STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH

Policy Name:	Policy and Procedures for Communicating with Persons of Limited English Proficiency	**Number:**	HE 01-002
Procedure:	See Page 2		
Applies to:	All DPH employees, program contractors		
Contact:	Director, Office of Health Equity		
Effective Date:	October 1, 2016	**Last Reviewed:**	September 15, 2016
Approved		**Date** 10/03/16	

DEFINITIONS:

A. Individuals with Limited-English-Proficiency (LEP) - Persons whose primary language is not English and who cannot speak, read, write, or understand the English language at a level that permits them to interact effectively with, and fully and fairly benefit from DPH programs, activities and services.

B. Meaningful Access to programs and services is the standard of access to comply with Title VI of the Civil Rights Act of 1964, as amended, requirements. To ensure meaningful access for Limited-English-proficient individuals, service providers must make available to clients free language assistance, which results in accurate and effective communication. Awareness of services provided and rights of service recipients are important parts of "meaningful access."

C. Clients – Members of the public who seek, participate in, or benefit from Connecticut Department of Public Health services.

D. Vital documents –Agency documents that include important information regarding agency services and benefits, and/or client rights. Vital documents typically include, but are not limited to: consent and complaint forms; legal notices; written notices of eligibility criteria, rights, denial, loss, or decreases in benefits or services; and notices advising LEP persons of the availability of free language assistance. Each DPH program may determine whether or not a document is "vital" to its operation and provision of services.

E. I Speak Cards – A simple and universal tool designed to help those with limited English proficiency identify and point to the language he/she understands.

SCOPE:

This policy applies to all staff, programs, program contractors, and operations of DPH. It will be reviewed and updated as appropriate to be consistent with the agency mission and strategic planning efforts.

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Affirmative Action/Equal Opportunity Employer

POLICY:

The Connecticut Department of Public Health (DPH) will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in and benefit from our services, activities, and programs. The policy of DPH is to ensure meaningful communication with LEP clients and their authorized representatives regarding their participation in agency services and access to relevant health information. This policy includes the communication of information contained in vital documents, including but not limited to, waivers of rights, consent to participate forms, health privacy statements, etc. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served, and clients and their families will be informed of the availability of such assistance free of charge (in the most commonly used languages by that program).

Language assistance will be provided through use of competently-trained and approved bilingual staff, and/or through contractual agreements with state-approved translation (written) and/or interpretation (spoken) vendors, which includes telephonic interpretation services and other relevant technologies. All staff will be provided notice of this policy and procedure, and staff that may have direct contact with LEP individuals will be trained in effective communication techniques, including the effective use of an interpreter.

This policy supports DPH compliance with state and federal civil rights laws and statutes, and non-discrimination requirements specified in the *Non-Discrimination in the Provision of the Department of Public Health Programs and Services Policy*, administered through the DPH Equal Employment Opportunity Office, at 410 Capitol Avenue, Hartford, CT, 06134.

PROCEDURES:

1. IDENTIFYING LEP PERSONS AND THEIR LANGUAGE

DPH will promptly identify the language and communication needs of the LEP person. If necessary, staff will use a language identification card (or "I-SPEAK cards," available online at www.lep.gov) or posters to determine the applicable language. In addition, when records are kept of interactions with clients or family members, the language used to communicate with the LEP person will be included as part of the record. Reviews of most commonly-used languages of each program will be conducted to ensure meaningful access to services.

2. OBTAINING A QUALIFIED INTERPRETER

(a) DPH offices with bilingual staff providing direct public service – DPH offices and programs that routinely respond to public inquiries (e.g., Vital Records Office, Infectious Diseases Program) often rely on competently-trained and approved bilingual staff to respond to LEP clients. These offices and programs should maintain an accurate and current list showing the

name, language, phone number and hours of availability of bilingual staff for in-person or over the phone interpretation.

(b) State-approved vendor services – In many cases, competently-trained and approved bilingual staff are not available to communicate with LEP clients. In these situations, DPH has mechanisms in place at both the agency and program level for in-person or over the phone interpretation via contracted service(s).

> ***i.*** Agency-wide, only state-approved vendors may be used for interpreter services. See Appendix I for a list of vendors and their contact information.
>
> ***ii.*** Individual programs may set up separate arrangements with a state-approved vendor for in-person or telephonic interpretation. Individual program staff should know their particular program's arrangements, and if applicable, the telephone number and the hours of availability for such contracted service(s).

Some LEP persons may request to use a family member or friend as an interpreter. However, family members or friends of the LEP person <u>will not be used</u> as interpreters unless specifically requested by that individual <u>and only after</u> the LEP person has understood that an offer of an interpreter at no charge to the person has been made. Such an offer and the response will be documented. If the LEP person 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 to the LEP person, at no cost to them, by the relevant DPH program.

Children under age 18, and other clients or untrained staff <u>will not be used</u> for in-person or telephonic interpretation, in order to ensure confidentiality of information and accurate communication.

3. PROVIDING WRITTEN TRANSLATIONS

(a) Each DPH program (or section) will be responsible for funding translation of documents into languages that are frequently encountered by the program. State-approved vendors for translation and interpretation are listed in Appendix I.

(b) DPH programs will provide translation of other written materials, if needed, as well as written notice of the availability of translation, free of charge, for LEP individuals.

4. PROVIDING NOTICE TO LEP PERSONS

DPH will inform LEP persons of the availability of language assistance, free of charge, by providing written notice in languages LEP persons will understand. At a minimum, notices and signs will be posted and provided in intake areas and other points of entry, including but not

limited to, public areas of DPH at 410 Capitol Avenue Hartford, CT location. Notification will also be provided through one or more of the following: outreach documents, telephone voice mail menus, state legislative commissions, and/or community-based organizations.

5. MONITORING LANGUAGE NEEDS AND IMPLEMENTATION

DPH programs will conduct ongoing reviews of the language access needs of our client populations, and DPH will conduct a periodic survey of programs and update and monitor the implementation of this policy and these procedures, as necessary. On an ongoing basis, DPH will assess changes in demographics, types of services or other needs that may require re-evaluation of this policy and its procedures. In addition, DPH will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, and feedback from the public, staff, and community-based organizations, etc.

PROCESS: N/A

APPENDIX I
State of Connecticut Approved Vendors

A. In Person Interpretation and Translation including Document Translation		
Contract #	**Vendor**	**Contact**
14PSX0152AA Start: 05/01/2015 End: 04/30/2020	**1-Stop Translation USA, LLC** DBA: 1-Stop Asia 3700 Wilshire Blvd. Ste 630 Los Angeles, CA 90010 Core Vendor ID: 0000166368	**Pricilla Niode** Phone: (213) 480-0011 FAX: (213) 232-3223
14PSX0152AB Start: 05/01/2015 End: 04/30/2020	**A2Z Global,LLC** 230 E. Cuthbert Blvd. Haddon Township, NJ 08108	**Caroline Rapone** Phone: (856) 833-0220 FAX: (856) 854-0491
14PSX0152AC Start: 05/01/2015 End: 04/30/2020	**Accuworld International, LLC** 361 Park Road, Suite 1 West Hartford, CT 06119 Core Vendor ID: 0000011070	**Susan E. Joyce** Phone: (860) 561-3388 FAX: (860) 561-7247
14PSX0152AD Start: 05/01/2015 End: 04/30/2020	**Andreas Werner** DBA: The Language Link of Connecticut 354 Main St. Newington, CT 06111 Core Vendor ID: 0000015795	**Andy F. Werner** Phone: (860) 561-5438
14PSX0152AF Start: 05/01/2015 End: 04/30/2020	**Geneva Worldwide, Inc.** 256 West 38th Street New York, NY 10018 Core Vendor ID: 0000166369	**Shana Reiss** Phone: (212) 255-8400 x363 FAX: (212) 255-8409
14PSX0152AG Start: 05/01/2015 End: 04/30/2020	**Global Arena, LLC** 230 South Broad Street Philadelphia, PA 19102 Core Vendor ID: 0000166358	**Lucy Engelhart** Phone: (215) 735-1055 FAX: (215) 735-4188
14PSX0152AH Start: 05/01/2015 End: 04/30/2020	**International Institute of CT** 670 Clinton Ave Bridgeport, CT 06605 Core Vendor ID: 0000013047	**International Institute of CT** Phone: (203) 336-0141 FAX: (203) 339-4400
14PSX0152AI Start: 05/01/2015 End: 04/30/2020	**Interpreters and Translators, Inc.** 263 Main Street Manchester, CT 06042-3538 Core Vendor ID: 0000010430	**Kathryn Howroyd** Phone: (860) 647-0686 FAX: (860) 646-3590
14PSX0152AJ Start: 05/01/2015 End: 04/30/2020	**Language Link Corp** 900 Chapel St. New Haven, CT 06510 Core Vendor ID: 0000144010	**Marisa Gillio** Phone: (203) 734-9003 FAX: (203) 285-8656
14PSX0152AK Start: 05/01/2015 End: 04/30/2020	**Latitude Prime LLC** 80 South 8th Street, Suite 900 Minneapolis, MN 55402 Core Vendor ID: 0000166357	**Elle Brigitte Jahansouz** Phone: (888) 341-9080 FAX: (888) 341-9120

A. In Person Interpretation and Translation including Document Translation		
Contract #	**Vendor**	**Contact**
14PSX0152AL Start: 05/01/2015 End: 04/30/2020	**Maria Jose Pastor** 13 Winding Trail Middlebury, CT 06762 Core Vendor ID: 0000010960	**Maria Jose Pastor** Phone: (203) 758-1836 FAX: (203) 758-1837
14PSX0152AM Start: 05/01/2015 End: 04/30/2020	**Northwest Interpreters, Inc.** DBA: NWI Global 12500 SE 2nd Circle Vancouver, WA 98684 Core Vendor ID: 0000075083	**Vic Marcus** Phone: (866) 468-7769
14PSX0152AN Start: 05/01/2015 End: 04/30/2020	**Office Systems of Connecticut, Inc.** DBA: ABC Language Services 1880 Silas Deane Hwy - Suite 202 Rocky Hill, CT 06067 Core Vendor ID: 0000021394	**P. J. Kamani** Phone: (860) 250-3579 FAX: (860) 540-1101
14PSX0152AO Start: 05/01/2015 End: 04/30/2020	**Option Quest LLC** DBA: Language Queen 750 Main Street Hartford, CT 06103	**Dan Banici** Phone: (860) 869-3409 FAX: (860) 276-9487
14PSX0152AP Start: 05/01/2015 End: 04/30/2020	**Rapport International LLC** 93 Moore Road Sudbury, MA 01776	**Wendy Pease** Phone: (978) 443-2540 FAX: (206) 339-7160
14PSX0152AQ Start: 05/01/2015 End: 04/30/2020	**RDP Agency LLC** 80 Boulanger Avenue West Hartford, CT 06110 Core Vendor ID: 0000061868	**Raquel Pacheco** Phone: (860) 881-8181 FAX: (860) 331-8535
14PSX0152AS Start: 05/01/2015 End: 04/30/2020	**The Latino Way LLC** 330 Main Street, Third Floor Hartford, CT 06106 Core Vendor ID: 0000153578	**Maria J. Lino** Phone: (860) 816-1783
14PSX0152AT Start: 05/01/2015 End: 04/30/2020	TransFluenci, LLC 71 Spruceland Rd. Enfield, CT 06082 Core Vendor ID: 0000075084	**Jessica Ridley** **Phone: (413) 737-1888** **FAX: (413) 737-0188**

B. Telephone Translation and Interpretation Services		
Contract #	**Vendor**	**Contact**
15PSX0133AB Start: 06/01/2015 End: 05/31/2020	**Corporate Translation Services, Inc** DBA: CTS LanguageLink 911 Main Street, Suite 10 Vancouver, WA 98660 Core Vendor ID: 0000166863	**Sarah Gamble** Phone: (360) 433-0441 FAX: (360) 433-0441
15PSX0133AA Start: 06/01/2015 End: 05/31/2020	**Linguistica International** 570 East 3900 South Salt Lake, UT 84107 Core Vendor ID: 0000130778	**Rene Gomez, Sabrina Morales** Phone: (801) 262-4550 FAX: (801) 262-4622
15PSX0133AC Start: 06/01/2015 End: 05/31/2020	**Voiance Language Services, LLC** 5780 N Swan Rd Tucson, AZ 85718	**Kenneth Mowbray** Phone: (800) 713-4950 x183

C. American Sign Language (ASL) Interpreting Services		
Contract #	**Vendor**	**Contact**
16PSX0150 Start: 09/12/2016 End: 09/11/2019	AllWorld Language Consultants, Inc. 172 Rollins Ave. Rockville, MD 20852-4005	Carlos Scandiffio Phone: (301)385-6518 E-Mail: scandiffio@alcinc.com
16PSX0150 Start: 09/12/2016 End: 09/11/2019	American Sign Language, Inc. 444 E. 20th St., Ste. ME New York, NY 10009	Jennifer Thompson Phone: (855)634-2754 Email: contracts@asli.com; billing@asli.com
16PSX0150 Start: 09/12/2016 End: 09/11/2019	Bilingual Professional Agency, Inc. 1663 East 17th St. Brooklyn, NY 11229	Maria Jimenez Phone: (718)382-2026 FAX: (718)732-1130 E-Mail: mjimenez@signtalk.com
16PSX0150 Start: 09/12/2016 End: 09/11/2019	CODA Link Conn, Inc. 160 Batterson Dr. New Britain, CT 06053	Donna Fernandez Phone: (954)557-5166 / (860)682-4499 E-Mail: donnaroma13@gmail.com
16PSX0150 Start: 09/12/2016 End: 09/11/2019	CoSignCT, LLC 34 Shelley Rd. Middletown, CT 06457	Leslie Warren Phone: (800)212-3300 E-Mail: lawcrdr@gmail.com
16PSX0150 Start: 09/12/2016 End: 09/11/2019	Interpreters and Translators, Inc. 263 Main Street Manchester, CT 06042-3538	Marisol Reyes-Hernandez Phone: (860) 647-0686 FAX: (860) 967-9335 E-Mail: mrhernandez@ititranslates.com
16PSX0150 Start: 09/12/2016 End: 09/11/2019	Partners Interpreting, LLC 60 Man Mar Drive, Suite 5 Plainville, MA 02762	Paul Tracy Phone: (508-699-1477 FAX: (508) 342-7200 E-Mail: pault@partnersinterpreting.com

C. American Sign Language (ASL) Interpreting Services		
Contract #	**Vendor**	**Contact**
16PSX0150 Start: 09/12/2016 End: 09/11/2019	The American School for The Deaf 139 North Main St. West Hartford, CT 06107	Jeffrey S. Bravin Phone: (860)570-2206 FAX: (860) 570-2293 E-Mail: jeff.bravin@asd-1817.org
16PSX0150 Start: 09/12/2016 End: 09/11/2019	Voiance Language Services, LLC 5780 N. Swan Rd. Tucson, AZ 85718	Todd Torman E-Mail: marketing@voiance.com