St. Clair County Community Mental Health
Providing Opportunities for Health, Wellness, & Connection

Board Policy

Policy Title:	**Limited English Proficiency (LEP)**
Policy #:	**06-002-0015**
Effective Date:	//2026
Approved by:	SCCCMH Board of Directors
Functional Area:	Human Resources, Training
Responsible Leader:	Telly Delor, Chief Operating Officer
Policy Owner:	Aubree Mayhew, Administrative Specialist, Public Relations/Community Relations
Applies to:	Community Agency Contractor, Contracted Network Providers, Directly Operated Programs, Specialized Residential Providers, SCCCMH Staff, SCCCMH Board

Purpose: To remove barriers to meaningful access by individuals with *Limited English Proficiency* (LEP) to our services, activities, programs, and other supports.

I. Policy Statement

It is the policy of St. Clair County Community Mental Health (SCCCMH) Board to provide resources to individuals who have difficulty reading, writing, speaking, or understanding English, and who do not speak English as their primary language, with limited English Proficiency (referred to as LEP in this policy).

II. Standards

A. SCCCMH and its Provider Network shall provide reasonable access to *linguistically appropriate services* at no cost and based on the needs of the population served.

B. Individuals and their families will be informed of the availability of such assistance

C. SCCCMH will ensure service information is offered in a manner easily understood by the population served, including information contained in vital documents, such as waivers of rights, consent to treatment forms, financial and insurance benefit forms, etc.

D. Policies will address the special needs of individuals with LEP.

E. LEP reference is maintained at the Main Reception Areas of each site, which includes “I Speak Cards” for language identification use.

F. If an individual requests services and is unable to effectively communicate using English, any office and/or program must have processes in place to facilitate communication in order for the individual to obtain access to services.

G. Language assistance will be provided through the use of competent bilingual staff, staff interpreters, contracts or formal arrangements with local organizations providing interpretation or translation services, or technology (i.e., video) and telephonic interpretation services.

H. All staff will be provided with notice of this policy and procedure, and staff that may have direct contact with individuals with LEP will be trained in effective communication techniques, including the effective use of an interpreter.

I. SCCCMH will conduct a regular review of the language access needs of our population, as well as update and monitor the implementation of this policy and these procedures, as necessary.

III. Procedures, Definitions, and Other Resources

A. Procedures

Actions

Action Number	Responsible Stakeholder	Details
1.0	Staff	1. Use varied/creative methods of communication based on the cultural background of the individual. These may include (but are not limited to): a. Pad and pencil. b. Picture board. c. Use of interpreters, either in person or via phone and/or video based upon availability. d. Use of an individual's family member as interpreter only if it is the person's choice and after they have been informed that an interpreter is available to them at no additional expense. e. Electronic Health Record (EHR) information can be translated into specific languages at the individual's request. 2. Use culturally and linguistically appropriate screening tools when appropriate.
2.0	Administration	3. Provide agency information in varied forms that may be understood by all individuals. This may include (but is not limited to): a. Key brochures printed in languages that support the

Action Number	Responsible Stakeholder	Details
		cultural ethnicity of the individual and are recorded to meet the needs of individuals with visual impairment. b. Agency brochures written at a *basic reading level*, easy to read font, with frequent headings, and short simple explanations of key concepts. c. Video and/or audio tapes describing services available, appeals process, and other vital information. 4. Provide for contract interpretation services in languages relevant to the population served, either in person or via telephone and/or video based upon availability. 5. Ensure employees receive LEP training upon initial hire and at intervals required by accreditation, regulatory and licensing bodies. 6. Ensure interpreters are trained to function in a medical and behavioral health setting and understand and adhere to confidentiality and privacy requirements.
3.0	Safety Committee	7. Ensure agency signage incorporates internationally recognized symbols as well as Braille as required by law.
4.0	Community Relations Team	8. Seek out venues to promote agency services to community residents who have LEP. This may include, but is not limited to: a. Radio advertisements. b. Participation in health fairs targeted for groups which may include a LEP population.

B. Related Policies

N/A

C. Definitions

1. *Basic Reading Level:* The reading level at which an individual is able to understand the overall meaning of what they read.
2. *Limited English Proficiency (LEP):* Persons who do not speak English as their primary language or who have a limited ability to read, write, speak, or understand English.
3. *Linguistically Appropriate Services:* Services provided in the language best understood by the individual receiving services through bilingual staff and/or the use of qualified interpreters, including American Sign Language (ASL), to individuals with LEP. These services are a core element of cultural competency and reflect an understanding, acceptance, and respect for the cultural values, beliefs, and practices of the community of individuals with LEP.

D. Forms

N/A

E. Other Resources (i.e., training, secondary contact information, exhibits, etc.)

Exhibit A: St. Clair County Community Mental Health Authority "Tips for Respecting Diversity in the Workplace"

F. References

1. Americans with Disabilities ACT of 1990 (ADA)
2. MDHHS Contract
3. *4.30.4 – Raised and Brailed Characteristics and Pictorial Symbol Signs (Pictograms)
4. Michigan Building Code
5. HHS.Gov/civil rights
6. Office of Civil Rights Policy Guidance on the Title VI Prohibition Against Discrimination
7. CCBHC Handbook and certification criteria

IV. History

- Initial Approval Date: 02/2002
- Last Revision Date: 08/2025 BY: Aubree Mayhew
- Last Reviewed Date: 03/2026 BY: Aubree Mayhew
- Non-Substantive Revisions: N/A
- Key Words: limited, English, language, speak, proficiency, foreign, translator, translate, interpret, linguistic, LEP