

CCO Language Self-Assessment: Meaningful Access to Health Care Services for persons with limited English proficiency and persons who are Deaf or Hard of Hearing – MY2024

Introduction

As required by OAR <u>410-141-3515</u> (16)(g)(A)(B), 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 is designed to guide your CCO to (a) provide progressively higher quality language services to members and (b) to develop a more robust infrastructure for providing 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 <u>Health Equity Measure</u> requirements for <u>2024</u> CCO incentives which entail:
 - Answering all survey questions;
 - Passing the required questions for the 2021, 2022, 2023 and <u>2024</u> measurement years; and
 - Meeting the minimum points required for the <u>2024</u> measurement year (83 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 and will be worth more than one point. Responses should be based on language services in place on the final day of the assessment year (December 31, 2024).

The CCO Contracts Administrator will send the link for the online survey by December 16, 2024. All online survey responses are due on January 20, 2025. (Consistent with ORS 187.010(3), survey responses received on January 21, 2025, are considered timely.) Only online responses will be accepted; this PDF version of the survey is provided for reference only.

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:		

Domain 1: Identification and assessment for communication needs

CCOs should answer questions based on language services in place on December 31, 2024.

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. Your responses will help OHA to evaluate how well your CCO is performing these critical and meaningful language access functions.

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

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 available = 7.

	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.	()	()

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

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 available = 3.

	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) Please answer <u>yes or no</u> 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.

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 available = 4.

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

4)	Does your CCO use any of the data sources listed in questions 1 and 2 above to assess LEP and Deaf or Hard of Hearing member needs, at least quarterly?
	CCOs are required to answer this question. Must answer, no points available.
	() Yes () No
5)	Does your CCO use data sources in question 3 above to identify system gaps and improve services for LEP and Deaf or Hard of Hearing members, at least quarterly?
	CCOs are required to answer this question. Must answer, no points available.
	() Yes () No
6)	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 the CCO's new enrollee intake survey, or the first encounter with a health care provider and the information is shared back to the CCO?
	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 available = 1).
	() Yes () No
7)	Does your CCO have a process for sharing information about members who need spoken and sign language interpretation services with all provider networks?
	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 available = 1).
	() Yes () No
8)	If yes to question 7, please briefly describe how your CCO shares primary spoken language or hearing assistance needs with provider networks or service coordinators.
	Must answer beginning in the measurement year 2021 (year 1 of the incentive metric). Total points available = 1.
9)	If yes to question 7, how frequently do you share this information?
	Must answer beginning in the measurement year 2021 (year 1 of the incentive metric). Total points available = 1 .

Contact the CCO Contracts Administrator for the link.
() Weekly () Monthly () Quarterly () Annually
10) Does your CCO have a process for sharing the monthly OHA credentialed health care interpreter registry file from OHA with all your service coordinators and provider network?
Must pass beginning in measurement year 2024 (year 4 of the incentive metric). CCOs must answer "yes" to meet the must pass criteria for this question (total points available = 1).
() Yes () No
11) If yes to the previous question, please briefly describe how your CCO shares the monthly registry files with service coordinators and provider networks.
Must answer beginning in measurement year 2024 (year 4 of the incentive metric). Total points available = 1 .
12) 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? 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 available = 1).
() Yes () No
13) What are the top SIX most frequently encountered spoken and sign languages by members in your CCO for the measurement year?
Must pass beginning in the measurement year 2021 (year 1 of the incentive metric). CCOs must rank the languages members often request language services in to meet the must past criteria for this question (total points available = 1).
Write in language

This document is for reference only. The CCO must complete the self-assessment online.

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14) Please answer yes or no for each of the following statements about meml refused, did not need, needed interpretation services but were not identification interpreter services, or requested and received in-language services from providers.	fied as nee	eding
Must pass beginning in the measurement year 2022 (year 2 of the incentive must answer "yes" to at least three of the five statements to meet the must this question. Minimum points required = 3; Total points available = 5.	-	
	Yes	No
The CCO collects data on members served who self-identified as LEP but refused interpretation services.	()	()
The CCO collects data on members served who are Deaf and hard of hearing but refused interpretation services.	()	()
The CCO collects data on members served who did not have MMIS language flag but requested interpreter services.	()	()
The CCO collects data on 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.	()	()
15) Please answer yes or no for each of the following statements about appointimes (not the time to arrange interpreter service at a visit).	ntment wa	ait
Must pass beginning in the measurement year 2023 (year 3 of the incentive must answer "yes" to all statements to meet the must pass criteria for this of Minimum points required = 2; Total points available = 2.	•	COs
	Yes	No

The CCO collects quality data on average wait times for LEP members that need appointments with interpreter services.	()	()
The CCO collects quality data on average wait times for Deaf and hard of hearing members that need appointments with interpreter services.	()	()

16) Please mark the average wait time for each of the following groups (not the time to arrange interpreter service at a visit). Choose only one answer per statement.

Must pass beginning in the measurement year 2023 (year 3 of the incentive metric). Minimum points required = 2; Total points available = 2.

	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:	()	()	()	()

17) What is the average wait time (not the time to arrange interpreter service at a visit) for members that do not need interpretation services?

CCOs are required to answer this question. Must answer, no points available	CCOs are re	auired to	answer t	this (question.	Must	answer	, no	points	availab	le
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- () Same day
- () 1-3 days
- () 4-7 days
- () More than 7 days
- () The CCO does not collect this information

18) Does your CCO verifiably track when members appointments are cancelled or rescheduled due to a lack of interpretation services?

CCOs are required to answer this question. Must answer, no points available.

- () Yes
- () No

19) 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?

CCOs are required to answer this question. Must answer, no points available.

		Yes	No		
Must pass beginning in the measurement year 2021 (year 1 of the incentive metric). Commust answer "yes" to all three statements to meet the must pass criteria for this ques Minimum points required = 3; Total points available =3.					
21)	Please answer yes or no to each of the following statements about tracking assistance services at the CCO and provider network levels.	anguage			
co	uestions in this domain assess how well you use data and work processes to eformmunicate with the Limited English Proficient (LEP) and Deaf and hard of hear opulations you serve. Your responses will help OHA to evaluate how well your Control of the profession of t	ing			
cc	COs should answer questions based on language services in place on Decembe	r 31, 202	4.		
D	omain 2: Provision of Language Assistance Services				
	() Yes () No				
	CCOs are required to answer this question. Must answer, no points available.				
20)	Does your CCO have a process for identifying the total number of Deaf and hearing members that prefer sign language or assistive communication device effective communication in your CCO and provider network?		sure		
	() Quarterly () Annually				
	() Weekly () Monthly				

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Contact the CCO Contracts Administrator for the link.

	The CCO tracks staff time (including bilingual providers) spent providing bilingual spoken and sign language assistance services.	()	()
22	Please select yes or no to the types of language assistance services that are p your CCO and provider network.	rovided	by

The CCO tracks the use of language assistance services such as interpreters

and translators.

()

()

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 available = 7.

	Yes	No
Bilingual clinic staff and providers	()	()
CCO in-house interpreters (spoken and sign)*	()	()
CCO in-house translators (for documents)	()	()
Contracted in-person interpreter services	()	()
Contracted translators (for documents)	()	()
Contracted telephonic interpreter services	()	()
Contracted video interpreter services	()	()

^{*}If the CCO reports that it does not have any in-house interpreters, the CCO can skip Q35 and gets a point, which is required must pass starting MY2023.

23) 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.

Must pass beginning in the measurement year 2021 (year 1 of the incentive metric). CCOs must answer "yes" to at least six of the eight statements to meet the must pass criteria for this question. Minimum points required = 6; Total points available = 8.

	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	()	()

24) Please select yes or no to indicate whether your CCO provides spoken and sign language interpretation service for member visits in each of the following situations.

Must answer beginning in the measurement year 2024 (year 4 of the incentive metric); total points available = 6. Must pass beginning MY2025 (year 5) with minimum pointed required = 6; total points available = 6. CCOs must answer "yes" to all six statements to meet the must pass criteria for this question.

	Yes	No
Scheduling appointment	()	()
Care navigation	()	()
During member appeals process	()	()
Customer Service inquiry	()	()
Support for understanding member benefits	()	()
Member care consent process	()	()

25) Does your CCO and provider network have policies on the use of family members or friends to provide interpretation services?

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 available
1).

() Yes

() No

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

Must answer beginning in the measurement year 2021 (year 1 of the incentive metric). Total points available = 1.

27)	Does your CCO provide staff who coordinate interpreter services with inform to access OHA approved spoken and sign language interpreters?	ation on	how
	Must pass beginning in the measurement year 2021 (year 1 of the incentive measurement answer "yes" to meet the must pass criteria for this question (total points 1).		
	() Yes () No		
28)	Does your CCO have a policy that your provider networks work with OHA cer qualified spoken and sign language interpreters, consistent with OAR 950-05		d
	Must pass beginning in the measurement year 2024 (year 4 of the incentive memust answer "yes" to meet the must pass criteria for this question (total points 1).		
	() Yes () No		
29)	Does your CCO staff who coordinate interpreter services have a process for v OHA credentials of the following spoken and/or sign language interpreters be allowing the interpreter's visit to be reported as delivered by an OHA-certific qualified health care interpreter?	efore	
	Must pass beginning MY2025 (year 5) with minimum pointed required = 3; total available = 3. CCOs must answer "yes" to all three statements to meet the must for this question.	-	iteria
		Yes	No
ı	n-person interpreters	()	()
7	elephonic interpreters	()	()
\	/ideo remote interpreters	()	()

30) Please select yes or no to each of the following statements about the translation of vital

Must pass beginning in the measurement year 2021 (year 1 of the incentive metric). CCOs must answer "yes" to all six statements to meet the must pass criteria for this question.

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written documents into non-English languages.

Minimum points required = 6; Total points available = 6.

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

31)	Does your CCO's contract with interpreting services companies require the companies to
	work with OHA-credentialed spoken and sign language interpreters consistent with OAR
	950-050-0160 when providing interpretation services to your CCO and/or provider
	network?

Must pass beginning in the measurement year 2025 (year 5 of the incentive metric). CCOs
must answer "yes" to meet the must pass criteria for this question (total points available :
1).
() Yes

() No

() We do not have an interpreter services vendor

32) Are the translated documents available in alternate formats that include large prints or braille?

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 available = 1).

() Yes

() No

33) When your CCO updates information on its website, does it also include non-English language translation of the content?

	CCOs are	required to	answer thi	s auestion.	Must answer	. no points	available.
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() Yes

() No

34) 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.

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

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

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

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 available = 4.

	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.	()	()

36) 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' credentials.

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 available = 7.

	Yes	No
Bilingual clinic staff and providers	()	()
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	()	()

37) 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 interpreters' credentials) for appointments in each of the following care delivery settings? Please select yes or no to the following statements.

Must pass beginning in the measurement year 2023 (year 3 of the incentive metric). CCOs must answer "yes" to at least six of the eight statements to meet the must pass criteria for this question. Minimum points required = 6; Total points available = 8.

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

38) Please answer yes or no to the following statements related to standardized proficiency assessments for bilingual clinic staff and interpreters (this question does not apply to inlanguage visit providers).

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 available = 2.

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

39) Please briefly describe your policies related to assessment, passing scores, and documentation of language proficiencies for both (a) bilingual clinic staff and (b) inlanguage service providers.

Must answer beginning in the measurement year 2024 (year 4 of the incentive metric). CCOs are required to answer this question. Total points available = 1.

Domain 3: Training of staff on policies and procedures

CCOs should answer questions based on language services in place on December 31, 2024.

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.

40) 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?

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 available = 1).

- () Yes
- () No
- 41) 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.

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

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

42	Are all CCO staff members who interpret for patients (such as full-time staff interpreters or dual-role interpreters) trained and certified or qualified by OHA?
	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 available = 1).
	() Yes () No
43) 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?
	CCOs are required to answer this question. Must answer, no points available.
	() Yes () No
I	Domain 4: Providing notice of language assistance services
(CCOs should answer questions based on language services in place on December 31, 2024.
ł	Questions in this domain assess how well your CCO translates outreach materials and explains now 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.
44	Does your CCO translate signs or posters announcing the availability of language assistance services?
	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 available = 1).
	() Yes () No
45) 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.
	Must pass beginning in the measurement year 2021 (year 1 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 = 4; Total points available = 6.
	Yes No
_	

Frontline and outreach by bilingual or multilingual staff (CCO staff and provider staff)	()	()
Posters in public areas in clinics	()	()
"I Speak" language identification cards distributed to frontline CCO and provider staff	()	()
CCO and provider websites	()	()
Social networking websites (e.g., Facebook, Twitter, other)	()	()
Email to members or a listserv	()	()

46) Does your CCO inform LEP and Deaf and hard of hearing members about the availability of free language assistance services?

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 available = 1).

- () Yes
- () No

47) Does the main page of your website include non-English information that is easily accessible to LEP members?

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 available = 1).

- () Yes
- () No

Thank you for completing the 2024 Annual CCO Language Self-Assessment!

