UNITED WAY
Lee, Hendry, and Glades

Communication Assistance, Accessibility, and Reasonable Modifications Policy

1. Purpose

To ensure that individuals seeking or receiving services, and their companions, have equal and meaningful access to United Way (UWLHG) programs, services, activities, referrals, and benefits. The organization will identify communication needs, provide appropriate communication assistance and reasonable modifications, document services provided, and support continuity of access when referrals are made.

2. Scope

This policy applies to employees, volunteers, and contracted service providers who interact with individuals or companions seeking or receiving services. It applies to telephone and information inquiries, intake and assessment, service delivery, referrals, complaints, outreach, meetings, written communications, and other program activities.

3. Policy Statement

UWLHG will provide reasonable modifications, auxiliary aids and services, and language assistance when necessary to provide individuals with disabilities and individuals with Limited English Proficiency (LEP) an equal opportunity to participate in and benefit from services. Communication assistance will be provided at no cost to the individual or companion.

4. Definitions

- Limited English Proficiency (LEP): A person who does not speak English as a primary language and has a limited ability to read, write, speak, or understand English.
- Auxiliary aids and services: Communication support that enable individuals with disabilities to effectively access and participate in services, such as qualified interpreters, assistive listening devices, written materials, accessible formats, CART, relay services, or other effective methods.
- Reasonable modification: A change to a policy, practice, procedure, communication method, or service delivery approach when necessary to provide equal access to an individual with a disability.
- Companion: A person with whom staff would ordinarily communicate regarding an individual receiving services, including a person identified by the individual to assist with communication or decision-making.
- SPOC: The organization's designated Single Point of Contact for coordinating accessibility and communication assistance responsibilities, when applicable.

5. Procedures

5.1 Identification and Assessment of Communication Needs

- At the initial point of contact, staff will identify whether the individual or companion needs language assistance, an auxiliary aid/service, or a reasonable modification.
- Staff will ask the individual or companion about the preferred method of communication and give primary consideration to that preference when determining an effective method of communication.
- When needs change or communication is ineffective, staff will reassess the communication need and arrange an appropriate alternative.
- For Deaf or Hard-of-Hearing individuals or companions, staff will complete the applicable Customer/Companion Communication Assessment and Auxiliary Aid/Service Record and, when applicable, the Request for or Waiver of Free Communication Assistance form.

5.2 Individuals with Limited English Proficiency

- Staff will take reasonable steps to provide information and services in a language the individual can understand and will notify individuals that language assistance is available free of charge.
- Qualified language assistance may include competent bilingual staff, qualified interpreters, telephone interpretation, or translated written materials, as appropriate to the communication need.
- Minor children will not be used as interpreters. Family members, friends, and untrained volunteers should not be relied upon as interpreters when doing so would not ensure accurate, confidential, and effective communication.

5.3 Individuals with Disabilities

- Staff will identify the individual's communication and accessibility needs before or as early as possible in-service delivery.
- Appropriate support may include qualified or certified sign-language interpreters, CART, relay or video interpreting services, assistive listening devices, large-print or accessible written materials, assistance completing forms, or other reasonable modifications necessary for effective communication.
- For scheduled Deaf or Hard-of-Hearing appointments requiring an interpreter, a certified interpreter will be available at the scheduled time. If the interpreter fails to appear, staff will take additional action to make one available as soon as possible, and no later than two hours after the scheduled appointment.
- For non-scheduled emergency situations requiring an interpreter, staff will make an interpreter available as soon as possible and no later than two hours from the request. For a non-emergency, non-scheduled situation, staff may arrange an appointment with necessary interpreter support at least by the next business day.
- If auxiliary aid or service is ineffective, staff will reassess and select an alternative method that achieves effective communication.

5.4 Reasonable Modifications

- UWLHG will make reasonable modifications when necessary to ensure an individual with a disability has equal opportunity to participate in services and activities.
- Requests and determinations will be handled promptly and documented in the appropriate client or program record.
- If the requested aid or service is not provided, staff must still ensure effective communication through an appropriate alternative and document the determination and alternative provided.

5.5 Documentation and Recordkeeping

- Staff will document identified communication needs, preferred communication method, requests for assistance or modification, services provided, effectiveness of communication, reassessments, waivers or denials when applicable, and future communication needs.
- Records related to auxiliary aids and communication assistance will be retained in the individual's case or program record in accordance with applicable organizational, contractual, and record-retention requirements.
- The designated SPOC or responsible program staff will maintain information necessary for required monitoring and reporting.

5.6 Referral Agency Notification

- When a referral is made, staff will provide advance notice to the referral agency of the individual's or companion's identified need for language assistance, a reasonable modification, and/or auxiliary aid or service, as appropriate and consistent with applicable privacy requirements.
- The referral record will document the referral agency, date of referral, and the communication or accessibility need communicated to the referral agency.

5.7 Notice of Available Assistance

- UWLHG will make information available regarding free language assistance, reasonable modifications, auxiliary aids and services, and nondiscrimination. Appropriate notices will be available at relevant points of contact and through program communications, as applicable.

6. Staff Responsibilities and Training

- Staff are responsible for recognizing potential communication barriers, identifying needs, arranging appropriate assistance, documenting services, and seeking supervisory or SPOC assistance when needed.
- Required civil rights, disability-access, and language-access training will be completed and documented in accordance with applicable contract and DCF requirements.
- The SPOC or designee will support staff with accessibility resources, documentation, reporting, and communication-assistance questions.
- All CFBHN-funded staff must complete the 'Foundations of Disability Rights' training within 30 days of hire and annually thereafter.

7. Monitoring and Compliance

UWLHG will monitor implementation of this policy and maintain records necessary to demonstrate compliance with applicable civil rights and accessibility requirements. Identified deficiencies will be addressed through appropriate corrective action, training, or procedural improvement.

8. References

- Americans with Disabilities Act of 1990 (ADA), as amended.
- Section 504 of the Rehabilitation Act of 1973, as amended.
- Title VI of the Civil Rights Act of 1964, as amended.
- Florida Department of Children and Families, Statewide Auxiliary Aids and Service Plan for Persons with Disabilities and Persons with Limited English Proficiency (2019).

- DCF CFOP 60-16, Methods of Administration for Federal Financial Participation / civil rights requirements, as applicable.
- United Way / CFBHN Subcontract QL155, Amendment 7, Section 68, Accessibility, Reasonable Modifications, Auxiliary Aids and Services, and Language Access.

9. Related Forms / Records

- Customer or Companion Communication Assessment and Auxiliary Aid/Service Record.
- Request for Free or Waiver of Free Communication Assistance.
- Customer/Companion Feedback Form, when applicable.
- Monthly or other required auxiliary-aid/service reporting records, when applicable.

10. Policy Review

This policy will be reviewed periodically and updated when applicable laws, DCF requirements, contractual requirements, organizational procedures, or available accessibility resources change.

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