

POLICY AND PROCEDURES FOR EFFECTIVE COMMUNICATION FOR APPLICANTS OR PERSONS WITH DISABILITIES

POLICY:

The Golden Residences at The Village will take reasonable steps to ensure that persons with disabilities have equal access and an equal opportunity to participate in our housing development, in all common areas, their housing unit, services, activities and programs. The policy of *The Golden Residences at The Village* is to ensure meaningful communication with all applicants and residents.

The policy also provides for communication of information contained in vital documents, including but not limited to: income, assets, expenses, medical information, medical expenses, financial and insurance benefit and forms. The Administrator will be the responsible person to provide to the applicants and residents who are in need of the reasonable accommodation of interpreters, translators and other aids needed to comply with this policy and shall be provided without cost to the person being served, and their families will be informed of the availability of such assistance free of charge.

Individuals with Limited Spanish Proficiency (LSP) or other eligible applicants will be provided with language assistance through use of competent bilingual staff, staff interpreters, contracts or formal arrangements with local organizations providing interpretation or translation services, or technology and telephonic interpretation services. All staff will be provided notice of this policy and procedure, and staff that may have direct contact the individuals will be trained in effective communication techniques, including the effective use of an interpreter.

The Golden Residences at The Village will conduct a regular review of the language access needs of our resident population, as well as update and monitor the implementation of this policy and these procedures, as necessary.

Mr. Ivan Martinez Sterling, Administrative Coordinator, and designated Section 504 - ADA Coordinator, shall manage and oversee site Administrators' and Social Workers' efforts in inventorying sensory impaired individuals requiring assistive technologies and other special communication arrangements.

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PROCEDURES:

1. IDENTIFYING PERSONS WITH DISABILITIES

The Golden Residences at The Village will promptly identify the communication needs of the applicants and residents with any disabilities.

2. OBTAINING ADEQUATE INFORMATION

The Administrator and Social Worker (phone number(s) to be provided) are responsible for:

- (a) Maintaining an accurate and current list showing the name, language, phone number and hours of availability to contact the applicants or resident to provide the services needed;
- (b) Contacting the appropriate resources, specialist and/or obtaining mechanisms or equipment needed to assist the person, in the event that special communications are needed;
- (c) Obtaining an outside interpreter, if a bilingual staff or staff interpreter is not available or does not speak the needed language.

Lighthouse Translations & Interpretations or Atabex Translation Specialists Inc., in addition to other commercial qualified translation companies, have agreed, in principal, to provide qualified interpreter services, when necessary. As an example, the two listed company's telephone numbers and the hours of availability are listed below.

- Lighthouse Translations & Interpretations Contact Number 877-281-2495, available 24/7
- Atabex Translation Specialists Inc., Contact Number 787-756-6763, available 8:30 am to 5:30 pm M-F.

Sign language interpreter(s) can also be made available, where necessary.

Some disabled persons may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the disabled person will not be used as interpreters except exigent circumstances such as disaster emergencies. Family members or friends however always welcome to accompany disabled and/or LSP persons while translations and/or interpreter services are being provided.

Children and other clients/ residents will **not** be used to interpret, in order to ensure confidentiality and accurate communication.

3. PROVIDING WRITTEN TRANSLATIONS

The Administration of ***The Golden Residences at The Village*** will provide written translations, as follows:

- (a) When translation of vital documents is needed, each unit in ***The Golden Residences at The Village*** will submit documents for translation to English and any other "*frequently encountered*" languages to the Administrator.

Original documents being submitted for translation will be in final, approved form with updated and accurate legal and medical information.

- (b) Facilities will provide translation of other written materials, if needed, as well as written notice of the availability of translation, free of charge, for LSP individuals.

(c) *The Golden Residences at The Village* will set benchmarks for translation of vital documents into additional languages over time, where necessary.

4. PROVIDING NOTICE TO LSP PERSONS

The Golden Residences at The Village will inform persons of the availability of language assistance, free of charge, by providing written notice in languages persons will understand.

At a minimum, notices and signs will be posted and provided at points of entry, including but not limited to the common areas of *The Golden Residences at The Village*.

Notification will also be provided through one or more of the following:

- outreach documents,
- telephone voice mail menus,
- local newspapers
- radio and television stations, and/or
- Community-based organizations.
- "I Speak" Cards

5. MONITORING LANGUAGE NEEDS AND IMPLEMENTATION

On an ongoing basis, *The Golden Residences at The Village* will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures.

In addition, *The Golden Residences at The Village* will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LSP persons, and feedback from agencies and community organizations.

The availability and use of this policy does not prevent a person from filing a complaint with the the U.S. Department of Housing and Urban Development, San Juan Field Office, 235 Federico Costas Street, Suite 200, San Juan, P.R. 00918; 787-274-5834.