



Virginia Department of Corrections

Offender Management and Programs

Operating Procedure 801.7

Language Services for Limited English Proficiency

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REVIEW

The Content Owner will review this operating procedure annually and re-write it no later than three years after the effective date.

COMPLIANCE

This operating procedure applies to all units operated by the Virginia Department of Corrections (DOC). Practices and procedures must comply with applicable State and Federal laws and regulations, American Correctional Association (ACA) standards, Prison Rape Elimination Act (PREA) standards, and DOC directives and operating procedures.

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DEFINITIONS

Bilingual - The ability to speak two languages fluently and to communicate directly and accurately in both English and another language

Conditions of Supervision - A document that details the rules a probationer/parolee must abide by in order to complete supervision successfully.

Direct Communication - Monolingual communication in a language other than English between a qualified bilingual employee or other bilingual person and an LEP inmate or probationer/parolee, e.g., Spanish to Spanish

Effective Communication - Communication sufficient to provide an LEP individual with the same level of services received by an individual who is not LEP

Essential Documents – Documents, including those described in *Written Language Services*, which contain essential information about available programs, services, benefits, or activities, access to which is essential to receive them, benefit from them, or participate meaningfully in them.

Interpretation - The verbal conversion of words from one language to another language while retaining the same meaning; interpreting is a sophisticated skill needing practice and training and should not be confused with bilingualism.

Language Identification Tool - A card, poster, or auditory recording used to identify an inmate's/probationer's/parolee's primary language and to determine the need for services in a particular language; these identification tools are to be evaluated and should be updated in order to ensure their efficacy for all LEP individuals

Limited English Proficiency (LEP) Inmates and Probationers/Parolees - Individuals whose primary language is not English and who have a limited ability to read, write, speak or understand English.

Meaningful Access - Language assistance that results in accurate, timely, and effective communication at no cost to the LEP inmate and probationer/parolee; meaningful access denotes access that is not significantly restricted, delayed or inferior as compared to programs or activities provided to English proficient individuals.

Non-Qualified Interpreters and Translators – Interpreters and translators who are not designated as “Qualified Bilingual Employee” by the LEP Coordinator or are not provided by the DOC Language Services Contract which can include, but is not limited to, inmates, probationers, parolees, family, and friends.

Primary Language - The language in which an individual is most effectively able to communicate.

Programs and Activities - Any programmatic activity or assignment that is funded with federal or state monies and conducted or sanctioned by the DOC.

Qualified Bilingual Employee - An employee who has been determined by the LEP Coordinator to be fluent in English and at least one other language; qualified bilingual employees are sufficiently fluent in the LEP inmate's or probationer's/parolee's primary language and are able to convey complex instructions in that language. The ability to hold basic conversations in an LEP inmate's or probationer's/parolee's primary language is insufficient to qualify an employee as a bilingual employee. A qualified bilingual employee is not equivalent to a qualified interpreter or qualified translator, as defined below.

Qualified Interpreter - An in-house or DOC Language Services contracted individual who is able to ensure effective communication through accurate interpretation from English to the other language being interpreted, as determined by testing or certification protocols established by the LEP Coordinator.

Qualified Translator - An in-house or DOC Language Services contracted individual who is able to provide accurate translation of documents from English to another language, as determined by testing or certification protocols established by the LEP Coordinator.

Regularly Encountered Language - Any language spoken by at least 5% of the inmate or probationer/parolee population at the facility/office

Special Needs: LEP Alert - A custom alert in VACORIS that can be used to identify LEP inmates and probationers/parolees and their primary language.



Translation - The replacement of written text from one language, source language, into an equivalent written text in another language, target language; translation requires special knowledge and skills beyond bilingualism.



PURPOSE

This operating procedure provides for the identification, assessment, and provision of translation and interpretation services for Limited English Proficient (LEP) inmates and probationers/parolees.

PROCEDURE

- I. Limited English Proficiency Services
 - A. The DOC will take reasonable steps to provide LEP inmates and probationers/parolees with meaningful access to DOC facilities, services, programs, and activities to ensure that language does not prevent employees from communicating effectively with LEP inmates and probationers/parolees.
 1. An LEP inmate or probationer/parolee may be proficient in certain types of communication, e.g., speaking or understanding but still be LEP in other types of communication, e.g., reading or writing.
 2. LEP designations are context specific; an inmate or probationer/parolee may possess sufficient English language skills to function in one setting, e.g., casual conversation, but these skills may be insufficient in other situations, e.g., medical evaluations.
 - B. An inmate's or probationer's/parolee's LEP status must not prevent them from accessing vital services such as programs and information, understanding rules, participating in proceedings, gaining eligibility for parole, probation, treatment and education programs, and classification assignments.
 - C. Employees must ensure that LEP inmates and probationers/parolees are not penalized, or their rights adversely affected due to a lack of language assistance.
 1. A lack of language assistance must not negatively impact the length of an LEP inmate's or probationer's/parolee's incarceration, facility assignment, post release status, supervision, or classification.
 2. Employees must not discipline inmates and probationers/parolees for failing to obey a command when their failure is due to a lack of free language assistance.
 - D. Employees have access to various internal and external sources that are available to provide verbal and written language assistance to LEP inmates and probationers/parolees at intake into the DOC. (5-ACI-6A-01)
 1. Employees must provide inmates and probationers/parolees with verbal and written language assistance in the areas of treatment and education programming, safety, medical, mental health, grievance, and proceedings such as disciplinary and classification at no cost to the inmate or probationer/parolee.
 2. Interpretation services must be provided to an inmate or probationer/parolee using one of the following methods:
 - a. In-person/on-site
 - b. Over the telephone
 - c. Through video conferencing
 - d. Through DOC approved electronic communication devices
 - E. Employees should avoid assumptions about an inmate's or probationer's/parolee's primary language. An employee cannot assume an individual's primary language is English based solely on an inmate's or probationer's/parolee's ability to speak English fluently e.g., inmates and probationers/parolees from Central America do not always speak Spanish fluently.
 1. Employees will make every effort to determine an individual's primary language using a language identification tool that is accessible to people with a range of oral communication and literacy levels; see Attachment 2, *Language Identification Tool*.



2. Employees must provide public notice of LEP services, and these notices must be posted in inmate and probationer/parolee accessible areas; see Attachment 2, *Language Identification Tool*.
 3. LEP inmates may request to have their LEP status printed on the front of their Inmate Identification Card and list their primary language on the back of the ID. Inmates may also request to have a language designation placed on their cell door.
 4. At their request, LEP probationers/parolees should be provided an “I Speak” card to assist employees in identifying the LEP inmate’s or probationer’s/parolee’s primary language for both oral and written communication; see Attachment 1, *“I Speak” Card*.
- F. Employees must provide inmates and probationers/parolees with information on available language assistance services:
1. At intake into the DOC from a jail or non-DOC facility.
 2. Upon transfer to another DOC facility.
 3. During facility orientation, see Operating Procedure 810.1, *Inmate Reception and Classification*, Operating Procedure 810.2, *Transferred Inmate Receiving and Orientation*, and Operating Procedure 940.4, *Community Corrections Alternative Program*.
 - a. Information on qualified interpretation services must be included in all inmate and probationer/parolee orientation manuals, packets, and materials.
 - b. Employees conducting orientation must provide inmates and probationers/parolees with written orientation materials translated into their primary language. (5-ACI-5A-04; 4-ACRS-3A-05)
 4. During the initial contact for probationers/parolees on supervision, see Operating Procedure 920.1, *Community Case Opening, Supervision, and Transfer*.
 5. Prior to all classification and disciplinary hearings, see Operating Procedure 830.1, *Institution Classification Management*, Operating Procedure 861.1, *Inmate Discipline*, and Operating Procedure 940.4, *Community Corrections Alternative Program*.
- G. Language services for all contacts that occur prior to sentencing such as the preparation of a *Pre-Sentence Investigation Report* will be facilitated through the court when available i.e., a court-ordered interpreter.
- H. Employees must provide language assistance services when requested by an inmate or probationer/parolee whether the request is written or verbal.
1. Employees may be required to use interpretation or translation services to process such a request.
 2. For inmates and probationers/parolees designated as LEP, employees must provide language services for vital services without requiring the inmate or probationer/parolee to request language services.
- I. Employees are prohibited from retaliating against inmates and probationers/parolees requesting language assistance services, filing a verbal or written complaint, or submitting a grievance related to language assistance services.

II. LEP Coordinator and Monitors

- A. The Director will designate an LEP Coordinator responsible for overseeing and directing language services for inmates and probationers/parolees, including the development and management of applicable contracts, documents, and resources. The LEP Coordinator must:
1. Coordinate language assistance services with facility and office LEP Monitors. These vital services include but will not be limited to the following:
 - a. Academic, Job Training, and Cognitive Programming
 - b. Substance Use Treatment and Testing
 - c. Mandatory Programming or Programming that Impacts Term of Incarceration/Supervision
 - d. Classification/ICA Hearings



- e. Disciplinary Hearings
 - f. Medical Assessments and Treatment
 - g. Mental Health Assessments and Treatment
 - h. Visitation
 - i. Court Hearings, as requested by the Court
 - j. Job/Program Assignments and Pay Levels
 - k. PREA Screening, Orientation, and Education
 - l. Filing of Inmate Grievances, including Informal Complaints
2. Coordinate the identification of language service needs in the DOC and strategies for responding to those needs.
 3. Serve as the contract administrator for all DOC language services contracts for interpreter/translator services.
 4. Identify, in coordination with facility or office LEP Monitors, the regularly encountered languages of the inmates or probationers/parolees of that facility or office.
 5. Translate the general *Conditions of Supervision* and all intake documents to the language spoken by the probationer/parolee and provide the probationer/parolee a printed copy. (4-APPFS-2B-01)
 - a. Probationers/parolees are required to sign the conditions, indicating their understanding and a willingness to comply with them.
 - b. If a communication problem such as illiteracy or a foreign language prevents a probationer/parolee from understanding the conditions, the P&P Officer must assist in explaining the conditions.
 6. Maintain a directory of all qualified bilingual employees throughout the DOC, including the non-English languages they speak and their contact information, work location, assignments, and shifts.
 7. Ensure that the current inmate and probationer/parolee verbal and written language services needs are identified and the resources to address these needs are secured.
 8. Identify the criteria to be used when initially designating the languages for translations based on demographic data and usage projections.
 9. Maintain DOC data, in coordination with the LEP Monitor and the language services vendor, on the number of, and selected interactions with, LEP inmates and probationers/parolees and provide information, as requested, to the Director.
 10. Develop and maintain systems to ensure that all employees and members of Senior Leadership are aware of the inmates and probationers/parolees who require language assistance services and coordinate with the facility and office LEP Monitors to implement those systems.
 11. Review essential documents to determine translation requirements.
 12. Develop a system to distribute translated documents to all facilities and offices, post translated documents electronically, and maintain an adequate supply as needed for distribution.
 13. Identify the training needs and provide this training to LEP Monitors, facility and office employees and supervisors who require access to language services and language service providers.
 14. Establish protocols for ensuring quality, timely, cost-effective, and appropriate levels of confidentiality in translations, interpretation, and bilingual employee communications.
 15. Exchange information on promising practices with other departments and among facilities and offices.
 16. Establish a system to coordinate with the courts and jails to identify and respond to inmate and probationer/parolee language needs as early as possible.
 17. Review the DOC's progress towards:
 - a. Providing LEP inmates and probationer/parolees with meaningful access to services, activities, and



- programs;
 - b. Developing reports; and
 - c. Revising operating procedures and DOC practices when appropriate.
18. Maintain and make available statewide a directory, organized by language and by location, that provides information gathered from Human Resources on DOC employees who are qualified interpreters or translators.
19. Convene annual meetings with facility and office LEP Monitors to develop, implement, and evaluate the requirements of this operating procedure.
- B. Each Facility Unit Head and P&P Chief will designate a facility or office LEP Monitor as appropriate. The LEP Monitor for each facility and office will:
- 1. Work with the LEP Coordinator to identify the LEP needs for the facility or office and the strategies for meeting those needs.
 - 2. Identify all regularly encountered languages spoken by at least 5% of the inmates or probationers/parolees in that facility or under supervision of that office.
 - 3. Ensure facility and office employees are trained on and compliant with this operating procedure, including updates from memorandums and amendments.
 - 4. Establish and maintain an accurate and up to date language assistance resource list specific to the facility or office. Ensure all employees, inmates, and probationers/parolees are made aware of the list and how to access the resources.
 - 5. Create and maintain a facility or office-specific directory of all qualified bilingual employees that includes a list of the non-English language(s) they speak and their contact information, assignments, and shifts.
 - 6. Submit the facility or office directory to the LEP Coordinator and employees on a quarterly basis.
 - 7. Ensure posting of the language identification tool, completion of assessments, data entry into VACORIS, and the distribution of "I speak" cards as shown on Attachment 1, "*I Speak*" Card.

III. LEP Needs Assessment

A. Intake

- 1. As a part of the intake process, an employee will assess all inmates and probationers/parolees to determine any language assistance needs.
- 2. Employees must determine:
 - a. Whether the inmate or probationer/parolee has language preference(s) for oral or written communication
 - b. If the individual's primary oral communication language and primary written communication language is English or if it is another language
- 3. An inmate or probationer/parolee will be considered LEP if:
 - a. The inmate or probationer/parolee states or indicates they cannot effectively communicate in English.
 - b. An employee discerns that the inmate or probationer/parolee is not English proficient based on an interaction or multiple interactions with them.
 - c. The inmate or probationer/parolee was provided an interpreter at a court hearing or proceeding.
 - d. A Comprehensive Adult Student Assessment Systems (CASAS) determines the inmate's or probationer's/parolee's proficiency.
- 4. When the inmate's or probationer's/parolee's primary or preferred language(s) for oral and written communication is not English, employees must utilize a qualified interpreter to engage in meaningful

conversation with them.

B. During Incarceration or CCAP Assignment

1. Inmates and CCAP probationers/parolees who listed English as their primary language for oral or written communications may still need language services assistance if the inmate or probationer/parolee did not initially report their LEP status due to:
 - a. Immigration issues
 - b. Fear of retaliation
 - c. A misunderstanding
 - d. English proficiency deteriorated over time
2. When an employee reasonably believes that an inmate or probationer/parolee whose primary language for oral or written communications is documented as English has difficulty understanding instructions, operating procedures, or other oral and written information in English, the employee must notify the LEP Monitor of their concerns.

C. Documentation

1. Employees must document the inmate's or probationer's/parolee's primary language for oral and written communications in VACORIS and select the *Non-English-Speaking* checkbox on the demographics screen.
2. The Counselor or P&P Officer, with assistance from the LEP Monitor, if necessary, must place a Special Needs: LEP alert on every LEP inmate or probationer/parolee assigned to their caseload.
3. When an inmate's or probationer's/parolee's LEP status affects their ability to communicate, Healthcare employees must note the inmate's or probationer's/parolee's LEP status on their Health Record.
4. An employee must note the inmate's or CCAP probationer's/parolee's LEP Status at the time the record is established or as soon as possible based on:
 - a. Employee interaction with the inmate or probationer/parolee; or
 - b. The LEP status as documented on the demographics screen or in the alert section of VACORIS.
5. LEP Monitors will run a VACORIS report, on a quarterly basis, for Non-English-Speaking inmates and probationers/parolee to determine the most encountered languages at their site.

IV. Qualified Interpreters and Translators

- A. The LEP Coordinator will develop the testing and certification protocols required to designate an individual as a qualified interpreter or a qualified translator.
- B. Qualified Interpreters and Qualified Translators must:
 1. Understand and follow relevant DOC rules, such as those governing confidential information, sensitive information, and facility rules that apply to all DOC employees.
 2. Adhere to applicable interpreter ethical standards governing confidentiality, accuracy, impartiality, conflicts of interest, and maintaining a professional distance.
- C. Qualified interpreters and qualified translators must be provided at no cost to the LEP inmate or probationer/parolee.

V. Qualified Bilingual Employees

- A. In coordination with Human Resources, the LEP Coordinator must determine the appropriate manner for designating a new or existing DOC employee as a qualified bilingual.
- B. A qualified bilingual employee should not be considered equivalent to or interchangeable with a qualified



interpreter or qualified translator.

1. Apart from sensitive or confidential communications, for which a qualified interpreter must be used, qualified bilingual employees are authorized to provide direct communication, whenever possible, with LEP inmates and probationers/parolees.
2. When a qualified bilingual employee is not available and a non-qualified bilingual employee lacks the skill to provide direct communication services, a qualified interpreter provided by the DOC contract vendor must be used to communicate with an LEP inmate or probationer/parolee.

VI. Non-Qualified Interpreters and Translators

- A. Non-qualified interpreters and translators are any individuals other than qualified bilingual employees, qualified interpreters, and qualified translators.
- B. Non-qualified interpreters and translators can include, but are not limited to, employees, volunteers, inmates, probationers/parolees, and the family and friends of probations/parolees.
- C. Non-qualified interpreters may provide language assistance during informal communications that do not involve the provision of necessary services or the exchange of confidential or sensitive information. A qualified interpreter must provide language assistance for all other services.
- D. Employees should direct all questions regarding the use of non-qualified interpreters and translators for inmate and probationer/parolee programs and services to the LEP Coordinator.

VII. Verbal Language Services

- A. Employees in coordination with the LEP Monitor will use the information available in VACORIS to determine the primary or dominant language of an LEP inmate or probationer/parolee.
- B. Employees must provide LEP inmates and CCAP probationers/parolees with language interpretation services during the following interactions:
 1. Investigations or questioning
 2. Intake and reception into the DOC
 3. Transfer into each DOC facility
 4. Medical and mental health interactions
 5. Orientation
 6. Inmate grievances
 7. Disciplinary hearings
 8. Education/programming
 9. Housing assignments
 10. Court appearances
 11. Parole hearings
- C. Regardless of LEP status, inmates and probationers/parolees may request interpreter services by making a verbal request to any employee or the LEP Monitor or by submitting an *Interpreter Services Request* 801_F12. Non-emergency interpreter assistance must be provided within 48 hours of the request.
- D. Employees must provide a qualified interpreter for all sensitive, confidential, or privileged communication.
- E. Employees must use the DOC language services contract when a qualified bilingual employee is not available. Use of the internet and machine translations such as Babelfish, Google Translate, etc. is prohibited.



F. Temporary and Emergency Situations

1. Employees must use a qualified interpreter provided by the DOC language services contract in all verbal and written communications related to a PREA incident.
2. During unforeseen emergency situations involving communications for which a qualified interpreter would normally be required, an employee may use any available resource, including a qualified bilingual employee, to provide direct and essential communication while awaiting the availability of a qualified interpreter.

VIII. Written Language Services

- A. The LEP Coordinator and facility or office LEP Monitor will coordinate translation services. Employees must adhere to the following process for document translations:
 1. Official translation requests must be submitted to the LEP Monitor who will forward the request to the LEP Coordinator. If the request is granted, translation services must be provided free of charge.
 2. The LEP Coordinator will contact the LEP Monitor and if approved, the LEP Coordinator will submit the document to the DOC language services contract vendor for translation, or the LEP Coordinator may direct the facility or office employee to submit the document for translation to the contract vendor.
 3. Plain language should be used in the translation of materials to ensure the materials are accessible to readers in a range of literacy levels.
 4. If an LEP inmate or probationer/parolee requests an oral interpretation, or if verbal communication of translated material is preferred, e.g., because of reading level limitations, employees must provide an interpreter in accordance with the requirements of this operating procedure.
- B. Any inmate or probationer/parolee may request translation services by making a verbal request to any employee or the LEP Monitor. Non-emergency translator assistance should be provided within 48 hours.
- C. The DOC will provide a translated version of all documents designated essential by the LEP Coordinator into the regularly encountered languages of inmates and probationers/parolees.
 1. All essential documents, including but not limited to the following, must be translated at no cost to the LEP inmate or probationer/parolee:
 - a. Inmate and probationer/parolee consent forms
 - b. Informal complaint or grievance forms, determinations on informal complaints, grievances, or appeals
 - c. Intake forms requesting vital information, e.g., mental health screening form, emergency contact list
 - d. Written notices of rights, denials, loss, or decreases in benefits or services, parole, and disciplinary or classification hearings
 - e. Notices to inmates and probationers/parolees regarding their rights and the procedures related to the PREA protections
 - f. Notices of disciplinary actions
 - g. Notices posted for religious and recreational activities
 - h. Notices advising LEP inmates and probationers/parolees of free language assistance
 - i. Facility rule books
 - j. Medical forms, notices, procedures, diagnoses, conclusions, and instructions
 - k. Refusal forms
 - l. Written tests that do not assess English language competency, but test competency for a particular license, job, or skill for which knowing English is not required
 - m. Applications to participate in a DOC program or activity or to receive DOC benefits or services

2. For an LEP inmate or probationer/parolee whose primary language is not a regularly encountered language, employees, to the extent possible, must obtain a translation of each essential document into the inmate's or probationer's/parolee's primary language.
 - a. The LEP Coordinator will review all DOC documents to determine what documents are essential based on the nature, frequency, importance, and relevance to inmates and probationers/parolees.
 - b. For facility and office-specific documents, the LEP Monitor will conduct a preliminary review and send their recommendation to the LEP Coordinator.
 - i. The LEP Coordinator will review and determine whether the facility or office specific document will be designated as an essential document for that facility or office.
 - ii. The LEP Monitor must ensure all translated facility and office specific documents are available to all employees e.g., stored in a shared folder.
- D. When the translation of a non-essential document is not possible or reasonable, a qualified bilingual employee or a DOC language services contract interpreter must convey vital information verbally in the relevant language.
- E. The Facility Unit Head, Chief P&P Officer, or a designee must ensure that written information communicated in English to all inmates in a facility or to all probationers/parolees under the supervision of an office is also provided in all regularly encountered languages.

IX. Confidential and Sensitive Communications

- A. Employees must use a qualified interpreter or a qualified translator for communications that involve sensitive, confidential, or privileged information, or when interpretation by a qualified bilingual employee could create a conflict of interest.
 1. Confidential and sensitive communication includes, but will not be limited to classification reviews, disciplinary hearings, institutional reviews, medical or mental health encounters, investigations, community corrections case openings or any subsequent meetings that effect supervision, and PREA allegations or investigations.
 2. Reliance on non-qualified interpreters could result in a breach of confidentiality, a conflict of interest, or an inadequate interpretation or translation.
 3. This prohibition does not apply during emergency situations where an extended delay in obtaining qualified interpretation services could compromise an inmate's or probationer's/parolee's health or safety.
- B. All privileged or confidential information obtained while providing language assistance services must only be disclosed to authorized persons.
 1. Authorized recipients of an inmate's or probationer's/parolee's health information must adhere to all applicable provisions of the *Health Insurance Portability and Accountability Act (HIPAA)*, the *Health Information Technology for Economic and Clinical Health (HITECH) Act*, other applicable legal requirements, and applicable professional licensure requirements.
 2. When the DOC utilizes an external interpreter or translator, the interpreter and translator are also subject to any applicable provisions of the HIPAA and HITECH Act requirements.
- C. Employees are prohibited from translating the content of an inmate's or probationer's/parolee's legal documents.
 1. When an LEP inmate or probationer/parolee requests the translation of their legal documents, an employee or contract employee, as appropriate, will use the *Notice of Significant Legal Document 801_F11*, identifying only the title or nature of the legal notice to request a translation.
 2. Employees must use the DOC Language Services Contract to provide interpreters and translators who can assist the inmate or probationer/parolee by translating the document, either verbally or in writing.

- a. If the inmate or probationer/parolee is requesting a verbal interpretation on the *Notice of Significant Legal Document* 801_F11, an employee must arrange for translation services to occur in a setting appropriate for confidential legal communications.
- b. The contact information for the language services vendor must be included in the *Notice of Significant Legal Document* 801_F11.

D. Non-medical employees or other inmates and probationers/parolee are not permitted to interpret or translate any medical information to an LEP inmate or probationer/parolee patient.

X. Language Assistance Grievances

- A. The LEP Coordinator, in cooperation with LEP Monitors, must ensure inmates and probationers/parolees are notified of their right to file a complaint regarding their access to language services.
- B. Inmates are not required to use the informal complaint process; employees are permitted to resolve the inmate's complaint on access to language services.
- C. Employees must accept all inmate and probationer/parolee complaints concerning language services accommodations reported through the informal complaint process.
- D. Employees must immediately report any knowledge or information received that alleges a lack of accommodations for language access or the provision of poor language services to the LEP Coordinator.
- E. Inmates can pursue an administrative remedy through the regular grievance process, see Operating Procedure 866.1, *Inmate Grievance Procedure*.
- F. Probationers/parolees housed in a CCAP facility can use the CCAP facility's complaint or grievance procedure, see Operating Procedure 940.4, *Community Corrections Alternative Program*.

XI. Training Requirements

- A. All employees must be trained in the requirements of this operating procedure to include accessing language assistance services.
- B. New employees will be trained during orientation; see Operating Procedure 102.6, *Staff Onboarding and Orientation*.
- C. Refresher training will be provided, annually, to all employees as a part of their mandated in-service training; see Operating Procedure 350.2, *Training and Development*.

REFERENCES

Department of Justice LEP Reference Guidance

Health Insurance Portability and Accountability Act (HIPAA)

Health Information Technology for Economic and Clinical Health (HITECH) Act

Operating Procedure 102.6, *Staff Onboarding and Orientation*

Operating Procedure 350.2, *Training and Development*

Operating Procedure 810.1, *Inmate Reception and Classification*

Operating Procedure 810.2, *Transferred Inmate Receiving and Orientation*

Operating Procedure 830.1, *Institution Classification Management*

Operating Procedure 861.1, *Inmate Discipline*

Operating Procedure 866.1, *Inmate Grievance Procedure*

Operating Procedure 920.1, *Community Case Opening, Supervision, and Transfer*

Operating Procedure 940.4, *Community Corrections Alternative Program*



ATTACHMENTS

Attachment 1, *“I Speak” Card*

Attachment 2, *Language Identification Tool*

FORM CITATIONS

Notice of Significant Legal Document 801_F11

Interpreter Services Request 801_F12

