

# HARRIS HEALTH SYSTEM

## POLICY AND REGULATIONS MANUAL

Policy No: 4385

Page Number: 1 of 7

Effective Date: 07/26/07

Board Motion No: 07.7-399

Last Review Date: 08/11/2020

Due For Review: 08/11/2023

**TITLE: INTERPRETATION AND TRANSLATION SERVICES**

**PURPOSE:** To establish guidelines for providing interpretation and translation services to patients and their representatives so that patients and their representatives receive information in a manner that meets the patient's or the patient's representative's communication needs.

**POLICY STATEMENT:**

Harris Health System (Harris Health) is committed to providing patients and/or their representatives who have limited English proficiency or a hearing impairment with qualified interpreters or, translators, or using qualified bilingual workforce members when communicating with patients and/or their representatives to enable patients and/or their representatives receive information in a manner that meets their needs.

**POLICY ELABORATIONS:**

**I. DEFINITIONS:**

- A. **INTERPRETATION:** The facilitation of **oral** and sign language communication, either simultaneously or consecutively, between two or more speakers who do not speak or sign the same source language.
- B. **INDIVIDUALS WITH LIMITED ENGLISH PROFICIENCY:** Individuals who do not speak English as their primary language, and who have a limited ability to read, speak, write, or understand English.
- C. **QUALIFIED INTERPRETER:** An interpreter who is able to interpret effectively, accurately, and impartially both receptively and expressively and who is able to use any necessary specialized vocabulary. Qualified Interpreters are Harris Health staff who have met competency requirements of converting information from one spoken language or sign language into another spoken language or sign language through language proficiency assessment and have an interpreter symbol on their name badge.

- D. **QUALIFIED BILINGUAL WORKFORCE MEMBER:** A workforce member or Medical Staff member permitted to speak with patients and/or their representatives regarding the patient's care in a language other than English. This qualification **does not permit** the workforce member to act as a Qualified Interpreter or Qualified Translator. Qualified Bilingual Workforce Members must have the bilingual frame around their picture on their name badge.
- E. **QUALIFIED TRANSLATOR:** Harris Health staff members who have met the competency requirements of to convert information from one written language into another written language based on a language proficiency assessment and who have an interpreter symbol on their name badge. All Qualified Translators shall also be Qualified Interpreters.
- F. **TRANSLATION:** The act of changing a **written** communication from one language to another language.

## II. GENERAL PROVISIONS:

- A. Harris Health will advise patients and their representatives of the availability of Interpretation and Translation services in the Inpatient Information Guide and by Harris Health signage.
- B. Harris Health Workforce Members must use Qualified Interpreters when speaking with patients who do not speak English.
- C. In order to speak any language other than English directly to patients, Harris Health Workforce Members or Medical Staff members must be designated as a Qualified Bilingual/Multilingual Workforce member. Additionally, Qualified Bilingual/Multilingual Workforce members may not interpret for other Workforce Members and must use Qualified Interpreters. (See Harris Health System Policy and Procedures 3.52 Non-Discrimination in Access to Services, Programs, and Facilities).
- D. Interpretation services are available twenty-four (24) hours a day, seven (7) days a week.

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## POLICY AND REGULATIONS MANUAL

Policy No: 4385

Page Number: 3 of 7

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- E. The Language Access Services Department will translate or coordinate the translation of information and materials including but not limited to patient education materials approved by the Harris Health Patient Education Department and Forms Committee.
- F. All Qualified Interpreters must demonstrate competency in at least one (1) language other than English and wear a Harris Health-issued badge that bears the international interpreter symbol and the language he or she is qualified to interpret.
- G. Harris Health will maintain documentation of employee's competency in his or her respective language in the employee's file.

### III. PROCEDURE:

See Appendix A

### REFERENCES/BIBLIOGRAPHY:

28 C.F.R. § 35.104, American Disabilities Act.

45 C.F.R § 92

Bureau of Labor Statistics, U.S. Department of Labor, Occupational Outlook Handbook, 2014-15 Edition, Interpreters and Translators, on the Internet at

<http://www.bls.gov/ooh/media-and-communication/interpreters-and-translators.htm>.

U.S. Department of Health & Human Services Office for Civil Rights at

<http://www.hhs.gov/ocr/civilrights/resources/specialtopics/lep/>.

Harris Health System Policy and Procedures 3.52 Non-Discrimination in Access to Programs, Treatment, and Facilities

# HARRIS HEALTH SYSTEM

## POLICY AND REGULATIONS MANUAL

Policy No: 4385  
Page Number: 4 of 7

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### OFFICE OF PRIMARY RESPONSIBILITY:

Harris Health System Ambulatory Care Services

### REVIEW/REVISION HISTORY:

Effective Date	Version# (If Applicable)	Review or Revision Date (Indicate Reviewed or Revised)	Reviewed or Approved by: (If Board of Managers Approved, include Board Motion#)
06/2000	1.0		Medical Board
		Reviewed 06/2006	HCHD Policy & Procedure Committee
	2.0	Revised 06/20/2007	Director of Interpretation Services
		Reviewed 07/03/2007	HCHD Policy Review Committee
07/26/2007			HCHD Board of Managers (No. 07.7-399)
	3.0	Revised 04/01/2008	
		Reviewed 02/02/2010	HCHD Policy Review Committee
	4.0	Revised 07/13/2010	HCHD Operations Policy Committee
	5.0	Revised 04/12/2011	Director of Patient Customer Relations
		Approved 05/10/2011	Operations Policy Committee
	6.0	Revised/Approved 07/07/2014	Operations Policy Committee
	7.0	Revised/Approved 08/11/2015	Operations Policy Committee
	8.0	Revised/Approved 08/11/2020	Structure and Organizational Standards Committee

### APPENDIX A PROCEDURES

#### A. Interpretation Services:

- When a patient requests an interpreter, when the patient’s medical record indicates that the patient’s preferred language is not English, or when there is any other evidence presented that indicates the patient or his or her representative is an Individual with Limited English Proficiency, Staff **must** attempt to locate a Qualified Interpreter in the hospital or clinic area where needed. If a Qualified Interpreter is not available in the hospital or clinic area, staff must utilize the dual handset/speaker phones, cordless, or iPad devices to access interpreters over the phone.
- If an in-person Qualified Interpreter is needed Harris Health System will solicit as follows:

Resource	Services Areas Supported	Languages Supported	Hours of Operation	Request for Interpretation Coordinated By :
Language Access Services (LAS) - Call Center	All service areas	Spanish, Vietnamese	M-F, 7a-6p	Automated Call Distribution
Ben Taub Pavilion, In-person Interpreters	Ben Taub (Hospital and Clinics)	Spanish	24x7	Direct Requests
LBJ Pavilion, In-person Interpreters	LBJ (Hospital and Clinics)	Spanish	24x7	LBJ Dispatch
Vendor	All service areas	1. All Languages 2. Video Remote for Sign Language 3. Currently, iPad support	24x7	Automated Call Distribution
Vendor	All service areas	In-person Sign Language	As Scheduled	Language Access
Vendor	All service areas	In-person Spanish and Other Languages	As Scheduled	Language Access Supervisors

- Interpretations provided or arranged by Harris Health’s Language Access Services Department or Harris Health’s Interpretation services vendor must be documented in the patient’s medical record at the time that the services are rendered.
- Only Qualified Interpreters and Qualified Translators will **interpret** or **translate** on behalf of Individuals with Limited English Proficiency or hearing impairments applying for or receiving services at Harris Health.
- Qualified Bilingual/Multilingual Workforce Members may **speak directly** to the non-English speaking patient in the language they are qualified to speak without the use of a Qualified Interpreter, **but may not** interpret for other Workforce Members.

6. Individuals with Limited English Proficiency or hearing impairments may request that a friend or family member be present and assist in understanding the information communicated through the Qualified Interpreter or Qualified Translator.
7. If a patient or a patient's representative refuses Interpretation or Translation services, the patient's care team must ask the patient or the patient's representative at least twice whether the individual would like to utilize Harris Health Interpretation or Translation services or have any documents related to the individual's care translated. The patient's care team must document in the patient's electronic medical record the discussion when a patient refuses Interpretation or Translation services.
8. **Sign Language Interpretation Services.**
  - a. Harris Health will arrange for sign language interpreters and provides access to services for patients and/or patient representatives who are deaf, hard of hearing, or speech-impaired and who prefer to communicate via a sign language interpreter.
  - b. Sign language interpretation services are available 24 hours a day, 7 days a week via video remote interpretation devices throughout Harris Health. For in person sign language interpretation requests, the following must be submitted as soon as possible after receipt of the request via email to Interpretation Services email box.
    - i. Name of the requestor and the date of the request;
    - ii. Name of the patient and the patient's medical record number;
    - iii. Department, location, and telephone number where service is to be provided;
    - iv. Date of the service, the start time, and the anticipated length of time for the service; and
    - v. Reason for the service and other necessary information that may be requested.

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Policy No: 4385

Page Number: 7 of 7

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### B. Translation Services

1. Requests for translation, along with the materials requiring translation, must be sent via e-mail to the Interpretation Services email box – [InterpretationServices@HarrisHealth.org](mailto:InterpretationServices@HarrisHealth.org).
2. Faxed copies of documents containing Protected Health Information and patient complaints will be accepted.
3. Patient education and marketing materials will be translated within two (2) weeks. Documents containing Protected Health Information, physician instructions, and urgent requests by medical staff will be translated as soon as possible.
4. Copyrighted material will not be translated unless written permission from the author is submitted to Interpretation Services email box.
5. Costs associated with Translation of approved documents may be charged directly to the requesting department.
6. Translated documents will be sent to the requestor for appropriate disposition.