



## HURON BEHAVIORAL HEALTH PROCEDURE

Procedure #: **RR.2.46**  
Issue Date: 07/12/05  
Rev. Date: 06/11/23  
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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. Interpreter/Translation Services:

1. When a consumer is seen for on-going services and an interpreter or translator is needed for treatment, the worker should contact the contracted interpreter/translation service and utilize audio/video or over-the-phone interpreting services. 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:
2. HBH workers will coordinate with the following services to provide the necessary language assistance at the time of the consumer's scheduled appointment time.

**Voices For Health (VFH) phone number: (800) 903 – 4090**

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*(Note: a back-up phone number is also available if the worker cannot connect via the primary numbers @ (866) 386 – 1284)*

3. The worker will be asked to enter the HBH Account #: **Account Number 12207**
4. The worker will be asked to select the target language (Note: If the worker is unsure of the language needed, refer to the "I Speak" cards at the reception desk. Select from the alphabetical listing of more than 240 languages.
5. The worker will be asked to provide the caller's first and last name and also the LEP consumer's first and last name.
6. Workers should be aware that the telephone interpreter services bill for each minute the interpreter service is connected via the telephone, and be prepared before placing the call.
7. The worker should note the use of interpreter service on the progress note form in the EMR system.
8. For Emergency Services contacts, the ES worker should follow the same steps as defined above (#1 - #7)

## 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"](#) 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
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 Individual Plan of Service (IPOS). (See also ["Person-Centered Planning Policy" QI.1.05](#) and ["Individual Plan of Service \(IPOS\) Procedure" QI.2.18.](#))
4. Signatures shall be obtained from the consumer whenever required on specific forms/documents. "Signature" means an individual's written or printed name, electronic signature, or "mark" (per MCL 55.267[b]). In a situation where the consumer is blind or disabled and cannot sign his/her name, HBH staff will accommodate the consumer in whatever his/her preferred approach is to signing the document. If a consumer has chosen a "mark" as their signature, the mark will be honored and accepted. When a consumer signs with a mark, an HBH staff must witness the signing of the mark and note in the record that they witnessed this.

## 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  
LEP – Limited English Proficiency  
MDHHS – Michigan Department of Health and Human Services  
OPI – Over-the-Phone Interpreters

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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 <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), "Re3ocdrs" 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.
J	06/11/23	Updated "Voices" phone number & account #, combined sections A & B, made numerous minor wording/grammatical changes/corrections throughout procedure without changing sentence content (see Controlled Documentation Manager for previous versions or list of changes).