



Cultural Competency Strategic Plan

2019 Medicaid

Table of Contents

Mission, Vision, & Commitment	3
Introduction	3
Cultural Competence	4
Legal and Regulatory Framework	4
Title VI of the Civil Rights Act of 1964	4
Federal Executive Order 13166	4
1557 Non-Discrimination Law	4
Culturally and Linguistically Appropriate Services (CLAS) Standards	4
Principal CLAS Standards and Themes	5
Principal (CLAS) Standards	5
Theme One - Governance, Leadership and Workforce	5
Theme Two - Communication and Language Assistance	5
Theme Three - Engagement, Continuous Improvement and Accountability	5
Strategic Goals and Objective	6
Delivery of Care and Services	7
Education and Training	8
Translation Service	8
Evaluation and Assessment	9
Acknowledgement and Approval	9

Mission, Vision, & Commitment

Mission:

Peach State Health Plan is driven by our community responsibility to positively impact the health and wellness of those we serve.

Vision:

Peach State Health Plan will be the vehicle for population health for the state of Georgia.

Community Commitment:

Peach State Health Plan has a continuous history of providing low cost quality healthcare to all members.

Introduction

Peach State Health Plan™ (Peach State, The Plan) and its parent company Centene Corporation actively address Cultural Competence and awareness, through a collaborative process with Centene Foundation for Quality Healthcare, and partnerships with the Center for Health Care Strategies, Centers for Medicaid and Medicare Services (CMS) and the Georgia Department of Community Health (DCH).

Peach State serves a diverse, multi-cultural population throughout Georgia and is committed to providing safe, quality, and low-cost services to members through family centered care, with the goal of improving the health of the population it serves. For this reason that Peach State has committed to developing a system that can effectively provide services to citizens of all cultures, races, ethnic backgrounds, sexual identity, orientation and religions in a manner that recognizes values, and affirms and respects the worth of the individual enrollees and protects and preserves the dignity of each.

We believe that by addressing the cultural and linguistic needs of our enrollees, it will improve access to care, quality, and ultimately health outcomes. This will be achieved through the development of our annual Cultural Competency Plan as well as an evaluation tools to determine if implementation of the program is effective.

Peach State raises awareness regarding culturally sensitive care, through the Cultural Competence Program, by acknowledging the importance of valuing different cultures and the ways in which these differences influence how care is provided. Additionally, expanding access to meet the needs are key factors to bridging the gap to health inequalities.

Developing language skills and cultural knowledge are critically important skills that Peach State and its network of providers must embrace in order to provide quality care and positively influence and change the issues surrounding health disparities. The ability to influence culturally and linguistically appropriate services is paramount to the delivery of quality healthcare.

The Plan recognizes the impact that social determinants have on health outcomes of specific populations—and is aware of the disparities they create. Race or ethnicity, sex, sexual orientation and identity, age, disability, socioeconomic status, and geographic location all contribute to an individual's ability to achieve good health.

This Cultural Competency Plan (CCP) serves as the blue print to assist Peach State Health Plan in its ongoing efforts to provide culturally competent and linguistically appropriate awareness, services and tools to all stakeholders, including Plan-wide staff, contracted providers and contracted vendors staff at all levels. Incorporating the CCP with accountability throughout the organization's planning and operations, will support business operations in providing equitable, understandable, and respectful quality care and services to the health plan diverse membership. This CCP further demonstrates Peach States' commitment to meeting needs of our members, providers, residents of Georgia, and the Department of Community Health (DCH).

Peach State Health Plan has a contracted partnership in Georgia with the Department of Community Health (DCH) and Centers for Medicaid and Medicare Services (CMS).

Cultural Competence

Cultural Competence is the willingness and ability of a health care plan to value the importance of culture, ethnicity, race and religion in the delivery of services which enables them to work effectively across different cultures. It is the use of a systems perspective which values differences and are responsive to diversity at all levels of the health plan.

Cultural Competence requires a comprehensive and coordinated plan that includes interventions on levels of policy making, infrastructure, program administration and evaluation, the delivery of services and the population it serves. It is the promotion of quality services to underserved, racial/ethnic groups through the valuing of differences and the integration of cultural attitudes, beliefs, and practices into diagnostic and treatment methods. It should be practiced throughout the health plan to support the delivery of culturally relevant and competent care.

Cultural Competency skills can be developed through training both staff and providers. It also includes the implementation of objectives to ensure that administrative policies and practices are representative of the culture and diversity within the populations served. It is a process of continuous quality improvement.

Legal and Regulatory Framework

Peach State Health Plan adheres to four major Federal standards related to Cultural Competency, *Title VI* of the *Civil Rights Act of 1964*, federal *Executive Order 13166*, *Affordable Care Act, section 1557 non-discrimination*, and *CLAS 15 national standards*. Additionally, the Georgia Department of Community Health (DCH) has requirements relating to Cultural Competency that Peach State Health Plan will follow.

Title VI of the Civil Rights Act of 1964

Title VI of the *Civil Rights Act of 1964* states that entities, such as companies or corporations, receiving federal financial assistance shall not do any of the following based on protected status:

- ☉ Deny an individual a service, aid or other benefit
- ☉ Provide a benefit that is different or is provided in a different manner
- ☉ Subject an individual to segregation or separate treatment
- ☉ Restrict an individual in the enjoyment of benefits, privileges, etc.
- ☉ Treat an individual differently when determining eligibility
- ☉ Select sites or facility locations that exclude protected individuals

Federal Executive Order 13166

As an organization that receives federal financial funding, Centene Corporation must comply with *Title VI* of the *Civil Rights Act of 1964* as well as *Executive Order 13166*, which sets forth that persons with limited-English language skills have meaningful access to services.

1557 Non-Discrimination Law

Section 1557 of the Affordable Care Act (ACA), prohibits discrimination on the basis of race, color, national origin, sex, age, or disability and builds upon longstanding nondiscrimination laws and provides new civil rights protections.

Culturally and Linguistically Appropriate Services (CLAS) Standards

National CLAS 15 Standards, developed by the U.S. Department Health & Human Services, Office of Minority Health, as our guidelines for furnishing equitable and culturally competent services to all members,

by improving quality and eliminating health care disparities through the CLAS standards organized below into one Principal Standard and three themes:

- ☞ Governance, Leadership, and Workforce;
- ☞ Communication and Language Assistance; and
- ☞ Engagement, Continuous Quality Improvement, and Accountability.

Principal CLAS Standards and Themes

Principal (CLAS) Standards

The CLAS Standards 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.

Theme One - Governance, Leadership and Workforce

- ☞ **Standard 1** - Advance and sustain organizational governance and leadership that promotes CLAS and health equity through policy, practices and allocated resources.
- ☞ **Standard 2** - Recruit, promote and support a culturally and linguistically diverse governance, leadership and workforce that are responsive to the population in the service area.
- ☞ **Standard 3** - Educate and train governance, leadership and workforce in culturally and linguistically appropriate policies and practices on an ongoing basis.

Theme Two - Communication and Language Assistance

- ☞ **Standard 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.
- ☞ **Standard 6** - Inform all individuals of the availability of language assistance services clearly and in their preferred language, verbally and in writing.
- ☞ **Standard 7** - Ensure the competence of individuals providing language assistance, recognizing that the use of untrained individuals and/or minors as interpreters should be avoided.
- ☞ **Standard 8** - Provide easy-to-understand print and multimedia materials and signage in the languages commonly used by the populations in the service area.

Theme Three - Engagement, Continuous Improvement and Accountability

- ☞ **Standard 9** - Establish culturally and linguistically appropriate goals, policies and management accountability, and infuse them throughout the organizations' planning and operations.
- ☞ **Standard 10** - Conduct ongoing assessments of the organization's CLAS-related activities and integrate CLAS-related measures into assessment measurement and continuous quality improvement activities.
- ☞ **Standard 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.
- ☞ **Standard 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.
- ☞ **Standard 13** - Partner with the community to design, implement and evaluate policies, practices and services to ensure cultural and linguistic appropriateness.
- ☞ **Standard 14** - Create conflict- and grievance-resolution processes that are culturally and linguistically appropriate to identify, prevent and resolve conflicts or complaints.
- ☞ **Standard 15** - Communicate the organization's progress in implementing and sustaining CLAS to all stakeholders, constituents and the general public.

Strategic Goals and Objective

Peach State Health Plan is dedicated to reducing health care disparities and achieving health equity through a coordinated, multidisciplinary strategy aligned with the National Partnership for Action to End Health Disparities. The 2019 strategy focuses on:



To achieve the goals, Peach State Health Plan implements the National CLAS standards which are intended to advance health equity, improve quality, and help eliminate health care disparities.

Goal 1: Awareness

Increasing awareness of the significance and impact of health disparities, and the necessary actions to improve health outcomes for marginalized and underserved populations.

- ✧ Utilize Snapcom to promote and engage associates in the discussion and understanding of the importance of health disparities, and how Peach State Health Plan associates assist in improving the health outcomes for marginalized and underserved populations.

Goal 2: Leadership

Developing and promoting health equity leadership throughout the organization to address health disparities and promote health equity solutions at all levels.

- ✧ Recruit, promote, and support a culturally and linguistically diverse governance, leadership, and workforce that are responsive to the population in the service area.
- ✧ Educate and train governance, leadership, and workforce in culturally and linguistically appropriate policies and practices on an ongoing basis.

Goal 3: Health System & Life Experience

Improving health and health outcomes for marginalized and underserved populations

- ✧ Offer language assistance to individuals who have limited English proficiency and/or other communication needs
- ✧ Inform all individuals of the availability of language assistance services clearly and in their preferred language, verbally and in writing.
- ✧ Provide easy-to-understand print and multimedia materials in the languages commonly used by the membership populations (English & Spanish).

Goal 4: Cultural & Linguistic Competency

Improving cultural and linguistic competency of our diverse workforce that better reflects and can better serve the needs of our customers

- ✧ Hire an EPSDT Coordinator with certification in Medical Spanish Translation and Interpretation
- ✧ Investigate providing all HALO and EPSDT staff with basic healthcare Spanish courses
- ✧ Provide annual Cultural Competency training to all associates

Goal 5: Data, Research & Evaluation

Continue to utilize data to help build and optimize solutions for improved outcomes

- ✧ Conduct ongoing assessments of the membership to ensure appropriate programs are in place to address member cultural and linguistic needs (PHM Evaluation and Plan)
- ✧ Conduct ongoing assessments of the organization's CLAS-related activities and integrate CLAS-related measures into measurement and continuous quality improvement activities.
- ✧ 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.
- ✧ Create conflict and grievance resolution processes that are culturally and linguistically appropriate to identify, prevent, and resolve conflicts or complaints.
- ✧ Communicate the organization's progress in implementing and sustaining CLAS to all stakeholders, constituents, and the general public.

Delivery of Care and Services

Peach State has staff available to meet the cultural and linguistic needs of its member populations. These staff members provide culturally sensitive information to members and have the linguistic skills required for meeting the needs of all enrollees. If staff is not available for a non-prevalent language, outside interpretative services are used to meet the need of the individual enrollee. The Plan will implement a new

report for the Enrollee Services Department; the report will capture complaints relating to cross-culture issues, which will be referred to the Quality Improvement Department for review, to be addressed appropriately. Peach State educates its providers on the availability of interpretative services as well.

The Plans' Provider Credentialing Applications also capture the capacity to recruit providers of diverse racial and ethnic background by documenting the provider's self-identified ethnicity, culture and race (if provided). The Application also includes a question about other languages spoken by providers to indicate their linguistic diversity – this information is used in the provider directory for informational purposes to enrollees.

This information is available via www.pshpgeorgia.com and is updated periodically. Peach State monitors the delivery of care and services in relation to the provision of culturally competent services through a comprehensive set of Quality Methods that includes, but is not limited to, Performance Improvement Plans, Medical Record Reviews, Enrollee Satisfaction Surveys and Provider Satisfaction Surveys.

Education and Training

All staff and network providers are required upon hire, and annually thereafter, to complete Diversity and Cultural Competency Training. Contracted Providers' offices will be responsible for providing cultural competency training for all office personnel and staff.

Peach State Health Plan provides training materials for all network Providers at no cost to the provider. The training material will include ideas and assistance providers about how to service the member's health care needs in a culturally competent manner.

Providers can access educational materials through the www.pshpgeorgia.com following website.

Translation Service

Addressing linguistic and cultural issues requires multi-faceted strategies. Peach States' first contact with the new enrollee begins with the Welcome Letter. The Plan sends mailings in English and Spanish, the prevalent languages in our service network, with a special adage that states that materials are available in other languages or formats if needed. Translations needed in a language or format other than those prevalent in the area are provided based on the individual enrollee's needs. The Plan also utilizes bilingual staff and interpreter phone service to facilitate communication with non-English speakers. The interpreter phone service is a secondary language access service that allows the health plan to communicate with those non English, non-Spanish, enrollees. Peach State uses the following interpreter phone service vendors listed below:

- 📞 Professional Linguistics
- 📞 Lingua Language Services
- 📞 Language Services of America
- 📞 Voiance

Spanish and Burmese languages and cultures are the most prevalent in the Peach States' service area at this time. We ensure our Enrollee Services representatives are able to communicate with the enrollees in English, Spanish, and Creole.

The following websites are available to the Peach State staff and network providers for translation services but are not limited to:

- 📞 U.S. Census Bureau developed an "I Speak" document that has the following statement
 - In 38 languages: "Mark this box if you read or speak (language)."
 - <http://www.justice.gov/crt/about/cor/Pubs/ISpeakCards.pdf>
- 📞 Online resource that provide an index to more than 6,900 known living languages
 - <http://www.ethnologue.com/>

Evaluation and Assessment

Peach State Health Plans' Quality Improvement Department (QI) implements ongoing initiatives to identify and address disparities in health care. The QI department is charged to identify network gaps related to cultural and or ethnic needs and preferences and provide information to Provider Relations if availability issues are identified. Additionally, QI leads the annual Evaluation efforts of the effectiveness of its Cultural Competency Program.

Results of this evaluation are used to determine the future direction of the Cultural Competency Plan and Program. This evaluation may include results from the Enrollee Satisfaction Surveys, Member Grievances, Member Appeals, Provider feedback, medical record reviews, Performance Improvement Plans, Performance Measures and the Plans' employee surveys.

Quality Improvement tracks and trends any issues, and the number of cross-cultural complaints, grievance or appeal cases identified in the evaluation and implementation of interventions to improve the provision of culturally competent services if needed. Peach State Health Plan will continue to promote cultural competent communication and service delivery throughout our networks.

Acknowledgement and Approval

The annual 2019 Cultural Competency Strategic Plan has been reviewed and approved by the Quality Oversight Committee (on June 26, 2019) and will be presented to the Peach State Health Plan Board of Directors.



Michael D. Strobel MPA, MA, LMHC
Vice President, Quality Improvement
Peach State Health Plan

Date Signed 06/26/2019