

**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):** 12/01/2019, 09/01/2018  
**Current Revision Date:** 03/01/2023  
**Approved By:** Jacqueline M. Fletcher, Interim Director

**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 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 and Compliance**

- A. The Civil Rights Coordinator files a bi-annual LEP Plan signed by the Director which includes ODJFS 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 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.
- C. DCFS does not permit the use of any electronic interpreter or translation software or application to be substituted for the use of professional interpreters from our current service vendor.
- D. DCFS is responsible for the cost for all interpreters and translation of documents provided by our contract vendor for all services provided by DCFS (meetings, visits or phone calls with clients and/or family members or other parties to the case.) Interpretation or translation provided for a client to participate in services at all community-based providers, including services required by DCFS, are to be paid for by the community-based provider. This requirement is included in the provider's contract with the County and the cost of using interpreters should be included in their cost.

### **III. Procedures for Accessing Interpreter Services**

- A. Foreign Language and American Sign Language Interpreters are available for all contact encounters between clients and DCFS workers. Interpreters are available in-person, virtually via smart device or by telephone. Scheduling interpreters in advance is always preferred.
- B. DCFS has a limited number of Bi-Lingual employees who have been trained and are certified to assist clients at DCFS in an emergency until a professional interpreter from our vendor can be reached. A list of DCFS Bi-Lingual employees is available at the Welcome Center/Front Desk, on the DCFS Intranet or attached to the electronic employee directory.
- C. Interpreters Accessibility
  - For LEP clients who call DCFS, interpreters are available by telephone.
  - For LEP clients who walk-in to DCFS, interpreters are available by telephone or smart device.
  - For LEP client contact at their home or out in the community, interpreters are available by smart device or in person with advance notice/scheduling.
- D. The current procedures for scheduling an interpreter from the HHS/DCFS language services vendor are reviewed in the DCFS Annual Civil Rights Training, included as part of the new worker training curriculum and posted on the DCFS Intranet. Scheduling an interpreter is usually completed on-line and requires employees to be pre-registered with the vendor. Please refer to the latest posted procedures as requirements and telephone number change.

### **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:**

### Intranet

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