



Limited English Proficiency Plan

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261 M-62 North
Cassopolis, MI 49031
(269) 445-3874
www.cassfamilyclinic.org

Introduction

This Limited English Proficiency Plan (LEP) has been prepared to address the responsibilities of Cassopolis Family Clinic Network (CFCN) as a recipient of federal financial assistance through the Bureau of Primary Healthcare (BPHC) as they relate to the needs of individuals with limited English language skills. This plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, which states no person shall be subjected to discrimination on the basis of race, color, or national origin.

Executive Order 13166, signed on August 11, 2000 and titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

Plan Summary

Cassopolis Family Clinic Network (CFCN) is a nonprofit organization which serves Cass and Southeastern Berrien Counties in Michigan, providing medical, dental, behavioral health, and pharmacy services to the residents of its communities. This LEP Plan has been developed to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access the services provided by CFCN. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, CFCN used the Four-Factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to receive treatment at a CFCN facility.
2. The frequency with which LEP persons come in contact with CFCN services.
3. The nature and importance of services provided by CFCN to the LEP population.
4. The resources available to CFCN and overall cost to provide LEP assistance.

A summary of the results of the CFCN four factor analysis is in the following section.

Four Factor Analysis

1. The number or proportion of LEP persons in the service area who may be served or are likely to receive treatment at a CFCN facility.

The 2013 U.S. Census Bureau's LEP report estimates in Cass County there is a total LEP population of 0.94% and in Berrien County an estimated to 2.37%.

The U.S. Census Reports with population estimates for 7/1/19 which showed that in Niles there is an estimated 5% of the population that speaks a language other

than English in their home. In Cass County there is an estimated 3.2% of the population that speaks a language other than English in their home. CFCN's service area has a much lower percentage compared to the National data for the same time period of 21.5%.

2. The frequency with which LEP persons come in contact with CFCN services.

As a Federally Qualified Health Center CFCN is required to complete the Uniform Data System report annually In Calendar Year 2017 there were 55 patients of 13,088 that stated they were best served in a language other than English. In Calendar Year 2018 there were 58 patients of 12,769 that stated they were best served in a language other than English. This totals out to .45% of CFCN's patient population. Year 2019 there were 223 patients of 12,650 that stated they were best served in a language other than English. This totals out to 1.76% of CFCN's patient population.

3. The nature and importance of services provided by CFCN to the LEP population.

CFCN provides medical, dental, behavioral health, and pharmacy services to the underserved and underinsured members of Southeastern Berrien and Cass Counties. Within the service area, over 95% of the population speaks English. As a result there are very few organizations within the service area that focus on outreach to LEP individuals. The community health center in Northern Berrien County receives special population funding to support outreach to the migrant worker community.

4. The resources available to CFCN and overall cost to provide LEP assistance.

CFCN has on retainer a telephone interpretation service, which allows any staff member to contact an interpreter during our normal business hours. The cost of the translation service is a monthly fee with attached usage.

Work Plan

1. How CFCN staff may identify a LEP person who needs language assistance;

- a. Staff engage in conversation with patients as they make appointments or as they arrive at their appointment at which time they may gauge each patient's ability to speak or understand English.
- b. Staff may examine patient records to see if requests for language assistance have been received in the past.
- c. CFCN will post notices of the LEP Plan and the availability of interpretation/translation services free of charge in languages LEP persons would understand.
- d. CFCN will provide training to staff annually. Staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.

2. Language Assistance Measures

- a. There are several language assistance measures available to LEP persons including both oral and written language services. There are also various ways in which CFCN staff respond to LEP persons, whether in person, via phone, or in writing.
- b. Interpreters are available via telephone during the health center's normal business hours.
- c. Posting interpretation services on our organization's website, with information on how to access them.
- d. Post written notice about the availability of interpretation services in the most common languages in the area.
- e. Include notification that interpretation services are available in public handouts.

3. Staff Training

The following training will be provided to CFCN staff.

- a. Information on the CFCN Title VI procedures and LEP responsibilities.
- b. Description of the language assistance services offered to the public.
- c. Documentation of language assistance requests.
- d. How to handle a potential Title VI/ LEP complaint.

4. Translation of Documents

- a. CFCN weighed the cost and benefits of translating documents for potential LEP patients. Considering the expense of translating the documents as well as the likely occurrence of frequent changes, at this time it is an unnecessary burden to have any documents translated. CFCN does not meet the percentage of patient requirement by HRSA (Health Resources and Services Administration) to have documents in more than one language.
- b. If a patient requests specific information prior to their appointment staff will connect with a translator to have the information available at the time of the visit.

Monitoring, Evaluating, and Updating the LEP Plan

CFCN will review and evaluate the LEP at a minimum of once per calendar year and update as needed. The plan will be updated when there is new data available from the Census Bureau or when it is clear that there is a higher concentration of LEP individuals in our service area. Updates will include the following information:

1. The number of documented LEP person contacts encountered annually based upon information collected for the Uniform Data System report.
2. How the needs of LEP persons have been addressed.
3. Determination of the current LEP population in the service area.
4. Determination as to whether the need for translation services has changed.

5. Determine whether local language assistance programs have been effective and sufficient to meet the need.
6. Determine whether CFCN's financial resources are sufficient to fund language assistance resources as needed.
7. Determine whether CFCN has fully complied with the goals of this LEP plan.
8. Determine whether complaints have been received concerning CFCN's failure to meet the needs of LEP individuals.

Dissemination of CFCN's LEP Plan

1. A link to the LEP access plan will be included on CFCN's website:
www.cassfamilyclinic.org.
2. Copies of the plan will be available upon request via fax, mail, or presented in person.

Questions or comments regarding the LEP Plan may be submitted to Cassopolis Family Clinic Network's LEP Coordinator:

Meredith Kujawa
Cassopolis Family Clinic Network
261 M-62
Cassopolis, MI 49031
(269) 445-3874 ext. 137
mkujawa@cassfamilyclinic.org