

**General Civil Rights Policies and Procedures**

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## Accessibility of Services

**Policy:** AVDA is committed to ensuring quality and supportive services are provided to, and prohibits bullying/harassment of, persons, including those who identify as LGBTQ, regardless of race, color, religion, sex, age, national origin or ancestry, gender, disability status, military status, veteran status, marital status, sexual orientation, gender identity or expression, citizenship, immigration status, language spoken, genetic information, familial status or any other basis protected under federal, state, or local laws.

1. Participation in supportive services shall be voluntary and no punitive action shall be taken against those who do not participate.
2. Counseling, service management, and advocacy services offered shall be empowerment-based, woman-centered, and survivor-directed.
3. All services offered through AVDA's Emergency Shelter and Outreach departments are free of charge. AVDA's Transitional Housing program charges fees according to the HUD guidelines.
4. Staff is prohibited from conducting background checks on individuals who are seeking or receiving any center service.
5. To ensure that all person have meaningful access to services, staff and volunteers are prohibited from engaging in actions that would constitute unlawful discrimination or harassment.
6. AVDA enforces its policies and trains all staff within 90 days of the FCADV contract on how to prevent and responds to harassment or bullying in all forms.
7. AVDA monitors, addresses claims, and documents corrective actions through the Grievance Procedure.

### Procedure

#### Services Offered

All services are empowerment based and facilitated by trained staff for the purposes of addressing the needs of adult and child participants.

1. 24-hour hotline – crisis hotline answered 24 hours per day, seven days per week.
2. Emergency Shelter – 6-week emergency housing with no limit on re-entry into shelter services.
3. Transitional Housing – 2 years of transitional living to achieve economic independence.
4. Outreach Advocacy – direct and active individual and group support of participant's process in achieving goals.
5. Safety Planning – planning for safety in all areas of participant's life events.
6. Advocacy – intervening with the various social and legal agencies on behalf of the participant, including legal advocacy, medical advocacy, housing advocacy, interpretation services, and additional services.

7. Supportive and Educational Counseling – individual and group support that addresses the needs of participants and their children, information on the dynamics of domestic violence, crisis counseling, and supportive counseling.
8. Service Management – information and referrals, addressing needs, identifying resources, supporting decisions, and coordinating activities pertaining to the accomplishment of participant goals.
9. Child Assessment – evaluation of the basic needs of children served by the center and the referral of children to services, if needed.

#### **Assessing for Appropriate Services**

1. During initial contact with participants, staff shall assess for
  - a. Eligibility for support and intervention services
  - b. Immediate safety
  - c. Batterer’s potential for lethality
  - d. Dynamics in relationship to assure the person requesting services is the survivor rather than the perpetrator
  - e. Special needs based on differing abilities
  - f. Special needs based on the requirements of a person’s self-identified religious, cultural, ethnic, geographic factors or other affiliations
  - g. Other appropriate services

#### **Availability of Services**

1. Emergency Shelter Advocates are available to meet with participants 24 hours per day, seven days per week.
2. Outreach and Transitional Staff will be available beyond normal business hours based on the needs of the participants.
  - a. Appointments are typically scheduled to coincide with the participant’s needs.
  - b. Outreach Advocates are available to meet participants at a safe space in the community if more convenient for the participant.

## **Accessibility for Persons with Disabilities, Visual Impairments, and Limited English Proficiency**

**Policy:** AVDA is committed to ensuring equal provision of quality and supportive services are provided to program participants with disabilities, visual impairments, and limited English proficiencies.

### **Procedure**

1. Persons with disabilities who require special care due to mental or physical disability shall be eligible for AVDA's services and reasonable accommodations will be made, including but not limited to, permitting them to bring their caretaker or service/emotional support animals with them.
2. Participants with visual impairments will be provided options to accommodate their preferred method of communication utilizing the Division for Blind Services, National Federation for the Blind, and/or Lighthouse for the Blind.
  - a. Printed resources in Braille and on tape provided by the Florida Coalition Against Domestic Violence are available onsite for participants to access.
3. AVDA's bilingual staff or the Optimal Phone Interpreting service will serve persons with limited English proficiency.
4. AVDA staff will follow all policies and procedures to serve individuals with disabilities, visual impairments, and limited English proficiency outlined in AVDA's Auxiliary Aids and Civil Rights Guide.

## Accessibility for Persons Who are Deaf and Hard of Hearing

**Policy:** AVDA is committed to ensuring equal provision of quality and supportive services are provided to program participants who are Deaf and Hard of Hearing.

### Procedure

1. AVDA provides auxiliary aids to participants, including but not limited to, a webcam, pocket talker, TTY machine, and sign language interpreters.
  - a. An ADA kit with Auxiliary Aids is available onsite at AVDA.
2. AVDA will obtain informed, written consent using an Authorization for Release of Information when utilizing outside service providers to assist in communication with a participant who is Deaf or Hard of Hearing.
3. AVDA staff will complete all Department of Children and Families forms to document service provided for participants who are Deaf and Hard of Hearing.
  - a. Record retention for services related to participants who are Deaf and Hard of Hearing will be for a period of 10 years.
4. AVDA staff will follow all policies and procedures to serve individuals who are Deaf and Hard of Hearing outlined in AVDA's Auxiliary Aids and Civil Rights Guide.

## Notice to Public Regarding Non-Discrimination and Availability of Auxiliary Aids

**Policy:** AVDA is committed to ensuring that all printed materials being distributed to the public, including our website, includes our Non-Discrimination Statement and availability of Auxiliary Aids.

### **AVDA's Non-Discrimination Statement**

Aid to Victims of Domestic Abuse, Inc. is committed to providing services to eligible individuals regardless of race, color, religion, sex, age, national origin or ancestry, gender, disability status, military status, veteran status, marital status, sexual orientation, gender identity or expression, citizenship, immigration status, language spoken, genetic information or any other basis protected by federal, state or local laws.

### **Procedure:**

1. Any printed materials, including AVDA's website, that promote AVDA's services shall include AVDA's Non-Discrimination Statement
2. Any brochures, pamphlets, or flyers for training, meetings, seminars, or fundraising shall include: "Auxiliary aids and interpreters available upon request and at no charge".
  - a. For each specific event, you must include:
    - i. The name of the contact person
    - ii. Phone number
    - iii. A date by which the person must request such assistance
      1. When deciding the date, consider the time needed to obtain the service without incurring last minute additional fees. Sample wording "The accommodation will be available if requested 5 or more days prior to the event.
    - iv. The registration process will include a method for determining the number and type of persons with disabilities or LEP needing assistance as well as the type of personal assistance or accommodation requested.
3. Written materials routinely provided in English are to be available in regularly encountered languages other than English.
  - a. Based on Census information for PBC (2011), distributed materials need to be available in Spanish.

## Staff Responsible for Compliance

**Section 504 Compliance Coordinator** – President & CEO is the designated person to coordinate Section 504 compliance activities

**Single Point of Contact (SPOC)** – Residential Services Manager to ensure effective communications with deaf or hard of hearing customers or companions; employee awareness of requirements, roles and responsibilities; ensure that notices are posted; and complete all reporting required by SPOCs set forth by FCADV and DCF.

**Residential Services Managers** – designated staff to work in conjunction with the Program Services Director to ensure that the needs of the participants are met and that the employees are aware of their responsibilities, roles, and requirements.

**Business Operations Director** – designated person to ensure that reasonable accommodation requests from employees and applicants are addressed

**Program Service Staff** – responsible to ensure effective communications with deaf or hard of hearing customers or companions; to be aware of and responsible for compliance with the Civil Rights Statutes so that services are provided without regard to race, sex, color, age, national origin, religion, mental or physical ability, sexual orientation, gender identity, veteran or military reserve status, immigration status, or language spoken.

## State and Local 504 Coordinators

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