



Auxiliary Aids and Services Plan Summary

Hubbard House, Inc. shall comply with Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. 794, as implemented by C.F.R. Part 84 (hereinafter referred to as Section 504), and the Americans with Disabilities Act of 1990, 42 U.S.C. 12131, as implemented by 28 C.F.R. Part 35 (hereinafter referred to as the ADA).

This plan can be made available in alternative formats upon request by staff, volunteers, or participants. This plan will be available to persons and agencies working with people living with a disability or who are Limited English Proficient and will be available via the Hubbard House website.

Non-Discrimination Policy:

Hubbard House, Inc. does not, and shall not, discriminate in any aspect against a person because of race, color, religion, age, national origin, mental or physical disability/disability status, sex/gender, pregnancy, military status/status as a veteran, genetic information, citizenship, immigration status, marital status, sexual orientation, gender identity, gender expression, limited English proficiency, language spoken, or other legally protected status.

Signage:

The Hubbard House, Inc. Single Point-of-Contact will ensure that conspicuous notices which provide information about the availability of appropriate auxiliary aids and services at no cost to deaf or hard-of-hearing customers or companions are posted near where people enter or admitted at all Hubbard House direct service locations. The names and contact information for the Single Point-of-Contact for Hubbard House, Inc., and the Section 504/ADA Coordinator (Civil Rights Officer) for the Northeast Region are included on each Deaf and Hard-of-Hearing poster.

Single Point-of-Contact:

The Hubbard House, Inc. Single Point-of-Contact, Brandi Skipalis, will ensure effective communication with Deaf or Hard-of-Hearing customers or companions in accordance with Section 504 and the ADA. The Hubbard House, Inc. Single Point-of-Contact shall ensure that employees are aware of the requirements, roles, responsibilities, and contact points associated with compliance with Section 504 and the ADA.

Staff and Volunteer Training:

Staff and direct service volunteers shall receive training on Section 504 and the ADA, and on how to provide auxiliary aids and services for persons with disabilities and persons with limited English proficiency (LEP), within 60 days of commencing employment or direct service volunteering and annually thereafter. Staff and volunteers who work with the 24-hour domestic violence hotline shall be trained to use the TTY telephone and on making video relay calls during orientation and annually thereafter. Training documentation shall be maintained in each employee's and volunteer's training file.

Event Accommodations:

Hubbard House, Inc. facilities and venues are accessible, and we will provide accommodations, including foreign language interpreters, American Sign Language interpreters, assistive listening devices, alternative formats of printed materials, and real-time captioning, upon request for persons who are deaf, hard of hearing, or are living with disabilities, or for persons who are limited English proficient. To ensure that you receive the necessary accommodations, please make your request no later than 7 days prior to the event to accommodations@hubbardhouse.org so that they can be available to you from the start of the event.

Serving Limited English Speaking Survivors:

Hubbard House, Inc., has two key policies that provide guidance for serving survivors with Limited English Proficiency: 1) Non-Discrimination Policy (U-4); and 2) LEP Policy Access / Language Assessment Plan / Interpretation & Translation Services (U-5). We are committed to providing information and referrals and essential services to all program participants and visitors with limited English proficiency regardless of race, color, national origin, citizenship, immigration status, language spoken, religion, age, mental or physical disability/disability status, sex/gender, pregnancy, military status/status as a veteran, genetic information, marital status, sexual orientation, gender identity, gender expression, or other legally protected status.

Staff are to provide interpretation for all essential services upon request. Interpretation will be available 24 hours a day, 7 days a week. Staff and program participants have two key options for foreign language interpretation:

- 1) Optimal Phone Interpreters (OPI) is a telephone interpretation service which can be used for calls to the 24-hour emergency hotline OR for in-person communication with program participants. In addition to using this service for hotline calls, the use of a telephone interpretation service is particularly recommended for unscheduled appointments, including intakes, for which time is a factor, or when there is no in-person interpreter available who speaks the program participant's language.
- 2) Hubbard House, Inc. has an account with America's Center for Translators (ACT) to provide in-person interpreter services as needed. Staff can book interpreters through the ACT website for all appointments more than 48 hours away, or by phoning ACT if the interpreter is needed within the next 48 hours.

Additionally, vital documents (enrollment forms, safety plans, service plans, release of information forms, client surveys, applicable consent forms, support group materials, program participant handbook/rules, program participant grievance procedures, non-discrimination policy) will be translated into regularly encountered languages in the service area. Oral interpretation of documents is also available.

Serving Survivors with Disabilities:

Hubbard House, Inc. is committed to ensuring accessibility for all program participants, visitors, volunteers, and staff with disabilities. Hubbard House has policies and procedures in place to ensure accordance with Title III of the American Disabilities Act, Section 504 of the Rehabilitation Act, and the Fair Housing Amendments Act regarding the admittance of service animals that are trained to perform tasks for an individual with a disability.

Provision of Auxiliary Aids and Services for Deaf or Hard-of-Hearing Survivors:

Hubbard House, Inc. will recognize at all times that the program participant or companion's preference is the primary consideration in determining what auxiliary aids or services to provide. If communication through a specific auxiliary aid or service is deemed to be ineffective, staff will ask the program participant or companion to determine a more

effective auxiliary aid or service for communication. Documentation shall be made in the program participant's file regarding the attempt to improve the effectiveness of auxiliary aids and services.

Staff who are unfamiliar with a requested auxiliary aid or service should contact the SPOC, the Northeast Region Civil Rights Officer, or their supervisor for assistance in locating appropriate resources to ensure effective communication with program participants and their companions who are deaf or hard-of-hearing.

If a program participant or companion is deaf or hard-of-hearing, Hubbard House staff shall obtain the requested auxiliary aids or services as specified in the communication assessment. All ASL interpreters' certifications shall be verified. This can be done via the Florida Registry of Interpreters for the Deaf at <http://www.fridcentral.org>.

Providing Interpreters in a Timely Manner:

Interpreters are to be provided in a timely matter as needed, 24 hours a day, 7 days a week. All interpreter services listed below are accessible after normal business hours.

Scheduled Interpreter Requests:

For scheduled appointments and events, staff shall make a certified interpreter available at the time of the scheduled appointment. If an interpreter fails to appear for the scheduled appointment, staff shall take whatever additional actions are necessary to make a qualified interpreter available to the customer or companion who is deaf or hard-of-hearing as soon as possible within two (2) hours of the appointment time. If an in-person interpreter is unavailable within that time frame, video remote interpreting is recommended.

Non-Scheduled Interpreter Requests:

For non-scheduled emergency situations, staff shall make an interpreter available as soon as possible, and not more than two hours from the time the request is made by a program participant or her or his deaf or hard-of-hearing companion. If an in-person interpreter is unavailable within that time frame, video remote interpreting is recommended.

If the situation is not an emergency, staff shall offer to schedule an appointment for no later than the next business day at the convenience of the customer or companion, providing an interpreter where necessary for effective communication.

Providing Auxiliary Aids and Services:

Interpreter Services:

ASL Associates: <http://aslassociates.org> Office: 904-288-6753; Fax: 904-309-9890; 24-Hour Pager: 904-231-0606; FRID Member Number: 5445624

Opportunity Development, Inc./ILRC/Independent Living Resource Center of Northeast Florida: <http://www.cilj.com> Office: 904-399-8484; Pager: 904-499-6953

Video Remote Interpreting:

Accessible Communication for the Deaf (ACD) Video Remote Interpreting: <http://acdvri.com/> ;
<http://www.acdterps.com/index.php> Phone: 954-578-3081; Emergency line (after 5:00PM): (954) 347-5749; Video
Phone: 954-519-2975; FRID Member Number: 7576200

Video Relay Service:

Sorenson Video Relay (<http://www.sorensonvrs.com/>)

Outgoing calls by a deaf or hard-of-hearing program participant who signs in ASL may be made through Sorenson Video Relay using either a video relay service videophone or a webcam connected to a Windows computer that has the nTouch PC video relay service software installed. Sorenson only provides this service for free to deaf and hard-of-hearing individuals on an individual basis, so if a participant requests this service, staff should contact the SPOC, who will contact Sorenson Video Relay to request this service for the participant for use on a PC with webcam.

Many deaf program participants with smartphones may also have access to Sorensen Video Relay nTouch through a free smartphone app associated with their registered Sorensen nTouch account, which is a useful tool when it is necessary to contact the program participant by telephone.

Outgoing calls by hearing staff to a deaf or hard-of-hearing program participant who uses a video relay service videophone can be made by dialing the participant's 10 digit telephone number from a standard telephone, which automatically routes through the video relay service.

This service should NEVER be used for in-person communication. This is only for use with telephone calls made to or by a deaf or hard-of-hearing program participant who signs.

CART (Captioning in Real Time):

Local Certified CART Provider:

Taylor, Theresea
The Caption Company, Inc.
4560 Harbour North Court
Jacksonville, FL 32225
904-707-9459

Pocketalker:

A Pocketalker is available from the Hubbard House, Inc. Single Point-of-Contact upon request for participants at any Hubbard House location.

TTY:

The 24-hour domestic violence hotline has a dedicated TTY line available at 904-354-3958. All hotline staff are trained to use this equipment.

There is also a TTY line available at our Outreach office at 904-400-6325.

Florida Relay 711

Deaf or hard-of-hearing participants who communicate via their TDD/TTY may phone standard Hubbard House telephone numbers using the 711 Florida Relay Service. All staff should be familiar with this service in order to avoid confusion or hang-ups when this occurs.

If your office does not have a TDD/TTY machine, you can also contact deaf or hard-of hearing program participants who communicate using a TDD/TTY via the Florida Relay Service by dialing 711.

In addition to reaching the Florida Relay by dialing 711, you can also reach them using the toll free numbers below:

- 1-800-955-8771 (TTY)
- 1-800-955-8770 (Voice)
- 1-800-955-1339 (ASCII)
- 1-877-955-8260 (Voice Carry Over-Direct)
- 1-877-955-5334 (Speech-to-Speech)
- 1-877-955-8773 (Spanish)

Auxiliary Aids and Services Documentation:

Hubbard House will document in the program participant's service file the program participant's or companion's preferred method of communication and any requested auxiliary aids or services provided. Documents and forms verifying when and how Hubbard House provided auxiliary aids and services to customers and companions shall be retained by Hubbard House for 10 years. Forms include but are not limited to:

- Customer or Companion Assessment and Auxiliary Aid and Service Record
- Customer or Companion Request for Free Communication Assistance or Waiver of Free Communication Assistance
- Customer or Companion Feedback Form (given to participant; not maintained in files)
- Auxiliary Aid Service Record Monthly Summary Report

In addition to maintaining records in the program participants' files, the SPOC will also maintain copies of these documents for civil rights monitoring purposes.

Referrals:

Staff must ensure that the program participant agrees to and desires any referrals made and documented in the participant's service record. After securing a signed "Release of Confidential Information" allowing staff to contact the agency to whom the participant is being referred, staff shall inform the agency of the participant's preferred auxiliary aid or service needs for communication.

Denied Auxiliary Aid Requests:

If a staff member is not familiar with an auxiliary aid requested, they should contact the Hubbard House, Inc. Single Point-of-Contact or their direct supervisor or on-call manager for information and ask the program participant for any information that they may need to secure this auxiliary aid or service. Staff should ensure that the program participant is aware that costs for auxiliary aids or services are the responsibility of Hubbard House rather than the participant. Staff **may not deny a request** for auxiliary aids or services for an **aid-essential communication** situation.

Only the Chief Executive Officer can deny an auxiliary aid or service request made by a customer or companion for an aid-essential communication situation. The Hubbard House, Inc. Single Point-of-Contact will contact the Section 504/ADA Coordinator if an auxiliary aid or service is requested that we do not currently have access to and will exhaust available options before notifying the CEO that the requested aid or service is not available. If staff deny a request for auxiliary aids or services in a **non-aid-essential** situation, they must still ensure that an equivalent level of effective communication is achieved through whatever alternative means are provided. Documentation, with supporting justification, must be made if any request was not honored.

Documentation/Record Retention:

Records relating to auxiliary aids and services shall be retained for 10 years in the program participant's file and by the Hubbard House, Inc. Single Point-of-Contact.

Redacted copies of these records, including requests for accommodations and relevant supporting documentation, will be forwarded to the designated Section 504/ADA Coordinator and to the FCADV Single Point-of-Contact as applicable.

HHS Reports:

Hubbard House, Inc. shall submit HHS reports to the FCADV Contract Manager on a monthly basis by no later than the 5th day of each month.

Customer Feedback Forms:

After providing services, the "Department of Children and Families Customer/Companion Feedback Form" (see appendix) must be provided to customers or companions who are deaf or hard-of-hearing, and staff should provide assistance in completing the forms if requested to do so by the customer or companion. The original "Customer/Companion Feedback Form" shall be mailed to DCF, Office of Civil Rights, 1317 Winewood Blvd., Building 1, Room 110, Tallahassee, FL 32399-0700 by the participant or, if requested, by Hubbard House staff. It should not be returned to Hubbard House. After providing services, staff should provide the program participant with the "Department of Children and Families Customer/Companion Feedback Form" (see appendix), which the program participant should return directly to DCF by mail or by dropping it off at a local DCF office rather than returning it to Hubbard House. If the participant needs assistance filling this out, they can contact the number on the form or find sign-language instructions for filling out the form online at <http://www.dcf.state.fl.us/admin/servicedelivery/publications.shtml>. If the program participant or companion is Limited English Proficient, additional interpreter services may be offered to ensure that the program participant or companion understands and is able to complete the feedback form.

Customer Complaints:

Hubbard House, Inc. is committed to maintaining a work environment that is free of discrimination and harassment. In keeping with this commitment, we will not tolerate discrimination or harassment of program participants by anyone working or volunteering for Hubbard House, Inc.

All Hubbard House participants have the right to express dissatisfaction/complaints with an experience with services received from Hubbard House, an action(s) of Hubbard House staff, or if you have been wrongfully denied access to a Hubbard House service. Please contact one of the program supervisors listed below to discuss your dissatisfaction/complaint to explore possible resolutions.

- Shelter Manager (904-354-0076 ext. 302)
- Shelter Advocacy Services Manager (904-354-0076 ext. 322)
- Children Services Manager (904-354-0076 ext. 276)
- Community Outreach Manager (904-400-6300 ext. 251)
- Specialized Services Manager (904-400-6300 ext. 223)

When speaking with a Hubbard House staff member regarding a dissatisfaction/complaint, they may ask for more information or conduct an investigation regarding your concerns. If you are not satisfied after meeting with the program supervisor, the program supervisor will help you schedule an opportunity to talk with the Chief Operating Officer (COO). You may also contact the Chief Operating Officer directly (904) 354-0076 ext. 333 if the dissatisfaction is regarding a program supervisor. However, the COO reserves the right to refer any dissatisfaction/complaint to program supervisors for follow-up instead. If the dissatisfaction/ complaint is regarding the COO, then you may contact the Chief Executive Officer (CEO) at (904) 354-0076 ext. 300. Alternately, requests to discuss dissatisfactions/complaints may be presented in written form to appropriate management staff as described above.

Suggestions can be placed in the suggestions boxes that are located on the first floor of the Emergency Shelter and in the lobby at the Outreach Center. However, information placed in suggestion boxes are not considered formal grievances. Formal grievances must follow the steps outlined below.

A formal grievance must be submitted in writing to the COO if you feel that you have been discriminated against, harassed, or bullied. Use the available grievance form (please see staff for a copy of the form) and/or provide the information listed below. Place your written grievance in a sealed envelope. Put the date and "Attention: COO" on the envelope. Provide the sealed envelope to the person at the reception desk (or another available staff member) and ask them to place it in the appropriate Hubbard House mailbox. The COO reserves the right to refer the dissatisfaction/complaint/grievance to program supervisors for follow-up instead. If the grievance is regarding the COO, then the written grievance should be put to the attention of the CEO in the same manner described previously.

Discrimination, Harassment, or Bullying

- a. How were you discriminated against, harassed, or bullied?
- b. What is the name of the person who discriminated against, harassed, or bullied you?
- c. On what date(s) did the discrimination, harassment, or bullying occur?
- d. What is your name?
- e. How can we contact you?

Participants are also made aware that they may file discrimination, harassment, or bullying grievances (civil rights complaints) to state or federal government agencies. This information can be found on the Department of Children and Families (DCF) non-discrimination poster as well as the grievance procedures and civil rights policies made available to shelter and outreach program participants.

Timeline for Response:

- 1) Requests to discuss dissatisfaction/complaints with program supervisors will be scheduled within 3 working days of the request (verbal or written). Follow-up requests with the COO will be scheduled within 5 working days of request to speak with COO. However, the COO reserves the right to refer any dissatisfaction/complaint to program supervisors for follow-up instead. In some situations where safety and security are an issue, the response will be made as soon as possible. A written or verbal decision regarding dissatisfaction/complaints will be provided within 10 working days following the initial contact with participant.
- 2) Initial contact regarding written grievances concerning discrimination, harassment, or bullying will be responded to within 5 working days of Hubbard House staff receiving the complaint. However, in some situations where safety and security are an issue, the response will be as soon as possible. A written decision regarding the grievance will be provided within 10 working days following the initial contact with participant regarding the grievance.

Record Keeping:

- 1) COO will retain dissatisfaction, complaint, and grievance records.
- 2) Timeframe for keeping records – 10 years
- 3) Access to records: During the dissatisfaction/complaint/grievance investigation, the involved program supervisors, COO, and CEO will have access to the documents. After resolution, documents are available to the COO and CEO.

Complaint Reviews:

COO reviews dissatisfaction/complaints/grievances during the investigation process as described above. CEO reviews dissatisfaction/complaints/grievances at least quarterly or on demand.

In addition to the above actions, discrimination complaints may also be filed externally with the state and federal governments.

State Offices

Assistant Staff Director for Civil Rights
1317 Winewood Boulevard
Building 1, Room 110
Tallahassee, FL 32399-0700
850-487-1901

Executive Director
Florida Commission on Human Relations
2009 Apalachee Parkway, Suite 100
Tallahassee, FL 32301-4857
850-488-7082

Federal Offices

US Department of Health & Human Services
Office for Civil Rights
Atlanta Federal Center, Suite 3B70
61 Forsyth Street, SW
Atlanta, GA 30303-8909
404-562-7881

US Department of Justice
Coordination & Review Section
Civil Rights Division
P.O. Box 66118
Washington, DC 20035-6118
202-514-0301