



# CENTERSTONE

## *Clinical and Administrative Policies and Procedures*

<b>Title of Policy:</b> Auxiliary Aid Plan for Clients with Special Communication Needs	<b>Policy:</b> II.E27.1.CFL
<b>Reviewing Manager:</b> PI/RM Director	<b>Supersedes:</b> 7/20/16
<b>Committee:</b> CPI	<b>Reference:</b>
<b>Manual Section:</b> Rehab Services	<b>Date:</b> 7/18/18
<b>Distribution:</b> Corporate-wide	<b>Approved by:</b> CPI

### **POLICY:**

It is the policy of Centerstone to comply with the deaf and hard of hearing requirements and meet the requirements pursuant to Section 504 of the Rehabilitation Act and the Americans with Disability Act (ADA). Hearing/Language Interpreter services will be provided to all Centerstone clients who have communication problems due to hearing or visual impairments or language barriers. Centerstone staff will be expected to provide interpreter services when directed by their program manager.

### **PURPOSE:**

- A. To reduce communication barriers to ensure access to services and enhance treatment outcomes.
- B. To provide an available pool of necessary resources.
- C. To ensure all clients right to timely treatment.
- D. To ensure compliance with the Americans with Disabilities Act.

**PROCEDURES:**

- A. As part of the initial clinical assessment process, all clients will be screened for speech or hearing impairment or other language barrier. (Refer to Policy # II.E24.1, Client Physical Health Assessment)
  - 1. If such a barrier is suspected and it is determined that the client has never been evaluated for a problem, Centerstone is responsible for arranging such an evaluation.
  - 2. If the client has already had such an evaluation and the communication barrier still exists, then Centerstone staff will arrange for interpreter services. Policy #II.E27.1
  
- B. The Human Resources Department will maintain a current list of staff, volunteers, or community resources, who are bilingual and/or proficient in sign language. This list will be updated at least bi-annually. In addition, Florida Relay Service 800-955-8771 (TDD) is also available.
  - 1. This resource list will be available on the SharePoint site.
  - 2. As part of Centerstone ongoing recruitment efforts, all applicants are surveyed for skills in American Sign Language as well as foreign languages.
  
- C. When it is determined that a client needs language interpreter services, Stratus, Centerstone staff or a person known to the client, should be the first resource activated. Community resources will only be activated when there are no Centerstone staff members with the required skill(s) available. These resources will be arranged through the program manager(s).
  
- D. For all deaf and hard of hearing clients/companions in need of auxiliary aids, these services will be offered at no additional cost as per Federal Law and contractual agreement. Centerstone has assigned a Single Point of Contact (SPOC) who is essentially responsible for maintaining files that document the required information for the deaf and hard of hearing.

- E. Posters containing information about the availability of auxiliary aids and Limited English Proficiency are in all of Centerstone facilities. A list of employees/contacts to be used as a resource for providing assistance can be found on the Centerstone sharepoint site. The posters will include the Interpreter services for the deaf and hard of hearing poster, the DCF Non-Discrimination poster, and the Limited English proficient poster.
- F. All interpreters will be required to sign a Confidentiality Statement (Refer to Policy #II.A.14.1, General Confidentiality and Client Records, Appendices D and E).
- G. It is expected that Centerstone staff will make themselves available to provide needed interpreter services and that program managers will facilitate and support this request/activity wholeheartedly.
- H. Program Managers will coordinate with the Human Resources Department and the Finance Department to establish an hourly rate for vendor reimbursement. All necessary procedures to implement such payment will be followed.
- I. Each program will designate a staff person, who will be responsible for coordinating all requests for interpreter services, and who will obtain the interpreter when consultations or other services are needed. External resources include, but are not limited to:
  - \* Family or friends – Due to the complicated nature of medical services, use of minor children as language interpreters is inappropriate and should be used only in emergency situations until a competent language translator is found. Family members consent for communication must be obtained if using as interpreters.
  - \* Deaf Service Center, with whom Centerstone maintains a current Letter of Agreement.
  - \* Language Bank Directory (access through First Call for Help).
  - \* Contractual arrangements with community-based professionals, who are certified in American Sign Language.

- J. Due to the low incidence of visually challenged clients, accommodations will be made on an individualized basis for such clients seeking services.
- K. We endeavor to keep the Manatee County community informed about services available through Centerstone. Our efforts typically include:
  - 1. Variety of media, including but not limited to: newspapers, various brochures, First Call for Help, speaking engagements, health fairs, etc.
  - 2. In order to accommodate the SunCoast Region policy, Centerstone targets the Deaf Services Center, as well as other relevant support groups. Policy #II.E27.1

#### **Deaf and Hard of Hearing Procedures**

- 1. Designated staff will complete the "Customer/Companion Communication Assessment and Auxiliary Aid/Service Record" form with client/companion to determine the client/companion's preferred method of communication.
- 2. If the client/companion has a scheduled appointment, the preferred method of communication shall be available at the time of the appointment. If for any reason the preferred method of communication is unavailable, a reasonable substitute will be available as soon as possible, but no later than two hours after the scheduled appointment. SPOC or designee will ensure that the preferred method of communication is available within two hours (or no later than twenty-four (24) hours) of a non-scheduled appointment when client/customer is deaf or hard of hearing. If an auxiliary aid or service is found to be ineffective, SPOC or designee shall re-assess to determine an alternative form of communication that will be used in order to ensure the client/companion fully understands the information that is being provided.
- 3. In no event will an auxiliary aid or service to a client or companion who is deaf or hard of hearing be denied. Denial determinations can only be made by the Regional Managing Director or Hospital Administrator or designee or the Contracted Client Services Provider Administrator or designee.
- 4. If auxiliary aid/services are waived then designated staff completes the "Customer or Companion Waiver for Free Interpreter Service" with the client/companion. Please note if aides/services are waived a re-assessment can be completed at anytime (upon customer request or if circumstances change).

5. If auxiliary aid/services are requested they are to be documented in the "Customer/Companion Communication Assessment and Auxiliary Aid/Service Record" form.
6. For each additional contact or referral made on behalf of the client/companion requesting auxiliary aid/services a new "Customer/Companion Communication Assessment and Auxiliary Aid/Service Record" form must be completed unless a communication plan has been developed.
7. All "Customer/Companion Communication Assessment and Auxiliary Aid/Service Record" forms and "Customer or Companion Waiver for Free Interpreter Service" forms must be filed in the chart.
8. Arrangements for Certified interpreters (when requested) will be made for the certified interpreter to be available at the time of the scheduled appointments for Deaf and Hard of Hearing clients/companions. Verification of the interpreter's certification is the responsibility of the agency providing the service. Verification can be obtained from the agency upon request. When a Certified Interpreter is provided, a Customer Feedback form will be given to the client and it will be documented in a progress note.
9. The staff scheduling the appointment will be responsible for scheduling the interpreter if requested. Code T1013 will be used when an interpreter is scheduled for tracking purposes. If appointment needs to be cancelled, the staff cancelling the appointment is responsible for cancelling the interpreter as well.
10. Arrangements for qualified foreign language interpreters (when requested) will be made for the qualified foreign language interpreter to be available at the time of the scheduled appointments for Deaf and Hard of Hearing clients/companions. Verification of the interpreter's certification is the responsibility of the agency providing the service. Verification can be obtained from the agency upon request.
11. To use Florida Relay Service, staff are to dial 7-1-1 or use the following toll free numbers:
  - 1-800-955-8771 (TTY)
  - 1-800-955-8770 (Voice)
  - 1-800-955-3771 (ASCII)
  - 1-877-955-8260 (VCO-Direct)
  - 1-800-955-5334 (STS)
  - 1-877-955-8773 (Spanish)
  - 1-877-955-8707 (French Creole)

12. To use Video Relay Interpreting through Stratus, the Stratus software can be downloaded on staff computer following the directions posted on the CFL Sharepoint Site. Instructions for using Stratus software is also posted on the CFL Sharepoint Site and can be downloaded for staff use.
13. To use the Federal Video Remote Interpreting (VRI) and Video Relay Interpreting (also known as the Federal Video Relay service or VRS) services
  - The Video Remote Interpreting software can be downloaded at [https://www.fedvrs.us/supports/what\\_is\\_vri](https://www.fedvrs.us/supports/what_is_vri), the phone number is 877-689-7775. The service is available Monday through Friday from 7:00 am to 11:00 pm EST, and English to Spanish Translation is available with 24 hour notice.
  - The Video Relay Interpreting software can be downloaded at [www.fedvrs.us](http://www.fedvrs.us), and the service is also available in Spanish. Centerstone does not currently have access to the equipment needed for Video Remote/Relay Interpreting, but can accept phone calls from those individuals who use these items to communicate.
14. Information on Pocket Talkers and Personal Listening Devices can be obtained through SPOC.
15. To use Captioning in Real Time (CART) Services
  - CART providers can be found online at <http://psl.ncra.org/index.asp>. A list of CART providers in Florida can be obtained through SPOC.

Employees of Centerstone are initially trained on the requirements for the deaf and hard of hearing in their orientation when they are hired, but no later than 60 days from the commencement of employment. Refresher training on how to provide assistance to persons who are deaf or hard of hearing, persons with disabilities, and those who are limited English proficient is conducted on an annual basis for all employees with direct client contact.

Centerstone administrative office hours are from 8:30 am to 5:00 pm EST. Centerstone Access Center is available 24/7 at 941-782-4617.

If an employee of Centerstone is assisting a deaf or hard of hearing client/companion and is unfamiliar with an auxiliary aid or service requested, the employee may contact the SPOC or designee, or if the SPOC or designee is unavailable, the employee can reference this policy for guidance.

If Centerstone holds a public meeting, conference, or seminar, an addendum to the documents advertising the events will be added, stating "Pursuant to the provisions of the Americans with

Disabilities Act, any person requiring special accommodations to participate in these meetings is asked to advise the agency at least 72 hours before the meeting by contacting the Administration Office at 941-782-4299 who will contact the SPOC. If you are hearing or speech impaired, please contact the agency using the Florida Relay Service 800-955-8771 (TDD) or 800-955-8770 (Voice).

A link to this policy is posted on the Centerstone website to be available to the public for informational purposes for both individuals and organizations. Printed documents (including this policy) may be made available in alternate formats upon request to assist in ensuring effective communication and will depend upon the client or companion's preferred method.