

# Systems of Hope Language Access/Interpreter Policy and Procedures

## The Legal Rights of Linguistic Persons

### Provisions related to language access

All service providers should [develop and] implement policies and procedures to provide access to services and information in appropriate languages other than English [or the dominant language] to ensure that persons with limited English proficiency (LEP) and persons with hearing impairment are effectively informed and effectively participate in any benefit.

### Title VI of the 1964 Civil Rights Act

"No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." 42 U.S.C. § 2000d.

### Precedent

The United States Supreme Court in *Lau v. Nichols* (1974) stated that a person's language is so inherently connected to their national origin that language-based discrimination is effectively a alternative for national origin discrimination.

### I. Purpose

This Procedure establishes the policy and guidance for Harris County Systems of Hope staff (thereafter SOH staff), partner agencies, and vendor/contract personnel. The purpose of this policy is to:

- A. Describe the essential practices and processes for the proper provision of interpretation, language access, and translation services.
- B. Raise awareness of interpretation (including sign language) and translation needs and to encourage SOH staff, partner agencies, and vendor/contract personnel to proactively plan for the growing needs of the diverse service population in Harris County.
- C. Ensure that SOH staff, partner agencies, and vendor/contract personnel have knowledge of how to access interpretation and translation services and the confidence to use them.

### II. Policy

It is the policy of Harris County Systems of Hope that all SOH staff, partner agencies, and vendor/contract personnel will provide readily accessible resources for youth and families with limited English proficiency (LEP), to include speech, hearing, and/or visual impairment. This includes but is not limited to the use of bi-lingual or multi-lingual staff, interpreters, the use of special devices, and/or other communication aids as needed to facilitate effective, culturally and linguistic competent communication. To ensure culturally and linguistically responsive services to our families who have limited English proficiency or hearing impairment, an interpreter needs to be present or made available by phone when communication with staff is essential while receiving services. Services must be provided to families in their preferred language, both verbal offers and written communication informing them of their right to receive language assistance services.

***Under no circumstance should youth under the age of 18 be the interpreter for families or individuals referred to, or enrolled in Systems of Hope.***

It is the policy of Systems of Hope, its agents and contract personnel shall not deny care and treatment to or otherwise discriminate against persons who are non-English speaking, deaf or hard of hearing, and visually impaired. In addition, Systems of Hope staff, partner agencies, and vendor/contract personnel shall facilitate access to services by persons who are non-English speaking, deaf or hard of hearing or visually impaired persons.

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## III. Procedure

### LANGUAGE ACCESS SERVICES:

1. Systems of Hope Care Team and/or Centralized Intake at the first point of contact shall:
  - a. Review the referral for the family's preferred/spoken language;
  - b. Assess the need for an interpreter or other communication devices or aids during contact with the family; and
  - c. Communicate language or interpretive needs to the assigned Care Team.
2. Systems of Hope staff, partner agencies, vendors/contract personnel shall:
  - a. Utilize vendor agencies contracted by Systems of Hope, or contracted by the origin of services that provide language access services to consumers, including interpretation and translation services in order facilitate communication for program services, Child & Family Team meetings, engagement and planning related to provision of services to families with Limited English Proficiency.
  - b. Utilize/hire bilingual/multi-lingual staff in order to provide direct services to the SOH youth/family.
  - c. Have documents and marketing material available in the preferred language of the family.
  - d. As part of Child & Family Team meeting refer family to community resources that assist persons with Limited English Proficiency (LEP) as well as speech/hearing/visual impairment.
  - e. As part of the transition process and discharge planning, link family with natural supports to facilitate family communication needs.
  - f. Utilize available community resources for language and communication needs.
  - g. It is preferred that an adult family member can serve as an interpreter for the youth/family enrolled in Systems of Hope. If an adult family member is unavailable, a youth can serve as an interpreter.
  - h. Plans of care and services developed for persons with limited English proficiency (LEP) as well as speech/hearing/visual impairment or who for any reason are unable to read or write, shall identify any significant related impact on such persons' functioning and treatment, and identify associated recommendations for treatment, including reasonable accommodations.
  - i. Document all efforts to assist families with interpretive, communication & translation needs.
  - j. If the cost becomes prohibitive it is the responsibility of the care team or service provider to contact Systems of Hope Project Director.

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## 3. HEARING

1. Telecommunication device for the deaf (TTY/TDD).
  - a. Contact a Systems of Hope administrator to assist with relaying telephone messages to those youth/family with TTY/TDD phone equipment.
2. Use of but not limited to: writing boards, note pads, picture/word boards, printed information.
3. Sign language interpreter:
  - a. Contact a Systems of Hope administrator to schedule an interpreter.

## 4. VISUALLY IMPAIRED

1. Read aloud information provided to the youth/family.
2. Provide large print youth/family information and educational materials applicable to the youth/family's need.
3. Tape-recorded information.
4. Recommend visual adaptive aids (i.e. magnifiers).
5. Referral to resources in community with visually impaired services.

### **Interpretation and translation services**

Systems of Hope contracts with several vendors for language services. For interpretation or document translation services, contact the SOH Administrative Assistant.