



**Auxiliary Aids
and
Service Plan
(AASP)**

Revised October 2015

Whether in our correspondence with our clients and customers via email, over the phone, one-on-one, or in a group setting, we want to ensure that we offer an opportunity for people to clearly express themselves and state their needs through meaningful communication. 4KIDS is committed to providing all deaf, hard of hearing, or Limited English Proficient (LEP) clients and customers with necessary auxiliary aids and services, as well as providing accommodation to those with qualified disabilities, All such auxiliary aids and services will be provided at no cost to the individual if they are deemed necessary for effective communication and if such accommodation does not constitute an undue hardship on 4KIDS.

4KIDS primary service is to foster families, adoptive families and to all those who live, have lived, or temporarily reside in our residential facilities. 4KIDS does not provide holistic social services or material goods to the community at large or to “walk-in” customers. Neither do we advertise such services to the community. Our policy is to refer all individuals seeking such services, material goods, or counsel to entities in the community which are best suited to providing this assistance.

Designated Single Point of Contact (SPOC)

Each subcontracted agency of the Florida Department of Children and Families (DCF) must designate a Single Point of Contact (SPOC) within its agency. Shelley Numa is 4KIDS designated SPOC, overseeing the coordination involved in providing necessary auxiliary aids and services to customers and clients.

Questions Relating to the Provision of an Auxiliary Aid or Service

In the event that a staff member is ignorant of a particular auxiliary aid or service or how to appropriately provide such aid or service to a customer or client, the staff member should contact Shelley Numa, 4KIDS designated SPOC:

Office: 954-590-1508

Cell: 314-795-8947

Email: ShelleyN@4kidsofsfl.org

Civil Rights Notification Posters

All employee work sites have and will maintain postings of the following three required DCF posters, which are available for public viewing by staff, customers, and clients¹:

- Nondiscrimination poster
- Hearing Impaired poster
- Limited English Proficient poster

New Employee Orientation

As part of 4KIDS orientation process, all new staff are required to complete the Health & Human Services (HHS) Modules 1-3 within 60 days of their hire date.² This same training is required on an annual basis for all direct care staff. This mandatory HHS training provides detailed instructions on how to provide auxiliary aids and services to persons with disabilities.³

Annual Employee Training

All staff are required to participate in an annual staff training on how to assist persons with disabilities, those who are deaf or hard of hearing, and those who are Limited

¹ CFOP 60-10, Chapter 3-15

² CFOP 60-10, Chapter 3-16a

³ <http://www.myflfamilies.com/service-programs/deaf-and-hard-hearing/training>

English Proficient.⁴ This training will be conducted by the Human Resources Department.

In addition, 4KIDS SPOC, all directors, and all supervisors will undergo annual training as it relates to ADA compliance.⁵

Availability of On-Site Assistive Listening Devices

In cases requiring on-site assistive listening devices, pocket talkers can be used to communicate with customers or clients. 4KIDS owns five pocket talkers, which are assistive listening devices meant to amplify noise in the direct proximity of an individual who is deaf or hard of hearing. The pocket talker not only amplifies noise, but it likewise lessens surrounding sounds. Pocket talkers can be found at all five of the below 4KIDS sites:

- ❖ Broward Administrative Office
- ❖ Palm Beach Administrative Office
- ❖ Treasure Coast Administrative Office
- ❖ Broward Intake Shelter
- ❖ Palm Beach Intake Shelter

Use of Required DCF Forms

At the time of interaction with a customer or client who may be in need of an auxiliary aid or service, staff must utilize the DCF form for assessing the particular need. This form, known as the “Request by Customer or Companion Who is Deaf or Hard of Hearing for Free Communication Assistance,” must be provided to the customer or client to fill out. After the client or customer fills it out, staff will know whether or not the customer or client wants to officially request that 4KIDS provide an auxiliary aid or service. Depending on the client or customer response, corresponding action should be taken—whether the client/customer is waiving their right or requesting an auxiliary aid or service.

Staff must document all interaction with clients or customers who are considered to be deaf, hard of hearing, low vision, blind, or Limited English Proficient. Staff must do so by using the “Customer or Companion Communication Assessment and Auxiliary and Service Record” form. (Instructions for completing this form are attached to the form itself.)

At the end of a staff interaction with a client or customer who is deaf or hard of hearing, staff must provide them with a “Customer Feedback Form.” Staff are required to

⁴ CFOP 60-10, Chapter 3-16b

⁵ CFOP 60-10, Chapter 1-6

provide this form, whether or not the client or customer decides to complete it and send it to DCF.

Record Retention

Staff at each respective 4KIDS shelter or local office shall notify Shelley Numa, 4KIDS SPOC, and shall maintain records of all documents and forms detailing the provision of auxiliary aids and services to customers and companions. All original forms and documents shall be kept in the client or customer's file or record for future reference.⁶

Deference to the Wishes of the Customer or Companion

When assessing the need for an auxiliary aid or service for any given customer or companion, staff should automatically defer to the particular preference and desires of the customer or companion.⁷ For instance, if the customer or companion would prefer to interact with an interpreter in-person, rather than through a video remote interpreter, then we are committed to honoring their preferred method of communication. 4KIDS policy is to honor all such requests, keeping in mind the end goal of effective communication, provided that the request does not constitute an undue hardship on 4KIDS.

Timeline for Requesting an Auxiliary Aid or Service for Customers who are Deaf or Hard of Hearing

Once it has been determined that a customer or companion who is deaf or hard of hearing is requesting and in need of an auxiliary aid or service, staff should ensure that this request is fulfilled as quickly as possible.⁸

- **Unscheduled Client/Companion Visits:** For emergencies, certified interpreters must arrive within two hours; in cases of non-emergency, interpreters should arrive as soon as possible, but no later than the next business day.
- **Scheduled Client/Companion Visits Involving an Interpreter:** A certified interpreter or certified CART (Communication Access Real-time Translation) provider must be accessible at the time of the pre-arranged visit.
- If an interpreter does not show up at the time of the pre-arranged visit, staff will take whatever steps necessary to ensure that a certified interpreter is made accessible as quickly as possible and absolutely no later than two hours after the scheduled visit/meeting.

⁶ CFOP 60-10, Chapter 3-17

⁷ CFOP 60-10, Chapter 1-5c(3)

⁸ CFOP 60-10, Chapter 3-12

Contacting a Sign Language Interpreter on a 24/7 Basis

It is important that we serve all deaf and hard of hearing customers and companions in a timely manner. If and when staff are made aware of the need for a sign language interpreter at an unusual time of day or night, the staff member should contact Absolute Quality Interpreting (AQI):

Phone: (813) 785-1214 –voice/text
Fax: (813) 200-3469

AQI provides professional sign language interpreting services, including video remote interpreting services, on a 24/7 basis.

Contact information for other sign language interpreters can be found in Appendix A of this AASP.

TDD/TTY Services, Florida Relay Service, and Video Remote Interpreting

4KIDS has access to a variety of resources for persons with sensory disabilities.

While 4KIDS does not own TTY or TDD communication technology, we can utilize the services of various agencies in order to appropriately communicate with persons who are deaf or hard of hearing.

Florida Relay Service (FRS) is a service offered to all Floridians.⁹ This service works through the phone lines, allowing a hearing person to understand and effectively communicate with an individual having a sensory disability. A skilled operator acts as the facilitator of communication and is available on a 24/7 basis. Access to Florida Relay can be achieved through the following means:

- Dialing 7-1-1
- 1-800-955-8770 (voice)
- 1-877-955-8260 (VCO)
- 1-800-955-1339 (ASCII)
- 1-877-955-8707 (French Creole, 8am to 2am)
- 1-800-955-8771 (TTY)
- 1-877-955-5334 (STS)
- 1-877-955-8773 (Spanish)

Video Remote Interpreting (VRI) is a means of communication involving videoconference technology. VRI can be utilized on a spontaneous basis or by appointment. Interpreters through VRI can either interpret foreign languages or provide

⁹ Further information on Florida Relay can be obtained by going to Appendix I of the 2015 Statewide Auxiliary Aids and Service Plan for Persons with Disabilities and Persons with Limited English Proficiency: <http://www.dcf.state.fl.us/admin/servicedelivery/docs/DCFStatewideAuxiliaryAidsandServicesPlan.pdf>.

sign language interpretation. VRI services can be obtained by contacting Language People at:

Phone: (707) 538-8900

Website: www.languagepeople.com

Verification of a Sign Language Interpreter's Certification

Staff should never assume the credentials of any given American Sign Language (ASL) interpreter, but are responsible for requesting appropriate credentials over the phone or via email prior to using the services of any given interpreter. Staff are likewise responsible for verifying those credentials prior to contracting with that particular interpreter. In addition, staff should ask to visibly see the credentials involving in-person visits by an ASL interpreter.

All ASL interpreters must be certified through the Registry of Interpreters for the Deaf (RID) or the National Association of the Deaf (NAD).¹⁰

Foreign Language Interpreters

Please see Appendix B for a list of foreign language interpreter resources.

Cases Involving Ineffective Communication through an Auxiliary Aid or Service

Once an auxiliary aid or service has been provided for a customer or companion who is deaf or hard of hearing, staff should be observant as to the effectiveness of the particular method of communication chosen. It is the responsibility of staff to continually assess the communication with the customer or client, as the goal is to gain 100% understanding. If the method of communication chosen by the customer or companion proves ineffective, staff will work with the individual to seek alternative methods in order to achieve effective communication.

Denial of an Auxiliary Aid or Service

Staff should do their best to provide necessary auxiliary aids or services to all customers or companions when such service is requested. An auxiliary aid or service should rarely be denied.¹¹ When considering denial, the following two considerations should chiefly be considered: 1) whether the auxiliary aid or service is aid essential¹² (i.e., necessary for essential communication) and/or 2) whether the provision of the

¹⁰ CFOP 60-10, Chapter 3-11b

¹¹ CFOP 60-10, Chapter 3-9b(3)

¹² See CFOP 60-10, Chapter 3, Attachment 3 for examples of situations involving aid essential communication.

requested auxiliary aid or service constitutes an undue hardship on 4KIDS. Denial of a requested auxiliary aid or service should be rare and must be fully documented, as well as the rationale for denial, on the “Customer or Companion Communication Assessment and Auxiliary Aid and Service Record” form. DCF requires that final denial determinations be solely made by the Regional Director/Circuit Administrator/Hospital Administrator or their Designee or the Contracted Client Services Provider or their Designee.

Reasonable Accommodation Provisions: Public Notices, Job Announcements, and within the Employee Handbook

4KIDS is committed to providing all necessary auxiliary aids and services for those individuals with sensory disabilities or Limited English Proficient individuals who would like to participate in agency meetings, conferences, and seminars, so long as this provision does not constitute an undue hardship on 4KIDS. As all such meetings, conferences, and seminars are pre-scheduled, 4KIDS will provide the following standard notice on all public notices and advertisements, including public meeting announcements:¹³

4KIDS welcomes all individuals with disabilities and those who are Limited English Proficient. We encourage participation in all agency conferences and meetings. If you have a sensory disability or are Limited English Proficient, we will provide you with all necessary auxiliary aids or interpreters, free of charge, provided that such accommodation does not constitute an undue hardship on 4KIDS. Please call (name of coordinating event staff member) at (phone number of coordinating event staff member) or send an email to (coordinating event staff member email) by (date) in order for us to provide necessary accommodations.

4KIDS online employment page contains the following notice, available for viewing by all candidates:¹⁴

4KIDS maintains a policy of nondiscrimination, providing reasonable accommodation to qualified individuals with disabilities, provided that such accommodation does not constitute an undue hardship on 4KIDS. If an accommodation is needed in order to participate in the application process, please contact 4KIDS by calling 954-979-7911 and asking for the Human Resources Department or email us at 4KIDSHR@4kidsofsfl.org.

4KIDS current employee handbook contains the following verbiage as it relates to current staff:¹⁵

¹³ CFOP 60-10, Chapter 3-14b

¹⁴ CFOP 60-10, Chapter 1-5a

¹⁵ CFOP 60-10, Chapter 1-5b

If you have a disability and believe you need a reasonable accommodation to perform the essential functions of your job, contact the Human Resources Department. 4KIDS encourages individuals with disabilities to come forward and request reasonable accommodation.

Client Grievance Policy and Procedure

If a job applicant, employee, customer, or client feels that they have been discriminated against and would like to file a complaint, they may do so internally or externally.¹⁶

Internal complaints are handled by the DCF Office of Civil Rights or the local Civil Rights Officer. Anyone wishing to file an internal complaint should contact the DCF Office of Civil Rights:

Office of Civil Rights
1317 Winewood Blvd., Bldg 1, Room 110
Tallahassee, Florida 32399-0700
(850)487-1901; TTY (850) 922-9220; Fax (850) 921-8470

External complaints are handled by several federal departments. Anyone wishing to file an external complaint should contact one of the below entities:

United States Department of Health and Human Services (HHS)
Attention: Office for Civil Rights
Atlanta Federal Center, Suite 3B70
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8909
(404) 562-7888; TDD (404) 331-2867; Fax (404) 562-7881

United States Department of Agriculture (USDA)
Director, Office of Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410
(800) 795-3272 or (202) 720-6382(TTY)

United States Department of Agriculture (USDA)
Attention: Office of Civil Rights
Atlanta Federal Center, Suite 8T36
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-3247
(404) 562-0532; TDD/TTY (202) 720-5964; or Fax (404) 527-4517

United States Department of Justice (USDOJ)
Office for Civil Rights – Office of Justice Programs

¹⁶ CFOP 60-10, Chapter 1-5d

810 7th Street, NW
Washington, D.C. 20531
(202) 307-0690; TDD/TTY (202) 307-2027; Fax (202) 616-9865

United States Department of Justice (USDOJ)
Civil Rights Division – Disability Rights Section
1425 New York Avenue
Washington, DC 20530
(800) 514-0301; (800) 514-0383

District Director, Miami District Office (EEOC)
United States Equal Employment Opportunity Commission
One Biscayne Tower, Suite 2700
2 South Biscayne Boulevard
Miami, Florida 33131
(305) 808-1740; (800) 669-4000; Fax (305) 808-1855

Executive Director (FCHR)
Florida Commission on Human Relations
2009 Apalachee Parkway, Suite 200
Tallahassee, Florida 32301-4857
(850) 488-7082; Fax (850) 488-5291

Staff in receipt of a customer/client complaint are required to forward all such complaints on the DCF Office of Civil Rights with 24 hours of receipt.

All three required DCF postings, as visible in the lobbies of our office sites, provide details for who to contact to file a complaint, whether with the DCF Office of Civil Rights, the U.S. Department of Agriculture Office of Civil Rights, the U.S. Department of Health and Human Services Office for Civil Rights, or the Florida Commission on Human Relations.

Moreover, all staff are required to sign an ADA acknowledgement form prior to beginning employment with us. This form likewise details how to file an external complaint with the U.S. Department of Health and Human Services Office for Civil Rights.

Public Access to the 4KIDS Auxiliary Aids and Service Plan

4KIDS AASP is available, both on the Intranet, as well as on our website under the “4KIDS Quick Links” at the bottom of our homepage: www.4kidsofsfl.org. Our AASP will be reviewed, with the potential for revision, on an annual basis. A current copy will be submitted to the DCF Office of Civil Rights by March 31st of each year. Staff will be

notified and alerted to the availability of the newest most updated version of our AASP within 60 days.¹⁷

Alternative Formats of the 4KIDS Auxiliary Aids and Service Plan

Alternative formats of the 4KIDS AASP will be made available upon request.¹⁸

¹⁷ CFOP 60-10, Chapter 3-15c

¹⁸ CFOP 60-10, Chapter 3-7

Appendix A – List of Sign Language Interpreters¹⁹

- Coda Link
(954) 423-6893
(954) 423-2315
www.codalinkinc.com
staff@codalinkinc.com
8963 Stirling Road, Suite 6
Cooper City, FL 33328

- Glades Initiative
Julio Mariaca, Sign Language and Language Interpreter
(561) 996-3310
<http://www.gladesinitiative.org/>

- Accessible Communication for the Deaf
Lisa Gauntlett
(954)578-3081; (954) 347-5749 (TTD/TTY)
<http://www.acdasl.com/>

- Registry of Interpreters for the Deaf (RID)
(703) 838-0030
TTY: (703) 838-0459
<http://www.rid.org>

¹⁹ A more extensive list can be obtained from the 2015 Statewide Auxiliary Aids and Service Plan for Persons with Disabilities and Persons with Limited English Proficiency, accessible at:
<http://www.dcf.state.fl.us/admin/servicedelivery/docs/DCFStatewideAuxiliaryAidsandServicesPlan.pdf>.

Appendix B – Qualified Foreign Language Interpreters²⁰

- Language Line
24/7 translation service in over 200 languages
(866) 874-3972
<http://www.languageline.com/>

- Interpreters Network Inc.
ASL, Translation, and Language Interpretation
(305) 381-9555
jsbdomino@aol.com

- Link Translations and Interpretation, Inc.
Translation and interpretation services
(305) 790-9071 or (877)272-5465
<http://www.linktranslations.com/>
ltranslate@aol.com
16560 NW 1st Street
Pembroke Pines, FL 33028

²⁰ A more extensive list can be obtained from the 2015 Statewide Auxiliary Aids and Service Plan for Persons with Disabilities and Persons with Limited English Proficiency, accessible at:
<http://www.dcf.state.fl.us/admin/servicedelivery/docs/DCFStatewideAuxiliaryAidsandServicesPlan.pdf>.