

**Archways**  
**AUXILIARY AIDS PLAN FOR PERSONS WITH DISABILITIES**  
**AND LIMITED-ENGLISH PROFICIENCY PLAN**

**Purpose.** This plan provides the Southeast Region with guidelines for the provision of auxiliary aids ensuring accessibility to all programs, benefits, and services to persons with disabilities and foreign-language interpreters for persons with Limited-English Proficiency (LEP).

**Scope.** The provisions described in this procedure apply to all Department programs and contract providers such as Archways, who provide direct services to customers or potential customers and applicants.

**Policy.** The Department and its contracted providers of customer services will provide appropriate auxiliary aids, including qualified/certified 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 the Department of Children and Families programs, and services. Auxiliary aids include, but are not limited to, Braille and taped materials, qualified interpreters, readers, assistive listening devices and systems, television decoders, visual fire alarms using strobe lights, captioned films and other assistive devices.

All qualified and potential customers are entitled to an equal opportunity to use and benefit from the programs and services of the Department and its contracted service providers. This includes reasonable accommodation to ensure that programs and services are equally accessible to and equally effective for otherwise qualified persons with disabilities who have hearing, vision or mobility impairments. The Department and its contracted service providers will take reasonable steps to provide services and information in appropriate languages, other than English, to ensure that Limited-English Proficient 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 customers and potential customers 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, etc.).

**References.**

Title VI of the Civil Rights Act of 1964, as amended, 42 United States Code (USC) 2000d et seq; 45 Code of Federal Regulations (CFR), Part 80. Section 504, Title V of the Rehabilitation Act of 1973, as amended, 230 USC 1681 et seq; 45 CFR, Part 80, 84 and 28 CFR Part 41 of the Civil Rights Restoration Act of 1987.

Section 508 of the Rehabilitation Act of 1973, as amended.

The Omnibus Budget Reconciliation Act of 1981, as amended, 42 USC 9849 and Civil Rights Restoration Act of 1987, Public Law 100-259.

The Americans with Disabilities Act of 1990, Title I and II as amended.

CFOP 60-16, Civil Rights, Methods of Administration: Equal Opportunity in Service Delivery.

CFOP 60-10, American with Disabilities Act (ADA) Accommodation Procedures for Applicants/Employees/General Public.

Department of Health and Human Services, Office of Civil Rights, Policy Guidance – Title VI Prohibition Against National Origin Discrimination as It Affects Persons with Limited-English Proficiency.

Section 110.201(3), Florida Statutes, requires each state agency to comply with all federal regulations necessary to receive federal funds.

**Definitions.**

**ADA.** The Americans with Disabilities Act of 1990 (ADA) provides civil rights protections to individuals with disabilities like those provided to individuals on the basis of race, color, sex, national origin, age, and religion. The ADA guarantees equal opportunity for individuals with disabilities in public accommodations, employment, transportation, State and local government services, and telecommunications.

**Applicant for Services.** A person seeking services from the Department but not yet determined eligible for a program or service.

**Assistive Listening Devices and Systems (ALDS).** This is amplification systems to improve hearing ability in large areas and in interpersonal communications systems. These systems deliver the desired signal directly to the ears or hearing aids of the listener, thus overcoming the negative effects of noise, distance and echo. Four main types are available: hardwire, loop, infrared, and FM.

**Auxiliary Aids and Services.** The wide range of services (e.g., sign language interpreters, captioning, Braille, note taking) and devices (e.g. assistive listening systems, page magnifiers, TTYs/TDDs, voice output computer hardware/software, communication boards, speech synthesizers) used to ensure equal access to services and benefits.

**Blind.** See Visual Impairment.

**Captioning (Closed).** This refers to converting the spoken word to text displayed in the visual media (videos, television, etc.) in a way that it is available only to individuals whose televisions are equipped with captioning decoders.

**Captioning (Open).** Refers to converting the spoken work to text displayed in the visual media (videos, television, etc.) so that it is seen by everyone who watches the film (i.e., it cannot be turned off).

**Captioning (Real Time).** This is when 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 with hearing impairments that do not use sign language or for whom assistive listening devices and systems are ineffective.

**Communication Disabilities.** A comprehensive term which includes hearing impairment, speech impairment (for aural, oral communication), visual impairment, or other disabilities that present an impairment to reading (for written, visual communication).

**Deaf.** A term used to describe a person having a permanent hearing impairment and being unable to discriminate speech sounds in verbal communication, with or without the assistance of amplification devices.

**Disability.** A condition that substantially limits a major life activity, such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, lifting, sleeping, and working.

**Dual Sensory Impairment.** A term used to describe a person having both a visual impairment and a hearing impairment. The term includes all ranges of loss, which would necessitate the use of auxiliary aids and services for communication.

**Florida Relay Service.** The Florida Relay Service is a service offered to all persons in the state which enables a hearing person to communicate with a person who is hearing or speech impaired and must use a TDD/TTY, through a specially trained operator called a communications assistant.

**Food and Nutrition Services.** Food and Nutrition Services increases food security and reduces hunger in partnership with cooperating organizations by providing children and low-income people access to food, a healthful diet, and nutrition education in a manner that supports American agriculture and inspires public confidence.

**Hard of Hearing.** A term used to describe a person having a permanent hearing impairment, which is severe enough to necessitate the use of auxiliary aids or services to discriminate speech sounds in verbal communication.

**Health and Human Services.** The Department of Health and Human Services, through the U.S. Office of Civil Rights, promotes and ensures that people have equal access to and opportunity to participate in and receive services in all Health and Human Services programs without facing unlawful discrimination.

**Health Insurance Portability and Accountability Act (HIPAA).** This Federal law protects individual's medical records and other personal health information.

**Hearing Impairment.** This is an all-inclusive term to describe any hearing loss. A person with a hearing impairment could be either deaf or hard of hearing.

**Interpreter.** An individual who is qualified to convert one spoken language into another—or, in the case of sign-language interpreters, between spoken communication and sign language.

**Manual Disability Impairment.** A term used to describe a condition which limits or prevents the use of a person's upper extremities (arms, hands).

**Mental Disability Impairment.** The Americans with Disabilities Act (ADA) defines this term to include mental or psychological disorders such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

**Mobility Impairment.** For the purpose of this procedure, this term is used to describe a condition that substantially limits a person's upper or lower body mobility. It includes those persons who have limited use of arms, shoulders; persons who are in wheelchairs or on crutches; people of short stature; those who cannot perform certain hand movements or have difficulty controlling movement; and people with breathing difficulties or stamina limitations. It also includes person with visual impairments.

**Physical Disability.** This is a broad term, which includes physiological disorders or conditions, cosmetic disfigurement and anatomical loss. It includes orthopedic, visual, speech, and hearing impairments, cerebral palsy, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, HIV disease (symptomatic or asymptomatic), tuberculosis, drug addiction and alcoholism.

**Print Impairment.** An organic condition or disability that leads to an inability to use traditional printed material (10-12 point print). This term includes persons with visual impairments, physical disabilities that results in an

inability to hold or turn pages of a book (e.g., arthritis, cerebral palsy, muscular dystrophy, multiple sclerosis, stroke, paralysis, amputation), and learning disabilities (e.g., dyslexia).

**Program accessibility.** An American with Disabilities Act (ADA) standard, which means a public entity's programs, services, or activities, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities. The concept of program accessibility is intended to make the contents of the program, service or activity equally available and accessible to persons with disabilities without excessive renovations of facilities. [See also: "Undue Burden".]

**Qualified Interpreter.** The Americans with Disabilities Act defines qualified interpreter as a person who is able to interpret effectively, accurately, and impartially both receptively (i.e., can understand what both persons in the conversation are signing and saying) and expressively (i.e., can then sign or say to the other person what it is being said or signed), using any necessary specialized vocabulary.

**Sensory Impairment.** This is a general term, which is used to describe impairment of vision or hearing. For the purpose of this document, it also includes impairment of speech.

**Translator.** Individuals qualified to convert written materials from one language into another.

**TTD/TTY/TT.** Terms used to designate a text telephone, a typewriter-like device used to transmit conversations across telephone lines. In this document, this device will be referred to as a TDD/TTY.

**Undue Burden.** This term, used in conjunction with programs and services (ADA Title II), means an unreasonably excessive financial cost or administrative inconvenience in making alterations to building or facilities in which programs, services or activities are conducted, in order to ensure equal benefit to persons with disabilities.

NOTE: Program access requirements of ADA Title II should enable individuals with disabilities to participate in and benefit from the programs, services and activities of public entities in all but the most unusual cases. Determination of undue burden can be made only by the agency head or his/her designee, after considering all resources available for use in the funding and operation of the program.

**Visual Impairment.** A generic term used to describe any loss of vision.

### **Accountability.**

The Region Director and Circuit Administrator are responsible for the implementation of the Auxiliary Aids and Limited English Proficiency Plan. Local resources have been appended to this Plan. This Plan and training of the Plan must be provided to all staff to ensure they have the necessary tools for the provision of assistive devices, qualified sign language interpreters or readers and physical modifications to ensure the accessibility of programs and services to clients or potential clients with sensory (hearing and sight), speaking or mobility impairments as well as foreign-language interpreters to customers or potential customers with limited-English proficiency. The Assistant Staff Director, Office of Civil Rights is the designated Title VI, Title II ADA and Section 504 Coordinator for the Department. The Assistant Staff Director is responsible for the coordination, development and implementation of Departmental procedures ensuring the nondiscriminatory delivery of equally effective and equally accessible quality services. All Departmental and contracted providers' employees are responsible for ensuring equal accessibility and equally beneficial services to all customers and potential customers of the Department.

The local Civil Rights Officer is the designated Title VI, Title II ADA and Section 504 Coordinator for the Southeast Region. Archways Executive Director/CEO or designee is the agency's Title VI, Title II ADA and Section 504 Coordinator.

**Dissemination.** Copies of regional/circuit plans and/or headquarter plans are kept by the Office of Civil Rights. Copies are distributed upon request to individuals or organizations serving persons with disabilities or Limited-English Proficient. Copies in alternative format will be provided upon request.

**Revisions.** The Auxiliary Aids Plan and Limited-English Proficiency Plan will be updated as needed, but at least annually, with a copy of all changes submitted to the Office of Civil Rights by March 31 of each year.

**Ensuring Accessibility.** The following procedures are to be followed by employees and contracted services providers to ensure accessibility of programs and services to customers or potential customers with disabilities or Limited-English Proficiency:

Assess customer needs by consulting with the customer or potential customer concerning his or her preferred communication mode, and if applicable with assigned caseworkers, counselors, parents, family members, guardians or other representatives.

For customers with hearing impairment/deafness, staff is required to determine, prior to providing services, the method of communication that the customer feels most comfortable with and record this information in the customer's file.

For customers who are limited English proficient (LEP), staff shall identify at first contact, the preferred language including dialect of each customer, and record this information in the customer's file.

The communication options for hearing impaired persons may include but not be limited to the Florida Relay Service, TDDs (Telecommunication Devices for the Deaf), FAX (Telephone Facsimile Transmittal), phone amplifiers, qualified/certified sign language interpreters, flash cards, lip-reading, written notes, supplementary hearing devices, charts, signs or a combination of these, as appropriate.

The Departmental or contract provider's official (or designate) with budget approval over the unit or facility has the responsibility for approving the request and obtaining the appropriate auxiliary aid or interpreter.

Auxiliary aids or interpreters will be provided within five days of request or as otherwise required. Delaying services is not always practical or appropriate; therefore, provision will be made when advance notice for an auxiliary aid or interpreter is not given. **Customer files will be documented to indicate if an auxiliary aid or interpreter is needed, and subsequent referrals will be notified in advance of customer's needs.**

**The use of auxiliary aids, qualified sign-language interpreters, translators, or foreign-language interpreters will be at no cost to the customer or applicant for services.** Auxiliary aids or interpreter services will normally be obtained within the Department or provider's current resources, including the use of certified/qualified staff, volunteers and volunteer organizations. However, if an auxiliary aid or an interpreter is required and services must be purchased, payment will be made from the appropriate program operating budget.

(1) Language services include, as a first preference, the availability of qualified bilingual staff that can communicate directly with customers in their preferred language (see 3-17).

(2) When bilingual staff is not available, the next preference is face-to-face interpretation provided by qualified contract or volunteer language interpreter.

(3) Telephone interpreter services should be used as a supplemental system when an interpreter is not available, or when services are needed for an unusual or infrequently encountered language.

(4) Sign language interpreters must be certified or at minimum, "qualified".

Minor children should never be used as interpreters or be allowed to interpret for a parent.

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 free foreign language or sign language interpreter, or other auxiliary aids, the customer's files must be noted and the declination documented. **(See Appendix B)**

**Identifying language trends.** To ensure meaningful access to all Department programs and services, each program office and contracted provider will identify language trends by:

Identifying the non-English languages that are likely to be encountered in its programs and estimating the numbers of LEP persons eligible for services that are likely to be affected by its program. This can be done by reviewing census data, client utilization data, and community organizations. The estimate should be used as a guide for employee recruitment.

(1) Informing customers of the purpose for collecting data on race, ethnicity and language,

(2) Emphasizing that such data is confidential and will not be used for discriminatory purposes,

(3) A customer does not have to provide the information if he or she chooses not to provide such information, unless required by law,

Identifying the points of contact in the program or activity where language assistance is likely to be needed; and identifying resources needed, location and availability of these resources.

Reporting the identified language needs to the Office of Civil Rights or the local Civil Rights Officer.

**Meetings/Conferences/Facilities Accessibility.** The following are procedures and minimum requirements for ensuring accessibility of meetings, conferences and seminars to persons with sensory, speech or mobility impairments or Limited-English Proficient:

Facilities used for meetings, conferences and seminars will be reviewed for accessibility by the unit sponsoring the activity in coordination with the designated Section 504/Title II ADA Coordinator.

**When meetings, conferences and seminars are scheduled, information will be included in the advertisements, conference registration materials or meeting notices that sensory impaired or limited-English proficient participants will be provided with necessary auxiliary aids or interpreters at no cost**

**to themselves.** The information will include the name of a contact person and a date by which the person must request such assistance. The registration process will include a method for determining the number and type of persons with disabilities or limited-English proficient needing assistance as well as the type of personal assistance or accommodation requested.

The following provisions are required if sensory, speech, mobility impaired or limited-English proficient persons plan to attend the specific meeting, conference or seminar:

- (1) Qualified interpreters for hearing or speech impaired persons and accessibility to Teletype (TDD) equipment. NOTE: When telephones are provided for use by participants or residents (customers, employees or the public), TDDs must be provided for participants or residents who are deaf.
- (2) Adequate lighting in meeting rooms so signing by interpreter can be readily seen.
- (3) Readers or cassette recordings to enable full participation by vision impaired persons.
- (4) Interpreters for limited-English proficient persons.
- (5) Agenda and other conference materials translated into usable form for visually and hearing impaired or limited-English proficient participants.
- (6) Parking spaces clearly marked with appropriate ramps and curb cuts will be provided for persons with disabilities.
- (7) Where parking is available on or adjacent to the site, one 96" wide space with a 60" access aisle shall be set aside for the car of each mobility-impaired participant requesting it in advance of the meeting. Two accessible parking spaces may share a common access aisle.
- (8) Where parking is not available on or adjacent to the site, valet parking or other alternative accommodations for mobility impaired participants will be provided.
- (9) Entrance ramps will be available and appropriate (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).
- (10) Meeting rooms will be all on one level or capable of being reached by elevators or ramps that can be independently traversed by a mobility-impaired participant.
- (11) Stages, platforms, etc., to be used by persons in wheelchairs will be accessible by ramps or lifts.
- (12) Seating arrangements for persons in wheelchairs will be adapted to integrate mobility-impaired persons rather than to isolate them on the group's perimeter.
- (13) Sufficient accessible guestrooms (at the same rate as guestrooms for other participants) will be located in the facility where meeting, etc., is held or in a facility housing the other participants.
- (14) One unobstructed entrance to each facility.
- (15) Doors operable by single effort.
- (16) Door handles no more than 48" from floor.
- (17) Elevator provided if over one story:
  - (a) Sensitive safety edges provided.
  - (b) Controls no more than 48" from floor.
  - (c) Controls with Braille numbers or letters.
  - (d) Accommodates wheelchair 29" X 45".

Rest rooms accessible to mobility impaired.

- (1) Level access for each sex on each floor.
- (2) Turnaround space 5' X 5'.
- (3) Door clearance of 32".
- (4) Grab rails provided.
- (5) Shelves, racks, dispensers, etc., not more than 48" for forward reach or 54 " for side reach.
- (6) Rest room signs indicating accessibility.

Wheelchair accessible telephones.

Accessible drinking fountains with cup dispensers.

Audible and visible fire alarms.

**Notification.** The Department of Children and Families Nondiscrimination Policy and Hearing-Impaired posters will be displayed in buildings' main entrances, lobby areas, waiting areas, and bulletin boards. The name, telephone number, and TDD number for the Title II ADA Coordinator will be listed on the hearing-

impaired poster to assure accessible services to customers, potential customers, or their representatives. Descriptive information on the availability of auxiliary aids and reasonable accommodations to persons requiring assisting devices or aids will be included in announcements related to meetings, seminars, workshops and conferences, as well as to services offered by the Department and its contracted service providers.

### **Auxiliary Aids Training.**

New employee orientation will include training on CFOP 60-10 Chapters 3 and 4, Title II ADA, and Section 504. All staff will be trained at hire and annually on how to assist sensory and mobility impaired or limited-English proficient customers in obtaining assisting devices and/or aids, or other reasonable accommodations. This training is mandatory and will be tracked.

Training will include:

- (1) Procedures for serving hearing-impaired, sight-impaired, mobility impaired, and limited-English proficient customers and potential customers.
- (2) Awareness of hearing impairments and deafness; speech impairments; sight impairments and blindness; reading impairments and dyslexia; and mobility impairments.
- (3) Communication options available.
- (4) How to provide reasonable accommodation for qualified customers and potential customers i.e., how to access or purchase auxiliary aids, interpreter services and physical modifications.
- (5) Requirements for making meetings, conferences and services accessible.
- (6) Awareness of the Auxiliary Aids and Limited-English Proficiency Plans, including how to access the Plans for reference.

### **Documentation/Record Retention.**

Records relating to the Auxiliary Aids and Limited-English Proficiency Plans, such as copies of materials used in training, including brochures used for customers of the Department nondiscrimination policy will be documented and maintained for three years by the Section 504/ADA Title II Coordinator for the subject program or service provider. CFOP 15-4, Records Management, governs the retention and destruction of records.

-All finalized requests for accommodations with relevant documentation will be forwarded to the Section 504/Title II ADA Coordinator **(See Appendix C)**

### **Compliance Monitoring.**

Monitoring will be accomplished through annual updates, surveys, compliance reviews, complaint investigations, and other related civil rights activities.

Monitoring the provision of auxiliary aids to customers or potential customers with hearing impairments, including the use of certified interpreters in all phases of service delivery, shall be conducted annually.

**Translation of Written Materials.** Written material (vital documents) routinely provided in English to applicants, customers and the public are to be available in regularly encountered languages other than English. It is vital that documents be identified and translated into the non-English language of each regularly encountered limited English proficient group eligible to be served or to be directly affected. Each program office will make sure non-English written materials, such as program forms, brochures, etc., are available to operational staff.

### **Competency of Interpreters and Translators.**

Certification of foreign language interpreters is not required; however, competency requires:

- (1) demonstrated proficiency in both English and the other language
- (2) fundamental knowledge in both languages including any specialized terms or concepts peculiar to the program or activity
- (3) sensitivity to the person's culture
- (4) a demonstrated ability to convey information in both languages, accurately

It is the responsibility of program managers and supervisors to ensure the competency of foreign-language interpreters.

Departmental or contract providers' employees who are utilized to interpret for the hearing impaired by American Sign Language (ASL) shall meet or exceed the education and communications skills established by this Plan.

An assessment of an individual's interpreting skills is required to determine their level of competency prior to their interpreting for customers with hearing impairments. Four levels of competency have been identified: apprentice, provisional, provisional +36 credit hours, and proficient. To achieve a level, the interpreter must meet established criteria. Each level has a specific duration period and requirements for maintaining the level. All current employees desiring to interpret for hearing impaired customers will have two (2) years to achieve the credentials required for the apprentice level of interpreting.

Interpreter Standards developed by the Florida Department of Education and modified for Departmental use are incorporated by reference into this Plan and are attached as Appendix A to this Plan.

It is the responsibility of managers, supervisors, and staff to familiarize themselves with and follow standards of etiquette when communicating with customers with physical or sensory disabilities and/or limited English proficiency. See Appendix A to this Plan

## **APPENDIX A**

### **IN-PERSON COMMUNICATION/ETIQUETTE**

#### **INTERACTING WITH INDIVIDUALS WHO ARE DEAF**

Deaf individuals have many different communication needs. People who were born deaf (pre-lingual deaf) may have more difficulty with speech than those who lost their hearing after they learned a language (post-lingual deaf). The way a person communicates will vary according to the environment in which he or she was raised, type of education received, level of education achieved, and many other factors. Their ability to communicate in a language will vary from not very well to very well.

Some individuals use American Sign Language (ASL) or other sign language; some read lips and speak as their primary means of communication; some use Signed Exact English (SEE), where every word is signed in the exact sequence it is spoken in English, and there is a vocabulary which has a one-to-one relationship to English words. People who became deaf later in life may never have learned either sign language or lip-reading. Although they may pick up some sign and try their best to read lips, their primary means of communicating may be reading or writing.

Lip-reading ability varies greatly from person to person and from situation to situation. It is greatly hindered by people who do not enunciate clearly, have mustaches shielding the lips, do not look directly at the person, or who speak with accents that affect the way the words appear on the lips. Therefore, when speaking with a person who reads lips, look directly at the person while speaking, make sure you are in good light source, and keep your hands, gum and food away from your mouth while you are speaking.

**When to use Interpreters:** Since communication is vital in the workplace and in service delivery, and the person who is deaf knows how he or she communicates best, supervisors and staff should follow the wishes of the person who is deaf regarding communication methods.

In casual situations and during initial contact, it is often acceptable to write notes to determine what the person needs. However, department policy is to use nothing less than a Quality Assurance (QA) Screened interpreter for service delivery. The need for a more skilled interpreter depends not only on the complexity and importance of the information being communicated, but also on the ability of the interpreter to translate the particular sign language used by the individual, and the speed.

## **INTERACTING WITH INDIVIDUALS WHO ARE HARD OF HEARING**

Persons who are hard of hearing may or may not know how to sign, and their means of communication will depend on the degree of hearing loss, when they became hard of hearing, etc. A person who is hard of hearing may or may not wear a hearing aid. Employees should be aware that many hard of hearing people will not admit having a hearing loss, so it is important employees be alerted to the **signs of hearing loss**:

- The person asks you to repeat yourself several times; and
- The person does not respond appropriately, especially if you have been talking with your back to them.

**The key to communication with a person with a hearing impairment – as with all people – is patience and sensitivity. Please use the following guidelines:**

- Ask the person how he or she prefers to communicate.
- **If you are using an interpreter, the interpreter may lag a few moments behind what is being said, so pause occasionally to allow time for a complete translation.**
- Talk directly to the person, not the interpreter. However, the person will look at the interpreter and may not make continuous eye contact with you during the conversation.
- **Before you speak, make sure you have the attention of the person you are addressing.**
- If you know any sign language, try using it. It may help you communicate and at least demonstrate your interest in communicating and willingness to try.
- **Speak clearly and distinctly at a moderate pace in a normal tone of voice, unless asked to raise your voice. Do not shout or exaggerate your words.**
- Look directly at the person. Most people with hearing impairments need to watch a person's face to help them understand what is being said. Do not turn your back or walk around while talking. If you look away, the person may assume the conversation is over.
- **Do not put obstacles in front of your face.**
- Do not have objects in your mouth, such as gum, cigarettes, or food.
- **Do not turn to another person in their presence to discuss them and their problems.**
- Write notes back forth, if feasible.
- **Use facial expressions and gestures.**
- Do not talk while writing, as the person cannot read your note and attempt to read your lips at the same time.
- **Use a computer, if feasible, to type messages back and forth.**
- Offer to provide an assistive listening device.
- **If the person has a service animal, such as a dog, do not divert the animal's attention. Do not pet or speak to the animal.**

## **INTERACTING WITH INDIVIDUALS WITH SPEECH IMPAIRMENTS**

Be tolerant and sensitive to persons with speech impairment. Please use the following guidelines:

- **Give the person your undivided attention.**
- If you have trouble understanding someone's speech, ask him or her to repeat what he or she has said. It is better for the person to know you do not understand than to assume that you do.
- **Do not simplify your own speech or raise your voice. Speak in a normal tone.**
- Write notes back and forth or use a computer, if feasible.
- **Ask for help in communicating. If the person uses a communicating device, such a manual or electronic communication board, ask the person how to use it.**

## **INTERACTING WITH INDIVIDUALS WITH PHYSICAL DISABILITIES**

As with all people, persons with physical disabilities have specific needs. Please use the following guidelines when communicating with a person with mobility or physical impairment:

- **Do not make assumptions about what the person can or cannot do. Always ask if the person would like assistance before you help. Your help may not be needed or wanted.**

- Do not touch a person's wheelchair or grab the arm of a person walking without first asking if he or she would like assistance.
- **Do not hang or lean on a person's wheelchair because it is part of the wheelchair user's personal space.**
- Never move someone's crutches, walker, cane, or other mobility aid without permission.
- **When speaking to a person in a wheelchair for more than a few minutes, try to find a seat for yourself so the two are at eye level.**
- Speak directly to the person in a wheelchair, not to someone nearby as if the wheelchair user did not exist.
- **Do not demean or patronize the wheelchair user by patting him/her on the head.**
- Do not discourage children from asking questions about the wheelchair. Open communication helps overcome fearful or misleading attitudes.
- **When a wheelchair user "transfers" out of the wheelchair to a chair, toilet, car or bed, do not move the wheelchair out of reach.**
- Do not raise your voice or shout. Use normal speech. It is Ok to use expressions like "running along". It is likely that the wheelchair user expresses things the same way.
- **Be aware of the wheelchair user's capabilities. Some users can walk with aid and use wheelchairs because they can conserve energy and move about quickly.**
- Do not classify persons who use wheelchairs as sick. Wheelchairs are used for a variety of non-contagious disabilities.
- **Do not assume that using a wheelchair is in itself a tragedy. It is a means of transportation/freedom that allows the user to move about independently.**

### **INTERACTING WITH PEOPLE WHO ARE VISUALLY IMPAIRED**

Persons with visual impairments have specific needs. Please use the following guidelines when communicating with persons who are blind or have a visual impairment:

- **The first thing to do when you meet a blind person is to identify yourself.**
- When speaking, face the person directly. Speak in a normal tone. Your voice will let the person know where you are.
- **Do not leave without saying that you are leaving.**
- Some individuals who want assistance will tell you. You may offer assistance if it seems needed, but if your offer is declined, do not insist.
- **When offering assistance, say, "Would you like to take my arm?" and allow the person to decline or accept. The movement of your arm will let the person know what to expect. Never grab or pull the person.**
- When going through a doorway, let the person know whether the door opens in or out and to the right or left.
- **Before going up or down stairs, let the person know that you are going up or down, and advise if there is a handrail and where it is. Ask the person if he or she would like assistance – he or she would let you know.**
- When giving directions or describing where things are in a room or in the person's path, be as specific as possible, and use clock clues where appropriate.
- **When directing the person to a chair, let the person know where the back of the chair is, and he or she will take it from there.**
- If the person has a service animal, do not distract or divert the animal's attention. Do not pet or speak to the animal unless the owner has given you permission.
- **The person's single greatest communication need is to have access to visual information by having information either read or provided in an accessible format (Braille, audio).**

### **INTERACTING WITH PEOPLE WITH DUAL SENSORY IMPAIRMENTS**

The means of communication with a person with dual sensory impairments will depend on the degree of hearing and vision loss. Use all of the suggestions in the above sections on hard of hearing and visual

impairments. The person with dual sensory impairments has unique and very challenging communications needs. Staff is to use every possible means of communication available.

### **INTERACTING WITH PEOPLE WITH LIMITED-ENGLISH PROFICIENCY**

- ❖ Many people who are eligible for services cannot effectively use those services because they are not proficient in English. Language barriers prevent us from effectively serving a large number of people. Breaking down these barriers will allow individuals with limited English proficiency to participate in the programs administered by the Department.
- ❖ **The way a person with Limited-English Proficiency communicates in English will vary from no English, to a little English or to very well. Use the following guidelines when communicating with a person with Limited-English Proficiency:**
- ❖ Ask the person if he/she needs a translator.
- ❖ **If you are speaking through an interpreter, remember the interpreter may lag a few moments behind what is being said, so pause occasionally to allow time for a complete translation.**
- ❖ Talk directly to the person, not the interpreter. However, the LEP person may look at the interpreter and may not make eye contact with you.
- ❖ **If you know a little of the language, try using it. It may help you communicate and least demonstrates your interest in communicating and willingness to try.**
- ❖ Do not simplify your speech or raise your voice. Speak in a normal tone.
- ❖ **The person's single greatest communication need is to have access to the information by having the information either orally translated or provided in their language written form.**
- ❖ Be patient and sensitive to the needs of the LEP person.

#### **APPENDIX B**

##### **DECLINATION OF FREE INTERPRETER SERVICES**

The Department of Children and Families, and its contracted providers, are required under law to provide sign-language interpreters for clients and potential clients with hearing impairments **at no cost to the client**. The Department of Children and Families and its contracted providers are also required to provide foreign language interpreters to limited-English proficient clients and potential clients at **no cost to the client**.

You have declined the Department of Children and Families' offer of free interpreter services and have chosen to have another individual interpret for you.

By your signature below, you acknowledge you have received notice that interpreter services will be made available to you free of charge and that you have declined our offer.

If you wish to have the Department of Children and Families provide free interpreter services, **do not** sign this form.

I, \_\_\_\_\_, acknowledge notice that the Department of Children and Families will provide a sign-language or foreign-language interpreter to me **free of charge** and I do not choose to accept this offer. I will provide my **own interpreter**.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of client/potential client

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Witness signature

## APPÉNDIX B

### DECLINACIÓN DE LOS SERVICIOS LIBRES DEL INTÉRPRETE

El departamento de niños y de familias, y sus abastecedores contratantes, se requieren bajo ley para proporcionar a los intérpretes del muestra-lenguaje para los clientes y los clientes potenciales de deterioros de oído en **ningún costo al cliente**. El departamento de niños y las familias y sus abastecedores contratados también se requieren para proporcionar a los intérpretes del idioma extranjero a los clientes peritos limitado-Ingleses y a los clientes potenciales en **ningún costo al cliente**.

Usted ha disminuido el departamento de oferta de los niños y de las familias de los servicios libres del intérprete y ha elegido tener otro individuo interpretar para usted.

Por su firma abajo, usted le reconoce ha recibido el aviso que los servicios del intérprete serán puestos a disposición usted gratuitamente y que usted ha declinado nuestra oferta.

Si usted desea hacer que el departamento de niños y de familias proporcione a servicios libres del intérprete, **no firme esta forma.**

I, \_\_\_\_\_ reconoce el aviso que el departamento de niños y de familias me proporcionará a un muestra-lenguaje o a intérprete del no nativo-lenguaje gratuitamente y no elijo validar esta oferta. Proporcionaré **a mi propio intérprete**.

Fecha

\_\_\_\_\_  
Firma del cliente/del cliente potencial

\_\_\_\_\_  
Nombre impreso

\_\_\_\_\_  
Firma del testigo

**DE B D'ANNEXE**

## LA DECLINAISON DE SERVICES D'INTERPRETE LIBRES

Le Département d'Enfants et les Familles, et ses fournisseurs contractés, sont exigé sous la loi pour fournir les interprètes de langage gestuel pour les clients et les clients potentiels avec les diminutions d'audience à aucun coût au client. Le Département d'Enfants et de Familles et ses fournisseurs contractés sont exigés fournir aussi des interpréteurs de langage étrangers aux clients compétents limité-anglais et les clients potentiels à aucun coût au client.

Vous avez décliné le Département d'Enfants et de Familles › l'offre de services d'interprète libres et a choisi d'avoir un autre individu interprète pour vous.

Par votre signature au dessous, vous reconnaissez vous a reçu la notification ces services d'interprète vous seront mis à la disposition gratuitement et que vous avez décliné notre offre.

Si vous souhaitez avoir le Département d'Enfants et de Familles fournit les services d'interprète libres, ne pas signer cette forme.

Je, \_\_\_\_\_, reconnaît la notification qui le Département d'Enfants et de Familles fournira un langage gestuel ou un étranger-interpréteur de langage à moi gratuitement et je ne choisis pas d'accepter cette offre. Je fournirai mon propre interprète.

Fecha

\_\_\_\_\_  
Firma del cliente/del cliente potencial

\_\_\_\_\_  
Nom imprimé

\_\_\_\_\_  
Signature de témoin

## APPENDIX C



### REASONABLE ACCOMMODATION REQUEST FORM (Americans with Disabilities Act and Section 504 of the Rehabilitation Act)

Requester's Name \_\_\_\_\_ Date Request Received \_\_\_\_\_

Home Phone: ( ) \_\_\_\_\_ Work/Cell Phone: ( ) \_\_\_\_\_

Address: \_\_\_\_\_  
Street Apt.# City State Zip Code

\_\_\_\_\_ I am currently employed by the Department and request a reasonable accommodation. My current job title is: \_\_\_\_\_

\_\_\_\_\_ I am applying for employment. The accommodation requested will allow me to participate in the interviewing process or assessment for (position title) \_\_\_\_\_

\_\_\_\_\_ I am requesting accommodation that will allow me to participate in the Agency's program activity or service.  
Activity/Service: \_\_\_\_\_

Please answer the following questions to assist the agency with understanding the basis and nature of your request for an accommodation. The information you provide will be treated confidentially and will be handled on a need-to-know basis.

1. Describe the accommodation needed which will enable you to perform the essential functions of the position, participate in the interviewing process/assessment or the Agency's program activity/service.

\_\_\_\_\_

2. Describe the disability that limits one or more of your major life activities. \_\_\_\_\_

\_\_\_\_\_

3. Describe how this accommodation will assist you. \_\_\_\_\_

\_\_\_\_\_

The attached documentation provided by my health care provider (if necessary) certified the need for the requested accommodation.

\_\_\_\_\_  
Requester's Signature

#### FOR DEPARTMENT'S USE ONLY

Accommodation provided: \_\_\_\_\_

\_\_\_\_\_

Date accommodation was provided: \_\_\_\_\_ By: \_\_\_\_\_

Position Title: \_\_\_\_\_ Phone Number: \_\_\_\_\_

Date and method requester was notified of approved accommodation \_\_\_\_\_

If accommodation was not provided, please explain. \_\_\_\_\_

\_\_\_\_\_

I, \_\_\_\_\_ notified Civil Rights Officer prior to denial of accommodation request on \_\_\_\_.

\_\_\_\_\_  
Program Administrator/Institution

\_\_\_\_\_  
Date

Date copy of request sent to Civil Rights Officer \_\_\_\_\_

Date Civil Rights Officer sent request to Inspector General/Civil Rights \_\_\_\_\_

# **APPENDIX D**

## **Resources for Hearing and Visual Impairment, Limited English Proficiency (LEP) and Other Disability Assistance**

### **SOUTHEAST REGION & CIRCUIT 17**

#### **Language Interpretation**

South Florida Translations  
561-444-8825

#### **Hearing Impairment**

#### **Disability Assistance**

ADA Help, Inc. (Broward)

6103 Umbrella Tree Lane  
Fort Lauderdale, FL 33319  
954-484-3539  
954-484-7149/Fax  
954-871-9733/Fax

#### **Center for Hearing and Communication**

Contact:

2900 W. Cypress Creek Rd. #3  
Fort Lauderdale, Florida 33309  
954-601-1930/Voice/TTY  
954-485-6336/Fax

#### **Accessible Communication for the Deaf**

#### **Southeast/Southern Civil Rights Officer**

Shenna Fluriach  
Phone: 786-257-5218  
Fax: 850-921-8470  
401 NW 2nd Avenue Suite S-926C  
Miami, FL 33128

19451 Sheridan St. Suite 340  
Pembroke Pines, FL 33332  
954-347-5749V  
954-241-5033/Fax

#### **Department of Children and Families**

Customer Call Center: 850-300-4323  
Florida Relay 711 or TTY 1-800-955-8771

#### **Blind**

#### **American Foundation for Visual Rehabilitation**

5333 North Dixie, Suite 101-A  
Fort Lauderdale, FL 33334  
954-776-5223 Fax 954-491-0027

Florida Council of the Blind  
1-800-267-4448

Florida Division of Blind Services/Broward  
954-746-1770  
Fax/DSL Line 954-746-1777  
[www.dbs.fldoe.org](http://www.dbs.fldoe.org)

Center for Independent Living of Broward  
4800 N. State Road 7, Suite 102  
Fort Lauderdale, FL 33319  
954-722-6400 Fax 954-735-1958

Lighthouse for the Blind of Broward  
650 North Andrews Avenue  
Ft. Lauderdale, FL 33311  
954-463-4217 Fax 954-764-3825