

**INDEPENDENT CARE HEALTH PLAN
POLICY/PROCEDURE**

Department: Compliance	Policy: Limited English Proficiency Translation and Interpreter Services
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POLICY: Independent Care Health Plan (*iCare*) understands and applies the guidelines and requirements of Limited English Proficiency (LEP) and special needs as outlined in the Civil Rights Compliance Plan required by the State of Wisconsin Department of Workforce Development, the Department of Health Services and Centers for Medicare and Medicaid Services. This policy outlines the steps *iCare* enforces to ensure current and prospective beneficiaries with Limited English Proficiency or who require an interpreter or other type of assistance with special communication needs are appropriately served. The Member Advocate/Member Rights Specialist serves as the LEP Coordinator.

Individuals with special communication needs are defined as those with:

- Hearing disabilities or deafness
- Sight or vision disabilities
- Low literacy or reading level
- Developmental or learning disabilities
- Non-English speaking
- Diverse cultural and ethnic backgrounds

PROCESS:

- 1) New *iCare* employees receive training on the LEP policy. Current employees receive refresher LEP training every three (3) years. All LEP training is done through the *iCare* Learning Portal via Relias.
- 2) At *iCare*, the Equal Opportunity and LEP policy statement is permanently posted on the website and in the reception area where both current and prospective beneficiaries and applicants may review it.
- 3) The Customer Service call center menu messages and after hours answering service provide information on TTY relay services or transfers calls to multilingual staff as appropriate.
- 4) Staff at *iCare*, or under contract, are available to assist members in their native languages and explain how services can be accessed, including translation and interpreter services.
- 5) “Interpretation” means facilitating oral dialogue or sign-language communication between parties using different languages. “Translation” means the form of communication between two different languages in a written format. *iCare* contracts with third party entities to provide interpretation and/or translation services when appropriate. *iCare* requires that all such vendors warrant and represent that any and all individuals providing services under the interpretation and/or translation agreement have, and will maintain for the duration of the agreement, a certification of proficiency for the language in which they are providing interpretation or translation services. Certification of the written and/or oral examination must be granted from a nationally recognized accrediting body such as the National

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speaking members. Upon request, iCare staff shall review said list to see what documents meet the member's needs.

- 10) Independent Care provides informational materials, postings, and audio-visual materials in languages understood by customers and in formats that are understandable to persons with visual and/or hearing impairments. If electronic information is used exclusively, text to voice and voice to text software is provided for persons with sensory or physical disabilities as requested.
- 11) Information referencing the discrimination complaint resolution procedure at iCare is publicly posted in the Member Handbook in languages understood by customers and is in a format(s) accessible to persons with visual or hearing impairments.
- 12) The LEP Coordinator is responsible for providing, monitoring and evaluating language access sensitivity and training needs for providers and staff. When the LEP Coordinator identifies an employee or area in need of increased education, sensitivity or training, this information is reported to the Compliance Committee where a strategy for corrective action is developed and implemented.
- 13) The Credentialing Department evaluates the credentials of the oral interpreter and written translator vendors and providers prior to contracting and every three years thereafter to ensure the quality of services provided is established and maintained.
- 14) The records and documentation of iCare's LEP service delivery and employment practices are made available to State and Federal Government staff upon request.

Responsible Department: Compliance

Reviewing Department: Compliance

References: 29 CFR Part 37.35 and 45 CFR Part 80.3 and 45 CFR §§ 92.201 and 92.202; Civil Rights Act of 1964 Title VI and VII; Medicare Marketing Guidelines 30.5, 30.5.1, and 30.6; Executive Order 13166

Recommended Distribution: All Staff via iCare intranet site

Approval:

 <hr/> Thomas H. Lutzow, President/CEO	 <hr/> Date
 <hr/> Jill Fisher, Director of Compliance	 <hr/> Date

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