



Auxiliary Aids and Services Plan Summary

Micah's Place, 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 Micah's Place website.

Non-Discrimination Policy:

Micah's Place, 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 Micah's Place, 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 Micah's Place direct service locations. The names and contact information for the Single Point-of-Contact for Micah's Place, 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 Micah's Place, Inc. Single Point-of-Contact, Taylor Riffey, will ensure effective communication with Deaf or Hard-of-Hearing customers or companions in accordance with Section 504 and the ADA. The Micah's Place, 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:

Micah's Place, 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 triffey@micahsplace.org so that they can be available to you from the start of the event.

Serving Limited English Speaking Survivors:

Micah's Place is 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) Stratus Video offers comprehensive language services including video remote interpretation (VRI), over-the-phone interpretation (OPI), and an easy connection to local on-site interpreters. www.stratusvideo.com or 727-451-9766.
- 2) International Language Service (ILS) 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. www.ilsjax.com or 904-504-4994.

Serving Survivors with Disabilities:

Micah's Place, Inc. is committed to ensuring accessibility for all program participants, visitors, volunteers, and staff with disabilities. Micah's Place 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:

Micah's Place, 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, Micah's Place 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:

1. Independent Living Resource Center of Northeast Florida(ILRC):

Request an interpreter online at <http://www.theilrc.org/interpreter-request/>

Contact: *Stephanie Monroe*

Interpreter Coordinator

904-874-0089

Stephanie@theilrc.org

Main Office: 904-399-8484

Email: interpretings@theilrc.org

2. International Language Service (ILS): www.ilsjax.com or 904-504-4994.

Video Remote Interpreting:

- 1) Stratus Video offers comprehensive language services including video remote interpretation (VRI) and an easy connection to local on-site interpreters. www.stratusvideo.com or 727-451-9766.

Video Relay Service:**Florida Relay Service – 7-1-1**

Through the Florida Relay Service, people who use specialized telephone equipment can communicate with people who use standard telephone equipment. To call Florida Relay, dial 7-1-1, or use the appropriate toll free numbers below:

- 1-800-955-8771 (TTY)
- 1-800-955-8770 (Voice)
- 1-800-955-1339 (ASCII)
- 1-877-955-8260 (VCO-Direct)
- 1-877-955-5334 (STS)
- 1-877-955-8773 (Spanish)

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 Micah's Place, Inc. Single Point-of-Contact upon request for participants at any Micah's Place location.

TTY:

The 24-hour domestic violence hotline has a dedicated TTY line available at 904-225-9979. All hotline staff are trained to use this equipment.

Florida Relay 711

Deaf or hard-of-hearing participants who communicate via their TDD/TTY may phone standard Micah's Place 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:

Micah's Place 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 Micah's Place provided auxiliary aids and services to customers and companions shall be retained by Micah's Place 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 Micah's Place, 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 Micah's Place rather than the participant. Staff **may not deny a request** for auxiliary aids or services for an **aid-essential communication** situation.

Only the Executive Director can deny an auxiliary aid or service request made by a customer or companion for an aid-essential communication situation. The Micah's Place, 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 Micah's Place, 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:

Micah's Place, Inc. shall submit HHS reports to the FCADV Contract Manager on a monthly basis by no later than the 3rd 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 Micah's Place staff. It should not be returned to Micah's Place. 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 Micah's Place. 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:

Micah's Place, 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 Micah's Place, Inc.

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

- DV Services Director (904-225-0134)
- Executive Director (904-491-6364 ext. 101)

When speaking with a Micah's Place 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 Executive Director. You may also contact the Executive Director directly (904) 491-6364 ext. 101 if the dissatisfaction is regarding a program supervisor. However, the Executive Director 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 in 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 DV Services Director 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: DV Services Director" on the envelope. Provide the sealed envelope to the advocate on staff and ask them to place it in the appropriate Micah's Place mailbox. The DV Services Director reserves the right to refer the dissatisfaction/complaint/grievance to program supervisors for follow-up instead. If the grievance is regarding the DV Services Director, then the written grievance should be put to the attention of the Executive Director 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 DV Services Director will be scheduled within 5 working days of request to speak with the DV Services Director. However, the DV Services Director 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 Micah's Place 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) The DV Services Director 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, DV Services Director, and Executive Director will have access to the documents. After resolution, documents are available to the DV Services Director and Executive Director.

Complaint Reviews:

DV Services Director reviews dissatisfaction/complaints/grievances during the investigation process as described above. Executive Director 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