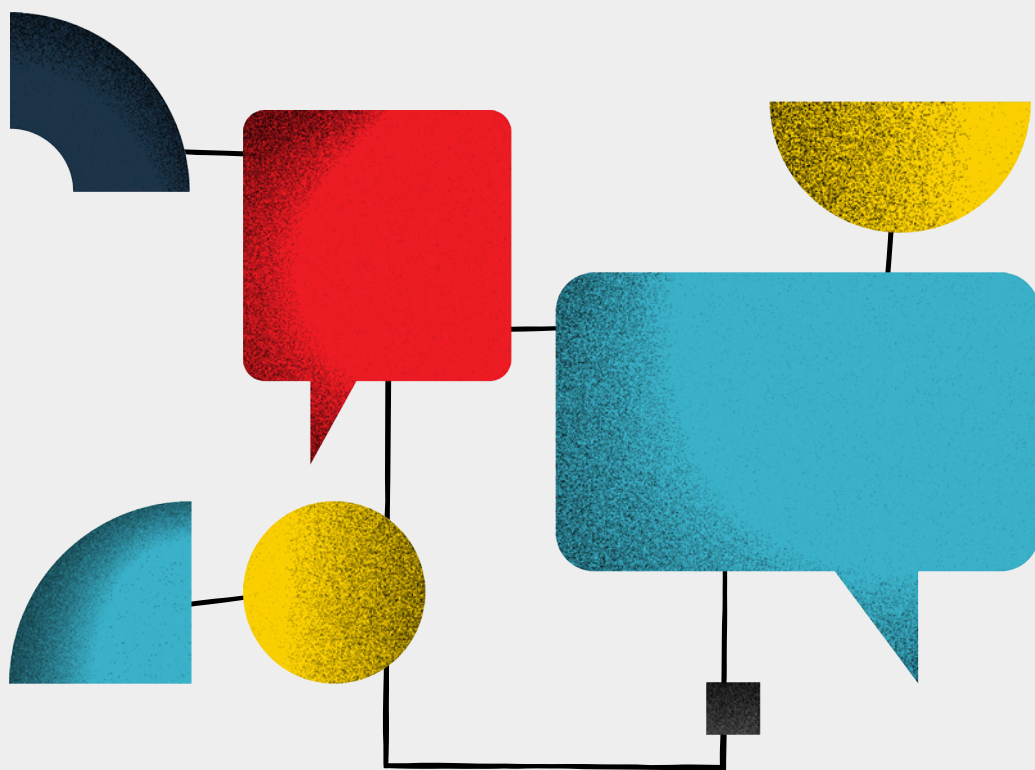


PLAYBOOK

How to build a better language access program

A guide for healthcare leaders





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Introduction

Effective language access programs are critical for bridging communication gaps and ensuring equitable care. When done right, they can enhance patient outcomes, boost customer satisfaction, and uphold legal compliance. Your language access program can potentially reduce communication problems, improve legal compliance, increase customer satisfaction, and improve patient outcomes. Are you getting those results? If not, it's time to evaluate and level up your approach.

Many healthcare organizations implement language access solutions with the best intentions and plans yet still struggle with issues like poor service quality, scalability challenges, and legal matters. These gaps not only affect patient care and customer satisfaction but also increase operational costs and legal risks.

In this guide, we'll help you identify opportunities to improve the quality and efficiency of your program to deliver better outcomes, maintain compliance, and create a more customer-centered experience.

This guide is for:

- ✓ **Payors** focused on **compliance** and looking for ways to provide faster, cost-effective, more reliable language assistance to members.
- ✓ **Healthcare group purchasing organizations** tasked with streamlining costs, and your current language vendors aren't delivering.
- ✓ **Community health leaders** committed to health equity for your community, but unreliable language services are preventing LEP patients from accessing the care they deserve.
- ✓ **Healthcare providers** seeking a better way of delivering consistent language assistance to patients in your hospital or practice.

01



The benefits of a mature language access program

The Benefits of a Mature Language Access Program

An optimized, mature language access program is fully integrated into your operations, consistently delivering high-quality language services across your organization. All the functions, roles, documentation, processes, and workflows related to language access are defined and transparent.

Here's what that looks like:

Operational Efficiency and Cost Control

A mature language access program helps your organization run more smoothly. Language assistance is woven into your daily operations with detailed processes, dedicated staff, and reliable vendors that act as an extension of your team.

There's no waiting on last-minute projects or scrambling to get an interpreter on the line while the patient anxiously awaits care or critical information. At the same time, costs are better controlled due to economies of scale and favorable vendor agreements. As a result, your team can focus on what matters most: taking care of members and patients.

Reduced Compliance Risks

Meeting regulatory requirements, like Section 1557 of the Affordable Care Act or the 2024 Medicare Advantage and Part D Final Rule, is essential—but a mature program goes further. Since high-quality language services are built into everyday operations and language access needs are being met, the chance of compliance issues or legal claims is greatly reduced. With a mature language access program, translation and interpretation are handled by expert resources, so you can trust that every word conveys the intended meaning to the LEP communities you serve.



Scalability

A mature language access program does not depend on inefficient workarounds for requesting or delivering language assistance. A flexible and responsive program with technology at its core is easy to scale up as your organization grows or begins to serve a larger or more diverse population with limited English proficiency (LEP). Scale can mean additional volume, but can also mean broader language coverage, especially regarding languages of lesser diffusion (such as Rohingya or Munduruku).

Increased Satisfaction

Language access improves experiences across every aspect of the healthcare industry.

For Payors and Plans

Language support helps members understand their plan, its procedures, and its benefits. As a result, they experience less frustration and can use their coverage effectively. Positive experiences not only lead to stronger retention and higher referrals but also directly impact critical metrics such as STAR ratings for payors.

For Providers

Language access builds a foundation of trust between providers and patients. When patients can communicate in their preferred language, they feel heard and valued, which boosts satisfaction.

Better Outcomes

Communication is at the heart of good healthcare. When people understand their treatment and benefits, they're more likely to follow their care plans. This leads to fewer errors, fewer readmissions, and better overall outcomes. A well-structured language access program provides members and patients with accurate, timely information in a way they understand, reducing risks and improving their health.



02

Current legislation and language access in healthcare

Current Legislation and Language Access in Healthcare

Healthcare regulations are constantly changing, and recent updates to federal regulations have tightened the requirements for serving LEP individuals. For payors, providers, and insurers, this means adjusting how you communicate with your LEP patients and members to meet these new standards.

Two new rules are impacting how healthcare organizations provide language access services: the [CMS 2024 Final Rule](#) and the [HHS 2024 Final Rule](#). Both rules aim to level the playing field for LEP patients and members so that they get the same quality of care as English-speaking patients and members.



Here's what you need to know about these updates:

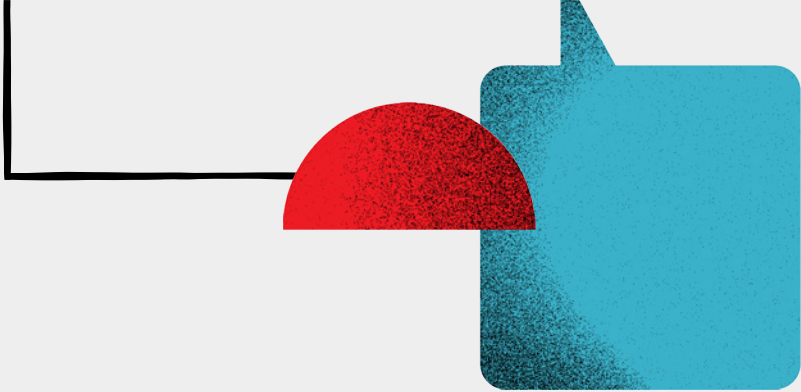
CMS 2024 Final Rule: Language Services and Medicare Advantage

CMS has rolled out new rules to improve care for **Medicare Advantage (MA)** and Part D beneficiaries. The big focus of the 2024 final rule is improving health equity. For members with LEP, that includes making sure they can access healthcare and understand their benefits without language barriers.



CMS 2024 Final Rule: Language Services and Medicare Advantage

Here's what's new:

- ✓ **Strengthened language access requirements:** Healthcare organizations must offer complete language support to all LEP members, easily accessible and free of charge. Interpreters must be qualified, and once a patient or member requests materials in their preferred language, organizations must always provide materials in that language without requiring additional requests.
 - ✓ **Impact on Star Ratings:** Quality language support now directly affects Star Ratings for MA and Part D plans.
 - ✓ **Marketing and materials:** MA and Part D plans must send key communications and marketing materials in the patient's preferred language. The rule is now in effect, and there are penalties for non-compliance.
- 

HHS 2024 Final Rule: Strengthening Section 1557

Section 1557 of the **Affordable Care Act** protects LEP patients against discrimination. The most recent updates strengthen those protections and address telehealth.

Here's the key information:

- ✓ All interpreters and translators must be qualified as professional linguists with domain expertise.
- ✓ LEP patients must have the same language support for telehealth as they do for in-person care.
- ✓ Healthcare providers need formal procedures for delivering language services.

The rule became enforceable in July 2024.

Taken together, these new regulations demonstrate a clear trend of extending language access requirements to create a more inclusive healthcare system that improves care and equity for all patients and members. That means you now need to be able to offer assistance in more languages and more quickly than ever before.

By optimizing your language access plan, your organization will be ready to meet these standards, as well as any new language access regulations that arise in the future.

03

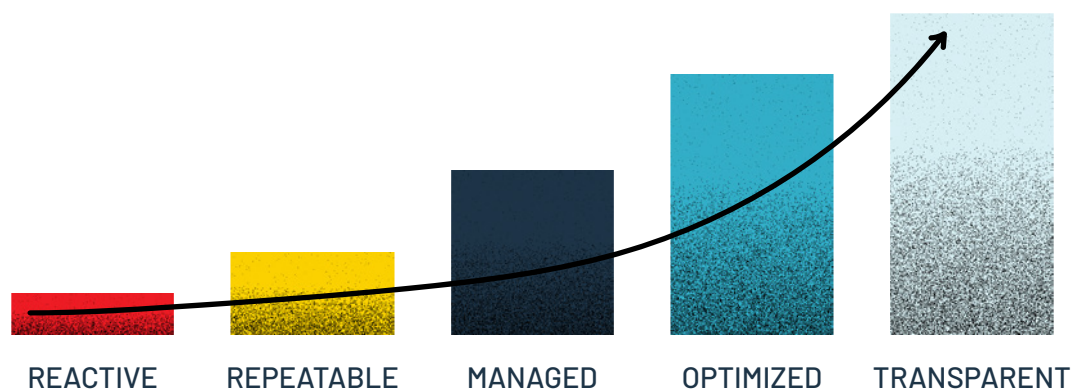


Levels of maturity in a language access program

Levels of Maturity in a Language Access Program


Every healthcare organization—whether a provider, payor, or plan—operates at a different level of maturity when it comes to language access. Some have just begun implementing solutions, while others have well-established, fully integrated programs.

Understanding where your organization stands within the context of a maturity model helps you identify your current strengths and, more importantly, where improvements are needed. By progressing through the five levels—Reactive, Repeatable, Managed, Optimized, and Transparent—your organization will improve the quality, accessibility, and effectiveness of language services.



1. Reactive

In the reactive stage, language services are handled on a case-by-case basis. While there may be a process for requesting translations or interpretation, it's often slow, hard to access, or inconsistent. Language support isn't consistent or reliable, and may not exist at all for some languages or LEP populations. At this stage, in-house staff may be used for translations or interpretation. Also, family or friends may be called in when the language in question is a rare one.



Lastly, hardly anyone in the organization is trained, and there is probably no central point of contact. This leads to frustrating gaps in communication for patients and members. For example, a provider may struggle to find an interpreter for a critical care conversation, or a payor may fail to deliver an Explanation of Benefits (EOB) promptly.

2. Repeatable

At this level, processes for handling language services are in place but may still be manual and cumbersome. While interpretation and translation requests are fulfilled, the system can still be frustratingly slow. Some process documentation and planning are in place. There may be a central point of contact for language access, but maybe not a dedicated resource. Metrics are not tracked, and it's difficult to assess program effectiveness. At this stage, there is probably no technology in place, such as translation memories to reuse past translations or terminology management to drive consistency and clarity in the way terms are used.

3. Managed

In the managed stage, language services are formalized and integrated into daily workflows. Interpretation and translation requests are processed efficiently, but some bottlenecks still exist. Providers are offering language services for most patients, but they may struggle with meeting the needs of patients who speak less common languages. Payors may be consistent with translating critical communications, but lower-priority materials may not yet be fully accessible. There is likely a dedicated or nominated language access coordinator, but all stakeholders may not be well-trained and informed. KPIs are in place, but metrics such as response times and patient/member satisfaction are sometimes difficult to track and analyze. At this stage, the organization has implemented or is looking to implement scheduling, workflow, or translation technology to manage language support.

4. Optimized

In an **optimized program**, language services are proactive and efficient across the board. You've developed scalable systems to meet the needs of a growing LEP population. Providers have real-time access to interpreters and consistently deliver care and communications in patients' and members' preferred languages. Payors and plans ensure that all member communications, whether digital or print, are available in multiple languages, creating a streamlined experience for LEP members. In this stage, there are training programs for employees, including around cultural competency, and technology such as advanced schedule systems or automatic translation is in place to drive efficiency and quality.

5. Transparent

At this most mature level, **language services** are fully integrated and transparent across your organization. You have real-time insights into how language services are used and how they impact outcomes. Data from all touchpoints—whether from provider interactions or payor communications—helps your team make informed decisions. Your program is not only compliant, but it also drives better outcomes, improves satisfaction, and contributes to overall operational success. Your dedicated language access coordinator keeps the entire staff trained and informed. You are in a state of continuous, data-driven improvement. You use the latest technology to improve the speed of delivery, guarantee quality, keep costs down and scale.

Assessing Your Program

Whether you're a provider or payor, use the descriptions of the levels above to assess where your language access program stands. Are your services reactive or proactive? Managed or optimized? Understanding your current level helps you set clear goals for improvement, so your language services can evolve to drive better patient outcomes, increased member satisfaction, and full regulatory compliance.

In the **next section**, we'll show you how to level up and evolve your language access program.



04

The 10 components of a mature language access program

The 10 Components of a Mature Language Access Program


A mature language access program goes beyond basic services to build a system that's reliable, efficient, and ready to scale when you need it.

Here's what it takes to create a language access program that works at every level.

1. Comprehensive Services

Members and patients need answers when they need them—not hours later. A mature program provides real-time and on-demand interpretation support, including Over-the-Phone Interpretation (OPI) and Video Remote Interpretation (VRI) for those urgent situations where every minute counts. Additionally, high-quality, high-volume document translation services provide preferred language or braille and large print versions of critical communications—like coverage notices and discharge instructions—that are clear, accurate, and timely.





What You Need to Make it Happen:

- ✓ Trained linguists with healthcare expertise: Interpreters and translators need more than just language skills. They should be experienced in healthcare, ensuring they can handle everything from complex medical terms to sensitive patient conversations.
- ✓ Systems for fast translation turnaround: You'll need the capability to process high-volume translation requests—whether for claims documents, EOBs, or treatment plans—without delay. Usually, this comes in the form of customized machine translation, but it can also be an efficient, human-based on-demand translation process or a combination of both.
- ✓ A language services partner: You may want to engage a specialized language services provider (LSP) to provide these services since they have the bench of resources to cover the languages and volumes you need.

2. A Designated Language Access Coordinator

Keeping track of multiple requests, regulations, service needs, and program KPIs is time-consuming. A designated language access coordinator oversees everything from interpreter scheduling to quality control, solving problems quickly and keeping everything running smoothly. They're the single point of contact for your entire organization and are the go-to resource to keep everything on track.

Here's why you need one:

- ✓ When one person owns the process, things move faster, there is less confusion, and you have a clear point of accountability.
- ✓ Improved oversight means you can spot any gaps and fix them before they affect patient care or member satisfaction.

3. Thorough Training for All Stakeholders

Even the best services fall short if people don't know how to use them. A mature program includes comprehensive training for everyone who interacts with LEP patients or members—whether it's a doctor, radiologist, or customer service representative. Training goes beyond "how to request an interpreter" and teaches staff how to work effectively with interpreters to deliver great care or service.

Key training areas include:

- ✓ **The importance of language access:** Staff should understand how language access makes a difference.
- ✓ **Language access legislation:** Everyone needs to learn what's required by law and what the penalties are.
- ✓ **Team roles and responsibilities:** People need to know who to go to for what.
- ✓ **How to request services efficiently:** Employees should be comfortable navigating your systems to get language support fast.
- ✓ **Best practices for working with interpreters:** Training on how to communicate through an interpreter promotes smooth conversations and better understanding.
- ✓ **Cultural competency:** This helps staff recognize and account for cultural differences that might affect a patient's treatment decisions or comfort level.



4. The Right KPIs to Measure Success

A mature language access program tracks the right key performance indicators (KPIs) to stay on top of performance and spot opportunities for growth. Think about what matters most to your organization: is it faster interpreter response times? More satisfied patients or members? Choose the KPIs that tie most closely to your program goals.



Examples of KPIs include:

Goal	KPI
Speed of service (interpretation)	Average connection time for interpreters—whether it's over the phone or through video.
Speed of service (translation)	Translation turnaround time—how long it takes to complete a translation project.
Quality (translation)	Translation quality scores—related to errors in grammar, accuracy, terminology, and/or style.
Quality (interpretation)	Interpreter quality scores—related to both accuracy and conduct.
Language coverage	Patient/member language availability rate –the percentage of patients or members who are receiving assistance in their preferred language documented.
Language coverage	Patient/member usage of multilingual resources –how often multilingual digital resources (like websites, apps, or patient portals) are used by patients and members.
Costs	Budget adherence—the actual costs of your language access program compared to what you've budgeted.
Compliance	Compliance metrics to ensure you're meeting regulatory requirements.
Health outcomes	Outcomes for LEP patients and members, comparing those who received language services to those who didn't.
Patient/member satisfaction	Patient/member satisfaction scores that are specifically related to language services.
Patient/member satisfaction	Frequency of language-related complaints or grievances raised by patients or members.

5. Effective Quality Control Processes

When you're dealing with something as important as healthcare, high quality is non-negotiable. A mature language access program puts rigorous quality checks in place, whether it's reviewing translations for accuracy or evaluating the performance of interpreters. Regular audits and feedback help maintain consistency and keep your services high-quality.

Quality control in action looks like this:

- ✓ **Call monitoring:** Review a sample of interpreter sessions to check for accuracy and professionalism.
- ✓ **Translation quality checks:** combine automated quality checks with reviews from professional linguists to make sure any errors are caught and corrected.
- ✓ **Established protocols:** document your protocols, such as scripts for opening and closing calls or resolving conflicts, and have your resources agree to them.
- ✓ **Feedback loops:** Incorporate feedback from both staff and patients/members to refine services and address any issues promptly.

BIG Language Solutions has a [10-point quality assurance framework](#) that we use with all our clients that covers the entire translation or interpretation process, from service initiation to billing, and measures quality, customer service, accuracy, and efficiency.

6. The Right Resources to Support the Program

To keep a language access program running smoothly, you need to have access to a large pool of healthcare-experienced interpreters and translators who know the industry's terminology and standards. Because finding, vetting, and engaging qualified resources takes a lot of time, you may want to engage a language services provider (LSP) to provide you with a large and diverse linguist pool to cover the languages and volumes you need.



7. The Best Feedback Mechanisms

A mature language access program is always improving, and the only way to do that is by listening to the members and patients who are receiving the support. An effective feedback system gathers insights from both patients and staff, helping you identify what's working and where adjustments are needed.

Here's how to gather feedback after language access interactions:

- ✓ **Written surveys:** Ask patients or members to fill out a written questionnaire (online or in person) about their experience with interpretation or translation services.
- ✓ **Informal questions:** After the appointment, the provider or front desk personnel can ask the patient or member about their experience.
- ✓ **Employee input:** Provide a formal way for your team to provide feedback on the ease of using language services and suggest process improvements.

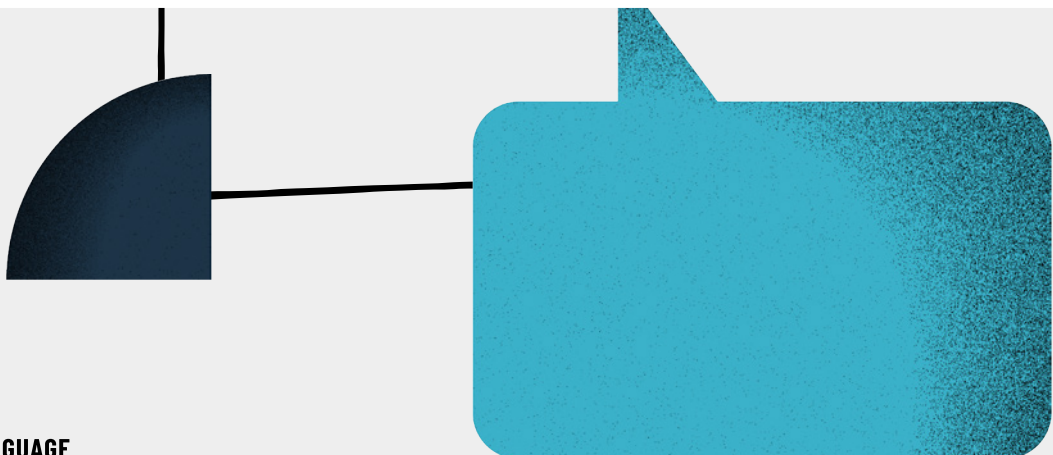
Use this feedback to make real-time adjustments that improve the quality and delivery of language services.



8. Scalable Systems

As your organization grows, so do the demands on your language access program. Whether you're expanding your patient base or increasing member enrollment, your language access services need to scale without sacrificing quality. A mature program has operations built to handle growth, with systems that can adapt to higher demand without damaging patient and member experience.

Here are two key features of scalable operations:

- ✓ **Automated systems:** From scheduling or requesting interpreters to processing translation requests, automation helps streamline workflows and keep things running smoothly at scale.
 - ✓ **Cloud-based platforms:** Centralize all language service needs in an online portal—whether it's interpretation or document translation—so your team can manage everything from translation projects to real-time interpretation usage in one place.
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9. Advanced Technology

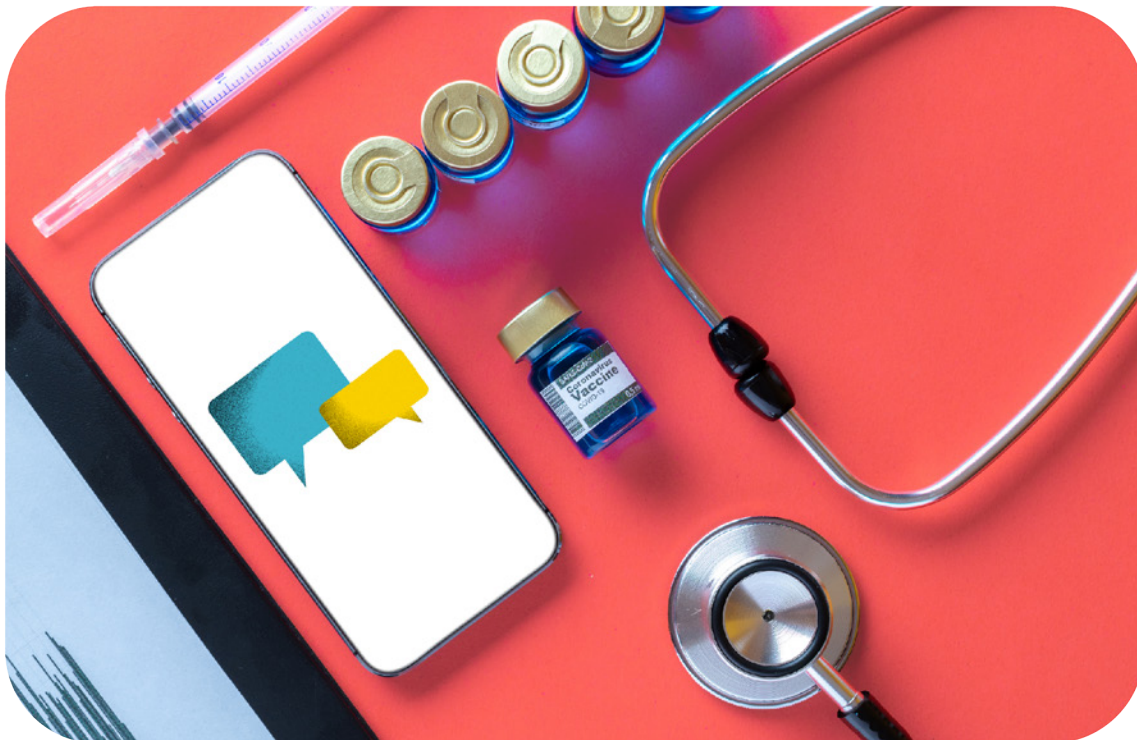
Often, technology is the key to streamlining operations and improving service quality. On-demand platforms, AI-assisted translation tools, and integrated systems allow your team to access the language support they need instantly without waiting on manual processes.

To increase the maturity of your program you would look at things like:

- ✓ **AI-powered translation:** Use AI tools to handle large volumes of document translation quickly. These tools are not suitable for complex or emotional content, but they can still speed up your processes when used with human oversight to maintain accuracy for sensitive healthcare documents.
- ✓ **Workflow automation:** Streamline the scheduling, assignment, and delivery of language services by automating routine tasks for faster response times and fewer administrative burdens.
- ✓ **Multilingual IVRs and chatbots:** Provide self-service options for LEP patients and members in their preferred languages.
- ✓ **Smart call-routing:** Route calls to available interpreters with healthcare expertise.
- ✓ **Omnichannel support:** Integrate call centers with other communication channels (chat, email, apps) for consistent language access.
- ✓ **Video remote interpretation** to allow immediate interpreter access that preserves important visual cues and body language, or offers American Sign Language (ASL) support.
- ✓ **Multilingual patient portals:** Offer digital portals in multiple languages where patients can access medical records, appointment information, and care instructions in their preferred language.

10. The Right Language Services Provider (LSP)

Along the way, healthcare organizations providing language access may have engaged with a variety of translation and interpretation companies. But, working with multiple vendors can get messy. A mature language access program consolidates services with a single, trusted **Language Services Provider (LSP)** who is an expert in language services for healthcare. This simplifies management, guarantees consistency, and makes scaling much easier. When you have one partner handling interpretation, translation, and even tech integration, you can focus on delivering care and service—not managing multiple relationships.



Here's why consolidating with one LSP matters:

- ✓ **Consistency:** When everything is managed under one roof, you get the same high-quality service across the board—whether it's over-the-phone interpretation or written translations.
- ✓ **Simplified management:** One point of contact for all your language access needs means fewer headaches and faster problem-solving.
- ✓ **Scalability:** As your organization grows, a trusted LSP can help you scale your services without compromising quality or speed.
- ✓ **Industry-standard technology:** Partnering with a single LSP gives you access to a cohesive set of tools for all your language access needs. This includes cloud-based translation portals, Translation Memory, and terminology databases—along with any AI-driven solutions for translation or interpretation.
- ✓ **Integrated technology:** One LSP can integrate industry-standard technology with any technology or systems you currently have in place.
- ✓ **Cost efficiency:** Bundling services with a single provider helps reduce overhead and administrative costs, leading to more predictable budgeting and savings over time.
- ✓ **Partnership approach:** Working with a single vendor allows you to build a true collaborative partnership rather than handling projects on a transactional basis. Your vendor can work with you to understand how your business works, then use this knowledge to move your goals forward, anticipate needs and problems, and proactively address them.

05



Optimizing your language access plan



Optimizing Your Language Access Plan

Your ability to serve patients and members in their preferred languages will be limited without a well-developed language access plan. A strong plan doesn't just list the language access services you offer—it creates a system that makes sure the right language support is available when it's needed most.

Your language access plan should include sections for:

- ✓ **A community needs assessment:** which languages does your community require?
- ✓ **Communication touchpoints:** list the interaction points where language services are required.
- ✓ **What language services** will be provided, such as on-demand interpretation, and document translation.
- ✓ **Process:** how services are to be accessed.
- ✓ **Training:** who will be trained and what topics will be covered?
- ✓ **Resources:** who will be providing the services and how to access or schedule them?
- ✓ **Roles and responsibilities** for all team members.
- ✓ **Your KPIs**, such as response times and user satisfaction.

Need more detail? Check out our [Language Access Plan Template](#) for a step-by-step guide to building or improving your plan.

06

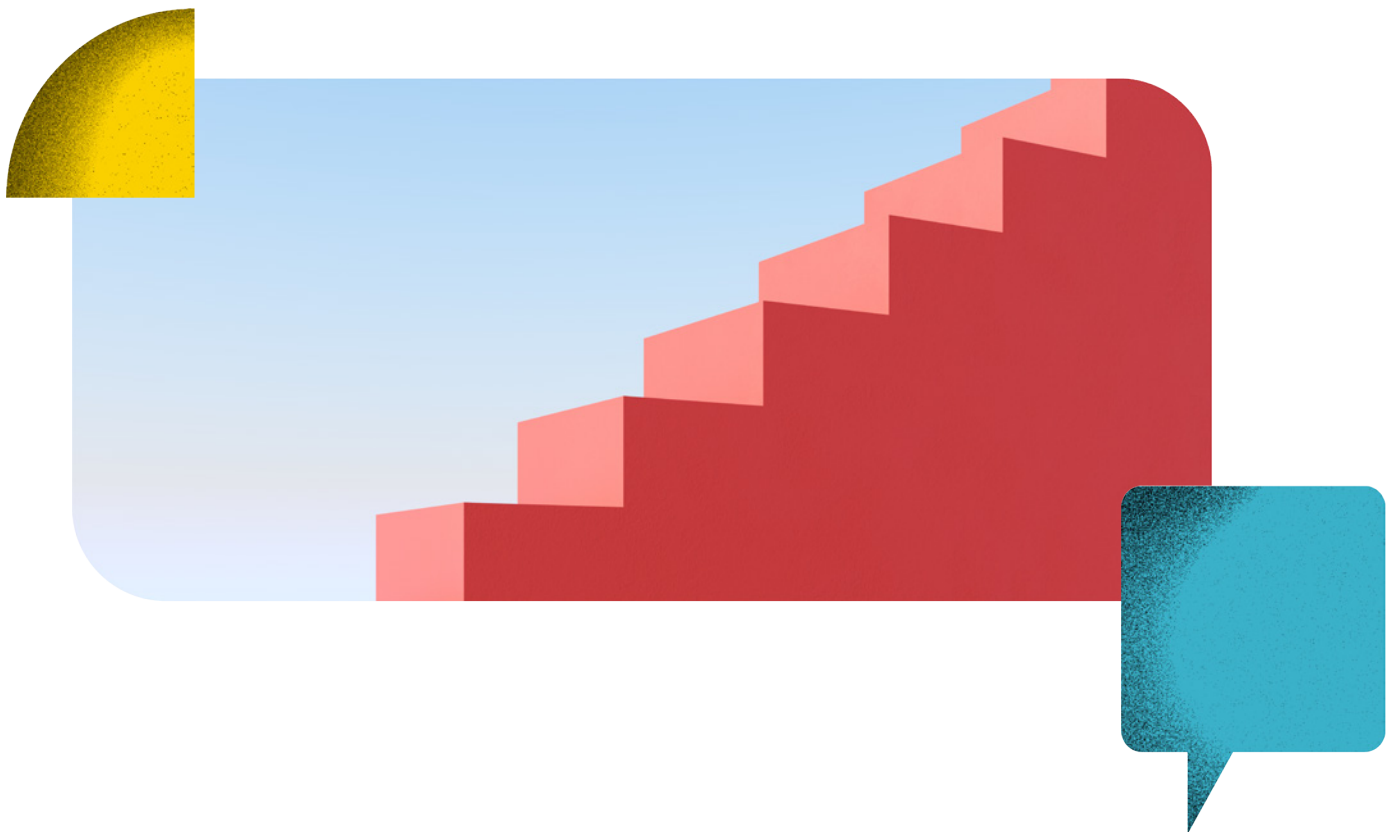
How BIG Language Solutions can help...



How BIG Language Solutions Can Help

When it comes to language access, speed and reliability make all the difference. At BIG, we understand that in healthcare, communication can't wait, compliance is mandatory, and quality cannot be left to chance. That's why we've created solutions that make it easy to connect patients and members with the language support they need—without delays or confusion.

With BIG, you can stop juggling multiple vendors, wondering if you'll get the quality you expect, or waiting around for your provider to understand the unique needs of the healthcare industry. Whether you need on-demand interpretation or scalable document translation, we've got you covered.



What Makes BIG a Partner You Can Rely On?

At BIG, we take the complexity out of managing language services so you can focus on what matters most—delivering exceptional care and service.



No More Waiting

We understand that every second counts in healthcare and that language access should never slow your organization down.

That's why we provide:

Speedy deployments: Due to our in-depth understanding of healthcare and our strong network of highly qualified translators and interpreters in over 300 languages, we can build and deploy a language access program very quickly for you.

Minimal wait times: Our over-the-phone interpretation (OPI) service connects you to a qualified interpreter in just 20 seconds.

Fast, reliable access to interpreters with OPI: Our network of interpreters is available 24/7/365.



No More Wondering

Language services in healthcare demand a higher level of expertise. You shouldn't have to wonder if the community you serve is getting the correct information in a timely fashion, or if their data is being handled in a compliant fashion, or if the interpreter understands the difference between a "negative" test result and a "bad" test result. With over four decades of experience serving the healthcare industry, our team understands your business needs. Likewise, our interpreters and translators are experienced in medical terminology and healthcare settings. Whether it's a critical diagnosis or a sensitive member inquiry, we bring specialized knowledge to ensure clarity and accuracy in every interaction.

No More Workarounds

Our technology and processes adapt to you, not the other way around. Take advantage of integrated service offerings and one point of contact for smoother, more efficient workflows. With BIG Language Solutions, everything—from real-time interpretation to document translation—is handled through one central team. You'll have one single point of contact who intimately knows your account, making it simple to track progress, manage requests, ensure you're always in compliance, and meet the language access needs of your constituents.

Trust Every Word™



Process and challenges shouldn't slow you down. Questions about compliance shouldn't baffle you. Reliability and qualification of resources should not weigh heavily on your mind. With **BIG Language Solutions**, you get fast, high-quality, and reliable services that fit right into your workflow—so you can focus on what matters most: delivering the best care and service. You can, literally, trust that every single word will meet compliance and customer expectations. Say goodbye to waiting, wondering, and workarounds and hello to language solutions that work for you.

[Contact us](#) today to learn how we can take your language access program to the next level.

biglanguage.com
info@biglanguage.com
+1 404.500.4251



linkedin.com/company/big-language-solutions