

## POLICY AND PROCEDURE

<b>Policy Manual: Medi-Cal Manual</b>	<b>Origination Date: 2/03</b>	<b>Policy #: IV CL 2</b>
<b>Policy Title: Access to Interpreter Services at Provider Sites</b>	<b>Revision Dates: 2/03</b>	
<b>C &amp; L</b>	<b>Last Reviewed Date: 1/21/04: 3/06</b>	<b>Page 1 of 2</b>

### Policy

To provide medical and non-medical interpretation services at provider sites to facilitate the provision of access to health care and services to Limited English Proficient (LEP) Medi-Cal members.

ProMed will ensure that Limited English Proficient (LEP) Medi-Cal members have equal access to healthcare services through the provision of high quality interpreter and linguistic services as appropriate for medical, pharmaceutical, and non-medical encounters in the member's spoken language. In the case where the member speaks several languages, all efforts will be made to locate an appropriate interpreter in the language of choice.

### Procedure

1. ProMed will provide access to 24-hour telephone interpretation services for LEP Medi-Cal members or rely on Health Plan to provide free interpretation services.
2. ProMed and affiliates will use the 24-hour phone interpreting service as a supplement to live interpretation, and will mobilize qualified staff or contact a qualified interpreting agency, or language appropriate community based organization to meet its interpreting needs; rather than rely solely on telephone interpretation.
3. ProMed will develop and update policies and procedures in regards to language access services and coordinate on-going provider education on language and cultural access issues and differing health outcomes for various populations.
4. ProMed will keep documentation of on-going provider education on 24-hour access to interpreter services (ie; sign-in sheets, provider newsletters, etc.)
5. Provider network includes a sufficient number of providers with bilingual capacity.
6. ProMed must have in place after-hours protocol to avail interpretation services at key points of contact for members and providers.
7. ProMed is responsible for facilitating the process and access to interpretation services for LEP Medi-Cal members.
8. ProMed and affiliates will adhere to the Office of Civil Rights (OCR) recommendations to use translated sign at each provider site to inform members, their family members or representatives the right to free interpreter services for LEP member.

9. ProMed will ensure that interpreters for medical and non-medical sites are proficient in the LEP threshold language.
10. ProMed contracted providers must not require or suggest that LEP members provide their own interpreters or use family members or friends as interpreters. The use of such persons may compromise the reliability of medical information and could result in a breach of confidentiality or reluctance on the part of beneficiaries to reveal personal information critical to their situations. **Minors should not interpret for adults.**
11. If after being notified of the availability of interpreters, the member elects to have a family member or friend serve as an interpreter, (ProMed) and affiliates may accept the request. However, the use of such an interpreter should not compromise the effectiveness of services nor violate the beneficiary's confidentiality.
12. ProMed will ensure providers document the request or refusal of language interpreter services by a LEP member in their medical record.
13. ProMed must ensure that LEP members will not be subjected to unreasonable delays in receiving appropriate interpreter services. If an on-site bilingual staff member or qualified interpreter cannot be accessed, a 24-hour telephone interpretation service will be immediately utilized as a first step to address immediate concerns provided by ProMed or through Health Plan.
14. Each provider office is made aware of and has access to an interpreter card (preferably laminated for selected HMOs), which explains: How to access a translator; How to obtain a card from ProMed or the appropriate HMO. This information will be distributed to physicians upon request.
15. Members may request face to face (for signing or different language) or telephone interpreter services to discuss complex medical information and treatment options
16. Providers offices are informed of availability and how to access the California relay Services for the deaf.
17. Provider offices will be aware that member has a right to file a complaint or grievance if linguistic needs are not met.
18. Provider Relations will ensure evidence of coordination on linguistic services. This will be accomplished via an in-service log that shows education of:
  - Physicians and/or office staff
  - ProMed staffAreas for in-service must include:
  - HMO Customer Care Center contact and procedures for interpreting services
  - Accessing TDD services
  - Interpreter services card information
  - Refusal of services
  - Grievance or complaint procedure