

ADA POLICY & PROCEDURE

POLICY

Pearl Periodontics P.C. shall be aware of the basic requirements of the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act and other applicable state laws and regulations that prohibit discrimination on the basis of disability, and will not discriminate against people with disabilities, including seniors with disabilities in the provision of medical services.

Procedures will be adopted that ensure that periodontic services provided for people with disabilities, at a minimum, will meet standards of accommodation required under applicable laws.

Any employee who recognizes that a person with a disability may have an issue that relates to the obligations of the practice under the ADA shall bring that information to the attention of her or his supervisor, the office manager, or Periodontic Director.

Pearl Periodontics P.C. shall provide accommodations for seniors and people with disabilities as defined by the Americans with Disabilities Act (ADA). Such accommodations include auxiliary aids and services that ensure effective communication with people who are deaf or hard-of-hearing, or who are blind or have visual impairments. Accommodations also include reasonable modification of policies, practices and procedures that do not fundamentally alter the nature of the services provided or that would result in an undue burden. Such modifications may range from making an exception to a “no pets allowed” policy for service animals to providing assistance for an individual with a mobility impairment even though the office typically does not provide such assistance.

With the exception of undue burden to the practice, the practice will not charge a patient for the cost of providing an auxiliary aid or service, either directly or through the patient’s insurance. The practice will take reasonable steps to ensure that all patients, including patients with communication disabilities, are informed of this accommodation policy.

PROCEDURE

In order to ensure that the practice has the capacity to provide appropriate and effective care to patients with disabilities, management will:

Identify a lead staff person who is responsible for arranging accommodations including, but not limited to:

- Modifying standard policies such as “no animals allowed” to permit service animals and appointment times and durations
- Arranging for use of the most accessible exam room, equipment or other facilities when required by a person with a disability
- Hiring Sign Language interpreters or identifying medical group or health plan resources for providing interpreters
- Arranging for print materials in alternative formats
- Purchasing or arranging for the use of accessible equipment such as a height-adjustable examination table and a wheelchair accessible weight scale or identifying medical group or health plan resources for providing such items or access to them
- Arranging lifting assistance

Identify local organizations with which the practice or the patient's medical group or health plan can contract for accommodations including, but not limited to:

- Sign Language interpreters
- Print materials, such as practice brochures, in alternative formats
- Rental, purchase or use of equipment and devices such as assistive listening devices and height-adjustable examination tables, or
- Other needed accommodations

Establish contracts or billing arrangements with key vendors or with the patient's medical group or health plan

Create a resource list of vendors or medical group or health plan contacts responsible for arranging accommodations that is included with these procedures

Make the resource list readily available to all staff

Update resource list as needed

Accommodating People with Mobility Disabilities

Some people who have mobility disabilities including people who use wheelchairs, scooters, walkers, crutches, canes, braces and prostheses may require a height-adjustable exam table that lowers to chair seat height, a wheelchair accessible weight scale, and/or assistance dressing, undressing and getting on to and off of the examination table or other examination equipment.

In order to ensure that the practice accommodates patients who have mobility disabilities:

Reception or scheduling staff shall take the following steps if a person identifies that she or he has a mobility disability and requires an accommodation:

- Inquire what, if any specific accommodations the person might require
- If the patient identifies a specific accommodation such as either a height adjustable examination or lifting assistance, inform the staff person in charge of arranging accommodations who will:
 - Determine if that accommodation request can be met under ADA requirements
 - Either arrange for the accommodation to be provided or if the requested accommodation cannot be provided, identify an equally effective alternative that can be provided

Accommodating People with Communication, Intellectual or Developmental Disabilities

People who have communication, intellectual or developmental disabilities may require a variety of accommodations. In addition to those discussed for people with other disabilities, these can include flexible appointment times and longer medical visits in order to ensure that sufficient time for communication and discussion with the medical professional.

In order to ensure that the practice accommodates patients who have communication, intellectual or developmental disabilities:

Reception or scheduling staff shall take the following steps if a person identifies that she or he has a disability and requires an accommodation:

- Inquire what, if any specific accommodations the person might require
- If the patient identifies a specific accommodation such as extended appointment time, inform the staff person in charge of arranging accommodations who will:
 - Determine if that accommodation request can be met under ADA requirements
 - Either arrange for the accommodation to be provided or if the requested accommodation cannot be provided, identify an equally effective alternative that can be provided

Effective Communication with People who are Deaf or Hard-of-Hearing

People who are deaf or hard-of hearing who seek or use the services of the practice might use specific communication devices or services such as a TTY telephone communication device or electronic communication methods such as email in order to make appointments or communicate with office staff. They might also require accommodations such as Qualified Sign Language interpreters who are versed in medical terminology, assistive listening devices or exchange of written notes to ensure effective communication with medical providers and staff during office visits. The type of accommodation required for effective communication will vary depending on the level of complexity of the information being exchanged, and the patient's level of English language proficiency.

In order to ensure that Pearl Periodontics P.C. provides appropriate and effective care to new patients who are deaf or hard-of-hearing:

Reception or scheduling staff shall take the following steps if a patient identifies that she or he is deaf or hard-of-hearing when scheduling the first appointment:

- Inquire what method enables effective communication with the doctor or other medical professional during the upcoming visit
- If the patient identifies a specific, preferred method of communication, inform the staff person in charge of arranging accommodations who will:
 - Determine if that accommodation request can be met and meets ADA requirements for effective communication
 - Either arrange for the accommodation to be available, or if the requested accommodation cannot be provided, work with the patient to identify an equally effective alternative that can be provided.

Standard Patient Information Materials Produced in Alternative Formats

Management will arrange to produce and make available standard patient information materials (such as a description of the practice) that are routinely provided to those making inquiries about the practice and by new patients, in formats that are accessible to people who are blind or have visual impairments including but not limited to large print, electronic and audio formats and in Braille. Management will also provide other materials in alternatives to print formats as required by individual patients in accordance with the requirements of the Americans with Disabilities Act (ADA).

Effective Communication with People Who Are Blind or Who Have a Visual Impairment

People who are blind or who have visual impairments require access to print materials in various forms that are accessible to them such as large print, electronic formats, audio recordings or Braille. Under some circumstances, qualified readers can read the information to the individual.

In order to ensure that (name of the practice) provides access to print for people who are blind or have visual impairments:

Reception or scheduling staff shall take the following steps if a person identifies that she or he is blind or has a visual impairment when scheduling the first appointment:

- Inquire what method of access to print information is most effective for the individual
- If the patient identifies a specific preferred method, such as large print or electronic or audio formats, inform the staff person in charge of arranging accommodations who will arrange for the accommodation to be available

Disability Awareness Staff Training

Management shall ensure that all staff, including new staff receive basic disability awareness and Americans with Disabilities Act (ADA) training; an orientation to the policies and procedures for accommodating patients with disabilities; and methods by which seniors and people with disabilities may file a grievance internally.

Grievance Policy

Management shall ensure that grievance procedures are available to people with disabilities and that disputes concerning the provision of accommodations, including but not limited to auxiliary aids and services, modification of policies and practices, and other physical accessibility issues, may be brought to the attention of the practice through the procedure. The practice will take reasonable steps to ensure that all patients, including patients with communication disabilities, are informed of this grievance policy.