



*Please note: pursuant to decisions by various district courts regarding the 2024 Final Rule implementing Section 1557, entitled Nondiscrimination in Health Programs and Activities, 89 Fed. Reg. 37,522 (May 6, 2024) ("2024 Final Rule"), certain provisions regarding gender identity are stayed nationwide. Other provisions are stayed or enjoined as indicated at [www.hhs.gov/1557](http://www.hhs.gov/1557).*

Isabella Citizens for Health will take appropriate steps to ensure that communications with individuals with disabilities, including persons who are deaf, hard of hearing, blind, have low vision, or who have other sensory or manual disabilities, are as effective as communications with others. The procedures outlined below are intended to ensure Isabella Citizens for Health staff effectively communicate with individuals (including companions with disabilities) regarding their medical conditions, treatment, and participation or potential participation in our programs, activities, services, and other benefits.

These procedures also apply to, among other types of communication, verbal or written communication of important information, including information contained in documents such as waivers of rights, consent to treatment forms, financial and insurance benefits forms, etc. Isabella Citizens for Health shall furnish appropriate auxiliary aids and services, where they are necessary, to allow individuals with disabilities an equal opportunity to participate in and benefit from our programs, activities, services, and other benefits. When auxiliary aids and services are necessary for an equal opportunity to participate and benefit, they will be provided in a timely manner without cost to the individual(s) being served. Auxiliary aids and services include, but are not limited to, qualified interpreters, large print materials, acquisition or modification of equipment or devices, or other similar services or actions.

Isabella Citizens for Health is not required to take any action that would result in a fundamental alteration in the nature of the health program and activity or undue financial and administrative burdens.

Isabella Citizens for Health shall take appropriate steps to ensure that staff who may have direct contact with individuals with disabilities effectively communicate with individuals with disabilities, including through the effective use of interpreters and other appropriate auxiliary aids or services.

Contact information for the Section 1557 Coordinator(s) responsible for coordinating the effective communication procedures set forth in this document are:

Rachel Blizzard, Chief Operating Officer or Missy Dorwin, Director of HR & Compliance  
989-953-5191

#### 1. IDENTIFICATION AND ASSESSMENT OF NEED:

Isabella Citizens for Health staff members must identify individuals with disabilities who need appropriate auxiliary aids and services to communicate with individuals with disabilities effectively. Isabella Citizens for Health staff may identify individuals with disabilities through observation, inquiries to the individuals, and/or by consulting an individual's existing medical record to see whether it indicates the individual has a disability and needs auxiliary aids or services to ensure effective communication. Individuals with disabilities may self-identify their need for effective communication via appropriate auxiliary aids and services. Staff will consult with the individual to determine what auxiliary aids and services may be necessary to communicate with them effectively.

Staff will document the individual's preferred auxiliary aid or service in the individual's record, including any auxiliary aids and services necessary to communicate with companions, and such documentation will identify the individual's or their companion's preferred auxiliary aids and services, the actual aids and services provided if different from preferred aids and services.

## 2. PROVISION OF AUXILIARY AIDS AND SERVICES:

Isabella Citizens for Health shall provide, free of charge, the appropriate auxiliary aids or services when necessary to afford individuals with disabilities an equal opportunity to enjoy the program, activities, services, and other benefits:

Isabella Citizens for Health partners with Language Line Solutions to provide sign language interpretation and other language services as needed to facilitate effective communication.

### 2A. FOR PERSONS WHO ARE DEAF OR HARD OF HEARING

To ensure effective communication with individuals who are deaf or hard of hearing, Isabella Citizens for Health utilizes an interpreter service to ensure communication with individuals with disabilities are as effective as communications with others.

(i) For persons who are deaf/hard of hearing and who use sign language as their primary means of communication, when an interpreter is necessary to provide an equal opportunity to participate in or enjoy our program, activities, services, and other benefits, Isabella Citizens for Health will provide one. Isabella Citizens for Health utilizes an interpreter service, which provides qualified interpreters who, via a video remote interpreting service (VRI), can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

The contact information for the interpreter service provider is 989-756-0297.

VRI services are provided via tablet. Isabella Citizens for Health staff will assist in setting up the appropriate service on the tablet to ensure smooth, effective communication.

Staff will document the use of the interpreter service used to effectively communicate with the individual in the individual's record. If the individual returns, staff will not require the individual to repeat the request or recall the auxiliary aid and/or service previously utilized. Instead, staff will confirm with the individual whether the auxiliary aid and/or services previously provided are still needed.

(ii) Communicating by Telephone with Persons Who Are Deaf or Hard of Hearing

(a) Isabella Citizens for Health provides communication support for individuals who are deaf or hard of hearing by offering sign language assistance through a tablet set up specifically for VRI (Video Remote Interpretation) when applicable. Staff may also assist by reading documents aloud in a one-on-one setting to ensure clear and accessible communication.

If necessary, staff may contact the staff member(s) responsible for coordinating the language access procedures for any additional assistance regarding our resources to effectively communicate with individuals with disabilities over the phone.

Staff will document the use of the method of telephone communication used to effectively communicate with the individual in the individual's record. If the individual returns, staff will not require the individual to repeat the request or recall the auxiliary aid and/or service previously utilized. Instead, staff will confirm with the individual whether the auxiliary aid and/or services previously provided are still needed.

(iii) Some persons who are deaf or hard of hearing may prefer or request to use an adult that accompanies them to communicate with Isabella Citizens for Health. Isabella Citizens for Health may rely upon the adult that accompanies the individuals with a disability to communicate with the individual only after we have effectively communicated to the individual that we are willing to provide them appropriate auxiliary aids and services, including an interpreter, free of charge. Additionally, Isabella Citizens for Health will not rely on an adult accompanying an individual with a disability to interpret or facilitate communication except:

(a) In an emergency involving an imminent threat to the safety or welfare of an individual or the public where there is no interpreter available (for example, directly following a natural disaster such as an earthquake); or

(b) Where the individual with a disability specifically requests that the accompanying adult interpret or facilitate communication, the accompanying adult agrees to provide such assistance, and reliance on that adult for such assistance is appropriate under the circumstances.

Staff will document that we permitted an accompanying adult to effectively communicate with the individual in the individual's record. Auxiliary aid and/or service that are provided to an individual when they first contact Isabella Citizens for Health should again be made available to that individual if the individual returns to Isabella Citizens for Health, unless the individual confirms that they no longer require the auxiliary aid and/or service.

(iv) Isabella Citizens for Health will not rely on a minor child to interpret or facilitate communication, except in an emergency involving an imminent threat to the safety or welfare of an individual or the public where there is no interpreter available (for example, directly following a serious car accident where, due to the nature of the injuries sustained by an individual with a disability, critical care is a priority).

Staff will document the use of a minor child to effectively communicate with the individual in the individual's record.

If it would be inappropriate to rely on the adult accompanying an individual with a disability for any of these reasons, staff will arrange alternative auxiliary aids and services, including interpreter services, free of charge.

## 2B. FOR PERSONS WHO ARE BLIND OR WHO HAVE LOW VISION

(i) Isabella Citizens for Health staff will ask for the individual's preferred communication method(s).

(ii) Isabella Citizens for Health staff will assist individuals who are blind or have low vision fill out forms when necessary to afford those individuals an equal opportunity to participate in and benefit from our programs, activities, services, and other benefits.

(iii) Isabella Citizens for Health staff will provide written documents and materials to an individual who is blind or has low vision in a timely manner in an appropriate alternate format, including converting written documents, such as materials concerning treatment, benefits, services, waivers of rights, and consent to treatment forms, to large print, Braille, audio recordings, and/or to an electronic format, when necessary to afford persons an equal opportunity to participate in and benefit from our programs, activities, services, and other benefits unless it would be a fundamental alteration or undue burden. These alternately formatted documents may be obtained by contacting.

(iv) Staff are available to communicate the information contained in important written documents, including materials concerning treatment, benefits, services, waivers of rights, and consent to treatment forms by reading aloud and explaining these forms to persons who are blind or have low vision when necessary to ensure effective communication.

Staff will document the alternate format used to effectively communicate with the individual in the individual's record. Auxiliary aid and/or service that are provided to an individual when they first contact Isabella Citizens for Health should again be made available to that individual if the individual returns to Isabella Citizens for Health, unless the individual confirms that they no longer require the auxiliary aid and/or service.

## 2C. FOR PERSONS WITH SPEECH DISABILITIES

To ensure an individual with speech impairments or disabilities has an equal opportunity to participate in our program, activities, services, and other benefits, staff will confirm which auxiliary aids and services the individual prefers and then provide appropriate auxiliary aids and services, if available, to the individual in a timely manner.

Staff will document the alternate format used to effectively communicate with the individual in the individual's record.

Auxiliary aid and/or service that are provided to an individual when they first contact Isabella Citizens for Health should again be made available to that individual if the individual returns to Isabella Citizens for Health, unless the individual confirms that they no longer require the auxiliary aid and/or service.

## 2D. FOR PERSONS WITH OTHER TYPES OF DISABILITIES

Isabella Citizens for Health staff will provide each individual with a disability with necessary auxiliary aids and services sufficient to afford an equal opportunity to participate in our programs, activities, services, and other benefits. Staff will give primary consideration to the request of the individual with a disability in determining which auxiliary aids and services to provide and will provide the necessary auxiliary aids and services to the individual in a timely manner.

If an individual with a disability requires an auxiliary aid or service that is not readily available, staff shall contact the staff member responsible for coordinating the provision of auxiliary aids and services for individuals with disabilities to arrange for the timely provision of the necessary auxiliary aid or service.

Staff will document the auxiliary aids and services used to effectively communicate with the individual in the individual's record. Auxiliary aid and/or service that are provided to an individual when they first Isabella Citizens for Health should again be made available to that individual if the individual returns to Isabella Citizens for Health, unless the individual confirms that they no longer require the auxiliary aid and/or service.

## 3. TRAINING

Isabella Citizens for Health will ensure that all relevant staff are trained on the requirements for effective communication as set forth in this document.