

**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: 12/01/2019
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 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 undue delay or denial of benefits/services to which the LEP applicant/recipient is eligible.

DCFS ensures that employees and clients are aware of these services and how to access them through training, policy and posted signage.

PROCEDURES

I. General Accessibility

- A. The Civil Rights Coordinator files a bi-annual LEP Plan signed by the Director which includes ODJFS outline policies, procedures, current vendors and bi-lingual employees and languages most frequently encountered.
- B. The Cuyahoga County Department of Health and Human Services (HHS) procures a contract for all County HHS agencies for interpreter and translator 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 Learning and Professional Development and/or the Civil Rights Coordinator provide regular 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.

II. General Procedures

- A. DCFS provides timely translation and interpretation services free of charge to any client who requires them, to ensure timely and appropriate services.
- 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. A list of current bi-lingual employees is available to all employees via DCFS' intranet website's, Frequently Asked Questions (FAQ) tab.
- 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 informs the client that the family member may stay but will not be able to serve as the interpreter. On rare occasions when there is not a bi-lingual employee or contract interpreter available and, on a case by case basis, DCFS considers 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. In no case does DCFS allow minor children to act as an interpreter for an LEP individual or family.

III. Procedures for Accessing Interpreter Services

A. Foreign Language and American Sign Language interpreters are available in person for pre-scheduled appointments or most short notice encounters and by telephone 24/7 for all emergencies when working with LEP clients.

1. Serving LEP Clients in person (Welcome Center)

- a. When an LEP client/family 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 schedules appropriate follow-up services with a bi-lingual employee or contract interpreter present.
- b. If the LEP client's primary language is not Spanish or a bi-lingual employee is not available, the clerical specialist contacts a telephone interpreter; assists in determining the client's needs; and schedules appropriate follow-up services with a contract interpreter present.

2. Serving LEP Clients on the telephone

- a. When a Spanish speaking LEP client contacts DCFS by telephone, the clerical specialist or Child Protection Specialist adds a Spanish speaking bi-lingual employee to the call to determine the client's needs and schedules appropriate follow-up services with a bi-lingual employee or contract interpreter present.
- b. 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 schedules appropriate follow-up services with a contract interpreter present.

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

- a. When working an open case with an LEP family, all encounters will include the assistance of an in-person interpreter. All meetings are scheduled in advance with a contract interpreter present.

IV. Translation Services

A. Agency Forms & Case Specific Documents

- 1. When working with an LEP individual/family, the worker determines what critical agency forms and documents 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.

V. Documentation

- A. The Child Protection Specialist documents the primary language spoken by all LEP clients in SACWIS.

SEE ALSO:

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

To Access a Foreign Language or American Sign Language Interpreter

You no longer fill out a form to access an interpreter – Schedule an interpreter on-line.

- To schedule an in-person interpreter 24 hours or more in advance, visit: <https://ust-cle.interpretmanager.com>
- To schedule an in-person interpreter less than 24 hours in advance, visit: <https://ust-cle.interpretmanager.com> and follow up with a call to **1-877-581-4350**
- To use the services of a telephone interpreter immediately (24/7), call the telephone interpreter at: **216-242-4270**. (You must have your PIN)

1-855-774-5849 is no longer a valid number for interpreter services

DCFS Bi-Lingual Employees

(as of 9/1/2019)

TELEPHONE	EMPLOYEE	LANGUAGE	LOCATION	E-MAIL
635-3897	Jackelyn Caskey	Spanish	Quincy Place	Jackelyn.Caskey@jfs.ohio.gov
696-5437	Geraldo Quinones	Spanish	Jane Edna Hunter	Geraldo.Quinones@jfs.ohio.gov
881-4578	Maria Santana	Spanish	Jane Edna Hunter	Maria.Santana@jfs.ohio.gov
485-4923	Veronica Vazquez	Spanish	Old Brooklyn	Veronica.Vazquez@jfs.ohio.gov