

# *Best Practices Companion Manual*

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*to the Linguistic and Cultural Competence  
Guidelines for State of Illinois Subcontractors and  
Vendors*

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## *Introduction*

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In early 2008 the Illinois Governor's Office of New Americans Policy and Advocacy (ONAPA) convened a group of subcontractors and vendors to participate in the development of linguistic and cultural competence (LCC) guidelines. These guidelines were to be developed as a mechanism for improving accessibility and sensitivity in state-funded services delivered by a constellation of private and non-profit organizations that received grants and contracts to serve residents of Illinois. Fifty-eight individuals representing thirty-six subcontractors and vendors doing business with ten state agencies were invited to participate. Twenty-two of the invited organizations chose to actively engage in the development, testing, and approval of the attached Linguistic and Cultural Competence Guidelines for State of Illinois Subcontractors and Vendors.

This "Pilot Group" chose to adapt the guidelines from several well-established sources including: 1) National Standards on Culturally and Linguistically Appropriate Health Care Services, better known as the CLAS Standards; 2) Cultural Competence Standards in Managed Care Mental Health Services: Four Underserved/Underrepresented Racial/Ethnic Groups; and 3) National Association of State Workforce Agencies: Checklist for Developing a Limited English Proficiency (LEP) Plan.<sup>1</sup> They also made suggestions based on their own experiences in the field. The intent was to create a set of guidelines that would be universal regardless of an organization's line of work. The CLAS standards, for example, were developed specifically for health care organizations, which makes them too specific for organizations working in other fields.

The following ten guidelines are recommended for all subcontractors/vendors of the State of Illinois whose contracts or grants require them to provide direct services to individuals or families. The guidelines apply only to the program(s) funded by the State but are recommended for the organization as a whole. They were developed by a representative sample of subcontractors/vendors from across ten state agencies. (Subcontractors/vendors will also be referred to as "organizations" in this document.)

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<sup>1</sup> *National Standards on Culturally and Linguistically Appropriate Health Care Services (CLAS)*, U.S. Department Health and Human Services Office of Minority Health, March 2001. <http://www.omhrc.gov/templates/browse.aspx?lvl=2&lvlID=15>; 2) *Cultural Competence Standards in Managed Care Mental Health Services: Four Underserved/Underrepresented Racial/Ethnic Groups*. <http://mentalhealth.samhsa.gov/publications/allpubs/SMA00-3457/ch2.asp>; 3) *National Association of State Workforce Agencies: Checklist for Developing a Limited English Proficiency (LEP) Plan*. [www.WorkForceATM.org](http://www.WorkForceATM.org)

It is understood that achieving linguistic and cultural competence is a process that takes time and that in recommending these guidelines, the State of Illinois pledges support for this effort by providing informational resources, technical resources, and where possible, financial support for the implementation of these guidelines. This support implies that subcontractors and vendors are engaged in a mutually supportive partnership with the State of Illinois to increase the linguistic and cultural competence of all services.

## **Key Definitions**

**Cultural Competence:** “A set of congruent behaviors, attitudes, and policies, that come together in a system, agency, or amongst professionals and enable that system, agency, or those professionals to work effectively in cross-cultural situations.”<sup>2</sup> Cultural competence is achieved on a learning continuum, in which people and organizations learn about themselves, the people they service, and the skills associated with understanding and behaving in ways that respect differences and overcome barriers to communication.

**Language Access:** Provision of language assistance services, including bilingual personnel and interpreter services, at no cost to each consumer with Limited English Proficiency (LEP), at key points of contact, in a timely manner; Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin, including actions that *delay, deny, or provide different* quality services to a particular individual or group of individuals.

**Meaningful Access:** Subcontractors/vendors are required to take reasonable steps to ensure meaningful access to its services and programs by Limited English Proficient (LEP) persons. Compliance involves the subcontractor/vendor’s self-assessment balancing four factors: 1) the number and proportion of eligible LEP persons, 2) the frequency of contact, 3) the importance or impact of the contact upon the lives of the person(s) served, and 4) the resources available to the organization. The organization will collect data on primary spoken language and, as appropriate, develop a plan to meet the needs of LEP customers.

**Bilingual/Bicultural:** Bilingual/bicultural staff are usually native speakers who, when hired, have had their written and oral fluency in both English and their native language assessed thoroughly. They can communicate directly with consumers in their preferred language. Interpreters provide oral language services and, when trained, have received training in both consecutive and simultaneous interpretation skills. They have made a commitment to deliver language services that conform to ethical and professional standards of communication.

**Interpreter:** "Interpreter" means a person fluent in English and in the necessary second language who can accurately speak, read, and readily interpret the necessary second language, or a person who can accurately sign and read sign language. Interpreters shall have the ability to orally interpret technical or special terms particular to the situation in which they are providing language services. Interpreters may include members of a professional staff or may be hired contractually from a language services firm.

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<sup>2</sup> Cross Terry, Bazron BJ, Dennis KW, Isaacs MR. *Towards a Culturally Competent System of Care: Volume I*. CASSP Technical Assistance Center, Georgetown University Child Development Center. Washington, DC; 1989.

**Translation:** Refers to the translation of the written word; Qualified translators have experience, education, and training in the art and skills of translation. They have command of English and the target language and are familiar with technical or special terms used in particular disciplines. They are aware of geographic differences and dialects particular to language groups such that they can determine if they are qualified to translate documents for a particular language group.

## ***Guideline #1***

***Organizations should have a linguistic and cultural competence plan for the funded program(s) or the organization as a whole that includes clear goals, outcomes, policies and/or procedures related to the provision of culturally and linguistically appropriate services. (CLAS 8, 9, 10, 11)***

The purpose of a Language and Cultural Competence (LCC) Strategic Plan is to assist your organization in defining, structuring, and measuring its progress along the cultural competence continuum. A strong LCC plan should be interwoven with the organization's broader mission, operating principles, and service goals. Ideally, accountability for outcomes should reside at the highest levels of leadership. The Plan should identify and prioritize strategic goals relative to LCC, define critical outcomes for the organization and the client, and establish benchmarks.

Any good strategic planning process requires a Current Reality Analysis followed by the development of a vision statement and strategic priorities. LCC planning is no different, but it is focused on a circumscribed set of issues.

The **LCC Current Reality Analysis** requires the compilation of qualitative and quantitative data that will inform planning, and should include a gap analysis. Some of the types of data you might collect include, but are not limited to:

1. Service-area demographics on race, ethnicity, language, and country of origin; Also look at population projections for the future.
2. Current consumer data on race, ethnicity, language, and country of origin
3. Data on your prior experience with Limited English Proficient (LEP) consumers, e.g., number of encounters, languages/dialects needed, interpretation/ translations provided, gaps in service, delay or denial of services because you have been unable to meet demand for language services
4. Focus groups and interviews with consumers, staff, and/or community leaders to learn about support networks, family ties, spiritual leadership, beliefs, customs, and values of the cultural groups in your service area; Review of professional literature that discusses these issues for key groups
5. Consumer satisfaction data
6. Data on the number and diversity of bilingual/bicultural staff, language assessment processes, and training

### **LCC Strategic Planning**

Once data has been compiled and analyzed, it is beneficial to form a committee that includes top management and board members, as well as front-line staff and consumers or respected community leaders from among the LEP populations served, who can act as "culture brokers" throughout the planning process. This group will need to review the data and discuss implications for the way your

organization currently does its business. The committee should develop a set of strategic questions that need to be addressed in the planning process. Key areas of inquiry might include such questions as:

1. Does your agency have a mission statement that incorporates cultural and linguistic competence in service delivery?
2. Does your agency support practice models that incorporate culture in the delivery of services?
3. Does your agency consider cultural and linguistic differences in developing quality improvement processes?
4. Does your agency systematically review procedures to ensure that they are relevant to delivery of culturally competent services?
5. Are there structures in your agency to assure consumer and community participation?
6. Does your agency have a process for providing language services, either through the use of bilingual/bicultural staff and/or trained interpreters?
7. Does your agency post signs and produce materials in the languages of current and prospective clients?
8. Does your agency collaborate with community-based organizations to address the needs of the culturally and linguistically diverse groups in the service area?

There are numerous other questions that organizations can and should ask themselves during the planning process. These will need to be customized to your specific organizational structure, size, and service array.

The Strategic Plan, once developed, should include a modest and prioritized set of strategic directions that will advance language and cultural competence over a three- to five-year period. It should clearly articulate goals, objectives, outcomes, and benchmarks for achieving desired outcomes. Most importantly, the plan should be Specific, Measurable, Achievable, Reasonable, and Time Sensitive (SMART).

Particularly important to a successful LLC plan is a companion budget that makes specific resource allocations that speak to the overall commitment of an organization. Budget items that reinforce a culturally competent organizational structure include funds for professional development, language services such as translation of program materials or the use of interpreters, and communications strategies to reach diverse audiences.

## ***Guideline #2***

***Organizations should implement strategies to recruit, retain, and promote, at all levels, diverse personnel and leadership that are representative of the demographic characteristics of the service area. (CLAS 2)***

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The hiring of bilingual individuals from diverse cultures, representative of the demographic population of the service area, is critical to the delivery of relevant and effective services for consumers. Staff diversity at all levels of an organization contributes to the authenticity of organization efforts and ensures that there are people internal to the organization that can lend insight and credibility to LCC strategies.

Organizations should strive to have a body of personnel that are, generally speaking, representative of the demographics of the service area. Every organization has limitations. Resources to deliver language services or to provide cultural competence are limited in the best of circumstances. In addition, some organizations serve many language groups, some of them relatively small in number. Given these practical challenges, this guideline is meant to promote continued, good-faith efforts to recruit and retain a diverse staff. At its best, the goal of staff diversity should be incorporated into an organization's mission statements, strategic plans, and goals. The optimum goal would be the creation of a culture that embraces the challenges introduced by new and diverse perspectives, life experiences, and values.

At the human resources or systems level, your organization will need to develop a written plan for the recruitment, retention, and promotion of bilingual/bicultural personnel aligned with the demographics of your service area.

Some specific steps include:

- Defining what is meant by cultural and linguistic competence in your organization and clearly identifying the skills associated with your definition.
- Revising job descriptions so that they clearly state qualifications, skills, and language competency levels.
- Developing a language and cultural competence assessment process for job applicants. The best processes are conducted in English and the target language, and include an oral conversation as well as writing exercises in both languages. The interview is best conducted by two people who speak both languages or one English speaker and one bilingual interviewer in the target language. The question protocol should include inquiries that address knowledge of customs, values, beliefs, and behaviors of the target language group as well as awareness of American norms that might impact communication and service delivery.
- Recruitment should be broad and include racial/ethnic media outlets, community centers, colleges and

universities with racial/ethnic affinity groups, and ethnic/racial business associations or those with affinity groups.

When hiring bilingual staff, it is *essential* that language skills be evaluated. Self-assessment of language fluency is inadequate and an unacceptable hiring practice. Non-native speakers who have acquired a second language may miss cultural nuance or lack knowledge of specific vocabulary essential to a field of practice. They may not know particular dialects or word usage specific to geographic regions. Native speakers may speak in a dialect different from your service population or hold his/her own biases or prejudices about fellow countrymen and women different from themselves. Class is a big divider in many countries, so hiring an individual from a high class to serve consumers from a lower class may create problems that are not apparent to your organization. Both non-native and native speakers are not necessarily good interpreters as there are specific roles, responsibilities, and skills associated with high-quality interpreting that will be discussed in more depth later.

Organizations must set clear standards, policies, and procedures for language services and ensure that all personnel understand the guidelines and processes for implementation.

## ***Guideline #3***

***Organizations should ensure that personnel at different levels and across relevant disciplines receive ongoing education and training in culturally and linguistically appropriate service delivery. (CLAS 3)***

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The hiring of diverse personnel alone does not automatically guarantee linguistically or culturally competent service provision. In diverse communities, it is likely that many staff will interact with consumers representing various countries of origin, language competency, and socio-economic status; staff education and training are essential. However, if resources are limited, emphasis should be placed on training direct service staff and those managers that supervise them.

Managers must understand basic principles underlying language and cultural competence, as well as the knowledge and skills that they can reasonably expect their staff to acquire through training and experience in the field, if they are to be competent supervisors. Managers should establish clear LCC expectations for their staff in the form of annual goals to be achieved and engage in ongoing reflection and evaluation of these goals.

Training goals should be adjusted as necessary to suit the needs of the staff as well as the populations served. All new employees should receive basic training and more advanced training should be offered on a regular basis. The purpose of training is for staff to progress along the cultural competence continuum, which requires ongoing, iterative workshops that build knowledge and skills. Pre- and post-tests of knowledge and skills acquisition should be administered.

Topics for training might include:

- Definitions of key terms, e.g., *cultural competence, language access/services, meaningful access*
- Demonstrated knowledge and understanding of: personal cultural beliefs, especially as they pertain to the type of service your organizations delivers; cultural beliefs and norms of ethnic and socio-cultural groups serviced by your organization; understanding of the history and migration patterns of groups serviced; and how beliefs within particular groups may differ depending on factors such as age, geography, religion, gender, sexual orientation, socioeconomic status, length of time away from country of origin, and educational attainment level
- Specific terminology, approaches, methods used in your field, e.g., health delivery systems in native country versus the U.S., if your organization provides health or human services, or comparative career paths for jobs in native country versus the U.S. for workforce development programs
- Issues of professionalism, ethics, and confidentiality—since many immigrant communities are small, it is very important for your staff to maintain confidentiality about the personal and work lives of your consumers. Appropriate dress, behavior, and motivation are also issues when interacting

with people of other cultures, who may find American informality offensive.

- Interpersonal and communication skills are critical. Staff needs to learn about the risks of using family members to interpret information or translate documents. They need to learn effective communication strategies for themselves and be given clear policy guidance about when they should, or should not, retain the services of a trained interpreter or bilingual staff.
- Overview of the organization's policy and procedures with regard to oral and written language services and materials
- Overview of the relevant provisions of Title VI of the Civil Rights Act of 1964
- Practice-based learning and improvement that help staff recognize their own personal biases and reactions to people different from themselves, and which provide them with concrete methods and skills for positive interaction

## ***Guideline #4***

***Organizations should ensure that every effort is made such that consumers receive effective, understandable, and respectful services, provided in the consumer's preferred language and in a manner sensitive to cultural beliefs and practices. (CLAS 1)***

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This guideline is a fundamental underpinning of all ten guidelines. Its purpose is to guarantee that all consumers receive services in a culturally and linguistically competent manner. This guideline pertains to staff, as well as to their organizations, who provide the management policies and systems that guide culturally competent interactions.

Respectful service means taking into account the values, preferences, and needs of the consumer. Often organizations develop a Consumer Bill of Rights and Responsibilities as a way of addressing issues of respect. For example, the American Nurses Association's Code of Ethics includes: respect for human dignity; honoring the uniqueness of the consumer; being sensitive to the social and economic status of the consumer; and maintaining a non-judgmental demeanor and sensitivity to the needs of the consumer.

Understandable services means communicating in the preferred language of consumers and guaranteeing that they understand all information. Full understanding of complex concepts, acronyms, and technical language are an essential part of providing understandable services.

Effective service will lead to satisfaction and positive results for consumers. Culturally competent services will involve: aiming to surmount cultural, language, and communications barriers; providing an environment in which consumers from diverse backgrounds feel comfortable; encouraging consumers to express their cultural practices and, when possible, integrating these approaches into service approaches. When necessary, it might also be appropriate to involve an advocate or ombudsman with experience in cross-cultural matters.

This guideline is best operationalized by complying with all the other guidelines. At a minimum, this would involve training staff and all personnel in cross-cultural education and assessing their skills through testing, direct observation, and consumer satisfaction surveys and performance reviews.

## ***Guideline #5***

***Organizations should provide language assistance services, including bilingual personnel and interpreter services, at no cost to each consumer with limited English proficiency, at key points of contact, in a timely manner that facilitates maximum access to services. (CLAS 4)***

This guideline is a mandate of Title VI of the Civil Rights Act of 1964 with regard to services to LEP individuals. “No person in the United States shall, on ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”<sup>3</sup> Because so many health and human services programs receive federal funds, sometimes passed through state agencies, this guideline should be treated as a mandate by most agencies.

Title VI stipulates that all organizations receiving federal financial assistance ensure that LEP individuals have meaningful access to the services they need. Meaningful access is accomplished through effective communication between the organization and the LEP person. Language services must be available to each LEP person who seeks services regardless of the size of the person’s language group in the service community. Optimally, language services should be provided by bilingual/bicultural personnel who communicate directly in the preferred language of the consumer. If this is not possible, interpretation should be offered by trained interpreters. Telephone interpreter services should be used as a supplemental system.

The U.S. Department of Health and Human Services issued guidance in 2001 about how it interprets discrimination. Health and human service providers who receive federal funds may not, directly, or through their contracts with others, on the ground of race, color, or national origin, take actions that have the effect of:

- Denying an individual any service or opportunity to participate in a program;
- Providing different services in a different manner to those provided to others;
- Subjecting an individual to segregation;
- Treating an individual differently from others in determining admission or eligibility for services;
- Denying an individual the opportunity to participate as a member of a planning or advisory body that is integral to a program.

The use of friends and family as interpreters is frowned upon in most settings. Research finds that the use of friends and family results in omissions, substitutions, and semantic errors that distort information. Often there are breaches of confidentiality that are particularly dangerous in health and mental health service delivery.

<sup>3</sup> 42 U.S.C § 200d. See also 45 C.R.F. § 80, app. A (1994). 65 Fed Reg. 52762-52774, August 30, 2000. [www.hhs.gov/ocr.lep](http://www.hhs.gov/ocr.lep)

Often these interactions upset hierarchical family relationships, such as when a child is asked to interpret sensitive information for a parent.

Critical to complying with this guideline is a clear understanding of the differing roles of bilingual/bicultural staff, interpreters, and translators. Bilingual/bicultural staff are usually native speakers who, when hired, have had their written and oral fluency in both English and their native language assessed thoroughly. They can communicate directly with consumers in their preferred language. Interpreters provide oral language services, and when trained, have received training in both consecutive and simultaneous interpretation skills. They have made a commitment to deliver language services that conform to ethical and professional standards of communication. Translation refers to the written word and is explained in more depth in the discussions of guidelines 6 and 7.

Generally speaking, best practice in the arena of language services calls on organizations to hire bilingual/bicultural personnel whenever possible. Bilingual/bicultural staff is best able to communicate directly with consumers in their first language. Of course, there are cases when organizations serve many language groups and cannot possibly hire bilingual/bicultural personnel in all languages. The second option is to hire or contract with trained interpreters. Telephonic interpreter services are the third, but less desirable, option when services are needed in an unusual or infrequently used language.

A good language services plan includes the following steps:

1. Identifying LEP individuals and groups who need language assistance.
2. Developing policy and procedures that describe the types of language services available (e.g., bilingual staff, interpreters, types of translated materials, telephonic interpretation) as well as how staff obtains those services when responding to consumer needs either in-person, by phone, or Internet.
3. Developing a process for recruiting bilingual staff, interpreters, and translators and verifying their language and cultural competency.
4. Developing a training curriculum and schedule that identifies staff who need to be trained, training them, and evaluating their progress toward learning goals.
5. Providing notice to LEP persons of the availability of language services as well as providing translated signage and vital documents.
6. Developing a process for data collection and ongoing evaluation of the language services with a mechanism for continuous quality improvement (e.g., tracking consumer language characteristics, interpreter scheduling, and utilization).

## ***Guideline #6***

***Organizations should provide to consumers in their preferred language both verbal and written notices of their right to receive language assistance services that are culturally appropriate. (CLAS 5)***

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This standard is a mandate of Title VI of the Civil Rights Act of 1964 with regard to services for LEP individuals.

LEP persons must be informed, in a language they can understand, that they have the right to free language services and that those services are available. This should be accomplished as part of a standard intake protocol. Intake personnel should be trained to solicit information about preferred language and interpreter or translator needs. This information should be entered in the organizational database and used to inform service delivery options for the consumer. Questions you might ask include: Is there a bilingual staff person available to communicate with this consumer? Do we need to find or hire an external interpreter? What telephonic interpreter services are available? How long will it take to secure interpreter services?

At every point of contact, organizations should also post translated signage and distribute notices about this right to free language assistance services in appropriate non-English languages. Organizations must ensure that all pertinent written, oral, and symbolic consumer and family materials (including consent forms, statement of rights forms, posters, signs, and audio tape recordings) are available in the languages of the consumer.

Many organizations use “I speak ...” cards that are pre-printed in many languages, allowing consumers to point to their language. Often these cards and/or other similar signs are posted at key points of contact in order to make sure that LEP individuals know that they can self-identify their language and ask for language assistance.

## ***Guideline #7***

***Organizations should make available easily understood consumer-related materials and post signage in languages of commonly encountered groups represented in the service area. (CLAS 7)***

This guideline is a mandate based on Title VI of the Civil Rights Act of 1964 with regard to services for Limited English Proficiency (LEP) individuals. Effective language assistance services include more than oral communication. Most organizations are awash with written materials that are routinely provided to English consumers—marketing materials, websites, program brochures, intake forms, consent forms. These materials help English speakers to gain access to services and make educated and informed decisions. The same materials and courtesy must be provided in commonly encountered languages.

“Commonly encountered languages are those that are used by a significant number or percentage of the population in the service area. Persons in language groups that do not fall within these guidelines should be notified of their right to receive oral translations of written materials.”<sup>4</sup>

A best practice in the translation of written materials, particularly forms, is a side-by-side bilingual format. This format ensures that both the service provider and the consumer can see and read a document together. It is a safeguard when forms are legal in nature that the most current form is in use. Qualified interpreters are essential in cases where consent is being obtained from the consumer. The interpreter must be able to communicate the intent of the consent process, which goes beyond reading and signing the consent form. If a patient is illiterate, a qualified interpreter would need to read and explain the translated text.<sup>5</sup>

Signage is another critical feature of language access. Signs should be in commonly encountered languages and should provide notices of a variety of rights, the availability of conflict and grievance resolution processes, and directions to facility services. Written materials should be responsive to the cultures, as well as the levels of literacy, of consumers. Organizations should provide notice of the availability of oral translations of written materials to LEP individuals who cannot read or who speak nonwritten languages.

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<sup>4</sup> National Standards for Culturally and Linguistically Appropriate Services in Health Care (CLAS): Final Report. U.S. Department of Health and Human Services Office of Minority Health, March 2001.

<sup>5</sup> Izabel Arocha, M.Ed. Cultural and Linguistic Educator. Cambridge Health Alliance. CLAS/Talk Listserv, Tuesday, June 9, 2009.

## ***Guideline #8***

***Organizations should partner with communities and utilize a variety of formal and informal mechanisms to advocate for, design, and implement language access and cultural competence activities. (CLAS 12)***

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It is very difficult to be linguistically and culturally competent without interacting with immigrant and refugee communities in ways that meaningfully engage their leadership. Structuring program development so that it is influenced and informed by community interests, expertise, and needs leads to better program strategies that are more likely to reach and engage the constituency. Exhibiting your interest in and awareness of the background, struggles, hopes, and fears of your target LEP group builds trust and encourages participation.

There are many informal and formal mechanisms for engaging community participation. First, it is important to survey your community, identifying cultural agencies, community organizations, churches, merchant organizations, and clubs that are led by immigrants and refugees or have significant experience serving a particular group. Once key organizations are identified, develop a plan for interviewing the leadership of these organizations about their communities. Ask them for the names of others they consider to be influential in their respective ethnic or cultural groups. Bring consumers together in focus groups, because sometimes group conversations are richer than those conducted one-on-one. You are looking for “inside” information about how each cultural group interacts, where they meet, what kinds of gatherings feel comfortable, what they like to do in their free time, and where they work. Eventually, you may decide to set up formal structures that seek to engage these “culture brokers” in consumer advisory groups, boards, or other ad hoc groupings.

For example, the Safe Schools/Healthy Students Initiative promotes collaboration with multiple stakeholders. Outreach strategies are designed to transmit messages that are meaningful, relevant, and communicate the concept of mutual benefit. Phone calls, flyers, and radio announcements take into account the educational and literacy levels of the audience, as well as the actual language spoken. Parents of school children are often reached through radio programs that discuss school-related issues rather than through written publications. Business owners are solicited with messages that explain how involvement might expand their client base. “Matching the medium to the message and the strategy to the intended recipient is key to successful community outreach.”<sup>6</sup>

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<sup>6</sup> National Center for Mental Health Promotion and Youth Violence Prevention; [www.promoteprevent.org](http://www.promoteprevent.org)

## ***Guideline #9***

***Organizations should ensure that conflict resolution processes are in place that can identify and resolve cross-cultural conflicts. (CLAS 13)***

Conflicts are inevitable in all organizations; adding widely divergent cultures and language to the mix increases the possibility of communication problems. Organizations can reduce conflict by anticipating issues that may arise and developing policies and procedures, as described in prior guidelines that put structure and form to the process of achieving linguistic and cultural competence. Including a simple grievance procedure with timely review and adjudication is important.

Among the steps organizations can take to fulfill this standard are providing LCC training to staff who handle complaints and grievances or other legal or ethical conflict issues; providing notice in other languages about the right of each consumer to file a complaint or grievance; providing the contact name and number of the individual responsible for disposition of a grievance; and offering ombudsperson services.

Other conflict-prevention measures include regular consumer satisfaction surveys, focus groups, staff-peer observations, and record review of LEP service patterns.

## ***Guideline #10***

***Organizations should make information available to the public about progress and successful innovations in implementing language and cultural competence guidelines and provide public notice in their communities of the availability of this information. (CLAS 14)***

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An essential element of language and cultural competence is public education—spreading the word about its importance and significance in the delivery of direct services to consumers. For individual organizations, sharing information about your efforts builds community support and linkages. In particular, it enables your organization to build ties with immigrant and refugee groups and to present a welcoming face. They, in turn, are more likely to offer expertise and understanding about customs, mores, and norms that can be very helpful in developing outreach and education strategies, and service delivery modalities that truly reach LEP populations.

Ethnic newspapers and radio stations, blogs, and websites are good vehicles for trumpeting organizational changes and new programs that have been developed to increase language and cultural access. Publishing marketing materials in multiple languages and releasing data or findings about your efforts to improve service outcomes for particular racial/ethnic groups also offer opportunities to market your programs and increase their visibility.

## RESOURCES

**Please note:** Many of the best resources for LCC can be found in the health sector. Often principles and practices are easily adapted to other non-health related services.

### **American Translators Association (ATA)**

225 Reinekers Lane, Suite 590  
Alexandria, VA 22314  
Telephone +1-703-683-6100  
Fax +1-703-683-6122  
[www.atanet.org](http://www.atanet.org)

### **Chicago Area Translators and Interpreters Association (CHICATA)**

Chicago: 312-836-0961  
[webmaster@chicata.org](mailto:webmaster@chicata.org)  
[www.chicata.org](http://www.chicata.org)

**DiversityRx** offers an active listserv of health providers interested in language and cultural competence issues. [CLASstalk-list@diversityrx.org](mailto:CLASstalk-list@diversityrx.org)

**Ethnomed** provides free access to patient education materials and information about numerous language and cultural groups.  
[http://ethnomed.org/patient\\_ed](http://ethnomed.org/patient_ed)

**Health Information Translations** offers patient information in 17 languages, on topics such as disaster preparedness, surgeries, pregnancy, and other subject areas.  
<http://www.healthinfotranslations.com>

**Healthy Roads Media** This portal houses materials in 18 different languages in many formats, including print materials, audio, multimedia, web video, and mobile video (iPod).  
<http://www.healthyroadsmedia.org>

### **Heartland Alliance Cross-Cultural Interpreting Services**

Chicago: 773-751-4094; 773-506-9872  
[ccis@heartlandalliance.org](mailto:ccis@heartlandalliance.org)  
[www.heartlandalliance.org/mcsc/programs/ccis.htm](http://www.heartlandalliance.org/mcsc/programs/ccis.htm)

### **International Language Services**

Chicago: 773-525-8590; 773-525-85 91  
[ilstranslations@sbcglobal.net](mailto:ilstranslations@sbcglobal.net)  
[www.ilschicago.com](http://www.ilschicago.com)

**Medline Plus** Health information in many languages and pertaining to many conditions and illnesses. Maintain high standards for source of material and quality of the translation.  
[www.medlineplus.gov](http://www.medlineplus.gov)

### **Midwest Association of Translators and Interpreters (MATI)**

(Membership IL, IN, WI)  
Chicago: 312-427-5450; 312-427-1505  
[moirapujols@aol.com](mailto:moirapujols@aol.com)  
[www.matiata.org](http://www.matiata.org)

### **The Migration Policy Institute Language Portal**

MPI provides analysis, development, and evaluation of migration and refugee policies at the local, national, and international levels. Includes database of articles and tools pertaining to language services, interpreting, and translation.  
[http://www.migrationinformation.org/integration/language\\_portal](http://www.migrationinformation.org/integration/language_portal)

**National Health Law Program (NHELP)** offers information on law and policy and has particular expertise around language services in health care.  
<http://www.healthlaw.org/library>

### **National Association of State Workforce Agencies**

*Checklist for Developing a Limited English Proficiency (LEP) Plan*  
[www.WorkForceATM.org](http://www.WorkForceATM.org)

**24 Languages Project** This effort from the Spencer S. Eccles Health Sciences Library has audio recordings and brochures in English as well as—you guessed it—24 other languages.  
<http://library.med.utah.edu/24languages>

### **The Refugee Health Information Network (RHIN®)**

Refugee health professionals provide quality multilingual, health information resources for those providing care to resettled refugees and asylees. <http://www.rhin.org/>