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Executive Office of Health and Human Services
Department of Transitional Assistance
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Field Operations Memo 2008-16
April 1, 2008

To: Transitional Assistance Office Staff
From:  John Augeri, Assistant Commissioner for Field Operations
Re: Department Interpreter Services Enhancements

Overview

To comply with federal law, the Department is required to advise clients of the right to professional interpreter services and must provide interpreter services to clients whose primary language is not English or who use American Sign Language (ASL), regardless of language, national origin or noncitizen status. Interpreter services must be provided to clients with Limited English Proficiency (LEP) and ASL users at the first point of contact.

LEP/ASL clients must not be turned away or told to return with an interpreter. A client who presents either in person or by telephone with an adult intending to act as an interpreter must be advised that a professional interpreter can be provided free of charge. The client may decline the use of professional interpreter services and choose to have the adult serve as an interpreter.

Important: Children over age 12 may interpret only to schedule an appointment. Children age 12 and under must not be asked to interpret for any purpose.

**Department
Interpreter
Services**

The Department has three means of assisting clients with professional interpreter services at the TAO:

- Bilingual AU Managers and Human Services Assistants (HSA);
 - Qwest Telelanguage Line; and
 - Catholic Charities and Somali Development Center Interpreter Services.
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**Department
Interpreter
Services
(Continued)**

Bilingual AU Managers are located in TAOs based on identified language needs. The Department also employs HSAs who act as interpreters for the following high incidence languages: *Cambodian, Chinese, Russian, Spanish and Vietnamese*. Each HSA is affiliated with a specific TAO. The HSA list is on the DTA Online Intranet site. To access the list, click on Administration and Finance, select the Interpreter Services link and then select the *TAO Interpreter List*.

Bilingual AU Managers and HSAs must be used, if available, for in-person or telephone communications with clients. Qwest Telelanguage interpreters (TeleInterpreters) should be accessed whenever a bilingual AU Manager or an HSA is unavailable to assist a walk-in or telephone client. All TAO staff will have direct access to Qwest TeleInterpreters. **Supervisory sign-off is no longer required to access the Qwest Telelanguage Line.**

Catholic Charities and the Somali Development Center provide statewide interpreter services. However, these services should be used only for scheduled face-to-face appointments since there is 72 hour wait time for providing contracted interpreters.

**Guidelines for
Providing
Interpreter
Services**

The following interpreter services guidelines have been established.

- The Department is committed to ensuring that interpreters have been trained in interpreter services, ethics and confidentiality. Professional interpreters will be offered free of charge to all LEP/ASL clients to conduct Department business.
 - A client who presents either in person or by telephone with an adult intending to act as an interpreter must be advised that a professional interpreter can be provided free of charge. The client may decline the use of professional interpreter services and choose to have the adult serve as an interpreter.
 - Children over age 12 may interpret only to schedule appointments. Children age 12 and under may not be asked to interpret for any purpose.
 - A client who speaks some English or appears to understand English may not have the language skills needed to fully comprehend Department terminology or rights, responsibilities and penalties. If the AU Manager or other Department staff believes that a professional interpreter is necessary, at any point in the interaction, a bilingual AU Manager or HSA, if available, or Qwest TeleInterpreter should be accessed to effectively communicate with a client.
 - A client has the right to refuse the use of a particular bilingual AU Manager, HSA or statewide contracted interpreter if uncomfortable with the interpreter for a personal or cultural reason. Department staff must not inquire as to the reason for refusal. In this situation, a Qwest TeleInterpreter must be accessed to conduct the interview.
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**Guidelines for
Providing
Interpreter
Services
(Continued)**

- If a Catholic Charities or Somali Development Center contracted interpreter does not appear for a scheduled in-person interview, the AU Manager must immediately access a Qwest TeleInterpreter to conduct the interview. The AU Manager must not reschedule the interview in this situation.
- Clients must be allowed to complete Department business on the date of first contact, *if time permits*. Otherwise, a follow-up appointment must be scheduled using the interpreter to arrange a mutually convenient date and time. All timing related rights of the client must be preserved as of the first date of contact, based on program rules.

**Accessing
Qwest
TeleInterpreters**

To use the Qwest Telelanguage line, the TAO Receptionist, Switchboard Operator or AU Manager must:

- call 1-800-822-5552;
- provide the operator with the language request and any third party call requirements;
- give the Department access code which is **56005**, followed by the TAO division number; and
- inform the operator of the need to use a speaker telephone instead of a 3-way call for the translation, if necessary.

The operator will connect you to your interpreter.

For more information on Qwest TeleInterpreters, refer to the *How to Use TeleInterpreters' Language Services* guide which is attached to this memo.

**Receptionist
Responsibilities
for Walk-In
Clients**

The TAO receptionist is the first point of contact for walk-in clients and will have an initial role in helping to assess interpreter needs. If a client requests an interpreter or cannot communicate effectively in English, the TAO receptionist must:

- refer to the *Do You Need an Interpreter?* poster or page of the **LEP Services Binder** so the client can indicate the language he or she speaks; **Note:** If the client cannot read, the Receptionist must access a Qwest TeleInterpreter to ascertain the language spoken and reason for TAO visit.
 - open the **LEP Services Binder** to the appropriate language so the client can read the *While Waiting for an Interpreter* instructions;
 - give the client the *Your Right to Interpreter Services* brochure in the appropriate language;
 - determine the reason for the visit to the TAO if possible by communicating with the client, adult intending to act as interpreter, bilingual AU Manager, HSA or by accessing a Qwest TeleInterpreter;
 - record the client's name, if possible, and the language requested; and assign the client to the next available AU Manager, a bilingual AU Manager if possible, and inform the AU Manager that an LEP/ASL client is waiting.
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**TAO Staff
Responsibilities
for Mail-In, Fax
or Web Clients**

The appropriate TAO staff person must review all mail-in, fax and web Food Stamp applications to determine if an interpreter request has been made. A client requesting interpreter services must be assigned to a bilingual AU Manager, if possible, or assigned an AU Manager who is informed that an interpreter will be needed.

Important: In accordance with *Field Operations Memo 2006-30*, the AU Manager must attempt to contact by telephone an LEP/ASL client who requests a hardship waiver. If the client is unavailable by telephone the AU Manager must send an appointment letter scheduling a telephone interview. An HSA, if available, or Qwest TeleInterpreter must be used for the telephone contact.

**Switchboard
Responsibilities
for Telephone
Clients**

When a client *telephones the TAO*, and it is determined that interpreter services are needed, the clerk at the switchboard must access a Qwest TeleInterpreter to determine the reason for the call, and once sufficient information has been obtained, forward the call to the appropriate TAO staff. Qwest can also assist DTA staff with determining the language spoken, if unknown at point of initial contact.

**Centralized Call
Center
Responsibilities**

When a client contacts Recipient Services or the Brockton Call Center, and it is determined that interpreter services are needed, a Qwest TeleInterpreter must be accessed to conduct Department business with the client if a bilingual AU Manager is unavailable.

**AU Manager
Responsibilities
for Providing
Interpreter
Services**

By the time the client is referred to an AU Manager, in most instances, the need for interpreter services has been identified.

- For any walk-in client, the AU Manager must secure an interpreter based on the client request or need as follows:
 - a bilingual AU Manager or HSA must be used, if available; or
 - a Qwest TeleInterpreter must be accessed.
 - Once an interpreter has been secured, in person or by telephone, for a new applicant, the AU Manager must:
 - give the walk-in applicant the *I Speak* card (*FSP-LC Rev. 2/91*); or
 - record the telephone applicant's language on the *I Speak* card by using the interpreter to communicate information about the card.
 - For clients with scheduled in-person interviews, the AU Manager must secure an HSA or statewide LEP/ASL contracted interpreter by accessing Policy Online. Select the Forms option to complete the *Interpreter Request Form* either online or as a saved document. E-mail the form to Adele Quintiliani at Adele.Quintiliani@state.ma.us with the date and
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**AU Manager
Responsibilities
for Providing
Interpreter
Services
(Continued)**

time of the appointment, and cc: Dennis Johnson at Dennis.C.Johnson@state.ma.us. Be sure to also email a copy of the form to the TAO Director/designee.

- For clients with scheduled telephone interviews, the AU Manager must secure an HSA using the instructions above or use a Qwest TeleInterpreter. If a client telephones the AU Manager to ask a question or request case information, the three-way calling functionality should be utilized to connect the AU Manager, LEP client and Qwest TeleInterpreter.
- For a client who presents either in person or by telephone with an adult intending to act as an interpreter, the AU Manager must offer professional interpreter services free of charge. The client may decline the use of professional interpreter services and choose to have the adult serve as an interpreter. In this situation, the AU Manager must enter on the BEACON Narratives tab: *Client declined professional interpreter services.*

**TAO Director/
Designee
Responsibilities**

The TAO Director/designee should track interpreter requests using the *Interpreter Request Form* as well as Qwest Telelanguage line reports. This tracking will ensure that interpreters are being utilized appropriately by Department staff.

The TAO Director/designee must also ensure that TAO staff are familiar with three-way calling procedures, as well as how to access Qwest Telelanguage and ASL /TTY services.

**Three-Way
Calling
Functionality**

All TAO telephone systems have three-way calling capability. Instructions for placing a three-way call are available in each TAO. The three-way calling functionality must be used when a client needing interpreter services telephones the TAO, Recipient Services or the Brockton Call Center and a Qwest TeleInterpreter must be connected.

References

TAFDC and EAEDC – 106 CMR 701.360.

Food Stamp Program – 106 CMR 360.510.

**Obsolete
Material**

Field Operations Memo 2005-34 is now obsolete.

Questions

If you have any questions, your Hotline designee may call the Policy Hotline at 617-348-8478.

How To Use TeleInterpreters' Language Services

1 Call TeleInterpreters at: **800-822-5552**

2 Provide operator with language request and any outbound 3rd party call requirements.

3 State your access code: **56005**

Additional information (if required):

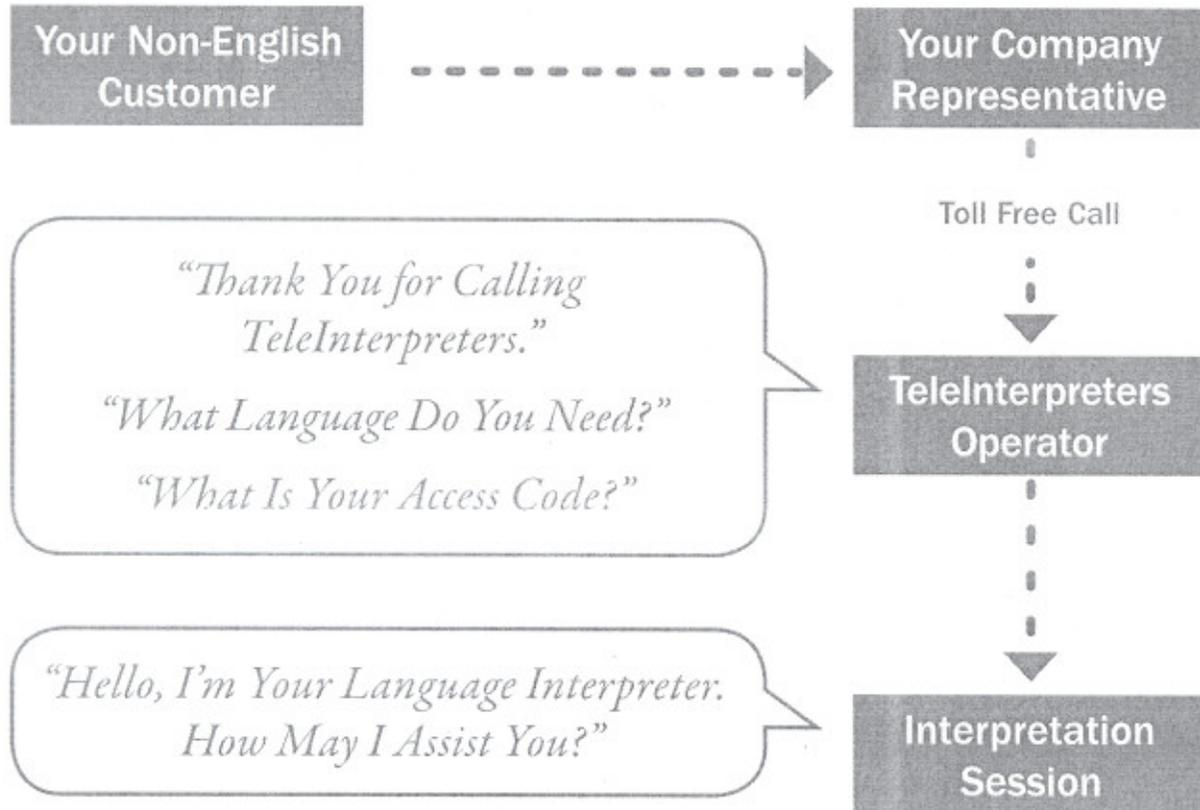
State Your Name, Unit ID & Unit Name

The operator will connect you to your interpreter.

Helpful Tips On Working With An Interpreter

- Briefly inform the interpreter about the nature of the call.
- Remember you have total command of the call and the line of questioning. The interpreter's responsibility is to facilitate communication.
- Use short sentences where possible. Pause at the end of a complete thought to allow for interpretation.
- Speak distinctly, especially if using a speakerphone.
- Do not expect "word-for-word" interpretation, as languages differ in grammatical structures and ways of expressing ideas.

Over The Phone Interpretation Call Flow



Trouble Management: Reporting A Service Issue

- Call TeleInterpreters’ Client Services at 800-298-3307 or send an email to cs@teleinterpreters.com.
- Provide our Client Services representative with:
 - ① Your company’s name
 - ② Your name
 - ③ Call-back number
 - ④ Date and time of service issue
 - ⑤ Language
 - ⑥ Brief description of issue
- You will receive resolution within 2 business days.

