

Florida Sheriffs Youth Ranches, Inc.
Accessibility Plan in Accordance with
Title I, Title II, & Title III 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: November 2016
Revised: November 2015

In support of our mission and values as an organization, the Florida Sheriffs Youth Ranches is actively involved in maximizing accessibility of our facilities and service delivery, as well as providing the highest professional relationships for the youth in our care.

While The Youth Ranches strives to provide services at all hours, and with staff patterns designed to maximize easy access to services, we also recognize that barriers may present themselves in many forms that have the potential to impact persons served. 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, The Youth Ranches annually assesses, develops initiatives if needed, and initiates renovations and improvements to address these issues. In the event that barriers present themselves which may require extensive time and resources to address, a corrective action plan will be developed and monitored until the appropriate enhancements can be completed.

The Youth Ranches has a Risk Management and Safety Committee appointed at every facility that meets quarterly. It is the goal of each safety committee to identify safety and accessibility barriers at each site.

The Youth Ranches Accessibility Plan will be subject to revisions based on information and recommendations gathered through these Safety Committee meetings, along with solicited input from our clients through our Consumer Satisfaction Surveys.

This Accessibility Plan applies to all The Youth Ranches locations.

Purpose

The purpose of this Accessibility Plan is to ensure that:

1. Applicants with disabilities will have the same access to services 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 as clients without disabilities.
3. The agency will correct barriers, if readily achievable, that inhibit the free participation of individuals with disabilities in all of programs.
4. When required, the Agency will provide reasonable accommodations through Auxiliary Aids per the January 2010 HHS/DCF Settlement Agreement with the Deaf and Hard of Hearing, for applicants and clients with disabilities as long as these accommodations do not impose an undue hardship on the agency.
5. 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 those requirements. Likewise, alterations to existing facilities that provide accommodation will be in compliance with the ADAAG, except where the agency can demonstrate that it is structurally impractical to meet the requirement.

Areas of Potential Impact

Architectural:

As of the current revision of this Plan, all facilities owned or leased have been assessed for ADA compliance.

Environmental:

The Youth Ranches has a maintenance department for each program that is responsible for repairing any environmental issues identified by staff. Unit Directors at each facility are responsible for internal Health and Safety inspections as well as overseeing the general cleanliness and environmental condition of all buildings and grounds. This is additionally reviewed bi-annually through this Agency's Continuous Quality Development (CQD) program.

Safety regulations and precautions are strictly enforced and monitored to prevent slips/trips/ falls, fires, poor air quality and seasonal weather conditions. The Youth Ranches has designated smoking areas at all locations/facilities and prohibits smoking inside of any building. Staff and resident evacuation tests are administered monthly or quarterly in the case of office administration. Direct Care staff is also educated annually on the practices of blood borne pathogen containment and all staff participates in annual training in OSHA Safety Practices.

The Youth Ranches programs appoint staff to participate in the program's Safety Committee. These members meet quarterly to make recommendations that will create and enhance an environment that promotes safe conditions for the clients and staff.

Attitudinal:

The Youth Ranches strives to be faithful to the vision and mission of the Agency and its Board of Directors as well as to demonstrate consistency with respect to our published policies and procedures. The agency and the Board are structured and staffed to reflect the diverse needs of our customers, including providing services that are as geographically close to the client's home as possible. 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 populations. The Youth Ranches actively recruits, hires and trains employees and Board members from a culturally and racially diverse population. The Youth Ranches 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:

The Youth Ranches 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. The Youth Ranches will work to avoid creating financial barriers to essential treatment for persons served in its effort to prevent more serious illness or disability. The Youth Ranches staff will assist individuals enroll in Medicaid and related resources when the financial need exists.

The Youth Ranches is named as payee for private placements who receive Social Security Disability or Survivor benefits, but are too young to manage their funds. These funds are managed by our fiscal department and audited regularly to safeguard client's funds.

The Youth Ranches also provides comprehensive food clothing and board expenses along with most other expenses associated with education, recreation and any other needs associated with daily living activities. A working wage is also provided to all youth in compensation for work accomplished in our program.

Communication:

The Youth Ranches promotes ongoing communication with persons with disabilities by soliciting client input through satisfaction surveys. Stakeholder input is also solicited at Board meetings and among Florida's elected Sheriffs. Every client receives an opportunity for reasonable accommodations including a reader for those who are visually impaired. The Youth Ranches 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.

The Youth Ranches 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 will consult with District DCF offices for assistance in providing language interpreters for residents 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 Limited English Proficiency (LEP) clients who seek their services.

Our Agency's Youth and Family Rights Policy, Grievance Procedure and Discipline Policy are all translated into Spanish and posted in visible locations across all programs.

The Youth Ranches staff can access interpreter services, for both Limited English Proficiency and deaf and hard of hearing clients, within a 24 hour period.

Transportation:

The Youth Ranches provides transportation for all residents and will assist parents in coordinating planned home visits if needed. Should the need arise for handicap accessible transportation, the Youth Ranches will seek out local handicapped transportation resources, or acquire or modify its own vehicles to accommodate the client's needs.

Employment:

The Youth Ranches 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. The Youth Ranches actively recruits minority applicants by advertising positions in regional and national minority publications and minority recruitment sources. Employees who have a hearing impairment can be supplied with a Video Relay (VR) machines as well as a free Amplified Hearing Device. Any person determined to be Deaf shall be provided with a Certified Sign Language Interpreter, 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.

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 – There are three interpretations 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:**
 - d. **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. TDD access will be posted in all job vacancy advertisements.
 - e. **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 renovation and construction undertaken by the Youth Ranches will follow the rules, regulations and permitting processes of the municipalities 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. Each Program Director will designate a staff member (Usually a Unit Director) to act as the program's 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 The Youth Ranches Policy on records retention and destruction.

Reasonable Accommodation

If a client/applicant is visibly impaired at the time of application or admission; or has indicated that he/she has an impairment that requires accommodation, the receiving staff will provide the individual with a Customer or Companion Request for Free Communication Assistance form for completion. The program's assigned SPOC will also complete the Customer or Companion Communication Assessment. If the client/applicant is accompanied by a relative/guardian/friend/companion, the accompanying person will be asked if they would prefer to read the contents of the Customer or Companion Request and complete the form for the client applicant. If not accompanied by an interpreter, the receiving staff will read the form to the client/applicant and assist in completing the form. If client/applicant has any other impairments that prevent him/her from completing the form, assistance can be provided by the receiving staff. If the requested accommodation is an Auxiliary Aide, that accommodation should be provided as soon as possible.

If an applicant/client has requested participation in an activity, but cannot due to an architectural barrier, the program will make reasonable effort to remove that barrier, if readily achievable in accordance with the ADAAG Guidelines and advice or assistance from maintenance staff. If barrier removal is not readily achievable due to difficulty or expense, the barrier can remain in place as long as a safe alternative accommodation can be provided.

Upon admission, the Youth Ranches will make residents aware of the availability of Axillary Aid Hearing devices. If the applicant/client requests an Auxiliary Aid hearing device, one shall be provided immediately. The client will be free to keep their device and to have it with them during his

or her placement at the program. Each program will maintain a binder outlining resources, such as the Florida Relay Service, Video Remote Interpreting, Video Relay Interpreting and TDD/TTY.

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 by the hiring supervisor. If the applicant is selected for employment, the hiring supervisor will review any accommodations needed by the applicant and forward these requests to the Director of Human Resources and the respective Department Head if necessary.

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 and their respective Department Head if necessary.

Upon receipt of a request for accommodations, the hiring supervisor will determine if the request can be reasonably accommodated. Requests for accommodation will be reviewed on a case by case basis. If necessary this determination will be made in collaboration with the respective Department Head.

If the agreed upon accommodation is determined to be reasonable, such accommodation will be made by either the Program Director, Director appropriate Department Head. The Program Director will document what accommodation will be provided and submit copies to both the applicant and the Department of Human Resources.

If any additional accommodations are later determined by the employee as necessary, and can be readily achievable, the hiring supervisor should act on this request as soon as possible.

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 effect of the expense, or the impact of such accommodation upon the operation of the program; and,
3. The effect of the accommodation on the fundamental nature of the overall operation of the Youth Ranches business flow.

If the request for accommodation is received from a deaf or hearing impaired individual, the hiring supervisor will obtain the means of accommodating the employee in accordance with DCF's protocol regarding Effective Communication.

Limited English Proficiency 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 by consulting with the youth concerning his/her preferred communication mode and if applicable with the assigned caseworker, counselor, parent, or other family member, guardians, or other representatives.

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

While The Youth Ranches may have in its employ, bi-lingual employees, the next preference is a face-to-face interpretation provided by trained interpreters. In the absence of face-to-face

interpretation, the agency will contract with a telephonic language interpretation service.

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 youth and family (if available) that the service is available before documenting that the client has declined. The interpreter must be proficient in both English and the other language.

Minor children or siblings should never be used as voice or sign language Interpreters or be allowed to interpret for a parent. Staff should be aware that the use of family members or friends as interpreters could create difficulties regarding confidentiality or reluctance on the part of the youth or families to reveal personal information critical to their situation. However, 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.

Written policy material on discipline, youth and family rights and grievance resolution is routinely disseminated in Spanish; and should be prominently displayed in all cottages and other public areas where youth and families will encounter it.

In order to ensure compliance with the Title VI obligations the Agency must meet the following requirements 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), a covered entity with fewer than 100 persons in a language group eligible to be served or likely to be directly affected by the covered entity's program, is not required to translate written materials but will provide a 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.

Any major modifications of structures that do not comply with ADAAG must incorporate plans to address compliance.

Bid packages to contractors for new construction or major alterations shall include a statement that construction and renovation will comply with ADAAG, and compliance thereof shall be included in the specifications of any new contract agreement.

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, websites, position advertisements, brochures, posters, pamphlets, meeting announcements and training materials through the inclusion of the following statement:

"No person shall, on the grounds 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 throughout the agency, the following modified statement may be used:

"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.

Educational materials and updates on training requirements relating to this plan will be disseminated by the Director of Staff Development. Dissemination of this plan and any internal reports pertaining to the status of the plan will be the responsibility of the Director of Quality Improvement. A copy of the plan and subsequent revisions will be maintained on StarNet. Copies may also 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.