



## Broward Housing Solutions® (BHS®)

### Auxiliary Aid and Services Plan

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**SUBJECT:** Auxiliary Aid and Services Plan

**PURPOSE:** To ensure that all BHS® Clients are served without regard to age, race, color, national origin or disability. To ensure compliance with the Department of Children & Families services contractual requirements. To ensure compliance with Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and Title II of the American with Disabilities Act.

**SCOPE:** The plan outlined in this operating procedure applies to all employees of BHS® and their clients.

**EFFECTIVE DATE:** At inception of each new client into BHS' Programs.

**ADA/504 COORDINATOR:** Amanda MacCormack, Chief Program Officer

#### **DEFINITIONS:**

**Auxiliary Aids and Services:** Effective methods of making materials available to individuals who are deaf or hard-of-hearing which may include: qualified sign language or oral interpreters, note takers, computer-assisted real time transcription services, written materials, TTY/TDD/711, video and text displays, video interpreting services.

**QUALIFIED INTERPRETER:** Interpreter who is able to interpret effectively, accurately and impartially both receptively and expressively, using a necessary specialized vocabulary.

**LIMITED ENGLISH PROFICIENCY:** Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

**COMPANION:** An individual who is deaf or hard-of-hearing and whom the client indicates should communicate with the service provider on their behalf.

#### **PROCEDURE:**

Broward Housing Solutions® (BHS®) complies with all applicable Federal, State, and Civil rights laws. All services at Broward Housing Solutions are provided without regard to age, race, religion, color, gender, gender identity and expression, sexual orientation, marital status, national origin or citizenship, mental or physical disability, immigration status, language spoken, political beliefs, or any other preference or personal characteristic, condition, or status or any factor which cannot be lawfully used as a basis for service delivery and in accordance to American Disabilities Act. BHS® is committed to take the appropriate steps and provide services to persons with disabilities, including persons who are deaf and hard of hearing or have limited English proficiency and have an equal opportunity to participate in our services, activities, programs and other benefits.



All BHS® staff will be provided a written notice of this policy and procedure, and all staff which have direct contact with individuals with disabilities will be trained in effective communication techniques, including the effective use of interpreters.

BHS® staff will ensure accessibility for all communications; at meetings to persons with disabilities or limited English proficiency, deaf or hard of hearing, including providing necessary auxiliary aids and services for those individuals who are in attendance, by:

### 1. Ensuring Accessibility

- a. BHS® provides notice of the availability for requesting auxiliary aids services through notices in our handbooks, letters, and on our BHS® website (24/7), are available in different formats.
- b. When a client self-identifies as a person with a disability that affects the ability to hear, has limited English proficiency or comprehend requests, staff will immediately consult with the client to determine what specific aids or services are necessary to provide effective communication. If an interpreter is needed, staff shall contact a qualified interpreter from our listing of interpreters and will offer to schedule an appointment in a timely manner, per the following.
  - i. In an emergency situation that is non-scheduled, no later than two hours.
  - ii. In a non-emergency by the next business day.
  - iii. For scheduled events.
  - iv. If the interpreter fails to appear for a scheduled appointment, then an interpreter must be made available no later than two hours after the scheduled appointment time.
- c. Staff shall obtain verification of the interpreter's certification.
- d. Written translation of critical BHS® documents (i.e. Lease Agreements) will be provided free of charge to Client's who have Limited English Proficiency.

### 2. Training

- a. BHS® requires all new staff within 60 days of commencing employment, be trained on how to provide auxiliary aids and services for persons with disabilities and limited English proficiency.
- b. Staff will also complete an annual refresher training on how to provide assistance to persons with disabilities and those who are limited English proficient.

### 3. Effective Communication

- a. All BHS® employees are trained in identifying communication needs for Clients, their Authorized Representatives, and their Companions who assist them with behavioral healthcare treatment and in accessing resources to ensure that effective communication occurs in the provision of services required.
- b. BHS® employees are training the handling of the State Telecommunication Display Device (TDD) telephone calls.
- c. In the event that the initial Auxiliary Aid Service providers are found to be ineffective, BHS® staff is instructed to contact the second Auxiliary Service provider. This shall be accomplished where possible in consultation with the person seeking the auxiliary aids or services.
- d. If BHS® staff or provider determines 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 client, BHS® staff or provider shall advise the person of the denial of the of the requested service and shall document the date and time of the denial, the name and title of the staff member who made the determination, and the basis for the determination. BHS® or provider staff shall provide the client with a copy of the denial.

e. Any BHS® staff who are unfamiliar with the Auxiliary Aid or Service requested shall contact their single point of contact or their supervisor for assistance in locating appropriate resources to ensure effective communication with Clients.

4. Record Retention

a. The original records relating to the Auxiliary Aids and Services provided shall be retained by the BHS® housing department within each client file.


b. All Client records are retained by BHS® for seven (7) years after the duration of services.

**CERTIFIED LIST OF INTERPRETERS:**

BHS® maintains a contact list of certified interpreting agencies that are shared with staff. Where foreign languages interpretation is required, BHS® staff will utilize in-house bi-lingual staff for Spanish, Creole, Italian, and French.

CODA Link Inc. – (954) 423-6893 - 8963 Stirling Road, Suite 6 Cooper City, FL 33328

\*\*Note: Team BHS Senior Management review and update all BHS SOP on an annual basis at the start of each fiscal year, or when changes occur requiring an update, for training and distribution to staff and residents if applicable.

Approved by:  Date: 7/1/2024  
*Amanda MacCormack, Chief Program Officer*