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# LIMITED ENGLISH PROFICIENCY (LEP)

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LEP refers to the restricted ability to read, speak, write or understand English as a primary language.

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English can be limited English proficient, or “LEP.” These individuals may be entitled to language assistance with respect to a particular type of service, benefit or encounter.

Language for individuals with LEP can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities or understanding other information provided by federally funded programs and activities. The Federal Government funds an array of services that can be made meaningfully accessible to otherwise eligible persons with LEP.

The Federal Government is committed to improving the accessibility of these programs and activities to eligible persons with LEP.

Behavioral Health facilities are mandated to provide interpreter services at no cost to the individual with LEP. Individuals with restricted English comprehension of any type should be offered language assistance.

To comply with LEP guidelines, contractors must ensure that persons with LEP have meaningful access to all services and supports available. They must also be sure that individuals with LEP are not being discriminated against.

### Types of Illegal Discrimination:

- Intentional

- Disparate Impact – the policy or activity has the effect of discriminating

- Denying a benefit or opportunity to participate

- Providing different services/benefits

### Examples of Illegal Discrimination:

- Providing services/benefits in a different manner or in a segregated environment

- Restricting privileges

- Using policies/procedures that have the effect of discriminating

To ensure meaningful access Contractors must provide language assistance that results in accurate and effective communication at no cost to the individual.

Contractors must establish effective methods for notifying persons with LEP of their right to receive language assistance at **no cost**.

Staff must be trained to understand the LEP policies and procedures, how to work effectively with populations with LEP and how to provide effective language assistance services. LEP assistance services should be monitored. This ensures that policies and practices are effective and that staff are knowledgeable about the policies and practices and know how to implement the policies and practices. Staff must make sure persons with LEP are aware of the availability of services and how to access them.

The following is The Right Door for Hope, Recovery and Wellness' (Ionia County Community Mental Health) policy on Limited English Proficiency and a list of providers that The Right Door contracts with to assist with Limited English Proficiency.

## The Right Door for Hope, Recovery and Wellness

Chapter Title <b>Recipient Rights</b>	Chapter # <b>RR</b>		Subject # <b>993</b>
Subject Title <b>Limited English Proficiency</b>	Adopted 07/26/04	Last Revised 12/15/15	Reviewed 7/19/04 7/26/10; 8/22/11; 9/24/12; 12/16/13; 12/10/14 12/15/15

### POLICY

#### Application

This policy shall apply to The Right Door for Hope, Recovery and Wellness and all services operated by or under contract with it.

#### 1.0 Policy/Standards/General Practice:

Persons who are Limited English Proficient (LEP), visually and/or hearing impaired, will have meaningful and equal access to programs, services, and benefits throughout the operations of The Right Door for Hope, Recovery and Wellness and its provider network. Monitoring of language assistance services will occur annually and, at minimum, assess the following:

- the current LEP, visually and/or hearing impaired makeup of its service area
- the current communication needs of LEP, visually and/or hearing impaired applicants and recipients
- whether existing assistance is meeting the needs of such persons
- whether staff is knowledgeable about policies and procedures and how to implement them, and
- whether the sources of and arrangements for assistance are still current and viable

Monitoring will include feedback from recipients and advocates.

#### 2.0 Definitions

**Limited English Proficient (LEP):** An LEP individual is a person who is unable to speak, read, write or understand the English language at a level that permits him or her to interact effectively with health care providers and social service agencies. For the purposes of this policy, LEP will also apply to individuals whose primary form of communication is something other than the oral English language.

#### 3.0 Compliance Monitoring:

Compliance with this policy and all related procedures is ensured by The Right Door for Hope, Recovery and Wellness Quality Improvement Council.

#### 4.0 References

Affiliation Procedure: A0.3.1 Limited English Proficient: Access to Programs and Benefits  
Office of Civil Rights, LEP Appendix A, August 29, 2000  
Executive Order 13166 of August 11, 2000  
AFP, DCHHS Contract Requirements

The Right Door for Hope, Recovery and Wellness

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Melissa McKinstry, Chairperson	Date		



The Right Door for Hope, Recovery and Wellness contracts with the following to assist with Limited English Proficiency (LEP):

- Association for the Blind and Visually Impaired  
456 Cherry Street, SE  
Grand Rapids, MI 49503
- Bethany Christian Services  
901 Eastern Ave. N.E.  
Grand Rapids, MI 49501
- Hispanic Center of Western Michigan  
1204 Grandville Ave., S.W.  
Grand Rapids, MI 49503

If you need assistance with accommodating persons with LEP please contact The Right Door for Hope, Recovery and Wellness at 616-527-1790.