

Hospital Assessment Tool Interpreter/Translation Services For Limited English Proficiency Patients

The following assessment tool reflects recommendations from NJHA’s Task Force that are intended to assist hospitals in their ongoing review of the services and resources they make available to patients with Limited English Proficiency. As noted, some of the recommendations are mandated under federal and state law while others may be considered for implementation. It should be recognized that there may be costs associated with the “non-mandated” recommendations, and that the finances of a hospital may determine the extent to which they can be implemented.

Bolded language reflects mandated actions to be undertaken by hospitals.

A. ASSESSMENT	Yes	No	Alternative Actions
Determine demographic information related to LEP persons within catchment area utilizing data from the Census, community organizations and local/state government. (See appendix J for specific information regarding your counties LEP population.)			
Identify languages most frequently spoken by LEP populations in your service area and determine the languages that should be considered for translation of information materials and educational resources.			

A. ASSESSMENT (cont.)	Yes	No	Alternative Actions
<p>Assess the various forms and written documents to determine those that should be translated into frequently spoken languages in your area. (See page 30 for suggested documents appropriate for translation.)</p>			
<p>Proactively assess patients' needs at registration/patient intake.</p> <p>Consider utilizing "I Speak" cards to conduct assessment when patient is pre-registered</p> <p>Consider posting notices in commonly encountered languages to promote self-identification</p>			

A. ASSESSMENT (cont.)	Yes	No	Alternative Actions
<p>Collect information on patient primary language. Ask questions in open-ended format.</p> <p>Ask two questions:</p> <ol style="list-style-type: none"> 1. What languages do you need for your healthcare services and feel most comfortable speaking with your doctor or nurse? 2. Do you need interpreter services? 			
<p>Ensure information from patient assessment is recorded in the patient's medical record and stored in an electronic format.</p> <p>Develop and apply stickers identifying patient's primary language to the patient's chart for easy identification by staff.</p> <p>Allow different hospital departments and units access to information on patient language needs through an electronic system, so appropriate services are planned and delivered from any site.</p>			
<p>Develop and provide a list of the various services and/or technologies (such as telephonic interpretation among other options) the hospital can make available to the patient. Allow the patient to select which will be most appropriate based on the patient's needs.</p>			
<p>Inform patients that services are at no charge to them.</p>			
<p>Discourage use of family members, friends, companions, etc. <u>as interpreters</u>; prohibit use of minors.</p>			

A. ASSESSMENT (cont.)	Yes	No	Alternative Actions
Require patients to sign a waiver form when the patient insists on using a family member or friend as an interpreter. Ensure the waiver form is included in the patient's record.			
Include questions in your hospital patient satisfaction surveys on the quality and effectiveness of language/communication services provided to patients who needed these services. Sample questions for this survey are included in Appendix I _____			

B. POLICIES	Yes	No	Alternative Actions
<p>Establish a policy ensuring the hospital's commitment of non-discrimination on the basis of race, color, national origin, age and disability; the policy should outline the grievance process.</p>			
<p>Establish a policy outlining how staff are expected to respond to LEP patients: Over the telephone In written communication In person</p>			
<p>Recognize there is a distinction between reasonable accommodations based on the circumstances, for example, an outpatient appointment, prescheduled inpatient admission and an Emergency Department visit. Accommodations may vary based on the specific circumstances associated with the care being provided.</p>			
<p>Develop and implement administrative policies and protocols regarding your hospital's language assistance programs.</p>			
<p>Establish a hotline number to the department coordinating interpreter services.</p>			
<p>Employ bilingual/bicultural staff at all levels of the organization to reflect the demographics of the community to allow for more effective communication among staff and community members utilizing hospital services.</p>			
<p>Establish a policy that bilingual hospital personnel will only be used in emergency situations until a qualified or certified interpreter can be present unless those personnel have been trained in medical interpretation or hired to act as interpreters.</p>			
<p>Review your hospital union contracts to determine if under the terms of your contracts you may train your unionized bilingual staff members to serve as medical interpreters for LEP populations when needed.</p>			

B. POLICIES (cont.)	Yes	No	Alternative Actions
Consider incorporating into your policies some provisions that would clarify the conditions for training of your bilingual employees in medical interpretation, for example, possible paid time off while these staff participate in training or possible compensation (such as an annual bonus or wage differential) when providing interpreter services only if services do not interfere with their unit's regular work flow and/or are provided beyond their routine work time.			
Establish a policy that allows use of family members, friends, company, etc. of the patient only under the circumstances that the patient has refused all other services, with the exception of using minors, which should be prohibited.			
Establish a policy that requires the interpreter, primary care nurse and the patient to sign a form documenting the situations for which interpretation was provided, i.e., obtaining consent, giving instructions, participating in a medical consultation, certifying the patient's confidentiality was upheld and affirming that the patient seemed to understand all interpreted information.			
Determine if reimbursement is provided by Medicaid/Medicare/Managed Care contracts as a separate fee that can be billed and reimbursed at a pre-determined rate.			
Establish a policy that calls for the assessment of the competency of interpreters.			
Establish a policy that allows family members and friends to be part of the information sharing and decision-making with the permission of the patient, if applicable (e.g. minors).			

C. STAFF TRAINING	Yes	No	Alternative Actions
<p>Provide mandatory in-service training for clinical directors, nursing supervisors and staff, registration/admission staff, triage and Emergency Department staff, etc. on the following topics:</p> <ul style="list-style-type: none"> ✓ Hospital policy and accessibility laws on serving LEP patients ✓ Best ways to identify communication needs and preferences of patient ✓ How staff can obtain services for LEP patients ✓ The goals of hospital signage and the organization policy on developing new or updated signage 			
<p>Ensure training on hospital policies and procedures for LEP patients are incorporated into the general employee orientation and that training will address the ADA.</p>			
<p>Consider the use of computer-based training that can be accessed by staff via the hospital intranet.</p>			
<p>Require mandatory classroom-based training by high-volume departments such as Admissions, Guest Services, Emergency Department, etc.</p>			
<p>Develop and provide customized staff awareness programming on the provision of services to LEP patients and make the program available to all departments on request. Ensure programs address cultural sensitivity as well as language services.</p>			
<p>Consider the development of a video that can be utilized for in-service training of employees regarding hospital policies and procedures related to services for LEP patients.</p>			
<p>Ensure staff are aware of the need to ensure every patient should have free and informed consent. Effective communication with a patient is the only way to achieve this goal.</p>			

C. STAFF TRAINING (cont.)	Yes	No	Alternative Actions
Ensure staff understands legal and regulatory mandates related to services for the LEP population.			
Explain what constitutes reasonable accommodations ranging from the use of oral interpreters to providing access to technological resources such as remote telephone interpretation, video conferencing or desktop video conferencing.			
Ensure hospital staff understands that reasonable accommodations are to be provided free of charge to the patient and that the patient is informed that there is no charge.			
Ensure staff understands that reasonable accommodations must also be provided to third parties who have limited English proficiency who accompany patients and who have the legal right to have access to healthcare information or have the authority to make healthcare decisions.			
Ensure staff know how to access available interpreter services and assistive technology when needed.			
Develop a step-by-step instruction sheet for employees identifying how, where and in which situations to obtain needed services.			
Identify who is responsible for coordinating interpreter requests during non-business hours and notify staff.			

D. RESOURCES/SERVICES	Yes	No	Alternative
Designate a hospital communications services coordinator who: <ul style="list-style-type: none"> ✓ Coordinates the provision of available technology ✓ Maintains list of phone and 24-hour pager numbers of qualified interpreters ✓ Coordinates uniformity of written materials 			
Ensure there are signs posted at appropriate places throughout the facility where people generally go for information, including admission, registration and emergency care areas. Inform persons who have limited English proficiency that the hospital provides reasonable accommodations and describe available services. Consider also posting in outpatient clinics.			
Ensure signage and notices are posted in languages commonly encountered at your hospital.			
Ensure written materials that describe the types of services available (and note that they are free of charge) are provided to patients in the appropriate language.			
Ensure the availability of complaint procedures for persons that believe they were denied reasonable accommodations.			
When encountering difficulty in obtaining an oral interpreter, establish a procedure requiring staff to document in the patient's medical record the time, name of the interpreter called and the reasons they were not available. If there was no response within a "reasonable amount of time," document what other services were made available to communicate effectively with the patient.			

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D. RESOURCES/SERVICES	Yes	No	Alternative Actions
Ensure contract with language line interpreting service.			
Develop and make available a consent form for an in-person or telephone interpreter in appropriate language.			
Ensure access to language line resources for use in emergency situations while awaiting the arrival of an interpreter			
Provide pictograph forms and flashcards (to be used in the event of emergencies and only as a last resort only)			
Consider forming a consortium of local hospitals to share resources and save time and money <ul style="list-style-type: none"> ✓ Maintain a “pool” of all available local interpreters – establish a language bank of interpreters ✓ Consider contracting with existing organizations to train and assess interpreters. Cost of training could be shared by all hospitals in the consortium. ✓ Consider sharing translated resources 			
Consider working with community based organizations and other stakeholders to inform LEP individuals of your programs and activities			
Consider Using a telephone voice mail menu in the most common languages encountered			
Consider including notices in local newspapers in languages other than English, when placing advertisements			
Consider airing notices on non-English language radio and television			
Consider creating a tool to collect data on patient satisfaction with interpreter/translation services			

Assessment Completed By: _____

Date: _____