

# Jeff Industries, Inc.

## Deaf and Hard of Hearing Limited English Proficiency (LEP) And Auxiliary Aids Plan

FY 2019-2020

### Purpose

This document provides the guidance to meet the legal obligation of language access requirements in compliance with the Title VI of the Civil Rights Act of 1964 and for the Office for Civil Rights (OCR); 7 CFR, 273 et seq; and 42 CFR 435 et seq., as well as, the guideline to provide auxiliary aids that ensure the accessibility of all agency programs, services, and employment to persons with physical, mental, or emotional disabilities in compliance with Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990.

### Contact Personnel

Jeff Industries, Inc.  
Matthew Kwarchak  
Title VI Coordinator  
115 East Coast Avenue  
Hypoluxo, FL 33462  
(561) 547-9258 Ext 217

Department of Children and Families  
Office of Civil Rights  
1317 Winewood Blvd.  
Building 1, Room 110  
Tallahassee, Florida 32399-0700  
Voice: (850) 487-1901  
TDD: (850) 922-9220

Department of Children and Families  
Local Civil Rights Officer – Southeast Region  
Ms. Caroline Johnson  
111 South Sapodilla Avenue  
West Palm Beach, Florida 33401  
Voice: (561) 837-5538

U.S. Department of Health and Human Services  
Office of Civil Rights  
Atlanta Federal Center  
Suite 3B70  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303-8909  
Voice: (404) 562-7886  
TDD: (404) 331-2867

Florida Commission on Human Relations  
2009 Apalache Parkway, Suite 100  
Tallahassee, FL 32301-4857  
Voice: (850) 488-7082

Disability Rights Florida  
2473 Care Drive #200  
Tallahassee, FL 32308  
Voice: (800) 342-0823

## Plan Guidelines

All participants and program applicants are entitled to an equal opportunity to use and benefit from the programs, the facilities and services of Jeff Industries, Inc. It includes reasonable accommodations to ensure that all programs and services are equally accessible to and equally effective for otherwise qualified persons with disabilities who have hearing, vision and mobility impairments. Jeff Industries, Inc. will take reasonable steps to provide services and information in appropriate languages other than English in order to ensure that Limited-English Proficiency persons are effectively informed and can effectively participate in and benefit from its programs, services, and activities.

Auxiliary aids or language interpreters will be available for use by clients, potential clients, employees, and applicants with impaired sensory, manual or speaking skills in each phase of the service delivery or employment process (e.g. telephone inquiries, requests, intake interviews, employment interviews, terms and conditions of employment, service provision, counseling and complaints), when the lack of such aids may, in effect, deny service accessibility, hinder service effectiveness, or deny persons with disabilities or Limited-English Proficiency reasonable accommodations to ensure nondiscrimination and equal opportunity.

### Single Point of Contact – SPOC

The Single Point of Contact (SPOC), for Jeff Industries is Matt Kwarchak, Clinical Director. The SPOC will be responsible to ensure effective communication with deaf or hard-of-hearing persons and companions, as well as persons with Limited English proficiency.

All agency staff will complete the deaf or hard-of-hearing and civil rights training upon hire. Jeff Industries will ensure that all staff completes an annual refresher.

The SPOC will be responsible to update the auxiliary aids plan and the auxiliary aids monitoring plan annually.

### Auxiliary Aids Plan

Jeff Industries, Inc. will facilitate appropriate auxiliary aids to persons with impaired sensory, manual, or speaking skills, where necessary to afford such persons an equal opportunity to benefit from the services. The plan is available in different formats if requested.

An assessment of communications needs will be completed for all persons or companions who are deaf or hard-of-hearing using the Florida Department of Children and Families required documents. The assessment will be utilized to determine and facilitate needed Auxiliary Aids to meet the needs of Consumers or companions who are deaf or hard-of-hearing. The SPOC will obtain the auxiliary aids needed based on the communications and request for services assessment.

Jeff Industries will provide interpreters for persons and companions who are deaf or hard-of-hearing in accordance to the following guidelines:

#### **Requesting Auxiliary Aids for a consumer:**

For unscheduled non-emergency appointments – staff shall offer to provide an interpreter within 2 hours or at least by the next business day.

For unscheduled emergency appointments, staff shall provide an interpreter within the initial 2 hours. For non-emergency appointments, staff shall schedule an appointment for later and provide the interpreter. For scheduled appointment staff shall ensure an interpreter is present during the meeting. If the interpreter doesn't show up, staff shall facilitate other interpreter within 2 hours.

Staff shall document consumer and companions preferred method of communication. DCF required documents and forms completed will be filed in consumer's medical record. For those visiting the Drop-in center, forms will be maintained by SPOC.

In the event that communication is not effective or if the nature of the communication changes significantly after the initial communication assessment, Jeff Industries staff shall re-assess which appropriate auxiliary aids and services are necessary for effective communication. This shall be accomplished where possible in consultation with the person seeking the auxiliary aids or services.

Auxiliary aid services for deaf and hard of hearing will include on-site certified sign language interpreting, on-site captioning services, remote captioning services manual coded English, tactile interpreting, oral/speech reading English and foreign language interpreting services. A list of providers included in this plan. The provider will ensure verification of Interpreters certification.

In the in the event the agency determines Auxiliary Aids are not warranted, staff shall advise the person of the denial of the requested service and shall document the date and time of the denial, the name and title of the staff member who made the determination, and the basis for the determination. Jeff Industries staff shall provide the customer (and companion, if applicable) with a copy of the denial. Staff shall record the denial of the requested auxiliary aid or service on the Customer or Companion Communication Assessment and Auxiliary Aid/Service Record (form CF 761, available in DCF Forms). Staff shall also record the denial of requested service in the customer's case file or medical chart. Notwithstanding the denial, Jeff Industries staff shall nonetheless ensure effective communication with the Customer or Companion by providing an alternate aid or service which must be documented on the above form and in the customer's file. The agency will document the reason why on the Customer or Companion Communication Assessment and Auxiliary Aid/Service Record, discuss with the consumer and still ensure effective communication is provided to the consumer.

The agency will ensure that those persons that are referred to other agencies shall be informed of the preferred method of communication and any auxiliary aid needed with the consumers consent.

The Florida DCF Consumer/Companion Feedback form will be provided to the consumers or companions who are deaf or hard-of-hearing. Staff will assist them in completing the forms. Consumers will be informed to submit form to the Office of Civil Rights or if requested by the SPOC. This form shall not be kept in the consumer Medical Record.

All documentation related to services provided will be kept for 7 years.

The SPOC will ensure that notices which provide information about availability of auxiliary aids and services at no-cost to the deaf or hard-of-hearing, consumers or companions are posted near consumer/companion entrances. Posters shall include SPOC name and contact information as well as the FL DCF Regional Civil Rights Officer/ADA 504 Coordinator.

### **Limited English Proficiency (LEP)**

Jeff Industries, Inc. will provide language assistance on site to Limited English Proficiency clients

and their family members. Translators and interpreters can be arranged at the request of the client or family member. Once it has been determined that interpreter services are needed, the client and their family member will be informed that there is no charge or fee for the service. The agency will offer the service free of charge. Jeff Industries, Inc. will maintain a list of bi-lingual staff available as the primary means of language assistance. The agency will rely on Language Line Services, volunteer community interpreters, contracted interpreter services, or any other resources for all non-English languages will take place as necessary. Foreign Language interpretation may be accessed through Cyracon Language Solutions at [www.Cyracon.com](http://www.Cyracon.com) for video remote foreign language interpretation Use of family or friends as interpreters is not the preferred method of providing interpreter services. The agency will take into consideration the wishes of the client and their family to utilize friends and family members as interpreters. The clients and their families will be provided additional methods available to assure that they have been educated on all of their options. The staff member will also review the importance of confidentiality and assure the client's privacy rights will be protected by the family member or friend. The staff person will need to document in the case file the extenuating circumstances for use of family or friends, particularly that the family was offered other interpreter services and that the client insisted that a family member or friend be used.

In order to serve clients with limited capability to speak English, the agency has available several staff members who speak Spanish or creole, the predominant languages other than English in this area.

When a client is scheduled for an intake or in the event the worker is assigned to a department considerations will be made to accommodate the language spoken by the worker and the staff available. Staff will be made available in order to meet the workers needs.

<u>Staff Member</u>	<u>Language</u>	<u>Program/Department</u>
1. Karla Ortega	Spanish	Consumer Services Facilitator
2. Claudia Roberts	Spanish	Executive Director
3. Mariano Cassini	Spanish	Vocational Instructor/Job Coach

#### **List of Auxiliary Aid Resources**

Florida Relay (711)

Alternative toll free numbers for 711:

TTY	800-955-8771 for TTY equipment
Voice	800-955-8770 for voice trying to connect with Relay user
ASCII	800-955-1339 for computer user

Speech to Speech (STS) 877-955-5334 for persons with speech disability  
Video Assisted STS 877-955-5334 for call user to understand STS user's speech  
Spanish to Spanish 877-955-8773 for Spanish conversations  
Spanish to English 877-463-9710 for SPA person to communicate with ENG caller  
French to French 877-955-8707 for French language  
900 Pay Per Call 900-230-6868 for Pay per call – Relay bills – Rates vary

Language Line 800-752-6069 to set up a pay as you need service  
[http://www.language.com/solutions/interpretations/  
personal-interpreter](http://www.language.com/solutions/interpretations/personal-interpreter)

CART Captioning Real Time Resources for deaf or hard-of-hearing that don't use sign language or for whom assistive listening devices and systems are ineffective.

Caption Crew  
Florida Realtime Reporting Services 800-767-0450  
110 E Broward Blvd #1850, Ft Lauderdale, FL 33301

Glenda M. Powesr, CRR, RPR, FPR 954-829-1758  
Powers certified Realtime, Inc.  
13050 SW 6<sup>th</sup> Court  
Davie, FL 33325

### Implementation

All agency staff will complete the deaf or hard-of-hearing and civil rights training upon hire. A copy of this plan will be provided to all staff. On annual basis, all staff members will complete the Deaf and hard-of-hearing training, the Civil Rights refresher training and review the Deaf and Hard-of-hearing, Limited English Proficiency and Auxiliary Aids Plan. Staff will be trained on the use of any Auxiliary Aids equipment available at the agency. Documentation of staff training is maintained in their HR files. Staff sign the Support of to the Deaf and Hard-of-Hearing Attestation Form

The review will also provide training on client rights guaranteed by applicable State and Federal Statutes including Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990.

Clients and applicable family members will be informed of their rights, the availability of auxiliary Aids and interpretive services, and grievance procedures. On at least an annual basis, clients and applicable family members will be informed of their rights, the availability of Auxiliary Aids and interpretive services, and grievance procedures. They will also be informed of their right to request


additional accommodations throughout the year if they feel they do not have equal access to programs due to their disability or Limited English Proficiency. Clients and applicable family members will be given the opportunity to ask questions and will sign an information page verifying that they have received ongoing training concerning these rights.

Jeff Industries shall ensure accessibility to meetings, conferences and seminars to persons with disabilities, limited English proficiency, and those who are deaf or hard-of-hearing. Jeff Industries will notify the public by placing the notices and advertisement prior to the event.

Jeff Industries will submit monthly HHS Report, no later than the 5<sup>th</sup> of each month, for the previous month. Report will submitted to the DCF Regional Civil Rights Officer/ADA Coordinator and the SEFBHN Contract Manager.

Posters will be displayed in prominent locations throughout the agency listing the name and contact information of Jeff Industries' Title VI Coordinator and the contact information for the Department of Children and Families and the U.S. Department of Health and Human Services Office of Civil Rights.

Approved by:

  
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Claudia Roberts, Executive Director

3/2/20  
Date

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