

Auxiliary Aids Plan 2026-2027

Henderson Behavioral Health (HBH) shall ensure compliance by their agency staff with the requirements of Title VI of the Civil Rights Act of 1990, as amended, Title II of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973 and Limited English Proficiency (LEP). Authority: 45 CFR, Part 80, and Florida CFOP 60-16.

Single Point of Contact - SPOC

The Single Point of Contact (SPOC), for HBH is the Risk Management Coordinator. The back-up SPOC for the agency is the Compliance Officer.

The Single Point of Contact (SPOC) will monitor and evaluate effectiveness and efficiency of the Auxiliary Aid Plan and the SPOC job description annually.

The SPOC will ensure effective communication with deaf or hard-of-hearing consumers and companions, as well as consumers with limited English proficiency.

HBH will ensure that their employees are aware of the requirements, roles, responsibilities, and receive the required training upon hire at orientation. HBH will ensure yearly refresher training on serving deaf or hard-of-hearing consumers and civil rights training.

The SPOC will ensure that their auxiliary aids and services plan is reviewed annually and updated as needed, with any updates communicated to directors and managers and facilitated through the safety committee members. This plan can be made available in alternative formats upon request.

This plan is also available on our website: www.hendersonbh.org

HBH Staff at any time during the process of assessing and providing for auxiliary aids/services can request the assistance of the SPOC or backup SPOC at 954-777-1612 or 954-777-1673.

Assessing Communication Needs

At the initial point of contact, the HBH SPOC or SPOC backup will be notified immediately. An assessment of communication needs will be conducted for all individuals or companions who are deaf

or hard-of-hearing using the required Florida Department of Children and Families documents. The required documents will be completed at each interaction/service to the client or companion. The purpose of these tools is to facilitate the collection and coordination of auxiliary aids and services to meet the needs of Consumers or Companions who are deaf or hard-of-hearing.

HBH will always recognize that the Consumer or Companion's preference is the primary consideration in determining what auxiliary aids or services to provide. If communication through a specific aid or service is deemed to be ineffective, the HBH SPOC will assist the consumer or companion in determining a more effective aid or service for communication. Documentation shall be made in the consumer file regarding the attempt to improve the effectiveness of auxiliary aids and services. Once the assessment is completed, the SPOC or assigned agency staff shall obtain auxiliary aids according to the communication and request for services assessment.

Provision of Interpreters/Services

At no time is it acceptable for staff to deny services to a Consumer without notifying the SPOC. If staff, based on the Communication Assessment, find that auxiliary aids or services are not essential, staff are to contact the SPOC. Additionally, if staff are unsure of how to proceed, they are to immediately contact the HBH SPOC at 954-777-1612.

HBH staff shall provide interpreters for Consumers and Companions who are deaf or hard-of-hearing in a timely manner in accordance with the following standards:

HBH staff will utilize Jeenie services, requesting appropriate service, including but not limited to ASL.

Verification of requirements for interpreters to practice via Jeenie services will be included in the Auxiliary Aids Service Plan.

Auxiliary Aids Documentation

HBH staff shall document the Consumer or Companion's preferred method of communication, and any requested services provided in the Consumer's record. Documentation, including progress notes, evidencing when and how the staff provided aids and services to Consumers or Companions shall be retained in the Consumer's record for seven years after the case is closed. Files include but are not limited to:

- Consumer or Companion Assessment and Assessment Aid and Service Record
- Consumer or Companion Request Free Communication Assistance or Waiver
- Consumer or Companion Feedback Form
- Consumer Plan (for providing auxiliary aids and services on an ongoing continuous basis)
- Verification of requirements for interpreters to practice via Jeenie services.

Referrals

If Consumers or Companions are referred to other agencies, the attending staff and/or SPOC must ensure that the receiving agency is notified of the Consumer or Companion's preferred method of communication and any auxiliary aid for service needs. To accommodate this effectively, the attending staff and/or SPOC will ensure that the referral is approved by the participant and that he or she signs a Release of Information for each referral being made. These actions will be recorded and maintained in the Consumer's record.

FL DCF Customer Feedback Form

The attending staff shall distribute the required Florida DCF Consumer/Companion Feedback form to Consumers or Companions that are deaf or hard-of-hearing and help in completing the forms if requested by the Consumer or Companion. Complaints and grievances will be forwarded to the HBH SPOC. SPOC will address concerns with consumer or companion and ensure appropriate adjustments are made. Consumers and Companions shall be instructed to mail the original feedback form to DCF, Office of Civil Rights, 1317 Winewood Boulevard, Building 1, Room 110, Tallahassee, FL 32399-0700, or if requested by the Consumer or Companion; by the SEFBHN SPOC. A copy of the

Consumer/Companion Feedback Form shall not be kept in the Consumer record/file, it shall be forwarded to the above Tallahassee address.

Limited English Proficiency Consumers

HBH will provide foreign language interpretation for any Consumer who requests such assistance.

HBH will utilize the Jeenie Platform.

These resources can be found in the Communication Resources binder at each service location, including all the forms mentioned above, the language line instructions, language identification flashcards, relevant policies and a copy of this Auxiliary Aids Plan.

Documentation/Record Retention

Records relating to auxiliary aids and services provided shall be retained by HBH SPOC for at least 7 years after the client's case is closed with Henderson Behavioral Health.

Signage

The SPOC will ensure that conspicuous notices which provide information about the availability of appropriate auxiliary aids and services at no cost to the deaf or hard-of-hearing Consumers or Companions are posted near Consumer/Companion entrances, and locations where Consumers and Companions receive services. The HBH SPOC's name and contact information will be available on the Deaf and Hard of Hearing Poster as well the name and contact information for the FL DCF Regional Civil Rights Officer/ ADA 504 Coordinator. SPOC will review notifications and materials available to ensure accommodation for individuals with disabilities are made.

The following facility requirements will be monitored and maintained at least annually:

- Poster interpreter services for the Hearing-Impaired Poster
- DCF Non-Discrimination Poster
- Limited English Proficiency Poster
- Fire alarms have lights and sound
- Updated Auxiliary Aid Plan is posted in the provider's website

The HBH SPOC shall ensure submission of the monthly HHS Report, no later than: The 5th of each month, for the previous month. Submission will be made to SEFBHN's and BBHC Contract Manager and to the Regional Civil Rights Officer/ADA 504 Coordinator.

Event Accommodations

HBH shall ensure accessibility to meetings, conferences and seminars to persons with disabilities, limited English proficiency, and those who are deaf or hard-of-hearing. HBH will notify the public by placing the following statement on all notices and advertisements prior to the event:

Henderson Behavioral Health will provide accommodations, including American Sign Language interpreters, assistive listening devices, alternative formats of printed materials and real-time captioning upon requests for persons who are deaf, hard of hearing or are living with disabilities. To ensure accommodation, please make your request within 7 days prior to the event **by calling the office directly and ask to speak with the Single Point of Contact (SPOC)/Risk Manager Coordinator or Compliance Officer.**

Staff Training

HBH staff members shall receive the Florida DCF approved training Service Delivery for the Deaf or Hard-of-Hearing, training and device set-up to use Jeenie interpretation services, along with general Civil Rights Training at general orientation, upon hire or within 60 days of commencing employment. Staff members shall receive annual refresher training on all, and refresher training as needed on how to use Jeenie services and other Auxiliary Aids equipment that is available at HBH. Staff will sign Support to the Deaf and Hard of Hearing Attestation Form upon completion of their annual training each year. Training documentation and the Attestation Form shall be maintained in each employee's file.

HBH Auxiliary Aids Services for Deaf and Hard of Hearing Consumers

Henderson Behavioral Health has several resources available to staff in the Communication Resources Binder at each location. Staff are advised to ask the SPOC or SPOC back up for assistance in locating any resources needed. This includes instructions and access to use Jeenie services.

Consumer Complaints

If you believe you were denied access to services or discriminated against:

Ask to speak to the HBH Risk Management Coordinator (SPOC) or Compliance Officer immediately.

You may submit your complaint/grievance in writing and mail it to:

Henderson Behavioral Health – 4740 North State Road 7, Suite 201, Lauderdale Lakes, Florida, 33319

Complaints/grievances can also be sent via email to: mglenn@hendersonbh.org include the following information in your complaint/grievance:

What service were you denied?

What were you told was the reason you were denied service?

What person denied your services?

What was the date and time you were denied service?

Discrimination complaints may also be filed externally with the state and federal government:

Assistant Staff Director for Civil Rights

2415 North Monroe Street

Suite 400

Tallahassee, FL 32303-4190

850-487-1901

Executive Director

Florida Commission on Human Relations

2009 Apalachee Parkway, Suite 100

Tallahassee, FL 32301-4857

850-488-7082

Disability Rights Florida
2473 Care Drive #200
Tallahassee, FL 32308
(800) 342-0823

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
Civil Rights Division
950 Pennsylvania Avenue, N.W.
Office of the Assistant Attorney General, Main
Washington, D.C. 20530

HBH NON-DISCRIMINATION POLICY

Henderson Behavioral Health (HBH) will protect and promote the rights of people served in accordance with all applicable federal and state laws and regulations. At all times, persons served will be treated with respect and dignity and with sensitivity to their age, gender, socio-economic status, social supports, cultural orientation, psychological characteristics, sexual orientation, physical situation, and spiritual beliefs as required by the regulations implementing Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1975, and FL Statute 397.501.