

DHCS All Plan Letter Summary

To: Medi-Cal network participants

June 2025

Subject: All Plan Letter 25-005: Standards for Determining Threshold Languages, Nondiscrimination Requirements, Language Assistance Services, and Alternative Formats

The Department of Health Care Services (DHCS) recently issued <u>All Plan Letter (APL) 25-005</u>, "Standards for Determining Threshold Languages, Nondiscrimination Requirements, Language Assistance Services, and Alternative Formats." We are sharing a summary of this APL with you to ensure you are aware of the information, and you can apply the information to your practice or facility operations, where appropriate.

Threshold and concentration languages

In accordance with federal and state law, APL 25-005 advises managed care plans (MCPs) such as Blue Shield of California Promise Health Plan to translate written member information into non-English member languages when the patient population of a service area meets the numeric threshold of 3,000 or five-percent (5%) of the potential members population, whichever is lower, and when it meets the concentration standards of 1,000 in a single ZIP code or 1,500 in two contiguous ZIP codes.

*Note that Russian is now a required language in San Diego County.

View threshold and concentration for all counties

Nondiscrimination notice

MCPs are advised to comply with all federal and state nondiscrimination requirements, and to include a nondiscrimination notice in all member information. They must also designate a discrimination grievance coordinator to investigate and report grievances to DHCS.

While quick response (QR) codes may be used alongside printed notices, they should not replace them.

See the nondiscrimination notice template

Language assistance – notice of availability

DHCS requires MCPs to inform members, prospective members and the general public of the availability of no-cost language assistance services, including assistance in non-English languages and the provision of free auxiliary aids and services for people with disabilities.

Download the notice of availability template

Language assistance – meaningful access

Oral, American Sign Language (ASL) and written language assistance must be provided free of charge to all members with limited English proficiency. Oral interpretation must be provided in every language (regardless of threshold or concentration standards) by qualified interpreters, either in person or by telephone or internet. The APL includes guidance regarding the quality of interpretive services and who

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should provide them. MCPs must inform individuals with limited English proficiency of their right to free interpreter services and avoid using family members as interpreters except in cases of emergency or if the patient specifically requests that their adult family member interpret for them. Written translations must be provided at minimum in the area's threshold and concentration languages.

Effective communication with members with disabilities

To support people with various disabilities, APL 25-005 advises MCPs to provide interpretive services and make member information available in alternative formats, including Braille, audio format, large print (no less than 20-point font), and accessible electronic format (such as a data CD), plus additional aids and services This would include American Sign Language (ASL) interpretation. The APL includes guidance regarding the quality of these interpretive services and who should provide them. MCPs must inform disabled members of their right to free interpreter services and avoid using family members except in cases of emergency or if the patient specifically requests that their family member interpret for them.

This summary is only meant as a brief description of the APL. Please see the APL itself for additional background and the complete requirements. The full text of APL 25-005 may be found at this URL: https://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL%202025/APL25-005.pdf (Links to the DHCS.ca.gov website will take you off the Blue Shield Promise website.)

If you have questions about the topics covered in this APL, please contact our Provider Customer Service team via Live Chat after logging in at blueshieldca.com/provider or call (800) 468-9935 from 6 a.m. to 6:30 p.m., Monday through Friday.

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