



Language Assistance Program

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LANGUAGE ASSISTANCE PROGRAM

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LANGUAGE ASSISTANCE PROGRAM

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 employer groups, government-sponsored plans, and individuals.

The Humana Language Assistance Plan (LAP) describes the structure, processes, and standards used to provide **language assistance, at no cost**, services 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 written materials of vital documents based on threshold languages.

The purpose of this document is to describe Humana's Language Assistance Program (LAP), including the comprehensive processes and standards that apply to Humana's assessment of member's linguistic needs, provision of language assistance services, staff training, and compliance monitoring. This written plan for the LAP documents the processes and standards in place currently and benchmarks established to ensure continuous improvement of our language assistance services on an ongoing basis based on regulatory requirements issued by the Department of Justice (DOJ), Health and Human Services (HHS), Centers for Medicare and Medicaid (CMS), Office of Civil Rights (OCR), Department of Labor (DOL), Federal Drug Administration (FDA), National Institute of Health (NIH) and individual state requirements where Humana conducts business (i.e. California).

LANGUAGE ASSISTANCE PROGRAM: §2538.3(a)

Purpose

The purpose of this document is to describe Humana's Language Assistance Program, including the comprehensive processes and standards that apply to Humana's assessment of member's linguistic needs, provision of language assistance services, staff training, and compliance monitoring. Humana's Language Assistance Program has been drafted to conform to the California Department of Insurance regulatory requirements established by Sections 2538.1 – 2538.8.

Humana is committed to providing language assistance in order to improve programs and services for all members. In 2015, Humana has recently launched national efforts to improve language access for all members by implementing a self-reporting form under MyHumana where members can self-report 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 and regulatory compliance.

The purpose of these services is to provide maximum language accessibility to Humana's LEP members. Humana follows the Health and Human Services Language Assistance Plan model.

The key elements addressed are:

- Element 1: Assess Needs & Capacity
- Element 2: Oral Language Assistance Services
- Element 3: Written Translation of Vital Documents
- Element 4: Policies and Procedures
- Element 5: Notification of Availability
- Element 6: Staff Training
- Element 7: Access & 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 Language Assistance and Alternative Format Services is a centralized platform that is enterprise-wide and is accountable for the provision of effective and efficient language assistance services and implementation of this plan through all entities of Humana. The policies documented in this LAP apply to the following lines of business:

• EAP Plan	• Small Group Medical,	• Medicare Plans
• Work Life Benefits	• Small & Large Group Dental,	• Medicaid Plans
• Affordable Care Plans	• Pharmacy	• State Mandated Plans
• Providers (owned/delegated)	• Acquisitions	• Plus any Humana business current and future

Responsible Oversight

Humana Language Assistance & Alternative Format Services 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 successful

A variety of measurement tools will be used in combination with self-reporting tools, customer service capturing of language and disability, member satisfaction, focus groups and provider satisfaction surveys will be a key indicator of Humana’s success.

Best Practices

Based on competitive analysis (industry and other benchmark industries) Humana strives to create best practices based on continuous improvement by establishing an LAP for Humana enterprise, creating tools to “make it easy” to implement, establishing proficiency requirements for effective communication with members and interpreter services. It is important to monitor and evaluate as well as provide oversight to effective interpreter and language services.

Element Summary

ELEMENT 1	ASSESSMENT: NEEDS AND CAPACITY
A.	Regularly identify and assess the language assistance needs of its current and potential customers
B.	Assess agency and capacity to meet these needs according to the elements of this plan
C.	Ensure that workforce reflects the diversity of plan's membership

ELEMENT 2	ORAL LANGUAGE ASSISTANCE SERVICES
A.	Provide oral language assistance in both face-to-face and phone encounters that address needs identified in Element 1
B.	Establish a point of contact for individuals with LEP such as a phone number
C.	Provide oral language assistance to ensure meaningful access to participate fully in programs, services and benefits
D.	Provide language assistance through a variety of means including bilingual staff, contract interpreters and community volunteer interpreters
E.	Ensure interpreters' quality, practice ethics and confidentiality

ELEMENT 3	WRITTEN TRANSLATIONS
A.	Identify, translate and make accessible in various formats including print and electronic media, vital documents in languages other than English
B.	Determine what constitutes vital documents such as applications, and implement a translation strategy
C.	Meet plain language and literacy standards so materials are easily understood by target audiences
D.	Use the services of qualified, professional translators

ELEMENT 4	POLICIES AND PROCEDURES
A.	Implement and regularly update policies and procedures that ensure individuals with LEP have meaningful access to programs and activities
B.	Establish and maintain an infrastructure to implement and improve language assistance services
C.	Results of the assessment from Element 1 should be used to inform the development of policies and procedures (P&P)
D.	Develop P&P for receiving and addressing language assistance concerns or complaints from customers with LEP to improve services

ELEMENT 5	NOTIFICATION OF THE AVAILABILITY OF LANGUAGE ASSISTANCE AT NO COST
A.	In accordance with plan needs and capacity and in plain language, plan will inform individuals with LEP that language assistance is available at no cost.
B.	To ensure meaningful access to plan programs, need to notify

	customers with LEP about the availability of language assistance at no cost
C.	Develop and display appropriate taglines on vital documents, web pages, and outreach materials notifying audiences that language assistance is available at no cost and how it can be obtained

ELEMENT 6	STAFF TRAINING
A.	Commit resources and provide employee training as necessary to ensure staff understands and implements the policies and procedures
B.	Maintain an infrastructure to help staff implement and improve language assistance services
C.	All plan staff should be notified that their plan provides language assistance and informed on how to access and utilize oral and written language assistance services, how to work with interpreters, how to convey complex information using plain language, and how to communicate effectively with Individuals with LEP

ELEMENT 7	ASSESSING ACCESSIBILITY AND QUALITY
A.	Regularly assess accessibility, accountability, and quality of language assistance activities
B.	Create a LEP quality control plan
C.	Develop translation quality standard
D.	Translate and test documents for LEP accuracy and to ensure it meets the needs of the target population
E.	Ensure materials will adhere to accesibility guidelines set for in the Rehabilitation Act o 1973, as amended (29 U.S.C\$ 794d)

ELEMENT 8	STAKEHOLDER CONSULTATION
A.	Consult with partners and stakeholders on identifying LEP needs, strategies and methods to evaluate progress of the LAP to ensure that LEP persons are afforded meaningful access
B.	Document stakeholder contact information ton ensure LEP person are afforded meaningful access - partner meetings, conferences, town halls
C.	Use studies, reports or other relevant material produced by stakeholders as forms of stakeholder input
D.	Implement mechanisms that record stakeholder input
E.	Complete LEP process improvement analysis to enhance existing LEP services
F.	Post Strategic LAP updates and resources on te internet and intranet in multiple languages

ELEMENT 9	EMERGENCY PREPAREDNESS
A.	Mitigate the effects of a natural disaster or other emergency to implement strategic measures to ensure access to information, benefits and services
B.	Outline steps to measure emergency preparedness status within the scope of emergency service processes currently in place for LEP activities

C.	Outline steps to ensure emergency preparedness information, benefits, and services are in place in the event of a natural disaster
D.	Outline steps to ensure that during emergency individuals are not impeded due to LEP status

ELEMENT 10	DIGITAL INFORMATION
A.	Ensure that individuals with LEP can use language assistance services to access important digital program information
B.	Place links on the English language website to documents that are available for viewing in languages other than English
C.	Use and promote resources on www.lep.gov by providing links to the LEP.gov website on CMS websites
D.	Explore opportunities to leverage social media to increase awareness and utilization by individuals with LEP of plan programs, activities, language assistance services, and products available in non-English languages
E.	Ensure all electronic technology is compliant with Section 508 of the 1973 Rehabilitation Act

ELEMENT 11	COMPLIANCE EVALUATION, MEASUREMENTS AND REPORTING
A.	Periodically evaluate the effectiveness of the LAP and confirming compliance with regulations related to language access
B.	Measure and monitor LAP, including delegated programs and make modifications to ensure compliance
C.	Compliance reviews will include Title VI and other civil rights laws

Glossary of Terms and Acronyms

For the purposes of this document and the plan it describes, the following definitions apply:

Term	Definition
Direct “In-Language” Communication	Monolingual communication in a language other than English between a multilingual staff and an LEP person (e.g., Korean to Korean).
Effective Communication	Communication sufficient to provide the LEP individual with substantially the same level of access to services received by individuals who are not LEP. For example, staff must take reasonable steps to ensure communication with an LEP individual is as effective as communications with others when providing similar programs and services.
Language Assistance Services	Oral and written language services needed to assist LEP individuals to communicate effectively with staff, and to provide LEP individuals with meaningful access to, and an equal opportunity to participate fully in, the services, activities, or other programs administered by the Department – Provided “free” to members.
Language Assistance Program (LAP)	Humana’s plan to provide free language assistance services to limited English proficient members.
Limited English proficient (LEP)	Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. LEP individuals may be competent in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing).
Meaningful Access	Language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual.
Member	General term synonymous definition within the insurance industry meaning <i>insured person</i> or <i>enrollee</i> .
Multilingual staff or employee	A staff person or employee who has demonstrated proficiency in English and reading, writing, speaking, or understanding at least one other language as authorized by his or her component. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed or inferior as compared to programs or activities provided to English proficient individuals.

Terminology	Definition
Over the Phone Interpretation	The act of listening and understanding a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.
Oral Interpretation or "Sight Interpretation"	The process of listening, understanding, and analyzing a spoken or written message in one language and orally re-expressing that message faithfully, accurately, and objectively in another spoken language, taking the cultural and social context into account and not changing the meaning of the communication.
Primary Language "Target"	An individual's primary language is the language in which an individual most effectively communicates.
Points of contact (POC)	Instances in which a member accesses the services covered under a health insurer's policy or certificate, including administrative and clinical services, telephonic, and in-person contacts where the need for language assistance may be reasonably anticipated
Program or Activity	The term "program or activity" and the term "program" mean all of the operations of the Department.
Qualified Translator or Interpreter	An in-house or contracted translator or interpreter who has demonstrated his or her competence to interpret or translate through certification or is authorized to do so by contract with company.
Threshold language	A language spoken by a minimum number or percentage of members, as described in the regulations
Translation (Written)	The conversion of a written text in one language (source language) into a written text in a second language (target language) corresponding to and equivalent in meaning to the text in the first language
Vital documents	Paper or electronic written material that contains information that is critical for accessing a recipient's program or activities, or is required by law to Limited English proficient members. Vital documents are those communications that create consequences or impact the health of a member. Vital documents include but are not limited to informational materials, letters, notices, applications, and forms

Element 1: Assess Needs & Capacity

Humana utilizes Geoscape currently which is a compilation of U.S. Census, ACS and County Demographics. HHS/CMS, NIH and State DOI's (i.e. California) provide guidance yearly in regard to counties showing population shifts and language thresholds. Currently Humana provides Oral Interpretation in over 200 languages and Video Interpretation in 24 languages. Written translations are based on "thresholds" (i.e. Spanish) and other languages recommended by CMS (i.e. Mandarin).

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 collection of population data enables our ability to monitor and match requirements and needs (see Appendix A).

Four-Factor Analysis "vital" communications:

- (1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
- (2) the frequency with which LEP individuals come in contact with the program;
- (3) the nature and importance of the program, activity, or service provided by the program to people's lives; and
- (4) the resources available to the grantee/recipient and costs. As indicated above, DOI's guidance is intended to strike a balance between ensuring LEP persons have meaningful access to critical services, benefits, and information while not imposing an undue burden on small business, small local governments, or small nonprofits.

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

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

Safe Harbor

Safe Harbor is a Department of Justice recommendation that ensure with greater certainty that Humana's meets the language assistance requirements for meaningful access that will provide strong evidence of guidance in regard to LEP populations for written materials.

- (1) 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.
- (2) If there are fewer than 50 persons in a language group that reaches the five-percent trigger than does not translate "vital" written materials but provides written notice in the primary language of the right to receive competent oral interpretation of those written materials, free of cost."
- (3) If population is less than 5% or a 1000 members than a plan in place to provide "oral" interpretation (phone, video or in-person) for free by language.

These 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 particular language, a LEP person speaking that language should be given appropriate oral interpretation of important information.

Survey of Linguistic Needs: §2538.3(b)(3) & §2538.4(a),(b)

Per Federal requirements, linguistic needs are met via collection of data from the employer. Humana partners with each employer to ensure the needs of the member/enrollee are met. Humana as a portal for members to review their claims and program information, a self-reporting form is available for members to self-register their language preference, communication preference and if they have a disability. Based on the self-reporting forms for those members in California the results for language and race information is below:

Preferred written language	Rate
English	91.3%
Spanish	6.3%
Other	2.4%
Preferred spoken language	Rate
English	90.5%
Spanish	6.9%
Other	2.6%
Race/ethnicity	Rate
Caucasian / White	90.5%
Hispanic / Latino	6.9%
Asian	2.6%
African American / Black	3.4%
Native American / Alaska Native	0.7%
Native Hawaiian / Other Pacific Islander	0.6%
Other	3.0%

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, as more than 5% of membership indicated a preference for written materials in the Spanish language. Therefore, Humana prepares “vital” documents in English and Spanish as a threshold language for the Language Assistance Program. Humana employs the use of neutral Spanish and recognizes the *Real Academia Española Dictionary (RAE)* as the ultimate arbiter for Spanish language matters.

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

Measurements

- (1) Proportion of LEP person from a language group “served” or “encountered” in the eligible service population (i.e. County, State...).
 - a. The greater the number – the increased language services are needed
 - b. How do we determine populations we "serve" to meet 5% threshold? (Medicare & Medicaid)
 - c. How do we determine populations we "serve" to meet 10% threshold? (ACA)
 - d. How do we determine "current vs potential" thresholds

- (2) Percent of LEP encounters to determine where meaningful access is required (based on prior experience, member data, OPI data and retention data).
 - a. Determine breadth and scope of language services needed.
 - b. Determine why LEP members leave
- (3) Frequency of contact based on customer touch points that affect the members health or create consequences
 - a. Over the Phone Interpretation analysis
 - b. Primary usage versus secondary usage (Internal staffing mix)
- (4) Percent of vital communications (those communications that create consequences or negative impact member's health).
 - a. Matrix identifying vital documents (denial, delay of access to benefits, services, warning, or information)
 - b. Cross-referenced by vital documents – written translations by language
- (5) Percent of mix of language assistance services
 - a. Over the Phone Interpretation Percentage
 - b. Materials available for download percentage
 - c. Written materials translated percentage
 - d. Internal bilingual staff on customer facing touch points
 - e. Percent of qualified translators
 - f. Percent of qualified interpreters

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

For oral language assistance services internal staff is the primary source for meeting LEP members needs and the secondary source is an outside vendor in over 200 languages (Voiance).

Plans are required to provide interpretation services for any language requested, by an enrollee, 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.

Humana provides individual access to qualified oral interpretation or in-language services to all LEP members according to standards of quality and timeliness at all customer touch-points, as described below (see Appendix C for flow chart):

- a) **Inbound phone call (in-language):** Humana's Automated Information Line (AIL) is available in English and Spanish. Humana's Customer Care Center also has a dedicated Spanish line, staffed by bilingual (English- and Spanish-speaking) associates, to assist Spanish-speaking members with requests beyond those that are available through the AIL.
- b) **Inbound phone call (interpretation):** Humana uses a vendor (Voiance Services) to assist LEP callers through over-the-phone interpretation when bilingual Spanish-

speaking Humana associates are not available to provide in-language service.

- c) **Outbound phone call (interpretation):** Prior to initiating an outbound call to an LEP member, the customer care specialists can conference in Voiance in order to obtain an interpreter if a bilingual specialist is unavailable to handle the call.
- d) **Site of enrollment:** If an agent/enrollment representative needs assistance with interpretation of enrollment material for potential member enrollment, they can call a Humana customer care specialist in order to be connected to the Voiance in a timely fashion.

Humana adheres to the following processes and standards to provide qualified Spanish language services to Spanish-speaking members free of charge:

- e) 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 member identification card.
- f) When a member first calls Humana's Customer Care Center, the member has the option of proceeding in Spanish. The LEP member is then 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 area. Through the AIL, Spanish-speaking members can perform self-service functions such as request new identification cards, get proof of insurance fax, or make a health savings account (HSA) withdrawal.
- g) If the member opts out of the AIL or is automatically opted out, the call is routed to a bilingual Humana customer care specialist.
- h) Bilingual customer care specialists undergo training in appropriate terminology and ethics and the same job-related training as English-speaking customer care specialists. Spanish language proficiency is verified during the new-hire interview.
- i) 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.
- j) 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. 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 procedure.
- k) 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 from a bilingual customer care specialist. If an LEP member requires interpretation of a plan-produced document into a language other than Spanish, that member can contact the Customer Care Center obtain over-the-phone language interpretation, according to procedure.
- l) Associates who speak with members in another language are assessed using the Inter-agency Language Rating Scale a government developed standard assessment tool. Humana standard and based on competitor benchmarks is a score of 3 (General proficiency). The assessment is provided by an external vendor (Alta).

Humana adheres to the following processes and standards to provide qualified over-the-phone interpretation services to LEP members free of charge in the member's preferred language:

- m) Humana uses over-the-phone language interpretation to provide interpretation services to LEP members at all Points of Contact (POC).
- n) Humana informs members of their rights to access interpretation services in their preferred language at all POC.
- o) Humana's Web provider portal includes a notice to advise providers how to access interpretation services for LEP members. Dental providers are informed of the notice via an end-of-year mailing, which directs providers to access the Web content. The notice directs providers and their staff to call the Customer Care Center for connection to the Voiance when a Humana member is in need of interpretation services.
- p) Humana contracts with a vendor, Voiance Services, 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 all Spanish calls.
- q) 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 telephonic interpretation services from the Voiance, according to procedure. Among calls that are transferred to the Voiance, 90% are answered in 30 seconds or less. During the call, the Voiance interpreter listens to the LEP member and the Humana customer care specialist, analyzes the messages, and accurately conveys its original meaning to the participants.
- r) Humana discourages LEP members from using family members, friends, or minors as interpreters:
 - i. If an LEP member requests the use of a family member or friend as an interpreter, Humana offers the member the use of a qualified interpreter through the Voiance.
 - ii. If the member refuses the use of a professional interpreter during contact with the Customer Care Center, Humana allows the use of the requested individual as the designated interpreter if the individual will not compromise the effectiveness of the service or violate the member's confidentiality. The customer care specialist documents this request in the system.

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

- s) Voiance Services' education and training of staff meet and exceed the standards of the California Healthcare Interpreters Association and the National Council on Interpreting in Healthcare.
 - i. Passing of the Interagency Language Rating Scale – 4+ - Business Professional
 - ii. 120 hours of in-house training for interpreters "In language"
 - iii. 2 weeks of supervisor observed calls

- iv. Quality audits (in person and listening) – every week
- v. Zero tolerance for mis-interpretation or violating interpretation rules
- t) Voiance Services professionally trains, tests, and certifies its interpreters with a rigorous testing process to validate:
 - i. Competency in both source and target language;
 - ii. General knowledge and intimate familiarity with both cultures;
 - iii. Ability to express thoughts clearly and concisely in both languages;
 - iv. General knowledge of the subject to be interpreted;
- u) Voiance interpreters receive messages in the source language and repeat it in the target language with cultural sensitivity, rather than providing a literal interpretation.
- v) Voiance interpreters have a fundamental knowledge in both languages of health care 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 (See Appendix D).

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

- w) Humana monitors the availability of interpretation services in the threshold language(s) that are requested on behalf of the LEP membership at all points of contact:
 - i. Humana customer touch-points operate from 8:00 am to 6:00pm CST, Monday-Friday. But Voiance interpreter services are available 24/7 if a customer touch-point requires interpreter services (Humana at Home Nursing Assistance Line).
 - ii. Humana Spanish-speaking teams are available for in-language service from 8:00 am to 6:00 pm CST, Monday – Friday.
 - iii. Humana's call quality assurance teams monitor whether calls requiring interpretation are transferred correctly to the Voiance.
 - iv. Foreign language calls are held to the same service level standards as English calls: 80% of calls answered within 20 seconds.
- x) Humana monitors the quality of interpretation services in the threshold language(s) at all points of contact:
 - i. 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 the Voiance are monitored in the same way as English calls.
 - ii. 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, in order to identify coaching opportunities or need for guideline updates.
 - iii. Foreign language calls are held to the same quality service standards as English calls. Generally, call quality standards are the following:
 - Delivery of accurate, complete, and relevant information;

- Resolution of the member’s issue on first contact;
 - 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;
 - Anticipation of the member’s needs.
- y) Humana monitors the utilization of interpretation and bilingual services on behalf of the LEP membership requesting assistance in the threshold language(s) at all points of contact:
- i. The Customer Care Center monitors and reports the number of encounters that are transferred to the Spanish-speaking team and the Voiance.
 - ii. Codes in the call handling systems indicate the instances when language assistance is used. The Customer Care Center reports regularly on these inquiry drivers.
 - iii. Customer care specialists receive training on the proper coding process to capture and document these encounters.
- z) If problems are identified, Humana makes modifications as necessary and documents corrective actions.
- Testing and attestation of internal and external translators to confirm proficiency and ethics of staff.
 - Oral interpretation services offered in more than 200 languages (over the phone), plus video remote interpretation (VRI) in 27 languages, including American Sign Language.
 - 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 create an easy process for providers to meet the government regulations. Access is available at: <https://www.voiance.com/services/AccountSignUp/ServiceAgreement.aspx?q=d0db2690-d029-4197-8eee-27e292848969>.
 - Interagency language proficiency assessments for associates who speak with enrollees in a language other than English (i.e., Spanish).
 - Examples include:
 - VRI – American Sign Language for Deaf enrollees with smartphones is available 24/7 (i.e., pharmacy visit).
 - In-person sign language interpreter provided for Humana enrollees.
 - Linguistically trained oral interpreters for blind enrollees (trained to speak with blind enrollees).
 - Oral interpretation of “vital” documents upon request (i.e., non-English enrollees, blind and hard-to-see).

Humana utilizes the Interagency Language Rating Assessment (ILR) as the standard methodology to ensure proficiency in the language of the member and to ensure that members are not negatively impacted by a Humana associate who is not proficient in the language of the member. The standard score all associates must speak in the language of the member is a “3” (General Proficiency). Those associates that score below 3 must utilize an interpreter, if they

are found not proficient. Humana focuses on ensuring our associates mimicking the population we serve by ensuring a mix of associates that is culturally and linguistically diverse.

Measurements

(1) Interpretation Metrics

- a. Cycle Time from moment that member requests Interpreter to interpreter on the phone – under 2 minutes.
- b. Cycle Time from contact of Language Company selection of language to an interpreter on line – under 35 seconds (Spanish – under 20 seconds)
- c. # of Spanish calls answered internally versus using Interpreter service

Element 3: WRITTEN TRANSLATION: §2538.3(b)(4) & §2538.5, Section 1367.04(b)(1)(A)(iii)

Humana translates all vital documents into the threshold language(s) according to written translation standards of quality and accuracy, as required by law. Humana's processes and standards for translating vital documents are as follows:

- a) Humana's threshold language in the state of California has been identified as Spanish
- b) Translation of vital information into Spanish is performed according to written translation standards of quality, accuracy and timeliness including, but not limited to:
 - o Applications
 - o HIPAA notice of privacy practices
 - o Consent/authorization forms
 - o Benefit summary matrix
 - o Enrollment kits
 - o Appeal/grievance responses
 - o Explanations of benefits
 - o Clinical review responses
 - o Eligibility/participation letters
 - o Requests for additional information
 - o Termination notices
- c) Humana's translation department has a defined intake process to provide efficient and effective delivery of timely and accurate translation services:
 - i. When the need for translation of a vital document is identified, the document owner submits a request to the Translation department by email, including a description, special instructions, and due date.
 - ii. The department has a standard turnaround time but can accommodate rushed requests if needed.
- d) For standard vital documents and forms, Humana provides the original document in English with the Department-approved written notice of the availability of interpretation and translation services in the threshold language(s).
- e) Vital documents are available in the threshold language(s) and can be delivered to the member upon request. Humana archives standard vital documents that are translated into the threshold language(s) according to corporate, state, or other applicable record retention requirements.
- f) For vital documents that contain member-specific information, Humana provides the original document in English with the Department-approved written notice of the availability of interpretation and translation services in the threshold language(s).
- g) If a member requests translation of a non-standard vital document into the threshold language(s), Humana translates and delivers it to the member within a 21-day time

period beginning upon receipt of the request.

- h) If a member requests translation of a vital document into the threshold language and the document requires the member to take action within a certain period of time, that time period does not begin to elapse until Humana provides the member with a translated version of the document, according to the standards found in this LAP plan. In the case of appeals that require expedited review and response, Humana provides the notice of the availability of oral interpretation services.
- i) Provider Directories identify language spoken by the provider.
- j) Customer Care focuses on aligning members to a provider that culturally meets their needs (i.e. Language, distance from residence, Accessibility).

Humana adheres to the following standards to maintain quality and accuracy in written translation:

- k) Humana's procedure for translation verifies that foreign-language written translations meet the same standards of accuracy and timeliness to which English communications are held.
- l) Humana translation staff follow a rigorous process to translate, edit, and proofread written communications. Humana's Translation department proofreads all translated content received from vendors, thereby conducting a complete audit of externally translated materials.
- m) Humana's Translation department issues a Letter of Attestation for internally translated documents that will be filed with the departments of insurance. In the case of documents translated externally, Humana receives a notarized Certificate of Accuracy from the professional translation agency (see Appendix B). Humana maintains ultimate responsibility for the quality of external translations.
- n) Humana recognizes the *Real Academia Española Dictionary (RAE)* as the ultimate arbiter for Spanish language matters. If a word in question does not appear in the *RAE*, or if its definition is not congruous with the intended meaning of the English term, Humana does not use it for official communications. Humana also consults the *Diccionario Mosby Inglés-Español Español-Inglés de Medicina* (ISBN 84-8174-541-3) to verify medical neologisms and health-related terminology that may not be present in the *RAE*. Humana uses Web-based resources such as the National Institute of Health's MedLine Plus and other reputable sources of medical information and terminology in the Spanish language, as generally accepted in the United States. For grammatical clarifications, Humana defers to *Gramática de la Lengua Castellana* by Andrés Bello (ISBN 84-7166-562-X).
- o) In communications to members, Humana uses a standard eighth grade reading level.
- p) Humana provides a standard glossary to vendors in order to maintain consistency of terms.

Humana adheres to the following standards to confirm ethics and proficiency of internal translation staff:

- q) Humana maintains high ethical standards in the conduct of its business. On an annual basis, all Humana associates are required to complete training on the *Principles of*

Business Ethics. The principles are an important part of Humana's Corporate Compliance Plan, which is overseen by Humana's Ethics Office. While the provisions set forth in the content do not cover every possible situation that may arise, Humana associates are expected to comply with the spirit of these principles.

- r) Humana maintains an active membership in the American Translators Association and subscribes to its *Code of Professional Conduct and Business Practices*.
- s) Humana adheres to the following guidelines when hiring translation staff, in order to verify language proficiency:
 - i. Humana administers a variety of tests to measure each applicant's skill set, attention to detail, speed, knowledge of terminology, and to ascertain the candidate's knowledge of both languages. The results, combined with the applicant's background and experience, indicate whether the person is qualified. The tests include:
 - Spanish reading comprehension test,
 - English reading comprehension test,
 - Proofreading of a marketing brochure in Spanish,
 - Spanish verbal segment during the interview process.
 - ii. Native speakers are desirable but not required.
 - iii. Translators are expected to have a minimum of five years of professional translation experience. Exceptions can be made for translators with three to four years of experience, if accompanied by a degree in Spanish and excellent references.
 - iv. A track record of service in the health care industry is desirable.
 - v. Humana seeks translators with accreditations from organizations such as the American Translators Association or the National Association of Judiciary Interpreters and Translators, or a college degree in Translation.
 - vi. Humana promotes continuing education, which encourages translators to keep up with current issues in translation, such as localization, technology, and industry trends.

Humana holds the following expectations of translation vendors in order to maintain ethics and proficiency among vendor staff. Humana audits all work submitted by vendors for quality assurance.

- t) Humana collaborates with professional translation agencies certified by Industry Associations. All vendors providing translation services are required to enter into a HIPAA Business Associates Agreement (BAA) with Humana. Under the terms of the BAA, Humana and the vendor intend to protect the privacy and provide for the security of Protected Health Information that is disclosed to the vendor.
- u) Contracts with vendors allow Humana to request vendor staff credentials at any time.
- v) All vendors providing translation are expected to confirm the proficiency and quality of their translation staff, which may include adhering to the following guidelines:

- i. Vendors are expected to hire translators with college degrees, experience, professional credentials, language accreditation, trade association membership, and references.
- ii. Vendors should perform rigorous testing among staff to validate that their translators meet quality standards.
- iii. Translators should possess an advanced ability in the source language.
- iv. Translators should have solid computer and translation tool knowledge and strong writing skills.
- v. Vendors should maintain a code of ethics for translators.

In order to monitor the LAP and validate compliance, Humana adheres to the following processes and standards:

- w) The business owners of each standard vital document monitor the availability of translated standard vital documents in the threshold language(s) that are requested on behalf of the LEP membership:
 - i. Marketing maintains an online inventory of standard vital documents, which are available for on-demand access and ordering.
 - ii. When Marketing produces a new vital document in English, it is also translated into Spanish. Both versions are stored online.
- x) Humana's translation department monitors the quality of all translated vital documents through a complete audit, on an incoming basis.
- y) Humana's translation department monitors the usage of translation services on behalf of LEP members requesting written assistance in the threshold language(s). Translation monitors usage by recording requests for translation on a monthly basis. These records allow the department to report metrics on the usage of translation. Reporting is available as needed for evaluation of Humana's language assistance services.
- z) If problems are identified, the Translation department makes modifications as necessary and documents corrective actions.

Element 4: Policies and Procedures

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 used during training and reviewed annually.

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

Humana informs members of the availability of language assistance services at all POC at no charge and provides members with information on how to access these services:

- a) Notifications are included in enrollment kits and attached to all standard and non-standard vital documents (see Appendix E for a copy of the member notice).
- b) Member identification cards list a toll-free number to access Humana's Customer Care Center. At the beginning of the call, Spanish-speaking members can elect to proceed with the call in Spanish. If an LEP member requires interpretation in a language other than Spanish, he/she can opt out of the AIL to reach a customer care specialist who will conference in the Voiance for interpretation services.
- c) 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.
- d) Potential enrollees are informed that information is available in alternative formats and how they may be accessed.
- e) 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.

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

Humana trains associates that have routine contact with LEP members according to the following procedures:

- a) Existing associates with routine contact with LEP members receive mandatory training through online notification with links to guidelines.
- b) New associates are trained through instructor-led instruction.
- c) All guidelines are available on Humana's online training source for ongoing use.

Staff access online guidelines in an electronic format for guidance and instruction on the components of Humana's language services. The training contains information on the following:

- d) Components of the California Language Assistance Program:
 - i. Guidelines offer staff a summary of the key components of the LAP.
 - ii. Staff are provided with documentation that guides users on accessing the resources that are available for Humana staff to fulfill the LAP, such as guidelines for obtaining interpretation and translation services, in order to work effectively with LEP members.
- e) The services available to assist LEP members:

- i. 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 or email, and directing foreign language inquiry correspondence.
 - ii. 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 and the Voiance.
 - iii. Training materials suggest probing questions to ascertain a member's communication preferences.
 - iv. Training materials outline steps for customer care specialists to update a member's language preference in the system.
 - v. Guidelines describe the process for assisting LEP members in 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 members. To request translation of non-standard vital documents, staff follow the translation request process by submitting an email with the document to be translated and accompanying information.
- f) Cultural diversity of our member population and delivery of health care interpretation services:
- i. Clinical care managers with routine member contact complete cultural competence training in order 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.
 - ii. Nonclinical staff with routine member contact receive 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 populations. The guidelines also include tips for communicating with cultural sensitivity when interacting with members and providers.
- g) Training contains summaries of the key components of California Senate Bill 853, its requirements, and assessment of the threshold language in order to provide context to staff.
- Humana seeks to develop associates' abilities to meet the cultural and linguistic needs of enrollees by:
 - Hiring associates from diverse backgrounds.
 - Providing proficiency assessments for associates speaking with enrollees in language other than English.
 - Providing ethics and cultural competency training upon hire and as an annual requirement for all Humana associates, vendors and providers.

- Providing specialized language assistance and ADA training as part of job role training.
- Clinical staff training provides an introduction to health disparities and an overview of the influence cultural beliefs have on an individual's health. 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.
 - 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.
- Provider training policies and procedures and training materials are in place to ensure culturally competent services are delivered to enrollees. All providers, including medical, behavioral, long-term care and pharmacy, are made aware of Humana's policies and procedures for all facets of cultural competency and are provided updates as needed.
 - Providers may view a complete copy of Humana's language assistance and alternative plan on the provider area of Humana's website.
 - 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.
 - Examples of training include:
 - 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.
 - Provider newsletter articles with tips for providing culturally competent care.
 - Multilingual health education Web resources.
 - Oral interpretation and ADA requirements.

Element 7: Provider 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, according to the processes described below:

- a) Provider contracts include a general statement indicating that Humana providers are required to comply with the LAP that is documented by this plan.

- b) In order to support provider compliance with the LAP, Humana provides information to contracted providers to notify them of the components of Humana's LAP and the availability of language assistance services.
- c) Humana includes notification of available language services in an end-of-year mailing to dental providers and directs them to the Web provider portal to obtain more information (see Appendix F for a copy of the provider notice).
- d) Humana's Web provider portal contains a notice for medical and dental providers information about the LAP's components and how providers can access interpretation services for LEP members.
- e) 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 create an easy process for providers to meet the government regulations. Access is available at: <https://www.voiance.com/services/AccountSignUp/ServiceAgreement.aspx?q=d0db2690-d029-4197-8eee-27e292848969>.
- f) The notice communicates to providers the need to provide culturally sensitive care to LEP members. Humana's Web provider portal contains links with information about culturally sensitive care and available training courses for continuing education credit.
- g) The notice advises providers to encourage LEP members to make use of Humana's professional interpretation services at all points of contact. However, providers may respect an LEP member's request to use a family member or friend as an interpreter in a non-emergency situation or to use a minor as an interpreter in an emergency situation. The notice directs providers to document these instances.
- h) Humana monitors the adherence of contracted providers to the elements of the LAP by reviewing complaints submitted by members regarding providers, language access issues, and language assistance. Complaints are tracked and coded according to indicators that denote issues with access to language services within Humana's contracted provider networks. The coding structure identifies complaints or grievances about language services in a provider's office regarding the following variables:
 - i. Individual access to oral interpretation services;
 - ii. The timeliness, quality, or accuracy of oral interpretation services;
 - iii. The proficiency of the interpreter providing language services;
 - iv. Ability to access interpretation services at all points of contact that may be reasonably anticipated;
 - v. The range of interpretation services available;
 - vi. Sensitivity to the culture of an LEP member;
 - vii. A member's request to use a family member or friend as an interpreter, in non-emergency situations;
 - viii. A member's request to use a minor as an interpreter in the case of an emergency.
- i) When complaints are received regarding language assistance in a provider's office, Humana investigates the issue and documents corrective action as necessary.

- j) Humana benchmarks models and proven strategies to improve member experience and clinical outcomes for our non-English-speaking and disabled enrollees.
- k) 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).
- l) Spanish versions of member satisfaction surveys are available.
- m) 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. 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.
- n) Access and quality examples include:
 - a. Cross-functional/multidepartment collaborations focused on strategic planning and integration of data collection and culturally competent services within health plan operations.
 - b. 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.
 - c. A work plan documenting initiatives operationally to improve the consumer experience of non-English-speaking and ADA enrollees.
 - d. Participation in the National Health Plan Collaborative, an AHIP-led partnership of commercial, Medicare and Medicaid health insurance plans, the goals of which are to reduce racial and ethnic health care disparities.
 - e. Review of customer complaints and grievances for non-English and ADA members.

Element 8: Stakeholder Consultation

- 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, Virginia and Illinois Medicaid).
 - Ethnographic research (language and disability).

Element 9: Emergency and Business Continuity Preparedness

- 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

- Humana ensures all enrollees (current and future) can use language assistance services to access important digital information.
- Humana makes available all unsecured **Humana.com** Web content in Spanish,

including Physician Finder, wellness calendars, newsletters, enrollment materials, health education materials, information on Humana *Beginnings*, Moms First, Humana Achieve, Humana Active Outlook and more. Other examples include:

- Website – Section 508 compliant.
- Glossary.
- English and Spanish capabilities.
- Language and cultural competency information.

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 procedures for evaluating the effectiveness of the LAP and confirming compliance with the regulations are as follows:

- a) The Language Assistance Plan is evaluated regularly and at maximum yearly.
- b) The Humana LAP/LEP/ADA Compliance Officer (Director of Communications) is responsible for the communication needs of the members and ensuring that "equality of opportunity for meaningful access" is occurring for all members regardless of language, race, gender, sex, disability, religion...etc.
- c) Humana Language Assistance & Alternative Format Services meets with Compliance quarterly to review Limited English Proficiency and Americans with Disabilities Compliance to Federal and State DOI regulations and guidance.
- d) The LAP's determination of the threshold language(s) will be validated by a review of data collected on written and spoken language preferences.
- e) Assessment of language needs among LEP members by analyzing complaint data and member requests for translation and interpretation services occurs regularly throughout the year.
 - i. Humana Language Assistance & Alternative Format Services evaluates the following quality monitoring components in order to assess the LAP's ability to document and respond to requests for language services:
 - Translation processes, standards, utilization, and turn-around time for requests;
 - Interpretation availability, standards, and utilization.
 - ii. The Humana Language Assistance & Alternative Format Services will assess the LAP's ability to meet the needs of LEP members, by analyzing member grievances and complaints regarding language assistance services. Humana has a standard coding structure to denote incoming complaints about access to language services within the health plan's operations and within Humana's provider network. The coding structure allows Humana to classify incoming complaints by a member's primary issue regarding access to language services. Several departments including Grievances and Appeals, Critical Inquiry, and the Customer Care Center track these complaints and report to the Humana

Language Assistance & Alternative Format Services on a regular basis. These reports are monitored and evaluated by the Humana Language Assistance & Alternative Format Services in order to assess the LAP.

- iii. The Humana Language Assistance & Alternative Format Services will assess associate knowledge of the LAP policies and procedures and ability to implement by evaluating updates to the Mentor system, which stores instructional documentation, as well as staff feedback and questions pertaining to documentation in Mentor.
- iv. Business areas will be required to report whether language assistance resources, policies, and procedures are current and reviewed yearly.
- f) Based on reports submitted, if problems in the LAP are identified, the Humana Language Assistance & Alternative Format Services will document and identify the appropriate business area to take corrective action.
- g) Humana's Language Assistance and Alternative Formats Services work plan is available upon request.

Appendix A: List of Translated Standard Vital Documents

Form Name	English Form Number	Spanish Form Number
Applications – Small Business Medical		
All Plans 51-99	CA-99955-MG	CA-99955-MG-SP
All Plans 10-50	CA-99955-HH	CA-99955-HH-SP
All Plans 2-9	CA-99955-SG	CA-99955-SG –SP
EE Change Form	GN-99955-CG	GN-99955-CG-SP
Cobra Form	GN-00517-HH	GN-00517-HH-SP
Kits – Small Business Medical		
Member Enrollment Kit	BN-50123-SB	SB-50123-09
Business Forms – Privacy Forms for Small Business Medical & Specialty		
Privacy Notice	GN-14474-HH	GN-14474-SP
Consent for Release of Protected Health Information (PHI)	ReleaseConsent4/08	ReleaseConsentSP4/08
Revocation for Consent to Release PHI	RevocationConsent4/08	RevocationConsentSP4/08
Request for Account of Disclosure	AccountingDisclosure4/08	AccountingDisclosureSP4/08
Request for Amendment to Your PHI	AmendmentRequest4/08	AmendmentRequestSP4/08
Request to Access PHI	AccessRestrictions4/08	AccessRestrictionsSP4/08
Request for Restriction to PHI	Restrictions4/08	RestrictionsSP4/08
Request for Termination of Restriction	TerminationRestrictions4/08	TerminationRestrictionsSP4/08
Request for Alternative Communication	AlternativeCommunications4/08	AlternativeCommunicationsSP4/08
HIPAA Privacy Complaint Form	PrivacyComplaintForm4/08	PrivacyComplaintFormSP4/08
Flyers		
Vision Discount Flyer	GN-50720-SB	GN-50720-SP
Right Source RX Service	GN-51215-SB	SB-51215-SP
RX3	GN51216-SB	SB-51216-SP
RX4	GN-51217-SB	SB-51217-SP
RX Impact	GN-51218-SB	SB-51218-SP
Health Resource	GN-51219-SB	SB-51219-SP
Urgent Care VS ER Info for Member	GN-51222-SB	GN-51222-SP
Member Wellness	GN-51223-SB	GN-51223-09
Web Info	GN-67523-SB	SB-67523-SP
Plan Summaries Medical – Small Business (renewal only)		
Standard Copay Plan Indemnity Plan CoverageFirst 02	No form number customizable via plan summary link on agent portal	
Product Brochures		
Regulatory Pre-Enrollment	CA-14607-HH	CA-14607-SP
Brochures & Guides		
Physical Activity	GN-51317-SB	GN-51317-09
Back Pain	GN-51318-SB	GN-51318-09
Nutrition	GN-51319-SB	GN-51319-09
Stress Management	GN-51321-SB	GN-51321-09
Weight Management	GN-51320-SB	GN-51320-09
Tobacco Cessation	GN-51322-SB	GN-51322.09
Corphealth EAP Flyer	GN-51208-SB	GN-51208-09

Form Name	English Form Number	Spanish Form Number
Applications – Specialty Vision		
EE Dental, Life & Vision	CA-99955-HD	CA-99955-HD-SP
Evidence of Health Status	CA-99955-HD	CA-99955-HD-SP
EE Change Form	GN-99955-CG	GN-99955-CG-SP
Brochures – All Group Level Info		
Member Enrollment – Eyemed	GN-51569-HV	GN-51569-09
Member Enrollment – VCP	GN51570-HV	GN-51570-09
Plan Summary		
Humana Vision Optimum Plan	GN-512-HV	SP-51260-HV
Humana Vision Focus Plan	GN-51261-HV	SP-51261-HV
Humana Vision Advantage Plan	GN-51262-HV	SP-51262-HV
Humana Vision Exam Plus Plan	GN-51527-HV	GN-51527-09
Applications – Specialty Dental		
EE Change Form	GN-99955-CG	GN-99955-CG-SP
EE Dental & Life	CA-9955-HD-SP	CA-99955-HD-SP
Evidence of Health	CA-99955-HS	CA-99955-HS-SP
Brochures & Grid		
Member Welcome Brochure Humana Dental Plans	GN50822-HD	GN-50822-09
Business Forms		
CA Declaration of Domestic Partnership	CA-67609-HD	CA-67609-09
Member Eligibility Form	Customer Care desk top	Customer Care desk top
Flyers		
Vision Discount Flyer	GN-50720-HD	GN-50720-09
Vision Member Enrollment Flyer Eyemed	GN-51569-HV	GN-51569-09
Vision Member Enrollment VCP	GN-51570-HV	GN-51570-09
Web Info	GN-67523-HD	GN-67523-09
Dental PPO Network	GN-67617-HD	GN-67617-09
My Dental IQ	GN-51281-HD	GN-51281-09
Humana Vision Lens Savings	GN-51766-HV	GN-51766-09
Kits		
Member Enrollment Kit	GN-50123-HD	GN-50123-09
Plan Summary		
CA-PPO	CA-51288-HD	CA-51288-09
CA-Traditional Preferred	CA-51289-HD	CA-51289-09
Golden West Preferred Choice	CA-51629	CA-51629-09
Vision 89E	CA-62940-HD	CA-62940-09
Premier Advantage	CA-65896-HD	CA-65896-09
Golden West Cosmetic Ryder	CA-66155-HD	CA-66155-09
Golden West 89L2	CA-69941-HD	CA-69941-09
Golden West 89L3	CA-69942-HD	CA-69942-09
Traditional	GN-50819-HD	GN-50819-09
PPO	GN-50820-HD	GN-50820-09
Traditional Preferred	GN-50821-HD	GN-50821-09
Web – Member Portal – Member Forms		
Provider Directory	No form number available online	

Form Name	English Form Number	Spanish Form Number
Med SUP		
Enrollment Application	CA85026RR	CA85026RS 506
Supp to Enrollment Application – Current	CA85032RR	CA85032RS 506
Supp to Enrollment Application – Revision Files	CA85039RR	CA85039RS 1008
Notice of Replacement	GN97031RR	GN97031RS 506
Outline of Coverage	CA81077RR	CA81077RS 506
Q&A Brochure	GN95197RR	GN95197RS 406
Policy CA-MESA	CA-MESA	CA-MESA_RS
Policy CA-MESB	CA-MESB	CA-MESB_RS
Policy CA-MESC	CA-MESC	CA-MESC_RS
Policy CA-MESF	CA-MESF	CA-MESF_RS
Policy CA-MESF (HD)	CA-MESF (HD)	CA-MESF(HD)_RS
Policy CA-MESK	CA-MESK	CA-MESK_RS
Policy CA-MESL	CA-MESL	CA-MESL_RS
RX Discount Extra Services Flyer	GN83044RR	GN83044RS 1107
Vision Discount Extra Services Flyer	GN83043RR	GN83043RS 1107
Notice of Privacy Practices	GN-29100-HH	GN-29100-SP
2008 Choosing a Medigap Policy	CMS PUB NO 02110 – English? Or SP #	Spanish version currently not available from CMS
Direct Response Fulfillment	GH-22090_CM_CA	RS-22090_CM_CA
Clinical Operations Humana Beginnings		
Pregnancy Parenting Handbook		
Taking Care of Your Child		
Personal Nurse (vendor used)		

Appendix B: Sample Translation Certificate of Accuracy (from Language Speak)



Speaking your customer's language

STATE OF FLORIDA)
)
COUNTY OF MIAMI-DADE)

LANGUAGESPEAK AFFIDAVIT OF TRANSLATION

I, the undersigned, being duly sworn, depose, say and certify that the documents named

“Dental codes for CS600-SPA”

attached herein, is an accurate and true translation to the best of our knowledge, ability and belief of the original document.

Olga Vilaplana

Olga Vilaplana
LanguageSpeak Project Manager



CERTIFICATE

STATE OF FLORIDA)
)
COUNTY OF MIAMI-DADE)

I, the undersigned authority, hereby certify that the foregoing document was presented before me by Olga Vilaplana, who is known to me.

WITNESS my hand and official seal, this 5th day of August, 2008

Olga I. Romeo
Olga I. Romeo
Notary Public, State of Florida



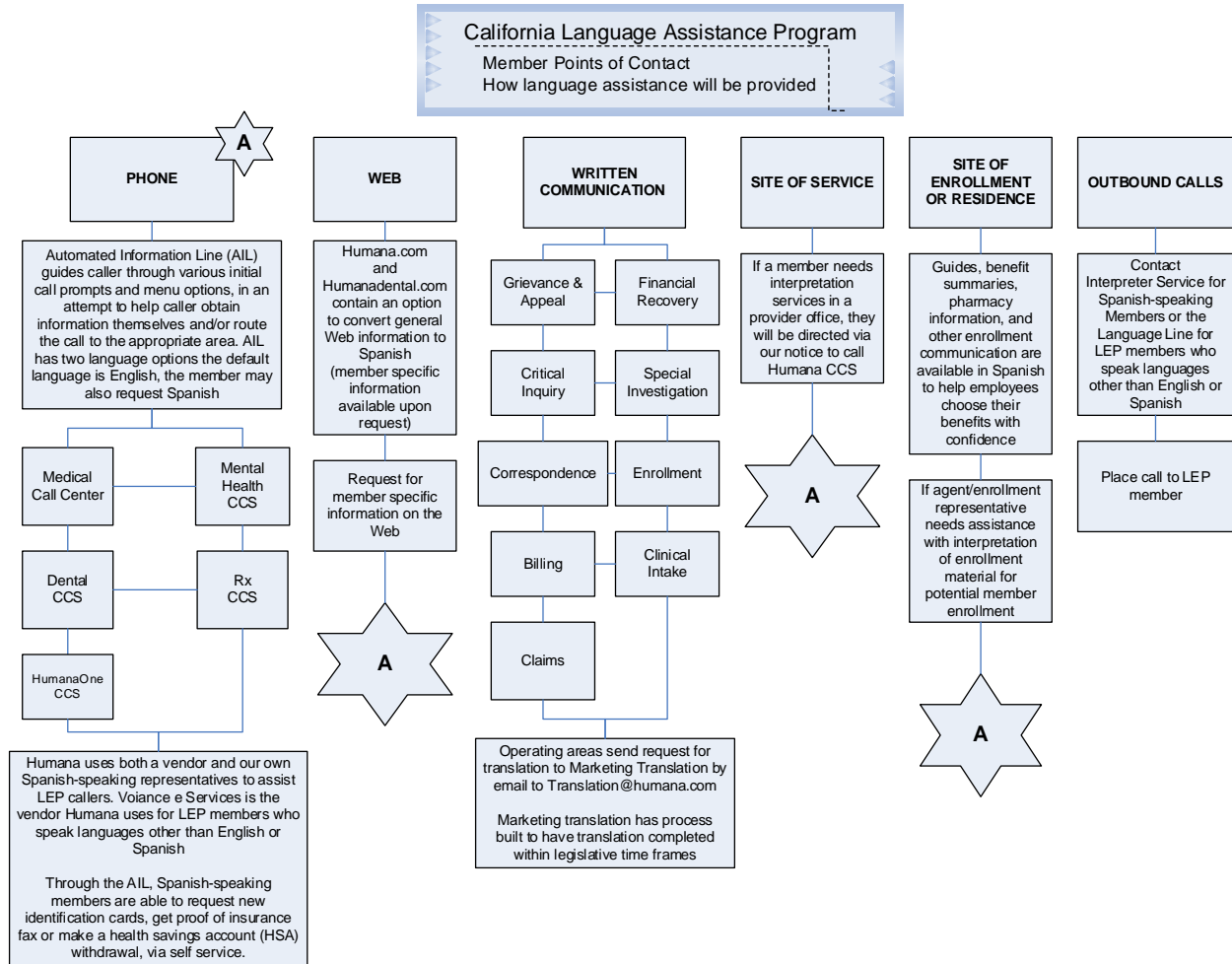
Notary Public Seal

Project No. 80233

LANGUAGESPEAK, INC.
5975 Sunset Drive, Suite 803, Miami, FL 33143
PH: 305.568.9797 FX: 305.574.8147
EM: ataddeo@languagespeak.com
www.languagespeak.com

On-Site Tutoring
Translation
Interpretation
All Languages

Appendix C: Member Points of Contact and Language Assistance



Appendix D: Voiance Services Interpreter Code of Ethics

Confidentiality: The Interpreter shall respect all confidences received in the course of interpretation. All information gained by the Interpreter in the course of his/her professional duties shall remain strictly confidential.

Accuracy and completeness: The Interpreter shall render, to the best of his/her ability, a complete and accurate interpretation without altering or omitting anything that is stated. Interpreter shall not add to what is said nor provide unsolicited explanation.

Impartiality: The Interpreter shall be impartial and unbiased and shall refrain from conduct that may give an appearance of bias. He/she shall not allow personal opinions to interfere with his/her duties nor add unsolicited comments or make recommendations except to assist communication.

Conflict of interest: The Interpreter shall disclose any real or perceived conflict of interest. He/she shall not take personal advantage, financial or otherwise, of information obtained in the course of his/her work.

Disqualification and impediments: The Interpreter shall, at all times, assess his/her ability to maintain Voiance Services' highest standards for professional interpretation. He/she shall immediately convey any reservations about his/her ability to successfully complete the assignment, for the customer. The Interpreter shall decline any assignment he/she believes to be beyond his/her technical knowledge or linguistic ability.

Accreditation: The Interpreter shall only interpret for the language(s) for which he/she is authorized to interpret by Voiance Services and as certified by Voiance Services.

Professional courtesy: Interpreter shall provide excellent customer service. He/she shall maintain a professional demeanor, be courteous, and use the tone of voice appropriate to the situation. Interpreter shall defer to instructions from clients.

Professional development: Interpreter shall continually improve his/her skills and knowledge. Interpreter shall maintain and improve his/her Interpreter skills and knowledge through activities such as professional training or education and interaction with colleagues and specialists in related fields. The Interpreter shall keep informed of, adhere to, and conform his/her practices to Voiance Services policies and guidelines that relate to his/her professional duties.

High standards of conduct: The Interpreter shall act at all times in accordance with the standards of conduct, and decorum appropriate to his/her profession as an over-the-phone Interpreter.

Appendix E: Member Notice of Availability of Language Assistance

Multi-language Interpreter Services

English: We have free interpreter services to answer any questions you may have about our health or drug plan. To get an interpreter, just call us at 1-800-457-4708. Someone who speaks English/Language can help you. This is a free service.

Spanish: Tenemos servicios de intérprete sin costo alguno para responder cualquier pregunta que pueda tener sobre nuestro plan de salud o medicamentos. Para hablar con un intérprete, por favor llame al 1-800-457-4708. Alguien que hable español le podrá ayudar. Este es un servicio gratuito.

Chinese Mandarin: 我们提供免费的翻译服务，帮助您解答关于健康或药物保险的任何疑问。如果您需要此翻译服务，请致电 1-800-457-4708。我们的中文工作人员很乐意帮助您。这是一项免费服务。

Chinese Cantonese: 您對我們的健康或藥物保險可能存有疑問，為此我們提供免費的翻譯服務。如需翻譯服務，請致電 1-800-457-4708。我們講中文的人員將樂意為您提供幫助。這是一項免費服務。

Tagalog: Mayroon kaming libreng serbisyo sa pagsasaling-wika upang masagot ang anumang mga katanungan ninyo hinggil sa aming planong pangkalusugan o panggamot. Upang makakuha ng tagasaling-wika, tawagan lamang kami sa 1-800-457-4708. Maaari kayong tulungan ng isang nakakapagsalita ng Tagalog. Ito ay libreng serbisyo.

French: Nous proposons des services gratuits d'interprétation pour répondre à toutes vos questions relatives à notre régime de santé ou d'assurance-médicaments. Pour accéder au service d'interprétation, il vous suffit de nous appeler au 1-800-457-4708. Un interlocuteur parlant Français pourra vous aider. Ce service est gratuit.

Vietnamese: Chúng tôi có dịch vụ thông dịch miễn phí để trả lời các câu hỏi về chương sức khỏe và chương trình thuốc men. Nếu quý vị cần thông dịch viên xin gọi 1-800-457-4708. sẽ có nhân viên nói tiếng Việt giúp đỡ quý vị. Đây là dịch vụ miễn phí.

German: Unser kostenloser Dolmetscherservice beantwortet Ihren Fragen zu unserem Gesundheits- und Arzneimittelplan. Unsere Dolmetscher erreichen Sie unter 1-800-457-4708. Man wird Ihnen dort auf Deutsch weiterhelfen. Dieser Service ist kostenlos.

Korean: 당사는 의료 보험 또는 약품 보험에 관한 질문에 답해 드리고자 무료 통역 서비스를 제공하고 있습니다. 통역 서비스를 이용하려면 전화 1-800-457-4708 번으로 문의해 주십시오. 한국어를 하는 담당자가 도와 드릴 것입니다. 이 서비스는 무료로 운영됩니다.

Y0040_TRANSLT2_14 Accepted

Russian: Если у вас возникнут вопросы относительно страхового или медикаментного плана, вы можете воспользоваться нашими бесплатными услугами переводчиков. Чтобы воспользоваться услугами переводчика, позвоните нам по телефону 1-800-457-4708. Вам окажет помощь сотрудник, который говорит по-русски. Данная услуга бесплатная.

Arabic:

إننا نقدم خدمات الترجمة الفورية المجانية للإجابة عن أي أسئلة تتعلق بالصحة أو جدول الأدوية لدينا. للحصول على مترجم فوري، ليس عليك سوى الإتصال بنا على 1-800-457-4708. سيقوم شخص ما يتحدث اللغة العربية بمساعدتك. هذه الخدمة مجانية.

Hindi: हमारे स्वास्थ्य या दवा की योजना के बारे में आपके किसी भी प्रश्न के जवाब देने के लिए हमारे पास मुफ्त दुभाषिया सेवाएँ उपलब्ध हैं। एक दुभाषिया प्राप्त करने के लिए, बस हमें 1-800-457-4708 पर फोन करें। कोई व्यक्ति जो हिन्दी बोलता है आपकी मदद कर सकता है। यह एक मुफ्त सेवा है।

Italian: È disponibile un servizio di interpretariato gratuito per rispondere a eventuali domande sul nostro piano sanitario e farmaceutico. Per un interprete, contattare il numero 1-800-457-4708. Un nostro incaricato che parla Italianovi fornirà l'assistenza necessaria. È un servizio gratuito.

Portugués: Dispomos de serviços de interpretação gratuitos para responder a qualquer questão que tenha acerca do nosso plano de saúde ou de medicação. Para obter um intérprete, contacte-nos através do número 1-800-457-4708. Irá encontrar alguém que fale o idioma Português para o ajudar. Este serviço é gratuito.

French Creole: Nou genyen sèvis entèprèt gratis pou reponn tout kesyon ou ta genyen konsènan plan medikal oswa dwòg nou an. Pou jwenn yon entèprèt, jis rele nou nan 1-800-457-4708. Yon moun ki pale Kreyòl kapab ede w. Sa a se yon sèvis ki gratis.

Polish: Umożliwiamy bezpłatne skorzystanie z usług tłumacza ustnego, który pomoże w uzyskaniu odpowiedzi na temat planu zdrowotnego lub dawkowania leków. Aby skorzystać z pomocy tłumacza znającego język polski, należy zadzwonić pod numer 1-800-457-4708. Ta usługa jest bezpłatna.

Japanese: 当社の健康 健康保険と薬品 処方薬プランに関するご質問にお答えするために、無料の通訳サービスがあります。通訳をご用命になるには、1-800-457-4708にお電話ください。日本語を話す人 者が支援いたします。これは無料のサービスです。

Y0040_TRANSLT2_14 Accepted

Appendix F: Provider Notice of Availability of Language Assistance

Language assistance and diversity

Health care providers are required by their Humana contracts and federal regulations to ensure Humana members have equality of opportunity for meaningful access to health care services and activities. Health care providers must also have policies in place to protect patients from discrimination. The information below may assist providers in meeting these requirements.

Oral interpretation and sign language requirements

Oral interpretation services (including American Sign Language) must be available in the member's language at no cost to the member. Please note:

- More than 300 languages are spoken in the United States.
- A notification of the availability of oral interpretation services should be posted or distributed to patients.
- If patients with limited English proficiency request an interpreter in their language, oral interpretation may be delivered over the phone, in person or via video remote interpretation.
- If a deaf or hard-of-hearing patient requests sign language interpretation, this should be delivered in person or via video remote interpretation.

Language assistance resources

Learn about Humana's multilingual health resources for health care providers and access helpful links by reviewing this flier:

Multilingual health resources

Learn what Humana is doing to ensure its members have "equality of opportunity" for meaningful access to health care services and activities by reviewing this document.

Questions?

Health care providers with questions about Humana's language assistance requirements should call Humana at the phone number listed on the member's Humana identification card or send an email to accessibility@humana.com.

California providers please note: Your contract requires your compliance with Humana's language assistance program (LAP). Humana's LAP includes the following components:

- A survey to assess the language preferences of our membership
- Translation of all vital documents into Spanish
- A process to maintain quality and accuracy in written translations
- A process to confirm the ethics and proficiency of internal translation staff and vendor staff

- A process to provide individual member access to qualified oral interpretation or in-language services to all limited English proficiency (LEP) members
- A process to monitor interpretation services to confirm compliance with the LAP
- A process to notify members of language assistance services
- A process to notify providers of our LAP requirements and inform them of the availability of services
- A training plan for staff who have routine contact with LEP members
- A process to evaluate the effectiveness of the LAP and confirm compliance with the regulations

Further, providers are contractually required to provide the following services or policies for patients:

- Free oral interpretation services
- Standards and mechanisms to confirm the timeliness, quality and accuracy of oral interpretations
- Standards and criteria to promote the proficiency of interpreter services
- Identification of points of contact where the need for interpretation is reasonably anticipated and a plan of how the provider will provide timely access to interpretation services at all points of contact
- Range of interpreting services and types of resources needed to provide effective interpreting
- Mechanisms for promoting sensitivity to the culture of those with limited English-speaking proficiency
- Policy regarding a patient's request, in a nonemergency, to use a family member or friend as the interpreter
- Policy regarding use of a minor as an interpreter in an emergency

Appendix G: Notification of Availability – www.humana.com

Humana Language Assistance & Alternative Formats Services

Focusing on Consumer Experience for our Limited English Proficiency (LEP) and Disabled Members

Humana maintains a strong commitment to ensuring “equality of opportunity for meaningful access to healthcare services and activities.” Humana provides “oral Interpretation” at no cost including sign language as well as alternative formats i.e. Braille, Audio, Large Print and accessible PDF’s) for our members. Our website is also designed to be accessible to and usable by everyone.

What should a member with a disability or limited English proficiency do to ensure their needs are met?

- If you are deaf, when scheduling an appointment with your doctor, if you require a sign language interpreter, please request at that time, a sign language interpreter to be provided for you.
 - if the doctor states they will not provide an in-person sign language interpreter contact the customer care center number on the back of your member id to request the process for a sign language interpreter. When calling the customer care center TTY services are available.
- If you are blind, and require healthcare information in an alternative format, contact the customer care center number on the back of your member id or email accessibility@humana.com. Auxiliary aids/alternative formats are available, at no cost, (i.e. accessible PDF’s, Braille, Audio, Electronic Large Print PDF’s (scaled to 6400% of actual), printed large print format, and Oral interpretation).
- If you are blind or have low vision and would like an oral interpreter to assist you with accessing the Humana website and your communications (i.e. summary of benefits, claims...etc) – send a request to accessibility@humana.com.
- If you have limited English proficiency and require an oral interpreter, please contact the customer care center number on the back of your member id and request an oral interpreter. Over the phone interpretation is available in 200 languages.

What type of oral and other communication assistance is available?

- American Sign Language (ASL) interpreters (in-person)
- Over the Phone Interpretation (200 languages)
- Tactile interpreters for those who are Deaf-Blind
- Linguistically trained Oral Interpreters for Blind members
- Video Remote Interpretation via website/apps from a smartphone or computer
- Teletype (TTY)

Do members pay for communication assistance?

No, the provider or managed care organization provides, at no cost, to the member.

When do I ask for communication assistance?

Ask when you are:

- Scheduling your appointment with your doctor
- When contacting Humana
- When scheduling a hospital admissions
- When scheduling or participating in any healthcare service or activity that is covered by Humana.

What else can I do to make sure I get the communication assistance that I need?

Let the staff know (doctor, hospital, Humana), if you feel that your communication needs are not being met, and ask for help.

Who do I contact if I have questions or concerns?

Please contact Humana Customer Service the number is on the back of your member id card or send email to accessibility@humana.com.

Appendix H: Voiance Average Second to Answer by Language – CMS 7-minute rule

Language	Average Seconds to Answer (ASA) - January 2015-October 2015	Sum of Minutes
Spanish	18	3,716,052
Haitian Creole	6	159,775
Vietnamese	6	88,870
Mandarin	9	64,612
Korean	9	45,847
Russian	9	43,206
Polish	13	40,620
Cantonese	15	21,793
Arabic	8	17,412
Brazil-Portuguese	12	16,847
Hindi	12	12,914
Tagalog	14	11,273
French	10	10,819
Italian	21	8,697
Greek	19	8,130
French Creole	15	7,016
Farsi	10	6,227
Gujarati	18	5,759
Romanian	11	5,119
Japanese	9	4,282
Filipino	13	4,228
Armenian	11	3,886
Bosnian	20	3,172
Urdu	14	3,106
Lao	21	2,972
Amharic (Ethiopia)	14	2,884
Serbian	20	2,768
Cambodian	16	2,765
Persian	16	2,484
Bengali	11	2,471
Nepali	10	2,203
Punjabi	14	2,102
Croatian	17	1,810

Portuguese	23	1,729
Albanian	14	1,648
Thai	24	1,594
Ilocano	14	1,363
Hungarian	12	1,338
Ukrainian	18	1,314
Malayalam	13	1,100
Hmong	16	1,010
Turkish	14	946
Burmese	7	824
Somali	13	729
Tigrigna (Eritrea)	21	707
Hebrew	20	701
Ethiopian	29	683
Telugu	21	622
Kurdish	31	614
Indonesian	21	597
Bulgarian	12	554
Karen	20	505
German	17	478
American Sign Language VRI	26	459
Tamil	14	441
Khmer	17	353
Fukienese	21	271
Taiwanese	31	215
Swahili	17	204
Tongan	16	199
Macedonian	30	155
Kirundi	17	154
Sudanese Arabic	9	149
Dari (Afghanistan)	25	148
Assyrian	11	139
Yemeni Arabic	35	128
Yugoslavian	14	126
Karenni/Kayah	47	122
Oromo (Ethiopia)	17	121
Chin	40	120
Levantine	27	118

Arabic		
Yiddish	15	116
Pashto (Afghanistan)	20	112
Toishanese	19	106
Marathi	32	102
Toisan	45	99
Shanghainese	4	98
Yoruba	7	92
Malay	16	88
Afghan	34	86
Serbo-Croatian	23	77
Chaldean	34	75
Georgian	16	71
Ibo	19	68
Twi	31	65
Cebuano	12	65
Saudi Arabic	81	63
Kunama	19	62
Kurdish (Sorani)	33	60
Sinhala	17	57
Wolof	11	55
Mongolian	12	54
Kurdish (Kurmanji)	38	52
Guamanian	34	52
Ga	28	49
Portuguese Creole	124	48
Hunanese	21	47
Tibetan	19	46
Lingala	16	43
Soninke (Sarahuleh)	31	42
Czech	6	41
Jula	64	38
Lithuanian	7	38
Kinya/Rwanda	82	36
Bambara	39	35
Dinka (Sudan)	34	35
Navajo	26	33
Neapolitan	17	24

Kazakh	27	24
Kikuyu	10	21
Kanjobal	0	21
Belorussian	18	19
Uzbek	13	18
Mandingo	36	18
French Canadian	7	18
Egyptian Arabic	11	15
Maay Somali	40	14
Fulani	14	13
Foochow	29	13
Mixteco	8	13
Fanti	12	11
Krio	0	11
Hokkien	17	10
Slovak	0	9
Sylheti	28	9
Pulaar	0	8
Samoan	0	6
Akan	30	5
Iraqi Arabic	10	5
Moldovan	22	5
Malinke	142	4
Kurdish (Badini)	0	4
Dutch	20	3
Armenian (Eastern)	11	3
Crioulo	21	3
Norwegian	20	2
Soninke	39	1
Eritrean	12	1
Mandinka	15	1

Appendix I: Survey of Members (English & Spanish)



June, 2013
[Member Name]
[Member Address]

Preferred Language Questionnaire

Dear Humana Member,

Understanding the details about your healthcare benefits is very important. We want to help you by using the language you are most comfortable with.

Please answer the questions at the bottom of this page and return this letter in the enclosed postage-paid envelope by **July??, 2013**.

Your answers are important because:

- We want to get an accurate count of our members' language preferences
- California law requires us to ask about your preferred language, and race/ethnicity
- By law, we may need to communicate with you in a language other than English

Answering these questions is optional and will not affect your coverage or benefits in any way.

Thank you for your time.
Sincerely,
Humana, Inc.

After placing a check mark by your preferred language below, please return this entire page in the envelope provided by **July ??, 2013**.

1. Language Preference - Speaking English Spanish Other: _____

2. Language Preference - Writing English Spanish Other: _____

We are required to ask you the following question, but you don't have to answer:

3. Race / Ethnicity - Caucasian / White African American / Black Asian
Native American or Alaska Native Native Hawaiian or other Pacific Islander
Hispanic or Latino Other _____



Junio de 2013

[Member Name]

[Member Address]

Cuestionario sobre el idioma de preferencia

Estimado/a afiliado/a de Humana:

Es muy importante comprender los detalles de sus beneficios para el cuidado de la salud. Deseamos ayudarle mediante comunicaciones en el idioma de su preferencia.

Conteste las preguntas al final de la página y devuelva la carta en el sobre adjunto con franqueo pagado antes del **?? de julio de 2013**.

Sus respuestas son importantes ya que:

- Deseamos obtener un conteo exacto de las preferencia de idioma de nuestros afiliados
- La ley en California nos exige preguntarle su idioma de preferencia y su raza/etnia
- Según la ley, puede que tengamos que comunicarnos con usted en un idioma que no sea el inglés

Es optativo responder a estas preguntas y no afectará su cobertura ni sus beneficios en n forma alguna.

Gracias por su atención.

Atentamente,

Humana Inc.

Después de seleccionar su idioma de preferencia a continuación, devuelva esta página completa en el sobre adjunto antes del **?? de julio de 2013**.

1. Idioma de preferencia – hablado *Inglés* *Español* *Otro:* _____

2. Idioma de preferencia – escrito *Inglés* *Español* *Otro:* _____

Estamos obligados a preguntarle lo siguiente, pero usted no tiene que contestarlo:

3. Raza / etnia - *Caucásico / Blanco* *Afroamericano / Negro* *Asiático*

Indio norteamericano o Nativo de Alaska *Hawaiano nativo o de otras Islas del Pacifico del Norte*

Hispano o Latino *Otro* _____



California Policyholders' Language Preference

Survey Results



September 2013

Humana



Research Background & Objectives

- This study was conducted to adhere to the regulatory requirement enacted by the State of California, which required Humana to assess the linguistic preference (both written and spoken) of their active policyholders. The requirement is ongoing and the study is to be reassessed every two years.
- The primary objective of the study was to determine what percent of Humana's California membership prefers to communicate in a specific language other than English.
- The study was designed to answer the following questions:
 - What is the spoken language preference of policyholders in the State of California.
 - What is the written language preference of policyholders in the State of California.
 - What is the race/ethnicity of policyholders in the State of California.

Humana

California Policyholders' Language Preference

2

Research Methodology

- A one-page (double-sided) paper survey was designed by Humana. Questions were included in English on one side of the paper and Spanish on the other side.
- Five files that included a total of 99,001 unique policyholders were sent to Horizon Insight via secure email.

<u>Policy Type</u>			
CBS Dental	12,491	MTV Dental	69,183
Medicare Supplement	4,889	MTV Vision	11,990
CA Medical	448		

- The file was prepared for mailing. The process, a mail merge, produced a mail packet for each individual, with a personalized letter that included the survey at the bottom and a postage-paid return envelope addressed to Horizon Insight.
- The surveys were mailed on July 26th, 2013.
- A total of 12,860 surveys were completed and returned by the cut off date of Aug. 30th, 2013.
- The survey data was entered into the original data file, linked to the respondent, and a tabular report was produced.

Executive Summary

- The survey of Humana policyholders in California has shown that 6.9% prefer to communicate in the spoken language of Spanish. Additionally, 6.3% of policyholders prefer to communicate in the written language of Spanish.
- The State of California has indicated that any insurance company with 5% of its membership of 3,000 members (whichever is less) who have said they prefer to communicate in a specific language other than English, is required to communicate in that manner.

Results of this research indicate that Humana met the threshold requirement and must provide communications in the spoken and written forms in Spanish to those who prefer that manner of communication.

Detailed Results

Preferred Language (Spoken)	n= 12,743	Race/Ethnicity	n= 10,708
English	90.5%	Caucasian/White	90.5%
Spanish	6.9%	Hispanic/Latino	6.9%
Other	2.6%	Asian	2.6%
		African American/Black	3.4%
		Native American/Alaska Native	0.7%
		Native Hawaiian/Pacific Islander	0.6%
		Other	3.0%

Preferred Language (Written)	n= 12,387
English	91.3%
Spanish	6.3%
Other	2.4%