

APPENDIX C: PROCEDURES FOR USE OF FOREIGN LANGUAGE INTERPRETATION AND TRANSLATION SERVICES

DEFINITIONS

Early Intervention Services under Part C of IDEA include Foreign Language Interpretation and Translation. These services are critical to ensuring the family can fully participate in IDEA/Part C and their rights and safeguards are protected.

The role of the interpreter/translator is to facilitate communication between Early Intervention Service (EIS) providers and the family when they do not speak the same language. These services may be required during the rendering of IDEA/Part C services in order to communicate with the child and family. Interpretation refers to the restating in one language of what has been said in another language. Interpretation involves conveying both the literal meaning and connotations of spoken and unspoken communication.

Translation refers to putting the words of one language into another language, particularly in written form. Unless otherwise specified, all requirements for EIS providers in the Procedures for the Comprehensive System of Personnel Development (CSPD) apply to providers of Foreign Language Interpretation and Translation services. These procedures establish the qualifications and training requirements of all EIS providers.

RESPONSIBILITIES OF SERVICE COORDINATORS AND EIS PROVIDERS FOR FOREIGN LANGUAGE INTERPRETATION/TRANSLATION SERVICES

- IDEA/Part C services must be approved by the child's Individualized Family Service Plan (IFSP) team and placed on the IFSP in advance of the service being delivered.
- The Service Coordinator adds the need for Interpreter/Translator services when other Part C services are added to IFSP. The Service Coordinator also adds the expected frequency and duration of interpretation/translation services to be provided to the IFSP.
- The Service Coordinator will list IDEA/Part C as Payor 1 for foreign language interpretation and foreign language translation.
- The service is added to the Planned Services section of the IFSP, and the provider is given an Interpreters Services Log with the top portion completed by the Service Coordinator (see responsibilities of interpreters and translators below for additional information).
- The Service Coordinator will add additional time for offsite support for service coordination activities on planned services of the IFSP to accommodate rescheduling appointments or for immediate communication with the family/caregiver. For example, if the number of hours for service coordination services on the IFSP is 1 hour/week, the number hours for foreign language translation/interpretation services should be 2 hours/week.
- To the maximum extent possible, Service Coordinators and other EIS providers will attempt to use the same interpreter for all their transactions for interpretation consistency and to reduce potential interpreter distortions.
- Service Coordinators will contact their assigned Regional Coordinator for assistance when foreign language interpretation or translation services is needed, and a qualified provider is not available.

RESPONSIBILITIES OF INTERPRETERS AND TRANSLATORS

- Enrolling as an EIS Provider. BabyNet enrollment requirements can be found here: <https://msp.scdhhs.gov/babynet/site-page/babynet-provider-enrollment>
- Treating all information learned during the interpretation as confidential and not divulging any information obtained through any assignments, including but not limited to information gained through interviews or access to documents and other written materials.
- Transmitting the message in a thorough and faithful manner, considering linguistic variations in both languages, and conveying the tone and spirit of the original message. A word-for-word interpretation may

not convey the intended idea. The interpreter/translator must determine the relevant concept and say in a language that is readily understandable and culturally appropriate to the listener.

- During meetings, ask the EIS provider and/or family to clarify unfamiliar or confusing words, terms, meanings, etc. The interpreter should not attempt to interpret when he or she is not clear about what is being said.
- Explain cultural differences or practices to the provider(s) and clients when appropriate.
- Interpret everything accurately, even if the interpreter/translator disagrees with what is being said or thinks it is wrong, a lie, or immoral.
- Not influencing the opinion of the client(s) by offering them advice as to what action to take during or after the interpreting/translating assignment.
- Treat each client equally, and with dignity and respect regardless of race, color, gender, religion, nationality, age, political persuasion, or life-style choice.
- Developing and maintaining an Interpreters Services Log, with the top portion to be completed by the Service Coordinator. The log will be made available to IDEA/Part C State Office upon request.
- After the of delivery of each service requiring interpretation, the interpreter will ask the EIS provider to sign the Interpreters Service Log to verify the interpretation took place.
- At the end of the IFSP authorization period, the interpreter will keep a copy of the Interpretative Services Log, signed by the interpreter, for their records in case of audit.
- If the service is an offsite service (i.e., telephone conversation, translation of the IFSP, etc.) the interpreter will list the EIS provider requesting the service in the professional verification block on the Interpretative Services Log.

NOTE: Interpreters are permitted to translate written text from one language to another only after providing proof of certification or other testing to the IDEA/Part C State Office.

LIMITATIONS AND NON-COVERED ACTIVITIES AND SERVICES

- Interpreters/Translator services are ONLY to be used in conjunction with IDEA/Part C services listed on IFSP (e.g., interpretation during a physical therapy visit that is listed on the IFSP). Interpreters/Translators must be listed on the child's IFSP by the Service Coordinator prior to providing any services.
- IDEA/Part C will NOT pay for interpreter/translator services for routine doctor's visits, visits to DSS, or other agencies to apply for services, services during hospitalizations, etc.
- Travel time to and from the site where the service is provided may not be counted as billable hours.
- Interpreter/Translator services that would otherwise be provided at no charge to the family or bilingual interpretation by the same person rendering an IDEA/PART C service are not covered.
- **The following are NOT Medicaid-reimbursable activities/services. For additional guidance, please visit the appropriate Medicaid Manual at <https://scdhhs.gov/provider-manual-list>.**
 - o Foreign language translation of non-IFSP documents such as applications for Supplemental Security Income (SSI), Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), Medicaid, etc.
 - o Foreign language interpretation for services listed in the "Other Services" section of the IFSP.

PAYMENT

BabyNet does not process payments internally. All Foreign Language/Interpreter claims submitted to the South Carolina Department of Health and Human Services (SCDHH) via BRIDGES will be processed and submitted for payment. It may take up to 30 days for Automated Clearing House (ACH) payments to be received. Non-ACH payments may take longer to be received. All providers are strongly encouraged to sign-up for direct deposit at <https://treasurer.sc.gov/ach>.