It is the policy of District 2 Public Health to provide meaningful language access to limited English proficient and/or sensory impaired customers across all programs and activities conducted or supported by District 2. District 2 Public Health offers communication assistance by securing and utilizing interpreters, translators and other necessary communicative resources when serving LEP and SI customers.

District 2 policy and procedures are in accordance with the following authorities:

- Americans with Disabilities Act (ADA) of 1990, Title II
- Rehabilitation Act of 1973 (Sec. 504)

**Title VI of the Civil Rights Act of 1964, 42 U.S.C. Section 2000d.et seq.** prohibits recipients of Federal financial assistance from discriminating on the basis of race, color, or national origin. Specifically Section 601 of Title VI states: “No person in the United States shall on the ground of race, color or national origin, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance”.

Regulations implementing Title VI provide in part at 45 C.F.R. Section 80.3 (b):

“(1). A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin:

(i). Deny an individual any service, financial aid, or other benefit provided under the program;

(ii). Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program; …

(2). A recipient, in determining the types of services, financial aid, or other benefits, or facilities which will be provided under any such program, or the class of individuals to whom, or the situations in which, such services, financial aid, other benefits, or facilities will be provided… may not, directly or through contractual or other arrangements, utilize criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respect individuals of a particular race, color, or national origin.”
Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990 (ADA) prohibit covered entities from discriminating against persons with disabilities in the provision of benefits and services or the conduct of programs or activities on the basis of their disability. Section 504 applies to programs or activities that receive Federal financial assistance. Title II of the ADA covers all of the services, programs, and activities conducted by public entities (state and local governments, departments, agencies, etc.) including licensing.

Section 504 and the ADA protect qualified individuals with disabilities from discrimination on the basis of their disability. An individual with a disability is a person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such impairment. Major life activities means functions such as caring for one’s self, performing manual tasks, walking, seeing, hearing, breathing, learning and working.

Employees are informed of District 2 Public Health’s Policy of Non-Discrimination during new employee orientation. In addition, information is disseminated during planned trainings or leadership meetings as deemed necessary by the District 2 Management Team. It is the responsibility of the employee’s supervisor to assure staff members are informed of policies and trainings.

District 2, Health Director
David N. Westfall, MD, MPH, CPE

Date
DISTRICT 2 PUBLIC HEALTH, LIMITED ENGLISH PROFICIENT
& SENSORY IMPAIRED PROCEDURES

I. Identification of LEP/SI Customers

A Notice of Interpretation Services Wall Poster (Attachment 1) is located in every patient area. This poster informs the public of District 2 Public Health’s Language Access policy to provide free interpretation services.

Identification of needed interpretation services is identified at point of contact with all patients. The patient identifies language spoken via the Language Line Identification Card (Attachment 2) for languages other than Spanish. If language is other than Spanish, staff calls the Language Line (Attachment 3) for assistance with interpretation services. When utilizing the services of a language contractor, staff must be present for on-site and telephone interpretation services. Staff persons are required to be present either via speaker telephone or 3-way conference when language contractors (interpreters) contacts customers via telephone. When services are provided through a 3-way conference call, the staff person must use an agency phone. A Quick Reference Guide (Attachment 4) is available to staff to assist them with Language Line Services. Hall County employs bilingual staff to serve Spanish speaking clients in all clinics. If the language identified is Sign Language, then staff contacts Sign Language Interpreting Specialists, Inc. (Attachment 5).

When interpretative services are declined by clients, staff documents the information in the client record and client completes Waiver of Rights to Free Interpreter Services (Attachment 6). This document is placed in client chart and a copy is given to the client.

Cultural diversity is respected and taken into consideration for all clients. Staff is trained in LEP and cultural diversity.

II. Language Contractors

District 2 Public Health utilizes the State of Georgia Translation Services Contract (Interpretive Services Contract, (Attachment 7) to provide language assistance services on an “as needed” basis. These contractors have terms and conditions that have been agreed upon, and Divisions and Offices are not required to enter into negotiations prior to or during service delivery.

III. Translation of Documents

Translators and translation services will ensure that the translated text reflects a sound conceptual understanding of the source material; hence, translators will secure a verifiable and independent, certified or qualified translator to proof read the final document. All proofreaders will meet the criteria established for primary translators as per state wide contract. Translators and translation services take into consideration the foreign language and English literacy levels of the intended audience when translating District 2 Public Health materials. All source documents and related files, along with the finished product will be returned to the requesting county, program or District office.

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Documents containing occupation-specific terminology (such as medical and legal) will be translated by individuals who are qualified or certified to translate in those specific fields.

District 2 Public Health utilizes the State of Georgia Translation Services Contract (Interpretative Services Contract, (Attachment 7) for translation services. The following procedure will be utilized:

- The Health Department will have a document for translation which will be approved by the County Nurse Manager/County Office Manager prior to submission for translation.
- The document will be sent to a translator service(s) on the state wide contract for a quote.
- After a quote is agreed upon, the county health department will forward a purchase order number with the appropriate document needing translation.
- The contractor will provide the agreed upon translation within 48 hours.
- The contractor will return the translated document and invoice to the appropriate county health department.
- The county health department will submit paperwork for contractor to be paid.

IV. Monitoring and Complaint Resolution Process

Monitoring

Compliance with polices and procedures and service delivery to LEP/SI customers is monitored by individual supervisors throughout District 2 Public Health. Concerns and/or questions are directed to District 2 Language Access Coordinator or District 2 Management Team.

Complaint Resolution Process

A Policy/Notice of Non-Discrimination in Services (Attachment 8) is posted in patient areas. Managing complaints of discrimination by LEP and SI customers is accomplished in accordance with existing District 2 policies and procedures. In addition, complaints related to access to services by LEP and SI customers are forwarded to the District 2 Language Access Coordinator and/or District 2 Management Team. Complaints may be submitted in any format. Complaints will be investigated and action taken, if necessary.

V. Attachments

1 - Notice of Interpretation Services Wall Poster
2 - Language Line Identification Card
3 - Language Line Access Card
4 - Language Line Quick Reference Guide
5 - Sign Language Interpreting Specialists, Inc.
6 – Waiver of Rights to free Interpreter Services (English & Spanish)
7 - State of Georgia Translation Services Contract (Interpretive Services Contract)
8 - Policy/Notice of Non-Discrimination in Services – General (English & Spanish)