



6.1 FACILITIES AND ACCESSIBILITY OF SERVICES

POLICY:

When viewed in their entirety, facilities are readily accessible to people with disabilities (45 CFR § 84).

Projects should identify and execute strategies for delivering services that are responsive to the needs of the clients and communities served. (PA-FPH-22-001 NOFO, FY 22 Notice of Award Special Terms and Requirements)

Recipients must improve and expand accessibility of services for all clients, especially low-income clients by providing client-centered services that are available when and where clients need them and can most effectively access them. (PA-FPH-22-001 NOFO, FY 22 Notice of Award Special Terms and Requirements)

PROCEDURE:

When selecting new service sites, geographic accessibility is considered to ensure client access to transportation, clinic location, hours of operation, and other factors that influence clients' abilities to access services.

Service sites must ensure access to services for individuals with disabilities at their sites. For information on your specific legal obligations for serving qualified individuals with disabilities, including providing program access, reasonable modifications, and taking appropriate steps to provide effective communication, see <http://www.hhs.gov/ocr/civilrights/understanding/disability/index.html>

Service sites maintain documentation of any accommodations made for individuals with disabilities.

Service sites are free from obvious structural or other barriers that would prevent individuals with disabilities from accessing services.

A Limited English Proficient (LEP) person is an individual who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English. Such a person may be eligible to receive language assistance with respect to services or benefits.

Subrecipients must have policies and procedures for language translation services, post a notice in the primary languages of their service area population of the availability of these services at no cost to the client, and include procedures for serving clients who are sight or hearing impaired.

Each service site must have written documentation that a client's need for language assistance has been assessed.

Subrecipient policies ensure language translation services are readily provided when needed and staff is aware of how to access language translation services when needed.



Although some LEP individuals may feel more comfortable when a trusted family member or friend acts as an interpreter, this is strongly discouraged. The ND FPP strongly recommends using alternate services to accommodate the interpreting needs of LEP clients. Clinics should make the LEP person aware that they can have an interpreter provided at no cost. Using Language Line Solutions (LLS) or other interpretation options helps ensure that the client receives competent, appropriate, and confidential interpretation without the possible conflict of interest and confidentiality breach that may arise when using friends or family members as interpreters.

RESOURCES:

ND FPP policy 2.3 Non-Discriminatory Services

Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons
(<https://www.hhs.gov/civil-rights/for-individuals/special-topics/limited-english-proficiency/guidance-federal-financial-assistance-recipients-title-vi/index.html>)

45 CFR § 84—Nondiscrimination On The Basis Of Handicap In Programs Or Activities Receiving Federal Financial Assistance (<https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-84>)

Summary of Guidance to Federal Financial Assistance Recipients Regarding Title VI and the Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons
<https://www.hhs.gov/civil-rights/for-providers/laws-regulations-guidance/guidance-federal-financial-assistance-title-vi/index.html>

Provider Obligations for Providers of Health Care and Social Services [Provider Obligations | HHS.gov](#)

Limited English Proficiency [Welcome to LEP.gov](#)

Discrimination on the Basis of Disability [Disability | HHS.gov](#)

Title X Program Handbook (December 2024)
<https://opa.hhs.gov/sites/default/files/2025-03/title-x-program-handbook-dec-2024.pdf>

PA-FPH-22-001 NOFO
(<https://www.grantsolutions.gov/gs/preaward/previewPublicAnnouncement.do?id=95156>)