



COMPREHENSIVE COMMUNITY SERVICES POLICY AND PROCEDURES

SUBJECT: CULTURAL COMPETENCE AND LINGUISTIC SERVICES
DHS 36.07 (5)(h)

PURPOSE

The cultural competence and linguistic services (i.e. interpretation and translated documents) policy seeks to ensure that a CCS participant's cultural heritage and primary language are considered as primary factors when developing the CCS participant's recovery plan and that activities and services are accessible in a language in which the participant is fluent.

POLICY

It is the intent of the CCS program to offer services that are person-driven and individually resonant. By definition, this means that services offered must acknowledge and take into account the CCS participant's language, beliefs, customs and practices. CCS participants and their Service Facilitators will explore aspects of culture and language, to ensure that service plans reflect the CCS participants' values as well as their needs. Further, linguistic services will be provided within the CCS program any time they are needed to ensure that CCS participants are fully able to participate in their treatment services and recovery process.

Cultural Competence

1. CCS staff are expected to discuss, document and provide services in ways that are relevant and understandable to the CCS participant from their perspective.
2. The Service Facilitator will introduce the concept of culture and working across differences early on in the service relationship and will make it known that talking about cultural differences and wishes is welcomed.
3. Areas to be explored include:
 - Religion/spirituality
 - Socio-economic status of the person or family
 - Individual/family values
 - Race/ethnicity

- Sexual/gender identity
 - Preference of name and pronouns
 - Education
 - How their family or friends view their particular disorder or disability
 - Any other areas the person identifies as unique to themselves or family
4. The Service Facilitator will explain that exploring differences will help in deciding what interventions to employ toward reaching goals, and will aid the recovery team in working together.
 5. Cultural information regarding CCS participants will be gained over time. New information will be reflected in updates to the assessment and brought into reviewed and revised recovery plans.

Linguistic Services

1. Upon referral to CCS, the applicant and their guardian and/or caregiver will be asked about their language of preference, the degree of English proficiency, and any linguistic accommodations needed to participate in CCS services.
2. If a person interested in or enrolled in CCS (or their guardian and/or caregiver) does not speak English, has limited English proficiency, or is deaf or hard of hearing; a staff person who speaks the person's language, a qualified interpreter, or a certified language line will be utilized to ensure effective communication.
3. The CCS will provide, free of charge, all CCS documents necessary to its participants' meaningful participation in CCS services in alternative languages appropriate to the needs of the client population.
4. CCS participants shall not be charged for the cost to provide interpretive services or translated documents.
5. Utilization of family members or friends of CCS participants as interpreters is prohibited unless specifically requested by the CCS participant. Use of the CCS participant's minor child as an interpreter is never allowed.
6. It is the responsibility of each agency contracted with Dane County to provide CCS services to establish their agency policy and procedure around securing linguistic services for Dane County CCS participants.
7. Each CCS provider agency is responsible for securing needed linguistic services for any CCS participant that receives services from their agency to ensure effective communication. Each agency is responsible for the total cost of linguistic services provided to CCS participants they serve; the reimbursement

from Medicaid for interpretive services may not be fully sufficient to cover the cost.

8. It is strongly recommended, though not required, that providers work through professional agencies that can verify qualifications and skills of interpreters. Individuals providing interpretation services for CCS participants must meet the following qualifications:
 - a. Sign language interpreters must be licensed in Wisconsin under Wis. Stat. § 440.032 and must follow the specific requirements regarding education, training, and locations where they are able to interpret. The billing provider is responsible for determining the sign language interpreter's licensure and must retain all documentation supporting it.
 - b. Foreign language interpreters must be at least 18 years of age; demonstrate proficiency in English and another language; and be able to interpret effectively, accurately, and impartially, both receptively and expressively, using necessary specialized vocabulary.
9. If contracted CCS providers seek reimbursement for the provision of interpretive services, the following requirements must be met:
 - a. Interpretive service information must be entered correctly on the CCS progress note that documents the CCS service that was interpreted.
 - b. The interpretive service and the CCS service must be provided to the CCS participant concurrently--on the same date and at the same time.
 - c. Time billed for interpretive services must reflect time spent providing interpretation for CCS services to the participant. If a service provided by a non-CCS provider requires interpretive services, that provider should secure the interpreter and bear the cost (i.e. doctor, dentist, teacher, etc.)
 - d. At least three people must be present for interpreter services to be reimbursed—the CCS participant, the provider, and the interpreter.
 - e. The service provider and the interpreter cannot be the same person.
 - f. Interpreter time must be equal to or less than service time.
 - g. Interpreters may provide services either in person or via telehealth. Telehealth services must be functionally equivalent to an in-person visit.
 - h. Reimbursement for translation of written materials is not covered.
10. The following are not eligible for reimbursement via CCS progress notes:
 - a. Interpretive services provided in conjunction with a non-covered, non-reimbursable, or excluded service.
 - b. Interpretive services provided by the participant's family member.
 - c. The interpreter's waiting time and transportation costs, including travel time and mileage reimbursement, for interpreters to get to or from appointments.

11. CCS providers will alert the CCS Administrator if there are CCS documents that are needed in the primary language of the participant. CCS Administrator will facilitate obtaining translated CCS program document templates.

Approved by CCS Coordination Committee on January 15, 2025.

5.1.14, 9.3.14, 4.14.15, 11.14.24
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