



Policy & Procedure

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:	12/1/2019	Published Date:	8/9/2019
Revision Published Date:	12/13/2019	Next Annual Review Date:	8/2020
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 who live in households where there is no telephone. 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.

B. Telephone interpreter services for non-English speaking members

1. Qualified interpreters are available to communicate in the primary language of non-English speaking members. Such interpreters are linguistically and culturally appropriate and are capable of communicating in English and the primary language of the member and are able to translate clinical information effectively.
2. Customer service representatives are trained to coordinate telephone interpreters for communication with OHP members.
3. 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.
4. When a non-English speaking member comes to an ODS Community Dental administrative office, a customer service representative coordinates a conference call with an appropriate interpreter.
5. 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.

IV. Provider Access to Interpreter Services

C. Hearing or Speech-impaired members

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. ODS Community Dental provides qualified sign language interpreters for covered dental care visits to interpret for hearing and speech impaired OHP members.
3. The interpreter service bills and is reimbursed by ODS Community Dental.

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 for this.
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.
4. Providers are informed of the process for arranging interpreter services in their provider manual.
5. The dental OHP member handbooks and provider directories inform the member that their provider will coordinate interpretation services.

E. Member communications

1. All member mailings:
 - a. Include a tagline sheet explaining the availability of materials in alternate formats, such as large print, and listing 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

- i) Written communications are translated and made available to all members, family members, and/or caregivers in non-English languages, upon request.
- ii) ODS Community Dental contracts with a translation service provider to translate written materials.

V. 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.

VI. Related Policies & Procedures, Forms and References

Policies & Procedures

OHP Dental Access Policies and Procedures

Forms and References

Checklist for writing member communications

OAR Standard: 410-141-0220 (7)

VII. Revision Activity

New P & P /Change / Revision and Rationale	Final Review/Approval	Approval date	Effective Date of Policy/Change
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

VIII. Affected Departments:

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