

# PROVIDER Update



Health Net®

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## Language Assistance Program and Cultural Competency

The Health Care Language Assistance Regulations require all California managed care health plans to provide language assistance and culturally responsive services to members with limited English proficiency (LEP), limited reading skills, are deaf or have hearing impairments, or have diverse cultural and ethnic backgrounds. To comply with this requirement, Health Net Community Solutions, Inc. (Health Net) created the Language Assistance Program (LAP). Health Net's LAP offers interpreter services to ensure that Health Net LEP members can obtain language assistance while accessing health care services. Health Net's LAP is available to participating physician groups (PPGs), physicians and ancillary providers, including nurses and physician assistants, to support Health Net members' linguistic and cultural needs.

Health Net does not delegate its LAP obligations to PPGs, physicians or ancillary providers, all of which must comply with Health Net's LAP.

### LANGUAGE ASSISTANCE PROGRAM OVERVIEW

Health Net's LAP includes the following:

- Interpreter services for Health Net LEP members at all medical points of contact, available 24 hours a day, seven days a week at no cost. All interpreters meet the interpreter quality standards established by the U.S. Department of Health and Human Services 45 CFR 92 and CA Senate Bill 223.
- Translation of vital documents or member-informing materials produced by a PPG on behalf of Health Net in the threshold languages.
- Taglines to inform members that they can receive an interpreter in their preferred language and nondiscrimination notices must be included in all member mailings.
- Standards to monitor the quality and effectiveness of the LAP.

Members have the right to file a grievance with Health Net and the ability to file a discrimination complaint with the Office of Civil Rights if their language needs are not met.

### LAP COMPLIANCE REQUIREMENTS

All Health Net participating providers are required to follow Health Net's LAP by using:

- Interpreter services – Use qualified interpreters for LEP members. Health Net provides interpreter services at no cost. Telephone interpreters are available in more than 150 languages. Advance notice is not required for telephone interpreters.
- Translation services – Translations and alternate formats of utilization and case management materials must be made available to members that have a preferred language or format listed on the Health Net eligibility file. All LEP members may request a translation or alternate format of utilization management (UM) or case management (CM) letters. If a Health Net member requests translation or an alternative format of an English document that was produced by a delegated PPG, the provider must refer the member to the Health Net Member Services telephone

#### THIS UPDATE APPLIES TO CALIFORNIA PROVIDERS:

- Physicians
- Participating Physician Groups
- Hospitals
- Ancillary Providers

#### LINES OF BUSINESS:

- HMO/POS/HSP
- PPO
- EPO
- Medicare Advantage (HMO)
- Medi-Cal
  - Kern
  - Los Angeles
    - Molina
  - Riverside
  - Sacramento
  - San Bernardino
  - San Diego
  - San Joaquin
  - Stanislaus
  - Tulare

#### PROVIDER SERVICES

1-800-675-6110

provider.healthnet.com

#### PROVIDER COMMUNICATIONS

provider.communications@

healthnet.com

fax 1-800-937-6086

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number on the member's identification (ID) card. When Member Services receives the request, Health Net will request the document from the PPG. The PPG must submit the document within 48 hours.

- Tagline and nondiscrimination notice – Include a Health Net-specific tagline and nondiscrimination notice with member information sent to Health Net members. The Health Net-specific tagline and nondiscrimination notice are available on the Health Net provider website at [provider.healthnet.com](http://provider.healthnet.com) under *Working with Health Net > Provider Library > Forms > Nondiscrimination Notice and Taglines*.
- Member complaint/grievance forms – Provide translated member grievance forms to members upon request. Forms are available on the Health Net provider website at [provider.healthnet.com](http://provider.healthnet.com) under *Working with Health Net > Provider Library > Forms > Member Grievance Form*.
- Independent Medical Review (IMR) Application – Locate translated IMR applications on the Department of Managed Health Care (DMHC) website at [www.dmhc.ca.gov](http://www.dmhc.ca.gov) and make them available to members upon request.
- Medical record documentation – Document the member's language preference (including English) and the refusal or use of interpreter services in the member's medical record.

## INTERPRETER SERVICES

To obtain interpreter services, contact Health Net Member Services at the telephone number on the member's ID card or the toll-free numbers listed on the Health Net provider website at [provider.healthnet.com](http://provider.healthnet.com).

Non-English interpreter services include:

- Qualified interpreters trained on health care terminology and a wide range of interpreting protocols and ethics.
- Telephone interpreters available in more than 150 languages on short notice.
- Support to address common communication challenges across cultures.
- Oral translations of member materials in more than 150 languages.
- Sign language interpreter services are available. Please request a sign language interpreter as soon as the appointment is made, but not less than five business days before the appointment.

A non-English language identification poster is available to print and post in providers' offices on the provider website at [provider.healthnet.com](http://provider.healthnet.com) under *Working with Health Net > Provider Library > Forms > Language Identification Poster*. Contact Health Net's Cultural and Linguistic (C&L) Services Department for a hard copy. Providers are not required to post this information; however, using this tool makes it easier to identify the specific language needs of the patient.

Providers are asked to make accommodations to use telephone interpreters as that may be the only service that is available for the appointment time or language. Allow adequate time before the appointment to get the telephone interpreter on the line.

### Business Hours and After-Hours Interpreter Services for Health Net Members

Medi-Cal providers can contact the Health Net Medi-Cal Provider Services Department at 1-800-675-6110. Interpreter services are available 24 hours a day, seven days a week.

Interpreter services contact information is also available on the Health Net provider website at [provider.healthnet.com](http://provider.healthnet.com) under *Working with Health Net > Provider Library > Contacts > Access to Interpreter Services*.

## PROVIDER RESPONSIBILITIES

Participating providers may use Health Net's interpreter services to provide interpreters to members who require or request them. Participating providers must ensure that language services meet the established requirements as follows:

- Ensure that interpreters are available at no cost to members at the time of the appointment.
- Ensure that LEP members are not subject to unreasonable delays in the delivery of services, including accessing providers after hours.
- Extend the same program and activity participation opportunities to all members regardless of language preference.
- Provide services to LEP members that are as effective as those provided to non-LEP members.
- Record the member's language needs, request or refusal of interpreter services, in the member's medical record.
- Provide translated member grievance forms to members upon request.
- Provide translations or alternate formats to Health Net members in a timely manner.

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Providers are prohibited from:

- Requesting or requiring an individual with LEP to provide his or her own interpreter.
- Relying on staff other than qualified bilingual/multilingual staff to communicate directly with LEP individuals.
- Relying on a minor or accompanying adult to interpret or facilitate communication except:
  - In an emergency where there is no qualified interpreter for the LEP individual immediately available. The emergency must be noted in the member's medical record. A parent cannot give permission for a minor child to interpret in any other circumstance.
  - When the LEP individual specifically requests that the accompanying adult interpret, that adult agrees to provide such assistance, and reliance on that adult is appropriate. Providers are encouraged to document in the member's medical record the circumstances that resulted in the use of an accompanying adult as an interpreter.

## PROVIDER RACE AND ETHNICITY

Providers should consider providing Health Net with physician race or ethnicity information. The information is voluntary. Health Net uses the information in health disparity reduction efforts. Providers can provide this information on the Quarterly Active Physician Listing Report available on Health Net's provider portal at [provider.healthnet.com](http://provider.healthnet.com) under *Provider Reports > Available Reports > Administrative > Active Physicians Listing*.

## THRESHOLD LANGUAGES AND LANGUAGE ASSISTANCE

Health Net has established the languages that are used to provide print translations and alternate formats. The threshold languages for Health Net members are determined through analysis of member and Census data. PPGs are required to send all Medi-Cal member information in the member's eligibility file listed threshold language or alternate format. The threshold languages by county are:

- Kern, San Joaquin, Stanislaus, and Tulare: Spanish
- Los Angeles: Arabic, Armenian, Cambodian, Chinese, Farsi, Korean, Russian, Spanish, Tagalog, and Vietnamese
- Sacramento: Arabic, Chinese, Hmong, Russian, Spanish, and Vietnamese
- San Diego: Arabic, Spanish, Tagalog, and Vietnamese

PPGs have access to members' preferred spoken and written languages via the Health Net Eligibility Report. Individual and ancillary providers can obtain members' language preferences by contacting the Health Net Provider Services Center. UM or CM delegated provider groups may send any member information that requires translation into the member's threshold language to Health Net for translation. Materials sent for translation must be in a Word or unlocked PDF format. Scanned or faxed documents will not be accepted. Care plans must be sent with proof that the document is at 6th grade reading level or below. The PPG must send the member's name, member ID, the document requested, and the member's address to Health Net. Send translation requests to [provider\\_services@healthnet.com](mailto:provider_services@healthnet.com). Providers must also use the same process to request an alternate format of any UM or CM materials in English or a threshold language.

## CULTURAL COMPETENCY TRAINING

All Health Net participating providers are required to take cultural competency training. Completion of cultural competency training is reflected in Health Net's provider directory. Cultural competency training may be met through various programs; however, Health Net recommends the Office of Minority Health (OMH) modules. OMH offers a computer-based training (CBT) program, *A Physician's Practical Guide to Culturally Competent Care*, on cultural competency for health care providers. The training was developed to furnish providers with competencies that enable them to better treat an increasingly diverse population. This no-cost educational program is available to providers through the OMH Think Cultural Health website at <https://cccm.thinkculturalhealth.hhs.gov>. Health Net does not sponsor or maintain the OMH CBT or website.

Cultural competency resources are available for use in providers' offices through the provider operations manuals on the provider website at [provider.healthnet.com](http://provider.healthnet.com) under *Working with Health Net > Provider Library > Operations Manuals > Quality Improvement > Quality Improvement Program > Cultural and Linguistic Services > Industry Collaboration Effort (ICE): Provider Tools to Care for Diverse Populations*. Health Net's C&L Services Department can create customized cultural competency training upon request.

For more information about interpreter services, cross-cultural communication, and health literacy, or to schedule training, contact the C&L Services Department via email at [cultural.and.linguistic.services@healthnet.com](mailto:cultural.and.linguistic.services@healthnet.com) or by telephone at 1-800-977-6750. If you have questions regarding the information contained in this update, contact the Health Net Medi-Cal Provider Services Center within 60 days at 1-800-675-6110.