



## **Accessibility of Services for Disabled Clients**

1. People with mobility, circulatory, respiratory or neurological disabilities use devices for mobility such as canes, walkers, crutches, braces, manual and power wheelchairs or electric scooters. All facilities will be physically accessible to the extent required by the ADA. Storage will be facilitated when the device is not needed.
  
2. All staff will be provided a copy of the Client's Rights Policy for purposes of education and training and to ensure compliance throughout the agency. CHN provides notice of the availability of and procedure for requesting auxiliary aids and services through notices in our brochures and website and through notices posted in waiting rooms. When an individual self-identifies as a person with a disability that affects the ability to communicate or to access or manipulate written materials or requests an auxiliary aid or service, staff will consult with the individual to determine what aids or services are necessary to provide effective communication in particular situations. The staff will document their quest on the *Reasonable Accommodations Request* form and submit it to the ADA Coordinator. However, submitting the request in writing is not necessary in order to respond to the request. The Program Administrator shall contact the ADA Coordinator at ADAcoordinator@citrushealth.com or 305-424-3183 who will provide guidance on how to respond to the request. The ADA Coordinator should also receive a copy of the completed *Reasonable Accommodations Request* form including the description of the request and the actions taken in response. Such special services are required to be available within two hours for emergency services or for the next scheduled appointment for non-emergency services
  - A. For Outpatient Services:  
Staff will complete the Client Communication Assessment Auxiliary Aid Service Record and the Customer or Companion Waiver for Free Interpreter Service form at every encounter.
  - B. For Inpatient, Residential and Community Support Services:  
Staff will complete the Client Communication Assessment Auxiliary Aid Service Record, the Customer or Companion Waiver for Free Interpreter Service form and a Communication Plan for Ongoing Services during the initial encounter and every 90 days thereafter. If a declination form is completed, the client will be notified that they can request the Free Interpreter Service at any time.
  - C. Staff must file both original forms in the client's record. A copy of the Assessment and the Waiver form must be submitted to the ADA Coordinator before the last day of the month of the service.

3. If a client is being admitted into one of CHN's 24-hour programs or the CSU, the Administrator of the program or designee shall be immediately notified and (s)he will consult with the client to determine how the client most effectively communicates. Once a determination has been made, the Administrator shall arrange for the provision of special services or auxiliary aids, if needed.
4. Examples of special services or auxiliary aides may include but are not limited to:
  - A. An existing list of interpreter services listed below and under contract with Citrus Health Network:
    - InterpretEars (ASL and SSL)
    - Stratus Video (ASL Video Remote Interpretation and foreign languages, on VRI or on demand over the phone)
  - B. An assistive listening device, specifically the Pocket Talker is available for the hard of hearing.
  - C. The list of certified interpreter services will be available at each location, including contact information for staff.

These services will be provided at no additional cost. In an emergency situation, the services will be provided as soon as possible but within two (2) hours of the arrival of the individual during an emergency. Non-emergency cases may be scheduled within 24 hours. Only certified interpreters will be used for service. The ADA Coordinator will verify certification of the interpreter by accessing the State of Florida database system. Some persons who are deaf or hard of hearing may prefer or request to use a family member, companion, or friend or persons who are deaf or hard of hearing may prefer to communicate in writing or by lip reading. In either case, the client will be informed that the use of an interpreter will be provided at no charge. If the client refuses the interpreter, a Waiver Form will be provided to the client to complete. However, family members, companion or friends of the person, or any other way of communication will not be used as interpreters if not clinically indicated. If the person chooses to use a family member, companion, or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy and conflict of interest will be considered. If the family member, companion or friend is not competent or appropriate for any of these reasons, certified interpreter services will be provided. The offer, the response of the client and the refusal must be documented in the client's file.

NOTE: Children and other residents will never be used to interpret, in order to ensure confidentiality of information and accurate communication.

D. A CART/TTY/TDD teletypewriter telephonic device which will be provided within a reasonable period of time. Staff and prospective clients also have the availability Florida Relay Service to communicate by phone. To use the system, call 7-1-1 or one of the following toll-free numbers to get connected to our 24 hour line, 305-823-0080. These numbers are:

1-800-955-8771	(TTY)
1-800-955-8770	(Voice)
1-800-955-1339	(ASCII)
1-877-955-8260	(VCO-Direct)
1-800-955-5334	(STS)
1-877-955-8773	(Spanish)
1-877-955-8707 (French Cr)	

E. For the visually impaired, oral or amplified material may be provided according to the needs of the client. Staff assistance will be provided if requested or as necessary. Staff is available to communicate information contained in written materials concerning treatment, benefits, services, waivers of rights, and consent to treatment forms by reading out loud and explaining these forms to persons who are blind or who have low vision. Staff is also available to assist persons who are blind or who have low vision in filling out forms and in otherwise providing information in a written format. Other accommodations may include: reformatting into large print or alternative formats; taping or recording of print materials not available in alternate format; or other effective methods that help make visually delivered materials reasonably available to individuals who are blind or who have low vision.

F. For those with speech disabilities or communication disability, writing materials, TDDs; computers, flashcards; communication boards or other communication aids may be provided for use at the facility.

G. For persons with manual disability, staff may assist in holding or turning pages, providing use of speakerphone, or other assistance.

H. CHN will allow service animals to accompany people with disabilities in all areas where clients and other members of the public are allowed. Service animal means an animal that is individually trained to do work or perform tasks for the benefit of an individual with a disability. The work or tasks performed by a service animal must be directly related to the handler's disability. Only dogs and miniature horses are recognized as service animals under the ADA. When it is not obvious what service an animal provides, only limited inquiries are allowed. Staff may ask two questions:

- (1) is the dog a service animal required because of a disability,  
and
- (2) what work or task has the dog been trained to perform.

A person with a disability cannot be asked to remove his service animal from the premises unless: (1) the dog is out of control and the handler does not take effective action to control it or (2) the dog is not housebroken. The service animal is also permitted in inpatient areas unless it causes a direct and serious threat to safety or it would cause an unreasonable and fundamental alteration of CHN policies and procedures. When there is a legitimate reason to ask that a service animal be removed, staff must offer the person with the disability the opportunity to obtain goods or services without the animal's presence.

Emotional support animals, comfort animals, and therapy dogs are not service animals under the ADA; however, a service animal can be used for a psychiatric disability under the ADA. In that case, the above questions may be asked of the client.

- I. Emotional Support Assistance Animals: CHN clients may request a medical opinion letter from a CHN medical provider in order to document their need for an accommodation to keep their animal in their housing or may request an accommodation in housing operated by CHN. *See Housing Section below for more details regarding accommodations requested related to CHN housing.*
  - a. A CHN medical provider may provide a letter to a CHN client that they are treating to help them verify that they need an assistance animal or emotional support animal in order to allow their animal to stay in their housing.
  - b. An “emotional support animal” means an animal that does not require training to do work, perform tasks, provide assistance, or provide therapeutic emotional support by virtue of its presence which alleviates one or more identified symptoms or effects of a person’s disability, pursuant to Section 760.27 Florida Statutes. Similarly, “assistance animals” under the Federal Fair Housing Act are animals that can provide assistance, perform tasks or provide emotional support for the disabled person. This type of animal is not limited to a certain type of animal.
  - c. The CHN health care provider can choose to write a letter documenting this need if the provider has:
    - i. personal knowledge of the person’s disability and,
    - ii. is acting within the scope of their practice and
    - iii. provides information identifying the particular assistance or therapeutic emotional support provided by the specific animal.
  - d. A sample *Need for Emotional Support Assistance Animal Letter* is available in Tools.
- J. For those with mobility disabilities, Citrus has contracted with non-emergency transportation services (Security Behavioral Transport and National Health Transport) to provide, without cost to the client, a wheelchair accessible vehicle to accommodate disabled clients in the same way as ambulatory clients.

- K. All reasonable and necessary auxiliary aids and services shall be provided without cost to the person being served.
  - L. The ADA Coordinator must document what accommodation was provided or an explanation of why it was not provided in the Reasonable Accommodations Request form. The Client Communication Assessment Auxiliary Aid Service Record will be submitted monthly to CHN's contract managers. Subcontractors will be notified of their responsibilities with ADA when an agreement is signed and monitored for compliance. A list of subcontractors is available from CHN's Legal Counsel.
  - M. The client will be provided the Department of Children and Families Customer/Companion Feedback Form for completion as follows:
    - A. For CSU clients: at time of CSU discharge
    - B. For outpatient clients: at first scheduled appointment
    - C. For residential, Community Support Services and SIPP clients: within one week of admission
5. Notices and posters shall be posted in an area visible by visitors to inform them:
- A. of how they can request a special accommodation due to a disability, such as CART/TTY/TDD teletypewriter telephonic device, fire alarm system strobe lights, wide capacity wheelchairs, ADA approved elevator telephones, enhanced written materials, large numbers dialing telephones; and
  - B. of state and federal enforcement offices where complaints may be reported, and
  - C. to report concerns about possible Title II or Title III violations of the Americans with Disabilities Act (ADA); and
  - D. that these accommodations are provided free of charge
6. When sending out invitations to meetings, conferences, seminars or posting announcements, staff will add the following statement to documents: "If you need any auxiliary aids or services, such as a sign language interpreter, or printed material in alternative formats, or if you are not proficient in the English language, please contact the ADA Coordinator prior to the meeting at 305-815-7426 during office hours to request the service. These services are provided free of charge". Sign will also be posted in agency vehicles.