

Horizon Corporations Language Access Plan

Effective Date of Plan: 1/1/2024

In compliance with: New York State Executive Law Section 202-a, which established New York's statewide Language Access Policy, 45 CFR Section 1557 and OASAS LSB 2023-01: Language Access Services

This document is Horizon's Language Access Plan. A Language Access Plan explains how we provide services to people who have limited English proficiency.

The Limited English Proficient (LEP) Population in Horizon's Service Area

The Statewide Language Access Policy requires state agencies to translate vital agency documents into the top twelve (12) most commonly spoken non-English languages among limited English proficient New Yorkers. The Office of Addiction Services and Supports (OASAS) uses U.S. Census data (including data from the American Community Survey) to determine the top twelve (12) languages most commonly spoken by LEP individuals in New York State. The top 12 languages spoken by LEP individuals in New York State are: Spanish, Chinese, Russian, Yiddish, Bengali, Haitian Creole, Korean, Italian, Arabic, Polish, French, and Urdu.

According to Stacker.com, the most common languages spoken in the Greater Buffalo and surrounding areas are: Spanish, Arabic, Mandarin, Cantonese, Bengali, and Cajun French.

Horizon contracts with several translation and interpretation services including Language Scientific, the International Institute of Buffalo, and Journey's End Refugee Services for languages translation and interpretation, as well as Deaf Access Services and Service Bridges for American Sign Language Interpretation.

- Language Scientific is based all over the world and provides on-demand Telephone Interpreting services. Users may access an interpreter in more than 150 languages on a 24/7 basis, 365 days of the year.
- Journey's End Refugee Services is local to Buffalo, NY and is a community-based organization with the mission of assisting refugee populations. They offer in-person, telephonic, and telehealth interpretation services in over 45 languages.
- The International Institute of Buffalo is local to Buffalo, NY and provides reliable, quality foreign language interpretation in more than 100 languages and by multiple delivery methods: in-person, video and telephonic. Interpretation services may be requested for any time, 24/7, independent of the Institute's business hours.

Public Outreach and the Availability of Language Access Services

Our agency informs LEP individuals about their right to free language assistance services in the following ways, using at least the top 12 languages shown above:

- LEP individuals are directly informed by our staff
 - "I Speak" posters at the clinic front desk
 - "I Speak" notice on waiting room television screen
 - Information about Horizon's plan is published on the Horizon corporate website horizon-health.org

- Other external communications:
 - Electronic communication (email or text) to current patients
 - Social media posts
 - Outreach to the community through Social Impact initiatives

Provision of Language Access Services

Prior to the first visit, at initial contact, the Patient Engagement Center (PEC) team asks patients about their language preferences if they were not already indicated via the website appointment request. PEC will notify staff who will be interacting with the patient at the next service.

During in person encounters, Horizon uses the following tools to determine LEP, and what a patient's primary language is:

- "I Speak" poster at the clinic front desk
- Administrative staff making determinations based on speaking with the patient at the clinic front desk
- Use of language translation services

During telephonic or virtual encounters, Horizon uses the following tools:

- Staff making determinations based on speaking with the patient
- Use of language interpretation services

Horizon has the following language translation services available upon request at no cost to the patient:

Provider	Telephone	Telehealth (Audio-Visual)	In-person
Language Scientific	Yes	No	No
The International Institute	Yes	Yes	Yes
Journey's End	Yes	Yes	Yes
Deaf Access Services (ASL only)	N/A	Yes	Yes
Service Bridges (ASL only)	N/A	No	Yes

Patients may also choose to utilize a family member, friend or other person as an interpreter. Horizon staff will determine clinical appropriateness of that person as an interpreter and ensure a written authorization is obtained for that individual.

Instructions and resources for using language interpretation and translation services are available to all employees on the Horizon Intranet under Clinical Services – Clinical Resources – Interpreter Services. A Language Access email group with key staff from Clinical Services, QI, DEIB and Marketing is available for questions.

Confidentiality

Horizon ensures confidentiality with language access in the following ways:

- Staff employed by Horizon must adhere to state and federal confidentiality laws, rules and regulations, including 42 CFR Part 2, regarding service provision.
- Under a Service Agreement, a contract with any language access service is similarly bound by state and federal confidentiality rules in relation to information about any individual, including LEP individuals receiving services from Horizon. Independent interpretation vendors will internally enforce standards of confidentiality in accordance with state and federal laws, rules and regulations.

Translation of Documents

Horizon utilizes OASAS's list of vital documents on its website to provide translation for any OASAS required documents. Other documents can be translated on an as-needed basis by the International Institute of Buffalo or Journey's End Refugee Services, as mentioned above. Horizon will ensure that plain language is used in materials produced before translation to ensure information is accessible to a range of literacy levels. Additionally, Horizon's Corporate Website has the ability to be translated into over 100 languages providing accessibility for viewing services.

Staff Training and DEIB Considerations

Horizon trains staff and fosters cultural humility specifically for language access among staff in the following ways:

- Ignite video training for all staff
- Periodic screen saver reminders on company-issued computers
- Periodic all company newsletter reminders about services available

Where Horizon utilizes independent interpreting and translating services, that vendor will implement internal quality assurance standards to ensure that its staff are trained for cultural appropriateness and linguistic competence.

Monitoring

Horizon's Quality Improvement Department will monitor implementation of the plan for compliance. Ongoing review of the plan will occur at least quarterly during the Clinical Operations Committee meeting. Any concerns from monitoring or changes to the plan will be reported to the Compliance Committee during quarterly meetings.

Complaints

Complaints regarding Horizon's language access can be made in the following ways:

- A contact form to connect with the language access email group (described above) is provided on the Horizon corporate website.
- In-person at any Horizon location. Staff receiving the complaint will send information to the language access email group.

Based on the nature of the complaint, the appropriate personnel will work with the complainant on a resolution.