

**Government Business Division
Policies and Procedures**

Section (Primary Department) Cultural and Linguistics		SUBJECT (Document Title) Assessment of Non-English Language Proficiency - CA	
Effective Date 11/17/2003	Date of Last Review 04/01/2024	Date of Last Revision 05/12/2023	Dept. Approval Date 04/01/2024
Department Approval/Signature:			

Policy applies to health plans operating in the following State(s). Applicable products noted below.

Products	<input type="checkbox"/> Arkansas	<input type="checkbox"/> Iowa	<input type="checkbox"/> Nevada	<input type="checkbox"/> Tennessee
<input checked="" type="checkbox"/> Medicaid/CHIP	<input checked="" type="checkbox"/> California	<input type="checkbox"/> Kentucky	<input type="checkbox"/> New Jersey	<input type="checkbox"/> Texas
<input type="checkbox"/> Medicare/SNP	<input type="checkbox"/> Colorado	<input type="checkbox"/> Louisiana	<input type="checkbox"/> New York	<input type="checkbox"/> Virginia
<input type="checkbox"/> MMP/Duals	<input type="checkbox"/> District of Columbia	<input type="checkbox"/> Maryland	<input type="checkbox"/> New York (WNY)	<input type="checkbox"/> Washington
	<input type="checkbox"/> Florida	<input type="checkbox"/> Minnesota	<input type="checkbox"/> North Carolina	<input type="checkbox"/> Wisconsin
	<input type="checkbox"/> Georgia	<input type="checkbox"/> Missouri	<input type="checkbox"/> Ohio	<input type="checkbox"/> West Virginia
	<input type="checkbox"/> Indiana	<input type="checkbox"/> Nebraska	<input type="checkbox"/> South Carolina	

POLICY:

To comply with Title VI of the Civil Rights Act of 1964, Anthem Blue Cross Medicaid (Anthem or Plan) contracts with vendor(s) to help ensure that bilingual associates who interact with members (including temporary associates), are qualified to meet the needs of limited English proficient (LEP) Anthem members.

To meet the needs of LEP members, Anthem:

1. Uses reasonable and good faith efforts to recruit and hire multilingual Customer Care Center associates, nurses and other Plan associates who are competent and qualified in non-English languages to perform their job responsibilities.
2. Assesses the language proficiency of job candidates who will be using non-English languages to meet the requirements of their job responsibilities.
3. Contracts with qualified vendors to conduct language proficiency assessments to help ensure that bilingual associates are qualified to effectively communicate with LEP members.

Anthem requires the following criteria for associate bilingual proficiency:

1. Conversational fluency in both the target language and English.
2. Correct pronunciation and manner of speaking for statements and questions.
3. Comprehension of spoken language related to both health care settings and member services.
4. Adequate bilingual vocabulary that includes, but not limited to, fluent and accurate pronunciation of managed care terminology, forms of address, greetings, directions, times and days of the week, names of the months, Plan services, processes, and procedures.
5. Ability to assist limited English proficient members to complete forms in English that are appropriate to the specific setting or circumstance.
6. Ability to precisely explain non-clinical consent forms and HIPAA Privacy Forms.

**Government Business Division
Policies and Procedures**

Section (Primary Department) Cultural and Linguistics	SUBJECT (Document Title) Assessment of Non-English Language Proficiency - CA
---	--

Anthem maintains uniform procedures for timely and effective telephone communication between staff and LEP members. These procedures include instructions for English speaking associates to obtain assistance from bilingual staff or to access assistance from approved interpreters when receiving calls from or initiating calls to LEP members.

The Plan tracks bilingual associates who pass bilingual proficiency testing and maintains a process for monitoring the bilingual language assistance program annually.

DEFINITIONS:

None

PROCEDURE:

Individual business units and/or departments with direct member contact identify their bilingual staffing needs. To fill an open position, hiring managers consult with their Talent Acquisition Representative, complete the Position Requisition Process, and include a job description, cost center, location, and job code information, and language requirements.

Anthem contracts with qualified vendors to conduct language proficiency assessments. The preferred vendor is subject to change based on business needs. Talent Acquisition coordinates with the contracted vendor to arrange testing of candidates considered for open positions. Talent Acquisition tracks whether candidates pass or fail.

Managers, with existing associates or temporary associates who need proficiency testing, contact the contracted vendor directly for payment arrangements and initiation of testing. The contracted vendor notifies the business unit of testing scores. Managers hiring temporary associates who need proficiency testing use the current Contingency Hiring Process, which includes language proficiency testing. Passing scores are dependent on the type of evaluation tool used.

Internal and external candidates that do not meet the required bilingual proficiency standards for open positions are notified by Talent Acquisition. Internal associates who do not pass the bilingual proficiency standards for their current position are contacted by their managers.

Evaluation of Bilingual Assessment Program

Anthem recruits bilingual associates that reflect the member population by requiring bilingual proficiency in certain job positions. Managers are responsible for ensuring departmental associates who interact with members utilizing a bilingual skill set are appropriately qualified

**Government Business Division
Policies and Procedures**

Section (Primary Department) Cultural and Linguistics	SUBJECT (Document Title) Assessment of Non-English Language Proficiency - CA
---	--

and achieve a passing language proficiency test score required to effectively communicate with an Anthem member.

Anthem maintains a list of associates who have been tested for bilingual proficiency and tracks associates that have met the bilingual proficiency standards. Upon request, and in alignment with regulatory requirements, the Medicaid Cultural and Linguistic Program will provide documentation identifying associates who have met the required bilingual proficiency standards when communicating with members. Additional bilingual proficiency related records are maintained in the associate's confidential personnel file.

For rehired associates who were previously bilingually certified and new associates who were certified in their previous employment, bilingual re-certification is not required, provided proper documentation is presented.

REFERENCES:

- Department of Health Care Services (DHCS) contracts
- LA Care Contract
- MMCD All Plan Letter 21-004 (REVISED 5/3/22), Standards for determining Threshold and Concentration Languages, nondiscrimination requirements, and language assistance services
- Office of Minority Health National Standards for Cultural and Linguistic Appropriate Services (CLAS)
- Senate Bill 853 (Language Assistance Program) and Knox Keene Act
- Title VI of the Civil Rights Act of 1964, Policy Guidance on the Prohibition Against National Origin Discrimination as it Affects Persons with Limited English Proficiency, pp. 4970 (1), 4972 (1), 4974 (3), 4977 (E).

RESPONSIBLE DEPARTMENTS:

Primary Department:

Cultural and Linguistics

Secondary Department(s):

CA Plan Compliance

EXCEPTIONS:

This P&P applies to Medi-Cal and MRMIP.

**Government Business Division
Policies and Procedures**

Section (Primary Department) Cultural and Linguistics	SUBJECT (Document Title) Assessment of Non-English Language Proficiency - CA
---	--

REVISION HISTORY:

Review Date	Changes
04/01/2024	<ul style="list-style-type: none"> • Annual Review – no changes
05/12/2023	<ul style="list-style-type: none"> • Annual Review • Update made to Policy section to comply with rebranding guidelines • Updated Procedure section to include bilingual re-certification information for rehires and new hires • Updated References section • Added MMCD All Plan Letter 21-004 (REVISED 5/3/22), Standards for determining Threshold and Concentration Languages, nondiscrimination requirements, and language assistance services to References Section • Removed MMCD Policy Letter 99-03, April 2, 1999, Linguistic Services, State of California Health and Human Services Agency, p. 4(2) from the References Section • Added “Secondary Department(s)” sub-header under Responsible Departments section to match template
06/29/2022	<ul style="list-style-type: none"> • Annual Review; no changes
08/06/2021	<ul style="list-style-type: none"> • Annual Review; no changes
09/22/2020	<ul style="list-style-type: none"> • Annual Review • Removed Secondary Departments: CA Regulatory Compliance, Customer Care Center, Talent Acquisition, and Northern/Southern/Central Regional Health Plans
10/03/2019	<ul style="list-style-type: none"> • Annual Review; No Changes • Update to new template
11/19/2018	<ul style="list-style-type: none"> • For Annual Review • No changes
12/12/2017	<ul style="list-style-type: none"> • Annual Review. • Updates to Exceptions section.
12/28/2016	<ul style="list-style-type: none"> • Annual Review. • Changed AIM to Medi-Cal Access Program.
12/07/2015	<ul style="list-style-type: none"> • Updated department names and reference information. • Removed statements in Procedure section about Talent Acquisition forwarding test results to hiring managers, and about Talent Acquisition contacting internal associates that did not pass testing.
12/02/2014	<ul style="list-style-type: none"> • Added statement regarding testing of temporary associates in

**Government Business Division
Policies and Procedures**

Section (Primary Department) Cultural and Linguistics	SUBJECT (Document Title) Assessment of Non-English Language Proficiency - CA
---	--

Review Date	Changes
	<p>Policy section, to align with current processes.</p> <ul style="list-style-type: none"> Removed reference to specific passing test scores, and inserted a general statement as multiple tools are available for proficiency testing.
10/28/2014	<ul style="list-style-type: none"> Updated department names and removed references to Healthy Families product.
10/31/2013	<ul style="list-style-type: none"> Removed references to Berlitz and replaced with “contracted vendor” Made grammatical corrections to improve clarity of the processes outlined in the document.
10/23/2012	<ul style="list-style-type: none"> Changed reference to “State Sponsored Business” or “SSB” to “Medicaid” in accordance with WellPoint terminology change. Removed “CMSP” in header as this product will have a separate policy.