

Limited English Proficiency Policy	
Version #: 7	Date Approved: 03/13/2026
Last Review: 03/13/2026	Expiration Date: 03/13/2027

**POLICY:**

Trilogy will take reasonable steps to ensure that clients with Limited English Proficiency (LEP) have meaningful access and equal opportunity to participate in services, activities, programs and other benefits. Language assistance will be provided using telephonic interpretation/ translation services. Clients may also receive services in their preferred language from bilingual employees. Employees that may have direct contact with clients with LEP will be trained in effective communication techniques, including the effective use of an interpreter. This policy applies across all Trilogy sites and Designated Collaborating Organizations (DCO).

Identifying LEP Persons and their Language at Point of Intake

Trilogy will identify the language and communication needs of clients with LEP at point of intake. If necessary, the employee will use a language identification card or pamphlets to determine the language. In addition, when records are kept of past interactions with clients or family members, the language used to communicate with the person with LEP will be included as part of the record.

Obtaining a Qualified Interpreter or Translator

If the employee is unable to speak the same language as the client, they will assist with the following:

- Obtain an outside interpreter via the use of telephonic services. Trilogy currently uses an outside telephonic service called Boostlingo that is a full-service language provider specializing in interpretation and translation services. Boostlingo can be accessed via the app or <https://app.boostlingo.com/ng/#/app/account/sign-in> Please contact the IT Department or your supervisor to be added as a user in Boostlingo as needed.

The above step will be taken for those individuals with LEP already connected to care within Trilogy as well as at intake to ensure effective communication between the employee and individual with LEP. Trilogy assigns clients to work with bilingual staff that speak the same language as the client for ongoing care when able to maximize the quality of care available to the client.

Some persons with LEP may prefer or request to use a family member or friend as an interpreter. Family members or friends of the person with LEP will not be used as interpreters given issues of competency of interpretation, confidentiality, privacy, and/or conflict of interest. Children and other clients will not be used to interpret to ensure confidentiality of information and accurate communication.

At the point of Intake, if an individual cannot be served appropriately or comfortably through translation or interpretation services, the employee will identify an appropriate referral, provide it

to the client, and document in the EHR record.

### Providing Written Translations

When translation of vital documents is needed, Trilogy will submit documents for translation into frequently encountered languages to the QA Department. The QA department will submit the original documents to an outside service for translation.

The facilities team will provide translation of other written materials and post them throughout the facility for individuals with LEP to ensure accurate information is shared regarding building and access updates.

Trilogy will set benchmarks for translation of vital documents into additional languages over time as needed.

### Providing Notice to LEP Persons

Trilogy will inform persons with LEP of the availability of language assistance by providing signage in languages LEP persons will understand. At a minimum, signage will be posted and provided in intake areas and other points of entry.

### Monitoring Language Needs and Implementation

On an ongoing basis, Trilogy will assess changes in demographics, types of services, or other needs that may require re-evaluation of this policy and its procedures. In addition, Trilogy will regularly assess the effectiveness of these procedures and make changes as needed. Trilogy will continue to assess the need to hire more bilingual staff within various levels of care to best meet the needs of clients served.

### CLAS Standards

Trilogy believes that the adoption of federal CLAS (Culturally and Linguistically Appropriate Services) standards is a critical step toward improving the quality of services provided to all individuals, which will ultimately help reduce health disparities and improve health equity.

To further this goal, Trilogy is currently adapting its Accessibility Plan to include a more specific focus on cultural and linguistic procedures related to the treatment needs of populations served by its CCBHC site. This updated Accessibility Plan will:

- Identify the cultural and linguistic treatment needs of the populations served through our sites and services provided from that location
- Outline the ways in which Trilogy will comply with federal CLAS standards, as described here:  
<https://thinkculturalhealth.hhs.gov/assets/pdfs/EnhancedNationalCLASStandards.pdf>
- Finalize methods to display CLAS standards for consumers in multiple ways, such as through visual aids and posters at our on-site locations, through our internal and external websites, and through materials disseminated in our new client paperwork

### Accessibility in Intake, Assessment and Treatment Planning

As evidenced in the LEP Policy, Trilogy commits to taking reasonable steps to provide meaningful access to services, such as language assistance, for those with LEP and/or language-based disabilities. This commitment to accessibility begins during the intake and assessment process but continues throughout treatment planning and the ongoing provision of clinical services.

We commit to:

- Providing appropriate and timely interpretation/translation services that meet the size/needs of our LEP CCBHC consumer population, as determined through regular coordination with clinical services providers, direct client feedback, and community needs assessments.
- To using interpreters that are specifically trained for medical setting. This includes providing ongoing training opportunities for bilingual staff working primarily within multi-lingual or LEP populations.
- To ensuring that LEP auxiliary aids and services are readily available, ADA-compliant, and responsive to the needs of people receiving services with physical, cognitive, and/or developmental disabilities (e.g., sign language interpreters, teletypewriter (TTY) lines).
- To ensuring that all documents or information vital to the ability of a person receiving services to access CCBHC services (e.g., registration forms, sliding scale fee discount schedule, after-hours coverage, signage) are available online and in paper format, in languages commonly spoken within the community served, taking account of literacy levels and the need for alternative formats.

As evidenced in the LEP Plan, we will continue to provide such materials at intake and throughout the time a person is served by the CCBHC.

### Confidentiality Requirements

Trilogy holds all employees, affiliated providers, and interpreters to a strict standard of confidentiality when working with LEP clients. See Trilogy's "Client Confidentiality Policy" for specific policies and procedures.

As detailed in this policy, all employees, including contracted staff, will be trained on client confidentiality and Trilogy's privacy policies at time of hire and on an annual basis. These trainings include, but are not limited to, the requirements of the Health Insurance Portability and Accountability Act (HIPAA) (Pub. L. No. 104-191, 110 Stat. 1936 (1996)), the IL Mental Health and Developmental Disabilities Confidentiality Act (740 ILCS 10/), 42 CFR Part 2, and other federal and state laws.

Moreover, any staff who participates in the provision of services to children and families must complete additional training regarding patient privacy requirements specific to the care of minors.

Staff are required to complete an annual attestation in Trilogy's L&D platform that indicates their understanding and acceptance of Trilogy's confidentiality and privacy requirements.