



# Language access plan

2025

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# Language access policy and standards

## Purpose

The purpose of this Language Access Plan (LAP) is to establish guidelines and outline implementation strategies that ensure meaningful access to programs and services for all customers who communicate in languages other than English.

This LAP was created by a workgroup of Washington Health Benefit Exchange (Exchange) staff and developed with involvement from the Health and Equity Technical Advisory Committee (TAC) and other stakeholder groups. State-agency partners, including Washington State Health Care Authority (HCA), Department of Social and Health Services (DSHS) and Office of the Insurance Commissioner (OIC), were consulted to promote interagency alignment on language access policies and procedures.

## Policy statement

Washington Health Benefit Exchange will take reasonable steps to ensure meaningful access to programs or services for all customers, regardless of their ability to communicate in the dominant language or their command of the dominant culture. Such programs and services include the Washington Healthplanfinder web portal, the Customer Support Center (CSC), the appeals program and the navigator program.

This policy is based on the principle that it is the Exchange's responsibility to ensure effective communication and address potential obstacles related to a person's English proficiency. Accordingly, the Exchange will take reasonable steps to design, implement and publicize the availability of culturally and linguistically accessible programs and services at no cost to customers.

## Standards

The guidelines outlined in this document are consistent with applicable federal and state civil rights laws and regulations intended to protect the rights of people with non-English language preference (NELP) (e.g., Title VI of the Civil Rights Act of 1964 and the Washington Law against Discrimination). Additionally, guidelines are consistent with language access standards for state-based Exchanges as in Section 1557 of the Affordable Care Act and implementing regulations. 42 U.S.C. 18116. The Office of Civil Rights (OCR) enforces Section 1557, which prohibits discrimination based on race, color, national origin,

age, disability or sex. 42 U.S.C. 18116. Section 1557 requires reasonable steps be taken to provide meaningful access to people with NELP. Covered entities, including the Exchange, must post notices of nondiscrimination and taglines that alert people with limited English proficiency to the availability of language assistance services. Taglines must be posted in at least the top 15 non-English languages spoken in the state in which the entity is located. Covered entities are also encouraged to develop and implement a language access plan.

In 2024, the OCR promulgated new implementing regulations for Section 1557 (titled Nondiscrimination in Health Programs and Activities, 89 Fed. Reg. 37,522 [May 6, 2024] “2024 Final Rule”). The 2024 Final Rule requires covered entities to implement policies and procedures to ensure compliance with the rule. Covered entities must have policies for providing language assistance services for people with NELP. Covered entities are also required to train their staff on these policies and procedures. The 2024 final rule was effective July 5, 2024. The table below details the relevant new requirements and compliance timeframes.

<b>Section 1557 Requirement and Provision</b>	<b>Date by which covered entities must comply</b>
§ 92.7 Section 1557 Coordinator	Within 120 days of effective date.
§ 92.8 Policies and Procedures	Within one year of effective date.
§ 92.9 Training	Following a covered entity’s implementation of the policies and procedures required by § 92.8, and no later than 300 days of effective date.
§ 92.11 Notice of Availability of Language Assistance Services and Auxiliary Aids and Services	Within one year of effective date.
§ 92.10 Notice of Nondiscrimination	Within 120 days of effective date.

- 45 CFR §155.205: Requires that information be provided to applicants and enrollees in plain language and in a manner that is accessible and timely to NELP individuals through the provision of services at no cost to the individual, including (i) oral interpretation; (ii) written translations; (iii) taglines in non-English languages indicating the availability of language services; and (iv) website translations.
- 45 CFR §155.210: Requires that navigators provide information in a manner that is culturally and linguistically appropriate to the needs of the population being served by the Exchange, including individuals with limited English proficiency.
- 45 CFR 155.230: Requires that all applications, forms and notices, including the single, streamlined application, conform to the accessibility and readability requirements in 45 CFR §155.205. It also requires the Exchange to re-evaluate the appropriateness and usability of applications, forms and notices.

## Guidelines and implementation

### Needs assessment

The Exchange strives to design and offer culturally and linguistically appropriate services. To that end, the Exchange conducts needs assessments to identify gaps between current state and the desired effectiveness of language access initiatives and to inform prioritization or any updates to policies and procedures.

#### **Guideline:**

The Exchange will perform periodic needs assessments to collect data on:

- Trends or changes relating to prevalent languages in the service area;
- Use, effectiveness and quality of existing language assistance services;
- Points of contact and types of interactions in which customers access services; and
- Culturally specific needs identified by stakeholders in the community.

The scope and method of implementation will be subject to available Exchange and community resources. Findings will be shared with the Health Equity TAC and other interested stakeholders.

#### **Implementation:**

- Initial assessment of the Exchange's critical public interface mechanisms — such as marketing and outreach, face-to-face and over-the-phone customer service, Washington Healthplanfinder and the Exchange websites, incorporated information from various sources including customer surveys, navigator surveys, referrals/complaints and a self-assessment tool developed by a federal agency.
- Following open enrollment each year, designated staff members solicit feedback from staff, vendors and account workers who use language assistance resources to communicate with customers. This feedback is shared with the language access team to evaluate if existing language services are easy to access and satisfactorily meeting the needs of customers with limited English proficiency.
- The language access team supports ongoing collaboration with:
  - Customer Support Center stakeholders to track and analyze interpreting service use and in-language encounters with bilingual/multilingual staff members. Tracking metrics are used to assess the need for added language

access resources such as additional bilingual/multilingual customer support staff.

- Appeals program stakeholders to track and analyze interpreting service use.
- Navigator and broker program stakeholders to track changing community needs and identify areas where language access support is needed.
- Data experts to track and analyze internal and publicly available race, ethnicity and language data.
- Partner agencies and community stakeholders for visibility of culturally specific barriers to access and language needs that may not be evident in conventional sources of data.
- Digital content creators, website accessibility experts and user experience (UX) designers to track how customers who communicate in languages other than English interact with translated digital content and Exchange websites.
- Delivery team members to understand the Washington Healthplanfinder experience for customers who navigate the Spanish version of the application.
- Enrollment team members for support with communication needs for specific customers.
- Conditional Eligibility Verification (CEV) team to support document requests and reviews.

## **Language identification**

Customer-facing staff and vendors should make reasonable efforts to determine whether a person needs language assistance. This can be accomplished in several ways:

- Self-identification by the person with NELP or companion (if preferred language is not identified, inquire as to the primary language).
- Asking a multilingual staff or qualified interpreter to verify a person's primary language.
- Using an "I Speak" card, poster or other type of language identification tool. Washington Healthplanfinder offers language identification tools for assisters and customers including branded "I Speak" cards in 27 languages.
- All customers who choose to complete an application through Washington Healthplanfinder can select their language preference and their need for spoken, sign and written language assistance.

## Language assistance services

The Exchange strives to provide culturally and linguistically appropriate spoken, sign and written language assistance to customers at no cost. To that end, the Exchange ensures that necessary resources are available to help current and potential customers who communicate in languages other than English including direct “in-language” communication, interpreting services and translated materials.

## Spoken and sign language assistance

### **Guideline:**

The Exchange will provide face-to-face, virtual and telephonic language assistance by using:

- Direct “in-language” communication provided by qualified bilingual/multilingual staff, customer support representatives and navigators.
- Interpreter services provided by certified and qualified interpreters. Services may be prescheduled or accessed on-demand. Services may be provided in-person or remotely via video or telephonic conference.

The Exchange takes reasonable steps to ensure that all staff or contracted personnel providing in-language spoken and sign language assistance are competent to do so. Competency may be determined through demonstrated proficiency in and ability to communicate information accurately in both English and the other language; identifying and employing the appropriate mode of interpreting; communicating fluently in the target language; and understanding and adhering to their role as interpreters, translators or bilingual/multilingual staff. Specifically:

- Bilingual/multilingual staff providing direct in-language services at the CSC undergo spoken and written language assessments by an established and reputable language testing and certification program (such as Kenexa Assess, Alta Language Services or the Department of Social and Health Services language testing and certification program). Bilingual supervisors and quality assurance staff monitor and support bilingual/multilingual CSC staff.
- Bilingual/multilingual navigators providing direct in-language services on behalf of Navigator Lead Organizations are qualified to do so through assessment processes deemed adequate and carried out by said Navigator Lead Organizations.<sup>1</sup>

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<sup>1</sup> [45 CFR 155.210](#)

- Telephonic interpreters are *LanguageLine Certified*<sup>SM,2</sup>

### **Implementation:**

- Customers indicate their preferred spoken/sign language and request interpreter services at encounters with Exchange staff and account workers and when they complete an application or request an appeal.
- The language access team works with Exchange stakeholders to support availability of spoken and sign language services for all customer-facing staff and account workers.
- The CSC offers six interactive voice response (IVR) language options to improve the experience of callers in need of spoken language assistance. Language-specific IVR options are posted on the Exchange's language support webpages.<sup>3</sup>
- The CSC offers on-demand interpreter services in over 200 languages for callers in need of spoken language assistance. It also contracts and manages the interpreter services provider.
- The CSC offers direct in-language communication in up to five languages for callers in need of spoken language assistance.
- The CSC uses video relay and TTY services to communicate with callers who are deaf or hard of hearing.
- CSC staff, Exchange account workers and appeals staff can access on-demand interpreter services and receive training on how to work with interpreters.
- Bilingual/multilingual navigators and brokers assist customers directly in their preferred language.

## Written language assistance

### **Guideline:**

The Exchange must take reasonable steps to provide people with NELP with meaningful access to written translation services at no cost. These written translations must be accurate and timely. Specific requirements include:

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<sup>2</sup> <https://www.language.com/interpreter-quality>

<sup>3</sup> <https://www.wahealthplanfinder.org/us/en/tools-and-resources/how-to/language-support.html>

- The inclusion of taglines on “critical” website content and documents that indicate the availability of language services in the top 15 languages spoken by the state’s NELP population; and
- The translation of website content intended for applicants and enrollees into a non-English language when the NELP population speaking that language comprises 10% or more of the state’s population.

### **Implementation:**

The Exchange uses the Washington State Written Translation Contract #04218, managed by Department of Enterprise Service (DES), to meet most written translation needs. Professional translators may also be contracted directly for special projects if they meet one or more of the following criteria:

- A professional degree or certificate in translation in the required language combination.
- A translation certification issued by a professional translation association such as the American Translators Association (ATA) or other organization such as DSHS in the required language combination and direction, when available.
- When certification is not available in a specific language combination and direction required (e.g., English to an Indigenous language), other minimum requirements can be used to assess qualification, including years of experience, references from people who are qualified to attest to the quality of their work, etc.
- Machine translation or other applications designed to convert written text from one language to another will not be used without the involvement of a professional translator.
- Customers indicate their preferred written language at encounters with Exchange staff and account workers and when they complete an application or request an appeal. Written language preference is recorded and informs the language in which a customer’s written information is provided.
- The language access team coordinates and oversees translation needs and manages partnership and collaboration with contracted translation providers.
  - Translation project management involves receiving internal requests and managing timeline expectations, preparing source documents for optimal translation, ensuring that the translation process meets Exchange standards, coordinating graphic design or desktop publishing tasks and updating records and location of translated materials.
  - The translation process prioritizes translation quality and safeguards private or identifying information.

- The Exchange translates critical correspondence or documents into the eight most common languages other than English (Cambodian, Chinese (Simplified), Korean, Laotian, Russian, Somali, Spanish and Vietnamese). These languages comprise 5% of the population or 1,000 people in a service area, whichever is less.<sup>4</sup>
- Appendix B lists current critical materials available in languages.
  - Classification of a document as “critical” depends on the importance of the program, information, encounter, or service involved and the consequence to the person with NELP if the information in question is not provided accurately or in a timely manner. The determination of what documents are considered “critical” is left to the discretion of the Exchange. The Exchange is guided by applicable legal standards in making decisions as to translation. Stakeholder input and available data are also used. Critical documents may include, but are not limited to:
    - Application for health insurance<sup>5</sup>
    - System-generated Washington Healthplanfinder correspondence
    - Appeals request form and procedural rules
    - Notices on the availability of free language assistance (also called taglines)
    - Documents that require a signature or response from the customer
- The Exchange ensures all customer-facing documents include taglines in the top 15 languages spoken within Washington informing customers of the availability of language assistance at no cost to customers.
- Subject to available Exchange resources, critical correspondence or documents may be translated into languages other than the eight core languages.
- The Exchange provides Washington Healthplanfinder content and the digital application in English and Spanish. Additionally, the Exchange follows usability and testing processes to ensure website accessibility and accuracy.<sup>6</sup>

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<sup>4</sup> <https://www.justice.gov/sites/default/files/crt/legacy/2010/12/14/DOJFinLEPFRJun182002.pdf>

<sup>5</sup> Paper applications are available in 15 languages at: Apple Health (Medicaid) Forms (18-001P): [hca.wa.gov/apple-health-client-forms](http://hca.wa.gov/apple-health-client-forms); to facilitate access, the Exchange’s language support webpage provides links to the various translated versions of the application.

<sup>6</sup> Usability testing is part of the Exchange system design process. Customers help test new, upcoming features for Washington Healthplanfinder, including textual changes. Feedback from consumer testing is used to improve system design. Stakeholders are broadly engaged to help recruit testers.

- The Exchange collaborates with HCA on an “unsupported language” process that identifies critical documents addressed to customers whose preferred language does not meet core language criteria. The unsupported language process ensures that critical documents are available in Safe Harbor languages.
- The Exchange collaborates with community partners to translate health literacy and outreach materials for shared customers.
- Translated health insurance literacy and outreach materials are available in digital format on the Exchange’s language support webpages<sup>7</sup> for the following languages:
  - English
  - American Sign Language
  - Amharic
  - Arabic
  - Chinese (Simplified)
  - Chinese (Traditional)
  - Dari
  - Farsi
  - French
  - German
  - Hindi
  - Japanese
  - Cambodian (Khmer)
  - Korean
  - Lao
  - Oromo
  - Pashto
  - Portuguese
  - Punjabi
  - Romanian
  - Russian
  - Somali
  - Spanish
  - Tagalog
  - Tigrigna
  - Ukrainian
  - Vietnamese

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<sup>7</sup> <https://www.wahealthplanfinder.org/us/en/tools-and-resources/how-to/language-support.html>

- Exchange staff may request the translation of materials as needed. Translation requests may be submitted and tracked by requestors on a project management platform.
- The Exchange appeals program provides translated documents into an appellant's preferred language upon request and provides an interpreter during the appeal process.
- The Customer Support Center offers in-language chat services with Spanish and English-speaking CSRs.
- Bilingual/multilingual account workers might translate information that is not readily available in the customer's preferred language as needed.

## Notices

The Exchange strives to encourage current and potential customers to access programs and services as needed, regardless of English proficiency. To that end, the Exchange informs customers of culturally and linguistically appropriate resources available at no cost to them.

### **Guideline:**

The Exchange will inform the availability of various forms of assistance for current and potential customers who communicate in languages other than English. Methods of notification could include:

- Multilingual posters, signs and brochures
- Informational material distributed to the public in electronic formats such as what is available on the Exchange's websites
- Taglines
- Written documents

The Exchange makes notification resources available to customer-facing contractors and vendors as they are created.

### **Implementation:**

- The Exchange maintains updated language support webpages<sup>8</sup> with information in 27 languages on how to access and use language assistance services. Information includes that:

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<sup>8</sup> <https://www.wahealthplanfinder.org/us/en/tools-and-resources/how-to/language-support.html>

- Customers have a right to access programs and services regardless of their preferred language.
- Language assistance is available at no cost to customers.
- Customers may use tools like “I Speak” cards to request language assistance.
- Language assistance is available at the CSC and the language option/extension to dial per language.
- Language assistance is available through navigators and brokers and how to find a navigator or broker who speaks the preferred language.
- The Exchange maintains an updated appeals program webpage<sup>9</sup> that includes information on how appellants can access interpreting services or special accommodations.
- The Exchange also leverages ethnic and social media to increase awareness and use by people with NELP regarding Exchange programs, activities, language assistance services and products available in non-English languages.
- The Exchange has launched several multilingual campaigns, incorporating translated emails, transcreated materials and other multilingual assets.

## Training and resources

The Exchange strives to empower staff members to provide culturally and linguistically appropriate services. To that end, Exchange staff, assisters and account workers receive training and resources on language access best practices.

### **Guideline:**

The Exchange will facilitate language access training and resources to empower staff and account workers with the awareness, knowledge and confidence to serve all current and potential customers regardless of language preferences.

Topics covered in language access training and resources include:

- Impact of offering meaningful language assistance services;

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<sup>9</sup> <https://www.wahbexchange.org/contact-us/appeals/>

- Available resources and best practices for communicating with NELP customers, including what to expect when working with interpreters and where to find translated materials;
- Current language access policies and procedures; and
- Data collection best practices for capturing language needs and preferences.

The Exchange has the discretion to determine the nature, form and frequency of language access training and other ongoing training provided to staff.

### **Implementation:**

- The Exchange recognizes that meeting equity and language access goals requires a collective effort. To that end, every staff member, regardless of customer-facing job expectations, participates in the following trainings:
  - New employee orientation modules on cultural humility and foundations of diversity, equity and inclusion.
- Managers at the Exchange make reasonable efforts to enforce language access policies and procedures, monitor effectiveness and support staff with additional training as needed.
  - All departments take reasonable steps to develop quality control procedures to ensure that staff who communicate or correspond directly in-language do so in an accurate and competent manner.
  - For policies and procedures to be effective, managers should take reasonable efforts to ensure that new and existing Exchange staff who interact with people with NELP periodically receive training on: the content of the Language Access Plan and related policies and procedures; identifying language access needs; and, providing language assistance services to people with NELP.
- The Exchange collaborates with the Health Equity TAC and interested community partners to create resources for customer-facing staff and vendors who coordinate language assistance services. Resources cover the following topics:
  - How to identify language needs;
  - How to work with telephonic or in-person interpreters;
  - How to request translation of documents; and
  - Best practices for assisting people who communicate in languages other than English.
- The Exchange recognizes and values that all services provided directly in the customer's preferred language are more efficient and equitable, and that without

the skillful contributions of bilingual/multilingual staff and account workers, in-language communication would not be possible for customers who communicate in languages other than English.

- Qualified bilingual/multilingual customer service representatives receive customized support and Quality Assurance monitoring as well as pay incentives for use of their language skills to perform job tasks for the Exchange.
- Multilingual Exchange employees with frequent interaction people with NELP or whose job description includes the provision of language assistance services will undergo spoken and written language proficiency assessments by an established and reputable language testing and certification program (such as, Kenexa Assess, Alta Language Services or the Department of Social and Health Services language testing and certification program).
  - Each department should maintain a list of certified multilingual staff.

## Assessment and accountability

The Exchange strives to monitor the effectiveness of the Language Access Plan and update policies and procedures accordingly to ensure that programs and services are continuously offered in ways that are culturally and linguistically appropriate. To that end, the Exchange analyzes internal and external data and engages with internal and external stakeholders, including Exchange customer complaints.

### **Guideline:**

The Exchange will monitor, evaluate and update language access plans, policies and procedures to ensure meaningful access to programs and services for all current and potential customers regardless of language preferences.

### **Implementation:**

- The Exchange continuously tracks internal and external language access metrics, including:
  - Self-reported data on Washington Healthplanfinder;
  - Customer service metrics including:

- The number of customers who request spoken or sign language assistance and their preferred languages.
- The number of customers who request written language assistance and the preferred languages.
- Equity-related benchmarks established by the Health Equity TAC;
- Publicly available data on community demographics and needs; and
- Feedback solicited from customers, staff, vendors, account workers and other stakeholders.
- At least once every two years, the Exchange reassesses and, where appropriate, updates the Language Access Plan to ensure that the scope and nature of language assistance services provided reflect updated information on relevant populations, language assistance needs and changes in technology.
- Twice per year, the Exchange aggregates data and publishes enrollment reports<sup>10</sup> with self-reported customer language preferences and other relevant data, including:
  - CSC data on customer interactions with bilingual/multilingual customer service representatives and telephonic interpreter services.
- The Exchange has a process for customers to submit concerns, complaints or issues related to language access, including a point of contact for facilitating resolution.
  - The Exchange reviews and addresses feedback and complaints received from people with NELP and interested stakeholders with respect to language assistance services and products provided by the Exchange in a timely manner.
  - Language access-related feedback, complaints and improvements are regularly shared with the Health Equity TAC.
- The Exchange continuously works with the Health Equity TAC, the Interagency LEP Workgroup and other interested stakeholders to identify promising practices with respect to negotiating and securing high-quality language assistance services.
  - The Exchange convenes the Health Equity TAC to provide expertise, experience and professional perspectives on language access, health

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<sup>10</sup> Enrollment reports with language access related metrics are available at:  
<https://www.wahbexchange.org/about-the-exchange/reports-data/enrollment-reports-data/>

literacy, hard-to-reach populations, cultural sensitivity and other general access to coverage issues.

- The Exchange participates in inter-agency groups and collaborates with language access staff at DSHS, HCA, OIC and at other agencies to identify common language access issues, identify best practices and align policies.
- In applicable contracts, the Exchange explains legal and program language requirements and makes reasonable efforts to ensure that requests for proposals or contracts for language assistance service providers establish adequate quality control process for all deliverables.

## Recent projects

The following recent initiatives reflect the Exchange's ongoing commitment to ensuring that all customers, regardless of their language preference, have meaningful access to programs and services. By continuously improving and adapting to the evolving needs of the community, the Exchange aims to promote health equity and reduce barriers to care for all current and potential customers.

### Completed

- In 2023, the Exchange contracted the services of Upstream for a third-party assessment of the current state and their professional recommendations to advance equity, including language access initiatives.
- Starting in 2024, customer surveys are being offered in multiple languages including the OE12 Annual Customer Survey which was available in English and in Chinese (Simplified), Korean, Punjabi, Russian, Spanish, Ukrainian and Vietnamese.
- In the fall of 2024, the Exchange developed landing pages to direct customers to content in their preferred language during open enrollment. These languages included Chinese (Simplified), Korean, Russian, Spanish, Ukrainian and Vietnamese.
- The Exchange contracted a backup language service to expand access to languages of lesser diffusion including Central and South American Indigenous languages.
- The Exchange completed the procurement of specialized Computer Aided Translation (CAT) software. Software implementation is underway.
- Exchange staff completed diversity, equity and inclusion micro-learning sessions designed by Upstream.
- The Exchange tailored language access presentations for the board, leadership team, call center stakeholders and all staff to illustrate the experiences of people who do not communicate in the dominant language when seeking health-related services in the U.S.

### In Progress

- The language access team worked with stakeholders at HCA to assess whether the language preference options listed on Washington Healthplanfinder effectively represented the languages of Washington residents. The assessment discovered that several languages such as Mam, Marshallese and Nepali were not available language options, and various existing language options required updates. Efforts

are underway to update the language options so that more customers are able to find their preferred language on the list.

- The Exchange approved a project to expand core languages and provide critical documents in the following eight additional languages: Amharic, Arabic, Dari, French, Portuguese, Punjabi, Tigrigna and Ukrainian.
- The Exchange approved a project to develop a translation term bank and style guide for core languages.
- The Exchange contracted directly with local professional translators to improve the accuracy of the Spanish version of the application.
- The Exchange is in the process of growing its language access team to include a language access coordinator. This new position will grow the Exchange's investment in language access and allow the work to expand.

## Appendix A: Language access resources

### Washington State:

- Governor's Interagency Council on Health Disparities:  
<http://healthequity.wa.gov/TheCouncilsWork/LanguageAssistance.aspx>
- Washington State Coalition for Language Access, Multilingual Consumer Health Resources:  
<http://www.wascla.org/>
- Northwest Justice Project, Language Access & LEP Advocacy videos:  
<http://www.youtube.com/playlist?list=PLEDBA3D39A7D52DBD&feature=plcp>
- The Cross-Cultural Health Care Program (CCHCP):  
<http://xculture.org/resources/>

### National:

- Limited English Proficiency (LEP) Resources:  
<http://www.lep.gov/>
- Federal Plain Language Guidelines:  
<http://www.plainlanguage.gov/howto/guidelines/index.cfm>
- The Interagency Language Roundtable (ILR):  
<http://www.govtilr.org/>
- National Action Plan to Improve Health Literacy:  
<http://www.cdc.gov/healthliteracy/>
- Office of Minority Health, HHS Action Plan to Reduce Racial and Ethnic Health Disparities:  
<http://minorityhealth.hhs.gov/npa/>
- Office of Minority Health, Think Cultural Health National CLAS Standards Cultural and Linguistic Policy and Education Initiatives:  
<https://www.thinkculturalhealth.hhs.gov/>
- Health Literacy Tools:  
<http://www.health.gov/communication/literacy/#tools>
- Health Literacy Studies:  
<http://www.hsph.harvard.edu/healthliteracy/>

## Appendix B: Materials available in nine languages

The following materials are currently available in English, Cambodian, Chinese (simplified), Korean, Laotian, Russian, Somali, Spanish and Vietnamese:

Document Type	Description
Correspondence	Contact Information Updated
Correspondence	Password Expiring
Correspondence	Individual/Employee Email Notification
Correspondence	In Person Help Update
Correspondence	Important Deadline to Submit Information
Correspondence	Enrollment Deadline for Coverage
Correspondence	Complete Your Application
Correspondence	WA Apple Health Information Request
Correspondence	WA Apple Health Renewal
Correspondence	WA Apple Health Renewal Action Required
Correspondence	WA Apple Health Denial
Correspondence	WA Apple Health Termination
Correspondence	Coverage Termination
Correspondence	Important Information
Correspondence	Eligibility Results
Correspondence	Time to Renew Coverage
Correspondence	Plan Selection Confirmed
Correspondence	Address Update Needed
Correspondence	Important Account Information
Appeal	Acknowledgement Notice and Scheduling Order
Appeal	Required Appeal Rights Information

Appeal	Withdrawal Request Form
Appeal	Request an Appeal
Appeal	Request for Review of Dismissal
Appeal	Procedural Rules
Outreach	Citizenship and Immigration Eligibility Chart
Outreach	Customer Support Resources
Outreach	Quick Reference Guide for Immigrants and Refugees
Outreach	Road Map to Health
Outreach	User's Guide to Key Terms

## Appendix C: Definitions

Terminology	Definition
Applicant Customer	Any person who asks about or submits an application on Washington Healthplanfinder.
Account worker	<ul style="list-style-type: none"> <li>• Brokers</li> <li>• Certified Assister Coordinators (in clinics)</li> <li>• CSC (contractor call center)</li> <li>• Navigators</li> <li>• Tribal Assister Coordinators</li> </ul>
Bilingual/multilingual staff	<p>A staff member who has advanced proficiency in English and at least one other language and has knowledge of and experience with specialized terminology necessary for meaningful communication.</p> <p>Bilingual/Multilingual staff should not interpret or translate unless they have separately met the requirements of being a qualified interpreter or translator.</p> <p>Bilingual/Multilingual staff must be given clear roles and expectations regarding whether they are performing their job duties in-language or serving as qualified interpreters or translators.</p>
Broker	State licensed insurance sales professional responsible for assisting Applicant Customers to find and select plans available through the Exchange.
Critical document Necessary document Vital document	<p>Written content that must be completed and/or understood in order to:</p> <ul style="list-style-type: none"> <li>• access or participate in a program, service, or activity;</li> <li>• not be terminated from a program, service, or activity;</li> </ul>

	<ul style="list-style-type: none"> <li>• prevent significant financial, physical, or other harm.</li> </ul>
Customer Support Center (CSC)	Department responsible for providing customer support and resolving customer inquiries, issues or complaints.
Direct “in-language” communication	Monolingual communication between bilingual/multilingual staff and a customer (e.g., Korean to Korean).
Effective communication	Communication that is the result of an organization's reasonable steps to design, implement and publicize the availability of culturally and linguistically accessible programs and services.
Health Equity Technical Advisory Committee	Committee that offers expertise, experience and professional perspectives on health equity for the Exchange.
Interactive Voice Response (IVR)	Technology that allows telephone users to interact with a telephone system through the use of voice and keypad.
Interpretation	The act of listening, understanding, analyzing and processing spoken or signed communication in one language and faithfully verbally translating it, in real time, into another spoken or signed language while keeping the same meaning.
Language access Language assistance	Services and resources provided to ensure people with NELP can effectively communicate and access programs and services.
Language assistance team	People and stakeholders who collaborate to ensure language assistance services are effectively provided to customers with NELP.

Language identification tools	Resources used by customer-facing staff and service provider to determine whether a person needs language assistance.
Non-English language preference (NELP) Limited English Proficiency (LEP)	A person whose preferred language is not English and requires language assistance services to effectively communicate and access programs and services.
Meaningful access	Language assistance that results in accurate, timely and effective communication at no cost to people with NELP.  Meaningful access denotes access that is not significantly restricted, delayed or inferior as compared to programs or activities provided to people who are English-proficient.
Navigator	A private or public entity or person that is qualified, and licensed, if appropriate, to engage in the activities and meet the standards described in <a href="#">§ 155.210</a> .
Plain Language	Writing and design ensures information is easy to translate and supports accessibility efforts for people who use screen readers, captioning tools or other accessibility and language access tools (as defined in <a href="#">Executive Order 23-02</a> ).
Preferred language Primary language	The language that people identify as the preferred language that they use to communicate effectively.
Qualified interpreter or translator	A bilingual/multilingual person who has the appropriate training and experience or demonstrated ability to fully understand, analyze and process and then faithfully render a spoken, written, or signed message in one language into a second language and who abides by a code of professional practice and ethics.
Sight translation	Rendering material written in one language into a different spoken or signed language.

Sign language	Languages that people who are deaf or hard of hearing use in which hand movements, gestures and facial expressions convey grammatical structure and meaning.
Tagline	Brief message that may be included in or attached to a document in languages other than English that describes how people with NELP can obtain a translation of the document or an interpreter to read or explain the document.
Telephonic interpreter services Over-the-phone interpreting (OPI)	Communication that takes place on a three-way phone call between two parties and an interpreter.
Core language	<p>Languages identified based on historic demographic data as requiring special attention or services. (Cambodian, Chinese [Simplified], Korean, Laotian, Russian, Somali, Spanish and Vietnamese)</p> <p>WAHBE is updating the list to include additional languages based on current demographic data. Amharic, Arabic, Dari, French, Portuguese, Punjabi, Tigrigna and Ukrainian.)</p>
Translation	The process of converting written text from a source language into an equivalent written text in a target language as fully and accurately as possible while maintaining the style, tone and intent of the text, while considering differences of culture and dialect.
Safe Harbor Provision	Department of Justice provision which recommends translating vital information into every language that is used by 5% of the population or 1,000 people (whichever is less). The Washington Office of Financial Management produces these estimates at both the state and county level.

## Appendix D: Historical overview

In Washington state, the population of people with non-English language preference (NELP) has grown 210% since 1990 and now comprises over half a million residents.<sup>11</sup> This group is more prone to health disparities than their English-speaking counterparts and less likely to have insurance, seek regular medical care or follow medical instructions, resulting in a higher incidence of emergency room visits and other safety net options.

In December 2012, staff at Washington Health Benefit Exchange (Exchange) held a series of meetings with language justice stakeholders to inform the development of policies and procedures for the Exchange, recognizing the effect of language barriers on accessing insurance coverage and care.

In January 2013, staff briefed the Exchange Board on how people with NELP could access programs and services during the inaugural open enrollment period. The following initiatives were proposed:

- Washington Healthplanfinder would be accessible in English and Spanish;
- The application and customer correspondence would be accessible (in hardcopy and online formats) in nine core languages: English and Cambodian, Chinese [Simplified]), Korean, Laotian, Russian, Somali, Spanish and Vietnamese;
- Taglines would be provided in prevalent languages to indicate the availability of language services at no cost;
- A Correspondence and Translation Manager would be responsible for planning, managing and implementing translation and printing business processes;
- Telephonic interpretation services managed by third party would be available to Customer Support Center (CSC), Appeals and Exchange account workers; and
- NELP customers would be able to search for certified navigators and brokers by language spoken.

In February 2013, the Exchange Board established the Health Equity Technical Advisory Committee (TAC) to offer expertise, experience and professional perspectives on health equity for the Exchange. The focus of this TAC is language access, health insurance literacy, cultural sensitivity, hard-to-reach populations and general access to coverage issues. The TAC began discussing language access priorities and developing a plan shortly thereafter. Exchange staff received the TAC's initial recommendations in July 2013, which

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<sup>11</sup> source

guided the creation of the Language Access Plan (LAP). The plan was first published in September 2014 and is updated every two to four years.

As language access needs evolved, the Exchange separated language access and correspondence responsibilities and created a dedicated role for language access initiatives. In October 2023, a Language Access Manager was hired to spearhead language assistance programs and services.