are not limited to qualified interpreters, readers, adequate lighting, handicapped parking spaces, appropriate entrance ramps, appropriate seating arrangements and accessible restrooms for the mobility impaired.

Training: The Communities Connected for Kids training program includes the various communication options



available for auxiliary aids; how to access and utilize these aids; and the responsibility of the agency to provide reasonable accommodation to ensure training is accessible.

Dissemination: A copy of this plan will be posted on the agency's Internet website and internal Intranet for all employees to view.

Revisions: This plan will be updated as needed but at least annually.

Approved: Carol DeLoach

Carol DeLoach, CEO

July 1, 2018