



HURON BEHAVIORAL HEALTH
PROCEDURE

Procedure #: **RR.2.46**
Issue Date: **07/12/05**
Rev. Date: **11/08/22**
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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 and part-time employees), contract providers (residential, clinical, and vocational), volunteers, students, and/or interns, of Huron Behavioral Health (HBH) programs.

Information:

1. Providing Limited English Proficiency (LEP) assistance is the responsibility of health and social services providers who receive federal financial payments from the US Department of Health and Human Services (HHS). HHS requires that providers must ensure that eligible individuals who have Limited English Proficiency needs are given access to services and programs.
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 all interpreter/translation services utilized.
5. HBH staff has access to three (3) interpreter options using Voices for Health services:
 - **On-site interpreters plus "TELEHEALTH" (audio/video conference calls)** are available 24/7 in more than forty (40) languages at clinical locations and home visits throughout Michigan
 - **Over-the-phone interpreters (OPI)** are available on-demand, 24/7 in more than two-hundred-forty (240) languages
 - **Video remote interpreting (VRI)** is available on-demand from any mobile device in forty (40) 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 note the use of interpreter service on the "ES Pre-Admission Screening Form" in the Electronic Medical Record (EMR) system.

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- Workers should be aware that the telephone interpreter services bill for each minute the interpreter service is connected via the telephone.

B. On-Going Services – Language Interpreters:

- When a consumer is seen for on-going services and an interpreter or translator is needed for treatment, the worker should preferably 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.
- 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)
- When face-to-face interpreter services are not available, the worker may utilize telehealth or 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)

- The worker should note the use of interpreter service on the progress note form in the EMR system.
- 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:

- 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 and "[Limited English Proficiency \(LEP\) Accommodation Policy](#)" (RR.1.02). 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
- HBH staff will work with the consumer to meet their assistive technology needs by linking them to the appropriate resource(s).
- This will typically be documented in the consumer's Individual Plan of Service (IPOS). (See also "[Person-Centered Planning Policy](#)" QI.1.05 and "[Individual Plan of Service \(IPOS\) Procedure](#)" QI.2.18.)

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
IPOS – Individual Plan of Service

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LEP – Limited English Proficiency
 MDHHS – Michigan Department of Health and Human Services
 OPI – Over-the-Phone Interpreters
 VFH – Voices For Health
 VRI – Video Remote Interpreting

Forms:

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” \(QI.1.23\)](#).

Reference(s) and/or Legal Authority

COA standards
 MDHHS Site Review Protocols
[QI.1.05 Person Centered Planning Policy](#)
[QI.1.23 HBH Record Retention and Storage Policy](#)
[QI.2.18 Individual Plan of Service \(IPOS\) Procedure](#)
[RR.1.01 Limited English Proficiency \(LEP\) Policy](#)
[RR.1.02 Limited English Proficiency \(LEP\) Accommodation Policy](#)

Change History:

Change Letter	Date of Change(s)	Changes
None	07/12/05	New procedure to clarify LEP practices
A	12/04/08	Reviewed and revised to comply with COA 8 th 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 th 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), “Re3ocrds” 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.
G	03/06/19	In “Scope” section added “(residential, clinical, and vocational)”, in “Acronyms” section added OPI & VRI, corrected all hyperlinks.
H	01/06/21	Made numerous minor wording/grammatical changes/corrections throughout procedure without changing sentence content.
I	11/08/22	Removed reference to use of the “LEP Special Needs Log Form” (90-129) throughout procedure (4 places), in “Forms” section removed 90-026 & 90-129, in “Information” section #5 added “plus TELEHEALTH” (audio/video conference calls) and updated language stats from website, made several minor wording/grammatical changes/corrections throughout procedure without changing sentence content.