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Owner Amy Johnson:
Director Patient
Access
Area Administration
Applicability Logan System

Translation and Interpretive Services, A111

PURPOSE

To affirm and outline the process in place to achieve Logan Health's goal of providing persons with Limited English Proficiency and/or who have a disability that affects their ability to communicate through reading, writing, or speaking meaningful access relative to their medical condition and treatment.

POLICY

1. Logan Health will take reasonable steps to provide persons with Limited English Proficiency (LEP) and/or who have a disability that affects the ability to communicate through reading, writing, or speaking with meaningful access and an equal opportunity to access and receive services relative to their medical conditions and treatment, including information contained in vital documents such as waivers of rights, consent to treatment forms, financial and insurance benefit forms, etc.
2. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served, and patients and their families will be informed of the availability of such assistance free of charge.
3. Logan Health will conduct a regular review of the language access needs of our patient population, as well as update and monitor the implementation of this policy and these procedures, as necessary.
4. Language assistance will be provided through formal arrangements with organizations providing interpretation or translation services, or technology and telephonic interpretation services.
5. All staff will be provided notice of this policy and procedure, and staff who may have direct contact with LEP individuals will be trained in effective communication techniques, including the effective use of an interpreter and translation services.

PROCEDURE

IDENTIFYING LEP PERSONS AND THEIR LANGUAGE

1. Logan Health staff will promptly identify the language and communication needs of the LEP patient upon arrival at the healthcare facility or clinic.
2. Document language preference and any language-related communication needs in patient's medical record.
3. Electronic medical records of interactions with patients will reflect the language used to communicate with the patient and will be included as part of the record.
 - A. Type of translation used documenting that a translator was present for the visit
 - B. Modality of translation used (telephonic, video, in-person) and name of witness present.

OBTAINING A QUALIFIED INTERPRETER

To assure impartial or unbiased communication, it is necessary to offer the services of a qualified medical interpreter even if the patient prefers a family member or friend. There are three modalities available to patients

1. **Over the phone (OPI)** – recommended for follow-up phone calls, where video technology is not available, and in situations where video may not be clinically necessary to communicate with the patient. Job aides for how to access OPI can be found at: <https://loganhealth.sharepoint.com/sites/LanguageTranslationServices> .
2. **Video Remote Interpretation (VRI)** – recommended for most cases including extended or complex conversations, during a telehealth visit, when there are multiple people in the room, or when observing body language, facial expressions, and room dynamics would be beneficial to the conversation. Job aides for how to access VRI can be found at: <https://loganhealth.sharepoint.com/sites/LanguageTranslationServices>.
3. **In-person:** For patients located in Logan Whitefish or Kalispell locations, if modalities such as video or telephone will not meet the needs of the patient, a local interpreter may be requested by the department in need. Advanced scheduling is required and the interpreter can be reached at 406-890-5832

PROVIDING WRITTEN TRANSLATIONS

1. Vital documents in frequently encountered languages are provided within a reasonable time frame, considering urgency and complexity.
2. Facilities provide translation of other written materials, if needed, as well as written notice of the availability of translation, free of charge.
3. Logan Health will set benchmarks for translation of vital documents into additional languages.
4. When time sensitive forms cannot be translated in a timely manner, use approved translation services to verbally translate forms. A witness is recommended to be present for this

translation. The type of translation and modality of translation used is documented in the EHR.

ADDITIONAL PROVISIONS

1. Blind/Low Vision
 - A. LH personnel will communicate information contained in written materials concerning treatment, benefits, services, waivers of rights and consent to treatment forms by reading out loud and explaining these forms to persons who are blind or who have low vision.
 - B. In addition, LH personnel is available to assist persons who are blind or who have low vision in filling out forms and in providing information in a written format.
2. Speech Impairment
 - A. LH personnel will provide aids and service as well as writing materials and computers to assist persons who have a speech impairment.
3. Manual Impairment
 - A. LH personnel will assist patients who have difficulty in manipulating print materials by holding the materials and turning pages as needed, or by providing note takers.

DOCUMENTATION OF INTERPRETOR IN ELECTRONIC HEALTH RECORD (EHR)

1. Effective documentation of interpreter services in the EHR is crucial for maintaining accurate patient records and providing continuity of care. When interpreters are used during patient communication, staff will create a comment in the note section in the account including:
 - A. Identification of interpretation service used (agency name or service provider)
 - B. Modality of translation used (telephonic, video or in-person)
 - C. Interpreter's role
 - D. Interpreters role and summary of communication translated such as medical history, treatment plans, patient concerns, or important instructions given to the patient
 - E. Observed patient understanding of interpreted information

PROVIDING NOTICE

Logan Health informs patients of the availability of language assistance, free of charge, by providing written notice in languages patients will understand. At a minimum, notices and signs are posted and provided in intake areas and other points of entry, including but not limited to the emergency room, outpatient areas, etc.

MONITORING LANGUAGE NEEDS AND IMPLEMENTATION

On an ongoing basis, Logan Health assesses changes in demographics, types of services or other needs

that may require reevaluation of this policy and procedure. In addition, Logan Health regularly assesses 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 and feedback from patients.

DEFINITIONS

Limited English proficiency (LEP) is a term used in the United States that refers to a person who is not [fluent](#) in the [English language](#), often because it is not their [native language](#).

Language Interpretation: The process of conveying a spoken message from one language to another in real-time. This includes both Over-the-Phone Interpretation (OPI), where an interpreter assists remotely via telephone, and Video Remote Interpretation (VRI), where an interpreter aids through a video conferencing platform.

Translation: The process of converting written information from one language to another while preserving its meaning and intent.

Vital Documents include, but are not limited to: applications; consent forms; complaint forms; intake forms with potential for important health consequences, letters or notices pertaining to eligibility for benefits; letters or notices pertaining to rights and the reduction, denial or termination of services or benefits or that require a response from the LEP person;

REFERENCES

Section 1557 Affordable Care Act 53-21-142 M.C.A.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq.

The Americans with Disabilities Act (ADA) (PL 101-336)

<https://www.cms.gov/About-CMS/Agency-Information/OMH/Downloads/Language-Access-Plan-508.pdf>

Approval Signatures

Step Description	Approver	Date
Final Admin Approval	Mary Lowrance: Executive Director Quality Improvement	11/2023
Admin Approval 1	Daniel Short: Chief Medical Officer	10/2023
Policy Committee	Kelly Stimpson: Associate General Counsel	09/2023

Reviewer	Daniel Short: Chief Medical Officer	09/2023
Owner	Amy Johnson: Director Patient Access	09/2023

Applicability

Logan Health (locations excluding LHMC), Logan Health Chester, Logan Health Conrad, Logan Health Cut Bank, Logan Health Medical Center, Logan Health Shelby, Logan Health Whitefish

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