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POLICY:

United Way of Broward County (UWBC) recognizes that all potential and current clients are entitled to an equal opportunity to use and benefit from the programs and services of the agency including meaningful communication involving their personal and family needs. This includes reasonable accommodations to ensure that programs and services are equally accessible to and equally effective for otherwise qualified persons who have visual and/or hearing impairments, and/or Limited English Proficiency (LEP). This policy also provides for communication of information contained in vital documents, including but not limited to client consent forms, client’s rights and responsibilities statement and client grievance procedures.

Auxiliary aids will be available for use by consumers and potential consumers in each phase of the service delivery process (e.g., telephone inquiries, requests, intake interviews, service delivery, counseling, complaints, testing, treatment, and training, etc.). All interpreters, translators and other reasonable auxiliary aids needed to comply with this policy shall be provided without cost to the person being served; clients and their families will be informed of the availability of such assistance free of charge.

A list of certified sign-language and qualified foreign language interpreters will be maintained by the UWBC Special Point of Contact (SPOC) and will be accessible to all staff should it be needed.

Training:

Training is essential to the on-going success of providing auxiliary aids and services to persons with disabilities or those who are Limited English Proficient. New employee orientation will include training on CFOP 60-10, Chapters 1, 3 and 4, Title II of the Americans with Disabilities Act of 1990, CFOP 60-16, Methods of Administration, and Section 504 of the Rehabilitation Act of 1973. This will be accomplished within 60 days of commencing employment for staff providing direct client services. All staff will receive refresher training, annually, on how to aid persons with disabilities and persons who are Limited English Proficient. Training will include:

1. Procedures for serving customers and companions who are deaf, hard of hearing, low vision, blind, and people who have mobility limitations.
2. Procedures for serving clients who are Limited English Proficient.
3. Awareness of Deaf and Hard of Hearing; speech limitations; low vision and blindness; reading limitations and dyslexia; and mobility limitations.
4. Available communication options.
5. How to provide reasonable accommodation(s) for customers and potential customers, i.e., how to access or purchase auxiliary aids, interpreter services and physical modifications.
6. Requirements for making meetings, conferences and services accessible.
7. Awareness of the Auxiliary Aids and Service Plan, including how to access the Plan.

PROCEDURES:

The following procedures are to be followed by employees and Contracted Client Services Providers to ensure accessibility of programs and services to customers or companions with visual and/or hearing impairments, and/or Limited English Proficiency (LEP).

For Persons who are Deaf and Hard of Hearing:

1. Staff will conduct an assessment, prior to services, to determine the customer or companion's preferred method of communication. Staff shall consult with the customer to determine his or her preferred communication method, and if applicable, with assigned caseworkers, counselors, parents, family members, guardians or other representative. Staff shall accomplish this by first completing the Customer Companion Communication Assessment Form and the Request for or Waiver of Free Communication Assistance Form.
2. The communication options for persons who are Deaf and Hard of Hearing may include but not limited to the CART, Florida Relay Service, VRS, VRI, TDDs (Telecommunication Devices for the Deaf), FAX (Telephone Facsimile Transmittal), phone amplifiers, qualified or certified sign language interpreters, flash cards, lip-reading, written notes, supplementary hearing devices, charts, signs or a combination of these, as appropriate.
3. If an interpreter is needed, staff shall contact a certified interpreter from their listing of interpreter services. Staff shall obtain verification of the interpreter's certification as defined in section 9.i.
4. UWBC or its Contracted Client Services Provider's official (or designee) with budget approval over the unit or facility, has the responsibility for approving the request and obtaining the appropriate auxiliary aid and service.
5. The use of auxiliary aids, certified sign language interpreters, or translators will be at no cost to the customer or companion.

6. Documentation of Customer Companion Communication Assessment form shall be recorded in the case file or record.
7. Each customer or companion who are Deaf and Hard of Hearing shall be provided a Customer Companion Feedback form by the Single Point of Contact, or designee, following their visit. The Customer Companion Feedback form is provided to the customer or companion to determine the effectiveness and appropriateness of the auxiliary aid or service provided and the performance of the interpreter provided. Staff shall document the case notes indicating the form was provided. Staff will provide assistance, if requested, in completing the form.

For Persons who have Low Vision or Blind (Except those that are Deaf and Hard of Hearing):

1. It is a common perception among the public that persons who are blind read Braille. Most persons who are legally blind do not use Braille as a reading medium. Among legally blind students registered as such by the American Printing House for the Blind, only 10 percent use Braille as their primary reading medium. It is estimated that 8 percent of all legally blind adults are able to use Braille.
2. It is important that staff determine the best method of communication for persons who have low vision or blind. While Braille may be offered as an alternative, always communicate with the customer to determine the best method of providing services to them in an effective manner.
3. Staff shall document in the client's file the type of auxiliary aid and service provided during their contact with the client.

For Persons who have Sensory, Speech or Mobility Limitations:

The following are procedures and minimum requirements for ensuring accessibility of meetings, conferences and seminars.

1. Facilities used for meetings, conferences and seminars will be reviewed for accessibility by the unit sponsoring the activity in coordination with the designated 504/ADA Coordinator.
2. When meetings, conferences and seminars are scheduled, information will be included in advertisements, conference registration materials or meeting notices that participants will be provided with the necessary auxiliary aid at no cost to them. The information will include the name of a contact person and a date by which the person must request such assistance. The registration process will include a method for determining the number and type of persons with disabilities needing assistance as well as the type of personal assistance or accommodation requested.
3. Certified or qualified interpreters for persons with speech, sensory or mobility limitations and accessibility to Teletype (TTY) or Telecommunications Device for Deaf (TDD) equipment.
NOTE: When telephones are provided for use by participants or residents (customers, employees or the public), TTYs/TDDs must be provided for participants or residents who are Deaf and Hard of Hearing.
4. Adequate lighting in meeting rooms so signing by an interpreter can be readily seen.
5. Readers or recordings to enable full participation by person with visual limitations.
6. Agenda and other conference materials translated into usable form.
7. Parking spaces clearly marked with appropriate ramps and curb cuts will be provided for persons with disabilities.
8. Where parking is available on or adjacent to the site, one 96" wide space with a 60" access aisle shall be set aside for the car of each participant, with mobility limitations, requesting it in advance of the meeting. Two accessible parking spaces may share a common access aisle.

9. Where parking is not available on or adjacent to the site, valet parking or other alternative accommodation for participants with mobility limitations will be provided.
10. Entrance ramps will be available and appropriate (36" wide or wider, level with adjacent surface and a manageable slope or incline of no more than one-inch rise per foot, 1:12).
11. Meeting rooms will be all on one level or capable of being reached by elevators or ramps that can be independently traversed by a participant with mobility limitations.
12. Stages, platforms, etc., to be used by persons in wheelchairs will be accessible by ramps or lifts.
13. Seating arrangements for persons in wheelchairs will be adapted to integrate persons who are mobility limited rather than to isolate them on the group's perimeter.
14. Sufficient accessible guestrooms (at the same rate as guestrooms for other participants) will be located in the facility where the meeting, etc., is held or in a facility housing the other participants.
 - One unobstructed entrance to each facility.
 - Doors operable by single effort.
 - Door handles no more than 48" from floor.
15. Elevator provided, if over one story:
 - Sensitive safety edges provided.
 - Controls no more than 48" from floor.
 - Controls with Braille numbers or letters.
 - Accommodates wheelchair 29" X 45".
16. Accessible restrooms:
 - Level access for each sex on each floor.
 - Turn around space 5' X 5'.
 - Door clearance of 32".
 - Grab rails provided.
 - Shelves, racks, dispensers, etc., not more than 48" for forward reach or 54" for side reach.
 - Restroom signs indicating accessibility.
17. Wheelchair accessible telephones.
18. Accessible drinking fountains with cup dispensers.
19. Audible and visible fire alarms.

NOTE: Staff shall ensure that written documentation of accessible accommodation is properly documented.

Ensuring Language Access for the Provision of Services Provided:

It is important to understand how individuals who are Limited English Proficient (LEP) interact with UWBC and its Contracted Client Services Providers. Examples may include, but not limited to:

1. Program applicants and participants
2. Hotline or information calls
3. Outreach programs
4. Public meetings and hearings
5. Public access to the UWBC's website
6. Written materials or complaints sent
7. Brochures intended for public distribution
8. Testing

Provide notices to LEP persons letting them know that language access services are available and that they are free of charge. This notice should be provided in a language that the LEP person will understand.

This will include:

- Posting signs in intake areas and other entry points. When language assistance is needed to ensure meaningful access to information and services. It is important to provide notice in the appropriate language in intake areas or initial points of contact so that LEP person can learn how to access those language services. The signs should be translated in the most common language encountered.
- Starting with outreach documents that language services are available from the agency. Announcements could be in brochures, booklets, and in outreach and recruitment information.
- Utilize a telephone voice mail menu. The menu could be in the most common languages encountered. It should provide information about available language assistance services and how to get them.

Translation of Written Materials:

Translating documents to ensure effective communication will depend upon the customer or companions preferred method. Staff may be required to translate written documents in Braille, taped recordings or large print to ensure equal access to services offered by UWBC.

Written material (vital documents) routinely provided in English to applicants, clients and the public should be available in regularly encountered languages other than English. It is vital that documents be identified and translated into the non-English language of each regularly encountered Limited English Proficient group eligible to be served or to be directly affected. Each program office will ensure that non-English written materials, such as program forms, brochures, etc., are available to operational staff.

Competency of Interpreters and Translators:

UWBC employees who are utilized to interpret for the Deaf and Hard of Hearing by American Sign Language (ASL) shall meet or exceed the education and communications skills established by the following:

1. An assessment by an independent testing agency of an employee's ASL skills is required prior to utilizing an employee to interpret for a client or companion who is Deaf and Hard of Hearing.
2. Interpreter credentials as awarded by The Registry of Interpreters for the Deaf and modified for UWBC's use are incorporated for reference CFOP 60-10, Chapter 3, Attachment 3.
3. It is the responsibility of managers, supervisors, and staff to become familiar with and follow the standards of etiquette when communicating with customers/clients with disabilities.
4. It is the responsibility of program managers and supervisors to ensure the competency of qualified and certified sign language interpreters.

When providing oral assistance you must ensure competency of the language service provider. Competency requires more than self-identification as bilingual. Some bilingual staff and community volunteers, for instance, may be able to communicate effectively in a different language when communicating information directly in that language, but may not be competent to interpret in and out of English. Likewise, they may not be able to do written translations.

Competency to interpret, however, does not necessarily mean formal certification as an interpreter, although certification is helpful. When using interpreters, staff should ensure that the interpreter:

1. Demonstrate proficiency in and ability to communicate information accurately in both English and in the other language and identify and employ the appropriate mode of interpreting (e.g., consecutive, simultaneous, summarization, or sight translation);
2. Have knowledge in both languages of any specialized terms or concepts peculiar to the program or activity and or any particular vocabulary and phraseology used by the LEP person;
3. Understand and follow confidentiality and impartiality rules to the same extent the UWBC employee for whom they are interpreting and/or to the extent their position requires;
4. Understand and adhere to their role as interpreters without deviating into role as counselor, legal advisor, or other roles (particularly in court, administrative hearings, or law enforcement contexts),
5. Be able to show sensitivity to the person's culture.

If bilingual staff is used to interpret between English speakers and LEP persons, or to orally interpret written documents from English into another language, they should be competent in the skill of interpreting. In addition, there may be times when the role of the bilingual employee may conflict with the roles of an interpreter.

Effective management strategies, including any appropriate adjustments in assignments and protocols for using bilingual staff, can ensure that bilingual staff is fully and appropriately utilized. When bilingual staff cannot meet all of the language service obligations, then other options should be used.

It is the responsibility of program managers and supervisors to ensure the competency of foreign language interpreters.

It is the responsibility of managers, supervisors, and staff to become familiar with and follow the standards of etiquette when communicating with clients who are Limited English Proficient.

Provision of Interpreters in a Timely Manner:

When interpretation is reasonable and is needed, staff shall provide interpreters in a timely manner. To be meaningfully effective, language assistance should be timely. While there is no single definition for "timely" applicable to all types of interactions at all times by all types of recipients, one clear guide is that the language assistance should be provided at a time and place that avoids the effective denial of the service, benefit, or right at issue or the imposition of an undue burden on or delay in important rights, benefits, or services to the LEP person.

The client's file shall be documented identifying the auxiliary aid or services provided, as well as any future services needed to ensure effective communication.

When language assistance services are not readily available at a given agency, LEP persons will be less likely to participate in or benefit from its programs and services. As a result, many LEP persons may not seek out agency benefits, programs, and services; may not provide beneficial information or file complaints; and may not have access to critical information provided by the agency because of limited access to language assistance services. Thus, self-assessments of the number of current LEP contacts may significantly underestimate the need for language services. Crime perpetrators can also take advantage of this misconception and discourage their victims from seeking law enforcement or prosecutorial protection.

Staff shall provide interpreters for customers and companions who are Deaf and Hard of Hearing in a timely manner in accordance to the following standards:

1. If it is a scheduled appointment, you must have a certified interpreter at the time of the scheduled appointment. If the interpreter fails to appear, staff shall take whatever additional actions are necessary to make a certified interpreter available to the customer or companion as soon as

possible, but in no case later than two (2) hours after the scheduled appointment, or as convenient to the customer or companion.

2. If it is a non-scheduled appointment or non-emergency situation, you must provide a certified interpreter within two (2) hours of the request, or at least by the next business day. In emergency situations, an interpreter shall be made available as soon as possible, but in no case later than two (2) hours from the time the customer or companion requests an interpreter, whichever is earlier.
3. Non-Scheduled Interpreter Requests. If the situation is not an emergency, staff shall offer to schedule an appointment (and provide an interpreter where necessary for effective communication) as convenient to the customer or companion, but at least by the next business day.
4. Scheduled Interpreter Requests. For scheduled 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 certified interpreter available to the customer or companion who is Deaf and Hard of Hearing as soon as possible, but in no case later than two (2) hours after the scheduled appointment.

Other Means of Communication:

Staff shall continue to try to communicate with the customer or companion who is Deaf and Hard of Hearing and/or LEP insofar as the customer or companion seeks to communicate, between the time an interpreter is requested and the time an interpreter arrives.

1. Sign language interpreters must be certified, unless they are a UWBC employee who has been determined qualified by an Independent Agency.
2. The use of assistive devices (vibratory alarms) will be incorporated with relevant services (tactile communication) for persons with multiple disabilities such as deafness and blindness.
3. Language services include, as a first preference, the availability of qualified bilingual staff that can communicate directly with clients in their preferred language.
4. When bilingual staff is not available, the next preference is face-to-face interpretation provided by a qualified contracted or volunteer language interpreter.
5. Telephone interpreter services should be used as a supplemental system when an interpreter is not available, or when services are needed for unusual or infrequently encountered language.
6. If the individual declines the use of the sign language interpreter, or other auxiliary aids, the client's file must be noted, utilizing the Customer or Companion Request For Free Communication Assistance or Waiver of Free Communication Assistance form. The use of this form does not waive UWBC or its Contracted Client Services Providers' responsibility to ensure effective communication; meaning the client's right to waive services does not void the agency from obtaining an interpreter to ensure effective communication is occurring.
7. Minor children should never be used as an interpreter.
8. Never use family members, children, friends and untrained volunteers as interpreters because it is difficult to ensure that they interpret accurately and lack ethical conflicts.

Effectiveness of Communication:

If communication is not effective or if the nature of the communication changes significantly after the initial communication assessment, UWBC or provider staff shall reassess which appropriate auxiliary aids and services are necessary for effective communication. This shall be accomplished where possible in consultation with the person seeking auxiliary aid or services.

Denial of Auxiliary Aids and Services:

1. If UWBC or provider staff determines after conducting the communications assessment that the communication situation is not Aid Essential and does not warrant provision of the auxiliary aid or service requested by the customer or companion, UWBC or provider staff shall advise the person of the denial of the requested service and shall document the date and time of the denial, the name and title of the staff member who made the determination, and the basis for the determination. UWBC or provider staff shall provide the customer (and companion, if applicable) with a copy of the denial.
2. Staff shall record the denial of the requested auxiliary aid or service on the Customer or Companion Communication Assessment and Auxiliary Aid/Service Record (form CF 761).
3. Staff shall also record the denial of requested service in the customer's case file or medical chart. Notwithstanding the denial, UWBC or provider staff shall nonetheless ensure effective communication with the Customer or Companion by providing an alternate aid or service which must be documented on the above mentioned form and in the customer's file. Denial determinations can only be made by the Regional Managing Director or Hospital Administrator (or designee) or the Contracted Client Services Provider Administrator (or designee).

NOTE: Staff who are unfamiliar with the auxiliary aid or service requested shall contact their Single Point of Contact (SPOC), 504/ADA Coordinator (Civil Rights Officer) or their Supervisor, for assistance in locating appropriate resources to ensure effective communication with clients, customers and companions.

The UWBC Single Point of Contact (SPOC) is:

Emilia Vilaire-Monchery
Vice President, Youth Opportunity
Phone: 954-453-3750
Email: evilaire@unitedwaybroward.org

APPLICABILITY: All staff

RESPONSIBILITY: All staff

RELATED STANDARDS:

- RPM 1
- TS 2.04