

CAROLINA FAMILY HEALTH CENTERS, INC.

PROCEDURE

TITLE: EXEC-306.01 Limited English Proficiency

EFFECTIVE DATE: August 6, 2018

SECTION: Executive

REFERENCE Policy: EXEC-306 Nondiscrimination Position Statement

RESPONSIBLE CHIEF OF STAFF: Chief Executive Officer

RESPONSIBLE COMMITTEE: Central-Executive

REVIEWED: 04/03/2023, 02/03/2025

I. PURPOSE

The purpose of this document is to outline Carolina Family Health Centers, Inc.'s (CFHC, Inc.) procedure to provide meaningful communication to individuals with limited English proficiency (LEP).

II. PROCEDURE

CFHC, Inc. has taken reasonable steps to ensure that individuals with limited English proficiency have meaningful access and an equal opportunity to participate in services, activities, programs, and other benefits. An individual with LEP is a person whose primary language for communication is not English and who has a limited ability to read, write, speak, or understand English. These individuals are eligible to receive language assistance services with respect to the particular service, benefit, or encounter; this also includes individuals who are not the recipient of the service, benefit, or encounter but are a companion of an individual receiving services and is an appropriate person with whom CFHC, Inc. should communicate.

In order to understand the language and communication needs of the entire population, CFHC, Inc. analyzes the number of people living in the service area with LEP. Information for this assessment is made through data obtained from the U.S. Census Bureau as well as state and local demographic data. CFHC, Inc. also reviews the communication preference of its existing patients. This information is documented in the needs assessment (refer to *EXEC-300 Needs Assessment*).

Identifying Individuals with LEP

In order to promptly identify the language and communication needs of the LEP patient, staff records the patient's race, ethnicity, language, communication needs, and preferred method of communication upon registration as outlined in additional CFHC, Inc. policies and procedures. If necessary, staff uses a language identification card to determine the language of communication. The practice of recording this information provides CFHC, Inc. with information to predictably and efficiently identify patients with LEP for several reasons:

- Based on the patient's preferred method of communication, patient records are flagged with "Needs Interpreter" to notify staff of the service needed for a particular patient.

- Based on the patient's preferred method of communication, materials generated in the electronic health record system are translated to the documented language.
- Based on the collective patient information regarding race, ethnicity, language, communication needs, and preferred method of communication, recruitment efforts are tailored to provide a culturally diverse staff in accordance with the population served.

Obtaining Oral Language Assistance Services

CFHC, Inc. provides accurate and timely language assistance services free of charge to LEP individuals. The service protects the privacy and independence of the individual. Oral language assistance is provided through bilingual staff as well as on-demand high-quality video and telephone interpreting services.

Bilingual Staff

CFHC, Inc. hires qualified bilingual employees, who have demonstrated their ability to provide in-language oral assistance as part of the employee's current, assigned job responsibilities and who have demonstrated that they are proficient in speaking and understanding spoken English and at least one other spoken language (refer to *HR-301 Bilingual Hiring*).

Bilingual staff can be identified by CFHC, Inc. employees by reviewing the employee directory found on the "CFHC Intranet." The bilingual staff's language spoken, along with contact information, is available on this resource.

CFHC, Inc. staff who identify individuals that require in-language oral assistance contact the appropriate bilingual employee who is available to communicate with the individual in their primary language. If a bilingual employee is not available, CFHC, Inc. staff take immediate and reasonable steps to obtain an interpreter through the high-quality video and telephone interpreting services as outlined below.

On-demand High-quality Video and Telephone Interpreting Services

CFHC, Inc. provides access to on-demand high-quality video and telephone interpreting services through a third-party organization. These interpretation services are available in real-time for employees to assist individuals and are provided in hundreds of languages.

CFHC, Inc. staff who identify individuals that require in-language oral assistance, and a bilingual employee is not available to communicate with the individual, staff connects to the video (preferred) or telephone (if video is unavailable) interpreting services.

Companion Interpreters

Companions, such as family members (including minors), friends, advocates, case managers and other people who are at the facility to support the patient (who are not Medical Interpreters and are not CFHC, Inc. employees) are not considered appropriate or qualified interpreters. Patients may request to use a companion as an interpreter; companions may only be used if specifically requested by the patient and only after CFHC, Inc. staff has communicated to the patient, in his/her primary language, that CFHC, Inc. is willing to provide a qualified interpreter to the patient free of charge.

However, to ensure accurate interpretation and mitigate risk to CFHC, Inc. and its staff, CFHC, Inc. employees have the right to use CFHC, Inc. approved interpreters or video interpreting service in the presence of the patient's companion.

Only in an emergency involving an imminent threat to the safety or welfare of an individual or the public where there is no qualified interpreter for the individual with LEP can non-qualified interpreters be used to provide support to the patient.

Providing Written Translations

CFHC, Inc. uses a qualified translation service when translating written content in paper or electronic form. This service provides qualified translators who have demonstrated proficiency in writing and understanding both written English and at least one other written non-English language, are able to translate effectively, accurately, and impartially to and from such language(s) and English, using any necessary specialized vocabulary or terms without changes, omissions, or additions and while preserving the tone, sentiment, and emotional level of the original written statement.

Written materials provided to patients on direction, guidance, education, and information are created in languages spoken by at least 5% of the patient population. Materials created internally are reviewed and approved through CFHC, Inc.'s Continuous Quality Improvement program. All documents needing translation are sent to the Director of Communications, and he/she prepares the documents to be sent to a third party for translation.

CFHC, Inc. provides translation of other written materials, if needed, for individuals with LEP free of charge.

A listing of documents that are available, the languages they are translated into, the date of issuance, and how to access electronic translations are available on the "CFHC, Inc. Intranet."

If CFHC, Inc. does not have a translated document available, staff will submit the document(s) to the Director of Communications for translation into the appropriate language.

If any staff members encounter difficulty with obtaining oral interpretation or written translation for an individual with LEP, they are directed to work with their supervisor initially. If rapid resolution is not identified, they are directed to contact the Chief Compliance Officer which serves as the Section 1557 Coordinator for the organization. The Chief Compliance Officer's contact information can be found by searching the employee directory found on the "CFHC Intranet."