

## BAY-ARENAC BEHAVIORAL HEALTH AUTHORITY POLICIES AND PROCEDURES MANUAL

<b>Chapter: 4</b>	<b>Care and Treatment Services</b>		
<b>Section: 8</b>	<b>Customer Rights and Protections</b>		
<b>Topic: 13</b>	<b>Accommodations for Communication Services</b>		
Page: 1 of 6	<b>Supersedes Date:</b> Pol: 5-15-03, 6-20-02 Proc: 3-18-11, 6-14-10, 1-5-10, 8-28-08, 3-20-08, 3-19-03, 3-16-00 (previously C07-S03-T06)	<b>Approval Date:</b> Pol: 3-20-08 Proc: 10-11-13	<hr style="border: none; border-top: 1px solid black;"/> <i>Board Chairperson Signature</i>  <hr style="border: none; border-top: 1px solid black;"/> <i>Chief Executive Officer Signature</i>
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### Policy

It is the policy of Bay-Arenac Behavioral Health Authority (BABHA) that behavioral health services be available and provided to all persons seeking services in Bay and Arenac counties who demonstrate a need for accommodations for communication due to Limited English Proficiency (LEP). All direct operated and contracted programs will abide by LEP guidelines and will provide an augmentative communication specialist, voice interpreter, and translation services, whenever needed, at no cost to individuals requesting or currently receiving services.

### Purpose

This policy and procedure is established to ensure that services and supports are provided to individuals in languages, or other forms of alternative communications, that they understand.

### Education Applies to:

- All BABHA Staff
- Selected BABHA Staff, as follows:
- All Contracted Providers:  Policy Only     Policy and Procedure
- Selected Contracted Providers, as follows:
  - Policy Only     Policy and Procedure
- Other:

### Definitions

Accommodations: Internal or external resources used to provide individuals meaningful access to services at no cost to each person receiving services or applying for services. Examples include, but are not limited to, augmentative communication specialists, voice interpreters, interpreter/translation services, etc.

Alternative Communication Services: The use of resources that allow for BABHA staff to communicate in a meaningful and effective way with individuals via interpretive/translation services, voice interpreters, Braille, augmentative communication specialists, etc.

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Limited English Proficiency (LEP): The inability to speak, read, write, or understand English at a level that permits effective interaction with health care providers.

**Procedure**

Language interpretation services, including sign language, can be accessed through the following options:

1. BABHA has the capability to communicate with individuals with hearing impairments by phone in two different methods, depending on available equipment.
  - a. **Text Telephone (TTY)/Telecommunication Device for the Deaf (TDD):** BABHA has the capability to communicate with individuals with hearing impairments via TTY/TDD. TTYs are used by many people, not just people who are deaf. A TTY is a special device that lets people who are deaf, hard of hearing, or speech-impaired use the telephone to communicate, by allowing them to type messages back and forth to one another instead of talking and listening. A TTY is required at both ends of the conversation in order to communicate. To use a TTY, the caller would dial the TTY/TDD phone number of the individual that the caller is attempting to call. The caller would set a telephone handset onto special acoustic cups built into the TTY (some TTY models can be plugged directly into a telephone line). Then, the caller would type the message the caller wants to send on the TTY's keyboard. As the caller types, the message is sent over the phone line, just like the caller's voice would be sent over the phone line if you talked. The caller can read the other person's response on the TTY's text display. **BABHA's TTY/TDD number is (800) 891-2119.**
  - b. **Telecommunications Relay Service (TRS), also called Michigan Relay in Michigan:** BABHA also has the capability to communicate with individuals with hearing impairments via Michigan relay. If BABHA or BABHA contracted staff do not have access to the BABHA TTY/TDD machine located in BABHA Emergency Services as explained in option 1a above, BABHA can still call a person who is deaf, hard of hearing, or speech-impaired by using the Telecommunications Relay Service (TRS). With TRS, a special operator types whatever the caller says so that the person

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the caller is calling can read the caller’s words on his or her TTY display. He or she will type back a response, which the TRS operator will read aloud for the caller to hear over the phone. To use this service, the individual with a hearing impairment must have a TTY/TDD machine on his/her end. However, BABHA does not need a TTY/TDD machine on its end. **Michigan Relay’s phone number is: 1-800-649-3777.**

2. BABHA has the capability to communicate by phone with individuals who do not speak English via Voices for Health (VFH).

BABHA has an agreement with VFH to provide non-English language interpreter services for phone contacts. They can accommodate both immediate and scheduled phone communication. Each BABHA site has an individual access code identifying the origination of the service for invoice purposes. All staff at each site location must be acclimated to the conference call mechanism of their phone system in order to operate and access this language service. Staff should respond to the needs of the caller first before transferring to other parties as there is no “wrong door” for individuals to contact BABHA for services.

See the attachment to this policy and procedure in the BABHA Kardex binder (Accommodations for Services – Voices for Health) for information on access codes and for instructions on how to use the system.

3. Face-to-Face Contact/Additional Requirements
  - a. For face-to-face sign language/non-English language interpretive services, long-term, or more involved translation requirements, such as for ongoing therapy sessions, etc., BABHA and BABHA contracted provider staff must contact BABHA Customer Services at 1-888-482-8269 to arrange. BABHA Customer Services utilizes various resources, including but not limited to VFH (has both sign language and non-English

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language on-site interpretation available), CART reporting (utilizes a computer on-site to type what is being said by BABHA or BABHA contracted staff to the individual with a hearing impairment), V.O.I.C.E. (has sign language on-site interpretation available), etc. In addition to arranging accommodations for direct service provision, such accommodations can also be arranged for: (1) Council/Committee meetings; (2) BABHA Seminars/workshops/trainings; (3) Siblings/parents/secondary persons involved in the treatment plan of individuals receiving services.

- b. Access face-to-face on-site sign language or non-English language interpretation services by contacting BABHA Customer Services at toll free (888) 482-8269.
  - i. All requests for face-to-face interpretation should be done as far in advance as possible to ensure service will be available. BABHA Customer Services staff will arrange for the service. If a BABHA Customer Services staff is not available, BABHA staff are requested to go through their supervisors to acquire the service.
  - ii. Emergency Services can directly access VFH for phone or face-to-face on-site interpretation for ES needs without going through BABHA Customer Services. BABHA Emergency Service workers can also use the resources of McLaren Hospital-Bay Region to accomplish emergent requests after hours.

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**Attachments**

Accommodations for Services - Voices for Health (VFH) Instructions (BABHA Kardex)  
 Voices for Health Interpreter, BABHA Access Codes (BABHA Kardex)  
 Voices for Health; Interpreting Solutions, User's Guide

**Related Forms**

N/A

**Related Materials**

N/A

**References and/or Legal Authority**

Federal Register, Volume 67, No. 115, part 438.206 – Availability of Services  
 LEP Analysis from the 2000 Census  
 Policy Guidance, Title VI Prohibition against National Origin Discrimination as it Affects  
 Persons with Limited English Proficiency

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<b>SUBMISSION FORM</b>				
<b>AUTHOR/ REVIEWER</b>	<b>APPROVING BODY/COMMITTEE/ SUPERVISOR</b>	<b>APPROVAL /REVIEW DATE</b>	<b>ACTION (Deletion, New, No Changes, Replacement or Revision)</b>	<b>REASON FOR ACTION - If replacement list policy to be replaced</b>
M. Wolber	J. Pinter	02/06/08	Revision	P/P need updating in re: to accessing language and alternative communication services for consumers
M. Wolber	G. Lesley	08/28/08	Revision	Procedure and access code corrections
J. Steckley	K. Cereske	01/05/10	Revision	P/P need updating due to a new service provider
M. Corrion	CLT	06/14/10	Revision	Procedure revised due to a new site for clinical services
J. Steckley T. Sequin	K. Cereske	03/18/11	Revision	Procedure revised due to changes in to accessing alternative communication services
M. Corrion K. Cereske	PNLT	10/11/13	Revision	Triennial review: Updated with First Person Language. Updated to reflect current practice, phone numbers, codes, etc.
J. Pinter	J. Pinter	02/10/16	Revision	(Moving C04-S07-T35 (Section 7 Treatment Plan of Service and Treatment Monitoring) to C04-S08-T13 (Section 8 Customer Rights and Protections) as part of PP reorganization after closing of AAM
K.Amon	K.Amon	11/7/18	No changes	Triennial Review
K. Amon	K. Amon	10/19/22	No Changes	Triennial Review