

Procedure to Communicate with Persons with Limited English Proficiency (LEP)

Purpose: To ensure that all persons, including those with LEP, have meaningful access and an equal opportunity to participate in services, activities, programs, and benefits, and team members have access to processes to create forms and signs to notify customers.

Scope: This procedure applies to all team members.

Definitions: N/A

Procedure:

Identify patients with LEP and their language:

Field care navigators (FCNs) identify patients with LEP and their language as part of the normal process of relationship-building and formal assessment. If necessary, FCNs or other team members will use language identification cards or posters available at <https://www.lep.gov/> to determine a person's language. The language used to communicate is documented in the patient's file.

Provide company resources

- Multilingual Team Members: Master•Care seeks to hire team members fluent in languages besides English and train them to provide interpretation services as part of their duties.
- Database: The company maintains a comprehensive database of local and county interpreters, cultural centers, and providers who specialize in specific cultures/languages. Provider relations coordinators are responsible for maintaining this database of resources for their region.

Offer access to language assistance

The Company takes reasonable steps to provide meaningful and timely access to language assistance, free of charge, to communicate effectively with patients with LEP, including:

- Providing electronic and/or software programs or activities unless financially or administratively burdensome. Any burden will be documented.
- Engaging an interpreter resource.

Offered language assistance and any refusal of such services will be documented.

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Connect patients with LEP to an interpreter

- The care navigator determines the best source for interpretation services during the initial assessment and offers an interpreter free of charge. If the patient declines, they document the offer and the patient's response.
- Intake packets inform patients with LEP of the availability of free language assistance in writing in multiple languages.
- If the patient asks to use a family member or friend as an interpreter, the care navigator ensures the patient understands an interpreter is available at no charge.
- If a family member or friend is selected, the care navigator considers issues of competency of interpretation, confidentiality, privacy, and conflict of interest. If the person selected is not appropriate for any of these reasons, they provide competent interpreter services.
- Minor children are prohibited from serving as interpreters a due to challenges in understanding care navigation services and terminology.
- The use of other patients for interpretation is prohibited for confidentiality reasons.

Verbal Communications with persons with Limited English Proficiency

- Determine how well the person understands English by asking simple questions after initially greeting the patient.
- Use gestures or simple words to communicate where language barriers exist.
- If the person has difficulty answering or understanding, locate someone to interpret.
- Obtain assistance facilitating communication from a coworker, regional manager, or manager.
- Inform interpreters not to change any information and relay it exactly as provided.
- Verify the message was understood by asking interpreters to repeat the message back in English.
- If the interpreter process is not suitable or working, inform a manager or regional manager and use other Company aids for communication.

Monitoring Language Needs and Implementation

The Company assesses changes in demographics, types of services, or other needs that may require reevaluation of this policy and its procedures regularly. The COO or designee performs this assessment including assessing the efficacy of:

- mechanisms for securing interpreter services,
- equipment used for the delivery of language assistance,
- complaints filed by people with LEP, and
- feedback from patients and community organizations, etc.

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References:

- [HHS Language Access Plan](#)
- [HHS Translated Resources for Covered Entities](#)
- [HHS Language Assistance Services](#)
- For sample notification see FM-10.

