



BHS Policies and Procedures	
 <p>City and County of San Francisco Department of Public Health San Francisco Health Network BEHAVIORAL HEALTH SERVICES</p>	<p>1380 Howard Street, 5th Floor San Francisco, CA 94103 (415) 255-3400 FAX (415) 255-3567</p>
Policy or Procedure Title: Behavioral Health Services General ADA Policy	
<p>Issued By:</p> <div style="border: 1px solid #ccc; padding: 2px; margin: 5px 0;"> <small>DocuSigned by:</small>  <small>360E8E598F1D468...</small> </div> <p>Imo Momoh Director of Managed Care, Behavioral Health Services</p> <p>Date: January 23, 2024</p>	<p>Manual Number: 3.15-01</p> <p>References: Rehabilitation Act of 1973, Section 504; Americans with Disabilities Act (ADA) of 1990</p>

Technical Revision. Replaces 3.15-01 of March 20, 2018.

Equity Statement: The San Francisco Department of Public Health, Behavioral Health Services (BHS) is committed to leading with race and prioritizing Intersectionality, including sex, gender identity, sexual orientation, age, class, nationality, language, and ability. BHS strives to move forward on the continuum of becoming an anti-racist institution through dismantling racism, building solidarity among racial groups, and working towards becoming a Trauma-Informed/Trauma Healing Organization in partnership with staff, members, communities, and our contractors. We are committed to ensuring that every policy or procedure, developed and implemented, leads with an equity and anti-racist lens. Our policies will provide the highest quality of care for our diverse members. We are dedicated to ensuring that our providers are equipped to provide services that are responsive to our members' needs and lived experiences.

Purpose: The aim of the policy is to ensure that BHS members with disabilities have equal access to behavioral health services and benefits at all BHS facilities, including sites operated by providers with whom there is an established contract with the Dept. of Public Health BHS. This entails strict compliance with all standards laid out by the Americans with Disabilities Act (ADA) of 1973 and barring of any discriminatory treatment towards those with a disability.

Scope: This policy applies to a member's entire experience, including interactions with program sites and/or staff, at BHS facilities and those operated by contracted community-based organizations.

Definitions:

Member: prospective and current clients of BHS seeking and/or utilizing services and benefits.

Policy:

1. **Inclusion** - Under the ADA, all BHS sites and those of contracted Community-Based Organization (CBO) partners are prohibited from denying services to members based strictly on them having a

disability. That entails making efforts to find a means of a reasonable accommodation - i.e., one that doesn't infringe on the ability of staff to perform their duties or other members to receive services – in the event that a member brings attention to a barrier to accessing services due to a disability they may have. Any person seeking service or benefits who is rejected for this reason has the right to report and file a complaint for the exclusionary practice they encounter, as outlined in the *Grievance Procedure in Compliance with Section 504 and the ADA*¹. Those with disabilities must have equal opportunity to participate in the programs/services offered through BHS.

2. **Communication Access** - The ADA requires that City agencies communicate to those with disabilities in a manner as effective as when communicating with the non-disabled. This equality of access means providing additional services or making accommodations for those with physical or mental impairments.

- Signage posted at the sites and critical documents should be available in large print or Braille for those with visual impairments.
- All civil service clinics and CBO sites should identify staff with American Sign Language capability, who can be called upon when trying to serve a hearing-impaired member.
- Members should be made aware of the availability of ASL interpreters, available through DPH's agreements with Bay Area Communication Access (BACA) and International Effectiveness Center (IEC), should the need arise.
- Communicating via TTY or the California Relay System (CRS) by dialing 7-1-1 for those with speech or hearing disabilities.
- Signage should inform members that access to all the above-mentioned accommodations is their right and that all of them are available, completely free of charge.

3. **Programmatic Access** - ADA mandates that agencies modify their policies and procedures to provide equal opportunity for those with a disability, such as through the following:

- Providing members with assistance to obtain and complete paperwork, using simple language to explain information for those with learning or psychiatric disabilities.
- Offering those with certain mental disabilities the option to apply for services over the phone, allowing them to avoid what can be a stressful time waiting in a busy clinic/office.
- Ample posting of member rights/responsibilities.
- Reconfiguring programming or shifting meeting locations/format to better accommodate member needs.

4. **Architectural Access** - ADA requires that service areas, including bathrooms, telephones, etc., be accessible to those with physical disabilities such as the following:

- Ramps that allow for wheelchair/walker access to a facility,

¹ Grievance Procedure in Compliance with Section 504 and the ADA (BHS Manual No. 3.04-3)

- Designated disabled seating areas in waiting rooms for quick, convenient access to service.

In the event that a site or program lacks the architectural structure or infrastructure necessary to meet the needs of a member, the program will ensure that the member is placed at a site within the BHS network that can accommodate their needs.

5. **Service/Support Animals Access** - For all BHS sites and those of CBO partners, the ADA mandates that service animals must be allowed to accompany those with disabilities in all areas of the facility where the public is normally allowed to go; City legislation extends this mandate to include emotional support animals (ESA). The handler of the service/support animal is expected to care for and supervise the animal. As such, BHS policy around the rights and responsibilities of those being accompanied by service animals and ESA shall align with the DPH *Service and Support Animals in DPH Policy*².

Contact Person: ADA Investigator, Behavioral Health Services: BHS-ADA@sfdph.org

Distribution:

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² Service and Support Animals in DPH Policy [ServiceSupportAnimalsDPHpolicy_Final.pdf \(sfdph.org\)](#)