



June 30, 2025

Paula M. Stannard, Director  
Office for Civil Rights  
Department of Health and Human Services  
Hubert H. Humphrey Building, Room 509F  
200 Independence Avenue, SW  
Washington, DC 20201

**Re: Language Access Provisions of the Nondiscrimination in Health Programs and Activities 2024 Final Rule (Section 1557 of the Affordable Care Act)**

Dear Director Stannard:

The Medical Group Management Association (MGMA) thanks you for your leadership in enforcing federal civil rights laws in healthcare. With a membership of more than 60,000 medical practice administrators, executives, and leaders, MGMA represents more than 15,000 medical group practices ranging from small private medical practices to large national health systems, representing more than 350,000 physicians. We write to you today to raise concerns regarding the ambiguity of the language access provisions from the Nondiscrimination in Health Programs and Activities Rule (RIN 0945-AA17) finalized in 2024 that made updates to Section 1557 of the Affordable Care Act.

MGMA supports language access services for limited English proficient (LEP) individuals and appreciates the Office of Civil Rights (OCR) and Department of Health and Human Services (HHS) pursuit of empowering all patients by ensuring LEP individuals are aware of available translation services. However, we are concerned about specific provisions in the 2024 rule promulgated under former President Biden.

Sections of the final rule require the notice of availability to language access services and auxiliary aids and services to be shared in certain communications in English and the 15 most commonly spoken languages by individuals with LEP in the relevant state or states in which a covered entity operates, as well as in alternate formats for individuals with disabilities. MGMA urged OCR and HHS to take a more flexible approach that focused on the languages actually spoken within the community, as well as encouraged encouraging the establishment of federal reimbursement opportunities or funding for practices administering language assistance services to LEP individuals.<sup>1</sup> These recommendations – which were not incorporated in the final rule – were meant to mitigate the financial and administrative burden associated with these provisions while maintaining access to translation services.

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<sup>1</sup> MGMA, Comment on Nondiscrimination in Health Programs and Activities Proposed Rule (HHS-OS-2022-0012), Oct. 3, 2022, [https://www.mgma.com/getkaiasset/9402c847-6db9-4187-b2b6-28e5a81c8113/10-03-2022\\_MGMA-1557-2022-Proposed-Rule-FINAL.pdf](https://www.mgma.com/getkaiasset/9402c847-6db9-4187-b2b6-28e5a81c8113/10-03-2022_MGMA-1557-2022-Proposed-Rule-FINAL.pdf).

Although HHS issued a “Dear Colleague” letter near the end of 2024 discussing the requirements that need to be implemented by July 5, 2025, essential guidance documents related to the final rule have been removed from HHS’ website.<sup>2</sup> This includes information related to lawsuits enjoining parts of the final rule, FAQs, and more. Further, President Trump issued Executive Order 14224, Designating English as the Official Language of The United States, that seems to contradict provisions within last year’s rule.<sup>3</sup> Similarly, President Trump took regulatory action in his first term changing language access provisions under Section 1557.<sup>4</sup>

The final rule’s requirements are fraught with ambiguity. We ask that you take regulatory action, such as issuing a notice of non-enforcement prior to the July 5, 2025, compliance date, to ensure that medical groups are not subject to costly administrative burdens amid such an uncertain and shifting landscape.

MGMA appreciates OCR’s efforts to ensure patients have access to translation services and looks forward to collaborating on an even-handed approach to avoid instituting burdensome requirements while promoting access to high-quality, cost-effective care. If you have any questions, please contact James Haynes, Associate Director of Government Affairs, at [jhaynes@mgma.org](mailto:jhaynes@mgma.org) or 202-293-3450.

Sincerely,

/s/

Anders M. Gilberg  
Senior Vice President, Government Affairs

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<sup>2</sup> HHS Dear Colleague Letter, Language Access Provisions of the Final Rule Implementing Section 1557 of the Affordable Care Act, Dec. 5, 2024, <https://www.hhs.gov/sites/default/files/ocr-dcl-section-1557-language-access.pdf>.

<sup>3</sup> Executive Order 14224, Designating English as the Official Language of The United States, Mar. 1, 2025, <https://www.whitehouse.gov/presidential-actions/2025/03/designating-english-as-the-official-language-of-the-united-states/>.

<sup>4</sup> HHS, Nondiscrimination in Health and human education Programs or Activities, Delegation of Authority (RIN 0945-AA11), June 19, 2022, <https://www.govinfo.gov/content/pkg/FR-2020-06-19/pdf/2020-11758.pdf>.