

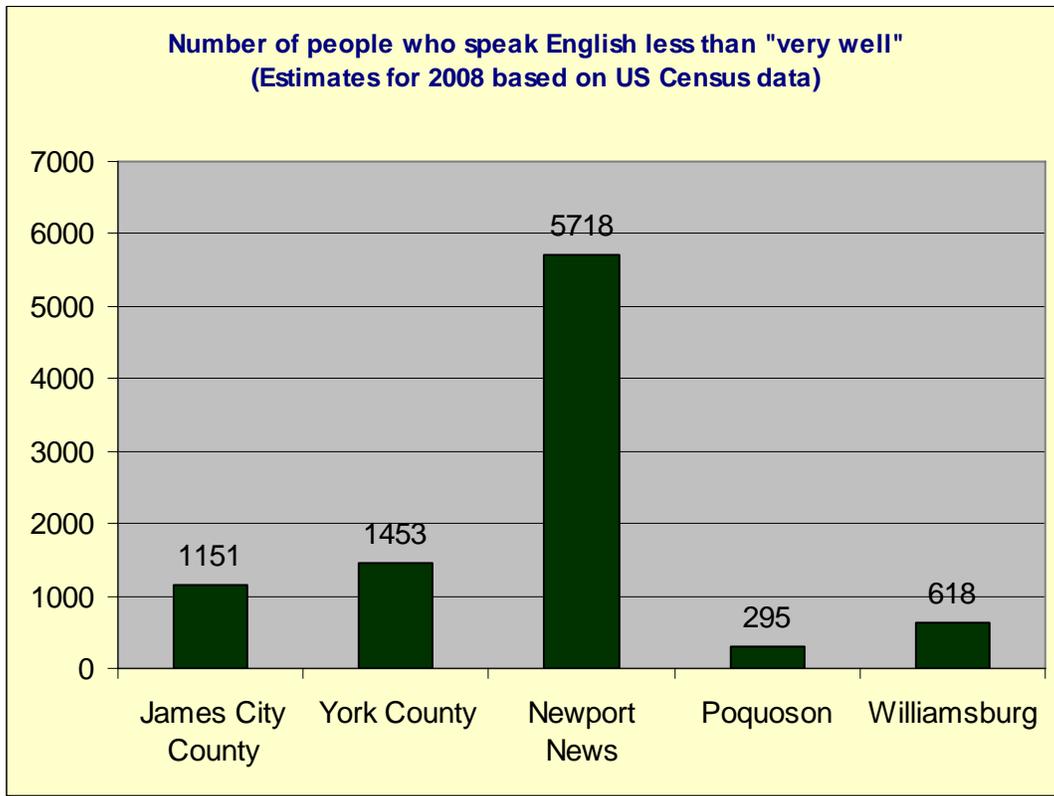
2010 LANGUAGE NEEDS ASSESSMENT: PENINSULA HEALTH DISTRICT

(Areas covered: James City County, York County, Cities of Newport News, Poquoson, Williamsburg)

HOW DOES THE CLAS REQUIREMENTS IMPACT THE PENINSULA HEALTH DISTRICT?

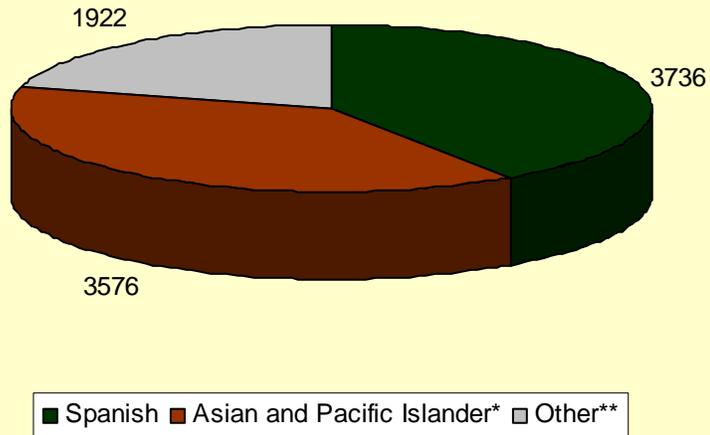
The obligation to provide meaningful access is fact-dependent and starts with an individualized assessment that balances the following four factors:

1. The number or proportion of limited English proficient (LEP)¹ persons within this district:



¹ Individuals are considered limited English proficient (LEP) if they “do not speak English as their primary language and...have a limited ability to read, speak, write or understand English.” (From www.lep.gov.)

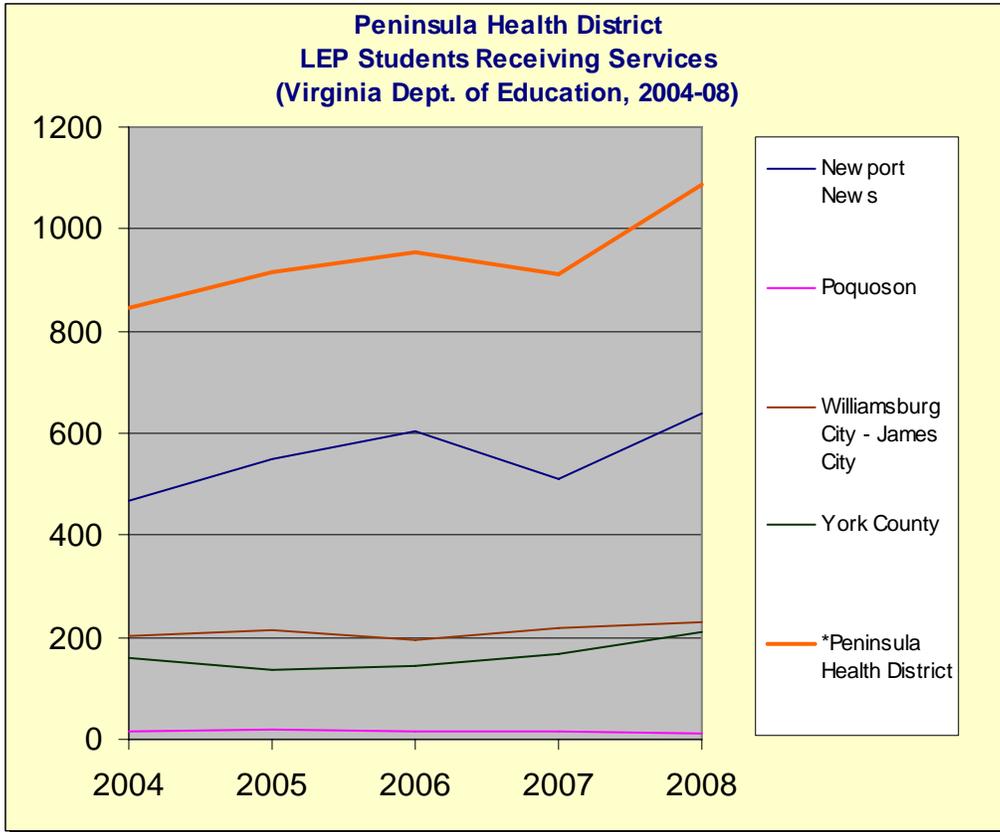
**Languages spoken by LEP individuals,
Peninsula Health District
(Estimates for 2008 based on US Census data)**



*Based on US Census language designations. Asian and Pacific Islander languages include, but are not limited to: Burmese, Cambodian, Chinese, Indonesian, Japanese, Korean, Mongolian, Tagalog, Thai, Turkish and Vietnamese.

**Based on US Census language designations. Other languages include, but are not limited to: Albanian, Amharic, Arabic, Bengali-Bengla, French, German, Hindi, Italian, Kurdish, Nepali, Persian, Portuguese, Russian, Somali, Sudanese, Tigrinya, Ukranian and Urdu.

Based on 2008 estimates from US Census data, 9,234 of the residents of Peninsula Health District are considered LEP. The number of LEP individuals is significantly higher in Newport News (5,718 LEP residents). Of the LEP residents in the Peninsula Health District, 40% speak Spanish as their primary language.



** The Health District total is the sum of all LEP Students within the cities and counties of the district.*

Based on data from the Virginia Department of Education, the number of LEP students receiving educational services in the Peninsula Health District has increased by 29% over the last five years. This indicates that the overall LEP population in the area is growing.

2. The frequency with which LEP individuals come into contact with the program:

The following is patient level data for the Peninsula Health District as reported in the Virginia Department of Health's (VDH) Web Vision, January- December 2008*:

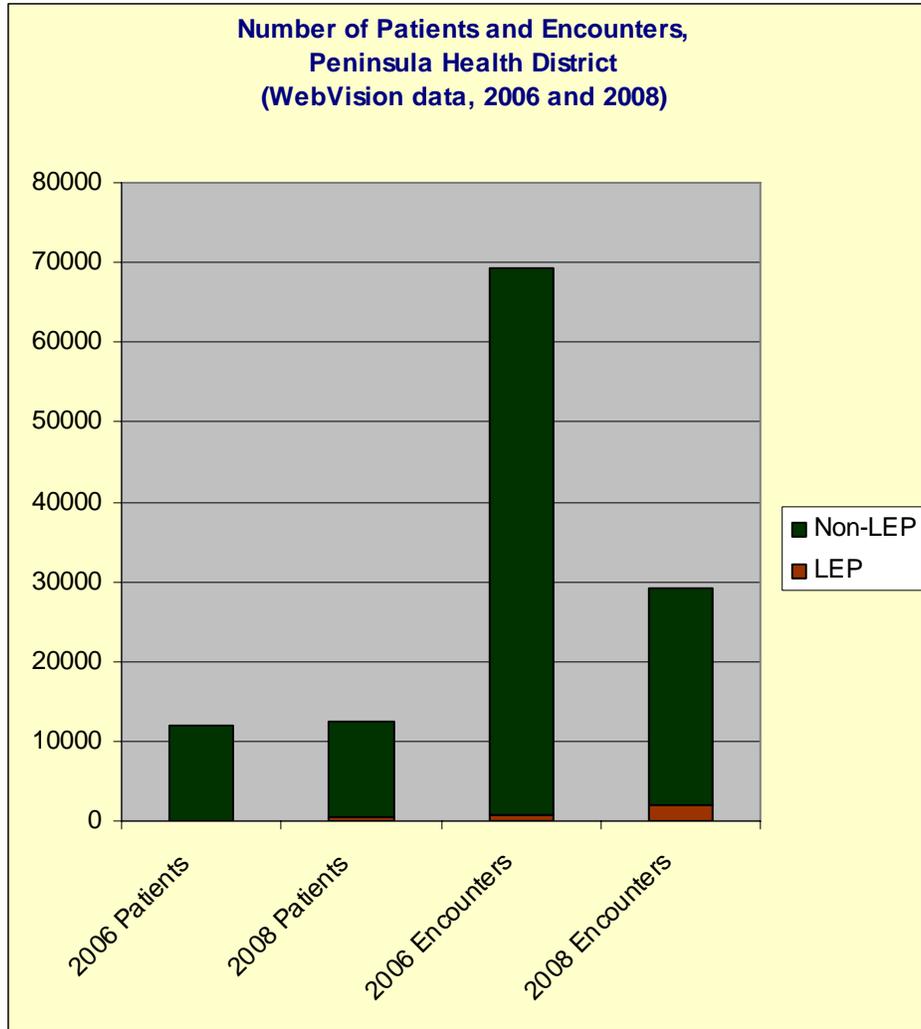
Primary Language**	Patients (unduplicated count)		Patient encounters	
	#	%	#	%
English	11,977	96.42%	26,948	92.53%
Spanish	235	1.89%	626	2.15%
Burmese	72	0.58%	848	2.91%
French	17	0.14%	127	0.44%
Arabic	14	0.11%	52	0.18%
Bhutani	9	0.07%	63	0.22%
Nepali	7	0.06%	54	0.19%
Tagalog	4	0.03%	18	0.06%
Korean	3	0.02%	13	0.04%
Somali	3	0.02%	50	0.17%
Cambodian	2	0.02%	6	0.02%
Vietnamese	2	0.02%	8	0.03%
Amharic	1	0.01%	1	0.00%
Chinese	1	0.01%	23	0.08%
Chinese-Cantonese	1	0.01%	1	0.00%
Croatian	1	0.01%	10	0.03%
German	1	0.01%	25	0.09%
Kirundi	1	0.01%	10	0.03%
Kurdish	1	0.01%	1	0.00%
Turkish	1	0.01%	1	0.00%
Peninsula Health District	12,422	100.00%	29,124	100.00%

* The listed languages may not equal 100% because of the exclusion of rarely encountered languages and non-English speakers who are not Limited English Proficient.

** By need for an interpreter (responses of "yes" & "unknown")

According to this data, for the Peninsula Health District:

- ◆ 3.07% of all patients are LEP
- ◆ 6.75% of all encounters involve LEP patients.



Since the most recent language needs assessment in 2007, there has been an increase in proportion of LEP patients and encounters. The 2007 report showed that about 1% of all patients and encounters were LEP. Comparing this data from the 2007 report with more recent data, it is evident that the number and proportion of LEP patients and encounters in the Peninsula Health District has increased, even as the total number encounters decreased significantly.

3. The nature and importance of the program, activity or service provided by the recipient (VDH) to its beneficiaries.

The agency should consider the importance and urgency of its program, activity or service. If the activity is important and urgent, immediate language services are needed. If the activity is important but not urgent, language services are needed but can be delayed for a reasonable period of time. (See [Title VI federal guidelines](#) or the language needs assessment home page for more guidance on this matter.)

4. The resources available to the grantee/recipient (VDH) and the costs of interpretation/translation services.

Agencies should carefully explore the most cost-effective means of delivering competent and accurate language services due to resource concerns. In many cases it is more cost-effective

to hire staff or take other appropriate measures, thereby improving the quality of service. Resource limitations must be well-substantiated before using this factor as a reason to limit language assistance. (See [Title VI federal guidelines](#) or the language needs assessment home page for more guidance on this matter.)

Based on the federal requirements, the following processes should be in place at the Peninsula Health District to ensure compliance:

- **Notification of Rights:** Both verbal offers and written notices informing clients of their right to receive language assistance services at no cost to them. For this purpose, VDH has designed a language identification poster that informs patients in 32 languages of their rights to a trained interpreter at no cost. Copies of this poster should be displayed at all offices of the health district and as appropriate in multiple locations within offices. This poster is available online at <http://www.vdh.state.va.us/healthpolicy/healthequity/documents/8x11languagecard.pdf>.
- **Interpretation Services:** Interpretation services should be provided to all LEP patients at no cost and at all points of contact in a timely manner during all hours of operation. LEP persons cannot be required to bring their own interpreters nor should they use family members or friends as interpreters unless specifically requested by the patient/consumer after receiving notification of their rights to receive language assistance services at no cost to them. On-site interpretation should be provided in any language whose speakers are at least 500 of the district's patient encounters.
 - Based on the four factor assessment, it is recommended that the Peninsula Health District provide on-site interpreters either through a contractual arrangement with a language service agency, the use of in-house interpreters and/or the use of bilingual staff for the following language(s): **Spanish and Burmese**. The on-site interpretation can be provided by part-time trained interpreters (estimated cost²: \$11,894 for Spanish interpreters and \$16,112 for Burmese interpreters) or by bilingual employees who have been trained in medical interpreting (estimated cost³: \$500 - \$1,500 for Spanish bilingual employees and \$1,000-\$3,000 for Burmese bilingual employees). The use of bilingual employees who have been trained in medical interpreting is preferred, as it is the more cost-effective option.
- **Assurance of Competence:** have a mechanism for assuring the competence of the language assistance provided.
 - It is recommended that the Peninsula Health District utilize interpreters and translators (whether they are in-house, bilingual professional staff, or contract interpreters and translators) who:
 - have been screened and tested for proficiency in both English and the target language(s)
 - have received a minimum of 40 hours of training as professional

² Calculation based on the Bureau of Labor's national median wage (\$19.00/hr.) for interpreters and the estimation that each LEP encounter is equivalent to one hour of work for an interpreter.

³ Calculation based on the estimated need of one bilingual employee per 500 LEP encounters in target language. Cost will vary based on the amount of the bonus given; range of recommended bonus for bilingual employees: \$500 - \$1,500.

medical/health care interpreters (the training should include, but not be limited to, the following topic areas: ethics and confidentiality, medical terminology, basic anatomy and physiology, roles, and cultural competence)

- adhere to an interpreter and translator Code of Ethics, a statement of confidentiality, and are aware of and comply with HIPAA related privacy guidelines
 - participate in ongoing medical/healthcare interpreter and translator continuing education
 - have subject matter expertise in medical and health care and prior experience translating medical/health documents
 - are able to write at an appropriate reading level for the target audience
 - have been screened and tested for proficiency in both written English and the target language(s) with affiliation/accreditation by the American Translators Association preferred
 - are able to act as a cultural bridge, providing VDH with feedback not only on grammatical and linguistic accuracy, but also on cultural appropriateness
 - do not rely on software-based translation programs
 - are covered by liability insurance
- ◆ **Translated Materials:** make available easily understood patient-related materials and post signage in the languages of the commonly encountered group and/or groups, including written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered.

In order to help health districts comply with the culturally and linguistically appropriate health care services (CLAS) requirements, VDH has contracted with Language Services Associates, a provider of telephonic interpretation and translation by trained and certified professionals. Data suggest that this is been an underused resource in Peninsula, as the number of LEP encounters has surpassed the number of telephonic interpretation calls made. The following chart summarizes the 2008 calls.

Language	# of Calls	Minutes	Total Charge
Spanish	5	49	\$56.35
Nepali	3	50	\$72.50
French	2	28	\$40.60
Karen	2	14	\$20.30
Korean	1	3	\$4.35
Peninsula Health	13	144	\$194.10

Summary

Culturally and linguistically appropriate health care services (CLAS) requirements obligate each health district to provide suitable language access for all district services at no additional cost to the patient. The determination of the district's language needs is made based on data from the US Census, the Virginia Department of Education (DOE), the Virginia Department of Health (VDH), and Language Services Associates (LSA), the telephonic interpreting provider for VDH. According to 2008 estimates, 9,234 limited English proficient (LEP) individuals reside in the Peninsula Health District, comprising 3% of the total population in the district. 40% of the LEP population in Peninsula speaks Spanish as its primary language. DOE data indicates that the LEP population is growing: the number of LEP students receiving services has increased 22% over the last five years.

In the Peninsula Health District 3% of all patients and 7% of all encounters were LEP patients in 2008. These figures represent a significant increase from the proportion of LEP patients and encounters reported in the 2007 language needs assessment. Health services providers should pay special attention to the emerging Burmese population, which comprised 3% of all encounters in Peninsula Health District in 2008.

This report has made new compliance recommendations for the Peninsula Health District. It is now recommended that Peninsula Health District offer on-site interpretation in **Spanish** and **Burmese**. As in 2007, all other patients should be notified of their right to a trained interpreter at no cost; LSA telephonic interpretation should be utilized for this purpose. Note: Health service providers should note that the use of untrained medical interpreters, such as family and friends of the patient, is unacceptable when a trained interpreting service (including telephonic interpreting) is available.

While Spanish is the primary non-English language that is spoken in the Peninsula Health District, non-English speakers of other languages represent 60% of the LEP total and must be seriously considered. There are 5498 individuals in the Peninsula Health District who speak neither English nor Spanish as their primary language, representing 1.7% of the total population of the district. These groups form a significant subset of the population in Peninsula; therefore, they should be a special focus of health department programs. WebVision data indicates that the Peninsula Health District has already done work to meet the needs of non-Hispanic linguistic minorities: substantial numbers of Burmese and French speaking patients were reported, among others. It is recommended that Peninsula Health District continue to identify specific non-Spanish speaking LEP populations and target these groups for health department outreach. Doing so will help to assure that the district meets the needs of all its potential LEP patients.