

CareSource Interpreting Services Usage Policy

OH-P-1588 – March 4, 2019

Introduction

CareSource provides its network of providers with access to interpreter services to help make it easier for Limited English Proficient (LEP), deaf, and hard-of-hearing members to get the health care they need, when they need it.

CareSource partners with Vocalink Global to provide language interpreting services throughout Ohio.

Through Vocalink's "Tracker" Interpreting Management System, eligible providers can:

- Confirm member eligibility to receive CareSource-provided interpreting services;
- Schedule interpreting services for CareSource-eligible members' authorized appointments;
- Reschedule and/or cancel appointments;
- Receive notification of changes to member eligibility status; and

Providers may access the CareSource page on the Vocalink website to view information and resources that will help in accessing and successfully using interpreter services: cspage.vocalinkglobal.com. References to Vocalink's website throughout this Usage Policy are to this page.

This Usage Policy governs provider use of CareSource-provided interpreting services. After reviewing and acknowledging the terms and conditions included in this Usage Policy, providers may register with Vocalink to begin scheduling interpreting services directly with Vocalink.

What Types of Interpreting Services Are Available?

On-Site Interpreting ("OSI")

On-site Interpreting, or "OSI," is live, face-to-face interpreting services at the provider's facility. OSI interpreting is available in a number of spoken languages as well as American Sign Language (ASL). Please refer to the language list available on Vocalink's [website](#) for an up-to-date list of language availability.

OSI is typically the first option for CareSource members, with [OPI](#) and [VRI](#) used as backup options for rare languages, remote geographical areas, and other circumstances that result in no on-site interpreter available at a particular date/time/location.

Over-the-Phone Interpreting ("OPI")

Over-the-phone interpreting, or "OPI," uses qualified telephone interpreters, typically on a speaker phone, to facilitate communication between the provider and the member (and/or the member's caregiver). OPI interpreting is available in more than 250 languages. Please refer to the language list available on Vocalink's [website](#) for an up-to-date list of language availability.

OPI is most commonly used as a backup when an on-site interpreter is unavailable. It may be used as a first choice in limited circumstances, discussed in the section, below, entitled "[What](#)

[Terms and Conditions are Applicable to Using CareSource Interpreting Services?](#) Full details on how to use Vocalink's OPI services are available on Vocalink's [website](#).

Video Remote Interpreting (“VRI”)

Video remote interpreting, or “VRI,” uses secured, HIPAA-compliant, live-streaming video technology on a computer, tablet, or smart phone to connect with a qualified interpreter in real time. For spoken languages, VRI is primarily used as a backup to [OSI](#) for those members who have challenges communicating via telephone. It is also the primary backup option for ASL.

VRI requires a strong, stable connection to high-speed internet as well as quality webcam and speaker options. Full technical requirements for successful use of VRI are available at Vocalink's [website](#).

Which CareSource Plans Are Included?

Vocalink interpreting services are available under the following CareSource plans:

- CareSource Ohio Medicaid
- CareSource Ohio MyCare
- CareSource Ohio Medicare

Which Providers Are Eligible to Use Interpreting Services?

All active CareSource providers are eligible to schedule interpreters for authorized appointments.

Where Are Interpreting Services Available?

OSI

Spoken language and ASL on-site interpreting services are available in most places across the state of Ohio, including the following primary regions:

- Columbus
- Springfield
- Cleveland
- Toledo
- Akron/Canton
- Dayton
- Cincinnati

Outside of these areas, OSI availability is more limited. Contact Vocalink directly to discuss on-site needs outside of these areas. 877/492-7754

OPI and VRI

OPI and VRI services are available throughout Ohio.

Which Members Are Eligible for Services?

All active members of the CareSource plans referenced above are eligible to receive interpreting services through CareSource.

What Types of Appointments Are Covered for Interpreting Services?

CareSource offers interpreting services for eligible members for covered medical, dental, and vision appointments outside the hospital setting. Note that hospitals are required to provide interpreting services for LEP, deaf, and hard-of-hearing members at the hospital's own expense.

Covered Medical, Dental, and Vision Appointments

Interpreting services are available for the following types of medical appointments:

- Network Physician Offices
- Mental Health – outpatient, counselling
- Dental Clinic
- OB/GYN/Mammography/Ultrasound
- Optical
- Pool Therapy
- Physicals
- Speech Therapy
- ENT
- Urgent Care (Only OPI Services)
- Private Physician Offices leasing space in a hospital
- Sleep Center
- Chiropractic Care
- PT/OT
- Home Visits (care follow-up)
- Diabetes Center
- Pediatric Dentistry
- Sports Medicine
- Diagnostic Imaging/Ultrasound/MRI

Appointments Not Covered by CareSource Interpreting Services

Interpreting services are not provided by CareSource for the following types of service:

- Surgical Procedures
- Pre-admission testing
- Anything within the Emergency Room (ER)/Emergency Department (ED)
- Same-day surgery
- Anything inpatient

What Terms and Conditions Apply to Using CareSource Interpreting Services?

CareSource has an obligation to its members to operate with fiscal responsibility. It is important that CareSource, providers, and Vocalink work together to minimize unnecessary expenses, such as patient no-shows and last-minute appointments, while ensuring reliable, high-quality interpreting services for Members. The below terms and conditions apply to all providers use of Vocalink interpreting services through CareSource.

Using Vocalink’s “Tracker” Interpreting Management System

Providers will be granted access to Vocalink interpreting services directly through Vocalink’s online interpreting management platform known as “Tracker.” Each provider may have multiple “users” within the Tracker system. The Tracker system will allow providers to confirm member eligibility for interpreting services, schedule appointments, cancel appointments, reschedule appointments, and view on-site interpreter credentials as qualified medical interpreters. Vocalink maintains a telephone dispatch center as a backup to the Tracker system and for emergency appointments. Significant reliance on the telephone dispatch center increases the overall cost for interpreting services. Providers are encouraged to use the Tracker system as their primary means of scheduling, rescheduling, and cancelling appointments. The Vocalink dispatch center may be used for instances where technical difficulties prevent access to Tracker and for emergency appointments (a need for interpreting services with fewer than 24 hours’ advance notice).

Vocalink provides training for providers on the use of the Tracker system. Additionally, user guides, quick reference sheets, and how-to videos are available on Vocalink’s [website](#). Frequent, non-emergency use of the dispatch center may result in a request from CareSource and Vocalink for additional Tracker training with provider staff, and, in extreme cases, may result in restrictions on the use of Vocalink interpreting services through CareSource.

Advance Notice when Scheduling Interpreting Appointments

Pursuant to CareSource’s contract with Vocalink, providers are expected to schedule interpreting services as follows:

- ASL: A minimum of five (5) business days in advance.
- Spoken languages: A minimum of three (3) business days in advance.

Requests scheduled with less notice than the above timeframes will be reviewed and an onsite (OSI) interpreter *may be* provided, if available. For emergency requests – less than twenty-four (24) hours’ notice – please use the Vocalink dispatch center to request service.

Because Medicaid eligibility is determined on a monthly basis, no interpreting appointments may be scheduled more than forty-five (45) calendar days in advance.

Limiting Use of “Rush Appointments”

A premium cost is associated with “Rush Appointments.” A Rush Appointment is a request for an on-site interpreter with four or fewer hours’ advance notice. Rush Appointments should be limited to true, medical emergencies where OPI cannot reasonably be used and an on-site interpreter is necessary. Rush Appointment requests should be made via the Vocalink dispatch center. When scheduling a Rush Appointment, an explanation will be requested of the provider of the emergency that necessitated a Rush Appointment. Vocalink will enter a “Vendor Note” in the Tracker System with that explanation for CareSource review. Repeated use of Rush Appointments without reasonable explanations may result in restriction of use of interpreting services and, in extreme cases, CareSource reserves the right to discontinue the provider’s access to interpreting services paid for by CareSource.

Using OPI as a First Choice

In some cases, a provider may wish to use OPI as a first choice instead of OSI. CareSource has approved the use of OPI as a first option in the following situations:

- **Short/Routine Appointments:** Short (20 minutes or less), routine medical appointments, such as an allergy shot, TB test, or immunization.
- **Rare Languages:** Appointments requiring a rare language that is not available via OSI pursuant to the Vocalink language list (available on Vocalink's website).
- **Member Request:** Appointments where the member has expressed a strong preference for telephone interpreting, e.g. where the member prefers that the interpreter not be able to see him/her in a state of undress.
- **Emergencies:** Emergencies where there is no time to wait for an on-site interpreter.
- **Urgent Care:** Urgent care facilities may only use OPI.

To request an OPI appointment for one of the above reasons, the provider must schedule the appointment in the Tracker system and choose OPI as the Type of Service (please refer to the OPI training materials on Vocalink's website for additional information). The provider will need to include a "Vendor Note" explaining the reason for using OPI in the first instance for that appointment. A lengthy explanation is not necessary here. Rather, "short/routine," "rare language," "member request," or "emergency" will suffice. (CareSource may contact the provider for additional details, if needed.) The provider should note the Tracker Appointment Number assigned, as this information must be provided when calling the OPI system to demonstrate that member eligibility for interpreting services has been confirmed.

Once the appointment has been scheduled, the provider may access Vocalink's 24/7/365 on-demand OPI system via the toll-free telephone number and access code provided by Vocalink.

To use OPI as a first choice for a reason other than those listed above, a provider is required to obtain prior authorization from CareSource by contacting Provider Services and explaining why OPI is the best choice for the particular appointment.

Using VRI as a First Choice

In some cases, a provider may wish to use VRI as a first choice instead of OSI. CareSource has approved the use of VRI as a first choice in the following situations:

- **Short/Routine ASL Appointments:** Short (20 minutes or less), routine medical appointments for deaf or hard-of-hearing members, such as an allergy shot, TB test, or immunization.
- **ASL Emergencies:** Emergencies where there is no time to wait for an on-site ASL interpreter.

To request an ASL VRI appointment for one of the above reasons, the provider must schedule the appointment in the Tracker system to ensure that the member is eligible for interpreting services and choose VRI as the Type of Service (please refer to the VRI training materials on Vocalink's website for additional information). The provider will need to include a "Vendor Note" explaining the reason for using VRI in the first instance for that appointment. A lengthy explanation is not necessary here. Rather, "short/routine ASL," "emergency ASL" will suffice. In

the event a short/routine appointment unexpectedly exceeds the 20-minute estimate, providers are encouraged to enter an explanatory Vendor Note in Tracker. (CareSource may contact the provider for additional details, if needed.) The provider should make note of the Tracker Appointment Number assigned, as this must be entered in the VRI platform to demonstrate that member eligibility for interpreting services has been confirmed.

Once the appointment is scheduled, the provider may access Vocalink's 24/7/365 on-demand VRI system via an internet browser or via the mobile app on a smart phone or tablet.

To use VRI as a first choice for a reason other than those listed above, a provider is required to obtain prior authorization by contacting Provider Services and explaining why VRI is the best choice for the particular appointment.

Length of Appointment

On-site interpreting resources are limited to the on-site interpreting staff employed by or through Vocalink. Providers are encouraged to schedule appointments for the length of time they reasonably believe will be required to allow each interpreter to assist multiple patients each day.

Note that on-site interpreters are not permitted to stay past the scheduled end time of an appointment except in limited situations based on their daily schedules or an unexpected medical emergency arising during the appointment. In all cases, interpreters are required to contact Vocalink for permission to stay past a scheduled end time. In the event you require additional interpreting services past a scheduled end time, OPI may be used as an alternative (VRI for ASL) to finish the appointment with the member.

Timely Cancellation of Appointments

Providers are required to cancel interpreting appointments immediately upon learning that the underlying medical appointment has been cancelled. Should a provider cancel an appointment fewer than four (4) hours in advance, a Vendor Note explaining the last-minute cancellation must be entered into the Tracker system (or provided to the Vocalink telephone dispatcher, as applicable).

CareSource understands that last-minute cancellations sometimes occur due to reasons outside the provider's control, including member cancellations. Repeated, last-minute cancellations for reasons other than those outside the provider's control may result not only in removing their ability to use Vocalink interpreting services paid for by CareSource, but CareSource may require the provider to reimburse it for the cost of the interpreting appointment.

Maintaining Up-to-Date User Information

Vocalink will allow providers to name multiple individuals as Users within the Tracker system. It is the providers' obligation to keep its user list, including contact information, up-to-date and to immediately inform Vocalink in the event a user leaves the provider's office or is for any other reason no longer permitted by the provider to access the Tracker system. Please note that the Tracker system requires a unique, valid email for each user. All communications through the Tracker system, including appointment confirmations, cancellations, and the like, will be sent to the user's email as entered into Tracker. As such, it is vital that providers maintain up-to-date email address information within Tracker. All email communications and notifications require close and timely attention and are considered part of all parties' responsibilities.

What Are CareSource's Rights and Responsibilities with Respect to a Provider's Requested Interpreting Appointments?

Right to View, Edit, and/or Cancel Appointments for CareSource Members

CareSource will have the ability to view all appointments providers schedule within Tracker for eligible CareSource members. To the extent that a provider also uses Vocalink services for non-CareSource members, CareSource will not be able to see appointments within Tracker for non-CareSource members.

Additionally, CareSource retains the right to modify and/or cancel any appointment in the Tracker system for any CareSource member at any time, for any reason.

Paying for Eligible Appointments

CareSource will pay Vocalink directly for all eligible interpreting appointments. Providers will only assume financial responsibility should they access Vocalink services knowing that the member is ineligible, that the type of appointment is not eligible pursuant to this Usage Policy, or other circumstances specifically stated within this Usage Policy. In such cases, CareSource reserves the right to seek reimbursement directly from the provider.

Maintaining Up-to-Date Member Eligibility List(s) with Vocalink

CareSource and Vocalink have developed a system within Tracker to check the eligibility of members to receive interpreting services. It is CareSource's obligation to provide Vocalink with accurate, up-to-date member eligibility data. In the event that interpreting services are provided to an ineligible person due to a CareSource error in providing Vocalink with eligibility data, CareSource will not hold the provider financially responsible.

Assisting with Partner, Member, and/or Appointment-Type Eligibility Questions

CareSource Provider Services is available to assist providers with questions regarding the provider's eligibility to access services, member eligibility, and appointment-type eligibility. Contact Provider Services at **1-800-488-0134** for questions or concerns regarding these topics. Contact Vocalink directly for any questions or concerns regarding scheduling, rescheduling, and/or cancelling an interpreting appointment.

Right to Limit and/or Withdraw a Provider's Direct Access to Interpreting Services

CareSource reserves the right to limit and/or withdraw a provider's direct access to OSI, OPI, and/or VRI services at any time and for any reason, including, but not limited to:

- Repeated failures to abide by this Usage Policy;
- Any legal and/or corporate change that alters CareSource's provision of interpreting services;
- Any change to the Vocalink-CareSource contract that results in a discontinuation of or alteration to the services described in this Usage Policy;
- Any change in the relationship between CareSource and the provider.

Change in Eligibility

Member eligibility is updated daily on CareSource systems and communicated to Vocalink. In the event that a member eligibility change affects a scheduled interpreting appointment for that member, the appointment will be automatically cancelled, and a notification will be sent to the provider email address.

Entering into a relationship with Vocalink

CareSource understands that some of its providers have separate business relationships with Vocalink, or may decide to enter into a business relationship with Vocalink, to provide language solutions for non-CareSource members.

To the extent a provider maintains a separate business relationship with Vocalink, they do so at their own discretion and at their own risk. CareSource assumes no responsibility for the relationship between any provider and Vocalink, and cannot be held responsible for any appointments scheduled for non-CareSource members.

Acknowledgment Form

I, _____, as an authorized representative
of _____ (hereinafter, "Provider"),
do hereby state as follows:

1. I have read and understand the CareSource Interpreting Services Usage Policy (hereinafter, the "Policy");
2. Provider agrees that it shall abide by the terms and conditions of this Policy;
3. Provider shall ensure that all employees, agents, or other representatives permitted by provider to use or access Vocalink interpreting services are informed of the terms conditions of this Policy and agree to abide by them prior to being permitted such access;
4. Provider will maintain up-to-date User information with Vocalink at all times.

ACKNOWLEDGED AND AGREED:

Signature

Date: _____

Print Name

Print Title