

Auxiliary Aids Plan: Palm Shores Behavioral Health Center

Palm Shores Behavioral Health Center shall comply with Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. 794, as implemented by 45 C.F.R. Part 84 (hereinafter referred to as Section 504) and the Americans with Disabilities Act of 1990, 42 U.S.C. 12131, as implemented by 28 C.F.R. Part 35 (hereinafter referred to as ADA).

This plan is available in alternative formats at the request of staff and participants. This plan will be distributed to individuals and agencies working with people living with a disability and Limited English Proficient and will be posted on the Palm Shores Behavioral Health Center's website.

Single Point of Contact : The Single Point of Contact, Rebecca L. McDonough, will ensure effective communication with Deaf or hard-of-hearing customers or companions in accordance with Section 504 and the ADA. The Single Point of Contact shall ensure that employees are aware of the requirements, roles, responsibilities, and contact points associated with compliance with Section 504 and the ADA.

Provision of Auxiliary Aids and Services : Palm Shores Behavioral Health Center will at all times recognize that the patient or companion's preference is the primary consideration in determining what auxiliary aids or services to provide. If communication through a specific auxiliary aid or service is deemed to be ineffective, staff will ask the patient or companion to determine a more effective auxiliary aid or service for communication. Documentation shall be made in the patient's file regarding the attempt to improve the effectiveness of auxiliary aids and services. If a participant or companion is Deaf or hard of hearing, Palm Shores Behavioral Health Center's staff shall obtain auxiliary aids according to the communication assessment and the request for services, on a 24/7 basis. All ASL interpreters' certifications shall be verified. *Companion is defined as any person who is deaf or hard-of-hearing and is one of the following:

- 1) A person whom the Customer indicates should communicate with DCF Contracted Service Provider personnel about the Customer, such as a person who participates in any treatment decision, a person who plays a role in communicating the Customer's needs, condition, history, or symptoms to SCF Contracted Service Provider personnel, or a person who helps the Customer act on the information, advice, or instructions provided by DCF Contracted Service Provider personnel;

- 2) A person legally authorized to make healthcare or legal decisions on behalf of the Customer; or
- 3) Such other person with whom the DCF Contracted Service Provider personnel would ordinarily and regularly communicate about the Customer.

Staff that is unfamiliar with the auxiliary aid or service requested shall contact their Single Point of Contact (SPOC), 504/ADA Coordinator (Civil Rights Officer) or their Supervisor, for assistance in locating appropriate resources to ensure effective communication with patients, customers and companions.

Provision of Interpreters in a Timely Manner : Palm Shores Behavioral Health Center staff shall provide interpreters for patients and companions who are Deaf or hard-of-hearing in a timely manner in accordance to the following standards:

a. **Non-Scheduled Interpreter Requests:** For any emergency situation that is not a scheduled appointment, staff shall make an interpreter available as soon as possible, but in no case later than two (2) hours from the time the patient or companion or staff requests an interpreter, whichever is earlier. If the situation is not an emergency, staff shall offer to schedule an appointment (and provide an interpreter when necessary for effective communication) as convenient to the patient or companion, but at least by the next business day.

b. **Scheduled Interpreter Requests:** For scheduled events, staff shall make a qualified interpreter available at the time of the scheduled appointment. If an interpreter fails to appear for the scheduled appointment, staff shall take whatever additional actions are necessary to make a qualified interpreter available to the patient or companion who is Deaf or hard-of-hearing as soon as possible, but in no case later than two (2) hours after the scheduled appointment.

Auxiliary Aids Documentation : Palm Shores Behavioral Health Center shall document the patient or companion's preferred method of communication and any requested auxiliary aids and services provided in the patient's file. Documents and forms evidencing when and how Palm Shores Behavioral Health Center provided auxiliary aids and services to patients or companions shall be retained within the patient's corresponding file for seven years. Forms include but are not limited:

- Customer or Companion Assessment and Assessment and Auxiliary Aid and Service Record
- Customer or Companion Request for Free Communication Assistance or Waiver
- Customer or Companion Feedback form
- Auxiliary Aid Service Record Monthly Summary Report -(This documentation will be maintained for record keeping with the SPOC)

Denied Auxiliary Requests : Documentation, with supporting justification, must also be made if any request was not honored. Palm Shores Behavioral Health Center's Chief Executive Officer is the only person that can deny auxiliary aid requests made by a patient or companion. If a staff person is not familiar with an auxiliary aid request, they will contact the SPOC for information as well as ask their

supervisor for any information that they may need to secure this aid, but reiterate that the cost of any auxiliary aid is the responsibility of the agency and not the participant.

Referrals : If patients or companions are referred to other agencies, PSBHC must ensure that the receiving agency is notified of the patient or companion's preferred method of communication and any auxiliary aid or service needs. In order to accommodate this, PSBHC will ensure that the referral is desired by the participant and that she or he signs a Release of Information Form.

Customer Feedback Form : The provider shall distribute Customer/Companion Feedback Forms to patients or companions that are Deaf or hard of hearing and provide assistance in completing the forms if requested by the patient or companion. The original Customer/Companion Feedback Form shall be mailed to DCF, Office of Civil Rights, 1317 Winewood Boulevard, Building 1, Room110, Tallahassee, FL 32399-0700 by the participant or if requested, by the Domestic Abuse Council, Inc. A copy of the Customer Feedback Form **shall not be kept in the file.**

Documentation/Record Retention : Records relating to auxiliary aids and services provided shall be retained by PSBHC and the original document retained in the patient's file or records. All final requests for accommodations, along with relevant documentation, will be forwarded to the designated 504/ADA Coordinator (Civil Rights Officer).

Signage: The Single-Point-of-Contact will ensure that conspicuous Notices which provide information about the availability of appropriate auxiliary aids and services at no-cost to the Deaf or hard-of-hearing customers or companions are posted near where people enter or are admitted to Palm Shores Behavioral Health Center. The SPOC's name and contact information will be on the Deaf and hard of hearing poster.

HHS Reports: Palm Shores Behavioral Health Center shall submit HHS Reports monthly, no later than the 5th day of each month, to the Contract Manager at the Sarasota Family YMCA, Central Florida Behavioral Health Network (CFBHN), and Eckerd Youth Alternatives, Inc.

ADA Section 504 Coordinator: Sharon Pimley-Fong, (813)558-5656

Event Accommodations: Palm Shores Behavioral Health Center shall ensure accessibility to meetings, conferences and seminars to persons with disabilities, limited English proficiency, and Deaf or hard of hearing by placing the following statement on all event notices and advertisements prior to the event: *Palm Shores Behavioral Health Center will make accommodations for the Deaf and Hard of Hearing with devices that allow for effective communication. Contact: Rebecca McDonough, 941-792-2222 X117*

Staff Training: The staff shall receive training on how to provide auxiliary aids and services for persons with disabilities and limited English proficiency (LEP) within 60 days of commencing employment. Palm Shores Behavioral Health Center direct service staff shall receive an annual refresher training on auxiliary aids and services for persons with disabilities and limited English proficiency (LEP). Direct service staff shall be trained to use the TTY phone and accessing the area's available auxiliary aid resources. Training documentation shall be maintained in each employee's training file.

Auxiliary Aid Resources

Assisted Listening Devices are available at the Reception Desk or through the SPOC.

Florida Video Relay: 7-1-1 Through the Florida Relay Service, people who use specialized telephone equipment can communicate with people who use standard telephone equipment. To call Florida Relay, dial **7-1-1**, or use the appropriate toll free numbers below:

1-800-955-8771 (TTY)

1-800-955-8770 (Voice)

1-877-955-8773 (Spanish)

1-877-955-8707 (French Creole)

Video Remote Interpreting : Through a video remote interpreter people can use an interpreter via technology to communicate with a participant instead of an in person interpreter. This is a good resource for emergency situations with limited time to get an in person interpreter as well as if there are few local community resources for certified interpreters. The following is the phone number for the Registry of Interpreters for the Deaf which will provide contact information for certified video remote interpreting: Registry of Interpreters for the Deaf: 703-838-0030 (Video Remote Interpreters)

CART-Captioning Real Time and Providers : This is the simultaneous conversion of spoken words to text, through computer-assisted transcription or court reporting, and displaying that text on a video screen. This communication service is beneficial to individuals who are Deaf or hard-of-hearing that do not use sign language or for whom assistive listening devices and systems are ineffective:

Deanna C. Boenau, RDR, CRR, CBC, CCP. AmeriCaption, Inc., (941)359-8100

Registry of Interpreters for the Deaf, Florida Registry of Interpreters for the Deaf and Certified Sign Language Interpreters: 703-838-0030 or www.fridcentral.org Approved by DAC/CEO Sept. 2013

Limited English Speaking Services

Language Services Associates (UHS Contracted Service) Instruction Packet available through SPOC.

Customer Complaints : If you believe you were wrongfully denied access to services or discriminated against:

1. Inform the person who denied access to services that you believe they wrongfully denied you services and why you believe that is the case.
2. Ask to speak to a manager/supervisor, immediately.

3. You may submit your complaint/grievance in writing or verbally. Direct your concern to the Advocate Services Manager or Director of Victims Services. Include the following information:

- a. What service were you denied?
- b. What were you told was the reason you were denied service?
- c. What person denied you services?
- d. What was the date you were denied service?

In addition to the above actions, discrimination complaints may also be filed externally with the state and federal government.

Assistant Staff Director for Civil Rights

1317 Winewood Boulevard
Building 1, Room 110
Tallahassee, FL 32399-0700
850-487-1901

Executive Director, Florida Commission on Human Relations

2009 Apalachee Parkway, Suite 100
Tallahassee, FL 32301-4857
850-488-7082

US Department of Health & Human Services , Office for Civil Rights

Atlanta Federal Center, Suite 3B70
61 Forsyth Street, SW
Atlanta, GA 30303-8909
404-562-7881