

66NORTHCARE NETWORK

POLICY TITLE: Limited English Proficiency	CATEGORY: Customer Services/Recipient Rights	
EFFECTIVE DATE: 12/4/13	BOARD APPROVAL DATE: 12/4/13	
REVIEWED DATE: 8/26/24	REVISION(S) TO POLICY STATEMENT: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	OTHER REVISION(S): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
RESPONSIBLE PARTY: Customer Services Specialist	CEO APPROVALDATE: 9/3/24 Megan Rooney, CEO	

APPLIES TO

NorthCare Network Personnel
Network Providers

POLICY

It is the policy of NorthCare Network that all providers are to ensure enrollees with Limited English Proficiency are provided reasonable accommodations to access information and services.

PURPOSE

To assure timely access and accommodation to enrollees with Limited English Proficiency.

DEFINITIONS

1. ***Discrimination:*** Illegal treatment either intentional or unintentional of a person or group based on race, color, national origin, language spoken, sexual orientation, gender identity, religion, certain age limitations, sex, marital status, physical or mental handicap or inability to pay for services. This includes the failure to remedy the effects of past discrimination.
2. ***Limited English Proficient (LEP):*** means potential enrollees and enrollees who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English may be LEP and may be eligible to receive language assistance for a particular type of service, benefit, or encounter.
3. ***Qualified Translator/Interpreter:*** A person who has been evaluated and certified by a recognized body to provide an accurate interpretation from English to the oral or written language of the recipient. The interpreter must be familiar with the terminology to be used and be committed to confidentiality.
4. ***Telephone Interpretation Service:*** Interpreters who provide interpretation services over the telephone.
5. ***Video Interpretation Services:*** Interpreters who provide interpretation services over video.

6. **Vital Documents:** Consent forms, NorthCare Network Customer Handbook, person centered plans, grievance and appeals process, anything requiring a response from a recipient of services.

REFERENCES

- 42 CFR (Balanced Budget Act of 1997)
- Medicaid Provider Manual
- MDHHS/PIHP Contract: As amended.
<https://www.michigan.gov/mdhhs/keep-mi-healthy/mentalhealth/mentalhealth/cmhsp>
- NorthCare Network Customer Services Policy
- NorthCare Network Accessibility & Accommodation Policy

HISTORY

REVISION DATE: 1/15/18, 5/21/19, 3/24/20, 10/20/21, 8/16/22, 5/16/23, 8/26/24

REVIEW DATE: 11/27/13, 10/1/14, 7/22/15, 5/4/16, 3/23/17, 1/15/18, 5/21/19, 3/24/20, 1/28/21, 10/20/21, 8/16/22, 5/16/23, 8/26/24

CEO APPROVAL DATE: 11/27/13, 10/1/14, 8/3/15, 5/16/16, 5/2/17, 2/12/18, 6/4/19, 4/6/20, 2/2/21, 11/2/21, 9/6/22, 6/5/23, 9/3/24

BOARD APPROVAL DATE: 12/4/13

PROCEDURES

- A. NorthCare Network and all providers will ensure that all vital documents are available in any format necessary for populations that comprise more than 1% of the general population in the region. (Currently, that does not require any documents to be translated.)
- B. NorthCare Network and affiliates will ensure that the multi-language taglines are provided to enrollees in the following ways: at the initial time of intake and annually thereafter, any time an enrollee requests a copy of the NorthCare Customer Handbook, which can be located on NorthCare's website: www.northcarenetwork.org and is included with significant publications.
- C. NorthCare Network and affiliates will have all vital documents translated into languages that are requested by enrollees. The priority documents that have been established by NorthCare Network Customer Services are:
1. Release of Information Forms
 2. NorthCare Network Customer Handbook
 3. Medication Instructions
 4. Person Center Planning materials, including any Adverse Benefit Determinations
- D. NorthCare Network and affiliates will ensure that accommodation is provided to assist with understanding materials for enrollees with special needs such as cognitive or physical impairments. Customer Services will provide enrollees or their families' information on how to request an accommodation.

- E. Annual Limited English Proficiency training will occur at NorthCare Network and all affiliates for all staff.
- F. NorthCare Network will have audio-versions of the NorthCare Network Customer Handbook available on the NorthCare Website: www.northcarenetwork.org
- G. NorthCare Network and all affiliates will have procedures in place to provide translation and interpretation services to any enrollee seeking services who requests such. These procedures will at a minimum include the following:
 - 1. Maintained list of internal staff that may be available to interpret and the certification they have to do so.
 - 2. Telephone and video interpretation services for individuals for emergency and intake processes (via Language Line Services.)
 - 3. An identified agency to provide qualified translation services for enrollees during services.
 - 4. It is the policy of NorthCare Network that staff will communicate with recipients that the use of a family member and/or friend as a language interpreter is not recommended.
 - 5. If an enrollee chooses to utilize a family member and/or friend as a language interpreter, staff will document the choice.
- H. Translation and interpretation services will be provided at no cost to the enrollee.
- I. Monitoring of affiliates for adherence to these standards will occur during the Annual NorthCare Network Site Reviews.