

### Non-Discrimination: Communication PC.N02

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**Regulatory Citation(s):** 42 CFR 418.52(a); Title VI HHS Guidance for LEP (August 8, 2003, 68FR 47311)

**L-Tag(s):** 502

**POLICY:** Lifesong Hospice and Palliative Care attempts to ensure meaningful access to its services by persons with communication challenges.

#### PROCEDURE:

1. The patient's ability to communicate and specific communication challenges, if any, are assessed during the referral/intake process.
2. If a patient has a language or sensory impairment that hampers meaningful communication, efforts are made to ensure the patient's communication needs are met during the admission process and throughout care.
3. *For patients with limited English proficiency (LEP):*
  - a. The hospice conducts an analysis of the number or proportion of LEP persons eligible to be served or likely to be encountered in the hospice's service area and determines the likely frequency of contact with LEP persons;
  - b. The hospice determines reasonable and necessary interpreter (verbal communication) and translation (written communication) services needed to meet the needs of LEP persons.
  - c. Reasonable interpreter services may include, but are not limited to:
    - i. hiring or contracting with staff interpreters;
    - ii. using telephone interpreter lines;
    - iii. using staff or hospice volunteers proficient in the target language; and
    - iv. using family members or friends of the patient (if the patient is in agreement).
  - d. Reasonable translation services may include, but are not limited to:
    - i. Determining which documents provided to patients/representatives are essential for translation and into which languages
    - ii. Obtaining professional and competent translation services and ensuring the translated documents are provided to LEP persons as needed and appropriate.

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4. *For visually impaired patients:*
  - a. The hospice staff member reads aloud all documents normally provided to the patient during admission and documents in the clinical record that the patient/family has understood what was read.
5. *For hearing impaired patients:*
  - a. The hospice staff member determines if writing, lip reading, or signing is the most effective means of communication with the patient.
  - b. If sign language is the most effective means of communication, the hospice contacts resources in the community that provide signing services.

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