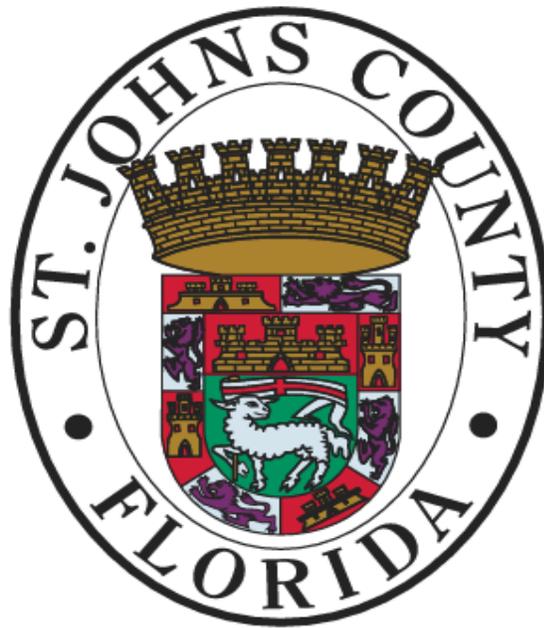


**St. Johns County  
Community Development Block Grant —  
Disaster Recovery  
Auxiliary Aids Plan for Persons with  
Disabilities**

February 8, 2019  
September 26, 2019



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## GENERAL

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This plan provides for the implementation of Community Development Block Grant- Disaster Recovery (CDBG-DR) policies and establishes procedures for the provision of auxiliary aids ensuring accessibility to all programs, services, and employment to persons with disabilities. The policies and procedures described in this plan apply to all programs administered by St. Johns County. Contracted service providers providing direct services to clients or potential clients shall develop a similar plan to ensure compliance with all civil rights laws.

## VERSION HISTORY

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Version	Date	Page	Description
#1	02/08/2019	NA	NA
#2	09/26/2019	NA	NA
#3			

## VERSION POLICY

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Version history is tracked in the table above with notes regarding version changes. The dates of each publication are also tracked in this table. The first version of this document is 1.0.

Substantive changes within this document that reflect a policy change will result in the issuance of a new version 2.0, an increase in the primary version number. Future policy changes will result in additional revision and issuance of a new primary version number.

Non-substantive changes within this document that do not affect the interpretation or applicability of the policy (such as minor editing or clarification of existing policy) will be included in minor version updates denoted by a sequential number increase after the primary version number.

## POLICIES

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St. Johns County (County) will provide appropriate auxiliary aids to persons with disabilities where necessary to afford such persons an equal opportunity to participate in or benefit from programs, services, and employment. Examples include Braille and taped materials, interpreters, readers, listening devices, television decoders, visual fire alarms using strobe lights, captioned films, and other assistive devices for persons with impaired hearing or vision.

All qualified and potential clients are entitled to an equal opportunity to use and benefit from the programs and services of the department and its contracted service providers. This includes reasonable accommodations to ensure that programs and services are equally accessible to and equally effective for otherwise qualified persons with disabilities who have hearing, vision, or mobility impairments.

Auxiliary aids or language interpreters will be available for use by clients, potential clients, employees, and applicants with impaired sensory, manual, or speaking skills in each phase of the service delivery or employment process (e.g., telephone inquiries, requests, intake interviews, employment interviews, term and conditions of employment, service provision, counseling, and complaints, etc.) at no cost.

All employees are responsible for ensuring equal accessibility and equally beneficial services to all clients and potential clients of the County.

## **PROCEDURES**

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The following procedures are to be followed by all employees to ensure accessibility of programs and services to clients or potential clients with disabilities.

- Assessment of client, employee, or applicant needs by consulting with the individual concerning his or her preferred communication mode and, if applicable, with assigned caseworkers, counselors, parents, family members, guardians, or other County representatives.
- The communications options for hearing impaired persons may include but are not limited to TDD (telecommunication devices for the deaf), fax (telephone facsimile transmittal), phone amplifiers, sign language interpreters, flash cards, lip reading, written notes, supplementary hearing devices, charts, signs, or a combination of these.
- The administrative official with budget approval or designee has the responsibility for approving the request and obtain the appropriate auxiliary aid or interpreter.
- Auxiliary aids or interpreters will be provided within two days of request or as otherwise required. Delaying services is not always practical or appropriate; therefore, provision will be made when advance notice for an aid or interpreter is provided. Client files will be documented to indicate if an aid or interpreter is needed. If so documented, the County will arrange to have the auxiliary aid or interpreter available for advanced scheduled appointments.
- The use of auxiliary aids or interpreter will be at no cost to the client, employee, or applicant. Auxiliary aids or interpreters will normally be obtained within the County or provider's current resources, including the use of qualified volunteers and volunteer organizations. However, if an auxiliary aid of an interpreter is required and services must be purchased, payment will be made from the appropriate operating budget.
- Some persons who are deaf or hard of hearing may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the person will not be used as interpreters, as issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. Competent interpreter services will be provided by the Program.

Other interpreter services will be used as a supplemental system when an interpreter is not available or when services are needed for an unusual or infrequently encountered language.

- If an auxiliary aid is found to be ineffective, the staff should immediately determine which mode of communication with the client the client would then prefer. The staff should be well versed in other auxiliary aids communication options and offer these

options to the client so that the client can have all the information available to make the choice. Staff should continue to work with the client to determine the best mode of communication. Documentation shall be made in the client's file regarding the attempt to improve the effectiveness of auxiliary aids and services.

- Documentation, with supporting justification, must be made if any request was not honored. The Program Manager or designee is the only person who can deny auxiliary aid requests made by a client or companion. Copies of documentation will be placed in homeowner file. If a staff person is not familiar with an auxiliary aid request, contact the Case Manager for information as well as ask the client for any information needed to secure this aid but reiterate that the cost of any auxiliary aid is the responsibility of the County and not the participant. The staff should work with the client and the Program Manager or designee to determine the best auxiliary aid to utilize to ensure appropriate communication services.

## **NOTIFICATION**

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The County will post auxiliary aid availability, non-discrimination poster(s), and Limited English Proficiency (LEP) information in the building's reception and lobby areas as well as in the intake center.

## **MONITORING**

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On an annual basis, St. Johns County staff will update this plan as needed to reflect any change in the plan based on the prior year's activity and to ensure relevancy and quality control of services.

## **RESOURCES AND TRAINING**

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Auxiliary aids will normally be obtained within the County's current resources. Staff will be trained on how to assist persons who are sensory and mobility impaired.

Appendix A provides instructions on in-person communication skills for staff who may interact with individuals who are deaf, hard of hearing, have speech impediments, physical disabilities, dual sensory impairments, or are visually impaired.

## **APPENDICES**

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### **Appendix A: Instructions on In-Person Communication Skills for Staff**

#### **1. INTERACTING WITH INDIVIDUALS WITH PHYSICAL DISABILITIES**

As with all people, persons with physical disabilities have specific needs. Please use the following guidelines when communicating with a person with mobility or physical impairment:

- Do not make assumptions about what the person can or cannot do. Always ask if the person would like assistance before you help. Your help may not be needed or wanted.
- Do not touch a person's wheelchair or grab the arm of a person walking without first asking if he or she would like assistance.

- Do not hang or lean on a person's wheelchair because it is part of the wheelchair user's personal space.
- Never move someone's crutches, walker, cane, or other mobility aid without permission.
- When speaking to a person in a wheelchair for more than a few minutes, try to find a seat for yourself so the two of you are at eye level.
- Speak directly to the person in a wheelchair, not to someone nearby as if the wheelchair user did not exist.
- Do not demean or patronize the wheelchair user by patting him/her on the head.
- Do not discourage children from asking questions about the wheelchair. Open communication helps overcome fearful or misleading attitudes.
- When a wheelchair user transfers out of the wheelchair to a chair, car, or bed, do not move the wheelchair out of reach.
- Do not raise your voice or shout. Use normal speech. It is OK to use expressions like "running along". It is likely that the wheelchair user expresses things the same way.
- Be aware of the wheelchair user's capabilities. Some users can walk with aid and use wheelchairs because they can conserve energy and move about quickly.
- Do not classify persons who use wheelchairs as sick.
- Do not assume that using a wheelchair is in itself a tragedy. It is a means of transportation/freedom that allows the user to move about independently.

## **2. INTERACTING WITH INDIVIDUALS WHO ARE BLIND OR HAVE LOW VISION**

Persons who are blind or have low vision have specific needs. Please use the following guidelines when communicating with persons who are blind or have low vision:

- The first thing to do when you meet a blind person is to identify yourself.
- When speaking, face the person directly. Speak in a normal tone; your voice will let the person know where you are.
- Do not leave without saying that you are leaving.
- Some individuals who want assistance will tell you. You may offer assistance if it seems needed, but if your offer is declined, do not insist.
- When offering assistance, say, "Would you like to take my arm?" and allow the person to decline or accept. The movement of our arm will let the person know what to expect. Never grab or pull the person.
- When going through a doorway, let the person know whether the door opens in or out and to the right or left.
- Before going up or down stairs, let the person know that you are going up or down, and advise if there is a handrail and where it is. Ask the person if he or she would like assistance; he or she would let you know.

- When giving directions or describing where things are in a room or in the person's path, be as specific as possible, and use clock clues where appropriate.
- When directing the person to a chair, let the person know where the back of the chair is.
- If the person has a service animal, do not distract or divert the animal's attention. Do not pet or speak to the animal unless the owner has given you permission.
- The person's single greatest communication need is to have access to visual information by having the information either read or provided in an accessible format (e.g., Braille, audio).

### 3. INTERACTING WITH INDIVIDUALS WITH DUAL SENSORY LOSS

The means of communication with a person with dual sensory loss will depend on the degree of hearing and vision loss. Use all of the suggestions in the above sections. The person with dual sensory loss has unique and very challenging communications needs. Staff is to use every possible means of communication available.

#### Appendix B: Definitions

**Accommodation to Persons with Disabilities:** It is the obligation of the County to make reasonable accommodations for a client, or potential client's physical and mental limitations. Exception: If the accommodation clearly affects the safety and efficiency of the organization or substantially affects costs, the accommodation is not required.

**Americans with Disabilities Act (ADA)/Section 504 Coordinators:** Any individual charged with implementing the requirements of Titles I and II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act, ensuring the provision of auxiliary aids and services for deaf or hard of hearing, limited English proficient customers/clients, and customers with disabilities requiring aid essentials. Within the State of Florida, Department of Children and Families, Civil Rights Officers are designated ADA/Section 504 Coordinators

**Americans with Disabilities Act (ADA) of 1990, as amended:** Comprehensive law which prohibits discrimination against people with disabilities in employment (Title 1), in public services (Title II, in public accommodations (Title III) and in telecommunications (Title IV). The ADA amendments of 2008 expanded the scope of the ADA to be consistent the Congressional intent of the original law.

**Applicant:** A person seeking either employment or services from the County but not yet hired or determined eligible for a program or service.

**Assistive Listening Devices and Systems (ALDS):** Term for amplification systems used to improve hearing ability in large areas and in interpersonal communications systems. These systems deliver the desired signal directly to the ears or hearing aids of the listener, thus overcoming the negative effects of noise, distance, and echo. Four main types are available: hardwire, loop, infrared, and FM.

**Auxiliary Aids and Services:** The wide range of services (e.g., sign language, interpreters, captioning, Braille, note taking, texting, internet) and devices (e.g., assistive listening systems, page magnifiers, TTYs/TDDs, voice output computer hardware/software, communication boards, speech synthesizers) used to ensure effective communication, which applies to both

aural and visual modes. This term does not apply to permanent physical renovations, alterations and construction, such as providing parking spaces, ramps, widening doors, etc. It is only used in the context of effective communication. The type of aid or service will vary according to the complexity of the communication and the needs of the person with a disability.

**Blind:** See Visual Impairment.

**Captioning (Closed):** Refers to converting the spoken word to text displayed in the visual media (videos, television, etc.) in a way that it is available only to individuals whose televisions are equipped with captioning decoders.

**Captioning (Open):** Refers to converting the spoken word to text displayed in the visual media (videos, television, etc.) so that it is seen by everyone who watches the film (it cannot be turned off)

**Captioning (Real Time):** The simultaneous conversion of spoken words to text, through computer-assisted transcription or court reporting, and displaying that text on a video screen. This communication service is beneficial to individuals with hearing impairments that do not use sign language or for whom assistive listening devices and systems are ineffective.

**Certified Interpreter:** A person who is certified by the National Registry of Interpreters for the Deaf or other national or state interpreter assessment and certification program.

**Civil Rights Officer:** Employee responsible for investigations, compliance monitoring and review, technical assistance, and coordination of civil rights activities.

**Client:** As used in this plan, this term means anyone applying for or participating in the employment process, program services, or activities. It includes persons making general inquiries or in any way seeking to access to or receiving information from the County, either in person, in writing, or via telecommunications.

**Communication Disabilities:** A comprehensive term which includes hearing impairment, speech impairment (for aural, oral communication), visual impairment, or other disabilities that present impairment to reading (for written, visual communication).

**Deaf:** A term used to describe a person having a permanent hearing impairment and being unable to discriminate speech sounds in verbal communication, with or without the assistance of amplification devices.

**Disability:** A condition that substantially limits a major life activity, such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, lifting, sleeping, and working.

**Dual Sensory Impairment:** A term used to describe a person having both a visual impairment and a hearing impairment. The term includes all ranges of loss, which would necessitate the use of auxiliary aids and services for communication.

**Employee:** All persons working for the County.

**Florida Relay Service:** The Florida Relay Service (FRS) which was implemented in 1992, is a service offered to all persons in the state which enables a hearing person to communicate with a person who is hearing or speech impaired and must use a TT/TTY, through a specially trained operator called a communications assistant.

**Hard of Hearing:** A term used to describe a person having a permanent hearing impairment, which is severe enough to necessitate the use of auxiliary aids or services to discriminate speech sounds in verbal communication.

**Hearing Impairment:** This is an all-inclusive term to describe any hearing loss. A person with a hearing impairment could be either deaf or hard of hearing. It is inappropriate to use the term to exclusively mean deaf or to exclusively mean hard of hearing. For example, it is inappropriate to say “persons who are deaf or hearing impaired”. The correct statement would be “persons who are deaf or hard of hearing” or “persons who are hearing impaired.”

**Manager:** As used in this plan, this term means an County employee at the supervisory level or above who is responsible for supervising staff or an County function and for the physical space in which such staff or program operates.

**Manual Disability Impairment:** A term used to describe a condition, which limits or prevents the use of a person’s upper extremities (arms, hands).

**Mental Disability Impairment:** The ADA defines this as a term, which includes mental or psychological disorders such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

**Mobility Impairment:** For the purpose of this plan, this term is used to describe a condition that substantially limits a person’s upper or lower body mobility. It includes those persons who have limited use of arms, shoulders; persons who are in wheelchairs or on crutches; people of short stature: those who cannot perform certain hand movements or have difficulty controlling movement; and people with breathing difficulties or stamina limitations. It also includes persons with visual impairments.

**Physical Disability:** This is a broad term which includes physiological disorders or conditions, cosmetic disfigurement, and anatomical loss. It includes, but is not limited to: orthopedic, visual, speech, and hearing impairments, cerebral palsy, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, HIV disease (symptomatic or asymptomatic), tuberculosis, drug addiction, and alcoholism.

**Print Impairment:** An organic condition or disability that leads to an inability to use traditional printed material (10-12 point print). This term includes persons with visual impairments, physical disabilities that result in an inability to hold or turn pages of a book (e.g., arthritis, cerebral palsy, muscular dystrophy, multiple sclerosis, stroke, paralysis, amputation, and learning disabilities (e.g., dyslexia).

**Program Accessibility:** An ADA standard which means a public entity’s program, services, or activities, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities. The concept of program accessibility is intended to make the contents of the program, service or activity equally available and accessible to persons with disabilities without excessive renovations of facilities. This allows and encourages the provision of alternative-but equally beneficial-means of providing the program service or activity. Programs, services, and activities include everything the County does. (See also: Undue Burden)

**Qualified Interpreter:** The ADA defines qualified interpreter as a person who is able to interpret effectively, accurately, and impartially both receptively (i.e., can understand what both persons in the conversation are signing and saying) and expressively (i.e., can then sign or say to the other person what it is being said or signed), using any necessary specialized

vocabulary. For example, in order to be qualified in a legal setting, the interpreter would have to be familiar with legal terminology used; in order to be qualified in a medical or mental health setting, the interpreter would have to know medical and psychiatric or psychological terms used in that setting.

**Reasonable Accommodation:** A term, used in conjunction with employment, meaning any change or adjustment to a job or work environment that permits a qualified applicant or employee with a disability to participate in the job application process, to perform essential functions of a job, or to enjoy benefits and privileges of employment equal to those enjoyed by employees without disabilities. An Accommodation would be considered reasonable unless such change or adjustment imposes an undue hardship on the responsible entity. (See “Undue Hardship”)

**Staff:** As used in this plan all employees of the County other than managers

**Sensory Impairment:** This is a general term used to describe impairment of vision or hearing. For the purposes of this document, it also includes impairment of speech.

**TTD/TTY/TT:** Terms used to designate a text telephone, a typewriter-like device used to transmit conversation across telephone lines. In this document, this device will be referred to as a TDD/TTY.

**Undue Burden:** This term, used in conjunction with programs and services (ADA Title II) means an unreasonably excessive financial cost or administrative inconvenience in making alterations to buildings or facilities in which programs, services or activities are conducted, in order to ensure equal benefit to persons with disabilities.

Note: Program access requirements of ADA Title II should enable individuals with disabilities to participate in and benefit from the programs, services and activities of public entities in all but the most unusual cases. Determination of undue burden can be made only by the County’s Program Manager or his/her designee, after considering all resources available for use in the funding and operation of the program, service or activity and must be accompanied by a written statement of reasons for reaching that determination. The public entity must take any other action that would nevertheless ensure the individual with the disability receives equal benefit from the program, service or activity.

**Undue Hardship:** This term in conjunction with employment, means significant difficulty or expense relative to the operation of a public entity’s program. Where a particular accommodation would result in an undue hardship, the public entity must determine if another equally appropriate accommodation is available which would not result in an undue hardship and provide that accommodation. Only the Program Manager or his/her designee may determine undue hardship.

**Visual Impairment:** A generic term used to describe all loss of vision that, although supplemented with corrective lenses, requires auxiliary aids or services, such as Braille, large print, computer disks, taped material, or qualified readers.

