

Documenting Translator or Sign Language Services

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Some dentists have patients who, for any number of reasons, have communication challenges that can be addressed through the use of oral translators or visual sign language. A robust patient dental record would document when such a service is provided.

The ability to record use of such services is especially valuable for dentists who are covered entities under nondiscrimination laws such as the **Affordable Care Act (ACA) Section 1557**. Dentists who are subject to such laws may be required to provide “meaningful access to individuals with limited English proficiency” as well as providing effective communication with individuals with communications disabilities such as vision, hearing, or speech disabilities, often through the use of qualified interpreters and translators.

[Read more](#) – August 16, 2016 ADA News article concerning Section 1557.

As of January 1, 2019 there is a specific CDT code to document and report interpreter and translator services –

D9990 certified translation or sign-language services – per visit

CDT code D9990, first published in CDT 2019, is intended to document these services in a clinical scenario when an individual and the doctor or practice staff do not share a common language and a translator or translation service is used to ensure meaningful communication, or when a qualified interpreter is used to ensure effective communication with an individual with a disability. Such assistance, subject to applicable regulatory or contractual requirements, is provided by qualified bilingual staff, staff interpreters, contracts or formal arrangements with organizations or individuals providing interpretation or translation services in-person or through technology and telephonic interpretation services.

NOTE: This guidance supersedes the prior recommendation that code “D9994 dental case management – patient education to improve oral health literacy” could be used to document translation services. CDT code D9990’s nomenclature is more explicit, therefore use of D9994 to document translation services is no longer correct.

Under nondiscrimination laws such as Affordable Care Act, Section 1557 regarding non-discrimination, there may be a requirement for covered entities to provide free language services to individuals with limited English proficiency, and effective communication with individuals with communications disabilities. CDT code D9994 remains available for use when deemed appropriate to document services as described in the code’s descriptor.

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Although D9990 refers to “certified translation or sign-language services,” ADA recommends that it apply to qualified interpretation and translation services, whether or not the provider is certified and whether the service is considered interpretation or translation.

As always, it is up to the dentist to read the full nomenclature and descriptor of a CDT code entry to determine whether the code is appropriate to report the service provided. When the dentist determines that there is no applicable CDT code, an unspecified procedure, by report code may be used to document and report the service (e.g., D9999 unspecified adjunctive procedure, by report).

Please note that: 1) the existence of a CDT Code is not a guarantee of reimbursement for the service by a third-party payer; and 2) HIPAA only requires a third-party payer to accept a CDT Code that is valid on the date of service, and does not mandate coverage.