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TITLE VI

EFFECTIVE COMMUNICATION WITH PERSONS OF
LIMITED ENGLISH PROFICIENCY (LEP)

POLICY

It is the Connecticut Department of Social Services' (DSS) policy to maintain a system whereby staff providing services or information in person, in writing or by telephone is able, during all hours of DSS operation, to communicate effectively with LEP beneficiaries and to provide such services in an equal manner, to ensure inclusivity of clients without regard to ability to converse in any one language. DSS is committed to serving its clients without discrimination on grounds of race, color or national origin.

PROCEDURES

A bilingual staff or other translator/interpreter may be utilized when providing service or information to an LEP person when the need for same is identified. This should be done without undue delay. LEP persons will not be required to provide or pay for the services of an interpreter. **Staff will not rely on family members or friends of LEP persons to serve as interpreters unless the LEP person expressly requests such an arrangement. Please be aware that an adult family member or friend of the LEP beneficiary may not himself/herself be qualified to interpret the information accurately or completely. Young children will not be asked to translate or interpret.**

DSS will identify and record the primary language of its clients at the earliest possible opportunity. Primary language shall mean language normally used by the client to conduct his/her day-to-day affairs. This would include the language spoken at home or the language used to conduct essential functions outside the home such as shopping, working, worshipping, etc.

In order to alert DSS staff to a client's primary language and the need for matching an LEP client with a bilingual worker or need to use an interpreter, DSS will adhere to a procedure that will contain, at a minimum, the following steps:

LEP Policy
Page 2

- (a) For those clients known to DSS as LEP, a distinctive mark or notation shall be made on their case files or other records that accompany them during the service delivery process.
- (b) For those clients whose primary languages are not known to DSS, DSS will ask them to self-identify as services are delivered. DSS will use other feasible and effective means to identify its LEP clients including those who seek benefits, services or information from DSS for the first time. Once a client is identified as having LEP, DSS will tag the case file or other records of that client in the manner described under (a).
- (c) Whenever possible LEP clients will be assigned to bilingual workers. When this is not possible, an interpreter will be used to ensure effective communication.
- (d) If no bilingual worker or any in-house interpreter is available, DSS workers can access a telephonic interpreting service from their desk using conference call capability or from specific interview booths where there are telephones with speakerphone capability.

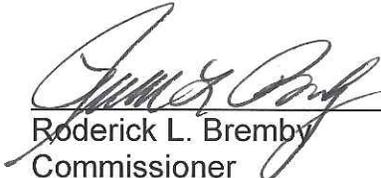
OVERALL COORDINATION:

The Affirmative Action Division has been designated to coordinate DSS activities and to serve as liaison with community groups and government agencies in matters relating to effective communication with and equal services to LEP persons. This role also includes the following duties:

1. Initial and ongoing dissemination of this policy to staff in client contact positions, to LEP populations, and to other interested persons;
2. Taking appropriate steps to ensure that DSS staff and other persons used as interpreters (a) can fluently and accurately communicate concerning DSS subject matter in the language(s) in which they profess proficiency, (b) are able to interpret effectively to and from such language(s) and English, and (c) understand the obligation of interpreters to maintain client confidentiality.

LEP Policy
Page 3

3. Instituting cultural awareness programs for staff that may be unfamiliar with the customs, attitudes and traditions of LEP populations for whom DSS provides services.
4. Instituting orientation and in-service training programs for staff, regarding compliance with this policy.
5. Resolution of complaints or other difficulties regarding availability and conduct of bilingual staff or interpreters and maintaining the files and records of complaints filed thereunder.
6. Taking appropriate steps to ensure that needs assessment regarding the need to have more bilingual staff be completed.
7. Monitor ongoing implementation of agency-wide Telephonic Interpreting Services.
8. Quarterly monitoring of the effectiveness of the measures being taken by DSS to communicate with and provide equal services to LEP persons.



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