

ACCESS AND ACCESSIBILITY PLAN

PURPOSE

It is the policy of Directions for Living to provide accessibility to its services and equal job opportunities for all individuals with disabilities and to promote accessibility and the removal of barriers for the persons served and other stakeholders. Directions for Living engages in ongoing planning to address the needs of persons served, personnel, and other stakeholders.

PROCESS

An annual review is conducted to identify and address plans to improve accessibility and to remove barriers in order to:

- Enhance the quality of life for persons served;
- Implement nondiscriminatory employment practices;
- Meet legal and regulatory requirements; and
- Meet the expectations of the stakeholders in the area of accessibility.

An accessibility plan is revised on an annual basis for each location. This plan addresses time lines for removal of identified barriers and any actions for removal of identified barriers. The following areas are addressed in the annual transition plan:

a. Architecture

Identification of any architectural or “physical” barriers including any real or potential impact for preventing access to a building for mobility, visual or hearing challenged individual.

b. Environment

Identification of barriers, location or characteristics of the setting that compromises, hinders, or impedes service delivery and the benefits to be gained, including safety or confidentiality concerns. In addition, lack of sound proofing, noise level or uncomfortable furnishing décor and furnishing that may impact the comfort level of persons served and personnel.

c. Attitudes

Identification of barriers such as terminology and language that is used in literature or in communications with persons with disabilities, other stakeholders, and the public. Identification of how persons with disabilities are viewed and treated by the organization, their families and the community; whether consumer input is solicited and used; and whether or not the eligibility criteria of the organization screens out individuals with a specific type of disability.

d. Finances

Identification of barriers to accommodations based on ability to pay for service, for example, lack of funding to provide services, treating individuals with specific payers differently and providing services to self-pay first over Medicare/Medicaid persons served.

e. Employment

Identification of barriers that would preclude or inhibit individuals from applying for employment or would result in current employees with disabilities being treated differently or not able to participate in all staff related functions.

f. Communication

Identification of barriers for individuals who are hearing or vision impaired. Review of availability of TDD telecommunication device for the deaf and availability of other forms of communication such as CD, Braille, written materials, etc.

g. Transportation

Identification of barriers for individuals who may not have reliable transport or who may need special assistance to access facilities to receive services. Address issues in regards to individuals who may not be physically or otherwise able to access a particular facility or to participate in the full range of services and other activities. Ensure that persons are not precluded the ability to receive services due to transportation issues.

h. Community integration, as appropriate

Identify any barriers that would keep the persons served from returning to full participation in their community of choice.

- i. Any other barriers identified by persons served, personnel or other stakeholders

Identify any other barriers through satisfaction surveys, telephone polls, facility groups, etc., to elicit information and recommendations for resolution; repairs, changes to the facility or program/services, etc.

POLICIES

- a. Accessibility and Auxiliary Aids

This policy and procedure addresses the process for requesting and providing a reasonable accommodation for persons served, personnel and other stakeholders as well as appropriate planning and execution of future new construction to ensure compliance with ADA guidelines and the needs of impacted individuals.

A grievance policy and procedure is attached to provide impacted individuals with a process for having concerns/issues addressed in a timely, safe and respectful manner.

This plan also addresses provision of interpreters, other communication methods and other issues; however, a more extensive process for addressing these specific needs is located in the Auxiliary Aids Plan for Persons with Disabilities and Limited English Proficiency.

- b. Auxiliary Aids Plan for Persons with Disabilities and Limited English Proficiency

This plan addresses procedures and approved services to address the needs of clients, personnel and other stakeholders for provision of interpreters and information in other formats, such as CD, Braille, etc.

- c. Logs

Logs of requests for interpreter services will be maintained. Some requests for a reasonable accommodation may not rise to the level of logged documentation; i.e. provision of services on first floor of building for mobility challenged individual; provision of services in home for transportation challenged individual unless it involves more complex planning and processing to ensure accessibility to services/programs.

B. NEW CONSTRUCTION OR ALTERATIONS

1. New construction or future alterations of facilities that provide public accommodation shall conform to the ADA Accessibility Guidelines.
2. An annual survey of the facilities, using ADA Accessibility Guidelines will be conducted by the Title VI, Section 504/ADA Coordinator or designee. Recommendations for structural modifications, if appropriate or necessary, shall be made. Any other structural alterations occurring in conjunction with a reasonable accommodation for a specific individual shall be handled on a case by case basis.

C. ACCOUNTABILITY

The Senior Director of Human Resources is the designated Title VI, Section 504/ADA Coordinator for the organization and is responsible for the overall coordination of development and implementation of nondiscrimination delivery of equally effective and equally accessible quality services.

D. NOTIFICATION

The Americans with Disabilities Act poster will be displayed in each facility lobby. The title, office address, days and hours available for the designated Title VI, Section 504/ADA Coordinator will be listed on the poster to assure accessibility to clients, employees and job applicants. Descriptive information on the availability of auxiliary aids and reasonable accommodations to persons requiring assisting devices or aids will be included in announcements related to meetings, workshops, as well as to services offered.

E. GRIEVANCE PROCEDURE

1. Any client, potential client, job applicant or employee who has a grievance or concern relative to the provision of auxiliary aids or other reasonable accommodation which impacts admission or access to treatment or employment opportunities in the programs provided by Direction for Living may file a grievance in accordance with the following procedure:
 - a. The grievance shall be presented in writing within five (5) days after the aggrieved person has knowledge of the occurrence of the alleged discriminatory practice or situation. The complaint must be forwarded to the appropriate Supervisor and the Title VI, Section 504/ADA Coordinator. It must contain the name, address and phone number of the aggrieved

person and describe the facts and circumstances of the alleged violation and the date of the occurrence.

- b. An investigation of the allegations will be monitored by the Senior Director of Human Resources acting as the Title VI, Section 504/ADA Coordinator. The Title VI, Section 504/ADA Coordinator will maintain the files and records relating to the case. The supervisor will review the complaint and conduct the investigation in conjunction with the Title VI, Section 504/ADA Coordinator. A report of the complaint and investigatory process and recommended actions will be presented to the appropriate Director within thirty (30) days of the receipt of the complaint unless there are extenuating circumstances in the fact finding process which require an extension of the deadline. Approval and length of such extension shall be determined by the appropriate Director. The decision reached upon completion of the investigatory process shall be communicated to the grieving party.
- c. If the situation is not resolved at this step, the client, potential client, job applicant or employee may request, in writing, a grievance with the next level Supervisor. The written request must be made within five (5) working days of the initial decision. The next level supervisor must meet with the aggrieved party within ten (10) working days of receiving the notice.
- d. If the aggrieved party does not feel a satisfactory solution has been reached at this level, then a written appeal, with a copy to the Supervisor, may be made to the President & CEO within five (5) working days of the previous grievance meeting. The President & CEO must meet with the appealing party within ten (10) working days of receiving notice of the grievance meeting request unless there are extenuating circumstances requiring an extension of the time frame.
- e. The President & CEO will review investigatory materials, recommended actions and consult with the Title VI, Section 504/ADA Coordinator. After review, the President & CEO will issue a written determination with regards to the merit of the complaint and any appropriate action which will be taken to resolve the issue. The decision of the President & CEO shall be final.

F. TRAINING

- 1. All new employees will be informed of the Accessibility Plan at New Hire Orientation with refresher trainings occurring annually.

2. Directions for Living will provide training within 60 days of employment to appropriate staff and vendors to include an awareness of the needs of the hearing impaired and other individuals with disabilities, community resource options, how to access auxiliary aids, "reasonable accommodation" requirements for disabled employees, and equal opportunity employment.

G. COMPLIANCE MONITORING

Monitoring for ensuring compliance with the plan will be done through annual updates, facility surveys, and review of special accommodation requests, complaint investigations and other related compliance activities.

H. PLAN UPDATES

A review and update of the Accessibility Plan will be completed annually. Through this annual review the need for revisions or adjustments as well as an assessment of the effectiveness of the plan will be determined and appropriate revisions to the plan or actions will be implemented.

AUXILIARY AIDS PLAN FOR PERSONS WITH DISABILITIES AND LIMITED ENGLISH PROFICIENCY

PURPOSE

This plan provides the policies and procedures for Directions for Living to ensure:

- A. That all clients and/or applicants for services who are with impaired sensory, manual or speaking skills have equal opportunity to use and benefit from Directions for Living's services.
- B. That qualified persons, due to their limited ability to speak, read, write or otherwise understand the English language, are not excluded from or denied equal access to Directions for Living's services.
- C. That reasonable accommodation(s), as needed, are made available to the above clients and applicants to ensure that they are not denied full participation in Directions for Living's services.

SCOPE

The policies and procedures described in this plan apply to all Directions for Living staff to ensure compliance with civil rights laws applicable to providing services to DCF clients.

AUTHORITY

- A. Policy and Procedure #9109 Accessibility and Auxiliary Aids
- B. Directions for Living Cultural Competency/Diversity Plan
- C. Directions for Living Equal Employment/Affirmative Action Plan
- D. Section 504 of the Rehabilitation Act of 1973.
- E. The Americans with Disabilities Act of 1990.
- F. Title VI of the Civil Rights Act of 1964.
- G. Title VII of the Civil Rights Act of 1964.

H. Department of Health and Human Services, Office for Civil Rights; Policy Guidance; Title VI Prohibition Against National Origin Discrimination As it Affects Persons With Limited English Proficiency(LEP).

POLICY

Directions for Living will provide auxiliary aids to all persons with impaired sensory, manual or speaking skills and provide interpreters for persons with limited proficiency in the English language and appropriate assistance necessary to afford such persons equal opportunity to access and benefit from the services administered by Directions for Living.

A. Auxiliary aids for clients with sensory impairment may include:

1. Florida Relay Services (FRS) — A service offered to all persons in the state which enables a hearing person to communicate with a persons who is hearing or speech impaired through a specially trained operator called a communications assistant.
2. Braille, Large Print, Audio-Tapes and Computer Disks; Certified sign language interpreters, Note takers and Readers, and Pocket Talkers.

B. Assistance for persons with limited proficiency in English may include:

1. Hiring bilingual staff
2. Hiring staff interpreters
3. Arranging volunteer community interpreters
4. Telephone interpreter services such as Pacific Interpreters, Inc.
5. Contracting outside interpreter services

All qualified clients or potential clients are entitled to equal opportunity to use and benefit from Directions for Living services. This includes reasonable accommodations to ensure that Directions for Living services 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.

Auxiliary aids will be available for use by clients, potential clients, employees and applicants with impaired sensory, manual or speaking skills or limited English proficiency in each phase of the service delivery or employment process when the lack

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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.

ACCOUNTABILITY

Directions for Living Senior Director of Human Resources with input from leadership team are responsible for the development and implementation of this plan. The Senior Director of Human Resources is the designated Title VI/Section504/ADA Coordinator for Directions for Living and is responsible for the coordination, development and implementation of procedures ensuring the nondiscriminatory delivery of equally effective and equally accessible quality services. **The Customer Service Supervisor, or designee will act as the SPOC for all service locations.** All employees are responsible for ensuring equal accessibility and equally beneficial services to all clients and potential clients of Directions for Living.

PROCEDURES

The following procedures are to be followed by Directions for Living employees in providing auxiliary aids to persons with disabilities and providing interpreters for persons with limited proficiency in the English language:

- 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 representative and the SPOC (NOTE: Hearing impaired clients or those clients with limited proficiency in the 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 the beneficiary to reveal to family members and friends personal information critical to their care.)
- B. The use of minor children for interpreting is prohibited.
- C. **It is the responsibility of all Supervisors, the SPOC (Customer Service Supervisor or designee) and the Compliance Officer to ensure that appropriate auxiliary aids or interpreters are provided for the client or applicant.** When obtaining auxiliary aids, every effort should be made to utilize the Directions for Living's current resources. However, if auxiliary aids or interpreters need to be obtained from outside Directions for Living, payment will be made from the appropriate operating budget.

- D. Auxiliary aids shall be provided as soon as reasonably feasible or as otherwise required. Provision will be made for communication alternatives when advance notice for auxiliary aids is not given.
- E. If an individual requests an auxiliary aid that is not readily available or a barrier removal that is not easily achievable, the request shall be forwarded in writing to the Title VI, Section 504/ADA Coordinator for review with the appropriate Director. See also policy 9109 Accessibility and Auxiliary Aids.
- F. During the initial needs assessment, client needs are to be assessed through consulting with the client or potential client concerning the preferred communication mode and, if applicable, with the assigned caseworker, counselor, therapist, parent, other family member, guardian, or other representative and the Title VI, Section 504/ADA Coordinator (Senior Director of Human Resources). Clients or applicants must be informed of the availability of auxiliary aids or interpreters and that the agency will provide these services at no cost to them. The clients/applicants' wishes and needs for auxiliary aids or interpreters are the primary concern when deciding on the appropriate auxiliary aids or interpreters.
- G. Posters containing information about the availability of auxiliary aids and Limited English Proficiency are in all service center locations.
- H. When meetings, conferences or seminars are scheduled, information will be included in the advertisement, conference registration materials or meeting notices that persons with disabilities or Limited English Proficiency will be provided with necessary auxiliary aids or interpreters at no cost to them. 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 or Limited English Proficiency needing assistance as well as the type of 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, accessible restrooms for the mobility impaired and interpreters for Limited English Proficiency participants.
- I. If a client's auxiliary aid or service is ineffective, staff shall consult with the SPOC and/or Title VI, Section 504/ADA Coordinator. See also policy 9109 Accessibility and Auxiliary Aids.

TRAINING

All staff will be trained within 60 days of beginning employment and annually thereafter, on how to assist sensory and mobility impaired or Limited English

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Proficiency clients in obtaining assistive devices and/or aids or other reasonable accommodations. Refresher trainings will occur annually. Such trainings will include:

- A. Procedures for serving hearing-impaired, sight-impaired, mobility impaired and Limited English Proficiency clients and potential clients.
- B. Awareness of hearing impairments and deafness; speech impairments; sight impairments and blindness; reading impairments and dyslexia; and mobility impairments.
- C. Communication options available.
- D. How to provide reasonable accommodations for qualified clients and potential clients, i.e., how to access or purchase Auxiliary Aids, interpreter services and physical modifications.
- E. Requirements for making meetings, conferences and services accessible.
- F. Awareness of Auxiliary Aids and Limited English Proficiency Plan.

DISSEMINATION

A copy of this plan will be available to all Directions for Living staff. Copies are distributed upon request to individuals or organizations serving persons with disabilities or Limited English Proficiency.

REVISION

This plan will be reviewed annually and updated as needed. Following annual revision, the Staff Development Trainer will conduct an annual refresher for all staff.

ASSESSMENT

To ensure meaningful access to the Directions for Living services, each location will assess its language needs by:

- A. Identifying the non-English languages that are likely to be encountered in its programs and estimating the numbers of Limited English Proficiency persons eligible for services that are likely to be affected by its program. This can be done by reviewing census data, client utilization data and community's organizations.
- B. Identifying at first contact the preferred language, including dialect and American Sign Language, of each Limited English Proficiency client and recording this

information in the clients file as well as that of the accompanying legal parent, guardian or other adult.

- C. Inform clients about the purpose of collecting data on race, ethnicity and language.
- D. Emphasize that such data is confidential and will not be used for discriminatory purposes.
- E. A client does not have to provide the information if he or she chooses not to provide such information, unless required by law.
- F. Identifying the points of contact in the program or activity where language assistance is likely to be needed.
- G. Identifying needed resources, location and availability of these resources.

TRANSLATION OF WRITTEN MATERIALS

Written material routinely provided in English to applicants, clients and the public are to be available in regularly encountered languages other than English. It is vital that documents be identified and translated into the non-English language of each regularly encountered Limited English Proficiency group eligible to be served or to be directly affected. Each program office will make sure non-English written materials, such as program forms, brochures, etc., are available to all staff.

Supervisors must ensure that staff use only departmental translated material or that translation of written materials be done by a competent translator. It is important to note that, in some circumstances, verbatim translation of materials may not accurately or appropriately convey the substance of what is contained in the written materials. For Limited English Proficiency persons whose language does not exist in written form, an interpreter must be available to explain the contents of documents.

COMPETENCE AND CERTIFICATION OF INTERPRETERS AND TRANSLATORS

Competency does not necessarily mean formal certification as an interpreter, Directions for Living uses only certified sign language interpreters. However, competency requires more than self-identification as bilingual. Competency requires demonstrated proficiency in both English and the other language, fundamental knowledge in both languages of any specialized terms or concepts peculiar to the covered entity's program or activity, sensitivity to the Limited English Proficiency

person's culture and a demonstrated ability to convey information in both languages accurately. Supervisors must ensure that interpreters are competent in the services and Limited English Proficiency person's language.

APPENDIX A: PROVISION OF INTERPRETER SERVICES FOR HEARING-IMPAIRED CLIENTS

Directions for Living shall provide appropriate interpreter services to persons that are hearing-impaired. Please follow the following instructions and document in client's health record:

STAFF RESPONSIBILITIES

- When a hearing-impaired person contacts the agency for services, staff will make a determination of need, by written communication if necessary, of a sign language interpreter or assistive device. If the hearing-impaired person needs an interpreter:
 - Explain that it will take at least 24-hours to make the required arrangements.
 - Obtain necessary information to contact client for confirmation of scheduled appointment with interpreter.
 - Immediately notify the unit Supervisor or the Single Point of Contact (SPOC) of the need of an interpreter.
 - If the client refuses an interpreter, document the client's refusal.
 - If staff have any questions, or are not familiar with an auxiliary aid or services requested by a customer or companion, they shall immediately notify the unit Supervisor or the SPOC.

SUPERVISORY RESPONSIBILITIES

- Upon notification that interpreter services are needed for a hearing-impaired person, the duties of the SPOC are as follows:
 - If no employee is available, the SPOC shall immediately contact Sheri DeLudos & Associates, Inc. by calling (727) 678-3364 to secure the services of a hearing impaired certified interpreter. These services are available 24 hours a day, 7 days a week.
 - The SPOC is to secure an appointment with a certified interpreter within a period that will not unreasonably delay, impede or deny services to the applicant or client.

- The SPOC is responsible for forwarding bills to the business department for payment. The interpreter service's cost is considered an expense where the service can be identified as occurring on behalf of a specific client or applicant.

TELECOMMUNICATION DEVICES (TDD/TTY)

- Telecommunication Device for the Deaf (TDD) is a generic term encompassing various types of equipment that allow communication via typed messages instead of spoken conversation. One limitation to the use of a TDD is that there must be a machine at each end of the conversation.
- Staff is to call the Florida Relay Service at 1-800-955-8770 (Voice) or 711 for communicating with a person who is hearing-impaired or speech-impaired.

VIDEO REMOTE INTERPRETER SERVICES

- American Sign Language Services Inc.
1-888-SIGN-ASL ext. 320 (1-888-744-6275 ext. 309)
www.ALSservices.com

FEDERAL VIDEO RELAY SERVICE

- Voice phone: 1-888-215-4299
- Website: www.fedvrs.us

CART Services

- Julia LaCava, Inc.
Tampa, Florida, United States, 33629
Phone: 727/744-7655

TELEPHONE INTERPRETER SERVICES

- For eligible refugees and entrants within the state of Florida, Pacific Interpreters, Inc. will provide telephone interpretation, document translation and interpreter training to eligible agencies and organizations at no cost to the eligible client. The ISP program supports clients meeting immigration status of persons with the status of: Amerasian, Asylee, Cuban/Haitian Asylum Applicant, Cuban/Haitian Entrant, Cuban/Haitian Parolee, Refugee, and Victims of Trafficking. Interpreter Services will also be also provided for non-refugees at an agreed upon fee paid for by Directions for Living.

- Telephone interpreter services can be accessed 24 hours per day by following these instructions:

When receiving a call:

1. Use conference hold to place the non-English speaker on hold.
2. Dial 1-800-264-1545
3. A Pacific Interpreters Services Customer Service Agent will ask for your "Access Code" (840574) and name of employee making the call. In addition, the Service Agent will ask for the client's immigration status, alien registration number, date of birth, country of origin and language. (This information is needed to establish payment for the services through the Refugee Program). You will be put on hold momentarily and then an interpreter will be added to your call
4. Once an interpreter has been added to your call, provide your information in three to four sentences or in a logical order so the interpreter can retain the information and interpret it accurately to your client.
5. Please inform the interpreter if you are using a hand held phone versus a speakerphone so they will allow time for the phone to be passed back and forth, before relaying the information.
6. When placing a call to a non-English speaker, begin at step 2.

ASSISTIVE LISTENING DEVICES (POCKET TALKER)

- Williams Sound PKT D1 EH Pocketalker is available at the Customer Service desk for hard of hearing clients.
- The Williams Sound PKT D1 EH Pocketalker can be purchased through Amazon.com.

Pacific Interpreters Quick Reference Sheet

1. Dial the toll-free number shown below. A Pacific Interpreters Customer Service Agent (CSA) will answer.
2. Provide the access code shown below.
3. Inform the CSA of the language you need, or ask for help in determining the language.
4. Advise the CSA if you need to connect to a third party at another location.
5. The CSA will put you on hold until the interpreter is on the line.

Toll-free Number and Access Code

Dial: 1-800-264-1545

ACCESS CODE: 840574

Provide Client's First Name

Provide Client's Last Name

Provide Client's ID Number

Provide Language Needed