



**If you have any questions regarding this service,
please call our VP of Quality Improvement at
(561) 841-3500 x-1021 or send a letter to the following address:**
Quality Improvement
Community Partners
2001 Blue Heron Blvd W
Riviera Beach, FL 33404-5003

AUXILIARY AID PLAN

Community Partners will provide Auxiliary Aids/Interpreter Services for clients and companions who are deaf/hard-of-hearing and/or communicate in a language other than English at no-cost to the client.

Children will not serve as the primary interpreter for parents or other family members as clients/customers or as companions.

Community Partners will not deny services to any client or companion who is deaf/hard-of-hearing or are limited English proficient.

The VP of Quality Improvement, staff designated by the President & CEO, will serve as the Single Point of Contact (SPOC) and the ADA Coordinator for Auxiliary Aid Service for the Deaf/hard-of-Hearing. The Quality Improvement Coordinator services as the back-up SPOC.

Community Partners shall ensure compliance of staff and contractors with the requirements of Title VI of the Civil Rights Act of 1990, as amended, Title II of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973 and Limited English Proficiency (LEP). Authority: 45 CFR, Part 80, and Florida CFOP 60-16. All Housing Partnership employees are required to complete training in ADA Compliance and the provision of Auxiliary Aid/Free Interpreter Service to Clients/Companions who are Deaf/Hard-Of-Hearing within the first 60 days of the 90 day provisional period of employment and annually thereafter.

Community Partners will retain a signed Attestation of the employees understanding of the ADA Compliance Laws and SPOC in the personnel record.

The SPOC, or QI Department, will monitor annually employee compliance with the training requirement via chart monitoring and/or the employee's electronic training transcript such as Relias.

All Community Partners locations will maintain in reception areas, the Department of Children & Families posting of the following:

- Interpreter Services for the Hearing Impaired
- DCF Non-discrimination Policy
- Services to Clients with Limited English Proficiency

All interpreter service vendors are required to submit evidence of certification/credentials of the qualified interpreters. Verification will be retained by the SPOC or designee.

All agency groups, meetings, and conferences will assure accessibility to clients/companions who have disabilities or require an auxiliary aid.

All postings, brochures, and advertising of services will document the accessibility including the use of 711 Relay.

Auxiliary Aid equipment is maintained and inspected by the QI Department.

Although the agency has TTY capability, all staff use 711 Relay for telephone contact with clients who are deaf/hard-of-hearing.

Upon approval by the Senior Leadership Team, the Auxiliary Aid Plan will be posted on the Agency website as required by DCF/HHS and will be made available in alternative forms and languages as requested.

If Consumers and Companions are referred to other agencies, the attending staff or SPOC will ensure the receiving agency is notified of the Consumer or Companion's preferred method of communication and any auxiliary aid for service needs. In order to accommodate this effectively, the attending staff or SPOC will ensure the referral is approved by the Consumer with a signed Release of Information for each referral being made. These activities will be recorded and maintained in the Consumer's record. (Record Retention is until 2020 or 7 years from last service event whichever is greater). Auxiliary Aid Record Monthly Summary Reports are submitted monthly to DCF Southeast Region Office of Civil Rights.

COMMUNITY PARTNERS NON-DISCRIMINATION POLICY

No person shall, on the basis of race, color, religion, national origin, sex, age, disability, sexual orientation, or gender identity, 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 Community Partners.

AUXILIARY AID PROCEDURES

1. At Screening/Enrollment/Intake, staff with first client contact will document in the record if the client or client companion
 - a. Is deaf/hard-of-hearing
 - b. Communicates in a language other than English
 - c. Utilizes 711 Relay
 - d. Requires any special accommodation
2. Staff will notify client/client companion/client referral source of the availability of no-cost interpreter services for primary languages and auxiliary aids for the deaf/hard-of-hearing.
3. The client/companion preference will be the primary consideration when determining the auxiliary aid or service to provide.
4. If the client/companion is deaf/hard-of-hearing, Central Intake/or Program Staff with first client contact by phone will:
 - a. Document in the client record, a Client Alert message:
 - i. *"Schedule Nationwide Interpreter Resource, Inc. Sign-Language Interpreter" (via QI Coordinator x1020)*
 - ii. *"Schedule/Use a MMA (Managed Medical Assistance) Plan Interpreter accessible by phone" (if applicable)*
 - iii. *"Access staff interpreters via Staff Interpreter Directory" for immediate interim interpreter provision.*
 - iv. *"Reserve an Assistive Listening device via Quality Improvement Coordinator x1020"*
 - v. *(CART, Video Relay, and Video Remote have not been implemented at this time.)*
 - b. Contact QI Coordinator (x1020) to schedule the approved Community Partners Interpreter vendor.
 - i. MMA Plan services will be the first option for languages other than English *(if applicable)*.
 - ii. Nationwide Interpreter Resource, Inc. In-person interpreters will be the first option for deaf/hard-of-hearing.
 - iii. Assistive Listening Devices are available from Quality Improvement at the main location for immediate access. Devices may be reserved in advance or signed out for immediate need. The Quality Improvement Coordinator or the VP of Quality Improvement is available by agency cell phone if there are questions regarding the Assistive Listening device.

1. For urgent, same-day, in-person services, contact the QI Coordinator or MMA Plan services by telephone and follow-up with the electronic request.
2. For non-urgent, future/scheduled appointments contact the QI Coordinator (x1020) or MMA Plan services can be scheduled electronically using the approved vendor request form.
- c. Schedule the appointment upon confirmation from the vendor that the interpreter is available.
- d. Copy the agency SPOC on;
 - i. All Interpreter Service Vendor Requests and confirmations
 - ii. All signed DCF Customer/Companion Waiver for Free Interpreter Service Forms.
- e. In order to meet the contractual obligation with the vendor to provide 48 hours' notice of cancellations, confirm the appointment with the client 48 hours before the scheduled time.
 - i. MMA Plan services may require advance scheduling and cancellation (*if applicable*).
- f. Schedule the date and time of the service as a two-hour time block to allow extra time for interpreting.

5. Administrative or Program Staff will

- a. Confirm all appointments 2 days prior to the service.
- b. Ensure that all scheduled interpreters are canceled with 48 hours' notice when a client appointment is canceled with notice.

6. During the first face-to-face contact, program staff will

- a. Complete the full DCF *Customer/Companion Communication Assessment & Auxiliary Aid/Service Record* form/screens in the client record.
- b. Complete and obtain client or companion signature on the DCF *Customer/Companion Waiver for Free Interpreter Service or Auxiliary Aid*

- c. Schedule the date and time of future service as a two-hour time block to allow extra time for interpreting.

- d. Contact the QI Coordinator (x1020) for the approved Community Partners Interpreter vendor.

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- ii. Nationwide Interpreter Resource, Inc. In-person interpreters will be the first option for deaf/hard-of-hearing.
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- f. Copy the agency SPOC on;

- i. All Interpreter Service Vendor Requests and confirmations
- ii. All signed DCF Customer/Companion Waiver for Free Interpreter Service Forms.

- g. In order to meet the contractual obligation with the vendor to provide 48 hours' notice of cancellations, confirm the appointment with the client 48 hours before the scheduled time.

- i. MMA Plan services may require advance scheduling and cancellation.

7. When appointments are scheduled, Intake Staff are to contact the QI Coordinator for interpreter services approved and sub-contracted vendors by Community Partners

8. Walk-Ins:

a. All efforts will be made to provide interpreter services or Auxiliary Aid for clients who are Deaf/Hard-Of Hearing within 2 hours of walking into the agency for non scheduled visits.

b. MMA Plan services will be used for clients who communicate in a language other than English. (*if applicable*)

9. Housing Partnership staff is required to contact the agency SPOC or the back-up;

a. In the event a client presents for services and an auxiliary aid is not timely. No client is to be turned away due to lack of an auxiliary aid. The SPOC is required to make all efforts to obtain the appropriate auxiliary aid.

b. In the event that the auxiliary aid is not effective

c. In the event the auxiliary aid is denied.

10. Clients/client companions will be provided with a Customer Feedback form on the auxiliary/interpreter services after use of the auxiliary aid service to determine effectiveness and satisfaction with the service.

a. Assistance in completing the form will be provided as requested by the client/client companion.

b. All completed forms are to be forwarded to the agency SPOC through inter-office mail or email.

11. Requests for change of auxiliary services/interpreter service will be accepted and provided as needed.

12. A copy of the completed Auxiliary Aid Assessment/Service Record must be maintained by the Agency SPOC via the electronic medical record of the client.

13. Customers or clients who would like to file a grievance may contact the Community Partners VP of Quality Improvement or the resources listed below:

Julie Dolan, SPOC-Quality Improvement

jdolan@cp-cto.org

Community Partners, Inc.

2001 W Blue Heron Blvd

Riviera Bch, FL 33404

(561) 841-3500 x1021

Assistant Staff Director for Civil Rights

Department of Children and Families (DCF)

Office of Civil Rights

1317 Winewood Boulevard, Building 1, Room 110

Tallahassee, FL 32399-0700

(850) 487-1901; or TDD (850) 922-9220; or Fax (850) 921-8470

Executive Director

Florida Commission on Human Relations

2009 Apalachee Parkway, Suite 100

Tallahassee, FL 32301-4857

850-488-7082

Disability Rights Florida

2473 Care Drive #200

Tallahassee, FL 32308

United States Department of Health and Human Services (HHS)
Attention: Office for Civil Rights
Atlanta Federal Center, Suite 3B70
61 Forsyth Street, SW
Atlanta, Georgia 30303-8909
(404) 562-7888; TDD/TTY (404) 331-2867; or Fax (404) 562-7881