

## 1.7 LIMITED ENGLISH PROFICIENT PERSONS

**Policy:** Sub-recipients must develop and implement a plan to ensure meaningful access to services by Limited English Proficient (LEP) persons. Title X clinics must have written policies that are consistent with the HHS Office for Civil Rights policy document, *Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons* (August 4, 2003) (*HHS Grants Policy Statement 2007, II-23*) and Section 1557 of the Affordable Care Act.

A Limited English Proficient (LEP) person is an individual who does not speak English as his/her primary language and who has a limited ability to read, write, speak, or understand English. Such a person may be eligible to receive language assistance with respect to services or benefits.

### Procedure:

1. Each clinic must post information about the availability of translation services in the clinic in the top 15 languages spoken in your area. This may be done through the language ID guide, poster, and desktop display from the language line supported by the FPP. This must be posted in the waiting room and be available in the exam rooms.
2. Clinics must post a notice of nondiscrimination informing clients about their rights to accessible services and to communication assistance. Here is a sample of [Translated Resources for Covered Entities](http://www.hhs.gov/civil-rights/for-individuals/section-1557/translated-resources/index.html) (<http://www.hhs.gov/civil-rights/for-individuals/section-1557/translated-resources/index.html>).
3. Each clinic must put a tagline on the clinic's website and intake form highlighting the availability of translation services:  
Example, "If you need language assistance services free of charge, please talk to the front desk staff for assistance ..... or call the clinic at 406-XXX-XXXX." Here is a sample of [Translated taglines](http://www.hhs.gov/civil-rights/for-individuals/section-1557/translated-taglines) (<http://www.hhs.gov/civil-rights/for-individuals/section-1557/translated-taglines>).
4. Each clinic must have written documentation that a client need for language assistance has been assessed.
5. The Family Planning Program (FPP) will subscribe to the Language Line Services (LLS) and will pay the monthly fee.
6. All Title X family planning clinics will have access to the FPP LLS account.
7. Each clinic will be assigned a unique two-digit Personal Identification Number that may be found in the MT TX FP Administrative Manual, Sample Policy 8.2 *Sample Limited English Proficiency Policy*. Satellites will use the clinic Personal Identification Number (PIN) of their respective sub-recipient clinic.
8. How to use the LLS:
  - a. A client requiring LEP services is identified and the language is determined.
  - b. A health care provider will call the LLS phone number. 1-866-874-3972
  - c. Then enter the FPP account number (541209).
  - d. Then select the language needed.
  - e. Then enter the unique clinic PIN followed by the pound sign (#). This pin is a two-digit number and if it is not correct the call will not be granted. Please make sure that you have your Clinics ID available.
  - f. The FPP will receive the invoice for the cost of the call. The clinic will be billed by FPP and will be responsible to repay the cost of the service to FPP within 30 days.
9. LLS also offers document translation services. Clinics that would like to access this service will be responsible for any fees associated with document translation.

10. For questions on the LLS, please contact:  
FPP Financial Specialist  
406-444-3609

**Note:** Although some LEP persons may feel more comfortable when a trusted family member or friend acts as an interpreter, this is strongly discouraged. FPP strongly recommends using the LLS for accommodating the interpreting needs of LEP clients. Clinics should make the LEP person aware that he or she has the option of having an interpreter provided at no cost. The use of the LLS ensures the client of competent, appropriate, and confidential interpretation without the possible conflict of interest and confidentiality breach that may arise when using friends or family members as interpreters.

**Additional Information:** For more information regarding LLS, please visit the [Language Line website](https://www.language.com/) (<https://www.language.com/>). LLS offers interpretation services in over 170 languages. Additional information and resources may be found at the U.S. DHHS [Limited English Proficiency](http://www.lep.gov) ([www.lep.gov](http://www.lep.gov)).