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Owner Nadine Ludovico:
Compliance
Manager
Area Compliance
Applicability Privia Health and
All Markets

Non-Discrimination and Limited English Proficiency

1. Purpose

This policy establishes the requirements to ensure adherence to Section 1557 of the Affordable Care Act (ACA) which prohibits discrimination on the basis of race, color, national origin, sex, age, or disability. Language assistance services must be provided for individuals with limited English proficiency.

2. Scope:

This policy applies to the officers, directors, and workforce of (1) Privia Health Group, Inc., its subsidiaries, and affiliates (collectively "Privia"), (2) any entity for which Privia is contractually obligated to manage such entity's compliance program, including Non-Owned Medical Groups, and (3) Care Centers who access Privia's Technology Platform.

3. Definitions:

"Tagline" - An alert notifying individuals with limited English proficiency to the availability of language assistance services. Required to be posted in the top fifteen (15) languages spoken in a Care Center's State.

4. Policy:

1. Privia Health complies with Section 1557 of the ACA which requires the provision of language assistance services to protect the privacy and independence of individuals with limited English proficiency. These services must be provided to patients free of charge and be accurate and timely.
2. A Non-Discrimination Notice in English and Spanish as well as Taglines with the top fifteen (15) languages spoken in the respective State will be posted in the patient waiting or check-in

area. (See attachments to this policy to download State specific posters.)

3. Language assistance services may include:

- Oral language assistance, including interpretation in non-English languages provided in person or remotely by a qualified interpreter for an individual with limited English proficiency, and/or the use of qualified bilingual or multilingual staff to communicate directly with individuals with limited English proficiency; and
- Written translation, performed by a qualified translator, of written content in paper or electronic form into languages other than English.

i. Interpreter and translation services must be provided by an interpreter or translator who:

- Adheres to generally accepted ethics principles, including client confidentiality;
- Demonstrates proficiency in speaking, writing and understanding at least spoken or written English and the spoken or written language in need of interpretation or translation;
- Is able to interpret or translate effectively, accurately, and impartially, both receptively and expressly, to and from such language(s) and English, using any necessary specialized vocabulary, terminology and phraseology; and
- Is able to provide interpreter services in real time through clear, audible audio transmission of voices.

ii. Privia Medical Group Care Centers will not:

- Require an individual with limited English proficiency to provide his or her own interpreter;
- Rely on an adult accompanying an individual with limited English proficiency to interpret or facilitate communication, except
 - In an emergency involving an imminent threat to the safety or welfare of the individual or the public, where there is no qualified interpreter for the individual with limited English proficiency immediately available; or
 - Where the individual requests the accompanying adult interpret or facilitate communication, the accompanying adult agrees to provide such assistance, and reliance on that adult for such assistance is appropriate under the circumstances;
- Rely on a minor child to interpret or facilitate communication, except in an emergency involving an imminent threat to the safety or welfare of the individual or the public, where there is no qualified interpreter for the individual; or
- Rely on staff other than qualified bilingual/multilingual staff to communicate directly with individuals with limited English proficiency.

5. Procedure:

i. All Privia Medical Group Care Centers will:

- A. Establish services with a vendor to provide qualified interpreter and translation services to individuals with limited English proficiency. The vendor must be able to provide services within a 24 hour notice from the Care Center. All services must comply with the requirements listed above in this policy.
- B. Individuals requiring interpreter or translation services should be advised that no less than 24 hour notice must be provided to facilitate communication.
- C. Upon notice that an individual will require interpreter or translation services, the Care Center shall schedule such services with a qualified interpreter or translator at no charge to the individual.
- D. Ensure that all individuals are able to communicate accurately and comfortably with all treating providers and staff.

ii. Interpreter and Translation Services

- A. Care Centers may establish services with any qualified vendor to provide interpreter and translation services to patients.
- B. PMG offers a preferred vendor with discounted interpreting services for Care Centers, Sign Language USA (SLUSA). Care Centers may contact procurement@priviahealth.com to obtain available pricing and initiate services with SLUSA. (See SLUSA-Interpreter Services summary)

Attachments

[CA-Nondiscrimination Notice & Taglines.pdf](#)

[CO-Nondiscrimination Notice & Taglines.pdf](#)

[CT-Nondiscrimination Notice & Taglines.pdf](#)

[DC-Nondiscrimination Notice & Taglines.pdf](#)

[DE-Nondiscrimination Notice & Taglines.pdf](#)

[FL-Nondiscrimination Notice & Taglines](#)

[GA-Nondiscrimination Notice & Taglines](#)

[MD-Nondiscrimination Notice & Taglines](#)

[MT-Nondiscrimination Notice & Taglines](#)

[NC-Nondiscrimination Notice & Taglines.pdf](#)

[Nondiscrimination Notice - Care Centers.docx.pdf](#)

[OH-Nondiscrimination Notice & Taglines.pdf](#)

[SC-Nondiscrimination Notice & Taglines.pdf](#)

[SLUSA-GPO Services.pdf](#)

[TN-Nondiscrimination Notice & Taglines](#)

[TX-Nondiscrimination Notice & Taglines](#)

[VA-Nondiscrimination Notice & Taglines](#)

[WA-Nondiscrimination Notice & Taglines.pdf](#)

Approval Signatures

Step Description	Approver	Date
Chief Audit & Compliance Officer Approval	Dana Fields: Chief Audit & Compliance Officer	06/2024
Compliance & Audit Leadership #1	Deanna Nicolozakes: Director, Compliance & PMG Compliance Officer	06/2024
	Nadine Ludovico: Compliance Manager	05/2024