

Substance Abuse Prevention and Control
2024-25 Payment Reform Capacity Building and Incentive (CB&I) Initiative

Improving Workforce Language Assistance Efforts

Guidance for Developing the Language Assistance Plan (LAP)

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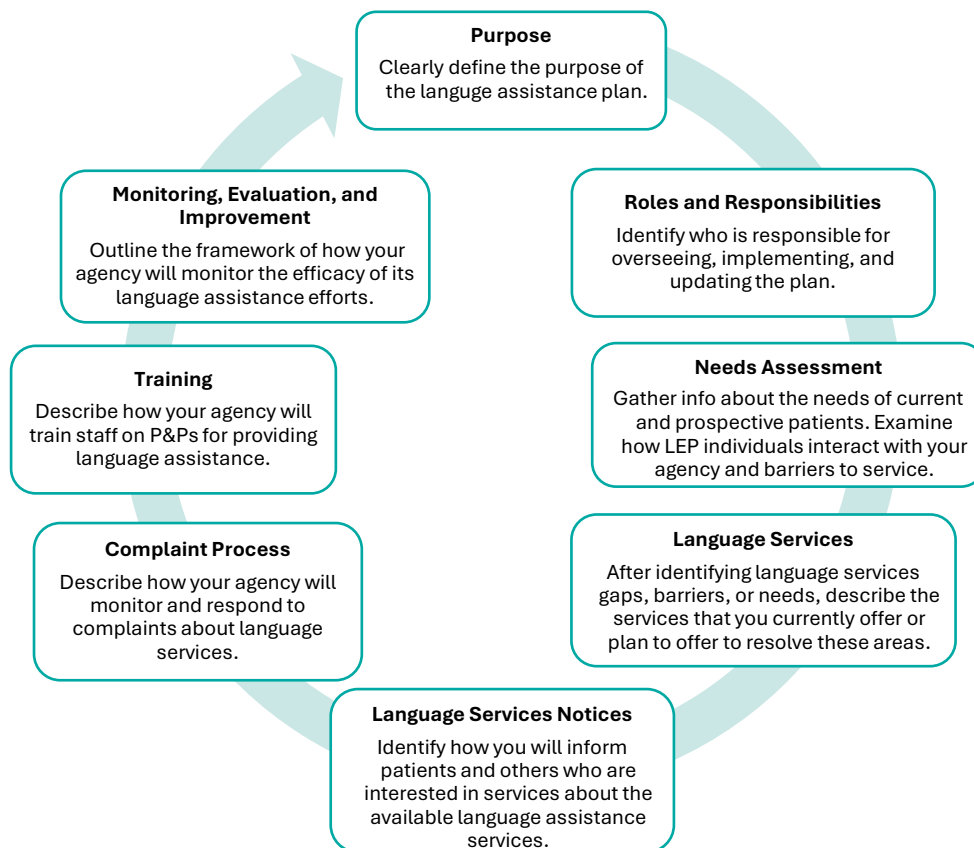
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Introduction

In Los Angeles County, 1 in 3 residents are limited-English speakers and 800,000 residents are deaf or hard of hearing. Effective communication is fundamental to engaging individuals who may not know about or believe they need substance use disorder (SUD) services. Recognizing and addressing language barriers ensures that all patients, regardless of the language they speak, receive the high-quality SUD support and care they need.

This document is designed to guide Substance Abuse Prevention and Control (SAPC) network providers in developing comprehensive and effective language access strategies that offer people with limited English proficiency and those who are deaf or hard of hearing with equal access to the benefits of SUD treatment services.

Under SAPC’s 24-25 Payment Reform Capacity Building Workforce Development initiative, Improving Workforce Language Assistance Efforts (1-I), providers will develop a Language Assistance Plan for implementation.



What is a Language Assistance Plan

Think of the language assistance plan (LAP) as a roadmap. It guides an agency and its staff on how to ensure equitable services are provided to individuals who are non-English speaking, have limited English proficiency (LEP), or are deaf or hard of hearing. It describes how the agency will meet service standards and resource needs to address language services, and outlines what all staff members need to know and do when an individual with language assistance needs engages with your agency for services. Each section in the LAP builds on the other, starting with defining your purpose and moving to monitoring, evaluation and improvement.

How to Use This Guide

1. **Review Each Section Thoroughly:** This will provide a clear framework for developing your LAP and help in better understanding how the components of each section impact the whole.
2. **Customize to Your Agency's Needs:** While there are some specific guidelines that SAPC has included in the LAP template, providers are encouraged to adapt the **non-required language** to fit the specific context and requirements of your agency. Consider the unique demographics and language needs of your surrounding community and patient population.
3. **Engage Stakeholders:** Involve key personnel, including intake and reception staff, counselors, and patient representatives, in the planning process to ensure the LAP is comprehensive and has staff buy-in.
4. **Implement the Plan:** Use the Language Assistance Plan Template to establish or enhance your language access services. Ensure that all staff members are aware of their roles and responsibilities within the plan.
5. **Train Your Staff:** Conduct training sessions based on the Staff Training section to equip your team with the necessary skills and knowledge to effectively utilize language services.
6. **Monitor and Evaluate Annually:** Your needs may change over time as your agency or the population it serves changes. Establish a routine for evaluating the effectiveness of your Language Assistance Plan. Use feedback and data to make informed adjustments and improvements. 4

Example Language Assistance Plans

For examples of Language Assistance Plans, refer to the sample plans provided below. Please note that some of the plans are robust. Not all sections in the samples may be applicable to your organization. However, they can be used as a guide for the type of information to include in your agency's LAP.

- [California Department of State Hospitals Language Access Plan](#)
- [DPSS Language Access Plan](#)
- [SAMHSA's Language Access Plan](#)

Guidance for Language Assistance Plan (LAP)

Review the sections below for a description of the information to include in each section of the LAP. Use the guide to complete the Language Assistance Plan Template. Within the template, you may choose to apply your agency letterhead or other branding, but you must maintain the format and required content of the template.

Introduction:

Introduce your Language Assistance Plan (LAP) by including your organizational background. The template includes some suggested language. Providers should also describe why the language assistance plan is important and what you hope to solve with the plan.

For agencies with more than one site location, use the table included to list the site locations that the language assistance plan applies to (agencies with three or more sites should, at minimum, include three sites). The sites selected should be those with the highest need or projected highest need for language assistance services.

Section 1. Purpose and Policy Statement

For this FY24-25 CB&I effort send an attachment of your Language Assistance Service P & P when you submit your Language Assistance Plan.

A. Purpose

The template includes some SAPC-required and recommended language for the purpose.

Providers may include additional agency-specific content to further define their purpose, focusing on ensuring equal access to services for individuals who are non-English speaking, have limited English proficiency, and those who are deaf and hard of hearing.

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B. Policy Statement

The template includes some SAPC-required and recommended language for the policy statement on language assistance services. Agencies can add additional content as applicable to their operational requirements.

Section 2. Definitions

The template includes SAPC-required definitions for the common terminology used in the language assistance plan. Providers may include definitions of additional terminology used in your language assistance plan but cannot change or remove the required content in the template.

Resource:

Additional definitions related to language access can be found in SAPC Information Notice 24-02: <http://publichealth.lacounty.gov/sapc/bulletins/START-ODS/24-02/SAPC-IN-24-02-Requirements-for-Ensuring-Culturally-and-Linguistically-Appropriate-Service.pdf>

Section 3. Implementation and Responsibilities

The template includes some SAPC-required language that recommends what to include in the accompanying table regarding identifying staff position(s) or committee responsible for overseeing the LAP and implementation of language access services, including policy and procedure directives, developing and modifying the language access plan, and establishing and implementing operational procedures.

Example of Responsibilities Include:

- **Language Access Coordinator:** The Language Access Coordinator is tasked with oversight of the department's language services. Their responsibilities include regular reviews of the departmental language access request processes, document management strategies, coordination, monitoring and overseeing language access services for the department.

Section 4. Needs Assessment

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The needs assessment is the first step in developing a language assistance plan. It helps an agency gather information about the language needs of current and prospective patients, develop a plan to address those needs, and determine what additional outreach and engagement activities may be

necessary to better support awareness of services in the surrounding community. The assessment also helps the agency to determine if it is communicating effectively with LEP individuals.

The Language Assistance Plan needs assessment may include the following information:

- Basic demographic profile of agency and surrounding community.
- The non-English languages spoken in your surrounding community.
- The non-English languages spoken by your current patient population.
- The proportion of LEP individuals in your community and in your current patient population.
- Identification of local organizations and community groups that serve LEP individuals to improve access to services and increase engagement by building trust in the community.
- How do patients with language assistance needs access and interact with your services?
- The primary first points of contact (phone calls, in-person, website, etc.) for non-English speaking or LEP individuals to help you determine where you may need to bolster language assistance.
- How do the current internal and community needs compare with the agency’s current ability to serve?
- Identification of potential points of referral, where applicable.
- Language resources and services available to LEP individuals.
- Resources required for language assistance services.

The template includes specific focus areas that must be addressed in the needs assessment.

Providers may also refer to the following two documents for assistance with completing the needs assessment: *“Prompts for Language Assistance Needs Assessment”* and *“Guidance for Implementing a Needs Assessment”* in the LAP Toolkit.

Resources

You can use the following resources to access information about the languages spoken in your community. Combine this information with data from your agency census to assess the language needs in your community.

- **LA County "hot spot" maps of Languages Spoken at Home:**
<http://publichealth.lacounty.gov/sapc/docs/providers/data/LAC-Threshold-Language-Hot-Spot-Areas-Maps.pdf>
- **Community Profiles & District Maps Catalog:**
<https://experience.arcgis.com/experience/f6e41347adf541f8a77cc6f3ae979df9>

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- **US Census Data:**
 - **American Community Survey:**
<https://data.census.gov/table/ACSST1Y2023.S1602?q=language%20spoken%20at%20home>
 - **City Profiles:**
<https://data.census.gov/profile?q=Language%20Spoken%20at%20Home&g=050XX00US06037>

Section 5. Efforts to Improve Language Assistance Services

After identifying barriers or gaps in service through the needs assessment, describe the language services your organization provides or will provide to reduce barriers to individuals who are non-English speaking, LEP, and deaf or hard of hearing. This may include services such as in-person interpretation, remote/video interpretation, translation of documents, the use of hearing-assistive technology, captioning, or voice-to-text services.

The template includes a SAPC-required implementation table and some required language, most of which are taken from bulletins or are federal, State, or local regulations. Providers should include additional agency-specific content, where indicated.

Each key area under this section (except “Identifying the Preferred Language”) includes a separate implementation table to assist providers in outlining their intentions around language assistance service implementation.

For each Language Services timeline column, select when you intend to complete the activity by clicking on the appropriate fiscal year (FY) and quarter.

The template is divided into the following four (4) key areas:

- **Reaching out to the Community:**
Outlines provider efforts to engage the surrounding and other community stakeholders, and/or faith-based organizations, etc. to increase engagement in services for non-English speaking or LEP individuals with SUD.

Use the table in the template to provide information on the types of community engagement activities that your agency currently conducts and/or plans to conduct.

Select the appropriate information for each community activity:

- Status: Select in the drop-down menu whether the community engagement activity is currently being conducted or planned.
 - Timeline: When a community activity is planned, select the FY and quarter that you anticipate starting.
- **Identifying the Preferred Language**
Outlines how patients needing language assistance services will be identified by staff and provides guidance on required documentation.
 - **Providing Language Assistance Services:**
Outlines how the agency will arrange for language assistance services, including identification of type of language assistance services needed (e.g., auxiliary aids, interpretation, bilingual staff, etc.), how to secure language assistance services, information on when services are available (by request, certain days/times, on demand, etc.), and how interpreters are selected, trained, and certified.
Use the table in the template to provide information on the types of language assistance services your agency does or plans to provide:
 - Certified Bilingual Staff for Direct Services,
 - Bilingual staff to assist with screening or other noon-counseling services,
 - Qualified Interpreters (in-person/virtual)
 - Qualified Interpreter (telephone)
 - Auxiliary Aids & Services

Select the appropriate information for each type of language assistance service:

- Language: Insert the language(s) or aids(s) for each type of service. There is space for three languages.
- Availability/Status: Select whether that language or aid exists now or is planned for the future.
- Timeline: When a language service is planned, select the FY and quarter that you anticipate its availability.

- **Translation of Written Materials:**

Outlines what critical informing documents are available in which languages, how to access the translated documents, what additional documents may be available for translation, the process for conducting translation and how to ensure translation accuracy.

SAPC provides standardized critical informing documents translated in all threshold languages. For other critical informing documents, please use the table to provide information on the types of critical informing documents and other documents your agency currently has available or plans to have available.

For each critical informing document listed

- **Language:** Insert the language(s) or aids(s) for each type of service. There is space for three languages.
- **Availability/Status:** Select whether that language or aid exists now or is planned for the future.
- **Timeline:** When a language service is planned, select the FY and quarter that you anticipate its availability.

Resource

What's in a Word: A Guide to Understanding Interpreting and Translation in Health Care:
http://www.ncihc.org/assets/documents/publications/Whats_in_a_Word_Guide.pdf

Section 6. Notice of Language Assistance Services

The template includes SAPC-required and recommended language notices, most of which are taken from federal, State, or local requirements in an effort to inform current and prospective patients who may need to utilize language services about the availability of these services.

Providers should include additional agency-specific content such as: “I speak” cards, language taglines, and signage posted in your agency.

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Resource

Translated Templates - Notice of Availability of Language Assistance: <https://www.hhs.gov/civil-rights/for-individuals/section-1557/translated-resources/index.html>)

Section 7. Complaint Process

The template includes **SAPC-required and recommended language** to describe the process for patients to submit a complaint about language access services. Providers may include additional information on their agency-specific complaint process, as needed.

Section 8. Staff Training

Describe how your agency will incorporate training new and existing staff (including refresher training and how often your agency will train staff on policies and procedures for providing language assistance. This section can also include a description of training needs and how they will be addressed.

All employees should be aware of your language access policies and procedures and how to access interpretation or translation services when needed. Those who interact directly with patients should be trained to work with interpreters as well as how to communicate effectively and respectfully with LEP individuals. It is important that all staff members receive refresher training as policies, procedures, and resources are improved to meet the evolving needs of the agency and its patients.

The template includes a SAPC-required implementation table for when your agency plans to provide staff training.

Use the table to provide information on the staff language assistance services training that your agency currently conducts and/or plans to conduct.

Select the appropriate information for each community activity:

- Timeline: Select the FY and quarter that you anticipate starting.

Section 9. Monitoring, Evaluation, and Continuous Improvement

For language access services to continue to be effective, an agency must monitor, evaluate, and update the plan, policies, and procedures.

The template includes SAPC-required and recommended language that outlines activities your agency conducts related to monitoring and future plans to improve the efficacy of its language assistance efforts, including how this information will be used to update your language assistance plan, and policies and procedures to ensure that your goals of improving access to non-English speaking, LEP, and deaf or hard of hearing individuals are being met.

Identify who is responsible for monitoring and evaluation and clearly define roles. If your agency has a language access coordinator/team or someone with a similar job description, outline what their role and responsibilities are and what resources are available to support them in the monitoring and evaluation efforts.

Monitoring and evaluating language assistance services include conducting the below activities on a regular basis. Not all of these tasks are required as part of this LAP, but should be included as part of the LAP implementation planning:

- Tracking the use of language assistance services, including inputs onto CalOMS.
- Surveying staff on the use of language assistance services and suggestions for improvements.
- Surveying LEP patients about their experience accessing and engaging with services, and additional language service needs.
- Identifying when staff are not following the language assistance protocols.
- A description of how the organization will stay up to date on languages spoken by LEP individuals who seek services at your agency and community demographics.
- A description of how complaints and suggestions by LEP individuals will be monitored and incorporated into improving the process.
- A description of how information from the needs assessment and utilization rates will be used to inform and improve P&Ps.

Use the table in the template to provide information on relevant monitoring/evaluation/continuous 13 improvement activities that your agency currently conducts and/or plans to conduct. Providers can include additional activities that they currently or plan to provide.