



Cultural Competency Plan & Program Description

Date of Next Review: June 1, 2018

AHCA MMA Contract FP017 Section IV B. 4

I. Introduction

Prestige Health Choice's Cultural Competency Program has been implemented from the inception of the health plan because Prestige recognizes the existence of deep-rooted disparities and bias in the medical industry, as well as the need for health care that more effectively connects with a diverse and multicultural patient population. Addressing these issues through the Cultural Competency Program, allows Prestige Health Choice to successfully accomplish its mission to improve the health status of our communities through the provision of high-quality, affordable, community-based health care to underserved individuals and families by providing support and partnerships with our network of providers.

The role and overall objective of the Cultural Competency Program is to assure that all members are served in a way that is responsive to their cultural and linguistic needs, monitor for disparities among plan members, and carry out corrective actions. The Program utilizes the (15) National Culturally and Linguistically Appropriate Services (CLAS) Standards, developed by the United States Department of Health and Human Services' Office of Minority Health, as the guide and base line of standards.

II. Overall Program Objectives

The Prestige Health Choice Cultural Competency Plan's objectives are based on the National CLAS Standards and are ongoing. These Standards can be found on the Prestige Health Choice website under Provider Resources

The (15) National CLAS Standards are:

Principal Standard:

1. Provide effective, equitable, understandable, and respectful quality care and services that are responsive to diverse cultural health beliefs and practices, preferred languages, health literacy, and other communication needs.

Governance, Leadership, and Workforce:

2. Advance and sustain organizational governance and leadership that promotes CLAS and health equity through policy, practices, and allocated resources.
3. Recruit, promote, and support a culturally and linguistically diverse governance, leadership, and workforce that are responsive to the population in the service area.
4. Educate and train governance, leadership, and workforce in culturally and linguistically appropriate policies and practices on an ongoing basis.

Communication and Language Assistance:

5. Offer language assistance to individuals who have limited English proficiency and/or other communication needs, at no cost to them, to facilitate timely access to all health care and services.
6. Inform all individuals of the availability of language assistance services clearly and in their preferred language, verbally, and in writing.
7. Ensure the competence of individuals providing language assistance, recognizing that the use of untrained individuals and/or minors as interpreters should be avoided.
8. Provide easy-to-understand print and multimedia materials and signage in the languages commonly used by the populations in the service area.

Engagement, Continuous Improvement, and Accountability:

9. Establish culturally and linguistically appropriate goals, policies, and management accountability, and infuse them throughout the organization's planning and operations.
10. Conduct ongoing assessments of the organization's CLAS-related activities and integrate CLAS-related measures into measurement and continuous quality improvement activities.
11. Collect and maintain accurate and reliable demographic data to monitor and evaluate the impact of CLAS on health equity and outcomes and to inform service delivery.
12. Conduct regular assessments of community health assets and needs and use the results to plan and implement services that respond to the cultural and linguistic diversity of populations in the service area.
13. Partner with the community to design, implement, and evaluate policies, practices, and services to ensure cultural and linguistic appropriateness.
14. Create conflict and grievance resolution processes that are culturally and linguistically appropriate to identify, prevent, and resolve conflicts or complaints.
15. Communicate the organization's progress in implementing and sustaining CLAS to all stakeholders, constituents, and the general public.

Prestige Health Choice will ensure the provision of culturally competent care based on the National CLAS Standards through the following program objectives:

- Ensure that members of Prestige Health Choice experience culturally and linguistically competent care that is respectful of their values, preferences, and expressed needs.
- Maintain a diverse workforce across all levels and disciplines that adequately mirrors the demographic characteristics of the service area.
- Provide ongoing education and training on culturally and linguistically appropriate service delivery to staff at all levels and across all disciplines.
- Provide language assistance services, including translation and interpreter services, at no cost to members with Limited English Proficiency (LEP).
- Inform members of their right to free language services.
- Ensure that member materials are provided in their preferred language. Commonly used materials are automatically translated into Spanish and other appropriate foreign languages spoken that comprise 5% of the total population.
- Monitor membership demographics regularly to accurately plan for and implement services that respond to changes in cultural and linguistic characteristics of the service area.

III. Accountability and Reporting Structure

Quality of Service Committee (QSC) provides oversight for the Cultural Competency Program. The QSC provides direction for all aspects related to the delivery of culturally competent care and service quality for Prestige Health Choice. The QSC develops and implements processes to ensure Prestige members, providers and employees are served in a manner that is respectful of and appropriate to their cultural and linguistic needs, regardless of their country of origin, primary language, race or ethnicity and cultural background.

- a. In accordance with 42 CFR 438.206, Prestige Health Choice shall have a comprehensive written Cultural Competency Plan (CCP) describing the program, to ensure that services are provided in a culturally competent manner to all enrollees, including those with limited English proficiency. The CCP must describe how providers, Prestige Health Choice employees and systems will effectively provide services to people of all cultures, races, ethnic backgrounds and religions in a manner that recognizes values, affirms and respects the worth of the individual enrollees and protects and preserves the dignity of each. The CCP shall be updated annually and submitted to the Agency for Health Care Administration (AHCA) by June 1 for approval for implementation and by September 1st of each Contract year.
- b. Prestige Health Choice may distribute a summary of the CCP to network providers if the summary includes information about how the provider may access the full CCP on the Prestige Health Choice's website. This summary shall also detail how the provider can request a hard copy of the Cultural Competency Plan from Prestige Health Choice at no charge to the provider.
- c. Prestige Health Choice shall complete an annual evaluation of the effectiveness of its CCP during the previous Contract year. This evaluation includes results from the Consumer Assessment of Healthcare Providers and Systems (CAHPS®) or other comparative member satisfaction surveys, outcomes for certain cultural groups, member grievances, member appeals, and provider feedback. Prestige Health Choice shall track and trend any issues identified in the evaluation and shall implement interventions to improve the provision of services. A description of the evaluation, its results, the analysis of the results and interventions to be implemented shall be described in the annual CCP submitted to AHCA.

IV. Roles and Responsibilities

Prestige Health Choice's Cultural Competency Program encompasses processes to ensure Prestige members are served in a manner that is respectful of, and appropriate to, their cultural and linguistic needs. Through the coordination of culturally appropriate services and quality improvement interventions, the organization works to reduce healthcare disparities and provide access to high quality care for an increasingly diverse population.

Prestige's process for coordinating culturally and linguistically appropriate services is based on a systemic approach of pre-assessment, analysis, opportunity identification and prioritization, goal-setting, intervention development and post-assessment.

The roles and responsibilities of Prestige's Cultural Competency Program include the following ongoing areas of focus:

- Recruitment.
- Education, Training and Development.

- Language Access Services.
- Member Data.
- HEDIS/CAHPS Analysis .
- Community Outreach/Partnerships.
- Member Complaints.
- Reporting and Evaluation.

Recruitment

Prestige Health Choice is committed to providing members with culturally and linguistically appropriate care and strives to recruit and retain a workforce that reflects the diversity of the communities and members served. Additionally, Prestige works to recruit providers who are culturally sensitive by credentialing providers who reflect the cultural and linguistic needs of Prestige members. This includes providers who speak languages other than English, as well as providers of different ethnic and cultural backgrounds.

Education, Training and Development

Prestige recognizes that a culturally competent organization requires a team that is intimately familiar with the delivery of culturally competent care. A training program has been developed to ensure that personnel at all levels and across all disciplines receive ongoing education and training on culturally and linguistically appropriate service delivery. All new Prestige Health Choice employees receive cultural competency training as part of their orientation to the organization. Additionally, all employees are required to take an online Cultural Competency Training annually. Human Resources ensures that trainings for all associates are completed.

Network providers receive cultural competency training during provider orientation sessions. Provider Network Management team conducts the trainings to ensure all providers understand the importance of culturally competent medical care and how to utilize Prestige's Language Access Services. Provider education is an ongoing activity at Prestige Health Choice that includes information concerning the importance of cultural competence, effective communication with Limited English Proficiency (LEP) members and the providers responsibility for implementing appropriate measures that ensures language, environment or other sensory barriers that could exclude, deny, delay or prevent timely delivery of healthcare or social services, be removed.

Language Access Services

Ensuring that members have access to services in their appropriate language is a primary concern of Prestige. Language access services include, but are not limited to:

- Staffing the Prestige Member Services Call Center with sufficient bilingual staff to accommodate the diverse linguistic needs of membership.
- Providing telephonic interpretation services, free of charge, to any Prestige member who requires language assistance through the Language Associates Language Line. This service provides a fast and

easy way to communicate with LEP members with interpreters in more than 200 languages that are available 24 hours a day, seven days a week.

- Coordinating on-site interpretation for LEP members during provider office visits.
- Providing member materials in their preferred language. Commonly used materials are automatically translated into Spanish, other materials are translated upon request, and all member materials indicate the availability of translated documents.
- Deployment of a client/server application to support handling of Text Telephone (TTY) and Telecommunication Device for the Deaf (TDD) phone calls. This application is loaded on all customer service representatives' desktops. Any customer service representative is equipped to handle an incoming TTY/TDD call.

Competency of Language Access Services

It is the policy of Prestige Health Choice to communicate with members in their preferred language in a timely manner. Prestige accommodates this function through internal policies and procedures as well as its contracts with subcontracted interpretation and translation vendors. Prestige monitors members' preferred languages to identify new linguistic trends to assess any required changes in services, as necessary.

To ensure accurate, objective, and confidential communication, Prestige Health Choice never requires or suggests family, friends, or other unqualified individuals be utilized as interpreters. Prestige contracts with competent interpreters and translators that utilize internal quality control measures to ensure the accuracy of the language services provided. Prestige Health Choice utilizes external translation services for all written materials, as required.

Prestige Health Choice understands the necessity for staff performing bilingual functions to be fully proficient and qualified. Bilingual staff communicating directly with members in their preferred language must demonstrate a defined level of proficiency in both English and the member's preferred language. Prestige Health Choice has established a formal testing program for bilingual staff members to ensure their competency as part of the human resource hiring procedure.

Prestige Health Choice conducts CAHPS® member satisfaction surveys on an annual basis. The survey includes questions to determine if the member has received information in their language and if it was understandable. The survey is conducted to ensure members have an accurate and positive experience with applicable services. Additional questions related to cultural competency have been added to the survey.

Member Data

The Prestige Health Choice Analytics Department produces membership data by region, race, ethnicity, age, gender and language. Membership Demographic data is monitored biannually to accurately plan for, and implement services that, respond to cultural and linguistic characteristics of the service area.

HEDIS/CAHPS Analysis

Prestige Health Choice Analytics Department is working on a report to analyze HEDIS data by race, ethnicity, gender, and language to better identify healthcare disparities in our membership. Member Satisfaction Surveys are also conducted on an annual basis. The survey includes questions to determine

if the member has received information in their language and if it was understandable. Questions are asked pertaining to the availability of finding a culturally competent provider, availability of finding a provider who speaks their language, and availability of finding a healthcare professional that met their racial needs or preferences. The survey is conducted to ensure members have an accurate and positive experience with applicable services.

Community Outreach/Partnerships

Prestige Health Choice is committed to developing participatory, collaborative partnerships with community agencies. Prestige will utilize membership data collected through multiple resources to participate and plan community special events.

Member Complaints

Prestige Health Choice monitors member complaints to identify any cultural and/or linguistic related issues to identify opportunities for improvement concerning service delivery. Prestige continuously works to ensure that complaint and grievance resolution processes are culturally and linguistically sensitive. In an effort to identify, prevent and resolve cross-cultural conflicts or complaints by members, Prestige ensures that:

- a. All communication materials, including denial letters, are provided with instructions detailing how to access member materials and/or assistance in the member's preferred language.
- b. Member Services staff are available to assist members throughout the complaint process, including the provision of any interpretation services that may be required.
- c. Any trend in member complaints related to cultural competency are directed to the QSC Committee for review.

Reporting and Evaluation

Prestige Health Choice prepares a Cultural Competency Plan and Program Description, and Evaluation that is submitted to AHCA annually. Prior to yearly submissions, the documents are distributed to the QSC committee for review and approval. All cultural competency related policies and procedures are reviewed and approved by QSC.