

Payment Policies for Healthcare Services

Provided to Injured Workers and Crime Victims

Chapter 14: Language Access Services for Spoken Languages

Effective June 17, 2024



Link: Look for possible [updates and corrections](#) to these payment policies on L&I's website.



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Definitions

The following terms are utilized in this chapter and are defined as follows:

Appointment: A scheduled encounter between a provider and a worker or crime victim.

Client: A worker, an individual, or a group of people that uses the professional services of an interpreter. May also be known as a patient.

Encounter: An interpretation service request initiated by the provider or their staff and scheduled by SOS International LLC (SOSi) which has been completed (not cancelled or re-scheduled) by a language access provider (LAP).

Encounter fee: A set fee for each encounter where the worker or crime victim, provider, and appointment are the same.

Independent medical examination (IME): An objective medical legal examination requested by the department or self-insurer to establish medical facts about a worker's physical condition. Only department-approved examiners may conduct these exams.



Link: For more information, see [WAC 296-23-302](#).

Initial visit: The first visit to a healthcare provider during which the Report of Accident (Workplace Injury, Accident or Occupational Disease) is completed and the worker files a claim for workers' compensation.

Language Access Provider (LAP): Individual providing spoken language interpretation services for workers or crime victims during medical and vocational visits.

On-demand appointment: Unscheduled appointment where interpretation services are necessary for emergency care, urgent care, or where the medical provider determines that advanced notice is not feasible. Appointments for treatments which would typically be scheduled in advance don't qualify as on-demand.

Sight translation: Oral rendition of text written from one language into another language, usually done in the moment by the interpreter.

Wait time: The time between the scheduled start time and the actual start time of an appointment. No other covered services are performed during this time.



General information: All spoken language interpretation services

Purpose of this section

Workers or crime victims who have limited English proficiency or sensory impairments may need interpreter services to communicate effectively with healthcare or vocational providers. This section outlines requirements, expectations, and information applicable to all providers who offer spoken language access services or utilize them for the benefit of workers or crime victims.

This section contains information about:

- [The roles and responsibilities of medical and vocational providers](#),
- [The roles and responsibilities of language access providers \(LAPs\)](#), and
- [L&I's interpretation services scheduling system](#), operated by SOSi.

Who the policies in this chapter apply to and when

The policies in this chapter apply to all language access providers (LAPs) for all spoken languages when providing services:

- For healthcare, **independent medical examinations (IMEs)**, and vocational **encounters**,
- In all geographic locations,
- To workers and crime victims having limited English proficiency or sensory impairment, and receiving benefits from:
 - The State Fund, *or*
 - Self-insured employers, *or*
 - The Crime Victims Compensation Program.

Self-insured employers and/or their Third Party Administrators (TPAs) are required to comply with L&I's payment policies and must obtain interpreter services using L&I's contracted vendor.



Note: The policies in this chapter don't apply to sign language interpreters. See [Chapter 22: Other Services](#) for sign language interpretation policy.

Information for medical and vocational providers

Avoiding discrimination based on limited English proficiency (LEP) status

[Title VII of the Civil Rights Acts of 1964](#) prohibits discrimination on the basis of race, color, or national origin in any program or activity that receives Federal funds or other Federal financial assistance. This includes discrimination based on limited English proficiency (LEP). As a result, recipients and sub-recipients of Federal financial assistance are responsible for taking reasonable steps to ensure meaningful access by LEP persons to the recipient's and sub-recipient's programs or activities, including the use of an interpreter. **Failure to ensure meaningful access constitutes illegal discrimination and is a violation of an individual's civil rights.**

The [Americans with Disabilities Act \(ADA\)](#) encourages healthcare or vocational providers serving L&I workers or crime victims to consult with the patient to identify appropriate aid or service necessary to treat them effectively. L&I covers the cost of interpretation services for approved interpreters; however, the healthcare or vocational provider is responsible for following the ADA guidance for interacting with individuals with communication challenges.

Determining when an LAP is needed

The healthcare or vocational provider will determine, with input from the worker, if the assistance of an LAP is needed for effective communication to occur.

If assistance is needed, the healthcare or vocational provider will schedule an LAP to provide interpretation during an **appointment**.

Checking claim status prior to obtaining interpretation services

Prior to requesting an LAP, providers must check claim status with the insurer. For State Fund claims, call **1-800-831-5227** for automated updates on claim status. For self-insured claims, contact the [Self-insured Employer \(SIE\)](#) or their Third Party Administrator (TPA).

If the interpretation services are not compensable by L&I, an SIE or their TPA, or the Crime Victims Compensation Program, the provider requesting the interpretation services will be responsible for the cost of the services.

Requesting and selecting an LAP

Visit our [website](#) for details on requesting LAPs through SOSi.

The scheduling system is responsible for connecting LAPs with providers who need their services. Providers can choose:

- The time, date, and duration of the interpretation visit,
- The language and dialect of the LAP,

- The most appropriate method for the visit (in-person, over-the-phone, or video remote), *and*
- The preferred gender of the LAP, at worker's request.

Providers generally can't choose a specific LAP, except in certain situations (see [Using the same LAP for multiple visits](#)).

Changing LAPs or interpretation methods

SOSi will make every effort to secure an LAP in the method requested by the provider. However, if SOSi is unable to secure an LAP using the requested method within 48 hours of the scheduled start time for the visit, the system will automatically offer another method as a backup (for example, if video remote is requested but can't be filled, the system will offer over-the-phone and in-person, if available).

If the LAP provided by the scheduling system isn't meeting the interpretation needs of the visit, contact [SOSi](#) to provide feedback.

Using the same LAP for multiple visits

Healthcare and vocational providers can't select the same interpreter for every **appointment** scheduled with the worker unless there are extenuating circumstances. Situations in which the same LAP may be used for each **appointment** are limited to the following:

Crime victims

When it is necessary for continuity of care and case familiarity for a **crime victim**.

Mental health treatment by a mental health provider

If the worker has authorized coverage for **mental health** (a mental health condition must be allowed on the claim). The ability to request the same LAP is only for the mental health provider furnishing mental health treatment and/or a diagnosis to a worker, not every provider involved in the worker's care. See [Chapter 17: Mental Health Services](#) for information regarding who must perform mental health services to qualify for payment.

Pain management or brain injury program

If the worker is participating in a **pain management program** or a **brain injury rehabilitation program** where having the same LAP is beneficial to the outcome of the program, and the provider is providing services as part of an approved structured intensive pain management program (SIMP) or brain injury rehabilitation program. The program must be insurer-approved and authorized.

Languages of lesser diffusion ("rare" languages)

For workers who require interpretation in a **language of lesser diffusion** (sometimes referred to as a "rare" language). Requests for the same LAP may be allowed on a case-by-case basis and are dependent on availability of the LAP.

Using unapproved interpreters

As a last resort, if the medical or vocational provider can't find an L&I-approved LAP and no phone or video services are available, they may use non-certified or unapproved interpreters. **The insurer won't pay for these services and strongly discourages their use.**

Credentialed employees of healthcare and vocational providers

Credentialed employees of healthcare and vocational providers may provide services to **clients** if the provider determines it is most appropriate for their clinic or facility to employ their own interpreter. The insurer doesn't reimburse interpreters in this case. The provider is responsible for ensuring the interpreter is credentialed and provides meaningful access to the **client**.

Information for language access providers (LAPs)

Professional conduct and ethical guidelines

L&I is responsible for ensuring workers and crime victims receive proper and necessary services. LAPs are expected to adhere to the ethics requirements set forth by their certification or [WAC 388-03-050](#) if the certification the LAP holds doesn't have an ethics component. L&I adopts a modified version of this WAC as the ethics expectation standard for LAPs.

Required credentials

In-state LAPs must hold an active, up-to-date credential in good standing (not revoked) from one or more of the following organizations:

If the agency or organization is...	Then the credential is a...
Washington State Department of Social and Health Services (DSHS)	Social or Medical Certificate, or letter of authorization as a qualified social and/or medical services interpreter
Washington State Administrative Office for the Courts (AOC)	Certificate
National Board of Certification for Medical Interpreter (NCMI)	Certified Medical Interpreter (CMI)
Certification Commission for Healthcare Interpreters (CCHI)	Certified Healthcare Interpreter
Federal Court Interpreter Certification Test (FCICE)	Certificate, or letter of designation or authorization
US State Department Office of Language Services	Verification letter or Certificate

LAPs are responsible for maintaining their credentials as required by the credentialing agency or organization. LAPs may only be paid for services in the languages for which they have provided credentials. Provisional certifications aren't accepted. See the [Accepted Credentials](#) page on our website for more details.

If the LAP's credentials expire or are revoked for any reason, the LAP must immediately notify the scheduling system vendor. Out-of-state LAPs must immediately notify L&I of the expiration or changes. Bills for services rendered after an LAP's credentials expire or are revoked will be denied.

Out-of-state interpreters

For out-of-state interpreters, accepted credentials include those from:

- Any organization listed in the table above, *or*
- State credentialing agency or organization equivalent to WA DSHS, *or*
- State Medicaid programs, *or*
- Other nationally recognized programs.

Certifications will be reviewed on a case-by-case basis. Testing must be administered by a third-party organization whose business is to conduct certification for interpreters. L&I reserves the right to review all testing and decline certification if the certificate doesn't meet the [minimum criteria](#).

Identification numbers

All LAPs are required to have a National Provider Identification (NPI) number. NPIs are unique 10-digit numbers used to identify specific providers. To obtain an NPI number, visit the [National Plan & Provider Enumeration System website](#).

LAPs providing services as part of the scheduling system aren't required to have an L&I provider account.

All out-of-state LAPs must have an active L&I provider account. To obtain an L&I provider account number, out-of-state LAPs must submit credentials using the **Submission of Provider Credentials for Interpreter Services** form ([F245-055-000](#)). See our [Become an Interpreter](#) page for more details.

Additional LAP requirements for hospitals and other facilities

Hospitals, freestanding surgery and emergency centers, nursing homes, and other facilities may apply additional requirements for persons providing services within the facility. For example, a facility may require all persons delivering services to have a criminal background check, even if the provider isn't a contractor or a facility employee.

The facility is responsible for notifying the scheduling system of their additional requirements and managing compliance with the facility's requirements.

Information about the interpretation services scheduling system

Using the scheduling system

L&I has a contract with SOS International LLC (SOSi) for the scheduling of:

- All on-demand and scheduled in-person interpretation (IPI) services in and near Washington State,
- Video remote interpretation (VRI) throughout the state of Washington and any other state within the United States,
- Over-the-phone interpretation (OPI) services throughout the state of Washington and any other state within the United States, *and*
- OPI services for out-of-country requests.

In order to receive covered language access services, medical and vocational providers must use the scheduling system for all interpretation requests (except out-of-state IPI).



Link: [Email L&I's Interpreter Services program](#) for general feedback regarding the scheduling system.

Types of services that can be requested

In-person interpretation (IPI) is on-site interpretation where all individuals specified for the **appointment** are physically present.

Over-the-phone (OPI) is a telecommunication service using telephonic technology hosted by SOSi that utilizes a remote or offsite LAP to provide language access services through an audio-only connection. This includes when some or all parties are located remotely.

Video remote interpretation (VRI) is a video-based interpreting event that utilizes a HIPAA-compliant video telecommunication service hosted by SOSi to connect devices such as web cameras or videophones and utilizes a remote or off-site LAP to provide language access services on screen. This includes when some or all parties are located remotely and includes telehealth **appointments**.

Check-in and check-out procedures

LAPs must check in and check out electronically using SOSi's app or website to ensure their interpretation time is accurately captured.

LAPs should check in at the start time of the **appointment** (unless arriving after the start time, in which case they should check in at the time of arrival). LAPs may only check in 15 minutes before the **appointment** if the **client** shows up early and is checked-in for the **appointment**. LAPs should promptly check out when the **appointment** ends.

The medical or vocational provider may be required to validate that services were rendered by the LAP and confirm the check-in or check-out times logged by the LAP.

Out-of-state in-person interpretation requests

IPI services provided by interpreters working strictly out-of-state and outside the border zip codes that start with 970, 971, 972, 978 in Oregon and 835 or 838 in Idaho are not included in the scheduling system and must be arranged by the provider by contacting the interpreter directly. Resources are available [on our website](#).

International calls

Providers may access OPI services for international calls. The provider, LAP, and **client** will have access to a Zoom meeting, which can be joined using a link or by calling in with a phone number. The provider will have the ability to call the **client** from the Zoom meeting if needed.



Payment policy: Interpretation services

Prior authorization

Interpretation services don't require prior authorization on open claims.

Services that can be billed

The following services and charges are billable:

- Interpretation during the **initial visit**,
- Interpreter services which facilitate language communication between the worker and a healthcare or vocational provider,
- Time spent waiting for an **appointment** that doesn't begin at time scheduled (when no other covered services are being delivered during the **wait time**)
- Up to 15 minutes prior to the scheduled start time of an appointment if the LAP and worker are both checked in,
- Services related to the completion of a reopening application (if a claim is reopened, the insurer will determine which services are reimbursable),
- Interpretation during insurer-requested IMEs,
- No-show fees for IMEs, *and*
- Interpretation for family members or guardians of minor workers.

Interpretation services fee schedule

Code	Description	Payment limits and authorization requirements	1 unit of service equals...	Maximum fee
9902M	SOSi Encounter Fee	Payable only to SOSi, once per in-person, video, or over-the-phone interpreter encounter.	1 encounter	\$14.95 per encounter

Code	Description	Payment limits and authorization requirements	1 unit of service equals...	Maximum fee
9984M	SOSi in-person interpreter, per minute Direct service time between the client and healthcare or vocational provider.	Scheduled and on-demand in-person interpreter services (IPI) throughout the state of Washington and border zip codes that start with 970, 971, 972, 978 for Oregon, or 835 or 838 for Idaho.	1 minute	\$1.03 per minute
9990M	SOSi video interpreter, per minute Direct service time between the client and healthcare or vocational provider.	Scheduled and on-demand video remote (VRI) interpreter services throughout the state of Washington and any other state within the United States.	1 minute	\$0.82 per minute
9983M	SOSi over-the-phone interpreter, per minute Direct service time between the client and healthcare or vocational provider.	Scheduled and on-demand over-the-phone (OPI) interpreter services throughout the state of Washington, any other state within the United States, and out-of-country requests.	1 minute	\$0.67 per minute

Services provided on rejected claims

Language access services provided for claims which are ultimately rejected will be paid for dates of service up to (but not including) the date of the rejection order.

Services that aren't covered

Any use of an interpreter who isn't part of the scheduling system and/or hasn't been approved by L&I isn't covered. Bills for services provided by interpreters who aren't part of the scheduling system and don't have active L&I provider account numbers will be denied.

Assisting the worker to complete forms required by the insurer and/or healthcare or vocational provider using **sight translation** isn't a separately billable service.

In addition, the following services and charges aren't covered:

- Interpretation services of any kind (IPI, OPI, and/or VRI) exceeding **480 minutes** (8 hours) per day per interpreter,
- Interpretation services for treatment visits that aren't covered by the insurer (see [WAC 296-20-03002](#)),
- Interpretation services provided for a closed claim, except services associated with the **initial visit**, the visit for the worker's application to reopen a claim, or for a worker receiving a pension with a treatment order,
- Interpretation services provided on rejected claims for dates of service after the date of the rejection order, except for visits authorized and requested by the insurer,
- No-show fees for any service other than an insurer-requested IME,
- Personal assistance on behalf of the worker such as scheduling **appointments**, translating correspondence, or making phone calls,
- Interpretation services not related to the worker's communications with healthcare or vocational providers,
- Overhead costs such as phone calls, photocopying, and preparation of bills,
- Document translation (see [Chapter 22: Other Services](#)),
- Interpretation provided by family members or friends of the worker or crime victim,
- Interpretation provided by anyone under the age of 18,
- Interpretation services rendered by interpreters who are not registered in the scheduling system or registered directly with L&I to provide out-of-state services,
- Interpretation services provide by LAPs who have had their certification revoked by a certifying authority,
- Mileage and/or travel time,
- Any time prior to the start of an **appointment** if the worker is not present, *and*
- Interpretation services provided by credentialed employees of providers.

Interpretation for legal counsel

Payment for interpreter services for legal purposes including but not limited to attorney **appointments**, legal conferences, testimony at the Board of Industrial Insurance Appeals or any court, or depositions at any level is the responsibility of the attorney or other requesting party and isn't covered by the insurer.

Requirements for billing

The scheduling system will handle bills for in-state LAPs. SOSi is required to pay LAPs 15 days after receiving payment from the insurer.

Payment limits

LAPs are limited to **480 minutes** (8 hours) per day for all interpretation services rendered (IPI, VRI, and OPI).

Only time spent delivering interpretation services may be billed. Time is counted from when the **appointment** is scheduled to begin or when the interpreter arrives and the worker is present and checked in for the visit, whichever is later, to when the services end. Time spent providing **sight translation** isn't counted separately.

Exception: If the **appointment** starts early, time is counted from when the **appointment** actually begins. For example, the **appointment** is scheduled to start at 8:30 a.m. but interpreter arrives at 8:00 a.m. and **appointment** starts early at 8:15 a.m. Time is counted from 8:15 a.m. when the **appointment** actually started.



Link: [Email SOSi](#) for any billing questions regarding services rendered through the scheduling system and registration questions.

Example

The **client** goes to emergency clinic without a prescheduled **appointment**. The provider determines that an in-person LAP is appropriate for this visit due to the sensitivity of the medical services being rendered and submits a request for on-demand in-person LAP. SOSi secures an in-person LAP. However, it will take the LAP 20 minutes to get to the service address. SOSi offers the provider the use of OPI or VRI services until the in-person LAP shows up. The provider accepts the use of OPI services until the in-person LAP shows up.

SOSi will submit one bill to the insurer and include the following charges (if applicable):

- Encounter fee
- Actual OPI services rendered (per-minute)
- Actual IPI services (per-minute)

Encounter fees

Surgical **appointments** that exceed 8 hours may require multiple back-to-back interpretation services requests to be submitted in the system. Only in situations where the encounter is for more than 8 hours will the insurer compensate SOSi an encounter fee for each request due to the 8-hour LAP cap.

In cases where the encounter is for a **client** who has multiple claims, the insurer will only compensate SOSi for one encounter fee. Furthermore, if SOSi secures multiple interpreter services (OPI, VRI, or IPI) or multiple LAPs for the same encounter, the insurer will only pay SOSi one encounter fee.



Payment policy: Interpretation services for independent medical exams (IMEs)

Prior authorization

Prior authorization from the insurer is required for **9996M**.

Who must perform these services to qualify for payment

When an IME is scheduled, the IME provider will arrange for interpretation services through SOSi.

Interpreters who accompany the worker without being scheduled by SOSi won't be paid or allowed to interpret at the IME.

Services that can be billed

In addition to the codes outlined in [Payment policy: Interpretation services](#), SOSi or the out-of-state interpreter may bill for a no-show if the **client** fails to appear at an insurer-requested IME.

Code	Description	Payment limits and authorization requirements	1 unit of service equals...	Maximum fee
9996M	Interpreter “IME no-show” Wait time when client doesn't attend the insurer requested IME, flat fee.	Only 1 no-show per client per day.	1 client no-show at IME	\$60.15



Link: For more information, see [WAC 296-20-010\(5\)](#) which states, “L&I or self-insurers will not pay for a missed appointment unless the appointment is for an examination arranged by the department or self-insurer.”

Services that aren't covered

Interpretation services provided by persons (including interpreters through SOSi) who meet any of the following criteria aren't covered:

- Those related to the worker or crime victim, *or*
- Those with an existing personal relationship with the worker or crime victim, *or*
- The worker's or crime victim's legal or lay representative or employees of the legal or lay representative, *or*

- The employer’s legal or lay representative or employees of the legal or lay representative, *or*
- Any person who couldn’t be an impartial and independent witness, *or*
- Persons under age 18.



Link: See [WAC 296-23-362\(3\)](#), which states, “The worker may not bring an interpreter to the examination. If interpreter services are needed, the insurer will provide an interpreter.”

Payment limits

Only one no-show fee per **client** per day is payable.

For IME panel **appointments** only, provider may request the same LAP for the duration of the **appointment** time. Breaks in the schedule aren’t covered by the insurer.

Additional information

If SOSi is unable to fill a request for an LAP and 24 or fewer hours remain before the scheduled appointment time, the request will be escalated. Every effort will be made to fill the **appointment** using the requested method (in-person, over-the-phone, or video remote); however, if the request for the desired method can’t be filled, SOSi will offer other methods, if available.



Payment policy: Out-of-state interpretation services

General information

This policy applies to interpretation services rendered outside of Washington State. Interpretation services are covered regardless of the location of the worker.

The rules outlined in [General information: All spoken language interpretation services](#) section also apply to out-of-state interpreters.

Services that can be billed

For in-person interpretation services outside of Washington State and outside border zip codes that start with 970, 971, 972, 978 in Oregon and 835 or 838 in Idaho, healthcare or vocational providers must arrange services with a local interpreter. Interpreters must have a unique L&I provider account number and submit an **ISAR** with their bill.

Out-of-state interpretation services fee schedule

Code	Description	Payment limits and authorization requirements	1 unit of service equals...	Maximum fee
9991M	Out-of-state in-person spoken language interpreter, per minute	ISAR required. Payable to individual interpreters registered with L&I to provide in-person interpreter (IPI) services out-of-state.	1 minute	\$1.03 per minute

Billing requirements

An Interpreter Services Appointment Record (**ISAR**) form ([F245-056-000](#)) is required for each visit. All **ISAR** forms must be signed by the healthcare or vocational provider or the provider's staff to verify services. All **ISAR** forms must be submitted in the claim file without crossed-out information, comments, or notes in margins.

If the **appointment** involves multiple claims, a separate **ISAR** must be submitted for each claim and the healthcare or vocational provider or their staff must verify services on each **ISAR**.

All services provided to a worker on the same date for the same claim must be billed together. However, a separate **ISAR** must be completed for each visit.

For [self-insured claims](#), contact the employer for their specific billing requirements. See [Chapter 2: Information for All Providers](#) for more details about identifying self-insured claims.



Link: For more information about billing, see the [General Provider Billing Manual](#).

Payment limits

Out-of-state interpreters are limited to 480 minutes (8 hours) of interpretation per day per interpreter.



Links to related topics

If you're looking for more information about...	Then see...
Administrative rules for interpreter services	Washington Administrative Code (WAC) 296-20-010(5) WAC 296-23-362(3) WAC 296-23-302
Administrative rules for missed appointments	WAC 296-20-010(5)
Becoming an L&I interpreter provider	Become an Interpreter on L&I's website
Becoming an L&I provider	Become A Provider on L&I's website
Billing adjustments	Billing adjustments on L&I's website
Billing instructions and forms	Chapter 2: Information for All Providers
Common Errors on the Interpreter Services Appointment Record (ISAR)	F245-436-000
DES Telephone and Video Interpreter Services contract	Washington State Government DES website
Ethics for Interpreters	WAC 388-03-050
Federal laws relevant to interpreter services	Civil Rights Act of 1964
Fee schedules for all healthcare professional services (including interpreter services)	Fee schedules on L&I's website
How providers arrange interpreter services	How to arrange for interpreter services on L&I's website
Interpreter Lookup Service	Interpreter lookup service on L&I's website
Interpreter Services Website	Interpreter services
Interpreter Services Appointment Record (ISAR) form	F245-056-000

If you're looking for more information about...	Then see...
L&I's General Provider Billing Manual	F245-432-000
National Provider Identification number	Centers for Medicare and Medicaid Services website
Sign up for L&I provider news and updates through GovDelivery	Sign up for GovDelivery
Statement for Miscellaneous Services form	F245-072-000

Need more help?

Email L&I's Provider Hotline at PHL@Lni.wa.gov. If you would prefer a phone call, please email us your name and contact number.