



Policy & Procedure

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| Company: | ODS Community Dental | Reference Number: | QI-632 |
| Department: | Dental Services | | |
| Business unit: | Dental Medicaid | Category: | Quality Improvement |
| Title: | Communication Accessibility | | |
| Origination Date: | 7/2019 | Original Effective Date: | 7/1/2019 |
| Revision Effective Date: | 046014/2024 | Published Date: | 06/14/2024 |
| Revision Published Date: | 12/13/2019, 10/9/2020; 04/07/2022, 06/14/2024 | Next Annual Review Date: | 06/2025 |
| State (select all boxes applicable to this policy) <input type="checkbox"/> Alaska <input checked="" type="checkbox"/> Oregon <input type="checkbox"/> Washington | | | |
| Product (check all boxes applicable to this policy) <input checked="" type="checkbox"/> Dental <input type="checkbox"/> Medical <input type="checkbox"/> Pharmacy <input type="checkbox"/> Vision <input type="checkbox"/> Other _____ | | | |
| Type of Business (check all boxes applicable to this policy) <input type="checkbox"/> Commercial Group <input type="checkbox"/> Commercial Individual <input type="checkbox"/> Exchange Business <input type="checkbox"/> EOCCO <input checked="" type="checkbox"/> OHP <input type="checkbox"/> Medicare <input type="checkbox"/> ASO/ Self-funded <input type="checkbox"/> Other _____ | | | |

I. Policy Statement and Purpose

ODS Community Dental ensures access to communication options appropriate to the unique needs of its members who have difficulty communicating due to a medical condition, limited English proficiency (LEP), or some other disability. Oregon Health Plan (OHP) members with hearing impairment or with limited English proficiency are provided on-site interpreters for covered dental care visits. ODS Community Dental ensures appropriate access to dental care or the dental plan for vision, hearing and/or speech-impaired members and provides interpretation services over the phone when necessary.

II. Definitions

A. Plain Language is clear, straightforward expression, using only as many words as are necessary. It is language that avoids obscurity, inflated vocabulary and convoluted sentence construction.

III. Procedures

A. Access to ODS OHP dental plan for vision, hearing, and/or speech-impaired members

1. Handbooks are made available in an audio format for vision-impaired members upon request.
2. The OHP member handbook and other communications to our OHP members instruct TTY/TDD users to use relay 711 to contact our customer service department.
3. Hearing and speech-impaired members can also access ODS Community Dental through e-mail messages. These communications are recorded in the ODS Community Dental member contact electronic files.

4. For individuals with a disability, interpreters such as sign language interpreters, oral transliterators, and cued language transliterators are considered qualified and can be provided for all covered dental services.

B. Interpreter services for non-English speaking members and potential members

1. Oregon certified or Oregon qualified interpreters are available to communicate in the primary language of non-English speaking members and potential members and hearing impaired by phone or in person if requested anywhere the member or potential member is attempting to access care or communicate with ODS. Such interpreters are linguistically and culturally appropriate as described in the National CLAS Standards and demonstrate both awareness for and sensitivity to cultural differences and similarities and the effect on the member's care. Interpreters can communicate in English and the primary language of the member and are able to translate clinical information effectively. Interpreters are available at no cost to members and potential members. The interpreter service bills are reimbursed by ODS Community Dental.
2. Certified or qualified interpreter services can be provided for all covered oral health services to interpret for members in the primary language of non-English-speaking members.
3. If an Oregon certified or qualified is not available, the interpreters provided will adhere to generally accepted interpreter ethics principles, including client confidentiality, demonstrate proficiency in speaking and understanding both spoken English and at least one other language and can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary, terminology, and phraseology.
4. In order for bilingual staff members to provide interpreter services, they must be OHA certified or qualified. In order for bilingual dentists to provide services in a member's preferred language, they must pass a proficiency test. ODS offers financial assistance for certification training and proficiency testing. For additional information, contact ODS at odslangaccess@odscommunitydental.com.
5. Interpretation should not be provided by a member of the patient's family or by friends.

C. Telephone interpreter services for non-English speaking members

1. Customer service representatives are trained to coordinate telephone interpreters for communication with OHP members and potential members.
2. When a non-English speaking member telephones and requests language assistance, the customer service representative identifies the language, places the member on hold, and calls for an appropriate interpreter. When the interpreter is on the line, a conference call is established and information is relayed through the interpreter.
3. When a non-English speaking member or potential member comes to an ODS Community Dental administrative office, a customer service representative coordinates a conference call with an appropriate interpreter.
4. When a dental office requests a telephone interpreter to communicate with an ODS Community Dental member, the dental customer service representative requests an interpreter with Passport to Languages.

D. Person-to-person interpreter services for non-English speaking members

1. **The OHP contract requires the availability of on-site, person-to-person interpreter services for provider office visits. ODS Community Dental contracts with an interpreter services vendor for this. All interpreters are linguistically appropriate and are able to communicate in both English and the member's primary language to enable the provider to understand the member's complaint, make a diagnosis, respond to member questions and concerns, and communicate instructions to the member.**
2. **When a provider's office calls ODS Community Dental, a customer service representative completes an on-site interpreter request form. A three-day notice is requested, however less notice may be accommodated for emergencies. The interpreter service requests 24-hour notice for cancellation or rescheduling.**
3. **The completed on-site interpreter request form is forwarded to the OHP Coordinator, who then**

schedules an interpreter with the contracted interpreter service.

IV. Provider and Member Access to Interpreter services

1. In advance of services, providers determine ODS OHP eligibility by contacting ODS Community Dental customer service at 503-243-2987 or 1-800-342-0526. This information is located in the dental provider's ODS OHP manual.
2. Providers are informed of the process for arranging interpreter services in their provider manual.
3. The dental OHP Member Handbook and ODS website and provider directories inform the member that their provider will coordinate interpretation services.

V. Member communications

1. All member mailings:
 - a. Materials will be translated in the prevalent non-English languages as defined in OAR 410-141-3575 in the service area and include a tagline sheet explaining the availability of written translation or oral interpretation to understand the information provided, as well as alternate formats and the toll-free and TTY/TDY customer service telephone number. These taglines are written in the prevalent non-English languages, as well as English-language large print (18-point font).
 - b. Include a non-discrimination notice**
2. All written member communications are:
 - a. Written at a sixth-grade reading level or lower and reviewed using a readability test tool, such as Flesch-Kincaid.
 - b. Published using a 12-point, sans-serif font (Calibri). This includes "fine print" text.**
 - c. Reviewed to ensure that they follow plain language best practices. This is done using our checklist for writing member communications, which addresses health literacy, plain language, and culturally appropriate communications development.
3. Written materials in other languages or alternate formats
 - i) Written communications are translated and made available to members, family members, and/or caregivers in all non-English prevalent languages as defined in PAR 410-141-3575 in the service area and in any language upon request at no cost.
 - ii) Materials will be made available in alternative formats upon request of the member at no cost. Auxiliary aids and services will also be made available upon request of the member at no cost.
 - iii) ODS Community Dental contracts with a translation service provider to translate written materials.
 - a. Electronic member materials Electronic versions of member materials will be made available on the ODS website, including provider directories and handbooks in a form that can be electronically retained and printed, available in a machine-readable file and format, and Readily Accessible, e.g., a PDF document posted on the plan website that meets all language requirements. For any required member education materials on the ODS website, the member is informed that the information is available in paper form without charge upon request to Members and Member representatives, and ODS will provide it upon request within five business days.**

VI. Monitoring

The Dental Quality Improvement Committee reviews member complaints quarterly for persistent or significant problems regarding interpreter services for non-English speaking members and access for vision, hearing or speech-impaired members. The committee identifies areas for improvement and implements appropriate interventions.

The OHP Dental Services team also regularly monitors interpreter utilization to help inform culturally appropriate and equitable service delivery to our diverse membership. Quarterly reporting is submitted to the

OHA and other CCO's along with an interpreter services self-assessment annually to comply with contractual agreements.

VII. Related Policies & Procedures, Forms and References

Policies & Procedures

OHP Dental Access Policies and Procedures

Forms and References

Checklist for writing member communications

OAR: 410-141-3515

OAR 410-141-3585

VIII. Revision Activity

| New P & P /Change / Revision and Rationale | Final Review/Approval | Approval date | Effective Date of Policy/Change |
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| Added reference to OAR Added "and/or potential members" wording to section B in response to OHA audit. Add information about interpreters being available at no cost in response to audit. | DQIC | 10/9/20 | 10/1/20 |
| New policy created as a result of a dental access policy consolidation. Combines the following policies, with minimal revisions: OHP Dental Access – Interpreter Services for Non English Speaking Members and OHP Dental Access – Vision, Hearing, and/or Speech Impaired Members. These policies have been archived. | DQIC | 8/9/19 | 7/1/19 |
| Policy revised with updated standards for developing member communications (added Section E on Member Communications) | DQIC | 12/13/2019 | 12/1/19 |
| Policy revised based on audit with OHA (include language that interpreters are available to potential members and at no cost); Updated OAR | DQIC | 10/9/2020 | 10/1/2020 |
| Updated language and specifics of interpretation services available to comply with updated standards in O.A.R. Added distinctions between certified and qualified interpreters and non-certified and non-qualified interpreters. Updated member communications section to include availability of materials in non-English prevalent | DQIC | 04/07/2022 | 04/07/2022 |

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| languages and added subsection addressing electronic versions of materials. Reorganized policy sections to group similar information together | | | |
| Added language outlining requirements for bilingual staff to interpret and providers to provide care in a second language. The use of family members was also addressed. | DQIC | 6/14/2024 | 6/14/2024 |

IX. Affected Departments:

**ODS Customer Service, Commercial and OHP Dental
Professional Relations, Dental**