

Cenpatico

POLICIES & PROCEDURES	
Department: Quality Improvement	Procedure Name: Cultural Competency
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Approval Date: 12/01/07	Retired Date:
Effective Date: 12/01/07	Review/Revised Date: 12/01/07, 03/11/08, 05/20/09, 10/20/10, 11/16/11, 08/10/12, 08/22/13, 11/20/13
Policy #: CQI.162	Cross Reference:

SCOPE: This policy impacts all staff and departments in Cenpatico

PURPOSE:

This policy demonstrates a commitment to a comprehensive linguistic and cultural competency plan and describes how it will meet the linguistic and cultural needs of the Members it serves. The objectives of this policy include the following:

1. To ensure that Cenpatico is aware of and identifies enrollees who may need additional resources to meet their cultural and linguistic preferences.
2. To ensure that Cenpatico is meets the language requirements of its client health plans and their State mandated requirements to provide enrollee materials in easily understandable formats, including special attention to the reading level requirements set forth.
3. To ensure that Cenpatico meets the needs of enrollees who may require materials in additional formats such as large font, braille, audio recordings, etc.
4. To ensure that Cenpatico meets the needs of enrollees in providing access to interpreters, onsite and offsite when speaking with Cenpatico staff or provider staff.

POLICY:

Cenpatico has developed a Cultural Competency Plan and training program to create an awareness of and sensitivity to the linguistic, disability-related, and cultural differences of our members.

PROCEDURE:

1. All Cenpatico staff must participate in Linguistic and Cultural Competency Training available through new employee orientation.
2. Staff trainings are held at least annually. Staff trainings will occur on an ad hoc basis at the request of the department or as the result of analysis of cultural competency measures.
3. The staff trainings are conducted by a cross functional facilitation team made up of Cenpatico cultural competency experts and in conjunction with local experts on the cultures of the service area of each Cenpatico market.

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4. A record of attendance will be kept to ensure that all those serving Cenpatico members have been trained.
5. Providers are educated on the Cenpatico cultural competency plan and required provider activities that support the plan, through new provider orientation trainings; through the Cenpatico provider manual; and as requested by the provider.
6. The Cultural Competency Plan is evaluated annually in the Cenpatico QI Committee.
7. All member materials are provided in the language(s) most prevalently spoken in the Cenpatico service area and at a reading level that is easily understood by all members. Audio cassettes will be provided for those members who are visually impaired.

ATTACHMENTS: Attachment A: Cultural Competency Plan

REFERENCES:

DEFINITIONS:

REVISION LOG

REVISION	DATE
No changes; for annual review only	05/20/09
Substituted National Advisory Committee for Member Services Committee	10/20/10
Policy number changed from IMHS.QI.150 to CBH.QI.126.FC	10/20/10
Changed all instances of IMHS to Cenpatico	11/16/11
Changed policy number from CBH.QI.126.FC to CQI.126.FC	11/16/11
Changed policy number from CQI.126.FC to CQI.162	08/10/12
Added NH specific requirements	08/10/12
Included references to cultural sensitivity and updated Cenpatico CC goals	08/10/12
Expanded population to include homelessness	08/10/12
For annual review only; no content changes.	08/22/13
Only adding Review/Revised date to comply with FL MMA-CW Implementation	11/20/13

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POLICY AND PROCEDURE APPROVAL

Please sign and date on the lines provided (if applicable):

Electronic signature on file _____ 11/20/13
Cenpatico Senior Director, QI & Process Improvement **Date**

Electronic signature on file _____ 11/20/13
Cenpatico Chief Executive Officer **Date**

Cenpatico will ensure that the Health Insurance Portability and Accountability Act of 1996 (HIPAA) regulations will be enforced in the application of this policy and procedure if applicable. HIPAA is a Federal regulation established to provide protections for the privacy of an individual's individually identifiable health information. Please see Cenpatico HIPAA Policy & Procedure manual for details.

Attachment A: Definition of Cultural Competency

In providing mental health services a good working definition of cultural competency is need in order to ensure that both individual and provider organizations understand and deliver services appropriately to the various populations they serve. The following definition found on the Hogg Foundation for Mental Health webpage listed below defines the cultural competent delivery of mental health services across the organizational, service delivery and clinician level:

"Davis (1997) defines **cultural competence** as the integration and transformation of knowledge, information, and data about individuals and groups of people into specific clinical standards, skills, service approaches, techniques, and marketing programs that match the individual's culture and increase the quality and appropriateness of mental health care and outcomes.

Cultural competence occurs in mental health service delivery when cultural issues are acknowledged and addressed at all levels of an organization administration, service delivery, and clinician.

At the administrative level, cultural competence impacts access, service utilization, staff professional development, and quality improvement throughout the organization. Administrative strategies to promote cultural competence include development of an agency cultural competence plan, community involvement in needs assessment and planning, ethnic and racial diversity of board and staff, among many others.

At the service delivery level, cultural competence fosters engagement and retention of diverse populations in treatment. Some examples of service delivery strategies are incorporation of spiritual beliefs into the treatment of culturally different clients, provision of services in the client's primary language through bilingual staff or interpreters, and use of culturally and linguistically appropriate assessment instruments.

At the clinician level, cultural competence impacts the therapeutic relationship between the clinician and client, supporting the client's participation in treatment. Clinician-level cultural competence is difficult to describe in terms of specific strategies."

Hogg Foundation for Mental Health: Cultural Adaptation Initiative.
http://www.hogg.utexas.edu/programs_cc.html

Davis, K. (1997). *Consumer Driven Standards and Guidelines in Managed Mental Health for Populations of African Descent: Final Report on Cultural Competence*. Rockville, MD: Center for Mental Health Services.

Attachment B: Cultural Competency Plan

Cenpatico's behavioral health service delivery model is tailored to the needs of all clients in the Medicaid, Children's Health Insurance Program (CHIP) and other population groups that Cenpatico may serve. Cenpatico is dedicated to improving the lives of the members it serves through the delivery of culturally sensitive care. Members receiving services through state Medicaid and other publicly funded programs face multiple challenges in the navigation of the health care system. Cenpatico's approach to cultural competency includes not only the provision of language assistance and disability related access improvements. Many of the members served in the Cenpatico system of care face challenges such as homelessness, hearing impairments and developmental disabilities.

Cenpatico adopts a definition of cultural competence which defines cultures in a broad sense as many things, in addition to race, language and ethnicity, contribute to a member's sense of self in relation to others and their community. Cenpatico includes gender and/or sexual orientation; shared life experiences such as trauma, homelessness, physical disabilities, education and occupation in relation to cultural competency in order to accurately represent the diverse needs and challenges of members. For a behavioral health organization, understanding how these factors affect how a person seeks and uses behavioral health services is critical to providing culturally sensitive and competent care.

The Cenpatico vision for culturally competent care is:

- Care is given with the understanding of, and respect for, the member's health related beliefs and cultural values
- Cenpatico staff respect health related beliefs, interpersonal communication styles and attitude of the members, families and communities they serve
- Each functional unit within the organization applies a trained, tailored approach to culturally sensitive care in all member communications and interactions.
- All Cenpatico providers and practitioners support and implement culturally sensitive care models to Cenpatico members.

The Cenpatico goal for culturally sensitive care is:

- To support the creation of a culturally sensitive behavioral health system of care that embraces and support individual differences to achieve the best possible outcomes for individuals receiving services.

Cenpatico Cultural Competency Plan Goals:

1. Ensure Understandable and Respectful Care is Delivered by Cenpatico Staff

To ensure members receive effective, understanding and respectful care that is provided in a manner compatible with their cultural health beliefs, practice and preferred language.

- All staff complete required cultural sensitivity training at least annually.

- Include questions on member and provider phone, case management and satisfaction surveys measuring members' perception staff sensitivity to their identified cultural needs.
- Ensure all care coordination and case management assessments include members' cultural and linguistic preferences.

2. Ensure Accessibility to Language Assistance Services

To ensure that members access bi and/or multi-lingual customer services staff and hearing assistance when contacting Cenpatico.

- Conduct language proficiency testing for all customer service staff
- Monitor and collect language service line data
- Monitor and collect TTD/TTY service utilization

3. Employ Diverse Staff and Leadership

To employ a diverse staff, representative of the demographic population Cenpatico services. This includes diversity in leadership, clinicians and administrative personnel.

- Utilize varied sourcing alternatives, including minority sourcing alternatives, such as websites, newsprint media, colleges and agencies to recruit for open positions.

4. Ensure Organizational and Provider Cultural Competency

To ensure that Cenpatico and its providers adhere to a high standard of cultural sensitivity in service delivery based on the Cenpatico definition, vision and goals for cultural competency.

- Conduct audits of Cenpatico care coordination and case management assessments and plans to ensure inclusion of member cultural and linguistic preferences.
- Ensure all member needs, including physical impairments and psychosocial needs, are assessed and included in service plans.
- Monitor and analyze Cenpatico activities against CLAS standards.
- Monitor and analyze Cenpatico provider adherence to ADA requirements.
- Monitor and analyze member and provider satisfaction trends in satisfaction with Cenpatico and provider services.
- Monitor, analyze and address trends in member access complaints.

Cenpatico understands the cultural competency, linguistic and disability-related access requirements of members it serves and is committed to ensuring that staff are educated about, remain aware of, and are sensitive to, the linguistic and disability-related needs and cultural differences of its Members. Cenpatico staff is given a copy of the Cultural Competency plan during their training and also have access to the company's website where the policy and procedures are available as well.

Cenpatico implements and sustains the program through multiple individuals throughout the organization who are strongly qualified, both personally and professionally, to meet the cultural needs of the populations served. Cenpatico is committed to hiring and maintaining staff that are bilingual and can communicate verbally with Members. To provide linguistic and culturally competent services, Cenpatico has available telephone interpreter services 24 hours, seven days a week through its Customer Services Help Line, supported after hours by NurseWise, our nurse assistance line, which is available to both Members and providers. Members who are hearing impaired can access Cenpatico staff through market specific, dedicated TDD/TTY services available through the Cenpatico call center.

The Cenpatico network of providers includes providers in each license category who maintain bilingual language capabilities to facilitate communication with patients. This provider group includes significant traditional providers since these providers have experience and relationships with the community, Medicaid/CHIP Members and their service providers in the medical field. Cenpatico ensures that its provider network is culturally competent in the provision of health care to its patients through ongoing training, the credentialing process and on-site visits, and awareness presentations to providers and their staff. Cenpatico also monitors its network through various mechanisms to ensure it is accessible from both a linguistic and disability standpoint. These mechanisms include, but are not limited to: tracking offices sites with bi and multilingual staff; assessment of provider site compliance with the Americans with Disabilities Act (ADA) requirements; review of service plans and assessments through medical record audit information; member satisfaction surveys, complaints and grievances trends.

Cenpatico partners with the state agencies and providers in the markets it serves to ensure that all network building activities and services support culturally and linguistically sensitive services. Cenpatico supports community based and other provider organizations that are expert in providing services to members with all disabilities and needs, including homelessness, vision, hearing, physical and cognitive impairments. Cenpatico will continue to work with state agencies and providers to support and ensure access to culturally sensitive community mental health services for all members.

Cenpatico encourages network providers to use E- Learning online resources for professional and administrative training on increasing cultural sensitivity in their office setting and clinical practice. These tools are introduced to each provider and organization as part of provider orientation.

The Cultural Competency Plan involves the entire organization in addressing members' needs. The QIC and its subgroups develop workable strategies to assess and to implement CLAS standards in each area Cenpatico serves. Cenpatico identified cultural competency as a core staff competency for all persons working within the organization and dedicated improvements to cultural competency skills as a quality improvement activity. At least annually, as part of the evaluation of its provider networks, the Cenpatico QI team assess the demographics of its membership in each market, including US census data; complaints regarding specific access needs such as wheel chair ramps and TDD/TTY availability; and member outcomes data to identify any potential gaps in the service network and to target key providers to ensure access to care. Utilization Management decisions and network adequacy are tracked to ensure that issues related to access and cultural sensitivity do not play a role in the denial of services or in the availability of providers. Cultural competency activities are documented in the annual QI Program Evaluation.