Worker Guide

Alternate Formats/Translations/Interpreters

A. Alternate Formats

1. Alternate format process

Notice of alternate formats

- If notice of alternate format not on application packet, include supplement language in large print;
- Give oral notification to client/applicant of alternate format availability and document such notification in narrative. (If oral notification not possible, send supplement language to client's last known address and document such mailing in the file.)

Assessing alternate format requests

- Accept request as part of customer service;
- Explore with client which format works and is available.

Processing alternate format requests

- Enter correct alternate format code on CMS and FSMIS screens in print (PRNT) fields;
- Client use forms needed in Braille, audio cassette, or computer disk – send Alternate Format Request Fax Sheet to Forms Unit at Central Office;
- Oral presentation of documents is the responsibility of staff. Document in the narrative all attempts to provide oral notification. If oral presentation is not made within a reasonable time period, send Alternate Format Request Fax Sheet to Forms Unit requesting material in audio cassette be sent to client;
- Branch-created document needed in Braille or audio cassette – send Alternate Format Request Fax Sheet to Forms Unit requesting material in needed format;
- Branch-created document needed in large print, oral presentation, or on computer disk – responsibility of branch to process and document in the narrative the format used and the date sent to client.

NOTE

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Do NOT delay benefits or services while waiting for a document to be processed in an alternate format. If necessary, read the document to the applicant or client and help them complete the form.

2. Availability, assessing and processing alternate formats

Alternate formats are documents that are made available through anything other than standard print. This includes documents in large print, Braille, audio tape, computer disk and oral presentation (phone or in person).

The Americans with Disabilities Act (ADA) is intended to protect persons with disabilities from discrimination in the services, programs or activities of all state and local governments. This includes accessing information about these services, programs or activities. DHS must ensure that communications with applicants, participants and members of the public with disabilities are as effective as communications with others. DHS policy states:

> The intent of providing alternate formats is to ensure that department communication with individuals with disabilities is as effective as that provided to individuals without disabilities. The department will use an individualized approach to respond to requests for alternate formats which may include the need for additional information or clarification. Agents of the department, in cooperation with individuals requiring alternate formats, will identify the most appropriate format. Primary consideration will be given to the individual's preferred format.

This document consolidates and revises previous instructions from DHS Central Office regarding the availability, assessment and processing of alternate format requests. If you have any questions concerning these matters, contact your branch ADA coordinator or operations manager.

Availability of Alternate Formats (AF)

When a client asks to receive information in an alternate format, the request provides DHS an opportunity to learn more about and better serve that client. In order for the client to make a request, they must be aware of the availability of alternate formats. Recently ordered and received application packet forms include a statement of notification regarding alternate format availability. However, because we will be using up old stock that might not have such printed notification due to cost, a supplement

with the alternate format notice must be included with the "old stock" packets. This supplement must also be available at the intake desk. The supplement should be in large print (at least 16 point font or 129 percent enlargement on a copier) and state: "If you have a physical or mental impairment that makes it hard for you to communicate, you can get DHS forms and notices in audio tape, Braille, computer disk, large print or oral presentation. Contact the receptionist or your worker to make a request."

Oral notification must also be given to applicants and recipients about the availability of materials in alternate format. The staff should document in the case narrative that such oral notification was provided, the date provided and the initials of the staff providing the notification, e.g., "12/14/98 - Oral AF notice. *Staff initials*." Please also include such oral notification as a regular part of the client/applicant orientation. If oral notification is not possible, e.g., no working telephone number for client, no face-to-face appointments scheduled or kept by the client, etc., document in the narrative any attempts to provide oral notification and/or the reason it was not possible and then send out a written notice of alternate format availability. You may use the supplement language for this purpose.

Assessing AF requests

DHS will not assess whether a client/applicant requesting materials in an alternate format is entitled to them under law. Rather, as a matter of customer service, DHS shall provide agency materials in alternate formats (e.g., Braille, audio tape, computer disk, large print, oral presentation) upon request. However, the agency shall explore with the client the best and most realistic format available given the client's request, the available processing and other relevant considerations.

Remember that although DHS will not assess whether a person is entitled to an alternate format under law, any request for an alternate format provides us with the opportunity to explore whether we have made available to the applicant/recipient a full array of services and resources to meet their individualized needs. This fits with our agency mission.

Processing alternate format requests

Coding

Once a request for alternate formats is made and you have worked with the client to determine the best format given the circumstances, you need to enter the correct alternate format code on the CMS and FSMIS screens in the print (PRNT) fields. You need to enter the alternate format coding on both screens. Correct coding will allow for processing of most information in the alternate format by Central Office. However, some information must be processed at the branch level. See below. The codes can be found on the Help Window in the PRNT fields on FSUP and UCMS screens. The requestor should not have to make a request every time they need a document in an alternate

format. Once coded the requestor should receive all DHS documents in the appropriate format.

Core Forms

We currently have all of the core forms available in audio tape and Braille in stock at Central Office. A list of such core forms is provided at the end of this worker guide, (MP-WG 11 CORE FORMS). Provision of documents in alternate formats is not limited to these core forms. Follow the instructions in the brochure to process a request for both core forms and other documents in audio tape or Braille.

If any core form is needed on computer disk, contact the Forms Unit in Central Office by email: DHS FORMS or facsimile at 503-373-7690, using the Alternate Format Request Fax Sheet.

Be sure to explore with the client all computer versions that are effective and enter all possible computer versions on the fax request sheet from the following list:

- IBM (Compatible):
  - MS Word;
  - Word Perfect.
- Macintosh MS Word;
- Postscript;
- ASCII.

If none of the listed versions meet the client's needs, explore other formats with the client, e.g., oral presentation, audio tape.

If a core form is needed in a format other than Braille, audio tape or computer disk, follow the instructions below on processing alternate format requests.

Notice Writer/CMS/FSMIS:
DHS Mainframe computer-generated and staff-initiated client notices

This category covers most DHS notices sent to applicants and clients. If the correct code is entered into the print (PRNT) fields on CMS and FSMIS, these notices are automatically processed in the requested alternate format (except oral presentation) and mailed directly to the client. If the client is coded for oral presentation, the Forms Unit will forward the document to the appropriate staff for processing. The staff should document in the case narrative all attempts to contact the client regarding the document, e.g., date of telephone call and staff's initials, and when and how contact is made, e.g., date of person-to-person contact or message left on answering machine,

and the staff's initials. If no presentation can be made within a reasonable time given the content of the notice, the staff should contact the Forms Unit in Central Office by facsimile at 503-373-7690 using the Alternate Format Request Fax Sheet to request that the document be placed on audio tape and sent to the client. If you are unclear what a reasonable time is in the situation, contact your operations manager.

Other
(E.g., local branch-created notices and documents)

There might be some documents created by the branch that are neither processed through the DHS mainframe nor sent out by DHS Forms and Distribution Unit and that are not core forms. One example is a form created and used by only one branch or district, or a letter drafted by staff and sent to the client. Any such notices and documents must be processed manually by the branch and a notation placed in the case narrative identifying the document processed, the alternate format used, the date, and the staff processing or requesting process of the document. For example, "Ltr re: _____, LP (large print), 2/10/99, S. Iverson" or "MSC Form 415, DC (*Computer Diskette*), 2/10/99, rqst to D. Zeit (Central Office) by S. Iverson."

Requests for documents to be put in Braille or audio tape should be faxed to Central Office Forms Unit at 503-373-7690, using the Alternate Format Request Fax Sheet.

Documents to be put in large print should be processed by the branch either by enlarging the notice on the copy machine or by changing the font on the computer before printing to at least 16 point or 129 percent enlargement.

Branch or district documents to be put on computer disk should be processed by the branch in the version, e.g., ASCII, WordPerfect, MS Word, which is available at the branch. If the version needed by the client is not available, and other formats have been explored with the client, e.g., audio tape, oral presentation, etc., and found not to be effective, contact your operations manager for guidance.

Oral presentations of a document are the responsibility of staff. The staff should document in the case narrative all attempts to contact the client regarding the document, e.g., date of telephone call and staff's initials, and when and how contact is made, e.g., date of person-to-person contact or message left on answering machine, and the staff's initials. If no oral presentation can be made within a reasonable time given the content of the notice, the staff should contact the Forms Unit in Central Office by facsimile at 503-373-7690 using the Alternate Format Request Fax Sheet and ask that the document be placed on audio tape and sent to the client.

NOTE	
!	ON ALL ALTERNATE FORMAT REQUESTS – If the requested format for a document needed by the applicant or client is not immediately available in the branch office, do NOT delay benefits or services while waiting for the document to be processed in the requested format. Rather, read the document to the applicant or client and help them complete the document.

3. Alternate format supplement

Alternate Format Supplement

If you have a physical or mental impairment that makes it hard for you to communicate, you can get DHS forms and notices in:

- Audio tape;
- Braille;
- Computer disk;
- Large print;
- Oral presentation.

Contact the receptionist or your worker to make a request.

B. Translations/interpreters

1. Languages

Written documents, such as forms and notices, used by applicants and clients are translated and available in the following languages:

Language	Code	Language	Code
Bosnian	BN	Romanian	RO
Cambodian	CA	Russian	RU
Hmong	HM	Somali	SM
Laotian	LA	Spanish	SP
Mien	MI	Vietnamese	VI

When an applicant or client speaks and reads a language other than those listed above or if you do not have an employee who speaks one of the languages above, see Interpreter Services below for available options.

2. Translated forms

All client use forms are translated into the above nine languages. Administrative or internal use forms are not translated.

Some of these translated forms are available to you through FBOS (the computer mainframe Forms Order System). However, we only stock those forms that are ordered frequently. Requests for low or seldom used forms are processed once a week. The forms requested are sent to be printed and then mailed to your office weekly. (For information about FBOS, contact the person in your branch who orders supplies, or John Ong in Admin Services, 503-373-1342, email address: DHS-OHA.Distribution@state.or.us.

We have some of these forms available on the Forms File Server accessed through the Internet at https://aix-xweb1p.state.or.us/es_xweb/FORMS/. Eventually all translated forms will be on the Forms File Server. At least one personal computer in each office should have Internet access and Adobe Acrobat Reader. With this software you can access, view, and print a copy of the form to your local printer.

✔	**For more information about alternate formats and translations, see the following websites:**

Alternate formats and translations	http://www.dhs.state.or.us/admin/forms/alt_formats_languages.htm
DHS Find a Form	http://dhsforms.hr.state.or.us/forms/databases/findforms.htm
Translated Documents in Alternate Format Procedure	http://www.dhs.state.or.us/policy/admin/forms/050_001_02.htm
Ordering Documents in Alternate Format Procedure	http://www.dhs.state.or.us/policy/admin/exec/010_005_03.htm

Contacts: Email: DHS FORMS
Fax: 503-373-7690

3. Interpreter services

(A) Introduction

The Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin. This act requires that services and benefits be provided in a consistent manner to all clients. No person shall be denied an opportunity to participate in a program administered by the department because of their race, color or national origin.

Oregon law requires DHS and SDSD/AAA branch offices where there are 35 or more cases that share the same foreign language to provide bilingual services and translated materials to their limited-English-speaking clients. The department is committed to providing bilingual services and other communication alternatives to the families we serve. The department is also committed to providing communication services to deaf and blind clients whenever communication needs exist that affect the client's ability to apply for or receive benefits offered by the department.

The Central Office maintains a list of employees available to provide bilingual services to limited English speaking clients. Call the CAF Central Office receptionists at 503-945-5600 for assistance.

Each employee has rated their own interpretation skill level, and the rating has gone through a verification process. This may occur during the interviewing which is part of the hiring process, or could occur later if the need arises. (The operations manager may act as the reviewer if they have the language skills necessary to evaluate the employee's skill level.) The rating system below shows the criteria staff has used to do their self-assessment and designates the type of services an employee with that rating is expected to perform.

High (H)	Employee can quickly translate, read or interpret policy and forms that might be complicated or technical. (Examples of forms include: DHS 415R, SDS 539A.)
Medium (M)	Employee can translate, read or interpret forms and materials that are not complex. More time may be needed. (An example includes: SDS 914.)
Low (L)	Employee can translate, read or interpret simple phrases or concepts. Employee is able to explain that the department will provide a bilingual staff person or a qualified interpreter, make appointments, give directions to the office, etc.

(B) Deaf and Hard of Hearing Services Program (ODHHS)

The department-wide policy for Scheduling a Sign Language Interpreter/ Real-Time Captioner (DHS-010-005-02) can be found at http://www.dhs.state.or.us/policy/admin/exec/010_005_02.htm:

NOTE

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The faxed format is no longer available from ODHHS.

- Use the Communication Service Request On-line Interpreter/Real-Time Captioner Request form. This is a Web-based form that is completed and submitted online (http://www.oregon.gov/DHS/odhhs/ecs.shtml).

(C) Guidelines for staff who work with limited-English-speaking, hearing-impaired or blind clients

(1) In Oregon, you do not have to speak English, have good hearing or be sighted to apply for public assistance programs. The agency is responsible for ensuring a limited-English-speaking client is communicated with in

words they understand. (A limited-English-speaking household is one that does not have an adult member who is fluent in English.) The agency is also responsible for ensuring that clients who have difficulty hearing or seeing are communicated with in a way they understand.

(2) Oregon's confidentiality regulations apply to all clients. Friends and family members of limited-English-speaking, hearing-impaired and blind clients should have no more involvement in the client's case than do friends and family members of English-speaking clients, or clients who are not hearing-impaired or blind.

(3) The program delivery requirements for limited-English-speaking clients and hearing-impaired and blind clients are equal to those for English-speaking clients. DHS programs are accessible to all clients and meet individual needs.

(4) When a branch office has a caseload of 35 or more limited-English-speaking households that all speak the same foreign language, all forms and notices will be translated into that language (if they have not already been translated into that language). All branch offices with clients who speak a language for which forms and notices have been translated must then provide forms, notices, and other documents in that foreign language.

(5) All limited-English-speaking, hearing-impaired and blind clients are entitled to oral or sign language interpretation services when they apply for or receive benefits from the department. Branches that meet the 35 or more standard described in part (4) above must also provide help through a bilingual worker.

(6) Ask the client which language they prefer to speak. If their preference is other than English, inform the client at intake that they will be assigned bilingual staff or an interpreter will be provided.

(7) Friends and family members should not be used as interpreters because this violates the client's right to privacy, and because the department cannot be assured of the accuracy of such translations.

(8) If a client refuses to use the department's interpreter, record the reason for the refusal in the case record. Always record who provided the interpretation each time an interpreter is used (unless the case has been assigned to a bilingual worker).

(9) Remember to talk to the client and not the interpreter. The client will be answering all of the questions and making all of the decisions.

(10) When a client completes a form with the help of an interpreter, both the worker and the interpreter should initial the form. Documenting this information is important if there should be a hearing or lawsuit at a later date.

(D) Responsibilities of employees listed in the Interpretation Services Directory

(1) To be listed in the Interpretation Services Directory, you must speak and understand the client's language, also understand English, and be able to clearly present policy in the client's language. If you are a sign language interpreter, you must be able to clearly present policy in sign language.

(2) Bilingual staff and staff who can communicate in sign language will do a self-assessment of their foreign language or signing skills. They will be asked to sign the self-assessment form attesting to its accuracy. The self-assessment will be verified by the operations manager.

(3) A staff person acting as interpreter has a passive role in the process of assisting workers and clients. Their function is to translate word for word, or in words or signs that are as close as possible to the speaker's intended meaning. This is unlike a bilingual staff assigned full responsibility for a case, who will actively converse with the client in the client's language.

(4) Interpreters provide a professional service to clients that must be taken seriously. Interpreters are to work with clients in ways that do not lead the client to become overly dependent on their help.

(5) Occasionally, staff will be called upon to act as interpreters for clients being served by other branches. These services will usually be provided by telephone.

(6) On rare occasions, staff will provide interpretation services to clients who are being served by other agencies or providers. This will happen when the situation is considered urgent and other resources are not available. This type of service should also be approved by the operations manager or their delegate. In these cases, services will generally be provided by telephone.

(7) The department will not "loan" staff to doctors, hospitals or the court system for use as medical or legal interpreters. These situations require special skills that department staff are not expected to use in the routine performance of their job as interpreters. Additionally, there would be tort liability risks for the agency if department staff were used as medical or legal interpreters.

(8) Department staff giving services to limited-English-speaking or hearing-impaired clients will ensure that these clients receive information and services as quickly as would normally be received by English-speaking

clients and clients who are not hearing-impaired. Our goal is to serve all clients within the same timeframes.

(E) Responsibilities of managers who supervise employees listed in the Interpretation Services Directory

(1) Review the self-assessment form of each bilingual employee and each employee with sign language skills. Ensure the accuracy of the self-assessment through discussion with the supervisor or employee as necessary. If you or the employee's supervisor are not fluent in the foreign language of the bilingual staff person, or are not fluent in sign language, take appropriate steps to verify the skill level of the employee. This could take the form of identifying someone in the community with those skills and having them verify the staff person's level of competency. When a disagreement occurs between the level of competency the bilingual staff claims and the level of competency documented by the person doing the verification, the interpretation staff and operations manager will meet to resolve the discrepancy.

(2) Send a copy of the Interpretation Assessment Form to DHS Administrative Services Unit when a new bilingual employee or an employee with sign language skills is hired. Send the copy after you have signed the Interpretation Assessment Form attesting to the employee's skill level.

(3) Ensure that an employee who is listed in the Interpretation Services Directory will be available to provide interpretation services at the skill-level indicated.

(4) Make decisions about bilingual and sign language staff availability and the type and extent of interpretation services to be provided.

(5) Use judgment about the level of interpretation skill needed to meet the client's needs. If a client's situation is complex, avoid using a low-skill-level interpreter. If a low-skill-level interpreter is used, explain to the client that the interpreter is being used only to obtain basic information and to answer simple questions until someone with a higher skill level is available.

(6) Provide each employee at their annual review a copy of the Interpretation Assessment Form. Verify any new information provided on the evaluation forms and send a copy of the verified Interpretation Assessment Form to DHS Administrative Services Unit.

(7) Ensure that clients are informed at intake that an interpreter is available if they prefer to speak in a language other than English.

(8) Ensure that contacts and services are provided to limited-English-speaking and hearing-impaired persons within the same timeframes as English-speaking persons and persons who are not hearing impaired.

(F) Procedures for branches where there are no bilingual or sign language staff

Use the Communication Service Request Interpreter/Real-Time Captioner Request form (http://www.oregon.gov/DHS/odhhs/ecs.shtml) to request communication services for individuals and/or clients who are deaf or hard of hearing and require these services to participate in meetings, trainings, or other appointments. The phone number for Interpreter Services is 503-373-7605 or 800-521-9615.

For Telephone Language Interpreter Services contact LanguageLink by calling 877-764-7888. You will be asked to give your account number (8606), your full name, your branch name and location and the language you need, along with other questions.

✔	**For more information, see 2010 Self-Sufficiency Action Request SS-AR-10-009 (http://www.dhs.state.or.us/policy/selfsufficiency/publications/ss-ar-10-009.pdf).**

CORE FORMS

DHS 170	Filing Customer Service or Privacy Complaints or a Report of Discrimination form
DHS 171	Client Comment Form
DHS 210	Notice of Pending Status
DHS 210A	Notice of Information or Verification Needed
DHS 223	Proof for Eligibility
MSC 231	Designation of Authorized Representative or Alternate Payee
MSC 415	What do I do with the packet of forms? (Instructions for Application/Redetermination of Eligibility)
MSC 415F	Application for Services
DHS 415R	Your Rights and Responsibilities
DHS 428A	Cooperating with Child Support Enforcement
MSC 443	Administrative Hearing Request
DHS 456	Notice of Decision and Action Taken
DHS 457D	Voluntary Agreement to Reduce or Close Benefits or Withdraw Application and Notice of Action Taken
DHS 488	Monthly Reporting System
DHS 491	Statement of Person Living in the Household
DHS 943	Change Report
MSC 2099	Authorization for Use and Disclosure of Information

DHS 7280F	OFSET Rights and Responsibilities
DHS 7294	Notice of Income and Benefit Calculation
DHS 7476	Employment Related Day Care (ERDC) Application and Supplemental Nutrition Assistance Program (SNAP) Application
DHS 7819	Your Rights and Responsibilities While in JOBS and JOBS Plus
DHS 7849	JOBS Appointment Notice
DHS 7869	JOBS Appointment Notice for Re-engagement
DHS 7873	Notice of JOBS Program Disqualification or Other Penalty
DHS 9001	Client Complaint Information
MSC 9013	We Want to Serve You Well *(paper only)* (contained in client application packets DHS 6608 and MSC 6623 only)

Other forms

MSC 503	Oregon Voter Registration Card
CSF 11 0112	Affidavit in Support of Establishing Paternity
OHP 7210	Application for Oregon Health Plan and Healthy Kids