

Developed: 12/17
Reviewed/Revised: 1/24

PROGRAM/MANUAL: Administrative Policies and Procedures

TITLE: Auxiliary Aid Plan/ Hard of Hearing Plan

POLICY: Silver Impact Inc. will provide Auxiliary Aids/Interpreter Services for clients and their companions who are deaf/hard-of-hearing and/or communicate in a language other than English at no-cost to the client.

PURPOSE: This policy is designed to ensure care with a through plan for those who are in need of assistance.

PROCEDURE:

1. Silver impact, Inc. will provide Auxiliary Aids/Interpreter Services for clients and their companions who are deaf/hard-of-hearing and/or communicate in a language other than English at no-cost to the client.
2. Children shall not serve as the primary interpreter for parents or other family members as clients/customers or as companions.
3. Silver impact, Inc. will not deny services to any client or companion who is deaf/hard-of hearing.
4. The Executive Director shall serve as the Single Point of Contact (SPOC) and the ADA Coordinator for Auxiliary Aid Service for the Deaf/hard-of-Hearing. The Administrative Assistant serves as the back-up SPOC.
5. All employees of Silver impact, Inc. are required to complete training in the Auxiliary Aid Plan compliance and shall execute a document which indicates their compliance with and the provision of Auxiliary Aid/Free Interpreter Service to Clients/Companions who are Deaf/Hard-Of-Hearing within the first 60 days of the 90-day provisional period of employment and annually thereafter.
6. Silver impact, Inc. shall retain a signed Attestation of the employees understanding of the ADA Compliance Laws and SPOC in their personnel record.
7. Silver impact, Inc. shall monitor employee compliance with the training requirement via the employee's yearly HHS training provided by the Department of Children and Families.
8. Silver impact, Inc. shall post in the common area, in a prominent place, accessible to everyone, the Florida Department of Children & Families posting of the following:
 - a. Interpreter Services for the Hearing Impaired
 - b. DCF Non-discrimination Policy
 - c. Services to Clients with Limited English Proficiency
9. All interpreter service vendors are required to submit evidence of certification/credentials of the qualified interpreters. Verification will be retained by the SPOC.
10. All agency groups, meetings, and conferences shall assure accessibility to clients/companions who have disabilities or require an auxiliary aid.
11. All postings, brochures, and advertising of services shall document the accessibility including the use of 711 Relay.

12. All staff use 711 Relay for telephone contact with clients who are deaf/hard-of-hearing.
13. Upon approval by the Executive Director, the Auxiliary Aid Plan shall be posted on the Agency website as required by DCF/HHS.
14. Upon request, the plan is made available in alternative forms and languages.
15. All clients and companions who are Deaf/Hard-of-Hearing shall be provided with an auxiliary aid at no cost and information on how to file and complete an Agency Grievance if needed.
16. At Screening/Enrollment, staff with first client contact will document in the record if the client or client companion is:
 - Deaf/hard-of-hearing
 - Communicates in a language other than English
 - Utilizes 711 Relay
 - a. Staff shall notify client/client companion/client referral source of the availability of no-cost interpreter services for primary languages and auxiliary aids for the deaf/hard-of-hearing.
 - b. Staff shall document the client/companion's preferred auxiliary aid service on initial application.
 - c. If the client/companion is deaf/hard-of-hearing and/or communicate in a language other than English, staff with first client contact by phone will:
 - i. Document in the client record a client alert message and:
 - a. Schedule HIS Deaf and Hearing Interpreting Service, Inc Sign-Language Interpreter, or;
 - b. Schedule/Use a LanguageLine® accessible phone, or;
 - c. Contact the approved Silver impact, Inc. Interpreter vendor directly.
 - d. HIS Deaf and Hearing Interpreting Service, Inc. In-person interpreters shall be the first option for deaf/hard-of-hearing persons.
 - e. Language Line® services shall be the first option for languages other than English.
 - f. Executive Director is available by agency cell phone if there are questions regarding the Assistive Listening device.
 - g. For urgent, same-day, in-person services, contact the vendor by telephone and follow-up with the electronic request.
 - h. For non-urgent, future/scheduled appointments the vendor can be scheduled electronically using the approved vendor request form.
 - i. Schedule the appointment upon confirmation from the vendor that the interpreter is available.
 - j. Copy the agency SPOC on:
 - i. All Interpreter Service Vendor Requests and confirmations
 - ii. All signed DCF Customer/Companion Waiver for Free Interpreter Service Forms.
 - k. In order to meet the contractual obligation with the vendor to provide 48 hours' notice of cancellations, confirm the appointment with the client 48 hours before the scheduled time.
 - i. Language Line® services do not require advance scheduling and cancellation.
 - l. Schedule the date and time of the service as a two-hour time block to allow extra time for interpreting.
 - m. Do not place clients requiring a live interpreter in the Open Access Intake Schedule.
 - n. Staff shall:
 - i. Confirm all appointments 2 days prior to the service.

- ii. Ensure that all scheduled interpreters are canceled with 48 hours' notice when a client appointment is canceled with notice.

17. During the first face-to-face contact, program staff shall:

- a. Complete the full DCF Customer/Companion Communication Assessment & Auxiliary Aid/Service Record form/screens in the client record.
- b. Complete and obtain client or companion signature on the DCF Customer/Companion Waiver for Free Interpreter Service or Auxiliary Aid.
- c. Schedule the date and time of future service as a two-hour time block to allow extra time for interpreting.
- d. Contact the approved Silver impact, Inc. interpreter vendor directly.
 - i. Language Line® services will be the first option for languages other than English.
 - ii. HIS Deaf and Hearing Interpreting Service, Inc In-person interpreters will be the first option for deaf/hard-of-hearing.
- e. Assistive Listening Devices shall be available at the front desk for immediate access if a need is assessed. Devices may be reserved with notice or signed out for immediate need.
- f. The Executive Director is available by agency cell phone if there are questions regarding the Assistive Listening device.
- g. For urgent, same-day, in-person services, assigned staff shall contact the vendor by telephone and follow-up with the electronic request.
- h. For non-urgent, future/scheduled appointments the vendor can be scheduled electronically using the approved vendor request form.
- i. Schedule the appointment upon confirmation from the vendor that the interpreter is available.
- j. Copy the agency SPOC on:
 - i. All Interpreter Service Vendor Requests and confirmations.
 - ii. All signed DCF Customer/Companion Waiver for Free Interpreter Service Forms.
- k. In order to meet the contractual obligation with the vendor to provide 48 hours' notice of cancellations, confirm the appointment with the client 48 hours before the scheduled time.
 - i. Language Line® services do not require advance scheduling and cancellation.
- l. When appointments are scheduled, the Executive Director or Administrative Assistant is authorized to contact the interpreter services approved and sub-contracted by Silver impact, Inc..

18. Walk-Ins:

- a. All efforts shall be made to provide interpreter services or Auxiliary Aid for clients who are Deaf/Hard-Of Hearing within 4 hours of walking into the Agency.
- b. Language Line® Interpreter Services will be used for clients who communicate in a language other than English.
- c. Silver impact, Inc. staff are required to contact the agency SPOC or the back-up in the event the staff is unfamiliar with the requested auxiliary aid or service or in the event a client presents for services and an auxiliary aid is not timely.
- d. No client is to be turned away due to lack of an auxiliary aid. The SPOC is required to make all efforts to obtain the appropriate auxiliary aid by contacting the DCF Single-Point of Contact documented in the completed training Attestation.
- e. Staff are to contact the SPOC immediately in the event that the auxiliary aid is not effective or in the event the auxiliary aid is denied.

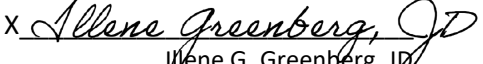
19. During the outbreaks such as COVID-19 Pandemic the deaf and hard-of-hearing will receive the same protection that others receive without cutting them off from visual communication. The use of masks may

be a barrier for some people with disabilities, particularly for people who are deaf or hard of hearing, because masks eliminate lip reading as an effective form of communication.

- a. According to the National Association of the Deaf (www.nad.org), it is estimated that as many as 20% of the population has experienced hearing loss. We also know that some people with other challenges, such as sensory issues, might find it difficult to wear a facemask.
 - b. In certain circumstances, the use of masks may not be reasonable, and accommodations can be made. Accommodations include safe alternatives such as social distancing. Acknowledgement, flexibility, and support for people with disabilities and special health needs is critical during the COVID -19 pandemic.
 - c. People who are deaf or hard of hearing may request others to remove their mask, if both parties are able to maintain a safe social distance of 6 feet.
 - d. Using a face shield (clear plastic shield that covers the forehead, extends below the chin, and wraps around the sides of the face) instead of a facemask protects the wearer and allows visibility of facial expressions and lip movements for speech perception.
 - e. Using speech-to-text apps, or writing notes on paper or mobile devices, may be effective.
 - f. Clear masks are an option. The Hearing, Speech and Deaf Center website has tips on making or purchasing clear masks. See: [How to Make An Accessible, Deaf-Friendly Face Mask](http://www.hsd.org/accessible-deaf-friendly-face-mask/) (www.hsd.org/accessible-deaf-friendly-face-mask/).
20. Clients/client companions shall be provided with a Customer Feedback form on the auxiliary/interpreter services after use of the auxiliary aid service to determine effectiveness and satisfaction with the service.
- a. Assistance in completing the form will be provided as requested by the client/client companion.
 - b. All completed forms are to be forwarded to the agency SPOC directly or via email to be retained in the file.
 - c. All customer feedback forms are retained by the client for mailing.
21. Requests for change of auxiliary services/interpreter service shall be accepted and provided as needed.
22. A copy of the completed Auxiliary Aid Assessment/Service Record must be maintained by the Agency SPOC via the electronic medical record of the client.
23. Clients who would like to file a grievance may contact the Silver impact, Inc. Compliance Officer at (954) 572-0444 or the resources listed below:

Department of Children and Families (DCF): Office of Civil Rights
1317 Winewood Boulevard, Building 1, Room 110
Tallahassee, FL 32399-0700
(850) 487-1901; or TDD (850) 922-9220; or Fax (850) 921-8470

United States Department of Health and Human Services (HHS)
Attention: Office for Civil Rights: Atlanta Federal Center, Suite 3B70
AUXILIARY AID PLAN AND PROCEDURES
61 Forsyth Street, SW
Atlanta, Georgia 30303-8909
(404) 562-7888; TDD/TTY (404) 331-2867; or Fax (404) 562-7881

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Executive Director