I. PURPOSE:
To establish policy and procedure to assure accommodations in the areas of limited English proficiency, diverse ethnic and cultural backgrounds, communication impairments, visual impairments, and mobility challenges.

II. APPLICATION:
All provider staff and service locations, directly operated or under contract.

III. DEFINITIONS:
Cultural Competency: An acceptance and respect for difference, a continuing self-assessment regarding culture, a regard for and attention to the dynamics of difference, engagement in ongoing development of cultural knowledge, and resources and flexibility within service models to work toward better meeting the needs of minority populations.

Limited-English Proficiency: Persons who cannot speak, write, read, or understand the English language in a manner that permits them to interact effectively with health care providers and social service agencies.

IV. POLICY:
It is the policy of Community Mental Health of Ottawa County (CMHOC) to accommodate access and assure a consumer’s full participation in services being offered. These services will be provided in a manner that recognizes and takes into consideration the consumer’s ethnicity, cultural differences, language proficiency, communication, visual and physical limitations. Staff at all levels of the organization will be culturally competent and sensitive to diversity and able to recognize the need for accommodation and how to accomplish such.

V. PROCEDURE:
A. The initial contact and assessment to determine eligibility for services will assess the need for accommodations in any of the following areas:
   - Limited English Proficiency
   - Ethnic/Cultural Background
   - Communication Impairments
   - Visual Impairments
   - Mobility Impairments
The assessment and need for accommodations will be so noted in the clinical record. CMHOC will ensure consumers have the right to receive information material and instructional materials relating to them in a manner and format that may be easily understood. All services will be provided in the language best understood by the consumer through bilingual staff and the use of qualified interpreters. Consumers will be notified that oral interpretation is available for all languages.

It is the responsibility of CMHOC to provide the appropriate accommodation (i.e. oral interpretation services) at no cost/free of charge to consumers and potential consumers for all non-English languages.

B. Consumers will be offered a choice in their preferred method of translation: face to face, phone, family member or friend. The preference of the consumer must be documented in the record.

C. CMHOC will notify consumers that written information is available in prevalent languages. Written material will be available in alternatives formats (i.e. DVD) and consumers will be informed of this option and how to access the necessary information.

D. Accommodations in all of the named areas will be coordinated by Access. Accommodations will be tracked on an annual basis to determine frequency and need for these accommodations.

E. For after hours crisis work and admissions to the Robert S. Brown Center (RSBC), requests for accommodations will be directed to the crisis line. Access will provide a list of available accommodation resources.

F. Service animals will be welcomed in all service locations.

G. All staff will receive initial training in accommodations and cultural competency during the Orientation process and with planned annual educational activities. Ongoing information on accommodations will be published in the staff newsletter and provided to consumers via the consumer newsletter.

VI. ATTACHMENT:
None Applicable

VII. REFERENCE:
Title VI of the Civil Rights Act of 1964
Americans with Disabilities Act of 1990
Rehabilitation Act of 1973