

**PUBLIC HOUSING and COMMUNITY
DEVELOPMENT**

**EFFECTIVE COMMUNICATION
POLICY**

APPENDIX II

OF THE

**ADMISSIONS AND CONTINUED
OCCUPANCY POLICY**

Effective 5-8-14
Revised 6-26-12

EFFECTIVE COMMUNICATION POLICY

Appendix II of the ACOP
Effective 5-8-14; Revised 6-26-12

It is the policy of the Public Housing and Community Development (PHCD) to ensure that communications with applicants, residents, program participants, employees, and members of the public with disabilities are as effective as communications with others.

PHCD, including its employees, agents, contractors and private management companies/agents, shall furnish appropriate auxiliary aids and services, where necessary, to afford individuals with disabilities, including individuals with hearing, visual or cognitive disabilities, an equal opportunity to participate in, and enjoy the benefits of, the programs, services and activities conducted by PHCD.

AUXILIARY AIDS AND SERVICES:

"Auxiliary aids and services" include, but are not limited to: (1) qualified sign language interpreters, note-takers, transcription services, written materials, telephone handset amplifiers, assistive listening devices, assistive listening systems, telephones compatible with hearing aids, closed caption decoders, open and closed captioning, telecommunications devices for deaf persons (TDDs), videotext displays, or other effective methods of making aurally delivered materials available to individuals with hearing impairments; and, (2) qualified readers, taped texts, audio recordings, Brailled materials, large print materials, or other effective methods of making visually delivered materials available to individuals with visual impairments.

REQUEST FOR EFFECTIVE COMMUNICATION:

When an auxiliary aid or service is required to ensure effective communication, PHCD will provide an opportunity for an individual with a disability to request the auxiliary aid or service of his or her choice. PHCD will give primary consideration to the choice expressed by the individual. "Primary consideration" means that PHCD will honor the choice, unless it can show that another equally effective means of communication is available; or, that use of the means chosen would result in a fundamental alteration in the nature of its service, program, or activity or in an undue financial and administrative burden.

The individual will submit his/her request for auxiliary aids or services to the appropriate PHCD staff person designated below. All requests shall be dated and time-stamped upon receipt by the appropriate PHCD staff person.

Within forty-eight (48) hours of receipt of the individual's request, the designated PHCD staff person will consult with the individual with the disability when the preferred type of auxiliary aid or service is not available or not required, and the staff person is attempting to ascertain whether an alternative means of communication will ensure effective communication.

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Within five (5) business days following receipt of the effective communication request(s), the designated PHCD staff person will provide the requesting individual with notification of the proposed auxiliary aid or service to be provided.

The ADA Coordinator will maintain copies of all requests for effective communication and, including final disposition, for the duration of this Agreement.

Individual requests for Effective Communication will be directed to the following PHCD officials:

Resident Requests:

PHCD resident requests for auxiliary aids or services should be made to the Site Manager at the resident's development.

Applicant Requests:

Applicants for PHCD housing should make requests for auxiliary aids and services to MDHA's Applicant and Leasing Center (786) 469-4300 phone, (305) 638-6014 TDD) or the ADA Coordinator (786) 469-2155 .

Other Requests:

Requests from members of the public who wish to participate in programs, services and/or activities of PHCD shall submit their request(s) for auxiliary aids and services as directed in PHCD notices, appointment notifications, forms, or brochures. They may also submit requests for auxiliary aids to the PHCD 504/ADA Coordinator.

However, individuals with disabilities who request auxiliary aids or services for public events such as public hearings, Board hearings, public meetings, etc., shall make their requests no later than five (5) days prior to the event.

GRIEVANCE PROCEDURES:

If the requesting individual with a disability is not satisfied with the PHCD's response to the individual's request(s) for an auxiliary aid or service, the individual may file a formal grievance, including appropriate supporting documentation, if any, with PHCD's Section 504/ADA Coordinator. The grievance may be communicated orally or in writing.

However, all oral grievances must be reduced to writing and maintained in PHCD's files. In addition, PHCD shall provide assistance to any individual who requests assistance in filing a grievance, including assistance in reducing the individual's grievance to writing. All grievances shall be dated and time-stamped.

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Within seventy-two (72) hours of receipt, PHCD's Section 504/ADA Coordinator will respond to the individual's grievance.

The Section 504/ADA Coordinator will provide his/her formal decision, in writing, within ten (10) business days after receipt of the grievance.

If the individual is dissatisfied with the PHCD Section 504/ADA Coordinator's determination, the individual may pursue remedies under PHCD's HUD-approved Grievance Procedures.