

**COVE
POLICY & PROCEDURE**

PROGRAM: Administration

POLICY NO. AD-035

SUBJECT: Auxiliary Aids & Service Plan

POLICY: To reasonably accommodate clients who have a documented disability.

PURPOSE: To optimize the benefit of treatment services for clients.

PROCEDURE:

I. Deaf and Hard of Hearing

A. Serving Potential Clients, Clients, and Companions

1. Reasonable accommodations will be made to assist potential clients, clients, and companions with documented disabilities in programs and services of Cove.
2. Prior to being admitted for services, program staff will formally notify the potential client of his/her right to have a qualified sign language and/or oral interpreter and auxiliary aids provided without charge while participating in program activities.
3. Staff will conduct an assessment to determine the potential client or companion's preferred method of communication. The Customer/Companion Communication Assessment will be completed and maintained in the client record.
4. Staff will consult with the potential client to determine his/her preferred communication method, and if applicable, staff will also consult with the companion. Staff will complete the Customer or Companion Request for Free Communication Assistance Form and this form will be documented in the client record.
5. Sign and oral interpreters that are certified and licensed, as well as auxiliary aids, will be coordinated by contacting Cove's Single Point of Contact (SPOC) in Human Resources. Notification will be made directly to the SPOC or designee who will then contact the contracted providers for aids & services (Florida Relay, CART, Video Remote, Video Relay, or any additional services that the customer/companion specifically requests that the staff may not yet be aware of).
6. An individualized plan, whether for assessment, treatment or service, will be developed that will meet the client's needs in the respective modality of treatment. If multiple or long-term visits will be needed, the Communication Plan for Ongoing Services will be completed. This plan will be maintained in the client record and a copy forwarded to the SPOC.

7. Once admitted to services, the Director, Program Manager, Coordinator, or designee of the program will meet with the client to review the program description and collaboratively determine potential clinical and physical obstacles for participating in treatment.
8. Clients will be presented with the opportunity to be assisted and mentored in the respective program through the “buddy” system. If agreeable, a volunteer client mentor will be assigned to ensure that the hearing challenged client is included in program activities, made aware of unsafe situations, and assisted upon personal request.

B. Timely Requests for Auxiliary Aids or Services

Reasonable accommodations for customers and companions who are Deaf and Hard of Hearing will be provided in a timely manner as coordinated through the agency’s Single Point of Contact (SPOC). Certified sign language interpreters (when requested) are available at the time of scheduled appointment for Deaf and Hard of Hearing clients/companions. A list of certified sign language interpreters is maintained by ACD: Accessible Communication for the Deaf. Family members (including adult and minor children), friends, and untrained volunteers will not be used as interpreters.

1. Scheduled Appointments/Events: If advanced notice is provided to the SPOC, a certified interpreter will be scheduled to be present at the time of the appointment. If the interpreter fails to appear, staff will contact the SPOC in Human Resources for additional actions to make a certified interpreter available to the customer or companion as soon as possible, but in no case later than two (2) hours after the scheduled appointment, or as convenient to the customer or companion.
2. Non-Scheduled Appointments/Events: Staff will immediately contact the SPOC in Human Resources for coordination. A certified interpreter must be provided within two (2) hours of the request, or at least by the next business day.
3. Emergency Situations: In emergency situations an interpreter shall be made available as soon as possible, but in no case later than two (2) hours from the time the customer or companion requests an interpreter, whichever is earlier.

C. Effectiveness of Communication

If an aid is found to be ineffective, staff will collaborate with the client to re-assess and determine an alternate form of communication that will ensure the client/companion fully understands the information being provided and engage appropriately in treatment services.

Each client who is Deaf and Hard of Hearing shall be provided a Customer/Companion The feedback form is provided by clinical staff to the client/companion following every visit. The Customer/Companion Feedback form is provided to the client or companion to determine the effectiveness and appropriateness of the auxiliary aid or service provided and the performance of the interpreter provided. Staff will document the progress notes indicating the form was provided. Staff will provide assistance, if requested, in completing the form. The client/companion will be instructed to mail the form directly to DCF – as this feedback form is anonymous, it will not be included with the client record.

II. Low Vision or Blind, Speech, Sensory, or Mobility Limitations

- A. Reasonable accommodations will be made to assist clients with documented disabilities in programs and services of Cove.
- B. Prior to being admitted for services, program staff will formally notify the potential client of his/her right to have auxiliary aids provided without charge while participating in program activities. The use of assistive devices may be incorporated with relevant services for persons with multiple disabilities such as deafness and blindness.
- C. Staff will conduct an assessment to determine the potential client or companion's preferred method of communication.
- D. Staff will consult with the potential client to determine his/her preferred communication method, and if applicable, staff will also consult with the companion.
- E. Interpreters that are certified and licensed, as well as auxiliary aids, will be coordinated by contacting Cove's Single Point of Contact (SPOC) in Human Resources. Notification will be made directly to the SPOC or designee who will then contact the contracted providers for aids & services.
- F. An individualized plan, whether for assessment, treatment or service, will be developed that will meet the client's needs in the respective modality of treatment.
- G. Once admitted to services, the Director, Program Manager, Coordinator, or designee of the program will meet with the client to review the program description and collaboratively determine potential clinical and physical obstacles for participating in treatment.
- H. The primary counselor will document in the client record the type of auxiliary aid and services provided during the client's treatment services.
- I. Clients will be presented with the opportunity to be assisted and mentored in the respective program through the "buddy" system. If agreeable, a volunteer client mentor will be assigned to ensure that the hearing challenged client is included in program activities, made aware of unsafe situations, and assisted upon personal request.
- J. To accommodate the need for reading requirements of some program components, staff will do the following as considered reasonable by program standards:
 - 1. Read assignments to the client
 - 2. Provide the client a tape-recorded reading assignment and a tape recorder
 - 3. Assign a buddy mentor to read the assigned material

K. Limited English Proficiency (LEP)

- A. Reasonable accommodations will be made to provide services and information in the appropriate language, other than English, for clients who are Limited English Proficient. Clients who are English or Spanish language impaired and/or challenged are eligible for programs of Cove based on assessed needs and recommended level of placement.

- B. Language interpreters that are certified and licensed will be coordinated by contacting Cove's Single Point of Contact (SPOC) in Human Resources. Notification will be made directly to the SPOC or designee who will then contact the contracted providers for aids & services.
- C. Qualified foreign language interpreters (when requested) are available at the time of scheduled appointment for Limited English Proficiency clients/companions at no cost. A list of foreign language interpreters is maintained in the office of the SPOC.
- D. An individualized plan, whether for assessment, treatment or service, will be developed that will meet the client's needs in the respective modality of treatment.
- E. The Program Director, Program Manager, Coordinator, or designee will review the program description with the client and collaboratively determine potential clinical and physical obstacles for participating in treatment.
- F. Cove services and programs strive to provide written material in languages other than English when needed.

IV. Adaptive Devices

Adaptive devices and related equipment, or resources to such, will be made available to clients/companions with special needs. Examples of such devices include:

- Equipment to assist individuals who are deaf or hard of hearing
- Individuals to provide sign language or translation services
- Language assistance
- Mobility assistance
- Materials and equipment for individuals with low vision or who are blind

V. Translation of Written Materials

Translation or alternate forms of documents for clients, companions, and staff to ensure effective communication will depend upon the customer or companions preferred method.

A copy of this Policy and Procedure will be posted on the Cove website to be made available to the public for information purposes for both individuals and organizations. Printed documents including this policy and procedure may be made available in alternate formats upon request to assist in ensuring effective communication.

VI. Denial or Waiver of Auxiliary Aids or Services

No client or potential client will be denied access to services based on any disability. Potential clients, clients, and companions will not be denied reasonable requests for auxiliary aids or services.

If an auxiliary aid is requested, the primary counselor is responsible for signing the aid out for the customer/companion to use during treatment services. The primary counselor is also responsible for collecting the aid once services have concluded.

If the client declines the offer for an interpreter or other auxiliary aids, the Customer or Companion Request For / Waiver of Free Communication Assistance will be completed by the client and maintained in the client record.

VII. Duties of the Single Point of Contact (SPOC)

- A. Ensure information is visibly posted at the entrances of Cove facilities regarding the availability of auxiliary aids to clients and companions who are Deaf and Hard of Hearing at no cost.
- B. Ensure staff conducts an assessment prior to initiating services with a potential client to determine the preferred method of communication. The clinical staff member will complete the Request For/Waiver of Free Communication Assistance Form and Customer Communication Assistance Form. Copies of the completed forms will be maintained in the client record.
- C. Ensure services are provided in a timely manner as outlined above.
- D. Ensure reasonable requests for accommodation are not denied.
- E. Coordinate certified interpreters (PRN employee or through the Cove business agreement with ACD) are available at the time of scheduled appointments. Verification of the interpreter's certifications will be completed by the Human Resources department.
- F. Ensure that staff receives initial and ongoing training on serving Deaf and Hard of Hearing clients/companions as well as how to use the Florida Relay Service.
- G. Update and maintain records of assisted listening devices used by Cove clients/companions during treatment services.
- H. Educate staff and promote awareness of additional communication options for clients/companions including CART (Caption in Real Time Services) and VRI (Video Remote Interpreting).
- I. Maintain a monthly report log of Cove's submissions to DCF by the 5th of every month
- J. Ensure that the agency retains invoices of services and client records for a minimum of 10 years.
- K. Ensure accessibility at meetings, conferences, and seminars for people with documented disabilities, Limited English Proficiency (LEP), or deaf and hard of hearing. This includes ensuring that necessary aids and services are provided for those in attendance.

VIII. Employee Training Requirements

A. New Hires

1. All employees hired by Cove will complete the DCF required Deaf and Hard of Hearing Training within 60 days of beginning employment.
2. Certificates for completed training modules will be printed by the employee.
3. The Attestation of Understanding Form for having completed the training will be completed, signed, and returned to Human Resources along with the printed certificates.

B. Annual Updates

1. Every active employee of Cove will complete the required DCF Deaf & Hard of Hearing Training annually. The notification of training is sent by the Human Resources department.
2. Certificates for completed training modules will be printed by the employee.
3. The Attestation of Understanding Form for having completed the training will be completed, signed, and returned to Human Resources along with the printed certificates of completion.

C. Resources

- Captioning in Real Time (CART) Services
 - CART Providers can be found online at: <http://psl.ncra.org/index.asp>
- Florida Telecommunications Relay, Inc.: DIAL 7-1-1
 - Service provided to residents in Florida who are Deaf, Hard of Hearing, Deaf/Blind, or Speech Disabled
 - Trained Operators are available to receive calls 24 hours per day, 7 days per week, 365 days a year.
 - Utilize a wide array of technologies including teletypewriters (TTYs), Voice Carry-Over (VCO) and Hearing Carry-Over (HCO)
 - Retrieve voicemail and answering machine messages
 - Florida Relay offers services in Spanish, Spanish to English translation, and French

TTY	800-955-8771	If you are using TTY equipment.
Voice	800-955-8770	If you are a standard (voice) user, and are trying to connect with a Relay user.
ASCII	800-955-1339	If you are utilizing a computer.
Voice Carry Over (VCO)	877-955-8260	If you prefer to speak directly to the hearing person. When the hearing person speaks to you, the Relay Operator serves as your "ears" and types everything said to your TTY or VCO phone.

Speech to Speech (STS)	877-955-5334	If you have a speech disability and would prefer to have our specially trained Relay Operators serve as your voice and repeat your responses to the called party.
Video Assisted STS	877-955-5334	<p>Video-Assisted STS supports a one-way video call between the CA and STS user. The video connection assists the CA in understanding the STS user's speech. Callers can enter contact information in the STS Profile to reduce set-up time.</p> <p>In order to use Video-Assisted STS, please inform the Operator after dialing the toll free number that you would like to utilize Video-Assisted STS. You can make this request before or during the call. You may also add this to your customer profile if you would prefer Video-Assisted STS on all calls.</p>
Spanish to Spanish	877-955-8773	If you prefer to conduct your conversations in Spanish.
Spanish to English Translation	844-463-9710	If your primary language is Spanish, however your caller is an English speaker. Our Relay Operators are able to translate your conversation into English.
French to French	877-955-8707	If you prefer to conduct your conversation using the French language
900 Pay Per Call	900-230-6868	With Pay per calls the Relay user is responsible for direct billing. Rates vary depending on the service called.