

FIRST STEP OF SARASOTA, INC.

AUXILIARY AIDS AND SERVICES PLAN FOR
ACCESSING SPEECH, LANGUAGE, AND HEARING SERVICES
2022

PURPOSE:

To assure access to speech, language and hearing services for persons with disabilities, who are deaf or hard of hearing, and/or have limited English proficiency.

In accordance with Section 504 of the Rehabilitation Act of 1973, the Department of Children & Families (DCF), and CFOP 60-10, First Step of Sarasota, Inc. (First Step) will provide at no cost to a person served or their companion, appropriate auxiliary aids, including qualified American Sign Language interpreters to persons with disabilities and qualified foreign language interpreters to persons with Limited English Proficiency where necessary to afford such persons an equal opportunity to participate in or benefit from First Step programs and services.

It is the intent of First Step to ensure that all persons served or companions requiring/requesting auxiliary aid services receive such services.

Auxiliary aids or language interpreters will be available without charge for use by persons served and their companion with impaired sensory, manual, or speaking skills in each phase of the service delivery process e.g., telephone inquiries, requests, intake interviews, service delivery, counseling, complaints, testing, treatment, and training.

Effective communication includes ensuring that individuals and their companions fully understand and are fully able to express themselves which is a fundamental right. Deaf or hard of hearing individuals must be afforded the same access as hearing persons in residential and inpatient settings where individuals are permitted access to a telephone to place and receive calls and/or opportunities to watch television with closed captioning.

The Single Point of Contact (SPOC) and the Section 504 Coordinator for First Step is:

Pam Carter, Director of Health Information Management pcarter@fsos.org The back

up to the SPOC is:

Matt Kauffman mkauffman@fsos.org

If any staff have questions about this procedure or need further information or instructions, the SPOC or back up should be contacted.

Aid Essential Communication:

All First Step services are considered Aid Essential.

An Aid Essential Communication is a situation in which the importance, length, and complexity of the communication is such that the requested auxiliary aid or service accommodation is always provided for the deaf and hard of hearing individual or their companion.

Examples of Aid Essential Communication situations include but are not limited to during:

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- ☐ Determination of psychiatric, psychosocial, medical, nutritional and functional history.
- ☐ Discussion of treatment plans.
- ☐ The provision of person rights, informed consent for treatment and/or medication.
- ☐ Determination and explanation of diagnosis, prognosis, or current condition. ☐ Explanation of medications prescribed.
- ☐ Communication of relevant information prior to or as soon as possible after putting person into restraints including the purpose for using restraint and condition under which restraint will be removed.
- ☐ Evaluations, individual, group, family, or crisis session.
- ☐ Discharge planning and discharge instruction.

Service Requirements:

It is incumbent upon all First Step staff members to ensure that any individual or their companion seeking or receiving services, receives the requested/appropriate accommodation based on individual need or preference.

Any issue for which a denial of auxiliary aid or services to a consumer or companion is being considered will be referred to the SPOC and CAO for deliberation. If a decision is made to deny aid or service, DCF will be contacted for further consultation and resolution.

Accommodation must be provided when requested by the individual/companion or based on the determination of the staff member that accommodation is required in order for the individual/companion to fully participate in services – even if the individual/companion declines assistance. The individual's or companion's preference is the primary consideration in what auxiliary aid or service is arranged and provided.

Should a request be made by a customer or companion for an auxiliary aid or service that is not familiar to the employee, the employee is to contact the SPOC, or designee, for appropriate instructions. If the SPOC or designee is not available, the agency website is to be accessed for needed information or the Florida Relay Service numbers listed below should be contacted for assistance.

If at any time communication through an auxiliary aid or service is determined to be ineffective, the employee will conduct a communication re-assessment to determine which aid or service is appropriate to provide the most effective communication.

Scheduled Appointments:

There must be a **certified** interpreter or other needed accommodation at the time of the scheduled appointment. If for any reason the preferred method of communication is unavailable, a reasonable substitute will be available as soon as possible, but no later than 2 hours after the scheduled appointment time.

Employees will comply with First Step Procedure ADA-102, Public Notice of Compliance with the ADA, in the event that any person served or companion with a disability or limited English proficiency or deaf or hard-of-hearing requires accommodations to participate in meetings. The First Step website will include a link to the mentioned procedure.

Unscheduled Appointments:

The employee will ensure that the preferred method of communication is available within TWO (2) HOURS of a scheduled appointment time or no later than TWENTY-FOUR (24) HOURS of a non scheduled appointment when a customer or companion is deaf or hard of hearing.

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Emergency Situations:

There must be a certified interpreter or other needed accommodation available within 2 hours of the individual/companions arrival for services. Family members, advocates, or friends (at least 18 years of age or older) of an individual/companion should not be permitted to interpret, except when the individual/companion provides written confirmation and acceptance. Children should never serve as interpreters or translators for individuals or their companions.

When such an individual interprets on behalf of the individual/companion, staff should still consider having a certified interpreter present in order to observe, verify accuracy of the communication, and ensure that the communication is effective.

Documentation:

The medical record must include all documentation including:

- ☐ assessments of person/companion need or request for accommodation
- ☐ accommodations provided to individuals or their companions
- ☐ progress notes which indicate the use of accommodation
- ☐ all forms associated with this procedure as indicated
- ☐ any special circumstances

Lists of certified interpreters, qualified foreign language interpreters and copies of interpreter certifications will also be kept in the office of the SPOC.

Documentation pertaining to assessment and provision of accommodations are maintained as part of the First Step medical record and are retained in accordance with procedure.

Referral for Contract Services:

Speech, language and hearing services are considered contract services when they are not provided directly by First Step staff.

When Language Line, VisCom, or other interpreter/translator service is used on behalf of a person, the program supervisor/director must send an email to the Accounts Payable department authorizing the expenditure. The Accounts Payable in the Fiscal Department email address is finance@fsos.org

Communication Assessment:

Staff will consult with the individual/companion to determine which appropriate auxiliary aids and services are needed or requested to ensure effective communication. Assessment should take into account the following:

- ☐ The nature, length, and importance of the communication at issue.
- ☐ The individual/companion disability and communication skills and knowledge.
- ☐ The individual/companion health status or change in health status.
- ☐ The preference or statement of need for an auxiliary aid or service.

Persons served are assessed at initial contact to determine if the individual or their companion requires or requests an accommodation based on being deaf or hard of hearing, disabled, or having limited English proficiency.

At The Time Of First Face To Face Contact:

1. Complete **CUSTOMER or COMPANION COMMUNICATION ASSESSMENT AND AUXILIARY AID or SERVICE RECORD**

The staff member will fully complete this form which will be filed in the medical record. This assessment form is used to document that First Step has determined an accommodation is needed and is being provided.

Persons served/companions who are deaf or hard of hearing and are receiving ongoing services – whether or not they accept or waive communication assistance – will be reassessed at least every 6 months in conjunction with the treatment planning process.

2. Complete **INDIVIDUAL OR COMPANION REQUEST FOR FREE COMMUNICATION ASSISTANCE OR WAIVER OF FREE COMMUNICATION ASSISTANCE**

The staff member and person will fully complete with the request or waiver form on which the person served indicates that they want or waive accommodation. The completed form is filed in the medical record.

Persons served/companions who are deaf or hard of hearing and are receiving ongoing services – whether or not they accept or waive communication assistance – will be asked to complete this form at least every 6 months in conjunction with the treatment planning process.

3. **CUSTOMER/COMPANION FEEDBACK Form** is given to the person served or companion following each contact for which accommodation has been provided.

The person served/companion may complete this form which **IS NOT** to be copied or kept in the medical record. The person served should be asked to mail the completed form to the address indicated on the form. Staff can also provide an envelope to assist the person with mailing the completed form.

Note: The Feedback Progress Note Customer Survey Form will be completed when the feedback form is given to the person served and filed in the medical record.

Should feedback be received informing that an auxiliary aid or service for persons served or companions was ineffective; the feedback should immediately be reported to the program supervisor/director and action taken to resolve the matter to the mutual satisfaction of the person within 24 hrs. In this instance, the Single Point of Contact should be notified.

Complete **COMMUNICATION PLAN** for persons who receive multiple or ongoing services.

This form is completed fully and filed in the medical record. It will outline:

- ☐ the type of accommodation needed and
- ☐ the individual or department responsible for ensuring that the accommodation is arranged and in place every time the person is served.

Types of Accommodation:

For persons served with a hearing impairment, the following are contacts to be used in order to ensure that the person is provided the requested or needed services.

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1. For Sign Language Interpretation:

VisCom – American Sign Language Interpreting Services

941-363-1318 or viscomoffice.com

This service is available 24/7

Deaf and Hard of Hearing Center of Southwest Florida
239-461-0334

2. Florida Relay is the communications link for people who are Deaf, Hard of Hearing, Deaf/Blind, or Speech Impaired. Through the Florida Relay, 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 following toll free numbers:

- 1-800-955-8771 (TTY)
- 1-800-955-8770 (Voice)
- 1-800-955-1339 (ASCII)
- 1-877-955-8260 (VCO-Direct)
- 1-800-955-5334 (STS)
- 1-877-955-8773 (Spanish)
- 1-877-955-8707 (French Creole)

3. Assistive Listening Devices: For a person who is hard of hearing, an Assistive Listening Device (ALD) may be required in order for the person to benefit from one-on-one counseling or group counseling or to participate in presentations or trainings.

Assistive Listening Devices are available at every program location.

4. First Step does not have access to TDD/TTY equipment, but can accept phone calls from individuals who use these items to communicate.
5. First Step does not currently have access to the equipment needed for Video Remote/Relay Interpreting, but can accept telephone calls from those individuals who in the absence of the device.
6. Captioning in Real Time (CART): The SPOC maintains a list of CART providers in Florida which is made available as needed. Employees will contact the SPOC if CART services are needed.

Translation Services:

1. Translation services are used when the person served/companion has limited English proficiency is not able to speak or understand English well enough to assure that the communication is effective.
2. If the individual indicates a language for which First Step has a translator on staff, the translator will be contacted and arrangements made for immediate translation services.
3. First Step maintains an account with **LANGUAGE LINE** which provides immediate translation services. All Program Directors and Supervisors have information available for Language Line which provides live telephone translation services.

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Privacy:

When an in-person translator or interpreter is used, the First Step staff must ensure that an Authorization to Release Information is obtained prior to sharing personal information.

Staff Training:

Within 60 days of starting employment with First Step and annually thereafter, all staff providing direct care services and those whose roles will likely place them in contact with persons with disabilities and limited English proficiency will receive training on the process for providing auxiliary aid services

The training utilized is the webinar series found on the DCF website. Completion certificates and attestation statements uploaded to the staff training system for record keeping.

If any staff member needs additional information or training regarding the requirements outlined in this procedure, or is not familiar with an auxiliary aid or service requested by a customer or companion, the SPOC or back up should be contacted for assistance.

Reporting Requirements:

The Single Point of Contact is responsible for reporting on a monthly basis the number and types of services provided to individuals who are deaf or hard of hearing (using the most current forms and time frames provided by DCF).

Each First Step Program is responsible for faxing the completed forms to the Single Point of Contact.

Plan Distribution:

Printed documents, including this Auxiliary Aid Plan, will be made available upon request, to individuals and other organizations providing services to persons with disabilities or limited English proficiency to assist in ensuring effective communication.

A copy of the Auxiliary aid Plan will be posted on the First Step website to be made available to the public for informational purposes for both individuals and organizations.

