



Department of Managed Health Care

State of
California

Award # 1176156148375 Details

Submit Objection

Proceeding: 2004-0115 Access to Language Assistance (SB853)
Date Requested: 4/9/2007 3:02:28 PM
Amount Requested: \$4400

Contribution to the Proceeding: During the months of May through September, 2006, the Health Consumer Center of the Legal Aid Society of San Mateo County devoted extensive time to reviewing the DMHC proposed regulations on access to language assistance, and to drafting comments. We submitted almost four pages of detailed comments on September 18, 2006. Our comments were integrated into the language of the final regulations. Specifically, the focus of the final version of Sec.1300.67.04c2Ci, as compared to the pre-comment draft, places much more of the burden of language services upon the provider, as we had recommended. Our comments on this topic emphasized the importance of taking the burden of seeking language services entirely off the enrollee, and instead requiring plans to affirmatively offer services regardless of whether the enrollee arrives with his or her own ad hoc interpreter. The final regulation has also toughened its approach to the required qualifications of interpreters, pursuant to our suggestions. Sec.1300.67.04c2Gvii lays out in detail strict standards for interpreters that do seem to discourage the use of ad hoc interpreters wherever practicable. Furthermore, we note evidence of our comments in the new regulations' approach to enforcement. We had noted that the draft regulations left far too much of the enforcement piece in the hands of the plans themselves, a scenario that simplified noncompliance. By contrast, the final version of Sec.1300.67.04a2-a3 requires more accountability to the DMHC. We are pleased to have contributed substantially to the final regulations and believe the integration of our comments will benefit health consumers in California.

Task Performed

Activity Research
Activity Date 8/7/2006
Amount Billed: \$700
Other Parties Involved: Kavita Narayan

Subject Matter and Work Description: Closely reviewing all prior versions of the proposed regulations and analyzing them based on our research and experience with language access issues among low-income health consumers.

Time Spent: 7 hours

Task Performed

Activity Research
Activity Date 8/8/2006
Amount Billed: \$700
Other Parties Involved: Kavita Narayan

Subject Matter and Work Description: Closely reviewing all prior versions of the proposed regulations and analyzing them based on our research and

experience with language access issues among low-income health consumers.

Time Spent: 7 hours
Task Performed

Activity Letter
Activity Date 8/9/2006

Amount Billed: \$700

Other Parties Involved: Kavita Narayan

Subject Matter and Work Description: Drafting comments on the regulations with specific attention to several topics: the service obligations of the providers and the placing of the burden for provision of language services the appropriateness of the regulations' approach to ad hoc interpretation the role of the interpreter and the plans' accountability to the Department of Managed Health Care.

Time Spent: 7 hours
Task Performed

Activity Letter
Activity Date 8/10/2006

Amount Billed: \$700

Other Parties Involved: Kavita Narayan

Subject Matter and Work Description: Drafting comments on the regulations with specific attention to several topics: the service obligations of the providers and the placing of the burden for provision of language services the appropriateness of the regulations' approach to ad hoc interpretation the role of the interpreter and the plans' accountability to the Department of Managed Health Care.

Time Spent: 7 hours
Task Performed

Activity Letter
Activity Date 8/11/2006

Amount Billed: \$700

Other Parties Involved: Kavita Narayan

Subject Matter and Work Description: Finalizing comments on the regulations with specific attention to several topics: the service obligations of the providers and the placing of the burden for provision of language services the appropriateness of the regulations' approach to ad hoc interpretation the role of the interpreter and the plans' accountability to the Department of Managed Health Care.

Time Spent: 7 hours
Task Performed

Activity Letter
Activity Date 8/15/2006

Amount Billed: \$600

Other Parties Involved: Ivan Trujillo

Subject Matter and Work Description: Reviewing and editing final comment letter.

Time Spent: 4 hours
Task Performed

Activity Letter

Activity Date 9/18/2006
Amount Billed: \$300
Other Parties Involved: Melissa Rodgers
Subject Matter and Work Description: Finalizing letter supervisor
Time Spent: 1 hours

Contact Information

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Date Created 3/21/2006 12:27:42 PM

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