STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH

Policy Name:	Policy and Procedures for Communicating with Persons of Limited English Proficiency	Number:	HE 01-001
Procedure:	See Page 2		
Applies to:	All DPH Employees, program contractors		
Contact:	Office of Health Equity Director		
Effective Date:	August 1, 2015	Last Reviewed:	July 1, 2015
Approved:	Jewel Mullen	Commissioner, Department of Public Health	

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.

POLICY:

The Connecticut Department of Public Health (DPH) will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access to 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 applies to all staff, programs, and operations of DPH. It will be periodically reviewed and updated as appropriate to be consistent with the agency mission and strategic planning efforts.

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 will not be used as interpreters unless specifically requested by that individual and only after 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 them, by the relevant DPH program.

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

3. PROVIDING WRITTEN TRANSLATIONS

(a) When translation of vital documents is needed, each DPH program will submit documents for translation into frequently-encountered languages to the DPH Office of Health Equity (860-509-7140). Original documents being submitted for translation will be in final, approved form with updated and accurate legal and health/medical information.

(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.

(c)DPH will set benchmarks for translation of vital documents into additional languages over time.

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 (including 410 Capitol Avenue, 450 Capitol Avenue, and the Public Health Laboratory). 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:

It is the policy of DPH to fully comply with state and federal civil rights laws and statutes, and non-discrimination requirements. The *Non-Discrimination in the Provision of the Department of Public Health Programs and Services Policy* specifies these statutory prohibitions. All questions and concerns regarding this policy and its application should be directed to: DPH Equal Employment Opportunity Manager, Amanda Anduaga-Roberson, at 410 Capitol Avenue, Hartford, CT, 06134; phone: 860-509-7267.

APPENDIX IA
State of Connecticut Approved Vendors
Interpretation and Translation including Document Translation

I. 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 E-Mail
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 E-Mail
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 E-Mail
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: 2122558400x363 FAX: (212) 255-8409 E-Mail
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 E-Mail
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 E-Mail
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 E-Mail
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 E-Mail
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 E-Mail

APPENDIX IA
State of Connecticut Approved Vendors
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 E-Mail
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 E-Mail
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 E-Mail
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 E-Mail
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 E-Mail
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 E-Mail
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 E-Mail
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** **E-Mail**

APPENDIX IA
State of Connecticut Approved Vendors
Interpretation and Translation including Document Translation

II. 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 E-Mail
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 E-Mail
15PSX0133AC Start: 06/01/2015 End: 05/31/2020	**Voiance Language Services, LLC** 5780 N Swan Rd Tucson, AZ 85718	**Kenneth Mowbray** Phone: 8007134950x183 E-Mail

APPENDIX IB
State of Connecticut
Department of Rehabilitation Services: Interpreting Unit
Certified Sign Language Interpreting Services

The Connecticut Department of Rehabilitation Services (DORS) Interpreting Unit provides certified sign language interpreting services to the community on a fee for service basis, 24 hours / seven (7) days a week.

DORS monitors a statewide Interpreter Registry. All sign language interpreters working for compensation in Connecticut must satisfy the mandates of established law, CT General Statute Sec. 46a-33a, including annual registration with the Interpreting Unit and submission of documented credentials, including certification by a nationally recognized board.

Phone:
•(800) 708-6796 Toll Free
•(860) 231-1690 Voice/TTY
•(860) 899-1674 Videophone
•(860) 231-8746 Fax

E-mail: DORS.Interpreting@ct.gov
Website: http://www.ct.gov/dors/site/default.asp