Title: Funding Of Communication Supports for Consumers in County-funded Services

Policy: The Dauphin County MH/MR Program will provide funding to contracted service providers who provide communication supports such as interpreter services to consumers in need of such supports at the point of service access and during the provision of treatment and rehabilitation services when eligibility requirements have been met. All consumers should receive culturally and linguistically competent services in a manner compatible with their cultural beliefs, practices and language needs.

Definitions:

Certified Interpreter - Certified interpreters are required for legal proceedings; in other situations the standard is "qualified" (see definition below). A certified interpreter has a certification from a national certifying body. These may include but are not limited to: the national Association of the Deaf (NAI) and the Registry of Interpreters for the Deaf, Inc. (RID). A brief description of the acceptable certifications from NAD: level 4 or 5; and RIS: CI, CT, CSC, or CDI are described in Policy Number 03-03 (Attachment A to that policy). Certified interpreters have proof of certification from national certifying bodies, which includes the certification type, a date of certification and expiration or date of expiration.

Communication supports - Services and resources provided to an individual of limited English proficiency, those who are illiterate or have low literacy skills, and individuals with disabilities. These resources may include, but are not limited to: bilingual/bicultural staff, multilingual telecommunication systems, TTY, foreign language interpretation services, sign language interpretation services, print material in easy to read - low literacy picture/symbol format, assistive technology devices, computer assisted real time translation, materials in alternative formats (audiotape, Braille, enlarged print), varied approaches to share information with individuals who experience cognitive disabilities, and translation of - legally binding document (consent forms, confidentiality and patient rights statements, release of information), signage, health education materials and public awareness materials.

Culture - The aspects of identity that individuals share and which identify them as a group. To
the extent that these aspects incorporate physical attributes and group identification as a “race,”
physical attributes contribute to cultural identity. Culture incorporates the concept of
embeddedness of smaller group identities within larger groups. Cultural descriptions include,
but are not limited to characterizations of shared values, norms, traditions, customs arts, history,
folklore, religion, and healing practices and beliefs. Cultural institutions such as religious
beliefs, social organization and customs are generally transmitted to succeeding generations and
define the ethnicity of the group.

Cultural Competence - A set of congruent behaviors, attitudes and polices that come together in
a system, agency or among professionals, enabling them to work effectively in cross-cultural
situations. The word culture is used because it implies the integrated patterns of human behavior
that include thoughts, communications, actions, customs, beliefs, values and institutions of
racial, ethnic, religious or social groups. The word competence is used because it implies having
the capacity to function within the context of culturally integrated patterns of human behavior
declared by the group (OMHSAS Definition from M.R. Isaacs & M. Benjamin, 1991).

Eligibility Requirements - The Dauphin County MH/MR program will participate in the cost
of interpreter services when the mental health service being delivered is funded by the MH/MR
Program and the adult, child or adolescent consumer is registered with the CMU; or in situations
where a potential consumer requires communication supports in order to complete an intake
through the CMU to determine eligibility for MH services.

Program-Funded Invoice - The invoice form described in Dauphin County MH/MR Policy #
02-09 that is used to invoice the Dauphin County MH/MR Program for services approved for
Program Funding.

Qualified Interpreter - An interpreter who is “able to interpret effectively, accurately and
impartially both receptively and expressively, using any necessary specialized vocabulary” (28
CFR35.104; 28CFR36.104). The definition also recognizes that the interpreting skill needed for
some types of communication may be higher than for other types of communication. For
example, an interpreter in a psychiatric setting must be able to interpret complex psychiatric and
medical terminology. OMHSAS Clinical Standards define a qualified interpreters as “a person
trained in oral translation who are serves to bridge the cultural gaps arising in cross-cultural
communication. The ideal interpreter is someone who is not only trained in cross-cultural
interpretation, but also trained in the [behavioral] healthcare field, proficient in both the culture
of the consumer and that of the [behavioral] healthcare professionals. The interpreters should
have an understanding of the significance of the particular [behavioral] health matter being
discussed and must have an understanding of the importance of confidentiality.

Services Rendered Invoice (SRI) - The invoice form described in Dauphin County Policy # 02-
08 used to invoice the Dauphin County MH/MR Program for services approved on a fee for
service basis.
Procedure:

1. The CMU will complete an assessment of the individual’s communication support needs and will provide that information to the contracted service provider upon referral. If the potential consumer will need communication supports for the intake (eligibility assessment) at the CMU, the CMU follows this procedure as a contracted service provider.

2. The Dauphin County MH/MR Program expects that needs and resources will be discussed and determined through an interagency team process that supports the consumer and the consumer’s family in accessing and maintaining treatment and/or rehabilitation services that are clinically appropriate.

3. The CMU is solely responsible for making appropriate communication support assessments as a part of their base service unit functions and the provision of communication supports for carrying out their administrative or targeted case management responsibilities.

4. The contracted service provider is solely responsible for arranging communication supports with reputable, qualified interpreters.

5. The contracted service provider will accept the consumer for services and will make appropriate accommodations for assessment, treatment and rehabilitation services taking into consideration the values, preferences, and expressed needs of the consumer and according to the Dauphin County MH/MR program Policy # 03-03 “Use of Interpreters for County Funded Mental Health Services.”

6. The contracted service provider arranges for interpreter services as needed through one of the following means:
   A. Use of existing agency mental health staff member
   B. Use of subcontracting arrangement with a qualified interpreter.

7. The contracted service provider will notify the CMU case manager in writing of the interpreter arrangements made prior to the first appointment, and the provider will also send the County MH/MR Program Office a completed “Notification of Interpreter Services Form.” (Attachment A)

8. The Dauphin County MH/MR Program will use two methods to provide funding to the contracted service providers for interpreter services to consumers meeting eligibility requirements as described in the definitions section up to the availability of funds:
   A. When the rate for the treatment or rehabilitation service is set by an authority other than the Dauphin County MH/MR Program (such as CBHNP, MA Fee-for-Service, or another County), the County will fund interpreter services by program funding using existing policies and procedures on program funded costs and invoicing.
Examples of the types of services in which the rate is established by another authority include: outpatient, inpatient, targeted case management, partial hospitalization, etc.

Only costs associated with the direct service to the consumer and their family where interpreter services are required are reimbursable. Costs for staff training are the responsibility of the contracted service provider. Contracted service providers will invoice the Dauphin County MH/MR Program using the Program Funding Invoice policy and procedures. The interpreter service provider will not be expected to invoice the County MH/MR program directly.

B. When Dauphin County MH/MR Program establishes the rate for treatment and rehabilitation services through our contract development process, the County will fund interpreter services by negotiating a fee-for-service rate that incorporates the costs associated with the interpreter services to the individual. Examples of the types of services in which the Dauphin County MH/MR Program establishes the rates include: social rehabilitation, Community Residential Rehabilitation, family support services and administrative case management.

Only costs associated with the direct service to the consumer and their family where interpreter services are required are reimbursable. Costs for staff training are the responsibility to the contracted service provider. Service providers will invoice the Dauphin County MH/MR Program using the Fee-For-Service policy and procedures. The interpreter service provider will not be expected to invoice the County MH/MR program directly.

9. The Dauphin County MH/MR Program staff person responsible for specific treatment or rehabilitation services in service provider contracts will make any and all necessary changes to the provider’s contract to assure financial participation in the costs of interpreters and based on the availability of funds. All invoices for interpreter services will be directed to the Deputy MH Administrator.

10. The Dauphin County MH/MR Program staff person is responsible for assisting case managers and other service providers in using this policy and procedure and will not make any arrangements for the provision of interpreter services for or on behalf of the contracted service provider or the CMU.

11. Providers should direct questions, concerns and issues regarding the funding of interpreter services to the Dauphin County MH/MR Program staff person assigned as the service provider’s lead contract person as specified in Appendix A of the County and Provider’s contract.

Resources:

- 4300 Fiscal Regulations
- Dauphin County Policy on Use of Interpreters for County Funded Mental Health Services
- OMHSAS Cultural Competence Clinical/Rehabilitation Standards of Practice
Attachment A

Dauphin County MH/MR

Notification of Interpreter Services Form

Provider Name: ________________________________

Provider’s Dauphin County MH/MR Provider Number: ____________

Provider’s Dauphin County MH/MR Program Number: ____________

Consumer’s BSU #: ____________________________

Consumer’s Name: ______________________________

Anticipated start date of service requiring use of interpreter: ____________

Name and Title of person completing this form: ____________________________

Date Form is completed: ____________

Please mail or fax completed form to:

Dauphin County MH/MR
Fiscal Department
100 Chestnut Street, First Floor
Harrisburg, PA 17101

Fax # 780-7061

Policy # 04-02 Notification of Interpreter Services Form