

Interpreters for Patient Communication

KEY TERMS: Interpreter services, communication, translation, electronic devices, Limited English Proficiency (LEP), Video Relay Interpretation (VRI)

I. PURPOSE:

Carilion Clinic is committed to providing excellent patient care and will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs, and other benefits.

II. SCOPE/FACILITY/DEPARTMENT(S):

The scope of this policy covers Nursing at the following facilities: CMC, CFMH, CGCH, CNRV, CRBH, and CTCH. This policy also includes Ambulatory, Home Health/Hospice, Psychiatric and Physical Rehabilitation departments.

III. POLICY STATEMENT(S)

- A. Carilion Clinic care team members have numerous resources to support effective communication for patients with LEP across the organization, including, but not limited to, the use of live on-site interpreter services, telephone interpreter services, video relay interpreter services, TTY/TDD devices, pre-translated documents, and non-verbal communication aids such as picture boards.
- B. Carilion Clinic policies and processes are designed to detect barriers to effective communication, and to enable staff to employ the appropriate tools or services to ensure that all patients receive high quality and safe care.
- C. **Care team members will not request adult friends or relatives of the patient to interpret for the provider or the patient, except in emergent or critical situations whereby delaying communication may jeopardize the safety of the patient.** Minors will never be used to interpret except in life threatening emergencies where there is no qualified interpreter immediately available.
- D. A practitioner/ACP or nurse will remain with the patient at all times while interpreter services for communication assistance are provided.
- E. *Minor revisions/clarifications made effective February 2023 from prior version:*
 - 1. *Changed Carilion Clinic “staff” to “care team members” in policy statements.*
 - 2. *Added “care team members” to statement in IV.D.3.*

IV. PROCEDURE:

A. Identifying LEP Patients with Communication Needs

1. Carilion Clinic staff will promptly identify the language and communication needs of patients with LEP, including a patient's authorized representative and/or patient companion.
2. Assistance will be offered if there is any perception of communication deficit, or upon request of the patient (regardless whether there is an evident deficit). Communication assistance for these parties will be maintained as required through discharge.
3. The assistance provided will be free of charge, accurate, timely, and provided in a way that will protect the privacy and independence of the patient. A patient will never be required to provide their own interpreter.
4. Some examples for which an interpreter or other communication resource may be necessary include, but are not limited to, the following:
 - a. To collect patient assessment data at admission
 - b. To explain hospital policies and procedures, including essential patient information at admission
 - c. To provide information and get patient feedback about patient rights, advance directives, and informed consents for treatment
 - d. To explain information about prescribed medication, procedures, tests, treatment options, treatment, or surgical procedures
 - e. To facilitate involvement in therapeutic activities
 - f. To provide discharge instructions
 - g. To explain billing or insurance issues

B. Obtaining Effective Communication Services for Patients with LEP

1. Locating interpreters and communication services is the responsibility of the unit, office, or facility. The type of communication assistance may vary according to the needs of the patient and the nature of the situation but will be adequate to ensure that the patient is able to participate in his or her care in a meaningful way.
2. For up-to-date instructions on how to obtain interpreter services, please consult the Interpreter Services hub on the InsideCarilion website at <http://insidecarilion.org/hubs/interpreter-services>.
 - a. To request a face-to-face interpreter during regular business hours (Monday-Friday 8am-5pm), call the Interpreter Services office at 540-266-6307, or send an email to Interpreter_Services@carilionclinic.org. All live interpreters will have a picture identification badge.
 - b. After hours, utilize PerfectServe or the call Carilion Direct (operator) if a face-to-face interpreter is needed. Utilize audio or video interpreter, if appropriate.

C. Providing Translations of Written Documents & Forms to Patients with LEP

1. When requested, each unit, office, or facility will provide translation of vital written materials, free of charge, for LEP patients. Any document or form submitted for translation should be sent to Interpreter_Services@carilionclinic.org. The document will then be returned in final, approved form.
2. Pre-translated in-patient documents and forms in Spanish can be accessed through the Interpreter Services Dept.

D. Refusal of Carilion Clinic Interpreter Services:

1. Interpreter Services will be made available to LEP patients (face-to-face, audio, or video). If the LEP patient declines the offer to use Carilion Clinic interpretation services, at no additional expense to the patient staff should document in the refusal in the medical record (see section 'E' for further details).
 - a. Some LEP patients may request to use a family member or friend as an interpreter. Carilion Clinic does not encourage or suggest the use of friends or family members as informal interpreters in non-emergent situations. Staff will not request adult friends or relatives of the patient to interpret for the provider or the patient, **except in emergent or critical situations whereby delaying communication may jeopardize the safety of the patient.**
 - **Minors will never be used to interpret except in life threatening emergencies where there is no qualified interpreter immediately available.**
 - b. The patient should continue to be offered interpreter services, even if they have previously expressed their preference to use a family member or friend as an interpreter.
 - c. Any refusal to use interpreter services for LEP patients should be documented with each encounter. A refusal form should be completed to document the patient's decision to proceed without utilizing Carilion Clinic interpreter services (see section 'E' for further details).
2. Patients are permitted, upon their own request, to use an intelligent personal assistant, if provided by the patient, while receiving inpatient services. An "intelligent personal assistant" is defined as a combination of an electronic device and a specialized software application designed to assist users with basic tasks using a combination of natural language processing and artificial intelligence, including such combinations known as "digital assistants" or "virtual assistants."¹
 - Carilion Clinic staff will not suggest, offer, or otherwise encourage the use of such devices for interpretation services.
3. The Carilion Clinic practitioner/ACP or care team members are strongly encouraged to utilize Carilion Clinic-approved interpreter services in the delivery of care, even if refused by the patient, especially for instances that require effective/extended communication between the practitioner/ACP and the patient, or when sensitive information will be discussed.

- a. Regardless of patient decision, the practitioner/ACP has a legal right to determine whether Carilion Clinic approved language assistance services will be used for themselves.
- b. The practitioner/ACP should document in the patient's medical record any decision to proceed without utilizing Carilion Clinic interpreter services and a refusal form should be completed.

E. Documentation of Communication Assistance Provided to Patients with LEP

1. Staff will document in the patient's medical record when communication assistance is **provided or declined**. Documentation is completed according to department workflow. Examples are:
 - a. 'Smartphrase for Interpreter'
 - b. A progress note with a dot (.) phrase
 - c. 'Letters' to indicate refusal
 - d. Free form progress note
2. When utilizing technology services (video or audio), document the 'Interpreter ID number' provided by the interpreter at the beginning of the session.
3. For further assistance on documentation of communication assistance, contact the Interpreter Services Department.

V. OTHER ISSUES / CONCERNS:

N/A

VI. DEFINITIONS:

Carilion Clinic Approved Interpreter: An interpreter supplied by Carilion Interpreting Services

Carilion Clinic Dual-Role Bilingual Employee: A Carilion employee who has completed a proficiency language test provided via Carilion Interpreter Services and has been given the approval to communicate in that second language with patients within their job role at Carilion.

- Staff who are interested in becoming a dual-role bilingual employee should contact Interpreter Services.

Carilion Clinic Contracted Interpreter: An interpreter who is contracted independently, or with a vendor who is under contract with Carilion Interpreting Services, and that meets minimum criteria as set forth by the Office of Clinical Quality and/or Contracting. Carilion Clinic Contracted Interpreters provide interpreting services in compliance with all federal, state, and local policies, laws, and regulations regarding licensing requirements for interpreters, as applicable.

Carilion Clinic Employed Interpreter: An individual interpreter employed by Carilion Interpreting Services that meets minimum criteria as set forth by the Carilion Clinic Department of Human

Resources, including proficiency in both written and spoken English and the providing language, certification as a medical interpreter by a Carilion Clinic recognized agency, and 10 hours of continuing education annually.

Limited English Proficiency (“LEP”): Individuals who do not speak English as their primary language and/or who have a limited ability to read, speak, write, or understand English.

Text Telephone (“TDD”): A special device that lets people who are deaf, hard of hearing, or speech-impaired use the telephone to communicate, by allowing them to type messages back and forth to one another instead of talking and listening.

Video Relay Interpretation (“VRI”): a video telecommunication service that uses devices such as web cameras or videophones to provide sign language or spoken language interpreting services via a remote or offsite interpreter

VII. REFERENCES/OTHER SOURCES:

1. HB2154 Hospitals, nursing homes, etc; regulations, patient access to intelligent personal assistant. (2021). Virginia’s Legislative Information System. <https://lis.virginia.gov/cgi-bin/legp604.exe?212+sum+HB2154>

VIII. APPENDICES:

None.

IX. APPROVALS: This P&P is a Systemwide Policy. Change can only be made with the approval of the appropriate committee below.

Facility	Dept. / Committee	Name / Title	Date
System	System Clinical Policy and Procedure Committee		09-2022
	Interpreter Services	Heather Bramblett, Director	09-2022
	Multidisciplinary Ambulatory Council		12-2022
	Home Health/Hospice		12-2022
	Nurse Executive Committee		11-2022
CFMH	CFMH Policy & Procedure Committee		10-2022
	CFMH Medical Executive Committee		10-2022
CGCH	CGCH HP&P Committee		10-2022
	CGCH Medical Executive Committee		10-2022
CMC	Nursing Professional Practice Council		10-2022
CNRV	CNRV Policy & Procedure Committee		10-2022
CRBH	CRBH Policy & Procedure Committee		10-2022
	CRBH Medical Executive Committee		11-2022
CTCH	CTCH Policy & Procedure Committee		10-2022