

**The Salvation Army
Brevard County Domestic Violence Program
Auxiliary Aids & Services Plan**

Policy: The Salvation Army DVP shall make every effort to provide services to eligible individuals regardless of race, religion, color, national origin, gender, age, mental or physical disability, sexual orientation, citizenship, immigration status, marital status, or language spoken.

General Procedures:

- a) The program's designated Single Point-of-Contact, Director Cindy Mitchell, coordinates and reports civil rights information.
- b) The Domestic Violence Program shall post information for applicants and participants about the process for requesting accommodations.
- c) Participants and applicants for services will be informed of the Center's internal and external discrimination complaint procedures.
- d) The Domestic Violence Program will conduct an internal civil rights assessment annually to determine areas of compliance and non-compliance, if applicable, and make any reasonable corrective actions.
- e) All direct-service Domestic Violence Program staff shall be trained annually about civil rights. Documentation shall be maintained in the employee's annual training file.
- f) Domestic Violence Program facilities shall meet applicable building codes and requirements.
- g) Service Animals may accompany participants into residential and non-residential services.
- h) Emotional support animals may accompany survivors in shelter.
- i) The program will plan for accessibility at off-site facilities utilized by the Center, such as those for group activities, fund raisers, or other special events. The program will post the three-page DCF posters at sites that are used routinely for services. The public will be notified of how to request special accommodations for special events (if the event is being offered by the program).
- j) Room and advocate assignments shall not be based on race/ethnicity.
- k) The program will make reasonable efforts to accommodate residents' requests for providing culturally appropriate or special dietary needs (i.e. cultural, religious, and/or food items).
- l) The Domestic Violence Program will provide accommodations required by law, as requested, for essential services.

A. Support to the Deaf or Hard-of-Hearing

Purpose: To outline how the Domestic Violence Program will accommodate participants who are Deaf or Hard-of-Hearing.

Policy: The Salvation Army Brevard County Domestic Violence Program will comply with section 504 of the Rehabilitation Act of 1973, 29 U.S.C. 794, as implemented by 45 C.F.R. Part 84 and the Americans with Disabilities Act of 1990, 42 U.S.C. 12131, as implemented by 28 C.F.R. Part 35, and the Children and Families Operating instruction (CFOP) 60-10, Chapter 4, entitled "Auxiliary Aids and

Services for the Deaf and Hard-of-Hearing.”

1. The program’s designated Single-Point-of-Contact for support to the Deaf or Hard-of-Hearing is Director Cindy Mitchell.
2. The Single-Point-of-Contact shall coordinate activities and reports and ensure effective communication with deaf and/or hard-of-hearing participants or their companions.
3. The Single-Point-of-Contact shall ensure that employees are aware of the requirements, roles, and responsibilities and contact points associated with compliance.
4. Employees shall attest in writing that they are familiar with the requirements of Section 504, the ADA, and CFOP 60-10, Chapter 4. This attestation shall be maintained in the employee’s personnel file.
5. The Single-Point-of-Contact shall ensure that conspicuous notices which provide information about the availability of appropriate auxiliary aids and services at no-cost to the deaf or hard-of-hearing participants or companions are posted near where people enter or are admitted. Notices are available on the internet at <http://www.dcf.state.fl.us/admin/ig/civilrights.shtml>
6. The program shall document the participant’s or companion’s preferred method of communication and any requested auxiliary aids/services services provided in the participant’s or companion’s file. Documentation, with supporting justification, must also be made if the request was not honored. The program shall distribute participant feedback forms to customers or companions, and provide assistance in completing forms as requested by the participant or companion.
7. If a participant or companion is referred to other agencies, the program must ensure that the receiving agency is notified of the participant’s or companion’s preferred method of communication and any auxiliary aids/service needs, provided consent for such is obtained from the participant.
8. **Provision of Interpreters in a Timely Manner:**
Staff shall provide interpreters for customers and companions who are deaf or hard-of-hearing in a timely manner in accordance to the following standards:
 - a) If it is a **scheduled appointment**, you must have a **certified** interpreter at the time of the scheduled appointment. If the interpreter fails to appear, staff shall take whatever additional actions are necessary to make a certified interpreter available to the customer or companion as soon as possible, but in no case later than two (2) hours after the scheduled appointment, or as convenient to the customer or companion.
 - b) **If it is a non-scheduled appointment, or non-emergency situation**, you must provide a certified interpreter within **two 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 in no case later that two (2) hours from the time the customer or companion requests an interpreter, whichever is earlier.
 - c) **Non-Scheduled Interpreter Request:** If the situation is not an emergency, staff shall offer to schedule an appointment (and provide an interpreter where necessary for effective communication) as convenient to the customer or companion, but at least by the next business day.
 - d) **Scheduled Interpreter Requests:** For scheduled events, staff shall make a certified interpreter available to the customer or companion who is deaf or hard-of-hearing as

soon as possible, but in no case later than that two (2) hours after the scheduled appointment.

9. For Persons who are Deaf or Hard-of-Hearing:

- a. Staff will conduct an assessment, prior to services, to determine the customer or companion's preferred method of communication. Staff shall consult with the customer to determine his or her preferred communication method, and if applicable, with assigned caseworkers, counselors, parents, family members, guardians, or other representative. Staff shall accomplish this by first completing the Customer Companion Communication Assessment Form and the Request for a Waiver of Free Commutation Assistance Form.
- b. The communication options for persons who are deaf or hard-of-hearing may include but not limited to CART, Florida Relay Service, TDDs (Telecommunications Devices for the Deaf), FAX (Telephone Facsimile Transmittal), phone amplifiers, qualified or certified sign language interpreter, flash cards, lip-reading, written notes, supplementary hearing devices, charts, signs or a combination of these, as appropriate.
- c. If an interpreter is needed, staff shall contact a certified interpreter from their listing of interpreter services. Staff shall obtain verification of the interpreter's certification.
- d. The program has the responsibility for approving the request and obtaining the appropriate auxiliary aid or service.
- e. The use of auxiliary aids, certified sign language interpreters, or translators will be at no cost to the customer or companion.
- f. Documentation of Customer Companion Communication Assessment form shall be recorded in the service file.
- g. Each customer or companion who is deaf or hard of hearing shall be provided a Customer Feedback Form by the Single Point of Contact, or designee, following their visit. The Customer Companion Feedback Form is provided to the customer or companion to ensure the effectiveness and appropriateness of the auxiliary aid or service provided and the performance of the interpreter provided. Staff shall document in the service notes that the form was provided.

10. Effectiveness of Communication:

In the event that communication is not effective or if the nature of the communication changes significantly after the initial communication assessment, the program 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 aides or services.

11. Denial of Auxiliary Aids or Services:

If the program staff determine after conducting the communications assessment that the communication situation is not Aid Essential and does not warrant provision of the auxiliary aid or service requested by the customer or companion, the program 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 members who made the determination, and the basis for the determination. The program

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. Staff shall also record the denial of requested service in the customer's service file. Notwithstanding the denial, the program 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 service file. Denial determinations can only be made by the program's Single Point of Contact.

NOTE: Staff who are unfamiliar with the auxiliary aid or service requested shall contact their Single Point of Contact (SPOC/Civil Rights Officer), or their supervisor, for assistance in locating appropriate resources to ensure effective communication with clients, customers, and companions.

12. Dissemination:

- a) A copy of the program's auxiliary aids and service plan will be posted on the program's web site.
- b) Copies in alternative format will be provided upon request.
- c) Copies are distributed upon request to individuals or organizations serving persons with disabilities or who are Limited English Proficient.

13. Documentation/Record Retention:

- a) Records relating to the auxiliary aids and services provided shall be retained by the program and the original document retained in the client or customer's file or records.
- b) All final requests for accommodations, along with relevant documentation, will be forwarded to the designated 504/ADA Coordinator.

14. Notification:

- a) The program's non-discrimination policy, Limited English Proficient and Interpreter Services for the deaf or hard of hearing posters will be displayed in buildings' main entrances, lobby areas, waiting areas, and on bulletin boards.
- b) The name, telephone number, and TDD number for the 504/ADA Coordinator or Civil Rights Officer will be listed on the poster for the deaf or hard of hearing to ensure accessible services to customers and companions.
- c) Descriptive information on the availability of auxiliary aid and services to persons requiring assistive listening devices or aids will be included in announcements related to meetings, employment or job opportunities, seminars, workshops and conferences, as well as to services offered by the program.

15. Domestic Violence Program Essential Services:

When an applicant or participant who is deaf or Hard-of-Hearing requests services, staff will offer to conduct a communications assessment, and provide auxiliary aids or services, at no cost to the individual, as requested for all essential services. Essential services include all core Domestic Violence services:

1. Safety Planning
2. Information and Referral Services
2. Counseling Services
4. Service Management
5. Emergency Shelter for 24 hours or more
6. Hotline Services
7. Child Assessments
8. Community Education
9. Professional Training

B. *Services to Participants Who are Blind or Have Low-Vision*

Purpose: To outline how the Domestic Violence Program will accommodate participants who are blind or have low-vision.

Policy: The Salvation Army Domestic Violence Program will make reasonable accommodations for persons who are blind or have low-vision upon request.

Procedures: The Domestic Violence Program will make reasonable accommodations upon request for blind and/or low-vision participants through the use of:

- a) Braille signs in facilities
- b) Offering alternate formats of essential center written material (i.e. Braille documents, recorded information, large-print or high-contrast material, spoken reading of material, or other accommodation)
- c) Audible fire and security alarms

C. *Services to Limited English-Proficient Participants*

Purpose: To outline how the Domestic Violence Program will provide reasonable accommodations to participants that have limited or no English proficiency.

Policy: The Domestic Violence Program shall not decline to provide services based on language spoken by a participant.

A. *General Procedures:*

- a) The Domestic Violence Program will have essential program information available in Spanish. The program will make reasonable efforts to provide written information in other languages as requested.
- b) The Domestic Violence Program will make reasonable efforts to locate interpreters to facilitate communication with non-English proficient survivors. The program may use telephone-based interpretation services, at no cost to the survivor, for languages spoken that no other interpreter can be identified.
- c) Telephone-based interpretation services may be utilized for communicating with participants in telephone calls or for other essential services. Staff may call for language interpretation services in a three-way call format.

- d) Persons associated with participants (children, other relatives, or friends) are not appropriate people to provide interpretation services and shall not be used, except in a medical or security emergency, in this capacity.

B. Ensuring Language Access for the Provision of Services Provided:

It is important to understand how individuals who are limited English proficient (LEP) interact with the program. Examples may include, but are not limited to:

- a) Program applicants and participants
- b) Hotline or information calls
- c) Outreach programs
- d) Public meetings
- e) Public access to the program's website
- f) Written materials or complaints sent
- g) Brochures intended for public distribution

The program will provide notices to LEP persons letting them know that language access services are available and that they are free of charge. This notice should be provided in a language that the LEP person will understand. This will include posting signs in intake areas and other entry points. The signs should be translated in the most common language encountered.

D. *Serving Persons with Physical or Mental Disabilities*

Purpose: To outline how the Domestic Violence Program will make reasonable accommodations to participants that have mobility or mental disabilities.

Policy: The Domestic Violence Program shall make reasonable efforts to accommodate a participant's physical or mental disability.

General Procedures:

- a) Individuals who require special care due to a mental or physical disability shall be eligible for shelter with their caretaker(s). The Salvation Army DVP will make reasonable efforts to assist the survivor in securing appropriate care if requested. Examples are assisting the survivor with obtaining wheelchairs, oxygen deliveries, home health care, etc. as appropriate. The Domestic Violence Program, however, is not responsible for the cost associated with these outside items or services.
- b) Upon request, the Domestic Violence Program will make reasonable accommodations (i.e. a private room if requested, if possible) to assist persons with a mental or physical disability to utilize services.

E. *Training:*

Training is essential to the ongoing success of providing auxiliary aides and services to persons with disabilities or those who are Limited English Proficient.

New employee and direct service volunteer orientation will include training on CFOP 60-10, Chapters 1, 3, and 4, Title II of the Americans with Disabilities Act of 1990, CFOP 60-16, Methods of Administration, and Section 504 of the Rehabilitation Act of 1973. This will be accomplished within 60 days of commencing employment for staff providing direct services to participants.

All staff will receive training annually on how to provide assistance to persons with disabilities and who are Limited English proficient. This training is mandatory. Training will include:

- a) Procedures for serving customers and companions who are deaf, hard of hearing, low vision, blind, and persons who have mobility limitations.
- b) Procedures for serving persons who are Limited English Proficient.
- c) Awareness of deaf or hard of hearing; speech limitations; low vision and blindness; reading limitations and dyslexia; and mobility limitations.
- d) Available communication options.
- e) How to provide reasonable accommodations for participants and potential participants, i.e., how to access or purchase auxiliary aids interpreter services and physical modifications.
- f) Requirements for making meetings, conferences, and services accessible.
- g) Awareness of the Auxiliary Aids and Service Plan, including how to access the Plan.

F. Revisions:

The Auxiliary Aids and Service Plan (Accommodations Plan) will be updated as needed, but at least annually, by March 31 each year. Staff shall be notified of all changes/updates to program operating procedures, and Auxiliary Aids and Service Plans within sixty days of such changes.

G. Plan Review:

The last accommodations plan was signed by the Assistant Secretary of Administration, June 6, 2012.

APPENDIX

Resources

Certified Sign Language Interpreters

American Sign Language Services

1-888-SIGN-ASL ext. 320 (1-888-744-6275 ext. 320).

Phone: 407-518-7900

Toll Free: 1-888-SIGN-ASL

FAX: 407-518-7903

TTY: 407-518-9050

After-Hours Emergency Pager: (407) 931-8050

Address: ASL Services, Inc.

3700 Commerce Blvd. Suite 216

Kissimmee, FL 34741

TDD/TTY

The program has TDD/TTY machines available. TDD/TTY machines are for telephone communication. A deaf, hard-of-hearing, and/or Speech Disabled person can initiate and receive telephone calls through typing on a specialized keyboard that is attached to a phone line. The message is received through another TDD/TTY machine.

Florida Relay

Florida relay receives TDD/TTY messages from the deaf or hard of hearing user, or speech disabled user and verbally communicates the message at the other end of a telephone call. There may be alternate providers of the relay service. Domestic Violence hotline services are available through Florida Relay or TTY.

To call Florida Relay, dial **7-1-1**, or use the appropriate toll free numbers below:

1-800-955-8771 (TTY)

1-800-955-8770 (Voice)

1-800-955-1339 (ASCII)

1-877-955-8260 (VCO-Direct)

1-877-955-5334 (STS)

1-877-955-8773 (Spanish)

Florida Relay makes it easy for Spanish-speaking and English-speaking Florida Relay users to call one another by phone. All call types processed through Florida Relay are also available in Spanish. This includes TTY, VCO, HCO, and STS.

In addition to Spanish-to-Spanish relay, Florida Relay also offers English-to-Spanish and Spanish-to-English translation 24/7 365 days a year. In order for a Relay call to be translated, callers must request a Spanish CA when dialing 711 or dial the Florida Relay Spanish number directly at (877) 955-8773.

Qualified Foreign Language Interpreters:

Optimal (telephone-based interpretation)

Video Remote Interpreting provider and information:

Language People at www.languagepeople.com or (707) 538-8900 for assistance

Assistive Listening Devices

A pocket talker and an amplified telephone are available for use in the program.

Captioning in Real Time (CART) providers:

Rockledge	Debra M. Arter, RDR, CRR Arter Reporting Services P.O. Box 560368 Rockledge, FL 32956-0368 321-632-5806 321-632-0386(fax) arterreporting@cfl.rr.com	Orlando, Florida
Palm Bay	Lisa B. Johnston, RMR, CRR, CCP 1070 Hoyt Court NE Palm Bay, FL 32907 321-698-9050 Cell 321-951-7722 Home 321-951-7723(fax) LJohnston27@cfl.rr.com	Orlando, Florida Melbourne, Florida Vero Beach, Florida