

**Policy Title: Inclusive Communications Policy**

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| <b>Policy Owner:</b> COO<br><b>Policy Originated by:</b> IT & Compliance & ADT   | <b>Date Written:</b> 8/17/15  |
| <b>Applicable Programs:</b> All  | <b>Date Reviewed and Approved by PLT:</b><br>08/26/15, 10/24/17, 7/22/20, 1/27/21 |
| <b>Statutory or Regulatory Citation:</b><br>DHS Office of Civil Rights, Medicare | <b>Signature if needed:</b>   |

**Policy:** St. David's Center will take reasonable steps to ensure meaningful access and an equal opportunity to participate in our services, activities, programs and other benefits. It is the policy of St. David's Center to ensure meaningful communication with clients and their authorized representatives involving their services and treatment. This policy also provides for communication of information contained in vital documents, including but not limited to, waivers of rights, consent to treatment forms, financial and insurance benefit forms, etc. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served, and patients/clients and their families will be informed of the availability of such assistance free of charge.

Language assistance will be provided through use of competent bilingual staff, formal arrangements with local organizations providing interpretation or translation services, or technology and telephonic interpreter services. All staff will be provided notice of this policy and procedure.

St. David's Center will conduct a regular review of the language access needs of our patient population, as well as update and monitor the implementation of this policy and procedures as necessary.

This policy includes the following:

1. Interpreter Guidelines
  - A. Process for identification of individuals in need of assistance
  - B. Methods to inform persons that services are available
2. Individuals with limited English proficiency (LEP)
3. Individuals who are deaf or hard of hearing
4. Individuals who are blind or have low vision
5. Individuals who have other impaired sensory, manual or speaking skills

**Procedure:**

1. **Interpreter Guidelines:**

- A. St. David's center is responsible for arranging the interpreter service and paying the interpreter. If a recipient comes to an appointment with an interpreter, St. David's Center is not required to use that interpreter.
- B. For sign language interpreter services, the interpreter may be on a video screen when using video remote interpreter services.
- C. For spoken language interpreter services, the interpreter may communicate by phone or teleconference.
- D. St. David's Center staff who are bilingual may interpret for the client, but this will not be billed as an interpreter session in conjunction with another service.
  - i. Example: If the provider delivers a clinical service while communicating in the recipient's language, it is not interpreting and not separately billable as an interpreter service
- E. Minor children will never be used as interpreters.
- F. Clients may request to use a family member or friend as an interpreter. However, family members or friends will not be used as interpreter unless specifically requested by that individual and AFTER the client has understood that an offer of an interpreter at no charge is available. If a client chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, competent interpreter services will be provided.
  - i. If a client chooses to use a family/friend (declining the offer of an interpreter), this will be documented in the client's medical record.
- G. St. David's Center partners with a select group of interpreter agencies. All agencies have a signed business associate agreement on file, in addition to meeting quality standards, which include:
  - i. Use the appropriate mode of interpreting given the situation (e.g., consecutive, simultaneous, summarization, or sight translation).
  - ii. Have received appropriate "interpreter" training that includes instruction in the skills and ethics of interpreting, and rules of confidentiality and data privacy.
  - iii. Understand their role as interpreters without deviating into other roles, such as counselor or legal advisor.
  - iv. Are culturally sensitive.

- H. St. David's Center staff will inform individuals that an interpreter is available to them at no cost. All St. David's Center staff will be provided this policy and procedure. It is the responsibility of all staff at St. David's to ensure that at the first moment of engagement with our agency, clients/parents/guardians are informed that an interpreter is available to them at no cost. St. David's Center CORE Office of Intake & Enrollment is the traditional starting place for clients/families, however, there may be times a client/family begins their process uniquely, therefore all staff must be aware and follow this policy/procedure. If during the initial call with a client/family, the staff member determines an interpreter is necessary, they will make the necessary steps to obtain an interpreter on the call or schedule a future call with an interpreter to ensure the family is aware that this service is available and that their needs are met.
  
- I. Identifying Individuals with Limited English Proficiency (LEP), or those who need sign language interpreters. St. David's Center staff will work to promptly identify the communication needs and language needs. St. David's Center Electronic Medical Records will include notes regarding the language or assistive services used to communicate with the client/parent/guardian for any formal clients or referrals.
  - i. An interpreter should be called:
    - a. When a client/parent/guardian requests an interpreter.
    - b. When a staff member cannot understand the information being conveyed by the client.
    - c. When the client/parent/guardian is assessed as needing an interpreter by staff because of difficulty in communicating in English.
    - d. When a staff member cannot understand the information being conveyed by the parent/guardian and their input is necessary for the services of the client.
    - e. When a client prefers to speak and is more fluent in a language other than English.
    - f. When a client/parent/guardian communicates in sign language or indicates that they cannot communicate verbally.

## **2. Individuals with Limited English Proficiency:**

### **A. Obtaining a qualified interpreter:**

- i. St. David's Center partners with select agencies offering interpreting services. As stated previously in this policy, all agencies have a current business associate agreement on file.
  
- ii. Directions for how to access a qualified interpreter are available to all staff on the shared drive in the following folder:

- a. [Agency Interpreter Directions](#) (St. David's Center Home/Collaborative Sites/Core/Agency Interpreter Directions)
- b. Staff can obtain an interpreter immediately through a phone center (for phone calls), schedule an appointment time with a specific interpreter for a phone call to a client/family, or schedule an in-person interpreter.
- c. Current Interpreter Agencies St. David's Center partners with include:
  1. Betmar Interpreting: 877-770-5559
  2. GBR Interpreting 763-241-0002
  3. Intelligere 952-920-6160

**B. Obtaining Translated Documents.** When translation of vital documents is needed, the department will resubmit documents for translation to the Director of Administration & Health Information Management (AHIM). The AHIM Director will review the request and provide approved translated materials free of charge for the LEP individual. If it is determined that translation of documents is not feasible, an interpreter will be provided to verbally review the documents with the LEP individual. St. David's Center will continue to set benchmarks for interpreting its top requested languages into critical intake documents.

The following documents are currently available in Spanish & Somali:

- i. Authorization to Disclose Health & Developmental Information
- ii. Consent for Treatment
- iii. Authorization to Exchange Information with your Primary Care Physician
- iv. Permission Authorization
- v. Consent for Liability of Payment
- vi. Universal Intake Form
- vii. Notice of Privacy Practices
- viii. Statement of Custodianship
- ix. Policy on Interpreter Services
- x. Non-Discrimination Policy
- xi. Client Grievance Policy

### **3. Individuals who are deaf or hard of hearing:**

#### **A. Providing Interpreters and Auxiliary Services**

- i. In the event that an in-person interpreter is needed for individuals who are deaf or hard of hearing, St. David's Center will contact the following agencies:
  - a. Current Interpreter Agencies St. David's Center partners that offer American Sign Language interpreting include:

1. GBR Interpreting 763-241-0002
2. Intelligere 952-920-6160

- ii. Communication by telephone with persons who are Deaf or Hard of Hearing:
  - a. St. David's Center utilizes a relay service for external telephone numbers with TTY users.
    1. The Minnesota Relay Number for TTY, Voice, ASCII, Hearing Carry Over is 1-800-627-3529
  - b. A specially trained communications assistant (CA) facilitates the telephone conversation between a person with a hearing or speech disability and other individuals. Calls can be made to anywhere in the world (standard charges apply for long-distance calls), 24 hours a day, 365 days a year. All calls are completely confidential.
  - c. To contact a person who uses a single-line CapTel™, dial 1-877-243-2823 and then enter the telephone number of the CapTel user.
- iii. Additional Auxiliary Services. St. David's Center staff will work with the client/parent/guardian to determine if additional auxiliary services would be beneficial or appropriate. We request a one week notice to prepare any auxiliary services prior to the appointment. Auxiliary services include:
  - a. Note Takers
  - b. Computer-Aided Transcription services
  - c. Telephone handset amplifiers
  - d. Written copies of oral announcements
  - e. Assistive Listening Devices
  - f. Open and closed captioning
  - g. Videotext displays

#### **4. Individuals who are blind or have low vision:**

- A. St. David's Center staff will communicate information contained in written materials concerning treatment, benefits, services, waivers of rights, and consent to treatment forms by reading out loud and explain these forms to persons who are blind or who have low vision.
- B. Additional Auxiliary Services available to individuals who are blind or have low vision. St. David's Center CORE Navigators are available to assist with these services at 952-548-8705. We request a one week notice to prepare any auxiliary services prior to the appointment. Auxiliary Services include:

- i. Qualified Readers
- ii. Reformatting into large print
- iii. Taping or recording or print materials not available in alternate format
- iv. In addition, CORE Navigator staff are available to assist persons who are blind or have low vision in filling out forms and in otherwise providing information in a written format.

**5. Individuals who have other impaired sensory, manual or speaking skills:**

A. To ensure effective communication with persons with speech impairments or other sensory or manual impairments, St. David's Center staff will contact the Director of Administration and Health Information Management (AHIM), who is responsible to provide the aids and services in a timely manner. We request a minimum of one week to prepare available aids prior to the appointment.

B. Available aids include:

- i. Writing materials
- ii. Laptop computers/iPads for temporary check-out onsite
- iii. Flashcards
- iv. Alphabet boards
- v. Communication boards
- vi. Note takers
- vii. Computer-aided transcriptions services
- viii. Speaker phones

**Violation of this Policy or Procedure**

No or only partial adherence to this policy or procedure may result in noncompliance with current regulatory requirements and subsequent penalties to St. David's Center. Remediation for violators will include, but not be limited to, disciplinary action up to and including termination depending on the circumstances of the situation at the time.

**Reference or Attachment:**

[Agency Interpreter Directions](#)