



HURON BEHAVIORAL HEALTH  
**PROCEDURE**

Procedure #: **RR.2.46**  
Issue Date: 07/12/05  
Rev. Date: 05/02/17  
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**Title: Interpreters / Limited English Proficiency (LEP) / Assistive Technologies Procedure**

Prepared By: Executive Director

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**Purpose:**

To define the process and resources to be used when consumers require services to be provided in another language, format, or other assistive technology manner.

**Scope:**

This procedure applies to all employees (including full-time employees, part-time employees, contractual providers, volunteers, students, and/or interns, of Huron Behavioral Health (HBH) programs.

**Information:**

1. Limited English Proficiency (LEP) is the responsibility of providers of health and social services who receive federal financial payments from the US Department of Health and Human Services (HHS). This requirement states that a provider must ensure that eligible individuals with Limited English Proficiency needs have access to HBH programs and services.
2. The legal basis for LEP and accommodation are:
  - Title VI of the Civil Rights Act of 1964
  - Rehabilitation Act of 1973
  - Americans with Disabilities Act (ADA)
  - Executive Order 13166
3. All LEP services are provided at no cost to the consumer.
4. In accordance with the Health Insurance Portability and Accountability Act (HIPAA) of 1996, and to protect the privacy of consumers and the confidentiality of all communications with interpreters, HBH will maintain business associate agreements with interpreter/translation services utilized.
5. HBH staff has access to three (3) interpreter options using Voices for Health services:
  - **On-site interpreters** are available 24/7 in over 40 languages at clinical locations and home visits throughout Michigan
  - **Over-the-phone interpreters (OPI)** are available on-demand, 24/7 in over 200 languages
  - **Video remote interpreting (VRI)** is available on-demand from any mobile device in over 18 languages

**Procedure:**

**A. Crisis Situations – Language Interpreters:**

1. When a consumer is receiving Emergency Services (ES) and is in need of a language interpreter, the ES worker will contact the following resource to obtain the necessary interpreter services for the crisis intervention:

**Voices For Health (VFH) phone number: (800) 650 – 0310 (access code 830069)**

2. The worker will call the interpreter service and notify them of the language that is needed and the worker will be connected almost immediately with an available language interpreter.
3. The worker should make a reference to the interpreter service on the “ES Pre-Admission Screening Form” (in the Electronic Medical Record/EMR).
4. Additionally, the worker must log the use of LEP accommodation onto the [“LEP Special Needs Log Sheet” 90-129](#) which is maintained by the Receptionist.
5. Workers should be aware that the telephone interpreter services bill for each minute the interpreter service is connected via the telephone.

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**B. On-Going Services – Language Interpreters:**

1. When a consumer is seen for on-going services and an interpreter or translator is needed for treatment, the worker should always attempt to utilize face-to-face interpreters rather than telephone services, whenever possible. Because of the rural nature of the county and the diverse language probability, it may not always be possible to provide a face-to-face interpreter for the consumer.
2. HBH workers will coordinate with the following services to provide the necessary language assistance in advance of the consumer's scheduled appointment time:
  - **For Sign Language interpreters, call: Voices For Health Services (800) 650 – 0310** (access code 830069)
3. When face-to-face interpreter services are not available, the worker may utilize a telephone interpreter service as an alternative. Telephone interpreters do not need to be scheduled in advance of the appointment time. Workers should contact the following service at the appointment time in the order of preference, as defined below:

**For Telephone Language Interpreters, contact:**

**Voices For Health (VFH) phone number: (800) 650 – 0310 (access code 830069)**

4. The worker should make a reference to the interpreter service on the progress note form in EMR.
5. Additionally, the worker must log the use of LEP accommodation onto the [“LEP Special Needs Log Sheet” 90-129](#) which is maintained by the Receptionist.
6. Workers should be aware that the telephone interpreter services bill for each minute the interpreter service is connected via the telephone.

**C. Additional Assistive Technology Needs:**

1. Admissions/Intake Representative and/or the Primary Worker will work with any consumer who evidences a need or makes a request for other types of Assistive Technology devices or services (see also [“Limited English Proficiency \(LEP\) Policy”](#) RR.1.01, [“Limited English Proficiency \(LEP\) Accommodation Policy”](#) RR.1.02, and [“Supported Employment Policy”](#) SEP.1.01). This may include, but is not limited to:
  - Hearing impairments
  - Mobility impairments
  - Vision impairments
  - Speech impairments
  - Learning impairments
  - Sensory impairments
  - Communication impairments
  - Cognitive impairments
  - Physical Impairments
  - Translator needs
  - Reading assistance needs
2. HBH staff will work with the consumer to meet their assistive technology needs by linking them to the appropriate resource(s).
3. This will typically be documented in the consumer's Person-Centered Plan (PCP) (see also [“PCP Policy”](#) [QI.1.05](#) and [“PCP Procedure”](#) [QI.2.18](#)).
4. Whenever special assistance is provided, the worker will record this on the [“LEP Special Needs Log Form”](#) (90-129) which is maintained by the receptionist.
5. The receptionist will retain the completed logs for a minimum of seven (7) years.

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**Definitions/Acronyms:**

- ADA – Americans with Disabilities Act
- COA – Council on Accreditation
- EMR – Electronic Medical Record
- ES – Emergency Services
- HBH – Huron Behavioral Health
- HHS – Health and Human Services
- HIPAA – Health Insurance Portability and Accountability Act of 1996
- LEP – Limited English Proficiency
- MDHHS – Michigan Department of Health and Human Services
- VFH – Voices For Health

**Forms:**

- [90-026 Internal Requisition Form](#)
- [90-129 LEP Special Needs Log Form](#)
- Progress Note Form (in EMR)
- ES Preadmission Screening Form (in EMR)

**Records:**

Records of LEP activities are retained in the consumer’s case record in accordance with the [“HBH Record Retention and Storage Policy” \(QI.1.23\)](#), and logged onto the LEP Log sheet maintained and retained by the Receptionist for seven (7) years.

**Reference(s) and/or Legal Authority**

- COA standards
- MDHHS Site Review Protocols
- [QI.1.05 Person Centered Plan \(PCP\) Policy](#)
- [QI.1.23 HBH Record Retention and Storage Policy](#)
- [QI.2.18 Person Centered Plan \(PCP\) Procedure](#)
- [RR.1.01 Limited English Proficiency \(LEP\) Policy](#)
- [RR.1.02 Limited English Proficiency \(LEP\) Accommodation Policy](#)
- [SEP.1.01 Supported Employment Policy](#)

**Change History:**

Change Letter	Date of Change(s)	Changes
None		New procedure to clarify LEP practices
A	12/04/08	Reviewed and revised to comply with COA 8 <sup>th</sup> Edition Standards and present practices – removed COA chapter-specific references (G1), changed Progress Note Form numbers from 90-208 & 30-001 to 90-1008 (EMR/Gallery form number) several places in document.
B	12/08/09	In A.1 – changed “Tele-Interpreters” to “Voices For Health” and revised phone number, added “VFH” to “Acronym” section, removed “Maria Gonzalez” from B.2
C	07/23/13	Reviewed and revised to comply with 8 <sup>th</sup> edition COA standards – A.4 & B.5 removed “station/Customer Service”, C.1 changed “Customer Service” to “Admissions/Intake”, C.4 changed “Customer Service Department” to “by the receptionist”, C.5 changed “Customer Service” to “receptionist”, changed “Consumer Special Needs Log Form” to “LEP Special Needs Log Form” throughout document (3 places), “Re3ocdrds” section changed “Customer Service” to “receptionist” (2 places), “Forms” section removed reference to “Gallery” & removed “90-163 (ES Crisis Contact Form)” and replaced with “100-006” (Preadmission Screening Form).
D	02/24/15	Reviewed and revised to comply with MSHN “Customer Service – Information Accessibility/Limited English Proficiency (LEP)” policy adopted 07/02/14 – removed form numbers (90-1008 & 100-006) (3 places), removed “AAM” from “Acronym” section.
E	02/17/17	In “Acronyms” section added “MDHHS” and removed “DD” & “MI”, made several minor wording/grammatical changes/corrections throughout document without changing sentence content.
F	05/02/17	Changed phone number from “(616) 233-6505” to “(800) 650-0310” throughout procedure (3 places) & added access code (“830069”) (3 places), in “Information” section added #5.