



# **CHILDNET AUXILIARY AIDS PLAN FOR PERSONS WITH DISABILITIES**

**INCLUDING**

**SIGN-LANGUAGE INTERPRETER SERVICES**

**AND**

**LIMITED-ENGLISH PROFICIENCY PLAN**

# ChildNet

## AUXILIARY AIDS PLAN 2018 - 2019

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### **Related ChildNet Policy and Procedure Listing**

- (1) Equal Employment Opportunity Appropriate Conduct Policy, and Complaint Procedure
- (2) Grievances and Appeals Policy and Procedure
- (3) Americans with Disabilities Act Policy and Procedure



## **Auxiliary Aids Plan for Persons With Disabilities and Persons with Limited English Proficiency**

. Purpose. This plan provides ChildNet and contracted providers with guidelines for the provision of auxiliary aids ensuring accessibility to all programs, benefits, and services to persons with disabilities and foreign-language interpreters for persons with Limited-English Proficiency (LEP).

. Scope. The provisions described in this procedure apply to all ChildNet programs and contract providers who provide direct services to customers or potential customers and applicants.

Policy. ChildNet and its contracted providers of customer services will provide appropriate auxiliary aids, including /certified American Sign Language interpreters, to persons with disabilities and qualified foreign-language interpreters to persons with Limited-English Proficiency where necessary to afford such persons an equal opportunity to participate in or benefit from the ChildNet programs and services. Auxiliary aids include, but are not limited to (Communication Access Realtime Translation) CART, Florida Relay Service, Telecommunication Devices for the Deaf (TDDs), Braille and taped materials, certified interpreters, readers, assistive listening devices and systems, television decoders, captioned films and other assistive devices.

a. All qualified and potential customers are entitled to an equal opportunity to use and benefit from the programs and services of ChildNet and its contracted service providers.

1. This includes reasonable accommodations to ensure that programs and services are equally accessible to and equally effective for otherwise qualified persons with disabilities who have hearing, vision or mobility impairments.

2. ChildNet and its contracted service providers will take reasonable steps to provide services and information in appropriate languages, other than English, to ensure that Limited-English Proficient persons are effectively informed and can effectively participate in and benefit from its programs, services and activities.

b. Auxiliary aids or language interpreters will be available for use by customers and potential customers with impaired sensory, manual or speaking skills in each phase of the service delivery process (e.g., telephone inquiries, requests, intake interviews, service delivery, counseling ,complaints, testing, treatment, and training, etc.).

### References.

a. Title VI of the Civil Rights Act of 1964, as amended, 42 United States Code (USC) 2000d et seq; 45 Code of Federal Regulations (CFR), Part 80.

b. Section 504, Title V of the Rehabilitation Act of 1973, as amended, 230 USC 1681 et seq; 45 CFR, Part 80, 84 and 28 CFR Part 41of the Civil Rights Restoration Act of 1987.



- c. Section 508 of the Rehabilitation Act of 1973, as amended.
- d. The Omnibus Budget Reconciliation Act of 1981, as amended, 42 USC 9849 and Civil Rights Restoration Act of 1987, Public Law 100-259.
- e. The Americans with Disabilities Act of 1990, Title I and II as amended.
- f. CFOP 60-16, Civil Rights, Methods of Administration: Equal Opportunity in Service Delivery.
- g. ChildNet's Americans with Disabilities Act (ADA) Accommodation Procedures for Applicants/Employees/General Public.
- h. Department of Health and Human Services, Office of Civil Rights, Policy Guidance – Title VI Prohibition Against National Origin Discrimination As It Affects Persons with Limited-English Proficiency.
- i. Section 110.201(3), Florida Statutes, requires each state agency to comply with all federal regulations necessary to receive federal funds.

#### Definitions.

- a. Applicant for Services. A person seeking services from ChildNet but not yet determined eligible for a program or service.
- b. Assistive Listening Devices and Systems (ALDS). This is amplification systems to improve hearing ability in large areas and in interpersonal communications systems. These systems deliver the desired signal directly to the ears or hearing aids of the listener, thus overcoming the negative effects of noise, distance and echo. Four main types are available: hardwire, loop, infrared, and FM.
- c. Auxiliary Aids and Services. The wide range of services (e.g., sign language interpreters, captioning, Braille, note taking) and devices (e.g. assistive listening systems, page magnifiers, TTYs/TDDs, voice output computer hardware/software, communication boards, speech synthesizers) used to ensure equal access to services and benefits.
- d. Blind. See Visual Impairment.
- e. Captioning (Closed). This refers to converting the spoken word to text displayed in the visual media (videos, television, etc.) in a way that it is available only to individuals whose televisions are equipped with captioning decoders.
- f. Captioning (Open). Refers to converting the spoken work to text displayed in the visual media (videos, television, etc.) so that it is seen by everyone who watches the film (i.e., it cannot be turned off).
- g. Captioning (Real Time). This is when simultaneous conversion of spoken words to text, through computer-assisted transcription or court reporting, and displaying that text on a video screen. This communication service is beneficial to individuals with



hearing impairments that do not use sign language or for whom assistive listening devices and systems are ineffective.

h. Customer. As used in this Plan, this term means anyone applying for or participating in ChildNet's services or activities. It includes persons making general inquiries or in any way seeking access to or receiving information from ChildNet and contracted service providers, either in person, in writing or via telecommunications.

i. Communication Disabilities. A comprehensive term which includes hearing impairment, speech impairment (for aural, oral communication), visual impairment, or other disabilities that present an impairment to reading (for written, visual communication).

j. Contract Monitoring Unit. The ChildNet CQI Contract Monitoring unit is responsible for monitoring the administrative and programmatic terms and conditions of ChildNet's subcontractors who deliver services for which they are being funded for.

k. Deaf. A term used to describe a person having a permanent hearing impairment and being unable to discriminate speech sounds in verbal communication, with or without the assistance of amplification devices.

l. Department of Children and Families. The Department of Children and Families (DCF) is the Florida state agency charged with the responsibility of protecting children from child abuse and neglect.

m. Disability. A condition that substantially limits a major life activity, such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, lifting, sleeping, and working.

n. Dual Sensory Impairment. A term used to describe a person having both a visual impairment and a hearing impairment. The term includes all ranges of loss, which would necessitate the use of auxiliary aids and services for communication.

o. Employee. This includes all persons working for ChildNet.

p. Florida Relay Service. The Florida Relay Service is a service offered to all persons in the state which enables a hearing person to communicate with a person who is hearing or speech impaired and must use a TDD/TTY, through a specially trained operator called a communications assistant.

q. Hard of Hearing. A term used to describe a person having a permanent hearing impairment, which is severe enough to necessitate the use of auxiliary aids or services to discriminate speech sounds in verbal communication.

r. Health and Human Services. The Department of Health and Human Services, through the U.S. Office of Civil Rights, promotes and ensures that people have equal access to and opportunity to participate in and receive services in all Health and Human Services programs without facing unlawful discrimination.

s. Health Insurance Portability and Accountability Act (HIPAA). This Federal law protects individual's medical records and other personal health information.

t. Hearing Impairment. This is an all-inclusive term to describe any hearing loss. A person with a hearing impairment could be either deaf or hard of hearing.

u. Interpreter. An individual who is qualified to convert one spoken language into another—or, in the case of sign-language interpreters, between spoken communication and sign language.

v. Manager. As used in this plan, this term means a ChildNet or provider employee at the supervisory level or above who is responsible for supervising staff or a Departmental/provider function and for the physical space in which such staff or program operates.

w. Manual Disability Impairment. A term used to describe a condition, which limits or prevents the use of a person's upper extremities (arms, hands).

x. Mental Disability Impairment. The Americans with Disabilities Act (ADA) defines this term to include mental or psychological disorders such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

y. Mobility Impairment. For the purpose of this procedure, this term is used to describe a condition that substantially limits a person's upper or lower body mobility. It includes those persons who have limited use of arms, shoulders; persons who are in wheelchairs or on crutches; people of short stature; those who cannot perform certain hand movements or have difficulty controlling movement; and people with breathing difficulties or stamina limitations. It also includes person with visual impairments.

z. Physical Disability. This is a broad term, which includes physiological disorders or conditions, cosmetic disfigurement and anatomical loss. It includes orthopedic, visual, speech, and hearing impairments, cerebral palsy, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, HIV disease (symptomatic or asymptomatic), tuberculosis, drug addition and alcoholism.

aa. Print Impairment. An organic condition or disability that leads to an inability to use traditional printed material (10-12 point print). This term includes persons with visual impairments, physical disabilities that results in an inability to hold or turn pages of a book (e.g., arthritis, cerebral palsy, muscular dystrophy, multiple sclerosis, stroke, paralysis, amputation), and learning disabilities (e.g., dyslexia).

bb. Program accessibility. An American with Disabilities Act (ADA) standard, which means a public entity's programs, services, or activities, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities. The concept of program accessibility is intended to make the contents of the program, service or activity equally available and accessible to persons with disabilities without excessive renovations of facilities. [See also: "Undue Burden".]

cc. Qualified Interpreter. The Americans with Disabilities Act defines qualified interpreter as a person who is able to interpret effectively, accurately, and impartially both receptively (i.e., can understand what both persons in the conversation are signing





and saying) and expressively (i.e., can then sign or say to the other person what it is being said or signed), using any necessary specialized vocabulary.

dd. Staff. As used in this plan, defines all employees of the ChildNet other than managers.

ee. Sensory Impairment. This is a general term, which is used to describe impairment of vision or hearing. For the purpose of this document, it also includes impairment of speech.

ff. Translator. Individuals qualified to convert written materials from one language into another.

gg. TTD/TTY/TT. Terms used to designate a text telephone, a typewriter-like device used to transmit conversations across telephone lines. In this document, this device will be referred to as a TDD/TTY.

hh. Undue Burden. This term, used in conjunction with programs and services (ADA Title II), means an unreasonably excessive financial cost or administrative inconvenience in making alterations to building or facilities in which programs, services or activities are conducted, in order to ensure equal benefit to persons with disabilities.

NOTE: Program access requirements of ADA Title II should enable individuals with disabilities to participate in and benefit from the programs, services and activities of public entities in all but the most unusual cases. Determination of undue burden can be made only by the agency head or his/her designee, after considering all resources available for use in the funding and operation of the program.

ii. Visual Impairment. A generic term used to describe any loss of vision.

#### Accountability.

a. The Community Based Care Lead Agency, ChildNet, is responsible for the implementation of the Auxiliary Aids and Limited English Proficiency Plan. Local resources have been appended to this Plan. This Plan and training of the Plan must be provided to all staff to ensure they have the necessary tools for the provision of assistive devices, certified sign language interpreters or readers and physical modifications to ensure the accessibility of programs and services to clients or potential clients with sensory (hearing and sight), speaking or mobility impairments as well as foreign-language interpreters to customers or potential customers with limited-English proficiency.

b. The Director of Human Resources is the designated Title VI, Title II ADA and Section 504 Coordinator for ChildNet. The Director of CQI is responsible for the coordination, development and implementation of ChildNet procedures ensuring the nondiscriminatory delivery of equally effective and equally accessible quality services. All ChildNet and contracted providers' employees are responsible for ensuring equal accessibility and equally beneficial services to all customers and potential customers of ChildNet.

#### Dissemination.



Copies of ChildNet plans are maintained and distributed upon request to individuals or organizations serving persons with disabilities or Limited-English Proficient. Copies in alternative format will be provided upon request to all supervisors at ChildNet to distribute to their staff and clients.

#### Revisions.

The Auxiliary Aids Plan and Limited-English Proficiency Plan will be updated as needed, but at least annually, with a copy of all changes submitted to the Director of Human Services by July 31 of each year.

Ensuring Accessibility. The following procedures are to be followed by employees and contracted services providers to ensure accessibility of programs and services to customers or potential customers with disabilities or Limited-English Proficiency:

a. Assess customer needs by consulting with the customer or potential customer concerning his or her preferred communication mode, and if applicable with assigned caseworkers, counselors, parents, family members, guardians or other representatives.

(1) For customers with hearing impairment/deafness, staff is required to determine, prior to providing services, the method of communication that the customer feels most comfortable with, and record this information in the customer's file.

(2) For customers who are limited English proficient (LEP), staff shall identify at first contact, the preferred language including dialect of each customer, and record this information in the customer's file.

b. The communication options for hearing impaired persons may include but not be limited to the Florida Relay Service, TDDs (Telecommunication Devices for the Deaf), FAX (Telephone Facsimile Transmittal), phone amplifiers, ~~qualified~~/certified sign language interpreters, flash cards, lip-reading, written notes, supplementary hearing devices, charts, signs or a combination of these, as appropriate.

c. ChildNet or contract provider's official (or designate) with budget approval over the unit or facility has the responsibility for approving the request and obtaining the appropriate auxiliary aid or interpreter.

d. Auxiliary aids or interpreters will be provided within five days of request or as otherwise required. Delaying services is not always practical or appropriate; therefore, provision will be made when advance notice for an auxiliary aid or interpreter is not given. Client files will be documented to indicate if an auxiliary aid or interpreter is needed and subsequent referrals will be notified in advance of customer's needs.

e. The use of auxiliary aids, certified sign-language interpreters, translators, or foreign-language interpreters will be at no cost to the customer or applicant for services. Auxiliary aids or interpreter services will normally be obtained within ChildNet or provider's current resources, ~~including the use of certified/qualified staff, volunteers and volunteer organizations.~~ However, if an auxiliary aid or an interpreter is required and services must be purchased, payment will be made from the appropriate program operating budget.



(1) Language services include, as a first preference, the availability of qualified bilingual staff that can communicate directly with customers in their preferred language (see 3-17).

(2) When bilingual staff is not available, the next preference is face-to-face interpretation provided by qualified contract or volunteer language interpreter.

(3) Telephone interpreter services should be used as a supplemental system when an interpreter is not available, or when services are needed for an unusual or infrequently encountered language.

(4) Sign language interpreters must be certified (See 3-17 regarding certification/qualifications requirements for employees).

f. Minor children should never be used as interpreters or be allowed to interpret for a parent.

g. The use of assistive devices (vibratory alarms) will be incorporated with relevant services (tactile communication) for persons with multiple disabilities such as deafness and blindness.

h. If the individual declines the use of the free foreign language or sign language interpreter, or other auxiliary aids, the customer's files must be noted and the declination documented. **(See Forms.)**

Identifying language trends. To ensure meaningful access to all ChildNet programs and services, each program office and contracted provider will identify language trends by:

a. Identifying the non-English languages that are likely to be encountered in its programs and estimating the numbers of LEP persons eligible for services that are likely to be affected by its program. This can be done by reviewing census data, client utilization data, and community's organizations. The estimate should be used as a guide for employee recruitment.

(1) Informing customers of the purpose for collecting data on race, ethnicity and language,

(2) Emphasizing that such data is confidential and will not be used for discriminatory purposes,

(3) A customer does not have to provide the information if he or she chooses not to provide such information, unless required by law,

b. Identifying the points of contact in the program or activity where language assistance is likely to be needed; and

c. Identifying resources needed, location and availability of these resources.

d. Reporting the identified language needs to the Director of Human Services at ChildNet.

Meetings/Conferences/Facilities Accessibility. The following are procedures and minimum requirements for ensuring accessibility of meetings, conferences and seminars to persons with sensory, speech or mobility impairments or Limited-English Proficient:

a. Facilities used for meetings, conferences and seminars will be reviewed for accessibility by the unit sponsoring the activity in coordination with the designated Section 504/Title II ADA Coordinator.

b. When meetings, conferences and seminars are scheduled, information will be included in the advertisements, conference registration materials or meeting notices that sensory impaired, hearing impaired or limited-English proficient participants will be provided with necessary auxiliary aids or interpreters at no cost to themselves. The information will include the name of a contact person and a date by which the person must request such assistance. The registration process will include a method for determining the number and type of persons with disabilities or limited-English proficient needing assistance as well as the type of personal assistance or accommodation requested.

c. The following provisions are required if sensory, speech, hearing, mobility impaired or limited-English proficient persons plan to attend the specific meeting, conference or seminar:

(1) Certified interpreters for hearing or speech impaired persons and accessibility to Teletype (TDD) equipment. NOTE: When telephones are provided for use by participants or residents (customers, employees or the public), TDDs must be provided for participants or residents who are deaf.

(2) Adequate lighting in meeting rooms so signing by interpreter can be readily seen.

(3) Readers or cassette recordings to enable full participation by vision impaired persons.

(4) Interpreters for limited-English proficient persons.

(5) Agenda and other conference materials translated into usable form for visually and hearing impaired or limited-English proficient participants.

(6) Parking spaces clearly marked with appropriate ramps and curb cuts will be provided for persons with disabilities.

(7) Where parking is available on or adjacent to the site, one 96" wide space with a 60" access aisle shall be set aside for the car of each mobility-impaired participant requesting it in advance of the meeting. Two accessible parking spaces may share a common access aisle.

(8) Where parking is not available on or adjacent to the site, valet parking or other alternative accommodations for mobility impaired participants will be provided.

(9) Entrance ramps will be available and appropriate (36" wide or wider, level with adjacent surface and a manageable slope or incline of no more than one inch rise per foot, 1:12).

(10) Meeting rooms will be all on one level or capable of being reached by elevators or ramps that can be independently traversed by a mobility-impaired participant.

(11) Stages, platforms, etc., to be used by persons in wheelchairs will be accessible by ramps or lifts.

(12) Seating arrangements for persons in wheelchairs will be adapted to integrate mobility-impaired persons rather than to isolate them on the group's perimeter.

(13) One unobstructed entrance to each facility.

(14) Doors operable by single effort.

(15) Door handles no more than 48" from floor.

(16) Elevator provided if over one story:

(a) Sensitive safety edges provided.

(b) Controls no more than 48" from floor.

(c) Controls with Braille numbers or letters.

(d) Accommodates wheelchair 29" X 45".

d. Rest rooms accessible to mobility impaired.

(1) Level access for each sex on each floor.

(2) Turnaround space 5' X 5'.

(3) Door clearance of 32".

(4) Grab rails provided.

(5) Shelves, racks, dispensers, etc., not more than 48" for forward reach or 54 " for side reach.

(6) Rest room signs indicating accessibility.

e. Wheelchair accessible telephones.

f. Accessible drinking fountains with cup dispensers.

g. Audible and visible fire alarms.

. Notification. ChildNet's Nondiscrimination Policy and Hearing-Impaired posters will be displayed in buildings' main entrances, lobby areas, waiting areas, and bulletin boards. The name, telephone number, and TDD number for the **Title II ADA/504 Coordinator** will be listed on the hearing-impaired poster to assure accessible services to customers, potential customers, or their representatives. Descriptive information on the availability of auxiliary aids and reasonable accommodations to persons requiring assisting devices or aids will be included in announcements related to meetings, seminars, workshops and conferences, as well as to services offered by ChildNet and its contracted service providers.

. Training.

a. New employee orientation will include training on Title II ADA and Section 504.

b. All staff will be trained annually on how to assist sensory and mobility impaired or limited-English proficient customers in obtaining assisting devices and/or aids, or other reasonable accommodations. This training is mandatory and will be tracked. Training will include:

(1) Procedures for serving hearing-impaired, sight-impaired, mobility impaired, and limited-English proficient customers and potential customers.

(2) Awareness of hearing impairments and deafness; speech impairments; sight impairments and blindness; reading impairments and dyslexia; and mobility impairments.

(3) Communication options available.

(4) How to provide reasonable accommodations for qualified customers and potential customers i.e., how to access or purchase auxiliary aids, interpreter services and physical modifications.

(5) Requirements for making meetings, conferences and services accessible.

(6) Awareness of the Auxiliary Aids and Limited-English Proficiency Plans, including how to access the Plans for reference.

. Documentation/Record Retention.

a. Records relating to the Auxiliary Aids and Limited-English Proficiency Plans, such as copies of materials used in training, including brochures used for customers of ChildNet nondiscrimination policy will be documented and maintained for three years by the Human Resource Director at ChildNet for the subject program or service provider. ChildNet will follow the Department of Children and Family's CFOP 15-4, Records Management, which governs the retention and destruction of records.

b. All finalized requests for accommodations with relevant documentation will be forwarded to the Human Resource Director.

Compliance Monitoring.

a. Monitoring will be accomplished through annual updates, surveys, compliance reviews, complaint investigations, and other related civil rights activities.

b. Monitoring the provision of auxiliary aids to customers or potential customers with hearing impairments, including the use of certified interpreters in all phases of service delivery, shall be conducted annually, by ChildNet's Director of Human Resources. This will include an assessment to ensure meaningful access to all ChildNet programs and services.

3-16. Translation of Written Materials. Written material (vital documents) routinely provided in English to applicants, customers and the public are to be available in regularly encountered languages other than English. It is vital that documents be identified and translated into the non-English language of each regularly encountered limited English proficient group eligible to be served or to be directly affected. Each program office will make sure non-English written materials, such as program forms, brochures, etc., are available to operational staff.

Competency of Interpreters and Translators.

a. Certification of foreign language interpreters is not required; however competency requires:

- (1) demonstrated proficiency in both English and the other language
- (2) fundamental knowledge in both languages including any specialized terms or concepts peculiar to the program or activity
- (3) sensitivity to the person's culture
- (4) a demonstrated ability to convey information in both languages, accurately.

It is the responsibility of program managers and supervisors to ensure the competency of foreign-language interpreters.

b. ChildNet or contract providers' employees who are utilized to interpret for the hearing impaired by American Sign Language (ASL) shall meet or exceed the education and communications skills established by this Plan.

c. An assessment of an individual's interpreting skills is required to determine their level of competency prior to their interpreting for customers with hearing impairments. Four levels of competency have been identified: apprentice, provisional, provisional +36 credit hours, and proficient. To achieve a level, the interpreter must meet established criteria. Each level has a specific duration period and requirements for maintaining the level.

d. All current employees desiring to interpret for hearing impaired customers will have two (2) years to achieve the credentials required for the apprentice level of interpreting.



e. Interpreter Standards developed by the Florida Department of Education and modified for DCF use are incorporated by reference into this Plan and are attached as Appendix A to this Plan.

f. It is the responsibility of managers, supervisors, and staff to familiarize themselves with and follow standards of etiquette when communicating with customers with physical or sensory disabilities and/or limited English proficiency.



## In-Person Communication/Etiquette

### 1. INTERACTING WITH INDIVIDUALS WHO ARE DEAF

Deaf individuals have many different communication needs. People who were born deaf (pre-lingual deaf) may have more difficulty with speech than those who lost their hearing after they learned a language (post-lingual deaf). The way a person communicates will vary according to the environment in which he or she was raised, type of education received, level of education achieved, and many other factors. Their ability to communicate in a language will vary from not very well to very well.

Some individuals use American Sign Language (ASL) or other sign language; some read lips and speak as their primary means of communication; some use Signed Exact English (SEE), where every word is signed in the exact sequence it is spoken in English, and there is a vocabulary which has a one-to-one relationship to English words. People who became deaf later in life may never have learned either sign language or lip-reading. Although they may pick up some signs and try their best to read lips, their primary means of communicating may be reading or writing.

Lip-reading ability varies greatly from person to person and from situation to situation. It is greatly hindered by people who do not enunciate clearly, have mustaches shielding the lips, do not look directly at the person, or who speak with accents that affect the way the words appear on the lips. Therefore, when speaking with a person who reads lips, look directly at the person while speaking, make sure you are in good light source, and keep your hands, gum and food away from your mouth while you are speaking.

**When to use Interpreters:** Since communication is vital in the workplace and in service delivery, and the person who is deaf knows how he or she communicates best, supervisors and staff should follow the wishes of the person who is deaf regarding communication methods.

In casual situations and during initial contact, it is often acceptable to write notes to determine what the person needs. However, department policy is to use nothing less than a certified interpreter for service delivery.

### 2. INTERACTING WITH INDIVIDUALS WHO ARE HARD OF HEARING

Persons who are hard of hearing may or may not know how to sign, and their means of communication will depend on the degree of hearing loss, when they became hard of hearing, etc. A person who is hard of hearing may or may not wear a hearing aid. Employees should be aware that many hard of hearing people will not admit having a hearing loss, so it is important employees be alerted to the **signs of hearing loss:**

- The person asks you to repeat yourself several times; and

- The person does not respond appropriately, especially if you have been talking with your back to them.

The key to communication with a person with a hearing impairment – as with all people – is patience and sensitivity. Please use the following guidelines:

- Ask the person how he or she prefers to communicate.
- If you are using an interpreter, the interpreter may lag a few moments behind what is being said, so pause occasionally to allow time for a complete translation.
- Talk directly to the person, not the interpreter. However, the person will look at the interpreter and may not make continuous eye contact with you during the conversation.
- Before you speak, make sure you have the attention of the person you are addressing.
- If you know any sign language, try using it. It may help you communicate and at least demonstrates your interest in communicating and willingness to try.
- Speak clearly and distinctly at a moderate pace in a normal tone of voice, unless asked to raise your voice. Do not shout or exaggerate your words.
- Look directly at the person. Most people with hearing impairments need to watch a person's face to help them understand what is being said. Do not turn your back or walk around while talking. If you look away, the person may assume the conversation is over.
- Do not put obstacles in front of your face.
- Do not have objects in your mouth, such as gum, cigarettes, or food.
- Do not turn to another person in their presence to discuss them and their problems.
- Write notes back forth, if feasible.
- Use facial expressions and gestures.
- Do not talk while writing, as the person cannot read your note and attempt to read your lips at the same time.
- Use a computer, if feasible, to type messages back and forth.
- Offer to provide an assistive listening device.
- If the person has a service animal, such as a dog, do not divert the animal's attention. Do not pet or speak to the animal.

### 3. INTERACTING WITH INDIVIDUALS WITH SPEECH IMPAIRMENTS

Be tolerant and sensitive to persons with speech impairment. Please use the following guidelines:

- Give the person your undivided attention.
- If you have trouble understanding someone's speech, ask him or her to repeat what he or she has said. It is better for the person to know you do not understand than to assume that you do.
- Do not simplify your own speech or raise your voice. Speak in a normal tone.
- Write notes back and forth or use a computer, if feasible.
- Ask for help in communicating. If the person uses a communicating device, such a manual or electronic communication board, ask the person how to use it.

### 4. INTERACTING WITH INDIVIDUALS WITH PHYSICAL DISABILITIES

As with all people, persons with physical disabilities have specific needs. Please use the following guidelines when communicating with a person with mobility or physical impairment:

- Do not make assumptions about what the person can or cannot do. Always ask if the person would like assistance before you help. Your help may not be needed or wanted.
- Do not touch a person's wheelchair or grab the arm of a person walking without first asking if he or she would like assistance.
- Do not hang or lean on a person's wheelchair because it is part of the wheelchair user's personal space.
- Never move someone's crutches, walker, cane, or other mobility aid without permission.
- When speaking to a person in a wheelchair for more than a few minutes, try to find a seat for yourself so the two are at eye level.
- Speak directly to the person in a wheelchair, not to someone nearby as if the wheelchair user did not exist.

- Do not demean or patronize the wheelchair user by patting him/her on the head.
- Do not discourage children from asking questions about the wheelchair. Open communication helps overcome fearful or misleading attitudes.
- When a wheelchair user “transfers” out of the wheelchair to a chair, toilet, car or bed, do not move the wheelchair out of reach.
- Do not raise your voice or shout. Use normal speech. It is Ok to use expressions like “running along”. It is likely that the wheelchair user expresses things the same way.
- Be aware of the wheelchair user’s capabilities. Some users can walk with aid and use wheelchairs because they can conserve energy and move about quickly.
- Do not classify persons who use wheelchairs as sick. Wheelchairs are used for a variety of non-contagious disabilities.
- Do not assume that using a wheelchair is in itself a tragedy. It is a means of transportation/freedom that allows the user to move about independently.

## 5. INTERACTING WITH PEOPLE WHO ARE VISUALLY IMPAIRED

Persons with visual impairments have specific needs. Please use the following guidelines when communicating with persons who are blind or have a visual impairment:

- The first thing to do when you meet a blind person is to identify yourself.
- When speaking, face the person directly. Speak in a normal tone. Your voice will let the person know where you are.
- Do not leave without saying that you are leaving.
- Some individuals who want assistance will tell you. You may offer assistance if it seems needed, but if your offer is declined, do not insist.
- When offering assistance, say, “Would you like to take my arm?” and allow the person to decline or accept. The movement of your arm will let the person know what to expect. Never grab or pull the person.

- When going through a doorway, let the person know whether the door opens in or out and to the right or left.
- Before going up or down stairs, let the person know that you are going up or down, and advise if there is a handrail and where it is. Ask the person if he or she would like assistance – he or she would let you know.
- When giving directions, or describing where things are in a room or in the person's path, be as specific as possible, and use clock clues where appropriate.
- When directing the person to a chair, let the person know where the back of the chair is, and he or she will take it from there.
- If the person has a service animal, do not distract or divert the animal's attention. Do not pet or speak to the animal unless the owner has given you permission.
- The person's single greatest communication need is to have access to visual information by having information either read or provided in an accessible format (Braille, audio).

## 6. INTERACTING WITH PEOPLE WITH DUAL SENSORY IMPAIRMENTS

The means of communication with a person with dual sensory impairments will depend on the degree of hearing and vision loss. Use all of the suggestions in the above sections on hard of hearing and visual impairments. The person with dual sensory impairments has unique and very challenging communications needs. Staff is to use every possible means of communication available.

## 7. INTERACTING WITH PEOPLE WITH LIMITED-ENGLISH PROFICIENCY

Many people who are eligible for services cannot effectively use those services because they are not proficient in English. Language barriers prevent us from effectively serving a large number of people. Breaking down these barriers will allow individuals with limited English proficiency to participate in the programs administered by the Human Resources Department at ChildNet.

The way a person with Limited-English Proficiency communicates in English will vary from no English, to a little English or to very well. Use the following guidelines when communicating with a person with Limited-English Proficiency:

Ask the person if he/she needs a translator.



If you are speaking through an interpreter, remember the interpreter may lag a few moments behind what is being said, so pause occasionally to allow time for a complete translation.

Talk directly to the person, not the interpreter. However, the LEP person may look at the interpreter and may not make eye contact with you.

If you know a little of the language, try using it. It may help you communicate and least demonstrates your interest in communicating and willingness to try.

Do not simplify your speech or raise your voice. Speak in a normal tone.

The person's single greatest communication need is to have access to the information by having the information either orally translated or provided in their language written form.

Be patient and sensitive to the needs of the LEP person.



## REASONABLE ACCOMMODATION REQUEST FORM

(Americans with Disabilities Act and Section 504 of the Rehabilitation Act)

Requester's Name: \_\_\_\_\_ Date Request Received: \_\_\_\_\_

Home Phone: ( ) \_\_\_\_\_ Work/Cell Phone: ( ) \_\_\_\_\_

Address: \_\_\_\_\_  
Street Apt. # City State Zip

☐ I am currently employed by ChildNet and request a reasonable accommodation. My current job title is: \_\_\_\_\_

☐ I am applying for employment. The accommodation requested will allow me to participate in the interviewing process or assessment for: (position title) \_\_\_\_\_

☐ I am requesting accommodation that will allow me to participate in the Agency's program activity or service. Activity/Service: \_\_\_\_\_

Please answer the following questions to assist the agency with understanding the basis and nature of your request for an accommodation. The information you provide will be treated confidentially and will be handled on a need-to-know basis.

1. Describe the accommodation needed which will enable you to perform the essential functions of the position, participate in the interviewing process/assessment or the Agency's program activity/service.

\_\_\_\_\_  
\_\_\_\_\_

2. Describe the disability that limits one or more of your major life activities: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. Describe how this accommodation will assist you: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

The attached documentation provided by my health care provider (if necessary) certified the need for the requested accommodation.

\_\_\_\_\_

**FOR CHILDNET'S USE ONLY**

Accommodation provided: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date accommodation was provided: \_\_\_\_\_ By: \_\_\_\_\_

Position Title: \_\_\_\_\_ Phone Number: \_\_\_\_\_

Date and method requester was notified of approved accommodation: \_\_\_\_\_

If accommodation was not provided, please explain: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

I, \_\_\_\_\_ notified ChildNet's Director of Talent Management prior to denial

of accommodation request on \_\_\_\_\_.

\_\_\_\_\_  
Date request sent to the Director of Talent Management, ChildNet