



Auxiliary Aid Services & Accessibility Plan

For Persons with Disabilities and
Limited English Proficiency

2023-2024

Fellowship Recovery Community
Organization

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Non-Discrimination Statement

Non-Discrimination Policy

No person shall, on the basis of race, color, religion, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of, or be subjected to unlawful discrimination under any program or activity owned or operated by Fellowship Recovery Community Organization (FRCO).

FRCO will make reasonable accommodations for qualified individuals with reported disabilities unless doing so would result in an undue hardship. Any FRCO staff found to be engaging in unlawful discrimination will be subject to disciplinary action, including termination of employment.

Equal Employment Opportunity (EEO) Policy

In order to provide equal employment and advancement opportunities to all individuals FRCO does not discriminate in employment opportunities or practices because of race, color, religion, sex, sexual orientation, gender identification, national origin, age, political opinions or affiliations, marital status or disability except when such requirement constitutes a bona-fide occupational qualification necessary to perform the tasks associated with the position. This policy governs all aspects of employment, including selection, job assignment, promotion, compensation, retention, discipline, termination, and access and training.

It is also the purpose of this policy to recruit, promote and support a culturally and linguistically diverse governance, leadership and workforce that are responsive to the population in the service area. Employees with questions or concerns about discrimination in the workplace are encouraged to bring these issues to the attention of their supervisor. Employees can raise concerns and make reports without fear of reprisal.

Non-Retaliation Policy

No person shall be retaliated against, harassed, intimidated, threatened, coerced or discriminated against for making a charge, testifying, assisting or participating in any manner in an investigation, proceeding, or hearing; or for opposing alleged unlawful discriminatory practices prohibited by state and federal laws.

Any persons served or employee who believes that he or she has been discriminated against may file a complaint with the Florida Commission on Human Relations or the Department's Office of Civil Rights, within 365 days of the alleged discriminatory act. All complaints shall be treated in accordance with the procedures set forth by law or in Chapter 60Y-5, Florida Administrative Code (F.A.C.). Employees can raise concerns and make reports without fear of reprisal.

Purpose

The purpose of the Auxiliary Aid Services & Accessibility Plan is to ensure Fellowship Recovery Community Organization (FRCO) is in compliance with Title II of the Americans with Disabilities Act (ADA); Section 504, Title V of the Rehabilitation Act of 1993; and the DCF Operating Procedures. FRCO shall continually assess the accessibility needs of persons served, personnel and stakeholders. FRCO is committed to identifying barriers for accessing care including architecture, environment, attitudes, finances, employment, communication, technology, transportation, community integration and other areas as identified by participants, personnel and community stakeholders.

FRCO will provide effective, equitable, understandable, and respectful quality care and services that are responsive to diverse cultural health beliefs and practices, preferred languages, health literacy and other communication needs.

Scope

The provisions described in this plan apply to all programs, staff, interns, volunteers and contracted providers who provide direct services or have direct contact with participants. It is the responsibility of the organizations Single Point of Contact (SPOC) to ensure the development, implementation, revision and oversight of this plan.

References

The plan and any associated policies are derived from the following:

- A. Title VI of the Civil Rights Act of 1964, as amended, 42 United States Code (USC) 2000d et seq; 45 Code of Federal Regulations (C.F.R.), Part 80.
- B. Section 504, Title V of the Rehabilitation Act of 1973, as amended, 230 USC 1681 et seq; 45 C.F.R., Part 80, 84 and 28 C.F.R. Part 41 of the Civil Rights Restoration Act of 1987.
- C. Section 508 of the Rehabilitation Act of 1973, as amended.
- D. The Omnibus Budget Reconciliation Act of 1981, as amended, 42 USC 9849 and Civil Rights Restoration Act of 1987, Public Law 100-259.
- E. The Americans with Disabilities Act of 1990, Title I and II, as amended.
- F. CFOP 60-16, Civil Rights, Methods of Administration: Equal Opportunity in Service Delivery.
- G. CFOP 60-10, Americans with Disabilities Act (ADA) Accommodation Procedures for Applicants/Employees/General Public.
- H. U.S. Department of Health and Human Services (HHS), Office of Civil Rights (OCR), Policy Guidance – Title VI Prohibition Against National Origin Discrimination As It Affects Persons with Limited-English Proficiency, Executive Order 13166.
- I. Section 110.201(3), Florida Statutes (F.S.), requires each state agency to comply with all federal regulations necessary to receive federal funds.

Persons with Disabilities

In accordance with federal law and the Florida Department of Children and Families FRCO shall furnish appropriate auxiliary aids and services where necessary to ensure effective communication with individuals with disabilities. Such auxiliary aids and services may include: qualified sign language or oral interpreters, note takers, computer-assisted real time transcription services, written materials, telephone handset amplifiers, assistive listening devices, assistive listening systems, telephones compatible with hearing aids, closed caption decoders, open and closed captioning, videotext displays, and TTYs. All auxiliary aids and interpretation services that are needed at things such as meetings, conferences and seminars will be provided upon request by any person in attendance, including staff and participants.

Staff, students, volunteers, and contracted providers shall document any provision of accommodation provided in the participant's record, when provided for the person served, and separately for persons other than the person served in an effort to provide data to the Continuous Quality Improvement Committee on utilization and trends.

Persons who are Deaf or Hard of Hearing

Staff shall provide interpreters for customers and companions who are Deaf or Hard of Hearing in a timely manner. Sign language interpreters must be certified. The use of assistive devices (vibratory alarms) will be incorporated with relevant services (tactile communication) for persons with multiple disabilities such as deafness and blindness. If the individual declines the use of the sign language interpreter, or other auxiliary aids, the client's file must be noted, utilizing the Customer or Companion Communication Assessment and Auxiliary Aid and Service Record. FRCO staff will ever use family members, children, friends and untrained volunteers as interpreters because it is difficult to ensure that they interpret accurately and have no ethical conflicts.

Persons looking to engage with FRCO will be asked about his/her/their preferred method of communication. Staff shall accomplish this by first completing the Customer Companion Communication Assessment Form. The communication options for persons who are Deaf and Hard of Hearing may include but not limited to the CART, Florida Relay Service, VRS, VRI, TDDs (Telecommunication Devices for the Deaf), FAX (Telephone Facsimile Transmittal), phone amplifiers, qualified or certified sign language interpreters, flash cards, lip-reading, written notes, supplementary hearing devices, charts, signs or a combination of these, as appropriate. If an interpreter is needed, staff shall contact a certified interpreter from their listing of interpreter services. The use of auxiliary aids, certified sign language interpreters, or translators will be at no cost to the customer or companion. Documentation on Customer Companion Communication Assessment form shall be recorded and placed in the participant's record.

Scheduled Appointments

For scheduled appointment, the FRCO will have a certified interpreter at the time of the scheduled appointment. If the interpreter fails to appear, staff will notify the organization's Single Point of Contact (SPOC) so that she may take whatever additional actions are necessary to make a certified interpreter available to the customer or companion as soon as possible, but no later than two (2) hours after the scheduled appointment, or as convenient to the customer or companion.

Non-Scheduled Appointments

For a non-scheduled appointment or non-emergency situation, the FRCO will provide a certified interpreter within two (2) hours of the request, or at least by the next business day. In emergency situations an interpreter shall be made available as soon as possible, but no later than two (2) hours from the time the customer or companion requests an interpreter, whichever is earlier.

FRCO staff shall continue to try to communicate with the customer or companion who is Deaf or Hard of Hearing insofar as the customer or companion seeks to communicate, between the time an interpreter is requested and the time an interpreter arrives.

Ineffective Communication

Should a staff find the interpretation services to be ineffective with a participant or if a participant communicates the services are ineffective, the staff shall revert to utilizing simple notes to communicate with the participant. Information should be ongoingly communicated with the participant, to the best of staff's ability, as they work to schedule new accommodations. The staff will need to contact an alternative form of aid and see if it is available within the same day or if a new scheduled appointment can be made. Should same day services be available the staff should ensure the participant is willing to wait for same date services.

Persons with Low Vision or Blind

It is important that staff determine the best method of communication for persons who have low vision or blind. While Braille may be offered as an alternative, always communicate with the customer to determine the best method of providing services to them in an equitable and effective manner. Staff shall document type of auxiliary aid and service provided during contact with the individual within the participant's record.

Persons who have Mobility Limitations

FRCO locations will have parking spaces clearly marked which are adjacent to the building or in close proximity. Additionally, all facilities will have entrance ramps to ensure access for persons with disabilities (36" wide or wider, level with adjacent surface and a manageable slope or incline of no more than one inch rise per foot, 1:12). Meeting rooms will be all on one level or capable of being reached by elevators or ramps that can be independently traversed by a participant with mobility limitations. The FRCO will ensure seating arrangements for persons in wheelchairs will be adapted to integrate persons who are mobility limited rather than to isolate them on the group's perimeter. Each facility will have audible and visible fire alarms.

Persons with Limited English Proficiency (LEP)

Language interpreters will be available for use by clients and potential clients in each phase of the service delivery process (e.g., telephone inquiries, requests, intake interviews, service delivery, counseling, complaints, testing, treatment, and training, etc.) This service will be at no cost to the client. FRCO employs Spanish speaking individuals and utilizes Language Speak for interpretation services for other languages. Material that is interpreted in other languages is done through the assistance of the TA

network. FRCO and its provider network of services will make reasonable modifications and accommodations available at no cost to a qualified persons or their companion, when appropriate, to include the provision of auxiliary aids and services necessary to afford an equal opportunity to participate in or obtain benefit from programs, services, and activities. Understanding that a modification or accommodation may not be requested by a qualified person, FRCO staff will assess for and offer reasonable accommodations to include necessary auxiliary aids, should staff determine that the current method of communications with the qualified person is not effective due to a disability or LEP. Training updates are provided to the staff quarterly at staff meetings as it relates to language assistance services.

FRCO utilizes Language Speak, when necessary, which is a comprehensive language company that is committed to excellence in all facets of language services. Language Speak uses professional credentials and references from all translators. All language professionals (translators, interpreters, and instructors) are native speakers, certified, and have a broad range of expertise and experience. Reasonable accommodations may include, but are not limited to, the provision of Braille documents, qualified interpreters, qualified readers, and other assistive devices and will be provided, upon request. Reasonable steps will be made to provide information and interpretive services in languages other than English. Schedule service will be provided within 2 hours and non-scheduled services will receive an interpreter within a business day.

Service Animals

FRCO defines Service Animal as any species of animals that are individually trained to do work or perform tasks for people with disabilities.

It is policy that persons with disabilities will not be discriminated against and that they will have full and equal access, services, and treatment. All person served and visitors accompanied by a service animal that is individually trained to do work or perform tasks for a disabled person must be permitted to enter all areas of the FRCO open to the general public. Staff shall use **minimal inquiry** when the work, service or tasks performed by the service animal are not obvious and apparent.

Service animals **recognize and respond** to needs. Examples include, but are not limited to:

- Guiding vision impaired
- Alerting hearing impaired
- Pulling wheelchair
- Retrieving items
- Stability and ambulation
- Alerting or protecting person having seizure
- Reminding person to take medication
- Calming person with Post-Traumatic Stress Disorder during an anxiety attack
- Preventing or interrupting impulsive or destructive behavior
- Removing disoriented individuals from dangerous situations

In accordance with ADA Requirements for Service Animals, when it is not obvious what service an animal provides, only limited inquiries are allowed.

FRCO staff may ask two questions:

- 1) is the dog a service animal required because of a disability, and

2) what work or task has the dog been trained to perform.

Staff cannot ask about the person's disability, require medical documentation, require a special identification card or training documentation for the dog, or ask that the dog demonstrate its ability to perform the work or task.

Allergies and fear of dogs are not valid reasons for denying access or refusing service to people using service animals. When a person who is allergic to dog dander and a person who uses a service animal must spend time in the same room or facility, for example, in a school classroom or at a homeless shelter, they both should be accommodated by assigning them, if possible, to different locations within the room or different rooms in the facility.

A person with a disability cannot be asked to remove his service animal from the premises unless:

- 1) Not housebroken, poor hygiene, dog is ill
- 2) The animal poses a direct threat to the health or safety of patients, staff and/or other visitors that cannot be eliminated by a reasonable modification of policies, practices, or procedures of the provision of auxiliary services;
- 3) Animal fundamentally alters the nature of the goods, services, facilities, privileges, advantages, or accommodations FRCO provides to the public;
- 4) Animal is out of control and handler does not take effective action to control it;
- 5) Disruption (Barking, Running, Jumping);
- 6) Aggressive behavior (biting, lunging);

When there is a legitimate reason to ask that a service animal be removed, staff must offer the person with the disability the opportunity to obtain goods or services without the animal's presence.

Staff must not:

- Treat individuals and visitors with service animals less favorably;
- Pet the service animal (May distract from assigned tasks);
- Feed, clean, toilet or care for the service animal;
- Ask individual, visitor, or handler to remove service animal from premises, *unless* an individualized assessment of direct threat has been completed.

Requirements for Service Animals — Service animals must be under the handler's control at all times via at least one of the following:

- Harness
- Leash
- Tether
- Voice control
- Motion / signal control
- Other effective controls
- **Exception** — The devices listed above need not be used if they:
 - Interfere with the service animal's work; or
 - Person's disability prevents using these devices

Denial of Accommodations

If FRCO staff determines that the communication situation is not Aid Essential and does not warrant provision of the auxiliary aid or service requested by the participant or companion, the 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. Staff shall provide the customer (and companion, if applicable) with a copy of the denial. Staff shall additionally 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) which will be placed in the participants record or turned into the FRCO's SPOC if it was for a companion. The staff will still 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 participant's record. Denial determinations can only be made by the Chief Operating Officer or Chief Executive Officer (or designee) Staff who are unfamiliar with the auxiliary aid or service requested shall contact the 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 clients, customers and companions.

Staff Training

All new staff will be required to completed training related to auxiliary aids and services for persons with disabilities and limited English proficiency, within 60 days of starting employment and annually thereafter. Any updates or changes that are made between that time will be communicated to the staff at least quarterly at staff meetings.

Annual Evaluation, Review & Approval

The Single Point of Contact (SPOC) in collaboration with the CQI Committee develops the annual Auxiliary Aid Services & Accessibility Plan. The CQI Committee reviews the annual Auxiliary Aid Services & Accessibility Plan and provides feedback, to include recommended updates or revisions to the plan. The Auxiliary Aid Services & Accessibility Plan is updated in accordance to the review and evaluation on an annual basis and then updated and approved by the Board of Directors.

Annual Review & Approval

Name & Title (Print)

Signature & Title

Date

Name & Title (Print)

Signature & Title

Date

Name & Title (Print)

Signature & Title

Date

Appendix A: Certified Interpreters

Certified Foreign language interpreters		
Name	Phone #	Email
Access Interpreting Services, LLC	813-321-0427	accessinterpreting@outlook.com
Jessica Harris Interpreting Services, Inc.	727-271-0160	JHarris@JHinterpretingservices.com
VisCom	941-363-1318	Interpreter@VisComOffice.com

Certified Sign language interpreters		
Name	Phone #	Email
Refugee Health Program	850-901-6521	accessinterpreting@outlook.com
Juan Carlos Huerta Hidalgo	305-783-1743	mrjhidalgo@gmail.com
Sydney Kaiserman	831-917-8306	Sydney.kaiserman@gmail.com