



Language Access and Healthcare Interpreter Policy and Procedures

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Department: Customer Service	

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1. PURPOSE

- 1.1.** Advanced Health is committed to the facilitation of clear, understandable, and high-quality communication between staff, providers, and Members so that all Members can fully access healthcare services. The organization is committed to providing translation and interpretation services whenever they are needed to ensure quality of care and quality of communication. Advanced Health has Healthcare Interpreters (HCI) and other language access services available for provider and Member's translation needs.

2. SCOPE

- 2.1.** These Language Access and Healthcare Interpreter Services Policies and Procedures apply to Advanced Health's communications, including sign language, oral and written forms of communication, with Members,

Potential Members and our Provider Network. This Policy and Procedure applies to Advanced Health and all its downstream entities.

3. ACRONYMS AND DEFINITIONS

- 3.1.** Unless otherwise defined, all uppercase words will be defined the same as in the CCO Contract.
- 3.2.** Interpretation: Conveys meaning of the spoken word from one language to another.
- 3.3.** Translation: Deciphers meaning of the written word from one language to another
- 3.4.** Member: Client who is enrolled with Contractor under the Contract. CCO: Coordinated Care Organization
- 3.5.** LEP: Limited English Proficiency: a person who, by reason of place of birth or culture, speaks a language other than English and does not speak English with adequate ability to communicate effectively with a health care provider.
- 3.6.** OHA: Oregon Health Authority
- 3.7.** Certified Health Care Interpreter: an individual who has been approved and certified by the Oregon Health Authority as a Health Care Interpreter
- 3.8.** Qualified Health Care Interpreter: an individual who has received a valid letter of qualification from the authority to be a Health Care Interpreter
- 3.9.** Health Care: medical, surgical or hospital care or any other remedial care recognized by state law, including physical and behavioral health care.
- 3.10.** Health Care Interpreter: an individual who is readily able to:
 - (a) Communicate with a person with Limited English Proficiency;
 - (b) Accurately interpret the oral statements of a person with limited English proficiency, or the statements of a person who communicates in sign language, into English;
 - (c) Sight Translate documents from a person with limited English proficiency;
 - (d) Interpret the oral statements of other persons into the language of the person with Limited English Proficiency or into sign language; and
 - (e) Sight Translate documents in English into the language of the person with Limited English Proficiency.
- 3.11.** Sight Translate: to translate a written document into spoken or sign language. [Formerly 409.615; 2015 c.318 §1]

4. POLICIES

- 4.1.** Advanced Health will ensure that Members, and Potential Members, with LEP, or needing alternative formats, have meaningful and equitable access to participate in their healthcare services, activities, programs, and other benefits.
- 4.2.** All interpreters, translators, and other aids needed to comply with this policy shall be provided without cost to the person being served, and Members/patients and their families will be informed of the availability of such assistance free of charge.
- 4.3.** Language assistance will be provided with the use of Qualified, Certified, and/or licensed interpretation services, translation services, or technology and telephonic interpretation services.
- 4.4.** Advanced Health shall not discriminate against individuals eligible to enroll on any basis or use any policy or practice that has the effect of discriminating against individuals eligible to enroll on any basis, including: age, disability; national origin, primary language, and proficiency of the English Language; race, religion, color; sex, sex characteristics, sexual orientation, gender identity, or sex stereotypes; Pregnant or related conditions; or health status or need for services
- 4.5.** All staff will be provided with notice of this policy and procedure, and staff that may have direct contact with individuals with LEP will be trained in effective communication techniques, including the effective use of an interpreter. Advanced Health will train the Provider Network on how to access these services.

- 4.6.** Advanced Health will conduct a regular review of the language access needs of our Member population, as well as update and monitor the implementation of this policy and these procedures.
- 4.7.** Advanced Health must send materials in a Member's preferred language for all prevalent, non-English languages in the service area. For all other languages, translations must be provided when a Member request is received. "Prevalent, non-English language" is defined in [OAR 410-141-3575 \(1\) \(h\)](#) as the lesser of 5% of the Advanced Health's total enrollment or 1,000 Members. Currently the CCO does not have a prevalent non-English language in its service area.

5. PROCEDURES

5.1. IDENTIFYING PERSONS WITH LEP AND THEIR LANGUAGE

The Healthcare provider office will promptly identify the language and communication needs of the person with LEP. If necessary, staff will use a language identification card (or "I speak cards," available online at www.oregon.gov/oha) or posters to determine the language. In addition, when records are kept of past interactions with Members/patients or family Members, the language used to communicate with the person with LEP will be included as part of the record.

- 5.1.1.** Advanced Health will make every effort to identify the language preferences and needs of members and potential members.

5.1.1.1. Members will be assessed for any language or assistance needs via the Health Risk Assessment Survey upon Enrollment to the CCO, upon incoming and outgoing calls, and Care Coordination.

5.2. OBTAINING A CERTIFIED or QUALIFIED INTERPRETER

- 5.2.1.** The information for interpretation services and other accommodations is posted on Advanced Health's website, in the Member Handbook, and is included in written notices to Members. Members with disabilities who cannot access this information will be provided auxiliary aids in services as described above at no cost.

- 5.2.2.** Advanced Health provides access to oral interpretation of all languages via the Language Line.

5.2.2.1. Services provided include over-the-phone interpretation, video interpretation, and document translation.

5.2.2.2. Language Line usage is monitored monthly by the Director of Member Services through invoices which show utilization of each Potential service described above.

5.2.2.3. All Advanced Health providers have access to utilize the Language Line service.

- 5.2.3.** For Spanish language Interpretation, Advanced Health offers interpretation services either by phone, on-site, or deployed to requested location, through Qualified or Certified Health Care Interpreters. Please see attachment 9.1 for steps for Members or health care providers to request a Health Care Interpreter.

- 5.2.4.** Some persons with LEP may prefer or request to use a family member or friend as an interpreter. Advanced Health does not recommend the use of family members or friends of the person with LEP as interpreters unless specifically requested by that individual and after the person with LEP has understood that an offer of an interpreter at no charge to the person has been made by the facility. Such an offer and the response should be documented in the person's file. Children and other clients/patients/family members should not be used to interpret, in order to ensure confidentiality of information and accurate communication.

5.3. PROVIDING WRITTEN TRANSLATIONS –

Informational materials developed by Advanced Health shall meet the language requirements of, and be culturally sensitive to the OHP Membership, including Members with disabilities or reading limitations, and including populations whose primary language is not English.

5.3.1. Advanced Health makes written information available in prevalent non-English languages and in alternative formats upon Member request at no cost. These requests may be made by sources other than Members and potential Members, including family members and caregivers.

5.3.1.1. Materials made available in alternative formats and through provision of auxiliary aids and services will take into consideration the special needs of Members with disabilities or limited English proficiency.

5.3.2. At minimum, the information materials that are required to be translated into the prevalent non-English languages are: Advanced Health Member Handbook and welcome materials, Provider directory, appeal and grievance notices, denials and termination notices, and notices of changes in OHP benefits and other significant changes.

5.3.2.1. Advanced Health contracts with the Language Line Inc. to translate needed documents for Members at no cost to the Member.

5.4. PROVIDING NOTICE TO LEP Members—

Advanced Health will inform Members with LEP of the availability of language assistance, free of charge, by providing written notice in languages Members with LEP will understand. At a minimum, notices and signs will be posted and provided in intake areas and other points of entry, including but not limited reception and intake area. Notification will also be provided through one or more of the following: Member materials/mailings, Member handbook, outreach documents, and/or provider offices. Advanced Health's primary phone greeting includes directions for obtaining an interpreter free of charge.

5.5. MONITORING LANGUAGE NEEDS AND IMPLEMENTATION—

On an ongoing basis, Advanced Health will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, Advanced Health will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by Members with LEP, feedback from providers, patients/Members and community organizations, as well as recommendations from Oregon Health Authority (OHA) and other agencies.

6. REFERENCE SOURCES

6.1. Certified Commission for Healthcare Interpreters (cchicertification.org)

6.2. [ORS 414.591\(12\)-Coordinated Care Organization Contracts](#)

6.3. [OAR 410-141-3705 \(11\) \(21\)-Criteria for CCO's](#)

6.4. [OAR 410-141-3515 \(12\)-Network Adequacy](#)

6.5. [OAR 410-141-3585 \(2\)\(4\)\(b\)-MCE Member Relations: Education and Information](#)

6.6. [OAR 410-141-3590 \(2\)\(a\)-MCE Member Relations: Member Rights and Responsibilities](#)

6.7. [OAR 410-141-3575 \(1\) \(h\)-MCE Member Relations: Marketing](#)

6.8. [42 CFR 438.10 -Information Requirements](#)

6.9. Advanced Health Coordinated Care Organization Contract with Oregon Health Authority Exhibit B, Part 3, 2

7. RESPONSIBILITIES

7.1. The Director of Member Services will monitor compliance of language access services and healthcare interpretation through review of the CCO Interpretation Activity Log, review of the monthly utilization report from the Language Line On Demand and InSight Video Program, and review of the CCO's membership for identification of Member's preferred language.

7.2. The Customer Service Manager will monitor Customer Service Representative training on language access upon hire and annually and monitor the CCO healthcare interpreter certifications. Customer Service phone calls will be audited for compliance to language access policies and procedures.

- 7.3.** The Director of Member Services and the Customer Service Manager will ensure CCO education on available language access aids through offering an annual Language Access presentation. Member education will be provided through the Member Handbook, Community meetings including the CAC, and through the language access tagline on all Member communications.
- 7.4.** The Provider Relations Representative will provide education and training of available aids through Provider Orientations, the Provider Manual, and distribution of the CCO's Healthcare Interpreter Services Guide.
- 7.5.** The Quality and Risk Adjustment Manager will monitor adherence to language access and healthcare interpretation through quarterly meetings with the Director of Member Services.

8. RELATED DOCUMENTS

- 8.1.** None

9. ATTACHMENTS

- 9.1.** <https://cchicertification.org/>
- 9.2.** How to request a Health Care Interpreter

10. HEALTH EQUITY IMPACT ASSESSMENT TOOL

(If question does not apply, answer "Does Not Apply")

10.1. Does the policy advance equity and what are the intended outcomes? How? If not, does it have the potential to ignore or worsen existing disparities or produce other unintended consequences, should this policy be enacted? If so, what mitigation should be planned?	Yes, this policy assures all Members and potential Members receive communication in a way they need by making sure assistance is available via interpreters, translators, and additional aids.
10.2. Was there equitable involvement in the drafting or revision process? How have you included those impacted in the process? Who else should be involved? Who is the focus and who may be being left out?	This policy is based on OHA guidelines and state/federal laws. Listening sessions have been completed by the Director of Member Services to assess barriers and needs. All LEP individuals are informed of services and aids. Feedback from CAC, providers, and members is sought through various means on an ongoing basis.
10.3. What are the potential equity-related disparate impacts of this policy, practice, or decision? How might this policy have a disproportionate impact, negatively or positively on those historically underrepresented or excluded? How does this policy, practice or decision perpetuate or help to dismantle historical or other barriers to equity?	Members who do not have a mailing address or phone may be underrepresented. To counteract this the CCO educates Network providers and community partners to help inform this underrepresented population of the resources available.
10.4. What accountability, infrastructure and resources are required to implement the policy?	Maintaining a Qualified/Certified interpreter. Contracting with a service provider such as the Language Line for interpretation and translation services.
10.5. What is the plan to evaluate and monitor the policy, practice, or decision to ensure equity in the short- and long-term?	As outlined above in responsibilities, current ongoing tasks have been assigned. Continued collaboration with the Quality Dept and the Equity Policy Analyst will ensure the continued improvement to all.

11. APPROVALS					
11.1 – Document Owner	Name and Title: Lisa Frischkorn, Director of Member Services Department: Customer Service				
11.2 – Approving Manager	Name and Title: Samyukta Vendraathi, Chief Operations Officer Department: Customer Service Signature <u>Samyukta Vendraathi</u>				
11.3 – Collaborators	Name(s) and Title(s):				
11.4 – Approvals	<table border="0"> <tr> <td>Policy Review Committee</td> <td>Date Approved: 12/16/2024</td> </tr> <tr> <td>OHA Approval (if needed)</td> <td>Date Approved:</td> </tr> </table>	Policy Review Committee	Date Approved: 12/16/2024	OHA Approval (if needed)	Date Approved:
Policy Review Committee	Date Approved: 12/16/2024				
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11.5 – Original Effective Date	Date: 7/31/2019				
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11.8 – Revision Date(s)	Date: 9/14/2020, 11/10/2020, 3/10/2021, 12/01/2023, 12/13/2024				
11.9 – Add to Advanced Health Website	<input type="checkbox"/>				

How to Request a Health Care Interpreter

Call or Email Advanced Health Customer Service Department:

Phone: 541-269-7400

Toll-free: 1-800-264-0014

TTY users call 711 or 1-800-735-1232

Email: customerservice@advancedhealth.com

Hours of availability: Monday – Friday, 8am – 5pm

- Requests for a Spanish interpreter can be fulfilled by transfer to a Certified/Qualified Spanish Healthcare Interpreter through use of the Language Line On Demand at 866-874-3972 and providing the CCO Client ID# 242069, or through facilitation of the Language Line InSight Video Interpretation Program by a trained Customer Service Representative. These requests are fulfilled at no cost to the Member or provider and do not require a referral or prior authorization, with the exception of availability of services.
- Requests for an additional 240 languages can be accessed through the use of the Language Line On Demand at 866-874-3972 and providing the CCO Client ID# 242069, or through facilitation of the Language Line InSight Video Interpretation Program by a trained Customer Service Representative. These requests are fulfilled at no cost to the Member or provider and do not require a referral or prior authorization, with the exception of availability of services.

A. Routine interpretation requests from providers or Members:

- i. Contact Advanced Health at least 3 days prior to interpreter being needed
- ii. Provide the following information:
 - I. Member ID
 - II. Patient name and contact information
 - III. Preferred language
 - IV. Date and time of appointment
 - V. Address/Location/Room/Provider
 - VI. IV. Approximate length of time interpreter will be needed

B. Urgent interpretation requests: (urgent requests may not be able to be fulfilled)

- i. Contact Advanced Health right away for availability
- ii. Provide the following information:
 - I. Patient name and contact information
 - II. Date and time of appointment
 - III. Address/Location/Room/Provider
 - IV. IV. Approximate length of time interpreter will be needed
 - V. V. Reason for urgency






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