

Freedom Health

CULTURAL COMPETENCY PROGRAM – 2018

Cultural Competency Program (CCP) Overview and Goals

Freedom Health (the Plan) has a strong commitment to diversity in its members, providers, employees, and the communities it serves. Implementing a strong Cultural Competency Program (or CCP) in healthcare delivery allows the Plan to address the following goals of cultural competency:

- Provide health care services to all Plan members in a culturally competent manner;
- Help providers recognize the diverse needs of members so that they may contact the Plan to arrange appropriate assistance in order to deliver culturally competent health care and services;
- Improve network adequacy to meet the needs of underserved groups;
- Meet cultural needs (race, ethnic background, and religion) of Plan members for all services and in all settings;
- Identify and provide linguistically appropriate services to members with limited or no English proficiency;
- Make resources available to meet members language and communication barriers;
- Respond to demographic changes in the member population;
- Eliminate disparities in the health status of members of diverse backgrounds;
- Reduce health care disparities in clinical areas;
- Improve the quality of healthcare services provided and health outcomes;
- Improve cultural competency in materials and communications; Demonstrate leadership in the healthcare market;
- Increase member, provider and employee satisfaction; and
- Recognize, value, affirm, and respect the worth of the Plan's individual members, protecting and preserving their dignity; and
- Improve other areas of needs the organization deems appropriate.

The Plan believes that when health care services are delivered without regard for cultural differences, patients are at risk for sub-optimal care. Patients may be unable or unwilling to communicate their healthcare needs in a culturally insensitive environment, reducing the effectiveness of the healthcare process. Understanding the fundamental elements of culturally and linguistically appropriate services is necessary when striving for cultural competency in healthcare delivery.

Definition of Cultural Competency

Cultural Competency is defined as a set of congruent behaviors, attitudes, and policies that come together in a system, agency, or among professionals and enable them to

Freedom Health

CULTURAL COMPETENCY PROGRAM – 2018

work effectively in cross-cultural situations. Cultural competency occurs in both clinical and non-clinical areas of the Plan. In the clinical area, it is based on the patient-provider relationship. In the non-clinical arena, it involves organizational policies and interactions that impact health care services.

Plan Strategies for Cultural Competency - 2018

The Plan facilitates linguistically appropriate services and cultural competency throughout the organization by implementing the following strategies related to cultural diversity:

- Collect comprehensive data about members' cultural, racial, language, and ethnicity characteristics through enhanced initial and annual health assessments, and population assessments.
- Address requests from members for providers to meet specific cultural, racial, ethnic, or language needs, should the Plan receive them.
- Evaluate the provider network at least annually for ability to meet the cultural, racial, ethnic and language needs of the membership and take action to adjust the availability of practitioners within the network, if necessary.
- Develop improvement interventions that impact culturally and/or linguistically appropriate services to member.
- Encourage diversity in hiring practices and in organizational policies and procedures, including the assessment of language skills in potential employees and hiring of bilingual staff that interact with members directly or indirectly.
- Partner with external organizations and programs that support diversity and provide resources such as diversity programs, as those programs are available;
- Increase awareness of providers and subcontractors about cultural competency through the distribution of appropriate information.
 - Network providers receive cultural competency information, as part of their Provider Manual and other written materials.
 - Educate providers and subcontractors about the CCP and their responsibility for compliance with the CCP.
- Provide a complete copy of the CCP to participating providers through the Plan website, including a hard copy of the complete CCP upon request at no charge.
- Provide accessible and appropriate linguistic services to members, including:
 - Bilingual member services call center staff
 - An on-demand Interpreter service at no cost to all members as needed
 - Interpreter services include verbal translation and interpretation provided through an authorized vendor and coordinated through the Plan's Member Services Department.

Freedom Health

CULTURAL COMPETENCY PROGRAM – 2018

- Call center staff monitored for compliance with departmental protocols regarding use of interpreter services or conducting a TTY/TDD call.
- Monitor complaints/grievance cases where members report that their cultural or linguistic needs were not met;
 - The Appeals & Grievance Department tracks and trends Member grievances, including any cultural or linguistic issues.
 - The Appeals & Grievance Department addresses member complaints and grievances in conjunction with the Provider Relations staff.
- Integrate multi-cultural education into the Plan's case management member outreach programs and other member educational initiatives as requested and as applicable to the Plan's population.
 - Common written materials such as case management letters and educational materials are available in Spanish and materials can be developed in additional languages, as applicable to the member population in the Plan's service area.

On an annual basis, review research regarding the effect of cultural competency in the care setting and disease specific race and ethnicity data, as measured by clinical outcomes, including but not limited to U.S. Census information, the Office of Minority Health (<https://minorityhealth.hhs.gov/omh/browse.aspx?lvl=1&lvlid=6>), the Health Resources and Services Administration (HRSA) of the U.S. Department of Health & Human Services website for Culture, Language and Health Literacy (<https://www.hrsa.gov/cultural-competence/index.html>), and the Agency for Health Care Administration's website (<http://ahca.myflorida.com>) which has a link to Georgetown University's National Center for Cultural Competence. This tool offers a valuable resource to organizations and individuals developing, implementing and/or evaluating a Cultural Competency Plan (<https://nccc.georgetown.edu/assessments/>).

Annual Evaluation of Cultural Competency Program Effectiveness

The Plan evaluates the strategies from the previous year during the first quarter of each year to determine their effectiveness toward meeting cultural competency goals. The staff analyzes data results to identify and monitor issues, trends or patterns, and make recommendations for interventions and action plans. Data sources include:

- Comprehensive data about members cultural, racial, language, and ethnicity characteristics through enhanced initial and annual health assessments, and population assessments;
- Call center staff linguistic services;

Freedom Health

CULTURAL COMPETENCY PROGRAM – 2018

- Member complaints/ grievances where members report their cultural or linguistic needs were not met;
- Requests regarding multi-cultural education
- Other available sources of data related to culture, race, ethnicity and language.

The results of analysis are included in the annual Cultural Competency Program Evaluation. The evaluation includes interventions and action plans to be implemented to improve the provision of services. The Cultural Competency Program for 2018 is updated to include new annual strategies to meet cultural competency requirements.

Oversight of the Cultural Competency Program

The CCP is closely aligned with the Plan's Quality Management Program, and shares goals and strategies with that Program.

The Quality Management Steering Committee (QMSC) is responsible for the oversight of company-wide development and implementation of an effective Cultural Competency Program.

The QMSC reviews and approves the Cultural Competency Program and the Cultural Competency Program Evaluation for the previous year. Cultural diversity activities and metrics are reported at least annually to the Quality Management Steering Committee, for review and recommendations for program improvements and plan activities. Quarterly reports are provided for selected strategies. The Cultural Competency Program and Evaluation are updated annually.

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