

**Cuyahoga County Division of Children and Family Services
(CCDCFS)
Policy Statement**

Policy Chapter: Client Rights
Policy Number: 7.06.04
Policy Name: Provisions for Clients with Limited English Proficiency (LEP)

Original Effective Date: 08/01/2015
Revision Date(s): 09/01/2018
Current Revision Date: 09/01/2018
Approved By: Cynthia G. Weiskittel

PURPOSE: To ensure compliance with requirements of the Ohio Revised Code (ORC), Ohio Administrative Code (OAC) and Ohio Department of Job and Family Services (ODJFS) policies regarding county agency responsibilities to ensure services are delivered without regard to a client's English language proficiency and to provide a process for assisting clients with Limited English Proficiency (LEP) obtain information about and actual services.

SCOPE: This policy applies to all employees, clients and services of the Cuyahoga County Division of Children and Family Services (CCDCFS).

POLICY

DCFS provides meaningful access to program information, benefits and services to all clients, regardless of their English language proficiency. DCFS makes free language services available to applicants/recipients of benefits/services that result in accurate and effective communication that does not result in any undue delay or denial of benefits/services to which the LEP applicant/recipient is eligible.

DCFS makes bi-lingual staff available to assist in identifying clients who need professional interpreter and translator services. DCFS participates in the County Health and Human Services process for contracting interpreter and translator services to ensure access to services.

DCFS ensures that employees and clients are aware of these services and how to access them.

PROCEDURES

I. General Procedures

- A. DCFS provides translation and interpretation services free of charge to any client who requires them in order to be properly served by the agency.

- B. DCFS uses bi-lingual staff in emergency situations or at initial contact with walk-in or telephone clients who do not speak English to determine service needs and schedule services with contracted interpreters or to assist in arranging for contracted interpreters by telephone to assist with services. Bi-lingual staff used in this capacity are trained and tested by a professional external interpreter services vendor and must meet minimum prescribed standards.
- C. DCFS does not require, suggest or encourage LEP individuals or families to use friends, family members or minor children as interpreters. If an LEP individual or family insists that a friend or family member serve as an interpreter, DCFS will inform the client that the family member may stay but will not be able to serve as the interpreter. Only on rare occasions when there is no other strategy, DCFS will, on a case by case basis, consider factors such as: competence of the family or friend used as the interpreter; the appropriateness of the use in light of the circumstances and the ability to provide quality and accurate information, especially if the interview could result in a negative effect on the individual or family's eligibility for services; potential or actual conflicts of interest; and confidentiality of the information being interpreted to determine whether DCFS should provide its own independent interpreter for itself. In no case does DCFS allow minor children to act as an interpreter for an LEP individual or family.

II. Procedures for Working with LEP Clients

- A. Serving LEP Clients in person at the Welcome Center (front desk)
 - 1. When an LEP client is at the agency reception area, the clerical specialist uses the language chart to determine the client's primary language. If the language is Spanish, the clerical specialist contacts a Spanish speaking bi-lingual employee to determine the client's needs and schedule appropriate follow up services with a bi-lingual employee or with an objective contract interpreter present.
 - 2. If the LEP client's primary language is not Spanish or a bi-lingual employee is not available, the clerical specialist contacts US Together to provide telephone interpretation to determine the client's needs and schedules appropriate follow-up services with an objective contract interpreter present.
- B. Serving LEP Clients on the telephone.
 - 1. When a Spanish speaking LEP client contacts DCFS by telephone, the clerical specialist adds a Spanish speaking bi-lingual employee to the call to determine the client's needs and schedule appropriate follow up services with a bi-lingual employee or with an objective contract interpreter present.

2. When a non-Spanish speaking LEP client contacts DCFS by telephone, or a bi-lingual employee is not available, the clerical specialist adds the telephone interpreter to the line to determine the client's needs and schedule appropriate follow up services with an objective contract interpreter present.
3. When a Spanish speaking LEP client contacts the DCFS emergency **Hotline** by telephone, the worker adds a Spanish speaking bi-lingual employee to the call to determine the client's needs and schedule appropriate follow up services with a bi-lingual employee or with an objective contract interpreter present.
4. When a non-Spanish speaking LEP client contacts the DCFS emergency **Hotline** by telephone, the clerical specialist adds the telephone interpreter to the line to determine the client's needs and schedule appropriate follow up services with an objective contract interpreter present.

C. Serving LEP Clients through meetings that can be scheduled in advance.

1. When working with an open case of a Spanish speaking LEP family, all contact is made using a bi-lingual employee or an objective contract interpreter. All meetings are scheduled in advance with an objective contract interpreter present.
2. When working with an open case of a non-Spanish speaking LEP family, all contact is made using an objective contract interpreter. All meetings are scheduled in advance with an objective contract interpreter present.

D. Serving LEP Clients in the field/out of the office.

1. When meeting with an LEP individual or family at his/her home an objective contract interpreter is present.
2. When meeting with an individual or family at his/her home and the individual/family is identified as LEP, the worker contacts the contract interpreter service by telephone to determine the client's needs and schedule appropriate follow up services with an objective contract interpreter present.

III. Translation Services

A. Agency Forms & Case Specific Documents

1. When working with an LEP individual/family, the worker determines what agency forms are required in the clients' language and checks to see if they are already available from ODJFS. If they are not available from ODJFS, the worker fills out the Translation Services Request Form and forwards it according to current instructions.

2. When working with an LEP individual/family, the worker determines what specific letters and/or other documents are required in the clients' language and fills out and submits the Translation Services Request Form according to current instructions.

IV. Documentation

- A. The Worker of Record will document all LEP as such with their primary language spoken in SACWIS.

V. Accessibility

- A. The Civil Rights Coordinator files a bi-annual LEP Plan signed by the Director with ODJFS outlining policies, procedures, current vendors and bi-lingual employees.
- B. The Cuyahoga County Department of Health and Human Services procures a contract for all County HHS agencies for interpretation and translation services available to employees and LEP clients capable of meeting each divisions' service needs. The contract includes regular training for staff on how and when to access interpreter and translator services. The contract also includes training and testing for competency of bi-lingual employees.
- C. The Cuyahoga County Department of Health and Human Services Division of Professional Development and Learning and/or the Civil Rights Coordinator provides annual Civil Rights, LEP and ADA training to all employees in the agency. CCDCFS includes LEP training in its new worker training curriculum. This training is developed with assistance from the Civil Rights Coordinator and materials provided by ODJFS Bureau of Civil Rights.
- D. The Civil Rights Coordinator maintains current referral procedures outlining how to access translation and interpretation services. The procedures are distributed to employees and posted on the agency website with corresponding referral forms.

SEE ALSO:

- Contract for Interpretation and Translation Services
- List of Bi-Lingual Employees
- Procedures for Accessing Interpretation and Translation Services

Cuyahoga County Division of Children and Family Services

List of Current of LEP Contacts

(8/1/2018)

CCDCFS Civil Rights Coordinator
Steve Rusnak 216-881-4028 stephen.rusnak@jfs.ohio.gov

CCDCFS LEP Coordinator
Steve Rusnak 216-881-4028 stephen.rusnak@jfs.ohio.gov

CCDCFS ADA Coordinator
Daniel Basta 216-881-5539 daniel.basta@jfs.ohio.gov

LEP Issues & Questions
Christian Tobin CJFS 216-987-7922 christian.tobin@jfs.ohio.gov

Interpretation Services – (*Foreign language and American Sign*)
US Together clevelandinterpreters@ustogether.us
advance scheduling 877-581-4350
emergency phone service 855-774-5849
(*must fill out request form prior to scheduled interpretation or following emergency interpretation*)

Translation Services
US Together
(*must fill out request form prior to translation services and send to Christian Tobin*)

Christian Tobin CJFS 216-987-7922 christian.tobin@jfs.ohio.gov

Braille Translation of Forms & Documents
Cleveland Hearing and Speech Center
(*must fill out request form prior to translation services and send to Christian Tobin*)

Christian Tobin CJFS 216-987-7922 christian.tobin@jfs.ohio.gov



Cuyahoga County Division of Children and Family Services

Quick Guide to Accessing Interpreter and Translator Services (May 2018)

To ensure equal access to our services under Title VI of the Civil Rights Act, DCFS provides free interpretation and translation services for individuals with Limited English Proficiency. DO NOT use a family member, friend or any software, electronic application, etc. as an interpreter.

Interpreter and translator services are available for interaction with any client who has Limited English Proficiency (LEP). Cuyahoga County HHS has a contract with a professional vendor, US Together for services. Services include interpretation for clients who do not speak English well enough to communicate with us clearly during DCFS interaction and translation for documents into another language. US Together has access to interpreters who can assist us in over 200 languages and American Sign Language. For family meetings and other scheduled appointments, the request should be made in advance to have an interpreter in person using the Interpreter Services Request Form. To schedule an interpreter in advance, call **1-877-581-4350**.

For emergency services, interpreters are available by telephone by calling **1-855-774-5849**. If you have someone on the telephone or at the welcome center who speaks Spanish, you may try and contact one of the DCFS bi-lingual employees to address the immediate situation and see that an interpreter is scheduled for future contact. Before requesting that a form be translated into another language, make sure it is not already available from ODJFS.

There is a request form for each service as well as a complaint form if for any reason the services are not performed as expected. All three forms are available on-line on our agency intranet site under forms. Questions regarding interpretation services can be directed to Steve Rusnak at 881-4028 or Stephen.Rusnak@jfs.ohio.gov or Christian Tobin at Cuyahoga County Job and Family Services at 987-7922 or Christian.Tobin@jfs.ohio.gov

SERVICE	SITUATION	VENDOR	CONTACT	FORM
Spanish Language Interpreter	Client on phone or Client at welcome center	Spanish-DCFS Interpreter	See list	No
Foreign Language Interpreter	Client on phone or Client at welcome center	US Together	1-855-774-5849 clevelandinterpreters@ustogether.us	Yes- Email after
Foreign Language Interpreter	Less than 24 hours notice	US Together	1-855-774-5849 clevelandinterpreters@ustogether.us	Yes- Email after
Foreign Language Interpreter	Schedule Interpreter in advance	US Together	1-877-581-4350 e-mail form to: clevelandinterpreters@ustogether.us	Yes- before
Sign Language Interpreter	Schedule sign interpreter	US Together	231-0787 M-F 8:30 – 5:00 436-0509 after hours/weekends	Yes
Foreign Language or Braille Translation	Document needs translation	US Together – Foreign Language or Cleveland Sight Center— Braille	e-mail form and documents to christian.tobin@jfs.ohio.gov	Translation Request Form and document
No Show or Cancellation	Client, interpreter or staff cancels/doesn't show for appointment	US Together	Call US Together @ 1-877-581-4350 Fax form to 987-7090	See bottom line of form

Please don't forget to list the primary language of your client/family in SACWIS on the person profile demographics tab part 2 for all clients.



DCFS Bi-Lingual Employees

(as of 6/30/2018)

TELEPHONE	EMPLOYEE	LANGUAGE	LOCATION	E-MAIL
635-3897	Jackelyn Caskey	Spanish	Jane Edna Hunter	Jackelyn.Caskey@jfs.ohio.gov
881-4946	Ana Faroniya	Spanish	Jane Edna Hunter	Ana.Faroniya@jfs.ohio.gov
881-3080	Marilyn Medina	Spanish	Jane Edna Hunter	Marilyn.Medina@jfs.ohio.gov
881-4578	Maria Santana	Spanish	Jane Edna Hunter	Maria.Santana@jfs.ohio.gov
881-7833	Geraldo Quinones	Spanish	Hotline Jane Edna Hunter	Geraldo.Quinones@jfs.ohio.gov
485-4923	Veronica Vazquez	Spanish	Old Brooklyn	Veronica.Vazquez@jfs.ohio.gov

Foreign Language Interpreter

To schedule during normal business hours or in advance 1-877-581-4350

Immediate emergency during normal business hours 1-855-744-5849

Immediate emergency after hours/weekends 1-855-744-5849

Sign Language Interpreter

To schedule during normal business hours or in advance 1-877-581-4350

Immediate emergency during normal hours 1-877-581-4350

Immediate emergency after hours/weekends 1-877-581-4350

Translate critical document into foreign language 1-877-581-4350

Translate critical document into Braille 1-216-987-7922