



## Cultural Diversity and Limited English Proficiency (LEP)



**Policy A-HR-18**

**January 8, 2008**  
**Revised October 14, 2013**  
**Revised June 13, 2019**

**Purpose:** Cultural & Language barriers inhibit and prevent individuals from accessing and/or understanding important rights, obligations, services, and/or from communicating accurately and effectively in achieving necessary healthcare or in retaining non-healthcare related services.

**Policy:** To ensure compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency,” TRDHD will establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964, for all staff to follow when providing services to, or interacting with culturally diverse individuals & those with Limited English Proficiency.

1. Recognizing the importance of effective and accurate communication between Three Rivers District Health Department (TRDHD) Staff and the populations it serves, the agency will establish guidelines for identification of clients who encounter barriers to services due to cultural factors or LEP.
2. TRDHD will provide LEP individuals will meaningful language access in all programs and materials.
3. TRDHD will provide training to employees on clients needing Interpretive services or for overcoming stigma and cultural barriers that prevent culturally diverse clients and others from accessing health department services.
4. TRDHD’s Health Equity Team along with the Policy/Planning Manager will conduct and review the Cultural and Linguistic Competency Assessment (CLCPA) annually. A Plan for addressing inequities or other barriers that might be preventing access to services will be implemented.
5. All clients are asked to complete a client satisfaction survey regarding their experience with TRDHD to determine whether or not staff are treating clients with respect and dignity

### **Procedure:**

1. **Guidelines for Identification of Non-English Languages:**
  - TRDHD staff utilize Interpretive Language charts such as “Point to your Language” or “I SPEAK” to determine language for non-English Speaking clients. Interpreters are provided free of charge and appropriate to the language needed either through an employee or through an Interpretive Phone Service.

2. **Guidelines for Use of Interpretative Services:**

- **Spanish Speaking Clients:** TRDHD has a part-time employee who is available for Spanish speaking clients. If she isn't in the office, this employee is usually available by phone. If the interpreter is in the building, the clerk notifies her of the need for her services and she stays with the client through their visit as needed. If she is at another health center, she can be reached by cell phone. Non-English-speaking clients are given a choice of using the TRDHD interpreter or Telephonic Language Interpretive Services.
- **Other INTERPRETATIVE SERVICES:** When a TRDHD employee is unavailable to provide interpretive services in person, the phone service "Cyracom" is used for live language interpretation service. The TRDHD Health Centers utilize special telephone handsets with two receivers when available. Employees use these to have a one-on-one conversation with a human performing the translation over the phone. With this special telephone each participant gets their own handset, but the service can also be utilized with a regular landline phone or cell phone by handing the phone back and forth between the client and the TRDHD staff member.

The procedure is simply to dial the phone number, enter the account & Pin Number when prompted. Again, this can be performed with one of the blue language line phones or with a regular land line or cell phone.

Dialing 1-800-481-3293  
 Enter in account number: 501017710  
 Enter in PIN: 9404  
 And then following the prompts.

The service is pay per minute, fee based on language, and there's a minimal **monthly** charge of \$100 to TRDHD.

The service can also call the clients phone number and perform the translation – in this way the client does not even need to be in the same room with the employee.

3. **Staff Training** & Development

- **Employees will receive training during new hire/orientation and annually on Cultural Diversity, Civil Rights, & LEP and instructions on the provision of language assistance services to LEP patients/clients.**

4. **Assessment & Plan for Cultural & Linguistic Competence:** The Chairperson of the Equity Team shall serve as Civil Rights/Cultural Competence Officer (CR/CCO) and along with the Equity Team will:

- Ensure LEP and Cultural Competence compliance measures are met through ongoing assessments and trainings.
- Examine services provided, identify need(s) for those with Cultural and LEP, and develop and implement a plan to provide services to those individuals.

- Maintain a Limited English Proficiency (LEP) & Cultural Diversity Plan.
5. **The Limited English Proficiency & Cultural Diversity Plan(s)** addresses the following areas:
- **Assessment of the Population:** Assess the needs, every four (4) years, of the populations in the counties served by TRDHD to determine the needs for language assistance for those persons whose primary language is not English. Additionally, this plan will attempt to identify culturally diverse populations living within the TRDHD district and the particular needs or barriers identified with each population.
  - **Policies and Procedures:** Identify LEP persons; assure language assistance measures by contracting with Interpreters and installing telephone language-line assistance services. Provide translation of vital documents; such as, consents, and notices pertaining to reduction, denial or termination of services or benefits. Provide translation of required notices, and important information into the most frequently encountered language and post in client/patient waiting areas. Make clients aware of free Interpretation/Translation services. Provide training especially for front line providers for this policy & for identification and appropriate assistance for culturally diverse populations in order to improve their health outcomes.
  - **Complaint Procedures:** Three Rivers maintains a Grievance Committee for complaints with standardized complaint and investigation procedures and documents available to employees/patients/clients/individuals.
  - **Plan Monitoring and Evaluation:** Civil Rights/Cultural Competence Officer or designee conduct ongoing assessments of service area populations and a Satisfaction Survey is conducted at least annually and any time a client is identified to be ESL or other culturally diverse populations.

---

**District Director**

**Date**

---

**Chairperson, Three Rivers District Board of Health**

**Date**