

Service Area: Patient Relations / Experience	YALE NEW HAVEN HEALTH POLICY & PROCEDURES		
Title: YNHHS Language Services Policy			
Date Approved: 01/11/2018		Approved by: System Operating Committee	
Date Effective: 01/22/2018		Date Reviewed/Revised: NEW	
Distribution: MCN Policy Manager		System Policy Type (I or II): Type II	
Supersedes: BH Interpreter Policy GH Communication for Limited English Proficiency (LEP) Patients and Companions LMH + WH Interpreter Policy NEMG Interpreter Policy YNHH Interpreter Policy			

PURPOSE

The purpose of this policy is to ensure that the communication needs of our limited English proficiency (LEP) patients/companions are met in order to provide access to the most comprehensive health care services available and to enhance patient safety. Yale New Haven Health System (YNHHS) will provide interpretation services free of charge to LEP patients/companions who have indicated their preferred language to medical personnel for effective communication in the delivery, planning, instruction, and understanding of medical care. Patients/companions will not be turned away, rescheduled or not seen due to staff refusal to use available interpreter services.

This policy will provide guidance to YNHHS personnel/providers and:

- A. Define terms pertaining to services for LEP patients/companions who are in need of language assistance.
- B. Define the responsibilities of YNHHS personnel/providers in assuring that all LEP patients/companions have equal access to or an equal opportunity to benefit from YNHHS services and programs, regardless of their proficiency in English.
- C. Describe the role and requirements for interpreters for LEP patients/companions.
- D. Educate YNHHS personnel/providers regarding what constitutes satisfactory service under the law and identify prohibited practices.

YNHHS Language Services Policy

- E. Outline the established procedures to secure appropriate language assistance services.

APPLICABILITY

This policy applies to Yale New Haven Health System (YNHHS), and each of the affiliated entities including, but not limited to HSC and Grimes controlled directly or indirectly by YNHHS, including each affiliated hospital (Bridgeport Hospital, Greenwich Hospital, Yale-New Haven Hospital, Lawrence + Memorial Hospital, Westerly Hospital, and any other hospital that affiliates with YNHHS) and other providers (including but not limited to Northeast Medical Group) and each of their subsidiary entities.

POLICY

It is the policy of YNHHS to comply with the requirements of all State and Federal laws regarding the provision of language service assistance to patients and their companions.

DEFINITIONS

[See Appendix A](#)

YNHHS RESPONSIBILITIES

A. Service Under Federal Law and Prohibited Practice:

1. Federal law requires that places such as hospitals furnish auxiliary aids when necessary to ensure effective communication with patients and their companions. Auxiliary aids may include, but are not limited to, such services or devices as qualified interpreters, assistive listening devices with headsets, television captioning, TTY's, Big Button Braille Amplifier Phones, and videotext displays.
2. The use of non-qualified interpreters, such as a family member, friend, or anyone other than a certified interpreter is discouraged except in certain circumstances. The use of family or a friend as an interpreter may be a prohibited practice and raises concerns regarding the accuracy and potential for misrepresentation during the communication between the patient and the personnel/provider.

B. Assessment:

1. It is necessary for YNHHS personnel/providers in consultation with the patient/companion to make a determination of which auxiliary aids and/or services are necessary, including the timing, duration and frequency with which they shall be provided.
2. YNHHS personnel/providers will determine the patient's preferred language at the time of initial contact (admission, appointment scheduling) and will document the preference

YNHHS Language Services Policy

in EPIC. To identify the language, a language identification card and/or an over-the-phone (OTP) interpreter can be used (or for sign language, an American Sign Language (ASL) interpreter either in person (IP) or via video remote interpreting (VRI) in order to determine what language the patient prefers to use when discussing their healthcare. Every effort shall be made to anticipate the need for an interpreter so that patient care will not be delayed or compromised in any way.

3. The provision of appropriate auxiliary aides, services or interpreters will be evaluated throughout each patient's encounter.
4. Once the determination is made that a LEP patient/companion will benefit from auxiliary aids and/or services, YNHHS personnel/providers must advise patient/companion that all auxiliary aids or language services will be provided free of charge.
5. Documentation of all requests, and ongoing updates provided to patient/companion while waiting for interpreter to arrive must be made in the patient's medical record.

C. Proper Utilization of Staff:

1. Interpreters must be employed through YNHHS as a medical interpreter or provided by a contracted interpreter vendor.
2. The use of qualified trained medical interpreters is required to ensure that patients/companions have full access to information, according to the highest professional standards of medical interpretation. Medical interpreters follow an accepted professional code of ethics and the YNHHS Standards of Behaviors.
3. Bi-lingual staff can have everyday casual conversations with their patient. Certified bi-lingual staff can have medical conversations directly with their patient but cannot serve as an interpreter for YNHHS personnel/providers.
4. YNHHS personnel/providers who are not trained and/or approved as bi-lingual staff or assessed as being fluent and authorized to provide communication in language other than English will not be used as interpreters.
5. Outside vendors that provide trained qualified interpreters who, by extension operate under accepted standards as set forth by YNHHS, will be utilized by personnel/providers, either OTP, IP or VRI, according to the criteria outlined in this policy.
6. YNHHS personnel/providers will make every effort to use OTP or VRI interpreting services when IP interpreters are not available.

D. Use of family/friends to interpret:

1. Patients/companions will not be asked to provide their own interpreter or to bring someone bi-lingual with them. The patient will be advised that the use of a qualified medical interpreter is strongly recommended as such interpreters are fully trained, competent in medical terminology and are a neutral party. Qualified medical interpreters are offered free of charge.
2. YNHHS Personnel/providers may accept the use of a family member or friend as the interpreter at the request of the LEP patient, or at the request of a person who is authorized to make medical decisions for a patient in the event the patient is unable to make decisions about their own care. YNHHS personnel/providers will document in the medical record that the patient has declined the use of a qualified interpreter and opted to use family/friend as an interpreter.

YNHHS Language Services Policy

3. YNHHS personnel/providers are responsible for understanding all parties to the communication in the medical encounter. Therefore it is recommended that YNHHS personnel/providers request a qualified medical interpreter be present during an interpretation being provided by family/friends to ensure that the communication content is accurate and complete.
4. When possible, a qualified medical interpreter will be used to ascertain that it is the patient's wish not to use an YNHHS approved interpreter during their medical encounter.
5. In rare cases, when the care provider is unable to secure appropriate language interpretative services (uncommon dialects) and has exhausted available options, a family member or friend may be used. The care provider shall make reasonable efforts to ensure that the family member or friend is competent or appropriate to serve as an interpreter. Such efforts shall be documented in EPIC.
6. The family member or other designated person providing language support must be over the age of 18, except in the case of a medical emergency.

E. Standards for Interpreters:

1. The purpose of the presence of an interpreter is to make it possible for the LEP patient/companion and the personnel/provider to achieve the goals of the encounter. This is facilitated through the interpreter communicating directly with each party while at the same time ensuring quality care and patient safety. The medical interpreter must be familiar with and understand ways in which culturally based beliefs affect the interaction and provide an interface between patient/companion and personnel/provider. If an interpreter is needed, the languages suitable for optimal communication will be noted in the patient's record. Medical interpreters should not be used to observe/critique "bilingual" providers who want to practice their language skills.
2. Vendors will be informed of quality measures and provide data in accordance with the vendor agreement.

PROCEDURES

Click here to view the [Bridgeport Hospital Procedures](#)

Click here to view the [Greenwich Hospital Procedures](#)

Click here to view the [L + M Hospital and Westerly Hospital Procedures](#)

Click here to view the [Northeast Medical Group \(NEMG\) Procedures](#)

Click here to view the [Yale New Haven Hospital Procedures](#)

Click here to view [Appendix B: Tools for Interpretation](#) 

Bridgeport Hospital Procedures

- A. Process to Obtain an Interpreter: Qualified medical interpreters shall be accessed through video or telephone. Interpreters are available 24 hours/day 7 days a week.
1. Qualified medical interpreters (Spanish) are available by paging (203) 534-4652 during normal business hours (Monday – Friday, 8:00AM – 4:30PM)
 2. All BH main campus locations have access to both video and telephonic interpretation.
 3. Maintenance and replacement of interpreting phones is the responsibility of the individual unit or department through the Patient Relations office.

Greenwich Hospital Procedures

- A. Process to Obtain an Interpreter: Qualified medical interpreters shall be accessed through video or telephone. Interpreters are available 24 hours/day 7 days a week.
1. Qualified IP medical interpreter (Spanish) is available during normal business hours (Monday – Friday, 8:30AM – 4:30PM) and may be requested by contacting the Patient and Guest Relations Department.
 2. The clinician and/or staff person administering the medical treatment is responsible for documenting the method and name of interpreter if in-person, within the patient's medical record.
 3. Vital documents that are not available in a written translation shall be verbally translated to the patient. The provision of oral translation shall be documented, and documentation shall become part of the medical record.

B. Equipment

1. All hospital locations at the main campus have access to telephonic and video interpretation at all times.
2. All off-site locations have access to telephonic interpretation.
3. Every patient care area has access to an interpretation telephone and all areas of the hospital have direct access to interpretation services through extension: 7998. Any individual needing an interpreter may dial ext. 7998, hold the line while pre-programmed access codes are activated then, at the prompt, and speak the name of the language required.
4. Maintenance, replacement and acquisition of interpreting equipment are the responsibility of the Patient and Guest Relations department.

C. Written Translation

1. Requests for the written translation of a document should be forwarded to Patient and Guest Relations.
2. After review of the request, the department will determine if the translation will be provided in-house or referred to a vendor for translation.
3. The requester will be notified of the method of translation and expected turn-around time.
4. A completed translation will be obtained and forwarded to the requester.

YNHHS Language Services Policy

L + M Hospital and Westerly Hospital Procedures

A. Process to Obtain an IP Interpreter

1. Hospital telephone operators are responsible for arrangement of in-person interpreters on contact by the member of the care team (dial “0” to contact Operator from inside hospital); from outside the Hospital first dial (860) 442-0711.
2. Linguistica International provides qualified interpreter services at 1-866-908-5744; account number 01272.

B. Process for using VRI / Language Line

1. Use Language Line services by dialing 1-844-695-5387 or on iPad designated for language services (Stratus Bird Icon); account number 227056. Give department name requesting service. Add the non-English speaker to the line or place iPad where the patient/companion may view it. Language Line will conference in the interpreter or the interpreter will appear on the iPad screen. Brief the interpreter, summarize what you wish to accomplish and give any special instructions.
2. Linguistica International is a second option if language line does not offer the language or dialect. Use the phone number above in procedures: A (B).
3. If you would like to hear a recorded demonstration of over-the-phone interpretation call the demonstration line at 1-800-821-0301 or visit the website at <http://language.com>.

C. Written Translations

1. For written translations call Linguistica International (number above).
2. If translation of vital document is needed, submit document(s) for translation into frequently encountered languages to the Patient Relations department. Original documents being submitted for translation will be in the final, approved form with updated and accurate legal and medical information, L + M Healthcare will provide translation of written materials free of charge for LEP individuals.

D. Equipment

1. Central Supply is responsible for dispensing and cleaning auxiliary equipment.
2. Biomedical Engineering is responsible for problems with the use of equipment of auxiliary aids.

Northeast Medical Group (NEMG) Procedures

A. Process to Obtain an Interpreter: qualified medical interpreters shall be accessed through telephone or mobile device. Interpreters are available 24 hours/day, 7 days a week by the following process by telephone:

1. Contact SpectraCorp at 1-855-316-3983
2. Staff will hear “Welcome to SpectraCorp interpreting by phone”

YNHHS Language Services Policy

3. They should enter access code 203384
4. SpectraCorp will ask for:
 - Location where interpreter services are required
 - First and Last Name of the person making the request
 - Language Needed
5. When an interpreter is needed for a patient telephone call, the SpectraCorp request coordinator will place the call to the patient before the interpreter connects
6. Tips for making a call are above in YNHHS responsibilities (G).

B. Process to obtain an interpreter via mobile device (iPad designated for language services)

1. Select the hummingbird icon
2. Tap the language button you need.
3. Greet your interpreter and proceed with communication.

C. Qualified in person medical interpreters are available when it is determined by the physician or advanced practice clinician prior to the office visit that an in person interpreter is needed for an LEP patient. The office staff will contact the Patient Experience Coordinator to make necessary arrangements. It should be noted that reasons for an in person interpreter include but not limited to the following:

1. Critical or sensitive medical information needs to be relayed
2. Sexual assault
3. Fetal demise
4. Trauma
5. End of Life
6. Psychiatric consultation

D. Equipment

1. All NEMG locations have access to telephonic interpretation. Some locations have access to video interpretation via mobile device.
2. Maintenance and replacement of equipment is the responsibility of the individual practice through the Patient Experience department.

Yale New Haven Hospital Procedures

A. Documentation

1. YNHH personnel/providers identifying the need for an interpreter and/or using an interpreter to communicate with a patient/companion of support person is responsible to document that an interpreter was used, along with the interpreter's identification number for the encounter. The modality (IP, OTP, VRI, etc.) should also be documented.
2. YNHH staff interpreters will document in the patient's medical record following the completion of the interpretation. YNHH language services office will maintain records of interpreter requests made and results thereof.

YNHHS Language Services Policy

B. Process to Obtain an Interpreter

1. VIA EPIC: go to the tool bar, select “tools”, then language services.
2. VIA Clinical Workstations (SWS): select “1”, then language services
3. VIA Intranet: select YNHH, applications, then language services request
 - Interpreter IP Availability:
 - **Spanish: M-F 7:30AM – 11:00PM; Sat/Sun 8:00AM – 7:30PM** 
 - Arabic: M-F 9:00AM – 5:30PM
 - French, Italian, Haitian Creole, Portuguese: M & T 8:00AM – 7:30PM, Wed 8:00AM – 4:30PM, TH & F 8:00AM – 1:00PM
 - American Sign Language: M – F 8:00AM – 5:30PM (other times please call 11, option 4)
 - All other languages: Please make request at a minimum of 24 hours in advance of need via EPIC, SWS, or Intranet.
4. **To request VRI, call 111, option 5 which is the YNHH Service Response Center (Only available for inpatient units on the YSC and SRC). When reporting technical difficulties, please call the Helpdesk 688-4375. Please indicate it is an iPole.** 
5. To request an OTP interpreter for any language, available 24/7, you can use any YNHH phone. Dial 111, choose option 1 or 2. If you are off campus, dial 203-680-1111. If your unit has a dual handset phone you can use that. You can also access OTP interpreter by using mobile heartbeat and dialing 111.
6. **If approved as a bi-lingual staff by YNHH after taking a fluency assessment, these YNHH personnel/providers can communicate directly with their LEP patient/companions but never act in the role of an interpreter with third party involvement.**

C. Written Translations:

1. YNHH will assist department with securing written translations of patient education materials and vital documents. Numerous vital documents can be found on YNHH intranet under the proper tab and section. However, it is important to note that these materials should be provided for patients whose languages are spoken by 5% of the general population in the local area upon request.
2. Discharge instructions are provide in English and Spanish only. If they are not ready before the patient leaves, they may be mailed to the patient’s home and an interpretation should be completed orally at the time of discharge. Having discharge instructions translated does not preclude the use of an interpreter during discharge. The patient should always be provided with the English version.

D. Equipment Standards:

1. YNHHS inpatient units, treatment and procedural areas shall be responsible to maintain the telephone(s) for OTP interpreting, VRI devises and equipment such as speaker phones, and or other interpreting technology.
2. Department Managers are responsible for establishing a safe place to store the speaker phones, ALDs, and/or other AAC resources and for informing staff about the location, setup and storage of said equipment. They are also responsible to see that new hires are made aware of this protocol.

YNHHS Language Services Policy

REFERENCES

The Joint Commission RI.01.01.01, EP5; RI.01.01.03 EP2; PC02.01.21

Title VI Civil Rights Act of 1964

Title III of the Americans with Disabilities Act (ADA)

RELATED POLICIES

YNHHS Patient Complaint and Grievance Management Policy

YNHHS Patient Rights and Responsibilities Policy

YNHHS Nondiscrimination Patients/Visitors

YNHHS Communication Services for Persons who are Deaf or Hard of Hearing

Appendix A: Definitions

- A. **AAC** – Augmentative and Alternative Communication resources (picture boards, white boards, speech generating devices, etc.) that may be required for patients/companions who may have sensory or communication impairment.
- B. **ALD** – Assistive Listening Device) amplified listeners, big button braille phones, etc.) to aid deaf and/or hard of hearing patients/companions to communicate.
- C. **Amplified Listener** – Small amplification devices that are used primarily with hard of hearing patients/companions to increase the volume of the personnel/providers voice.
- D. **Appropriate Services** – Services necessary for effective communication between DHOH or LEP patients/companions and personnel/providers such as ASL interpreters, Certified Medical Interpreters, CDIs, VRI or OTP devices.
- E. **Approved bi-lingual personnel/providers** – YNHHS personnel/providers that have been assessed for fluency and have passed with a high level of competence. They are able to accurately and impartially deploy specialized medical vocabulary in a direct care setting, not acting as an interpreter. These persons have language capabilities but have not been trained for interpreting.
- F. **Big Button Braille Phone** – This phone has large keys for those with low vision. It also has an amplification dial to increase the volume for hard of hearing patients. In addition, the dial pad has the numbers embossed in Braille for the blind.
- G. **CDI – Certified Deaf Interpreter** – This interpreter works in the team with a hearing interpreter and is used in the situations where the deaf or hard of hearing person may not use standard ASL.
- H. **Certified ASL Interpreter** – A hearing interpreter who has been certified through Registry of Interpreters for the Deaf (RID) and is registered with the State of Connecticut. This interpreter is able to interpret competently, accurately, and impartially, both receptively and expressively, using any specialized terminology necessary for effective communication in a healthcare setting.
- I. **Certified Medical Interpreter** – A spoken language interpreter that has been trained, and has passed a certification test. This interpreter is able to interpret competently, accurately, and impartially, both receptively and expressively, using any specialized terminology necessary for effective communication in a healthcare setting.
- J. **Closed-Captioning** – This subtitle option is offered on most in-house televisions including patient rooms and should be set for televisions in waiting room areas.
- K. **DHOH** – Deaf and Hard of Hearing
- L. **Dual Handset Phones** – Analog line phones that have two receivers which enable the personnel/provider, the patient/companion and the interpreter to be on the line at the same time.

YNHHS Language Services Policy

- M. **Language Identification Notice** – Notice that explains our services to the patient/companion in their own languages.
- N. **ODI** – On Demand Interpreting
- O. **ODI Cart** – Large touchscreen mounted on a heavy duty pole for patients/companions with visual impairments in addition to language needs. (*YNHH only – stored in PEDI ED).
- P. **Patient LEP Companion** – A parent or other adult person formally designated by the patient whose command of the English language is limited in that he/she cannot understand English, (i.e. English-speaking child patient/LEP parent or legal guardian, hearing patient/deaf adult family member or other LEP companions). When possible, confirm with the patient that information can be shared with accompanying companion(s).
- Q. **Preferred Language** – Any language that an individual (patient/companion) identifies as the language that he/she prefers to use to communicate effectively.
- R. **Qualified Interpreter** – This term refers to the statutory right of LEP patients to have an interpreter who have been assessed, trained and/or certified and adhered to all professional ethics as set forth by the section of this policy on the role and standards for interpreters.
- S. **Regularly Encountered Language** – Any language spoken by a significant number or 5% of the general in the local area eligible to be served or likely to be affected by YNHHS programs or services based on demographic information.
- T. **Speakerphone** – Suitable for use with OTP interpreting for LEP users of spoken language and their personnel/providers.
- U. **Simultaneous Interpreting Equipment** – This equipment allows an interpreter to speak into a device that is connected to multiple LEP listeners and is used primarily for group discussions and education.
- V. **TTY** – Tele-typewriters by which some DHOH patients/companions make phone calls through a digital typewriter device using English.
- W. **Unassessed (Untrained) Bi-lingual Personnel/Providers** – Persons with spoken language capabilities who have not been assessed for language competencies. These individuals may not communicate ad hoc.
- X. **Video Phone** – This phone is used by DHOH patients/companions to make personal calls through the use of Video Relay Services (VRS).
- Y. **VRI Device** – Mobil device that uses video to provide augmentative services when IP interpreting is not available or necessary.
- Z. **YNHHS Personnel/Providers** – All employees and independent contractors with patient contacts, including but without limitation: nurses, medical support staff, physicians, social workers, technicians, admitting and reception staff, therapists, volunteers, staff interpreters, and approved outsourced interpreters, etc.

Appendix B: Tools for Interpretation

A. Tools for Interpretation Help via (OTP, VRI, etc.):

1. Give the interpreter specific questions to relay; group your thoughts or questions to help the conversation flow.
2. Interpreters identify themselves by first name and number only.
3. Expect interpreted comments to run a bit longer than English phrases, interpreters convey meaning-for-meaning, not word for word. Concepts familiar to us often require explanation or elaboration in other languages and cultures.
4. If you experience problems with the sound quality and the call agent is still on the line, ask him or her to re-dial the interpreter. If the call agent has left the line, call back, explain the problem and ask them to reconnect you to the agent to stay on the line to check for sound quality.
5. Always speak clearly and directly to the patient.
6. Be culturally aware of eye contact, space and touching.
7. If multiple people are in the room, speak one at a time.
8. Short sentences are easiest to interpret.
9. Encourage the interpreter to clarify terms with you, if necessary.