



**Concierge Service for Accessibility  
As a Direct Result of Federal Laws:  
Non-Discrimination, Cultural Competency,  
Language Proficiency and ADA Review**

This plan is a compilation of Federal and State Regulations following Health and Humana Services (HHS) recommendation for Language Assistance Plan (LAP) and Office of Civil Rights recommendations for Cultural Competency plans.

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## Introduction

Humana, headquartered in Louisville, Kentucky is one of the nation's largest publicly traded health benefits companies. Humana offers coordinated health insurance coverage and related services to State plans, employer groups, government-sponsored plans and individuals.

Humana's Language Assistance and Alternative Formats Services recognizes cultural differences and the influence race, ethnicity, disabilities and primary language have on the health care experience, quality of care and health outcomes.

Humana employs a functional application of cultural competence, through the use of evidence-based tools and resources, to reduce inequity across the health care system and serve its multicultural population.

Humana is committed to developing strategies that reduce gaps in quality and strive toward the elimination of health disparities.

Tactics for quality improvement include provider and workforce development and training, data collection and analysis, and the provision of language-access services.

The Humana Concierge Service for Accessibility focuses on discrimination processes as a direct result of Federal and State laws. This plan describes the structure, processes, and standards used to provide language assistance, at no cost, to limited English proficient (LEP) and ADA members.

This includes appropriate access to oral interpretation services in 200 languages, video interpretation in 27 languages including American Sign Language and translated alternative formats to individuals with disabilities and Non-English threshold languages.

## Purpose

The purpose of this document is to describe Humana's Concierge Service for Accessibility Language Assistance Plan (LAP) including the comprehensive processes. This includes but not limited to the standards that apply to Humana's assessment of members' linguistic needs, provision of language assistance services, staff training, and compliance monitoring

This written plan documents the processes and standard in place currently and benchmarks established to ensure continuous improvement of our language assistance services and alternative formats on an ongoing basis as a direct result of regulatory requirements issued by the Department of Justice (DOJ), Health and Human Services (HHS), Centers for Medicare and Medicaid (CMS), Office of Civil Rights plus other requirements plus individual state requirements where Humana conducts business and provides products and services (i.e. California).

## **HUMANA CONCIERGE SERVICE FOR ACCESSIBILITY LANGUAGE ASSISTANCE PLAN (LAP)**

### **Overview**

We follow the Department of Justice (DOJ), The U.S. Department of Health and Human Services (HHS), Centers for Medicare and Medicaid Services (CMS), Office For Civil Rights (OCR) as well as State DOI's in regard to guidance to ensure "equality of opportunity" to ensure meaningful access for all members (current and future) regardless of race, language, sex/gender, ethnicity, and/or disabilities.

- Title VI of the Civil Rights Act 1964
- Section 504/508 of the Rehabilitation Act of 1973
- Age Discrimination Act of 1975
- Americans with Disabilities Act (ADA) of 1990, 2008, and 2010,
- Executive Order 13166 of 2000
- Section 1557 of Affordable Care Act (ACA) of 2010 and 2016

Humana's focused is to ensure "equal opportunity for equal access" to healthcare services and activities.

Humana is committed to providing language assistance in order to improve programs and services for all members. In 2018, Humana has recently launched national efforts to improve alternative formats to members by reducing cycle time from CMS or California approval to delivery of an accessible formatted document based on the members request (i.e. Braille, Large Print, Audio, Accessible PDF, or Read Orally). The identification of members has spearheaded off original work that was performed in 2015 based on the self-reporting form in MyHumana where members can identify their preferred language preference, communication preference, disability and alternative format requirements.

Humana focuses on continuous improvement for our Non-English and ADA members via work-plans that are compiled based on customer inquiries, complaints, satisfaction surveys and regulatory compliance.

The purpose of these services is to provide maximum language accessibility to Humana's Non-English and/or Individuals with disabilities members. Humana follows the Health and Human Services Language Assistance Plan model.

The Humana Language Assistance Plan model elements are:

- Element 1: Assess Needs and Capacity
- Element 2: Oral Language Assistance Services
- Element 3: Written Translation of Vital Documents
- Element 4: Policies and Procedures
- Element 5: Notification of Availability of Accessible Services
- Element 6: Staff Training

- Element 7: Access and Quality
- Element 8: Stakeholder Consultation
- Element 9: Emergency and Business Continuity Preparedness
- Element 10: Digital Information
- Element 11: Compliance, Evaluation and Reporting

## **Scope**

The Humana Concierge Service for Accessibility is a centralized service through all Humana and Humana-owned entities. The Humana Concierge Service for Accessibility is accountable for ensuring “equal opportunity for equal access to healthcare services and activities” for all Humana members. A listing of business areas is EAP Plan, Small Group Medical, Medicare Plan, Medicaid Plan, Work Life Benefits, Small and Large Group Dental, Individual Plans, Pharmacy, State Mandated Plans, Providers (owned/delegated), Acquisitions, plus any Humana business current and future.

## **Provider and Vendor Oversight**

Non-Humana owned providers and vendors based on network contracts are required as a direct result of Federal law to abide by all discrimination laws this includes Americans with Disability Act, Executive Order 13166 and Section 1557.

Humana regularly audits providers (i.e. doctors, SNF's, Hospitals) and vendors regarding accessibility (physical and effective communication accessibility) to ensure compliance with Federal and State regulations (i.e. sign language interpretation for hearing impaired patients).

## **Discrimination is Against the Law**

Humana complies with applicable Federal civil rights laws and does not discriminate on the basis of race, color, national origin, age, disability, gender, sexual orientation or religion.

Humana does not exclude people or treat members differently based on race, color, national origin, age, disability, gender, sexual orientation or religion.

If you believe that Humana, in-network provider or Humana vendor has failed to provide services or has discriminated in another way on the basis of race, color, national origin, disability, gender, sexual orientation or religion, you can file a grievance with customer care at 1-800-457-4708 or at the number on the back of the member's id card.

**Customer Care:**

Phone number for customer care is located on the back of your member id card. Members can also call 1-877-320-1235 and select their product or choice option 9 for accessibility assistance.

Additional numbers:

Individual and Family Insurance – 1-800-833-6917

Medicare Customer Service – 1-800-457-4708

Dental/Vision Insurance – 1-877-877-1051

Insurance through Employers – 1-800-448-6262

**Grievance and Complaints**

If you were discriminated against, or if Humana or a healthcare provide did not accommodate your needs, we will promptly address the matter. Please call Humana Customer Support at the number on the back of your member ID care. TTY services can be reached by dialing 711 for a relay operator and the number on the back of your Id card or send an email to [accessibility@humana.com](mailto:accessibility@humana.com) (please no personal information – only a phone number for us to call you back).

If you believe that Humana has failed to provide these services or discriminated in another way on the basis of race, color, national origin, age, disability, gender, sexual orientation or religion you can file a grievance with customer service the number on the back of your id card or contact:

Steve Amshoff

Civil Rights/LEP/ADA/Section 1557 Compliance Officer:

500 W. Main Street

10<sup>th</sup> Floor

Louisville, Kentucky 40202

Phone: 1-877-320-1235

Fax 1-877-320-1269

Email: [accessibility@humana.com](mailto:accessibility@humana.com) or [samshoff1@humana.com](mailto:samshoff1@humana.com)

You can file a grievance in person, or by mail, fax, or email. If you need help filing a grievance Steve Amshoff, Civil Rights/LEP/ADA/Section 1557 Compliance Officer is available to help you at the contact information listed above.

You can also file a civil rights complaint with the U.S. Department of Health and Human Services, Office of Civil Rights (OCR) electronically through the Office for Civil Rights Complaint Portal, available at <https://ocrportal.hhs.gov/ocr/smartscreen/main.jsf>, or by mail or phone at:



U.S. Department of Health and Human Services  
200 Independence Avenue, SW  
Room 509F, HHH Building  
Washington, DC 20201  
1-800-368-1019  
1-800-537-7697 (TDD)

Complaint forms are available at <https://www.hhs.gov/ocr/complaints/index.html>.

### **Responsible Oversight**

Humana Concierge Service for Accessibility is responsible for identifying LEP requirements and identifying communication requirements. The group is responsible for maintaining and regularly auditing outreach plans (internal and external) to ensure that diverse members (present and future) receive meaningful access in an understandable and easy to use manner.

### **Measurement of Success**

A sample of measurement tools that are utilized in combination with self-reporting tools, these are: customer service capturing of language and disability, member satisfaction, focus groups and provider satisfaction surveys to ensure Humana is ensuring members have equal opportunity for equal access.

### **Best Practices**

Based on Competitive analysis (industry and other benchmark standards) Humana strives to create best practices based on continuous improvement by establishing an LAP for the Humana enterprise including acquisitions. The Humana Concierge Service for Accessibility has created processes and procedures that are utilized centrally and a tracking system to ensure disabled members interactions are tracked and their alternative formats requests. It is important to monitor and evaluate effective communication internally and through the industry based on how other groups are delivering similar services as a direct result of Federal laws.



## Element Summary

### **Element 1: Assessment: Needs and Capacity §2538.3(b)(3) & §2538.4(a),(b)**

**Regularly identifies and assesses the language assistance needs of its current and potential members and ensures the workforce reflects the diversity of the membership that we serve**

- Humana regularly reviews current member mix, federal, state and local statistics to ensure consistent sources for evaluating language and disability needs are used when determining the effective and efficient mix of communication methods (i.e., U.S. Census data, American Community Survey, etc.). Numerous tools are utilized including but not limited to Geoscape data analysis, Rand analysis and other guidance provided by the Federal and State governments. HHS/CMS, NIH and State DOI's (i.e. California) provide guidance yearly in regard to counties demonstrating population shifts or language thresholds being surpassed based on the 5% rule.
- A yearly review of county data for each area that Humana has products and services to verify 5% rule of the population that has potential to be served. Based on this data threshold languages are determined versus frequently encountered language to ensure effective communication is occurring. If the population is not at threshold than written materials are read over the phone to the member in their language if a request for alternative formats is requested.
- Humana utilizes the four factor analysis as provided by the Department of Justice (DOJ) to determine and measure meaningful access. It is important to consistently monitor the demographics and community to ensure Humana's LAP mimics the population and community that we serve. Our continuous collection of data of the population enables our ability to monitor and match requirements and needs based on threshold languages.
- Based on Threshold language assessment all communications that are English are available in Spanish.
- Self-reporting form on MyHumana for enrollees to self-report language preference or disability (i.e., deaf, blind, limited sight, etc.).

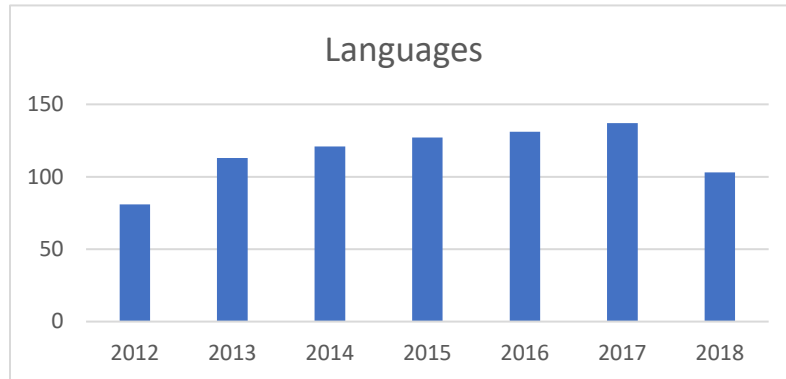
#### **Threshold Language**

Spanish is the threshold language based on the members (current, future, and potential) we serve based on the 5% rule by county in markets that we offer products and services. Humana staff mimics the threshold populations by having bi-lingual staff

that assist our Spanish members.

**Frequently Encountered Languages**

Humana serves members in over 103 languages (including American Sign Language) this has dropped with the reduction of the Affordable Care Act States (ACA) but has not returned to our 2012 levels of 81 languages prior to ACA, due to Medicaid being a growth area for Humana.



The threshold and frequently encountered mix has changed slightly due to the exiting out of the Illinois Medicaid market the need for Polish has decreased replaced by Cantonese and Russian. There is a very large gap between Threshold language and Haitian Creole in 2018 only 3000 calls occurred whereas Spanish calls are 95% of the Non-English requests.

**Threshold**

- Spanish

**Frequently Encountered**

- Haitian Creole
- Vietnamese
- Mandarin
- Cantonese
- Korean
- Russian

**Four-Factor Analysis “vital” communications**

The four-factor analysis is provided by the Department of Justice (DOJ) as a methodology to measure if “vital” communications must be provided in writing based on a population in a county that has the potential to be serve is over 5%.

**Criteria:**

- The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
- The frequency with which LEP individuals come in contact with the program;
- The nature and importance of the program, activity, or service provided by the program to people’s lives; and

- The resources available to the grantee/recipient and costs. The guidance is to ensure equal opportunity for meaningful access to critical services and benefits including healthcare.

Humana has developed a flexible process with continuous review that addresses the needs of our LEP and individuals with disabilities based on the four-factor analysis. Audits, Quality Checks, Benchmarks and population analysis occurs on an on-going basis to ensure meaningful access to the populations we serve.

Humana reviews quarterly and yearly county and state data as well as CMS or other government entity data to assist in determining the mix of language assistance needed to be thoughtful and not limited based on resources and costs.

**Safe Harbor**

Safe Harbor is a DOJ recommendation that ensure with greater certainty that Humana meets the language assistance requirements for meaningful access that will provide strong evidence of guidance regarding LEP populations for written materials.

- Recommendation- written translation of “vital” documents for populations that constitute five percent, or 1,000 members of the “eligible” population served or “likely” to be encountered.
- If there are fewer than 50 persons in a language group that reaches the five-percent trigger than written communication of “vital” materials is not required but a written notice in the primary language of the member must be provided with the right to receive oral interpretation of their materials through a competent and proficient interpreter at no cost.
- If population is less than 5% or 1,000 members than a plan in place to provide “oral” interpretation via phone, video or in-person must be provided at no cost.

The safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

For example, even where the safe harbor numbers are not met for a language, an LEP person speaking that language should be given appropriate oral interpretation of important information.

Humana members that request written materials in a language other than English or Spanish are added to the Concierge Service for Accessibility and a proficient and competent interpreter contacts that member regularly to read their communications to them in their language.

**Survey of Linguistic Needs:**

Per Federal requirements, Humana collects linguistic needs are collected to ensure the needs of the member/enroller are met to ensure equal opportunity for equal access. Humana has a portal for members to review their claims and program information. A self-reporting language and communication form is available for members to self-report their preference and if they have a disability. Based on the self-reporting forms for those members, health questionnaire and survey of members in California the population mix is the following:

Preferred Written Language:

English	92.1%
Spanish	6.5%
Other	1.4%

Preferred Spoken Language

English	90.8%
Spanish	7.1%
Other	2.1%

Race/Ethnicity

Caucasian/White	82.1%
Hispanic/Latino	7.6%
African American	3.7%
Asian	2.8%
Other	3.8%

Humana’s insured population in California is less than 300,000. Based on the survey results Humana met the threshold set by the Department of Insurance based on the Spanish population being over 5%. Therefore, Humana provides documents in both English or Spanish based on the members preference.

Humana employs the use of neutral Spanish and recognizes the Real Academia Espanola Dictionary (RAE) as the ultimate arbiter for Spanish language matters.

Humana is continuously re-evaluating “vital” materials and communications regularly to ensure members needs are met.

**Effective Communication Self-Reporting**

Humana has a self-reporting form for all Humana members to self-report their language preference (250 languages using ISO639), disability and their communication methods (i.e. Alternative formats, Non-English languages, sign language interpretations, interpreter for the blinds, email, phone, mail...etc).

Alternative format communication methods are: Braille, Large Print, Accessible Screen Reader PDF, Audio, Daisy, Read Orally Over the Phone in their language). Once a request for an alternative format is requested this becomes a “single or standing

request” and as a direct result of Federal law, all their communication must go to the member in this format.

### Measurements for Element 1

- Proportion of LEP person from a language group “served” or “encountered” in the eligible service population (i.e. County, State).
  - The greater the number the increased need for language services
  - Populations served and potential served calculated separately based on Medicare or Medicaid eligible participants
  - Past, current, potential and future threshold based on trending data
- Frequency of contact based on customer touch points that affect the members health or create consequences for member
  - Over the phone interpretation analysis
  - primary usage versus secondary usage of Humana staffing
- Percent of vital communications (those communications that create consequences or negative impact member’s health)
  - Matrix identifying vital documents (denial, EOC’s, ANOC’s, benefit descriptions, claims, bills)
  - Cross-referenced by vital documents available in written translation and if not available in written translation ALL documents are available via reading over the phone in the language of the member.
- Percent of mix of language assistance services
  - Over the phone interpretation percentage
  - Materials available for download percentage
  - Written materials translated percentage
  - Internal bilingual staff based on customer-facing touch points
  - Percent of qualified translators
  - Percent of qualified interpreters.

## **Element 2: Oral Language Assistance Services §2538.3(b)(5) & §2538.6**

### **Testing and attestation of internal and external translators to confirm proficiency and ethics of staff.**

Humana ensures that the Humana staff mimics the population that is served. The primary staffing at customer touch-points is bi-lingual (English and Spanish). Given that Spanish is a threshold language the primary source for bi-lingual language preference is Humana staff and the secondary source for Spanish is an outside vendor that provides language assistance in over 200 languages (Voiance).

As a direct result of Federal law, Humana provides irrespective of whether the language is identified as one of the threshold languages. Oral language assistance is provided through all customer touch-points to ensure timely communications and avoids the effective denial of service, benefits and does not delay benefits to LEP members including ASL members.

Oral interpretation services offered in more than 200 languages (over the phone), plus video remote interpretation (VRI) in 27 languages, including American Sign Language.

Review of requirements with providers regarding oral interpretation services (150 languages at minimum) and sign language capabilities (in person or by video) to ensure providers meet the requirements of Limited English Proficiency (LEP) and sign language interpretation (ADA).

### **Over the Phone Interpretation**

As a direct result of Federal law, Humana offers Non-English languages in a minimum of 150 languages through an outside vendor (Voiance) up to over 200 languages. Non-English languages are offered via Over the Phone at all Humana touchpoints.

Due to the reduction in Affordable Care states and the increase of Bi-Lingual Humana customer service representatives the usage of Over the Phone Interpretation has declined from \$4.1 million in 2016 to \$2.8 million in 2018 this is still significantly over the requirements for over the phone language in 2012 when the Over the Phone requirements before Medicaid states utilizing Managed Care Organizations and Affordable Care Act went into effect.

Over the Phone Interpretation requirements are flattening out due to the expansion of Medicare and Medicaid plus the centralization of Over the Phone Interpretation to all lines of business including Humana wholly-owned and partially-owned entities.

We do anticipate increases based on expansion activities by Humana (i.e. Medicaid expansion).



Humana has roughly 5000 associates that are proficient and competent per Section 1557 of the Affordable Care Act in English and the language they speak with the member. All Humana associates that are bi-lingual prior to communicating with members in a language other than their native language must pass the ILR (Interagency Language Rating) scale based on Federal Government standards of a “3” or better in English and the language spoken to members. If an associate does not score a “3” than they must utilize Over the Phone interpretation services.

The ILR assessment is provided unbiased by an outside vendor that is certified in the ILR assessment (ALTA).

Humana provides individual access to qualified oral interpretation or in-language services to all LEP members according to the standards of quality and timeliness at customer touch-points.

**Inbound phone call (in-language)**

Humana’s automated information line (AIL) is available in English and Spanish. Humana Customer Care also has a dedicated Spanish line, staffed by bilingual (English and Spanish speaking) associates, to assist Spanish speaking members with requests beyond those available through the automated line.

**Inbound phone call (interpretation)**

Humana uses a vendor (Voiance) to assist LEP callers through over-the-phone interpretation when bilingual Spanish-speaking Humana associates are not available to provide in-language services.

**Outbound phone call (Interpretation)**

Prior to initiating an outbound call to an LEP member, the customer care specialists can conference in Voiance to obtain an interpreter if a bilingual specialist is unavailable to handle the call.

**Site of Enrollment**

If an agent/enrollment representative needs assistance with interpretation of enrollment materials for a prospect, they can call Voiance directly to have an interpreter assist.

Humana adheres to the following processes and standards to provide qualified and proficient Spanish language services to Spanish-speaking members at no cost.

- Spanish-speaking members have access to a dedicated Spanish line, staffed by bilingual (English and Spanish speaking) customer care specialists. The number to Humana’s customer care center can be found on the back of the members identification card.
- When a members first calls Humana’s Customer Care Center, the member has the option of proceeding in Spanish. The LEP member is than routed to the Spanish AIL, which guides members through various initial call prompts and

menu options to help the member obtain information themselves and/or route the call to the appropriate areas.

- Spanish-speaking members can perform self-service functions such as request new identification cards, proof of insurance, or health savings account (HSA) withdrawal via the AIL or online through MyHumana.
- If the member opts out of the AIL or is automatically opted out, the call is routed to a bilingual Humana customer care specialist.
- Bilingual customer care specialists undergo additional training in appropriate terminology and ethics in both English and Spanish. Spanish language proficiency is verified prior to hiring a bilingual associate.
- Spanish calls are monitored and evaluated for call quality according to the same evaluation process for English calls. These calls are audited by bilingual quality associates.
- A Humana customer care specialist can transfer a Spanish-speaking member in need of language assistance to a bilingual customer care specialist at any time through a warm transfer process. If a bilingual customer service representative is unable to answer the call within a reasonable amount of time, the customer care specialist can obtain over-the-phone language interpretation, according to the procedure.
- If a member requires Spanish interpretation of a plan-produced document, the member notice instructs the individual to call Humana's Spanish line and request interpretation or request the information in Spanish for all future communications.
- Associates who speak with members in another language are assessed using the Inter-agency Language Rating Scale (ILR), a government developed standard assessment tool, provided by an unbiased third-party vendor of Humana (ALTA). The Humana standard for proficiency and competency in a language is a level 3 (General proficiency) scored in both English and the language that they speak to members (i.e. Spanish)

Humana adheres to the following processes and standards to provide qualified over-the-phone interpretation services to LEP members in at minimum of 200 languages at no cost.

- Humana uses over-the-phone language interpretation to provide interpretation services to LEP members at all Points of Contacts. The over-the-phone interpreters have been confirmed and attested that they are proficient and competent in English and the language that they speak. Given there are not central certification for in-person interpreters to verify proficiency and competency and not place the member at risk, over-the-phone interpretation is

the preference for LEP interpretation unless the member is hearing-impaired than special accommodations are created.

- Humana informs members of their rights to access interpretation services in their preferred language at all points of contact.
- Humana’s web provider portal includes notice to advise providers how to setup Over the Phone interpretation services for them to meet Federal regulations.
- Humana contracts with a vendor, Voiance, to provide interpretation services for LEP members who speak languages other than English or Spanish, or when heavy call volume prohibits Humana bilingual staff from accommodating the calls.
- When a customer care specialist answers a call and determines the need for an interpreter, or an LEP member requests an interpreter, the Humana representative conferences the call to obtain telephone interpretation services from Voiance, according to the procedure. Among calls that are transferred to Voiance, 90% are answered in 30 seconds or less to ensure the meeting of CMS 7-minute rule for interpretation. During the call, the Voiance interpreter listens to the LEP members and the Humana customer care specialist accurately conveying questions and responses to both parties.
- Humana discourages LEP members from using family members, friends, or minors as interpreters
  - If an LEP member requests the use of a family member or friend as an interpreter, Humana still provides interpretation through a qualified interpreter through Voiance.
  - If the member refuses the use a professional interpreter during contact with the Customer Care Center, Humana will have an interpreter on the line for assistance to ensure effective communication this is required by Section 1557 of the Affordable Care Act.
- If an LEP members requires interpretation of a plan-produced document into a language other than Spanish, that member will be added to the Concierge Service for Accessibility to have their information read to them over the phone regularly through-out the month or when important communications arrive at their home.

**Vendor: Voiance**

Humana contracts with Voiance to provide over-the-phone interpretation services for LEP members in the member’s preferred language. Voiance adheres to the following quality assurance standards and processes to confirm proficiency and adherence to a code of ethics among interpretation staff:

- Voiance education and training of staff meet and exceed the standards of the California Healthcare Interpreters Association and the National Council on Interpreting in Healthcare:
  - Passing of the Interagency Language Rating Scale at 4 plus (business professional) in both English and the language they speak to members.
  - 120 hours of in-house training for interpreters “in language”
  - two-weeks of supervisor observed calls
  - quality audits (in-person and listening) – every week
  - Zero tolerance for mis-interpretation or violating of interpretation rules and ethics.
  
- Voiance professionally trains, tests, and certifies its interpreters with a rigorous testing process to validate:
  - Competency in both source and target languages;
  - General knowledge and intimate familiarity of both cultures;
  - Ability to express thoughts clearly and concisely in both languages;
  - General knowledge of the subject to be interpreted;
  
- Voiance interpreters receive messages in the source language and repeat it in the target language with cultural sensitivity, rather than providing a literal interpretation.
  
- Voiance interpreters have a fundamental knowledge in both languages of healthcare terminology and concepts relevant to the business, terminology, concepts and protocols of health plans. Voiance interpreters are required to fully comply with a code of ethics.

Humana’s procedures for monitoring interpretation services in order to confirm compliance with the LAP are as follows:

- Humana monitors the availability of interpretation services in the threshold languages that are requested on behalf of the LEP member at all points of contact
  - Humana customer touch-points operate from 8:00am to 6:00pm CST, Monday-Friday
  - Voiance Interpreter Services are available 24/7 if a customer touch-point requires interpreter services ( Humana at Home Nursing Assistance Line).
  - Concierge Service for Accessibility is available to disabled members and Non-English that are part of the Concierge Service 24/7
  - Humana Spanish speaking teams are available in in-language service from 8:00 am to 6:00 pm CST Monday-Friday
  - Humana’s call quality assurance teams monitor whether calls requiring interpretation are transferred to correctly to Voiance.
  - Foreign language calls are held to the same service level standards as English Calls: 80% of calls answered within 20 seconds.

- Humana monitors the quality of interpretation services in the threshold language (s) at all points of contact:
  - All calls to the Customer care center undergo a quality assurance monitoring process. Both calls handled by Humana's Spanish-speaking team and those that include interpreters from Voiance are monitored in the same way as English calls.
  - The call quality team monitors approximately 7-8 calls per month per associate and issues monthly reports on call quality results. A monthly meeting is held to review results and feedback forms, to identify coaching opportunities, additional training or guideline/procedure updates.
  - Foreign language calls are held to the same quality service standards as English calls, this includes:
    - delivery of accurate, complete and relevant information;
    - Resolution of the member's issue on first contact (first pass rate);
    - Utilization of all available resources to resolve the caller's inquiry in an accurate and efficient manner;
    - Courteousness and professionalism on behalf of the customer care specialist and interpreter
    - Anticipation of the member's needs.
- Humana monitors the utilization of interpretation and bilingual services on behalf of the LEP membership requesting assistance in the threshold languages at all points of contact:
  - The Customer care center monitors and reports the number of encounters that are transferred to the Spanish-speaking team and Voiance.
  - Codes in the call handling systems indicate the instances when language assistance is used.
- Provide oral language assistance in both face-to-face and over the phone that address needs identified in Element 1
- Establish a point of contact for individuals with LEP or Disability issues through a central phone number
- Provide oral language assistance to ensure meaningful access to participate fully in programs, services and benefits
- Provide language assistance through a variety of means including bilingual staff, contract Interpreters that are proficient and competent.
- Ensure interpreters are proficient, competent, practice ethics and confidentiality

### **Sign Language Interpretation**

Sign Language interpretation is provided to Humana owned facilities including Humana owned provider offices, and home health care. Sign Language interpretation is provided either in-person or via video remote interpretation (vri). Due to the shortage of in-person interpreters Humana has developed a robust VRI network that is focused on real-time.

Humana has a certified hearing-impaired sign language interpreter that works directly with our deaf members via a videophone. This information for the videophone is posted on the Humana.com Accessibility website, the number is 361-214-1050. Any member that is identified as deaf is able to contact Humana via the video phone for direct assistance and special accommodations.

Sign language interpretation requirements has grown from 2500 requests in 2017 to over 5000 requests in 2018 mainly due to the model notice of discrimination is part of every communication. The other issue is that network providers are not providing sign language interpretation placing Humana at risk of a lawsuit, especially in Medicaid states (i.e. Florida).

**Providers in Network and Federal laws**

Providers in the Humana network per their provider contract are to abide by Federal and State laws. This includes providing Over the Phone Interpretation in at minimum 150 languages and sign language interpretation.

Humana has procedures for providers to follow to setup their own Over the Phone accounts if they do not currently already have one. If a member is discriminated against based on non-provision of Over the Phone Interpretation or Sign Language, then a grievance can be filed against the provider by the member.

Humana will provide an interpreter interim while the provider is being educated as to their responsibility. A network provider that continues to discriminate against a Non-English or Disabled member is removed from the network and reported to the State or CMS.

Humana has partnered with Voiance to create an easy process for providers to meet the government regulations with a pay as you go model to assist providers in meeting compliance.

Access is available at:

<https://www.voiance.com/services/AccountSignUp/ServiceAgreement.aspx?g=d0db2690-d029-4197-8eee-27e292848969>.

### **Element 3: Written Translation §2538.3(b)(4) & §2538.5, Section 1367.04 (b)(1)(A)(iii)**

#### **Identify, translate and make accessible in various formats including print and electronic media, vital documents in languages other than English including threshold languages**

Humana's strategy is to ensure "equality of opportunity" for meaningful access to health care services and activities.

Effective communication with enrollees promotes increased compliance and adherence to follow-up treatment, improved use of and access to preventive care, better understanding of covered services, navigation of the complex health care system and improved member satisfaction.

Humana provides, at no cost, appropriate access to oral interpretation services in 200 languages, video interpretation in 24 languages, including American Sign Language and translated written materials of vital documents based on threshold languages and auxiliary aids required by disabled enrollees (current and future).

Humana follows the Department of Health and Human Services' framework for Limited English Proficiency (LEP) and ADA enrollees for the development of the language assistance and alternative formats section of the Language Assistance and Alternative Formats Services. The framework is described below:

- Humana's threshold language in the state of California has been identified as Spanish
- If a document is in English than it is available in Spanish
- Humana's translation department has a defined intake process to provide efficient and effective delivery of timely and accurate translation service.
- Humana uses the four-factor analysis in determining the translation of "vital" written materials into a language at threshold or "frequently encountered" populations.
- "Vital" documents within a health care plan are those that ensure access to a benefit, service, right or encounter and may create a consequence to the health of the LEP member if not provided in a timely manner in a format the LEP/ADA member can understand.
- Translation of vital information into Spanish is performed according to written translation standards of quality, accuracy and timeliness.
- Member materials are compliant with state readability requirements.
- Internally and externally produced translations are evaluated for quality, accuracy and timeliness.
- Alternative formats are available upon request and once the request is made this is a single request or standing request. The disabled or Non-English member/enrollees information is provided in that format.



- Alternative formats are available in Braille, Audio-CD, Audio- USB, Accessible Screen Reader PDF, Daisy, Large Print and Orally Over the Phone.
- Oral Interpretation of vital documents is available in more than 200 languages on request.
- Alternative Format Materials are available in English and Spanish.
- Oral interpreters for blind enrollees are trained to speak with blind enrollees and to read communications.

### **If in English must be In Spanish**

Spanish is a threshold language for Humana. Humana provides written communications in both English and Spanish. Non-Threshold languages Humana offers over the phone reading of materials to a member in their language (over 200 languages) once a request is made and this becomes a standing request. Non-English members (excluding Spanish) requesting written materials in their languages are referred to the Concierge Service for Accessibility for outreach and reading of their materials.

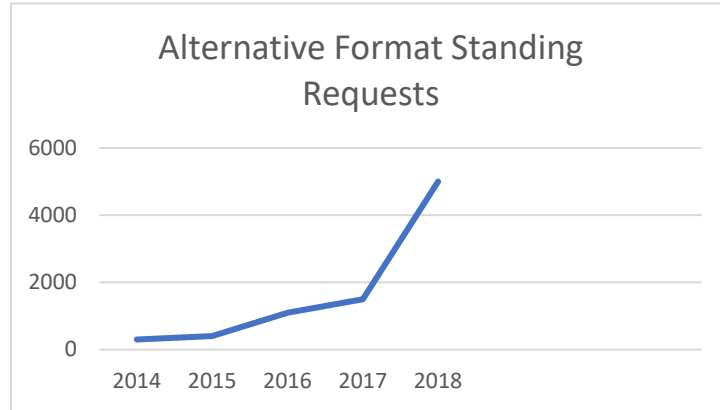
Humana provides Spanish-language services for members through the Humana Health Assessment, the automated information line through the Customer Care Center (which members can use to perform self-service functions such as request new identification cards, get proof of insurance fax, or manage a health savings account), and complete translation of the unsecured Humana.com member, provider, and broker Web portals.

Humana's Spanish Website includes in-language health resources such as the physician Finder tool, PDFs for download, enrollment materials, a translated library with health education materials, and information on Humana's maternity program. Humana also offers member education and customer satisfaction outreach in Spanish, English, and Creole.

### **Alternative Formats**

Humana has focused on continuous improvement of alternative formats and has optimized processes year over year since 2014. In 2018, over 7000 alternative formats to disabled members have been distributed. To meet CMS requirements the regular print version is sent to members based on legal requirements. Alternative formats are sent shortly thereafter. ANOC's in 2018 were sent to members within 14 days of them receiving the printed versions. Humana provides alternative formats in Braille, Large Print, Audio, Accessible PDF, Daisy and Over the Phone Reading.





The number of members requesting alternative formats has increased from 1500 members to almost 3500 members due to system changes within Humana and the self-reporting forms that enable members to self-elect. We anticipate the requirements for Alternative formats to continue to grow due to the population age that we serve and the process changes in requesting alternative formats implemented in latter 2018.

In 2018, Humana has focused on reduction in cost of producing Alternative Formats and sent out over 7000 documents in the format of the members in 2018 and increase of 700% over 2017. We are focused on continuous improvement and increasing the number of documents per members. Given the time-frame in sending alternative formats, to augment the alternative format process we conduct monthly outreach to members to read communication as we focus on improving the alternative format process.

**Element 4: Policies and Procedures §2538.3 & §2538.6**

Humana has a central process and procedure repository where policies and procedures are stored for customer-facing staff (Mentor).

Customer-facing associates have access to member information through our centralized technology platforms; notes are captured with member records and available for subsequent calls.

The policies and procedures in relation to non-English and ADA enrollees are reinforced during specialized training of staff.

**Concierge Service for Accessibility**

Humana implemented the Concierge Service for Accessibility in 2016 (formally Language Assistance and Alternative Formats) to provide “ease of access” to Humana for our disabled members.

Members that are identified as disabled (self-reporting, provider, associate identified) receive monthly phone calls to aid members with vision, hearing, cognitive or physical impairment.

Non-English members that request written communication in their language and it is not a threshold language are added to the Concierge Service for Accessibility for their materials to be read over the phone to the member as a direct result of Federal law.

## **Element 5: Notification of Availability §2538.3(b)(1),(c)(1), §2538.4(b) & §2538.6 (b)(3)**

Humana informs enrollees of the availability of language assistance and alternative formats services at all points of contact at no cost and provides enrollees with information on how to access these services based on Department of Justice/Health and Human Services/CMS/Office of Civil Rights/state departments of insurance guidance for LEP and ADA enrollees.

Potential enrollees are informed that information is available in alternative formats and how they may be accessed.

Humana's enrollee handbook informs enrollees that interpretive services are available to them and how to access these services.

Enrollees may contact Humana requesting plan materials in versions that vary from those routinely mailed to enrollees.

### **Humana Strategy for Meaningful Access**

Humana's strategy is focused on "equality of opportunity" for meaningful access to health care services and activities for all enrollees.

The strategies and tactics defined below are aimed at identifying disparities and developing initiatives to improve health outcomes and care among diverse enrollee populations.

Humana's guidance is based on federal and state laws/regulations, as well as aligned with national CLAS (Culturally and Linguistically Appropriate Services) standards and guidelines (CLAS standards 5-8 are the only federal requirements).

Sample laws and regulations include (but are not limited to): Title VI of the Civil Rights Act of 1964, Section 504/508 of the Rehabilitation Act of 1973, Age Discrimination Act of 1975, Title II and III of the Americans with Disabilities Act (ADA, 1990, 2008 and Department of Justice Final Rule 2010), Executive Order 13166 (2000) (meaningful access of limited English proficiency members), and Section 1557 of the Patient Protection and Affordable Care Act 2010.

### **Model Notice of Discrimination**

As a direct result of Federal law, specifically Section 1557 of the Affordable Care Act the "model notice of discrimination" is included with all communications to the member stating Humana does not discriminate and auxiliary aids are provided at "no cost." This notice also includes information for a member to file a grievance and how to contact the "Office of Civil Rights."

**Non-English Taglines**

As a direct result of Federal law, taglines are included in English, Spanish (threshold language) and Chinese (Frequently Encountered) on all Humana communications and touchpoints (i.e. websites). Also, per Section 1557 a language tagline flyer is included in the top 17 languages in the areas that Humana has products and services. The taglines state the availability of language assistance available at “no cost.”

## Element 6: Staff Training §2538.3(b)(6)

**Humana seeks to hire and develop associates' abilities to meet the cultural and linguistic needs of enrollees and mimic the population that we serve.**

Humana seeks to develop associates' abilities to meet the cultural and linguistic needs of enrollees and has undertaken quality improvement efforts to enhance workforce sensitivity to diversity, disparities and the need to provide appropriate and effective services.

Humana focuses on hiring associate with diverse backgrounds.

Part of this strategy includes a commitment to hiring associates from diverse backgrounds.

Humana collects data on the race and ethnicity of Humana associates through our inclusion and diversity program and will compare these data with the race and ethnicity enrollment data received from state agencies.

The comparison data will be incorporated into Humana's recruiting strategy to help ensure Humana employs staff with backgrounds representative of plan enrollment.

In addition to hiring staff who reflect the diversity of member demographics, Humana recognizes that staff training is a key component in providing culturally competent care.

Humana conducts yearly ethics training with internal staff and specialized training to specific areas that require direct contact or interaction with enrollees.

- Humana trains associates that have routine contact with LEP members according to the following procedures:
  - Existing associates with routine contact with LEP members receive mandatory training through online notification with links to guidelines.
  - New associates are trained through instructor-led instruction.
  - All guidelines are available on Humana's online training source for ongoing use.
- Providing proficiency assessments for associates speaking with enrollees in language other than English.
- Providing specialized language assistance and ADA training as part of job role training.
- Quality interactions are used as a Web-based cross-cultural communication training program for Humana clinical and nonclinical associates.
- Cultural, linguistic and disability customer service training helps ensure covered services are delivered in a culturally competent manner to the target population.
- This is especially important for customer-facing associates with regular contact with non- English and disabled enrollees.

- Training materials include foreign language inbound and outbound call procedures.
- Guidelines contain helpful tips for customer care specialists to assist members who speak different languages, such as information on directing questions to the Voiance interpreter, determining which language is being spoken, determining the language when receiving a web chat, email, and directing foreign language inquiry correspondence.
- Training covers procedures to assist the customer care specialist in distinguishing between calls that require transfer to Humana's internal bilingual Spanish Customer Service area or Voiance.
- Training materials suggest probing questions to ascertain a member's communication preferences
- Training focuses on develop cultural sensitivity to all members
- Training materials outline steps for customer care specialists to update a member's language and alternative format requests.
- Guidelines describe the process for assisting LEP members on obtaining translated vital documents and obtaining translation of non-standard vital documents upon request.
- Guidelines are available to staff in an online format with a link to assist the customer care specialist in obtaining translated vital documents for LEP or disabled members.
- Proficiency assessments for associate speaking with enrollees in language other than English are mandatory.
- Providing ethics and cultural competency training upon hire and yearly for all Humana associates, vendors and providers.
- Examples of training include:
  - Policies and procedures for accessing language assistance and working effectively with LEP enrollees.
  - Training on how to work effectively with in-person and telephonic interpreters and information on cultural differences and diversity within our enrollee population.
  - Use of teletype (TTY), video relay services and remote interpreting services.
  - How to access oral interpretation services and written materials in prevalent languages.
  - How to access materials for blind, limited sight and deaf enrollees.
  - Web-based content and links with a description of Humana's cultural competency program.
  - Resources for recognizing disparities and meeting the cultural and linguistic needs of patients and tools to facilitate clear health communication with patients and improve health literacy.
  - Multilingual health education Web resources
  - Oral interpretation and ADA requirements.

Cultural diversity of our member population and delivery of health care interpretation services:

- Clinical care managers with routine member contact complete cultural competence training to develop and strengthen skills for cross-cultural communication.
- The training includes information on health needs and preferences that vary by culture and describes the importance of cultural competence and effective cross-cultural communication in reducing health care disparities.
- Nonclinical staff with routine member contact receives online guidelines with information regarding the diversity of Humana's membership. The background provides information on the need for language services and an introduction to health care disparities common among Spanish-speaking or other LEP populations. The guidelines also include tips for communicating with cultural sensitivity when interacting with members and providers.
- Training contains summaries of the key components of California Bill 853, its requirements, and assessment of the threshold language in order to provide context to the staff.

**Element 7: Access and Quality §2538.3(b)(2), (d)**

Humana notifies contracted providers of the LAP requirements for provision of language assistance services and informs them of the availability of such services:

- Provider contracts includes a general statement indicating that Humana in-network providers are required to comply with the LAP that is documented in this plan.
- In order to support provider compliance Humana works with providers to ensure they are providing effective communication as a direct result of Federal laws and they are abiding by Section 1557 of the Affordable Care Act and other discrimination laws.
- Humana directs providers via training to the Federal requirements and the Web portal to obtain information for them to ensure they are providing effective communication to all patients.
- Training and review of requirements with providers regarding oral interpretation services (150 languages at minimum) and sign language capabilities (in-person or by video) to ensure providers meet the requirements of Limited English proficiency (LEP) and sign language interpretation (ADA). Humana has partnered with Voiance to make it easy for providers to create accounts and access over the phone interpretation services.
- The notice communicates to providers the need to provide culturally sensitive care to LEP members. Humana Web provider portal contains links with information about culturally sensitive care and available training courses for continuing education credit.
- Humana benchmarks models and proven strategies to improve member experience and clinical outcomes for our non-English-speaking and disabled enrollees.
- A telephonic Humana health assessment in Spanish and a health profile tailored to the member are available within 14 days of completion (information from the assessment is analyzed to determine if the member might benefit from early referral to Humana's clinical programs).
- Spanish versions of member satisfaction surveys are available.
- The 360 Feedback in 2015 is capturing self-reporting from MyHumana regarding language and ADA preferences, as well as map Voiance oral interpretation (over-the-phone) data to member information. The 360 Feedback supports operational aspects of customer service and clinical, as well as statistical analysis to identify trends, aggregate data by population segment, track call resolution and highlight policy/process improvement opportunities or training needs.
- Provider training policies and procedures and training materials are in place to ensure culturally competent services are delivered to enrollees.
- Providers may view a complete copy of Humana's cultural competency plan on Humana's website at [www.humana.com/providers/clinical/resources.aspx](http://www.humana.com/providers/clinical/resources.aspx).
- Providers are to follow Section 1557 of the Affordable Care Act by providing the notice of non-discrimination as required by the Office of Civil Rights (OCR) <https://www.humana.com/provider/support/whats-new/nondiscrimination-notice>.



- Providers also may request a paper copy of Humana’s cultural competency plan at no charge by contacting Humana customer services at 1-800-4HUMANA (1-800-448-6262) or by calling their provider contracting representative.
- Access and quality examples include:
  - Cross-functional/multidepartment collaborations focused on strategic planning and integration of data collection and culturally competent services within health plan operations.
  - Annual submission of Humana market quality improvement program evaluations that include market analysis of enrollees, race/ethnicity and linguistic composition analyses to identify cultural requirements and opportunities to improve services to enrollees.
  - A work-plan documenting initiative operationally to improve the consumer experience of non-English-speaking and ADA enrollees.
  - Participation in the National Health Plan Collaborative, an AHIP-led partnership of commercial, Medicare and Medicaid and Florida Comprehensive health insurance plans, the goals of which are to reduce racial and ethnic health care disparities.
  - Review of customer complaints and grievances for non-English and ADA members.

### **Network Providers and Contractors Cultural Competency**

Effective communication and understanding is important in delivering quality care and service through our network providers and contractors.

Ensuring mutual understanding, however, may be more difficult during a cross-cultural interaction between member and provider.

Some disparities may be attributed to miscommunication between providers and enrollees, language barriers, cultural norms and beliefs and attitudes that determine health-care-seeking behaviors.

In addition to contracting with a culturally diverse network of providers of both genders and prioritizing recruitment of bilingual or multilingual providers, there are other strategies underway to strengthen culturally appropriate communication.

Humana employs the following initiatives to support the provision of culturally and linguistically appropriate care:

- Data collection of languages spoken in provider offices through credentialing and re-credentialing processes.
- Display of languages spoken in provider offices in a Web-based provider directory, available in English and Spanish.

- Provision of Web-based content and links, including a description of Humana's cultural competency program.
- Resources for recognizing disparities and meeting the cultural and linguistic needs of patients, tools to facilitate clear health communication with patients and improve health literacy and nationally recognized disparities literature.

## **Element 8: Stakeholder Consultation §2538.6**

Humana also recognizes the importance of community-level involvement in maintaining effective Language Assistance and Alternative Formats Services program.

Ultimately, Humana's objective is to understand personal contexts of health and encourage action through targeted outreach.

Through these efforts, Humana seeks to deliver appropriate and personalized services to all enrollees, regardless of race, ethnicity, culture, disability or primary language.

Examples include:

- Regular focus groups throughout the country.
- Community meetings (i.e., Florida Comprehensive Plan, Virginia and Illinois Medicaid).
- Ethnographic research (language and disability).

## **Element 9: Emergency and Business Continuity Preparedness §2538.6**

Humana has emergency and business continuity plans that include LEP/ADA language within each customer-facing area to mitigate the effects of a natural disaster or other emergency.

The plans identify how to access an oral interpreter or alternative formats if the normal procedures or processes are not available.

## **Element 10: Digital Information §2538.3**

- Humana ensures all enrollees (current and future) can use language assistance services to access important digital information.
- Humana websites are available in English and Spanish as well as section 508 and WCAG 2.0 compliant and accessible.

## **Element 11: Compliance, Evaluation and Reporting §2538.3(b)(7) & 2538.7**

Humana's Language Assistance and Alternative Formats Services plan is designed to focus on continuous improvement to ensure "equality of opportunity" for meaningful access for all enrollees.

The premise behind compliance, evaluation and reporting is ensuring process and performance management activities target the identification of improvement possibilities, the design of new and revised services or processes, the implementation of innovative solutions aimed at our diverse enrollee populations from a clinical and operational perspective.

Humana's Language Assistance and Alternative Formats Services work plan is available upon request and is posted on the Humana website.

Humana's quality improvement initiatives include:

- Annual submission of Humana market quality improvement program evaluations that include market analysis of membership, race/ethnicity and linguistic composition analyses to identify cultural requirements and opportunities to improve services to specific groups of members.
- Participation in the National Health Plan Collaborative, an AHIP-led partnership of commercial, Medicare and Medicaid and Florida Comprehensive health insurance plans, the goals of which are to reduce racial and ethnic health care disparities.
- Incorporation of ethnically specific health information in Humana Active Outlook magazine, a regular publication for Medicare Advantage, group Medicare and Medicare supplement members, or Humana Family, a regular publication for Medicaid and Florida Comprehensive Plan members.

### **Humana's tactics for collection/reporting of provider data include:**

Data collection of foreign languages spoken in provider offices through credentialing and re-credentialing processes.

Display of foreign languages spoken in provider offices in a Web-based provider directory, available in English and Spanish.

### **Humana's tactics for collection/reporting of member data include:**

Voluntary collection and storage of member self-reported race/ethnicity data through Humana's health risk assessment (yearly).

Language and communication preference form found on MyHumana.com.

Data collection of foreign languages in 200 languages via over the phone interpretation

usage.

Collection of secondary race/ethnicity data from the Centers for Medicare & Medicaid Services (CMS) on Medicare, Medicaid and long-term care enrollees through monthly electronic data files.

Collection of secondary race/ethnicity data from state agencies through electronic data files.

Storage and reporting of race/ethnicity and some language preference data on Medicare and Medicaid and Florida Comprehensive Plan enrollees through the customer interface (CI) system.

Annual state-by-state analysis of American Community Survey and U.S. Census data on race/ethnicity and language spoken at home to determine overall population demographics and language needs.

Use of Geoscape and RAND Corp. geo-coding and surname analysis of race/ethnicity data in combined Office of Management and Budget (OMB) format.

Routine reporting of relevant race, ethnicity and language preference data to the corporate quality improvement committee for review and stakeholder input.

Development of placeholder fields for race/ethnicity and language preference data in clinical profile (clinical member database) for storage and retrieval.

Collection through integrated clinical systems of self-reported race/ethnicity and language preference data in combined OMB format, through enrollee participation in a clinical program (i.e. disease management, case management, personal nurse, etc.).

### **Collection/Reporting of Cultural Preference Data**

Humana collects member's race, ethnicity, language, sex, sex orientation, disability and alternative format preference data on an on-going basis based on Federal and State regulation requirements.

Language is collected in at minimum 150 languages and alternative format request are set up in a "single request" process.

Alternative formats are available in Braille, Large Print (Print or PDF), Audio-MPG, Audio-WAV, Audio-Daisy (Audio files are available via USB, CD, Daisy or Cassette), Screen Reader PDF or Orally over the Phone.

Humana utilizes the collected cultural data to identifying variations in the quality of care provided to different groups, developing and implementing effective prevention and treatment strategies, training and facilitating the provision of culturally and linguistically appropriate health care.

Collecting data on enrollees' language preferences helps determine the need to translate materials based on the populations served, assess the need for interpreter services and identify opportunities for culturally appropriate interventions.

Health care providers play a significant role in reducing disparities and delivering appropriate services to all enrollees, regardless of race, ethnicity, culture and primary language.

Humana network providers must abide by Federal and State regulations regarding Over the Phone interpretation at minimum 150 languages and sign language interpretation requirements either in-person or via Video Remote Interpretation, if the provider is not compliant Humana will provide interpretation services while the provider becomes compliant.

Humana seeks to maintain a provider network capable of meeting the cultural and linguistic needs of a diverse population.

The Humana Concierge Service for Accessibility monitors disabled, Non-English and other enrollees that require additional assistance in accessing Humana.

This includes providing direct videophone capabilities with deaf members, scheduling of interpretation, assistance with appointments, reading of the website or Humana communication for blind enrollees.

### **Enrollee Care Plans**

Cultural considerations play a key role in the development of enrollee care plans and in care management.

Humana also works to develop individualized care plans to meet enrollees' unique needs, such as transportation and accommodation for enrollees with developmental and cognitive disabilities, as well as the provision of services for homebound enrollees.

Humana case managers collect data on member language preferences, social and cultural history and personal health preferences.

The data are used to develop individualized care plans. Humana's case management program has detailed policies and procedures outlining the role that cultural, linguistic and disability considerations play in developing enrollee care plans.

### **Analysis**

- Spanish continues to be the threshold language in our markets that we serve. Therefore focus is on-going optimization of our Spanish speaking agents or clinical staff to ensure our staff mimics the populations we serve.

- Reviewing Provider offices for accessible tables and scales continues to be a focus ensuring that disabled member are only assigned to provider offices that are accessible.
- Alternative Formats increase in 2018 is not all encompassing and we are aware there is continued improvement required in this area to ensure all critical documents are sent to the member in 2019 in the format of their choice as a direct result of Federal law: Title II of the Americans with Disabilities Act (ADA) and Section 1557 of the Affordable Care Act.
- An organization-wide effort is underway to improve Spanish-language capabilities (Multicultural Strategic Enterprise Effort).
- Language proficiency assessments are conducted in English and any language a staff member communicates with members. Humana utilizes the Interagency Language Rating Scale; a score of 3 is required in all languages.

### **Opportunities/Barriers Identified**

- Opportunities still exist to improve alternative format delivery process in 2018 and decrease time to deliver to members and increase the number of documents to members. The issue exist with the CMS process (i.e., once CMS approves communication in English – to be distributed – conversion of document to Braille takes roughly 2 extra weeks - since Braille cannot be mass produced – ADA members receive print communication and then 4 to 6 weeks later the same information in Braille).
- Opportunities continue to exist moving deaf members to video remote interpretations but based on Title II of the American with Disabilities Act the requirement for effective communication is the “choice” of the member and many deaf members still prefer in-person sign language interpreters even though there is a shortage based on a moratorium by RID (certification organization of sign language interpreters) regarding new sign language interpreter certification.
- Opportunities exist to continuously educate providers regarding ADA requirements and the requirement for deaf members to have “in person sign language interpreters” or “video interpretation” at every appointment.
- Opportunities exist to audit providers to ensure they are abiding by Section 1557 of the Affordable Care Act and distributing model notice of discrimination to their patients that they provide auxiliary aids. It is the responsibility of the provider to abide by Federal laws and Section 1557 is one that providers struggle with.