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Oregon Health Authority

CCO Annual Language Self-Assessment: Meaningful Language Access to Culturally Responsive Health Care Services

Introduction

As required by OAR 410-141-3515(12)(g)(A), each Coordinated Care Organization (CCO) must conduct an annual self-assessment of their workflows in place to provide quality language access services and language services available in its organization to meet member needs. The self-assessment guides your CCO to progressively higher quality and a more robust infrastructure of language services over time. The CCO's responses to the self-assessment must be submitted to OHA through an online survey. Your responses will be analyzed to determine whether your CCO has met the following requirements:

- The intent of OAR 410-141-3515 12(g)(A)
- The Health Equity Measure requirements for **2022** CCO incentives which entail:
  - Answering all survey questions;
  - Passing the required questions for the **2022** measurement year; and
  - Meeting the minimum points required for the 2022 measurement year**(56 points).**

Completion of the online survey does not guarantee that your CCO has met the metric or intent of the administrative rules. OHA will evaluate your responses to determine whether the structures and workflows you attested to meet the required standards for providing consistent quality language access services to your members.

Questions are organized in four domains with point values for questions in each domain. In general, each statement is worth one point and some questions have multiple statements so worth more than one point. **Responses should be based on language services in place on the final day of the assessment year (December 31, 2022).**

The CCO Contracts Administrator will send the link for the online survey by December 15, 2022. **All online survey responses are due on January 16, 2023.** (Consistent with ORS 187.010(3), survey responses received on January 17, 2023, are considered timely.) Only online responses will be accepted; this PDF version of the survey is provided for reference only.

The self-assessment is designed to guide your CCO to progressively higher quality and a more robust infrastructure for providing language services to members.

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Additional Information

OHA reserves the right to request additional or clarifying information to support responses provided through the online survey, including but not limited to further detail on language access plans, data collected, examples of policies, or translated materials.

For questions about this survey or the CCO incentive metric, please contact metrics.questions@odhsoha.oregon.gov.

Contact Information

The contact person is the one completing the survey and the first point of contact if OHA has any follow-up or clarifying questions about survey responses. If multiple individuals for the same CCO submit survey responses, OHA will follow-up with the CCO as to which of the respondents should be the primary contact.

Name: _____

CCO Name: _____

Email Address: _____

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Domain 1: Identification and assessment for communication needs

Questions in this domain assess **how well your CCO identifies and tracks services** to limited English proficient (LEP), and Deaf and hard of hearing populations you serve.

CCOs should answer questions based on language services in place on December 31, 2022. Your responses will help OHA to evaluate your current workflows and how well your CCO is performing these critical and meaningful language access functions.

1) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)**

CCOs must answer "yes" to at least five of the seven statements to meet the must pass criteria for this question. Minimum points required = 5; Total points possible = 7.

Please answer **yes or no** for each of the following statements on how your CCO identifies members needing communication access (e.g. LEP, sign language users).

	Yes	No
The CCO has a **process to respond to individual requests** for language assistance services (including sign language).	( )	( )
The CCO has a **process for self-identification** by the Deaf or hard of hearing person, non-English speaker or LEP individual.	( )	( )
The CCO has a **process for using open-ended questions** to determine language proficiency on the telephone or in person.	( )	( )
The CCO customer service staff are **trained to use video relay or TTY** for patient services.	( )	( )
The CCO **uses "I Speak" language identification cards** or posters.	( )	( )
The CCO has a **process for responding to member complaints** about language access and clearly communicates this process to all members.	( )	( )
The CCO **uses MMIS/ enrollment data** from OHA about primary language.	( )	( )

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2) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)**
CCOs must answer "yes" to all statements to meet the must pass criteria for this question.
Minimum points required = 3; Total points possible = 3.

Please answer **yes or no** for each of the following statements about collecting data.

	Yes	No
The CCO collects data on the **number of members served who are Limited English Proficient (LEP)**.	( )	( )
The CCO collects data on the **number of members served who are Deaf and hard of hearing**.	( )	( )
The CCO collects data on the **number and prevalence of languages spoken by members** in your service area.	( )	( )

3) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)**
CCOs must answer "yes" to all statements to meet the must pass criteria for this question.
Minimum points required = 2; Total points possible = 3.

Please answer **yes or no** for each of the following data sources that your CCO uses to determine the needs and/or population size of the LEP and Deaf and hard of hearing members in your service area.

	Yes	No
OHA MMIS	( )	( )
CCO specific enrollment information on members interpreter needs.	( )	( )
Local community organizations and/or on-line data (example LEP.gov; census data or the American Community Survey (ACS) data).	( )	( )

4) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)**
CCOs must answer "yes" to meet the must pass criteria for this question (no points available)

How often does your CCO use any of the above-listed data sources to assess LEP and Deaf and hard of hearing member needs?
( ) Monthly

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( ) Quarterly
( ) Annually

5) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)**
CCOs must answer "yes" to meet the must pass criteria for this question (total points = 1).

Does your CCO record the primary language from LEP or Deaf and hard-of- hearing members when they first contact your CCO (for example, at intake or first encounter)?
( ) Yes
( ) No

6) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)** *CCOs must answer "yes" to meet the must pass criteria for this question (total points = 1).*

Does your CCO have a process for sharing information about members who need spoken and sign language interpretation needs with your provider network?
( ) Yes
( ) No

7) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)** *CCOs must answer this question to meet the must pass criteria (total points = 1)*

If yes to the previous question, please briefly describe how your CCO shares primary spoken language or hearing assistance needs with provider networks or service coordinators.
_____

8) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)** *CCOs must answer this question to meet the must pass criteria (total points = 1)*

If yes to question 6, how frequently do you share this information?
Weekly( )
Monthly( )
Quarterly( )
Annually( )

9) **Must pass beginning in measurement year 2021 (year 1 of the incentive metric)**
CCOs must answer "yes" to meet the must pass criteria for this question (total points = 1)
Does your CCO have the capability to identify the number of members needing spoken and sign language interpretation services that were not identified in form 834 from OHA?
( ) Yes
( ) No

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10) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric).**
CCOs must fill in the required languages to meet the must pass criteria for this question (total points = 1).

Please list the top SIX most frequently encountered spoken and sign languages by your CCO for the measurement year.

Write in language

11) **Must pass beginning in the measurement year 2022 (year 2 of the incentive metric)**
CCOs must answer "yes" to at least three of the four statements to meet the must pass criteria for this question. Minimum points required = 3; Total points possible = 5.

Please answer **yes or no** for each of the following statements about members that refused, did not need, or needed interpretation services but were not identified as such.

	Yes	No
The CCO collects data on the number of members served **who self-identified as LEP but refused interpretation services**.	( )	( )
The CCO collects data on the number of members served **who are Deaf and hard of hearing but refused interpretation services**.	( )	( )
The CCO collects data on the number of members served who **did not have MMIS language flag but requested interpreter services**.	( )	( )

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The CCO collects data on the number of members served who **had an MMIS language flag but did not need interpreter services.**	( )	( )
The CCO collects data on the members served who **requested and received in- language services from bilingual providers** and therefore trained interpreters were not needed for the visits	( )	( )

12) **Must pass beginning in the measurement year 2023 (year 3 of the incentive metric).**
CCOs must answer "yes" to all statements to meet the must pass criteria for this question.
Minimum points required = 2; Total points possible = 2.

Please answer **yes or no** for each of the following statements about appointment wait times.

	Yes	No
The CCO collects data on the wait times for **LEP members** that need appointments with interpreter services.	( )	( )
The CCO collects data on the wait times for **Deaf and hard of hearing members** that need appointments with interpreter services.	( )	( )

13) **Must pass beginning in the measurement year 2023 (year 3 of the incentive metric)**
The best practice is a wait time of fewer than seven days, however any answer is acceptable to meet the must pass criteria. Minimum points required = 2; Total points possible = 2.

Please mark the average wait time for each of the following appointments, (from the day the member requested the visit to the day of the visit (not the time to arrange interpreter service). (choose only one answer per statement).

	Same day	1-3 days	4-7 days	More than 7 days
The average wait time for Limited English Proficient members needing interpretation services is:	( )	( )	( )	( )
The average wait time for Deaf and hard of hearing members needing interpretation services is:	( )	( )	( )	( )

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14) CCOs are required to answer this question. (Must answer, no point available).
What is the average wait time(from the day the member requested the visit to the day of the visit) for members that do not need interpretation services?
( ) Same day
( ) 1-3 days
( ) 4-7 days
( ) More than 7 days
( ) The CCO does not collect this information

15) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)** *CCOs must answer this question to meet the must pass criteria (Must answer, no points available)*

How frequently do you track the average number of encounters by spoken and sign languages and share the data with provider networks or service coordinators?

( ) Weekly
( ) Monthly
( ) Quarterly
( ) Annually

16) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)** *CCOs must answer this question to meet the must pass criteria (Must answer no points available)*

Does your CCO have a process for identifying the total number of Deaf and hard of hearing members that prefer sign language or assistive communication devices to ensure effective communication in your CCO and provider network?

( ) Yes
( ) No

17) CCOs are required to answer this question. Must answer no points available.
 Does your CCO use local community organizations and/or on-line data (e.g. LEP.gov, census data) to determine needs and/or population size of the LEP and Deaf and hard of hearing members in your service area?
( ) Yes
( ) No

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Domain 2: Provision of Language Assistance Services

CCOs should answer questions based on language services in place on December 31, 2022.

Questions in this domain assess **how well you use data and work processes to effectively communicate** with the Limited English Proficient (LEP), and Deaf and hard of hearing populations you serve. Your responses will help OHA to evaluate how well your CCO is performing these critical meaningful language access functions.

18) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)** *CCOs must answer "yes" to at least three of the four statements to meet the must pass criteria for this question. Minimum points required = 3; Total points possible = 4.*

Please answer **yes or no** to each of the following statements about tracking language assistance services at the CCO and provider network levels.

	Yes	No
The CCO tracks **the primary language** of persons encountered or served.	( )	( )
The CCO tracks **the use of language assistance services** such as interpreters and translators.	( )	( )
The CCO tracks **staff time (including bilingual providers) spent providing bilingual spoken and sign language** assistance services.	( )	( )
The CCO tracks **the use of spoken and sign language assistance services by modality** (in-person; telephonic, video remote, other modalities).	( )	( )

19) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)** *CCOs must answer "yes" to at least three of the four statements to meet the must pass criteria for this question. Minimum points required = 5; Total points possible = 7.*

Please select **yes or no** to the types of language assistance services that are provided by your CCO and provider network.

	Yes	No
Bilingual clinic staff and providers	( )	( )

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In-house interpreters (spoken and sign)	( )	( )
In-house translators (for documents)	( )	( )
Contracted in-person interpreter services	( )	( )
Contracted translators (for documents)	( )	( )
Contracted telephonic interpreter services	( )	( )
Contracted video interpreter services	( )	( )

20) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)** *CCOs must answer "yes" to all statements to meet the must pass criteria for this question. Minimum points required = 5; Total points possible = 8.*

Please select **yes or no** to the following care delivery settings in which your CCO provides spoken and sign language interpretation service for member visits.

	Yes	No
Medical (in-patient)	( )	( )
Medical (office/out-patient)	( )	( )
Emergency Department	( )	( )
Dental	( )	( )
Telehealth	( )	( )
Home health	( )	( )
Pharmacy connected to a provider network	( )	( )
Lab services connected to a provider network	( )	( )

21) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)** *CCOs must answer "yes" to meet the must pass criteria for this question (total points = 1)*

Does your CCO and provider network have policies on the use of family members or friends to provide interpretation services?
( ) Yes
( ) No

22) Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)
CCOs must answer this question to meet the must pass criteria for this question (total points = 1)

If yes to the previous question, please briefly describe your policies on when or how family members or friends can provide interpretation services.
_____

23) Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)
CCOs must answer "yes" to meet the must pass criteria for this question (total points = 1)

Does your CCO provide staff who coordinate interpreter services with information on how to access OHA approved spoken and sign language interpreters?
( ) Yes
( ) No

24) Must pass beginning in the measurement year 2021 (year 1 of the incentive metric) *CCOs must answer "yes" to all statements to meet the must pass criteria for this question. Minimum points required = 6; Total points possible = 6*

Please select yes or no to each of the following statements about the translation of vital written documents into non-English languages.

	Yes	No
Consent forms are translated into non-English languages.	( )	( )
Complaint forms are translated into non-English languages.	( )	( )
Intake forms are translated into non-English languages.	( )	( )
Notices of rights are translated into non-English languages.	( )	( )
Notice of denial, loss or decrease in benefits or services are translated into non-English languages.	( )	( )

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Information on programs or activities to receive additional benefits or services are translated into non-English languages.	( )	( )

25) Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)
CCOs must answer "yes" to meet the must pass criteria for this question (total points = 1)

Are the translated documents available in alternate formats that include large prints or braille?
( ) Yes
( ) No

26) Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)
CCOs must answer "yes" to meet the must pass criteria for this question Must answer not points available
When your CCO updates information on its website, does it also include non-English language translation of the content?
( ) Yes
( ) No

27) Must pass beginning in the measurement year 2022 (year 2 of the incentive metric)
CCOs must answer "yes" to at least four of the six statements to meet the must pass criteria for this question. Minimum points required = 3; Total points possible = 6.

Does your CCO track the following data regarding language assistance services provided by the CCO and provider network? Please mark yes or no for each of the following statements.

	Yes	No
The CCO **validates all invoices** from interpreting agencies to ensure they include member level details.	( )	( )
The CCO **compares all invoice information from Language Service Providers with an internal data system** (for example MMIS flag) to confirm member level details.	( )	( )
The CCO **tracks invoices from Language Service Providers for all service modalities** (in-person, telephonic, video remote).	( )	( )

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The CCO has a system for **tracking the unit cost of each language assistance service provided.**	( )	( )
The CCO tracks **the cost of services provided by bilingual staff interpreters.**	( )	( )
The CCO tracks the **cost of translation of materials into non-English languages.**	( )	( )

28) **Must pass beginning in the measurement year 2023 (year 3 of the incentive metric)**
CCOs must answer "yes" to at least three of the four statements to meet the must pass criteria for this question. Minimum points required = 3; Total points possible = 4.

Please answer **yes or no** to each of the following statements about tracking language assistance services at the CCO and provider network levels.

	Yes	No
The CCO tracks training and **OHA credentialing of contracted interpreters**.	( )	( )
The CCO tracks training and **OHA credentialing of staff members who interpret for patients** (such as full-time CCO staff interpreters or dual-role interpreters).	( )	( )
The CCO tracks the **total cost of interpreter services**.	( )	( )
The CCO tracks the **cost of translation of materials** into non-English languages.	( )	( )

29) **Must pass beginning in the measurement year 2023 (year 3 of the incentive metric)**
CCOs must answer "yes" to at least five of the seven statements to meet the must pass criteria for this question. Minimum points required = 5; Total points possible = 7

Please select yes or no to the language assistance services that your CCO can provide **detailed member level information**, such as member ID, date of service, and interpreters' credential

	Yes	No
Bilingual clinic staff and providers	( )	( )

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CCO in-house interpreters (spoken and sign)	( )	( )
CCO in-house translators (for documents)	( )	( )
Contracted in-person interpreters	( )	( )
Contracted translators	( )	( )
Contracted telephonic interpretation services	( )	( )
Contracted video interpretation services	( )	( )

30) **Must pass beginning in the measurement year 2023 (year 3 of the incentive metric)**
CCOs must answer "yes" to at least five of the seven statements to meet the must pass criteria for this question. Minimum points required = 5; Total points possible = 8

When spoken and sign language interpretation services are provided during member visits, can your CCO **collect detailed member level information** (such as member ID, date of service, and interpreter's credential) for appointments in each of the following care delivery settings? Please select yes or no to the following statements.

	Yes	No
Medical (inpatient)	( )	( )
Medical (outpatient/office)	( )	( )
Emergency Department	( )	( )
Dental	( )	( )
Telehealth	( )	( )
Home Health	( )	( )
Pharmacy connected to a provider network	( )	( )
Lab services connected to a provider network	( )	( )

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31**) Must pass beginning in the measurement year 2023 (year 3 of the incentive metric)**
CCOs must answer "yes" to at least five of the seven statements to meet the must pass criteria for this question. Minimum points required = 2; Total points possible =2.

Please answer **yes or no** to the following statements related to standardized proficiency assessments for bilingual staff and interpreters.

	Yes	No
For Limited English Proficient (LEP) members, the CCO requires a standardized proficiency assessment for bilingual staff interpreters and bilingual providers before allowing them to interpret or translate documents.	( )	( )
For Deaf and hard of hearing members, the CCO requires a standardized proficiency assessment for bilingual staff interpreters and or bilingual providers before allowing them to interpret.	( )	( )

32) **Must pass beginning in the measurement year 2023 (year 3 of the incentive metric)** *Total points = 1 (year 1 required).*

If yes to statements in the previous question, please briefly describe your proficiency assessment. (For example, online training, in person training, scored skill test).
_____

Domain 3: Training of staff on policies and procedures

CCOs should answer questions based on language services in place on December 31, 2022.

Questions in this domain assess **how well your CCO staff who provide services to Limited English Proficient (LEP), and Deaf and hard of hearing populations is trained on language access policies and procedures. Your responses will help OHA to evaluate how well your CCO is performing these critical meaningful language access functions.**

33) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)**
CCOs must answer "yes" to at least five of the seven statements to meet the must pass criteria for this question (total points = 1).

Does your CCO staff procedures handbook include specific instructions on how to provide language assistance services to LEP and Deaf and hard of hearing members?
( ) Yes
( ) No

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34) **Must pass beginning in the measurement year 2022 (year 2 of the incentive metric)**
CCOs must answer "yes" to at least four of the six statements to meet the must pass criteria for this question. Minimum points required = 3; Total points possible = 6.

Please select **yes or no** to each of the following CCO staff groups that receive training at regular intervals on working with Limited English Proficient (LEP) and Deaf and hard of hearing members.

	Yes	No
Management or senior staff	( )	( )
Employees who interact with or are responsible for interactions with non-English speakers or LEP members	( )	( )
Bilingual staff and providers	( )	( )
New employees	( )	( )
All employees	( )	( )
Volunteers	( )	( )

35) **Must pass beginning in the measurement year 2023 (year 3 of the incentive metric)**
CCOs must answer "yes" to meet the must pass criteria for this question (total points = 1)

Are <u>all</u> CCO staff members who interpret for patients (such as full-time staff interpreters or dual-role interpreters) trained and certified or qualified by OHA?
( ) Yes
( ) No

CCOs are required to answer this question. Must answer, no point available.
36) Do CCO staff who provide care or services to Limited English Proficient (LEP) and Deaf and hard of hearing members receive **training at regular intervals** on how to request the translation of written documents into other languages and alternate formats?
( ) Yes
( ) No

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Domain 4: Providing notice of language assistance services

CCOs should answer questions based on language services in place on December 31, 2022.

Questions in this domain assess **how well your CCO translates outreach materials** and explains how Limited English Proficient (LEP), and Deaf and hard of hearing populations you serve may access available language assistance services. Your responses will help OHA to evaluate how well your CCO is performing these critical meaningful language access functions.

37) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)**
CCOs must answer "yes" to meet the must pass criteria for this question (total points = 1).

Does your CCO translate signs or posters announcing the availability of language assistance services?
( ) Yes
( ) No

38) **Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)**
CCOs must answer "yes" to meet the must pass criteria for this question. Minimum points required = 4; Total points possible = 6.

Please answer **yes or no** to the methods that your CCO uses to inform members and communities in your service area about the availability of language assistance services.

	Yes	No
Frontline and outreach by multilingual staff	( )	( )
Posters in public areas in clinics	( )	( )
"I Speak" language identification cards distributed to frontline staff	( )	( )
CCO and providers websites	( )	( )
Social networking websites (e.g. Facebook, Twitter, other)	( )	( )
E-mail to members or a list serv	( )	( )

39**) Must pass beginning in the measurement year 2021 (year 1 of the incentive metric)**
CCOs must answer "yes" to meet the must pass criteria for this question (total points = 1).
Total points = 1

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Does your CCO inform LEP and Deaf and hard of hearing members about the availability of free language assistance services?
( ) Yes
( ) No

40) **Must pass beginning in the measurement year 2022 (year 2 of the incentive metric)**
CCOs must answer "yes" to meet the must pass criteria for this question (total points = 1).

Does the main page of your website include non-English information that is easily accessible to LEP members?
( ) Yes
( ) No

Thank you for completing the 2022 Language Access Self-Assessment!