



ACCESSIBILITY PLAN



**Accessibility Plan in accordance with
Title I, Title II, Title III & Title VI Americans with Disability Act (ADA) of 1990 and the
Florida Department of Children and Families (DCF)
ADA Deaf and Hard of Hearing Settlement Agreement January 2010
Reviewed: December 2017
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In support of our mission and values as an organization, Gulf Coast Jewish Family and Community Services (Gulf Coast JFCS) is actively involved in maximizing accessibility to facilities and service delivery, as well as providing the highest professional relationships for our clients and stakeholders.

While Gulf Coast JFCS strives to provide services at all hours, in locations, in environments and with staff patterns designed to maximize easy access to services, we also recognize that barriers present in many forms and have the potential to impact not only persons served, but community partners and staff as well. Those barriers may include architectural, environmental, attitudinal, financial, employment, communications, transportation, and other barriers not specifically identified.

In an effort to identify and remove potential barriers, Gulf Coast JFCS annually assesses, develops initiatives if needed, and initiates renovations and improvements to address the needs. In the event that barriers present themselves which may require extensive time and resources, a corrective action plan is developed and monitored until the appropriate enhancements can be completed.

At all stages of the Accessibility Plan, persons served, staff, and the administrative team of Gulf Coast JFCS are involved in the assessment, decision making and implementation processes.

Gulf Coast JFCS has a Risk Management and Safety Committee comprised of representatives from every facility that meets quarterly. It is a goal of Gulf Coast JFCS to raise awareness and as that awareness is raised, particularly among persons served, individuals will be empowered to advocate for reducing/eliminating barriers in the communities in which they live and work.

The Gulf Coast JFCS Accessibility Plan is developed from information gathered through the Gulf Coast JFCS Architectural Accessibility Plan, Risk Management and Safety Committee meeting recommendations, and solicited input from our clients through Consumer Satisfaction Surveys.

The Accessibility Plan applies to all Gulf Coast JFCS locations.

Purpose

The purpose of the Accessibility Plan of Gulf Coast JFCS is to ensure that:

1. Applicants, employees and clients with disabilities will have the same access to equal employment opportunities as individuals without disabilities in accordance with Title I, Title II and Title III of the ADA of 1990.

2. Clients with disabilities will have access to the same quality of care and opportunities for care as clients without disabilities.

The agency will correct barriers if readily achievable, that inhibit the free participation of individuals with disabilities in all of the programs and benefits provided by the agency to all applicants, employees, and clients provided such modifications would not pose a significant risk or threat to the health and safety of others.

The agency will provide reasonable accommodations through Auxiliary Aids per the January 2010 Settlement Agreement with the Deaf and Hard of Hearing Plaintiff, when required, for applicants, employees and clients with disabilities as long as the accommodation does not impose an undue hardship on the agency.

The agency will ensure that construction of new facilities used for public accommodation will be readily accessible by individuals with disabilities in compliance with the ADA Accessibility guidelines (ADAAG), except where the agency can demonstrate that it is structurally impractical to meet the requirements. Likewise, alterations to existing facilities that provide accommodation will be in compliance with the ADAAG, except where the agency can demonstrated that is structurally impractical to meet the requirement.

Areas of Potential Impact

Architectural:

Gulf Coast JFCS has a maintenance department that is responsible for repairing any environmental issues identified by staff. Safety Coordinators at each facility are responsible for internal Health and Safety inspections as well as overseeing the general cleanliness and environmental condition of all facilities. Each facility has full or part-time cleaning staff to assure that facilities present as clean and safe environments for persons served and staff.

Safety regulations and precautions are strictly enforced and monitored to prevent slips/trips/ falls, fires, poor air quality and seasonal risks. Gulf Coast JFCS has designated smoking areas at all locations/facilities. Staff is routinely tested on their reaction and evacuation response to emergency situations. When an environment is created that results in potential health hazard for persons served or staff, administration quickly responds to protect the health of those involved.

Gulf Coast JFCS has staff appointed to participate on the agency safety committee. These members meet quarterly to make recommendations that will create and enhance an environment that promotes comfort for the clients served and staff to ensure optimal effectiveness and productivity.

Environmental:

Gulf Coast JFCS strives to provide an environment that promotes comfort, productivity and confidentiality.

Attitudinal:



Gulf Coast JFCS strives to be faithful to the vision and mission of the agency and its Board of Directors as well as to demonstrate consistency between beliefs and actions. The agency and the board are structured and staffed to reflect the diverse needs of our customers, including providing services that are geographically responsive. The agency is committed to cultural competency in an ongoing learning process that enhances and promotes responsiveness in treatment and service delivery to our diverse customers. Gulf Coast JFCS actively recruits, hires and trains employees and board members from a culturally and racially diverse population. Gulf Coast JFCS maintains trainings that enhance understanding and competency by working within the agency to remove potential barriers such as prejudice, discrimination, ignorance, fear, intolerance and discomfort that may arise in working across cultures and populations.

Financial:

Gulf Coast JFCS recognizes our responsibility to render the best quality service at as low a cost as possible, taking into account the client's ability to pay. Gulf Coast JFCS works with persons served to avoid creating financial barriers to essential treatment that can prevent more serious illness or disability. Gulf Coast JFCS staff assists individuals seeking services to apply for Medicaid and related resources when there are financial needs.

Gulf Coast JFCS is named as payee for persons served who receive disability benefits but are unable to successfully manage their funds, thereby risking housing, health care and other needed services. These funds are managed by an Accounts Payable Supervisor and audited regularly to safeguard client's funds.

Communication:

Gulf Coast JFCS promotes ongoing communication with persons with disabilities by soliciting client input through satisfaction surveys. Stakeholder input is also solicited at Board Meetings. Every client receives an opportunity for reasonable accommodations including a reader for those who are visually impaired. Gulf Coast JFCS also provides, at no cost to the client, Amplified Hearing Devices for those Hard of Hearing and Certified Sign Language Interpreters for those who are Deaf. The client or companion's preference shall be the primary consideration with regards to what auxiliary aid or service is provided.

Gulf Coast JFCS recognizes the importance of effective communication between its personnel and the communities we serve. Language barriers can impede access to services and a client's ability to understand important rights and responsibilities. The agency has implemented an organization-wide Limited English Proficiency (LEP) Policy AD350, more commonly known as the LEP Plan. The Plan provides for effective language interpretation to ensure access to program services and benefits for clients who have limited proficiency in English. Title VI of the Civil Rights Act mandates that all programs and services receiving federal funds are required to provide language access for all LEP clients who seek their services.

Language Identification Cards are posted at each Gulf Coast JFCS office entrance. In the event a client informs a Gulf Coast JFCS staff member that they do not have proficiency in English and identifies the language that they speak, the agency ensures that staff interpreters or paid contractors are available and competent to provide interpreter services.



Gulf Coast JFCS staff can access interpreter services, for both LEP and deaf and hard of hearing clients, 24 hours a day, seven days a week.

Transportation:

Gulf Coast JFCS purchases public transportation passes and provides for automotive repair services for qualifying clients. However, should an increase need for services arise for handicap accessibility transportation, Gulf Coast JFCS will link to its referral resources and/or seek to rent such a vehicle to accommodate the client's needs.

Case Managers and Mental Health Support staff do transport clients to medical and clinical appointments in their private vehicles when no other option is available.

Employment:

Gulf Coast JFCS does not discriminate against any applicant for employment purposes or an employee because of race, color, creed, sex, religion age, handicap, gender or any other bias. Gulf Coast JFCS actively recruits minority applicants by advertising positions in regional and national minority publications and minority recruitment sources. Employees who have a hearing impairment have full access to the Video Relay (VR) machines as well as a free Amplified Hearing Device. Any person determined to be Deaf shall be provided with a Sign Language Interpreter who is certified, at no cost for those activities where Assistive Communication is required according ADA requirements. Any handicapped/disabled employee shall expect reasonable accommodation to perform their job.

Community Integration:

Gulf Coast JFCS understands the importance of identifying and removing barriers that prevent clients from being full members of their communities. Gulf Coast JFCS strives to provide a full range of opportunities and supports to clients so they can fully participate in their community of choice.

Technology:

Gulf Coast JFCS recognizes that assistive technology can enhance the delivery of services to clients. Gulf Coast JFCS is constantly assessing and implementing new technologies, such as electronic health records, a system of handheld devices for access and entry into the client record, and technology used by persons with visual or other impairments.

Definitions

1. Title I, Title II & Title III of the ADA of 1990:
 - a. Title I prohibits discriminatory hiring and personnel practices against qualified individuals, and requires employers to make "reasonable " efforts to accommodate an individual's mental health or physical limitations, as long as the accommodation does not present undue hardship on the employer.
 - b. Title II prohibits discrimination in all employment practices of state and local governments, regardless of the number of employees.

- c. Title III prohibits private entities from discriminating against individuals on the basis of disability in the full and equal employment of the goods, services, facilities, privileges, advantages, or accommodations that are open to the public.
2. Individual with a Disability: The ADA defines an individual with a disability as a person who has a physical or mental impairment and the impairment substantially limits one or more of the individual's major life activities; has a record history of such impairment; or is perceived as having such an impairment. The term: "Handicapped person" was used under the Rehabilitation Act of 1973 and resembles the definition of an individual with a disability under the ADA. "Disability" conforms to currently preferred terminology.
3. Impairment: Impairment is defined as any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more systems of the body (such as the nervous and musculoskeletal systems, the respiratory system, the cardiovascular system and the glandular system), or any mental or psychological disorder (such as mental retardation, organic brain syndrome, emotional illness, and learning disabilities). The Equal Employment Opportunity Commission (EEOC) considers an individual impaired even if he or she uses medicine or a prosthetic device to mitigate the effects of the impairment.
4. Major Life Activities: The EEOC defines major life activities as the basic activities that the average person can perform with little or no difficulty, such as caring for one's self, performing manual tasks, walking, seeing, breathing, learning and working. The EEOC further includes in its determination the activities of sitting, standing, lifting, and reaching.
5. Reasonable Accommodations - Three meanings under ADA:
 - a. Modifications or adjustments to the job application process which enables a qualified applicant with a disability to be considered for a particular job.
 - b. Modifications or adjustments to the work environment or to the manner or circumstances under which a job is customarily performed, that enable a qualified person with a disability to perform the essential functions of the job.
 - c. Modifications or adjustments that allow the person seeking the services and privileges of a private company that provide public accommodations to enjoy the same benefits or privileges afforded to an individual without a disability.

Undue Burden or Hardship

The following circumstances are reviewed when determining if a reasonable accommodation poses an undue hardship to the agency:

1. "Significant difficulty or expensive" in trying to accommodate an individual with a disability, taking into account such factors as: the size of the business, its overall financial resources, the cost of the accommodation; the availability of outside funding to help offset the cost; and the alteration of the nature of the operation of the company.
2. Readily Achievable: According to the ADA, the term means easily accomplished and able to be carried out without much difficulty or expense.
3. Accommodations - Two Types:

- a. Auxiliary Aids: Examples: Certified Interpreters, note takers, computer aided transcription services, written materials, and other assistive devices, included but not limited to Amplified Hearing Devices. Closed captioned decoders, telecommunication devices for deaf persons (TDD), videotext displays, etc.. The TDD access will be posted in all job vacancy advertisements.
- b. Barrier Removal: Examples: installing ramps, repositioning shelves, rearranging furniture, rearranging fixtures or equipment, repositioning telephones, widening doors, installing alarm lights, installing grab bars in bathrooms, stalls etc. All barriers to be placed by Gulf Coast JFCS will follow the rules, regulations and permitting processes of the municipality of which it is a resident of.

Accountability

The Director of Human Resources is the designated Title VI Coordinator for the organization and is responsible for the overall coordination, development, and implementation of non-discrimination and delivery of equally effective and equally accessible quality service. The Vice President of Quality, Contracts and Compliance is the ADA 504 Deaf and Hard of Hearing Single Point of Contact (SPOC). All records regarding auxiliary aids and services provided to clients or companions are managed and retained per Gulf Coast JFCS Policy MR050 Records Retention and Destruction.

Reasonable Accommodation

If a client/applicant is visibly impaired at the time of enrollment or application; or has indicated that he/she has an impairment that requires accommodation, the receiving staff will provide the individual with a Request for Reasonable Accommodations form (Form# 64) for completion. If the client/applicant is visibly functional as the client/applicant employee's preferred or previously Vision impaired, the accompanying relative/friend/companion will be asked to read to the client/applicant companion the contents and complete the form for the client applicant. If unaccompanied, the receiving staff will read the form to the client/applicant and assist in completing the form. If client/applicant has another impairment that prevents him/her from completing the form, assistance will be provided by the receiving staff. If the requested accommodation is an Auxiliary Aide, such accommodation will be provided immediately.

If an applicant/client has requested or suggested he/she is able to participate in an activity regularly provided to persons without disabilities due to an architectural barrier, receiving staff will contact the facility Director to make a reasonable attempt to remove the barrier, if readily achievable in accordance with the ADAAG Guidelines and advise the Program Director. If barrier removal is not readily achievable, a barrier removal not necessarily in compliance with ADAAG will be attempted, as long as the safety of everyone is considered and that the alternate accommodation is readily achievable. Clients who require support to live in their community of choice will have identified needs from the completed reasonable accommodation form addressed, as required, within available resources.

Gulf Coast JFCS assures that clients are made aware of the availability of Axillary Aid Hearing devices upon appointment/admission as a client. Should there be a need via visual observation, verbal communication, or prior notification from the referral source, Gulf Coast maintains on hand

two Auxiliary Aid Hearing Devices per location (purchased by the agency and provided at no cost to the client). If the applicant/client requests an Auxiliary Aid hearing device, one shall be provided immediately. The client is encouraged to maintain their device and to have it with them during any and all appointments be it Gulf Coast JFCS related or another entity. Each Gulf Coast program/location has an Auxiliary Aid and Service Plan for Persons with Disabilities and LEP binder outlining resources, such as the Florida Relay Service, Video Remote Interpreting, Video Relay Interpreting and TDD/TTY.

Communication Access Real Time (CART) is a service available to those clients who are Deaf and Hard of Hearing. While Gulf Coast JFCS does not have the direct means to provide this service, we have an indirect means by securing the services of two affiliates in Pinellas County who are able to provide the service: Hardeman Realtime Inc., 7901 42nd Street Pinellas Park Florida 33781 and Alternative Communication Services, LLC Tampa, Florida.

In the case of an applicant for employment, the hiring supervisor will first review the application form without regard to the disability, and determine if the applicant will be interviewed. The hiring supervisor, indicating when the interview will occur, will forward the Request for Accommodation form to Human Resources, who in turn will review it with the appropriate Chief Operating Officer, depending on program/location, and the Vice President of Quality, Contracts and Compliance.

Current employees may also request reasonable accommodations, and this request should be made through their supervisor, who will forward the request to the Director of Human Resources for review with the appropriate Chief Operating Officer, depending on program/location, Vice President of Quality, Contracts and Compliance and Director of Safety as required.

Upon receipt of a request for accommodations, the appropriate Chief Operating Officer, depending on program/location, together with the Director of Human Resources, Vice President of Quality, Contracts and Compliance, and Director of Safety as required, will determine if the request can be reasonably accommodated. Requests for accommodation will be reviewed on a case by case basis

During the interview process, the client/applicant/employee will be consulted on the appropriateness of the accommodation. In the case of a client, the Program Director will consult with the individual; whereas in the case of an applicant or employee, the Program Director, Director of Human Resources and Vice President of Quality, Contracts and Compliance will consult with the individual requesting the accommodation.

If the agreed upon accommodation is determined to be reasonable, such accommodation will be made by either the Program Director, Director of Human Resources and Vice President of Quality, Contracts and Compliance as appropriate. Human Resources will write a letter to the client or applicant/employee that the accommodation will be provided as requested.

If an alternate barrier removal or Auxiliary Aid is determined, by the client/applicant/employee, to be more readily achievable and to be equally functional as the client/applicant/employee's preferred or previously agreed upon mode of accommodation, the individual will be advised in person by the Program Director prior to implementation.

In determining the reasonableness of the requested accommodation, several factors will be considered to ensure that the decision to accommodate will not pose a significant difficulty or expenses to the facility involved.

These factors may include:

1. Type and cost of the accommodation
2. The financial resources of the facility or program involved in the provision of reasonable accommodations, the number of persons employed as such a program or facility, the effect on expense, or the impact of such accommodation upon the operation of the program, facility
3. The overall financial resources and budgetary limitations of Gulf Coast JFCS
4. The effect of the accommodation on the fundamental nature of the overall operation of Gulf Coast JFCS's business.

If the request for accommodation is received from a deaf or hearing impaired individual, the Vice President of Quality Improvement, or designee, will obtain the mode of accommodation in accordance with the reasonable Accommodation for the Deaf and Hard of Hearing based on DCF's protocol regarding Effective Communication.

LEP Plan

The following procedures are to be followed by staff to ensure the accessibility of programs and services to clients or potential clients with LEP.

Client needs are to be assessed through consulting with the client/potential client concerning his/her preferred communication mode and if applicable with the assigned caseworker, counselor, or parent, or other family member, guardians, or other representatives. Language Identification Cards are posted at each Gulf Coast JFCS office entrance to help staff and clients determine language needs.

Language services include, as a first preference, the availability of bilingual staff who can communicate directly with clients in their preferred language.

While Gulf Coast JFCS has in its employ several bi-lingual employees, we utilize the services of the program VOICES. VOICES allows the provision of interpreters in a multitude of languages so that we can adequately meet the needs of the client. When bilingual staff are not available, the next preference is a face-to-face interpretation provided by trained interpreters. In the absence of face-to-face interpretation, the agency has contracted with a telephonic language interpretation service. Policy FCST 730 outlines how employees can access these services for their clients.

If the individual declines the use of the free Voice or Certified Sign Language Interpreter, the client file must be documented to reflect the individual declined the use of the free service. Staff shall suggest that a trained interpreter be present during the encounters to assure that accurate interpretation occurs. Staff must document that every means necessary has been used to assure the client/applicant that the service is available before documenting that the client has

declined. This information must be placed in the LEP client's file. The interpreter must be proficient in both English and the other language.

Minor children should never be used as Voice or Sign Language Interpreters or be allowed to interpret for a parent when the minor child is the client's child. The use of family members or friends as interpreters could result in the breach of confidentiality or reluctance on the part of the beneficiaries to reveal personal information critical to their situation. A family member or friend may be used as a Voice interpreter (not a Sign Language Interpreter) if this approach is requested by the LEP client and the use of such a person does not compromise the effectiveness of services nor violate the beneficiary's confidentiality, and the beneficiary is advised that a free interpreter is available.

In the case of a deaf client, only a Certified Sign Language Interpreter shall be utilized unless another form of communication has been requested by the client and follows the guidelines set forth as a result of DCF's Deaf and Hard of Hearing Settlement Agreement/Policy.

An effective language assistance program ensures that written material that is routinely provided in English to applicants, clients and the public are available in regularly encountered languages other than English.

It is particularly important that vital documents be identified and translated into the non-English language of each regularly encounters LEP group eligible to be served or to be directly affected. It is important to note that in some circumstances verbatim translation may not accurately or appropriately convey the substance of what is contained in the written materials in English.

In order to ensure compliance with the Title VI obligations the Agency must meet the following requirements. To meet "safe harbor" requirements the Agency must meet the requirements of paragraphs one and two as stated below:

The covered entity provides translated written materials, including vital documents for each eligible LEP language group that constitutes ten percent or 3,000, whichever is less, of the population or persons eligible to be served or likely to be directly affected by the covered entity's program.

Regarding LEP language groups that do not fall within paragraph 1), but constitute five percent or 1,000, whichever is less, of the population of eligible persons to be served or likely directly affected, the covered entity ensures that, at a minimum, vital documents are translated into appropriate non-English languages of such LEP persons. Translation of other documents, if needed, can be provided orally, and

Notwithstanding paragraphs 1) and 2), covered entity with fewer than 100 persons in a language group eligible to be serve or likely to be directly affected by the covered entity's program, does not translate written materials but provides written notice in the primary language of the LEP language group of the right to receive competent oral translation of written materials.

New Construction or Alterations

New construction and alteration of facilities that provide public accommodation shall conform to the ADAAG.

Bid packages to contractors for new construction or major alterations shall include a copy of the ADAAG, and compliance thereof shall be included in the specifications of any new contract agreement given by the Director of Purchasing and Safety.

The Director of Safety, or designee, will conduct a survey of all public accommodation facilities, using ADAAG, and ensure that if the facilities do not meet the guidelines, plans will be drafted and submitted to the appropriate Chief Operating Officer, depending on program/location, Director of Human Resources and Vice President of Quality, Contracts and Compliance for future compliance. Structural modifications to achieve compliance that would require extra funding will be described in a transition plan and submitted to the appropriate Chief Operating Officer, depending on program/location, for inclusion in the annual budget.

Training

At the initial new hire orientation meeting, Human Resources will inform all new employees about the Accessibility Plan.

All appropriate staff will be provided with training to include: awareness of the needs of clients/applicants/employees with disabilities, community resource options, how to access auxiliary aids assistance technology, "Reasonable Accommodations" requirements for disabled employees, and equal opportunity employment.

Required Measures for Implementation

Accessibility will be publicized and promoted through publications, position advertisements, brochures, posters, pamphlets, meeting announcements and training materials: "No person shall, on the ground of age, color, handicap, national origin, race, religion, sex, or sexual orientation, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving or benefiting from federal financial assistance. For space limitations on some marketing materials and supplies throughout the agency, the following statement is provided:

"Services are provided without any discrimination in compliance with the Americans with Disabilities Act (ADA). We provide reasonable accommodations to all those with a disability as defined under the ADA"

Monitoring and improvement will be done through annual updates, client input, facility surveys, review of all special accommodation requests, complaint investigations, and other related compliance activities.

Any educational or informational materials relating to this plan that may be received by the Chief Operating Officers, Director of Human Resources, or Vice President of Quality, Contracts and Compliance, will be shared and distributed among the staff, clients, applicants, and employees. Dissemination of the plan and any internal reports pertaining to the status of the plan may be made only upon approval and review by the Chief Operating Officers, Director of Human Resources and the Vice President of Quality, Contracts and Compliance. A copy of the plan and subsequent revisions is distributed to the Leadership Team, Program Directors, and members of the

Compliance, and Risk Management and Safety Committees. Further, copies may be distributed to persons with disabilities or LEP clients upon request.

Human Resources will maintain and provide to the staff, when needed, a list of technical assistance and resources, including government and non-government organizations providing support and referral programs for persons with disabilities.