CARESOURCE PASSE™ CULTURAL COMPETENCY & HEALTH EQUITY PLAN 2023



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CareSource PASSE Commitment to Cultural Competency & Health Equity

CareSource PASSE is a provider-led partnership with a commitment to transforming the delivery of care for its members by creating innovative community solutions focused on a person-centered approach and engagement through caregivers, providers, and community-based organizations. We are committed to addressing the need for culturally competent care in our member populations, including exploring the social determinants of health that impact member health outcomes and quality of life.

Our commitment to cultural competency aligns with our mission to make a lasting difference in our members' lives by improving their health and well-being. It is our responsibility to understand the unique needs of our members and their psychosocial barriers to navigating the health care system.

We recognize that across the state of Arkansas our members come from diverse cultures, races, ethnic backgrounds, and religions and have varied needs. Many have suffered from a range of chronic and acute health conditions and limited access to health care. Some are reluctant to seek treatment for their behavioral health, substance use and medical conditions. Others prefer to see a health partner of their own ethnicity and gender. Many require assistance in understanding prescriptions, treatments, appointment slips, informed consent documents and other components and nuances of today's health care system.

Our members need and receive compassion and assistance navigating the health care system in one form or another. Services will be provided in a manner that values and affirms the worth of each member and preserves and protects each member's dignity.

HEALTH EQUITY

Health inequities are reflected in differences in length of life; quality of life; rates of disease, disability, and death; severity of disease; and access to treatment. According to the Centers for Disease Control and Prevention, "Health equity is achieved when every person has the opportunity to 'attain his or her full health potential' and no one is 'disadvantaged from achieving this potential'

because of social position or other socially determined circumstances'." Health equity enables everyone to achieve their full health potential.

CULTURALLY AND LINGUISTICALLY APPROPRIATE SERVICES

Language and cultural differences have the potential to negatively impact interactions between members, staff, and healthcare providers and lead to health disparities. As our member populations become more diverse, the need for the delivery of culturally and linguistically appropriate services is paramount. CareSource PASSE is committed to ensuring the provision of culturally and linguistically appropriate services in alignment with the National Culturally and Linguistically Appropriate Services (CLAS) Standards.

The National CLAS Standards are intended to advance health equity, improve quality, and help eliminate health care disparities by establishing a blueprint for health and health care organizations to 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. [Office of Minority Health, U.S. Department of Health & Human Services, 2018]

CareSource PASSE utilizes CLAS standards to implement the provision of culturally and linguistically competent services to members by CareSource staff and by CareSource PASSE health partners. Utilization of these standards to guide service provision ensures mutual understanding of health, illness and treatment, increased member satisfaction, and improves the quality of health care.

Provision of Culturally Competent Services to CareSource PASSE Members

Care Source PASSE Care Coordinators assist our members in navigating the health care system. Care Coordinators and other staff are culturally sensitive to our members and the issues they face and are cognizant of this sensitivity when helping to overcome barriers to health care. Each member's experience is respected, and each member is treated with dignity.

Staff receive ongoing education and training in meeting the needs of culturally diverse and economically disadvantaged individuals and in culturally and linguistically appropriate service delivery. CareSource is committed to ensuring that its staff are educated about, cognizant of, and sensitive to the needs and cultural differences of its members. CareSource staff engagement and training opportunities include:

- Mandatory onboarding training that focuses on aspects of Cultural Competency (example: Diversity, Equity, and Inclusion)
- Availability of subject-specific online training (example: CLAS-Culturally & Linguistically Appropriate Services Standards)
- Continuing education on Cultural Competency
- Poverty simulation experiences
- Participation in CareSource Foundation activities

In addition, all staff receive training on and are expected to comply with the CareSource PASSE Cultural Competency & Health Equity Plan. They can easily access the full content of this CareSource Cultural Competency & Health Equity Plan via the PASSE website.

HEALTH PARTNERS

Participating health partners are expected to provide services in a culturally competent manner, which includes removing all language barriers to service and accommodating the unique ethnic, cultural, and social needs of the member. They are also expected to remove barriers in order to

provide full and equal access to buildings and ensure safe and appropriate parking and internal site navigation. They must meet the requirements of all applicable state and federal laws and regulations as they pertain to provision of services and care.

CareSource PASSE prohibits its providers or partners from refusing to treat, service or otherwise discriminate against an individual because of race, color, religion, national origin, sex, age, gender orientation (i.e., intersex, transgendered and transsexual) or disability.

In consideration of cultural differences, including religious beliefs and ethical principles, CareSource PASSE will not discriminate against health partners who practice within the permissions of existing unprotections in provider conscience laws, as outlined by the United States Department of Health and Human Services (HHS).

CareSource PASSE requires its health partners to fully comply with its Cultural Competency & Health Equity Plan. A summary of our approach to cultural competency and health equity is documented within the Provider Handbook and on the CareSource PASSE website. We provide a link to our website for providers so they can access the full content of this CareSource Cultural Competency & Health Equity Plan. An email copy is available upon request at no cost to the provider.

Linguistic Services and Written Materials

For members who need assistance communicating with us or their health partner, the member, her or his representative, or a health partner can call Member Services or their Care Coordinator to assist or arrange for needed services. These services are free of charge.

LINGUISTIC SERVICES FOR MEMBERS WITH LIMITED ENGLISH (LEP) OR WHOSE PRIMARY LANGUAGE IS NOT ENGLISH

All interpretive services (and materials) are provided to our members regardless of whether the member speaks a language that meets the threshold of a Prevalent Non-English Language.

Language interpreter services are available at all points of contact to members with limited English proficiency or whose primary language is not English. Language Line Services are available and provide telephonic interpreters for over 170 languages.

LINGUISTIC SERVICES FOR MEMBERS WHO ARE DEAF, HARD OF HEARING, OR WITH A SPEECH DISABILITY

Sign Language Interpreter services for deaf and hard of hearing members are made available upon request and are free of charge.

Assistance with telecommunications services is also available. Persons who are deaf, hard of hearing, or with a speech disability may dial 711 on their phone and will be automatically connected to a Communications Assistant (CA). The CA facilitates telephone calls between persons who are deaf, hard of hearing, or have speech disabilities and other individuals.

These federal services are free of charge:

 TeleTYpe (TTY) enables persons who are deaf or hard of hearing to make and receive telephone calls. A TTY is a communications device that lets persons who are deaf, hard of hearing, or with a speech disability to use the telephone to communicate by allowing them to send and receive typed text messages. TTYs connect to a standard phone line. and use keyboards for typing messages and screens for displaying messages. The text is read on either (or both) a display screen or a paper printout. If the person who is deaf or hard of hearing has a TTY device, but the other party does not, the person can 711 and a CA can connect to and relay the call between the parties by speaking what a text user types and typing what a voice telephone user speaks.

 Speech to Speech (STS) service enables persons with a speech disability to make or receive telephone calls using their own voice (or an assistive voice device) using a CA. In general, anyone with a speech disability or anyone who wishes to call someone with a speech disability can use STS. The calling party calls the relay center by dialing 711 and informs the CA they would like to make an STS call or asks the CA to place an STS call to the person with a speech disability.

PRINTED MEMBER MATERIALS

In order to enhance communication and help members improve their health outcomes, we make every possible effort to ensure that our member materials are easy to read and understand Printed member materials are available in multiple languages and formats, such as large print (at least 16-point font), braille, and compatible with optical recognition software. These materials are available upon request and are free of charge. Notices and other written materials may be read aloud to individuals upon request.

In addition, CareSource utilizes the Health Literacy Advisor (HLA) software developed by Health Literacy Innovations[™] to measure the reading level of all member materials and to ensure that the reading level of written documents is at or below the targeted level of sixth grade or below comprehension level on the rating scale, per State requirements.

MEMBER AND HEALTH PARTNER NOTIFICATIONS

Members and health partners are educated about the availability of and how and when to access these linguistic services via the CareSource PASSE website, Member and Provider Handbooks, trainings, marketing materials, and information provided directly to members by Care Coordinators and service providers

Key Strategies

As a PASSE, our commitment to cultural competency is demonstrated by communicating appropriately, recognizing our members' cultural needs and preferences, and ultimately making a personal connection to help improve the member's long-term health. We expect our health partners to also demonstrate commitment to cultural competency. Key strategies are addressed through the Cultural Competency & Health Equity Plan.

KEY STRATEGIES TO DEVELOPING CULTURAL COMPETENCY AND HEALTH EQUITY BY THE PASSE

- 1. Develop and maintain demographic description, including cultural and linguistic profiles, of membership in order to respond to service needs.
- 2. Understand the cultural and linguistic demographics of our members, individually and as a population, and address barriers.
- 3. Develop culturally and linguistically appropriate services, as well as written materials, to meet the literacy, language and communication needs of our membership.
- 4. Ensure that members are aware of their rights and the services available to them through our PASSE and our health partners.
- 5. Educate and train staff and health partners on cultural competency and health equity.
- 6. Monitor and review CAPHS surveys, quality of care concerns, complaints, grievances, and appeals, and other member feedback for culturally and linguistically sensitive and access issues, as well as staff, health partner, and community feedback.
- 7. Review the health partner network to ensure member availability to CareSource health partners who provide physical access, reasonable accommodations, and accessible equipment for those with physical and mental disabilities and can meet the linguistic and

- cultural needs of our members; ensure this health partner information is maintained in the PASSE Provider Directory.
- 8. Identify community advocates and agencies who can provide culturally competent services; collaborate to facilitate involvement in designing and implementing CLAS-related activities.

KEY STRATEGIES TO DEVELOPING AND ENSURING CULTURAL COMPETENCY AND HEALTH EQUITY BY OUR HEALTH PARTNERS

- Health partners will report capabilities to meet identified cultural and linguistic needs and
 preferences of members, such as bilingual staff/healthcare providers/skilled medical
 interpreters; service providers with expertise in gender issues and any culture-specific
 specializations; and whether the office/facility has accommodations for individuals with
 physical disabilities (including offices, exam rooms, and equipment).
- 2. Health provider office staff will make reasonable attempts to collect race-and languagespecific member data. Staff will be available to answer questions and explain race/ethnicity categories to a member, to assure accurate identification of race/ethnicity for all family members.
- 3. Locations will meet requirements of the ADA and local requirements as they relate to adequate space, supplies, sanitation, and fire/safety procedures in order to ensure that all members have equal access to services.
- 4. Health care will be provided with consideration of the members' cultural background, encompassing race, ethnicity, language and health beliefs, as cultural considerations may impact/influence member health decisions related to preventable disease or illness.
- 5. Treatment plans will be developed based on evidence-based clinical practice guidelines with consideration of the member's race, country of origin, native language, social norms, religion, mental or physical abilities, heritage, acculturation, age, gender, sexual orientation, and other characteristics that may result in a different perspective or decision-making process.
- 6. Health partner staff will be knowledgeable and inform members of free and available linguistic services and will assist members in accessing those services.

CareSource PASSE Cultural Competency Plan and Annual Evaluation

A Summary of the CareSource PASSE Cultural Competency & Health Equity Plan is included in the Provider Manual and is distributed to all participating providers. The summary also provides information regarding accessing the Plan on the website, requesting a copy via email, and requesting a hard copy of the Plan at no charge.

Goals and Objectives of the Plan are developed to reflect the PASSE's commitment to cultural competency and health equity. They are intended to align with key strategies that will result in the fulfillment of the PASSE's intentions to transform the delivery of care for its members by creating innovative community solutions focused on a person-centered approach and engagement through caregivers, providers, and community-based organizations and addressing the need for and delivery of culturally competent care to our members.

The Plan is evaluated on an annual basis. The evaluation utilizes member, health partner, community, and employee feedback and results from CAHPS and other member satisfaction surveys and complaints, grievances, and appeals, as well as relevant quality of care concerns. The Evaluation includes a description of (a) progress or lack of progress toward identified goals and objectives (and analysis of successes and challenges), (b) identification of any relevant trending issues to be addressed in the Plan, and (c) planned interventions to be implemented to improve provision of culturally competent services to members.

APPENDIX A

RESOURCES FOR EDUCATION AND TRAINING IN CULTURAL COMPETENCY & HEALTH EQUITY

Health equity, and cultural and linguistic barriers are addressed proactively through training programs for staff, members, and health partners. This Cultural Competency and Health Equity Plan provided guidance to move us forward in addressing the needs of our members

CareSource PASSE provides both staff and health partners with resources and materials, including tools from health-related organizations that inform culturally competent care. In order to better understand and serve our diverse populations, CareSource PASSE staff and health partners are encouraged to utilize the following sites for information and training:

- CareSource PASSE Cultural Competency & Health Equity Plan: https://www.caresource.com/documents/ar-pas-p-1677950-2023-cultural-competency-and-health-equity-plan/
- Centers for Disease Control and Prevention, Health Equity, provides information on healthy equity and racial/ethnic disparities: https://www.cdc.gov/chronicdisease/healthequity/index.htm
- CMS, Guide to Developing a Language Access Plan, provides guidance for healthcare providers of services to persons with limited English proficiency: https://www.cms.gov/About-CMS/Agency-Information/OMH/Downloads/Language-Access-Plan-508.pdf
- Federal Communications Commission (FCC), Speech to Speech Relay Service (STS), a form of Telecommunications Relay Service (TRS) that enables persons with a speech disability to make telephone calls: https://www.fcc.gov/consumers/guides/speech-speech-relay-service
- Federal Communications Commission (FCC), TTY-Based Telecommunications Relay Service (TTY), a form of Telecommunications Relay Service (TRS) that enables persons who are deaf or hard of hearing to make telephone calls: https://www.fcc.gov/tty-relay

RESOURCES FOR EDUCATION AND TRAINING IN CULTURAL COMPETENCY & HEALTH EQUITY CONT.

- National Alliance on Mental Illness (NAMI) Identity and Cultural Dimensions describes how
 to promote a culture of equity and inclusion: https://www.nami.org/Your-Journey/Identity-and-Cultural-Dimensions
- U.S. Department of Health and Human Services Improving Cultural Competency for Behavioral Health Professionals, which is a free online course for the National Association for Addiction Professionals (NAADAC) Licensed Drug and Alcohol Counselors, National Board of Certified Counselors (NBCC) counselors, nurses, psychologists, psychiatrists, and social workers: https://thinkculturalhealth.hhs.gov/education/behavioral-health
- U.S. Department of Health and Human Services Office of Minority Health Physician's Practical Guide to Culturally Competent Care, which is a free online 9 credit Continuing Medical Education (CME) course. This self-directed e-learning program equips providers to better understand and treat diverse populations: www.ThinkCulturalHealth.hhs.gov
- U.S. Department of Health and Human Services National Standards for Culturally and Linguistically Appropriate Services (CLAS) in Health and Health Care https://thinkculturalhealth.hhs.gov/clas

APPENDIX B

NATIONAL CULTURALLY AND LINGUISTICALLY APPROPRIATE SERVICES STANDARDS*

The National CLAS Standards are intended to advance health equity, improve quality, and help eliminate health care disparities by establishing a blueprint for health and health care organizations to:

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

- 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.

^{*} https://thinkculturalhealth.hhs.gov/clas/standards

APPENDIX C

CARESOURCE ORGANIZATIONAL SUPPORT

As a PASSE partner providing administrative and organizational support to the CareSource PASSE, CareSource's own Cultural Competency program provides a foundation for the development and support of the PASSE's program and plan. Through its own program and its organizational supports for cultural competency and relevant data collection, CareSource provides support and information for the CareSource PASSE cultural competency program and plan.

CareSource focuses on organizational supports by:

- Ensuring that the provision of health services, proposed treatment or utilization management of services is not influenced by member race, ethnicity, national origin, religion, sex, age, mental or physical disability, sexual orientation, genetic information, or source of payment.
- Conducting ongoing organizational self-assessments of CLAS Standards.
- Ensuring the data on the member's race, ethnicity, and spoken and written language are collected in health records, integrated into CareSource systems, and periodically updated.
- Maintaining a current demographic, cultural, and epidemiological profile of the community
 as well as a needs assessment to accurately plan for and implement services that
 respond to the cultural and linguistic characteristics of the service area.

CareSource data collection is used to:

- Build an epidemiological profile of the community
- Assess needs for language services
- Monitor needs, use (including over and underutilization), quality of care, and outcome patterns
- Evaluate program effectiveness
- Provide culturally competent disease management education and member interventions for high-risk health conditions
- Ensure equitable services

APPENDIX D

NOTICE OF NON-DISCRIMINATION

CareSource PASSE complies with applicable state and federal civil rights laws and does not discriminate on the basis of age, gender, gender identity, color, race, disability, national origin, marital status, sexual preference, religious affiliation, health status, or public assistance status. CareSource PASSE does not exclude people or treat them differently because of age, gender, gender identity, color, race, disability, national origin, marital status, sexual preference, religious affiliation, health status, or public assistance status.

CareSource PASSE provides free aids and services to people with disabilities to communicate effectively with us, such as: (1) qualified sign language interpreters, and (2) written information in other formats (large print, audio, accessible electronic formats, other formats). In addition, CareSource PASSE provides free language services to people whose primary language is not English, such as: (1) qualified interpreters, and (2) information written in other languages. If you need these services, please call the Member Services number on your member ID card.

If you believe that CareSource PASSE has failed to provide the above-mentioned services to you or discriminated in another way on the basis of age, gender, gender identity, color, race, disability, national origin, marital status, sexual preference, religious affiliation, health status, or public assistance status, you may file a grievance, with:

CareSource PASSE

Attn: Civil Rights Coordinator

P.O. Box 1947, Dayton, Ohio 45401

1-844-539-1732, TTY: 711

Fax: 1-844-417-6254

CivilRightsCoordinator@CareSourcePASSE.com

You can file a grievance by mail, fax, or email. If you need help filing a grievance, the Civil Rights Coordinator is available to help you.

You may also file a civil rights complaint with the U.S. Department of Health and Human Services, Office for Civil Rights, electronically through the Office of Civil Rights Complaint Portal, available at https://ocrportal.hhs.gov/ocr/portal/lobby.jsf, or by mail or phone at:

U.S. Department of Health and Human Services 200 Independence Avenue, SW Room 509F HHH Building Washington, D.C. 20201 1-800-368-1019, 800-537-7697 (TDD)

Complaint forms are available at http://www.hhs.gov/ocr/office/file/index.html

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