

Sunshine Health



2017 Cultural Competency Plan

Applies to the following product lines:
Medicaid, Child Welfare, Long Term Care
Healthy Kids, Medicare Advantage (D-SNP & MAPD)
and Ambetter

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INTRODUCTION

Sunshine Health is a managed care organization that has multiple product lines for managed care products and specialty products; including Medicaid, Child Welfare and Long Term Care, Florida Healthy Kids (a CHIP product), Ambetter from Sunshine Health (an exchange product), Medicare Dual Special Needs Plan, and a Medicare Advantage plan. Sunshine Health is a provider of insurance coverage that enrolls multi-cultural members across the continuum of care and it is our responsibility as a health plan to ensure culturally competent care.

Sunshine Health assists in the reduction of racial and ethnic health disparities through contracting a culturally competent network, providing language support, and education. The education includes our staff, contracted providers, and vendors. To assist with the engagement of our members who do not speak English as their first language or are from a culturally diverse background, Sunshine Health hires staff who speak languages that are prevalent in our membership and understand various cultures. We also make available language interpreter services to assist members when interacting with our staff and practitioners.

Cultural competency is essential when developing methods to improve care. Our clinical and network strategic plans, goals, and objectives include promoting culturally competent care. This is supported through cultural competency training, monitoring of the unique barriers of specific populations and the development of actions to address those barriers. Those actions include collaborative efforts with our practitioners and providers, community partners and advocates who are trusted by specific racial, religious, and ethnic groups with the intent to continually improve the quality of service, appropriate use of services and the member experience.

Sunshine Health addresses cultural competency through the following:

- Fostering a culture of social awareness, values, cultural sensitivity and customer service that supports our members, including those of varied cultural background
- Recruiting and retaining a culturally diverse and competent workforce to support the needs of our members
- Developing and delivering cultural competency training curriculum/materials
- Ensuring our care management assessment and plans of care reflect a member driven approach and support the member's cultural values and sensitivities
- Ensuring our network is able to meet the cultural needs of our membership
- Providing language assistance services to all members with limited-English proficiency and/or impaired hearing at no cost to the member, practitioner, or provider

- Ensuring member materials are easily understandable and most prevalent languages are available upon request
- Developing collaborative relationships within communities to help us understand and address the health beliefs and needs of ethnic and cultural populations
- Identifying opportunities to implement culturally sensitive initiatives that address disparities in health care under the direction of senior vice president of health services
- Conducting an annual population assessment of the membership that helps identify unique needs of vulnerable groups which may require the enhancement or development of targeted initiatives to maximize improved outcomes

PURPOSE

Sunshine Health Plan is committed to the provision of a well-designed and implemented Quality Improvement Program (QI Program) that addresses the unique needs of the members enrolled in our multiple products. The programs in place include methods to address the various culture and health care systems that influence the ability to improve the health of all enrolled members.

Sunshine Health’s Cultural Competency Plan ensures that our members receive care delivered in a culturally and linguistically sensitive manner. Sunshine Health recognizes that respecting the diversity of our members has a significant and positive effect on care outcomes. Sunshine Health strives to adopt the Culturally and Linguistically Appropriate Services (CLAS) standards developed by the Department of Health and Human Services, Office of Minority Health as our guidelines for providing culturally sensitive services.

There is an annual evaluation of the Cultural Competency Plan that includes an assessment of how Sunshine Health network practitioners and providers, staff, and our operational systems effectively provide services to our members of all cultures, races, ethnic backgrounds, and religions. Specific goals will be set for targeted focus areas based on Sunshine Health’s evaluation of our membership. The annual Cultural Competency Plan evaluation will include a review and analysis of the barriers to meeting goals and the identification of interventions that will be taken over the next year to impact those barriers and improve outcomes. The evaluation will include, but not be limited to the following: population analysis, Health Effectiveness Data Information Set (HEDIS) rates, outcomes of quality studies, practitioner access and availability studies, member Consumer Assessment of Healthcare Providers and Systems (CAHPS) surveys, provider satisfaction surveys, and member complaints, appeals, and grievances. The results and action plan are reviewed by the Quality Improvement Committee (QIC). If deficiencies are identified, the senior quality director will implement work groups that involve the applicable Sunshine Health departments to develop an action plan and will monitor progress.

OBJECTIVES

Sunshine Health recognizes that our structure, staff, contracts, and approaches to delivering care are based on providing services to members of all cultures, races, ethnic backgrounds and religions in a manner that recognizes values, affirms and respects the worth of the individual members and protects and preserves the dignity of each member.

Sunshine Health Cultural Competency Plan annual goals and objectives are based on the following CLAS standards and regulatory requirements:

- Governance, leadership and workforce
- Communication and language assistance
- Engagement, continuous improvement and accountability
- Florida Agency for Healthcare Administration (AHCA) and the Center for Medicare and Medicaid (CMS) cultural competency requirements

Cultural Competency Standards and Goals

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. Sunshine Health uses the CLAS standards in the development of our Cultural Competency Plan to assist in meeting national cultural competency standards. For each standard, Sunshine Health has identified a measurement method and goal. The following table summarizes the goals and methodology to measure each standard and goal:

Sunshine Health Standards	2016 Goals	Measurement Methods	Measurement Frequency
Ensure services provided are 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.	<ul style="list-style-type: none"> • Comprehensive network based on Cultural Needs Assessment Access and Availability Analysis • Baseline year review of pregnant women <37 weeks rate of prematurity by geographic area, race, age, gender 	<ul style="list-style-type: none"> • Population Analysis (race, language, ethnicity, demographics) • Member Satisfaction (CAHPS) Survey • Healthcare Disparities Studies 	Annually

Sunshine Health Standards	2016 Goals	Measurement Methods	Measurement Frequency
<p>Providers, Sunshine Health staff, 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.</p>	<ul style="list-style-type: none"> • Comprehensive network based on Cultural Needs Assessment Access and Availability Analysis 	<ul style="list-style-type: none"> • Population Analysis (race, language, ethnicity, demographics) • Member Satisfaction (CAHPS) Survey • Cultural Needs Assessment Practitioner Access and Availability Analysis for languages spoken by the network 	<p>Annually</p>
<p>Assess the effectiveness of the Cultural Competency Plan through, but not limited to the following measures: Member Satisfaction Survey, Provider Survey and the Access and Availability Audit Process. Sunshine Health tracks and trends any issues identified in the evaluation and implements interventions to improve the provision of services.</p>	<ul style="list-style-type: none"> • Rating of Health Plan by racial/ethnic respondents that rate >8-10 favorably • Comprehensive network based on Cultural Needs Assessment Access and Availability Analysis 	<ul style="list-style-type: none"> • Member Satisfaction Survey (CAHPS) racial/ethnic composition and respondents rating of health plan • Cultural Needs Assessment Practitioner Access and Availability Analysis for languages spoken by the network 	<p>Annually</p>

A. Goal of the Cultural Competency Plan

Sunshine Health's Cultural Competency Plan's goal is to provide effective, equitable, understandable, and respectful quality care and services our members, which are responsive to the diverse racial, ethnic, religious, cultural health beliefs and practices, preferred languages, health literacy, and other communication needs of the membership.

All Sunshine Health employees receive cultural competency training as part of their new employee orientation process and existing staff receive training annually as we continuously strive to promote awareness and sensitivity to cultural competency throughout the organization. The various cultural competency trainings are described below in section B under training.

Sunshine Health develops annual goals based on prior year results. Sunshine Health annually reviews the provider network and the population analysis to ensure adequate services are provided to members of all cultures, races, ethnic backgrounds, and religions in a manner that recognizes values, affirms, and respects the worth of each enrollee and protects and preserves the dignity of each. The cultural competency plan is updated annually and a summary is posted on the provider website.

A member or a network provider may request a copy of the Cultural Competency Plan, by calling member services at 1- 866-796-0530. The Cultural Competency Plan is also posted on our provider website.

Sunshine Health monitors and completes a barrier analysis and implements applicable interventions as required. The summary of findings and actions are reported to the Quality Improvement Committee at least annually. Feedback from the Committee is considered as an ongoing method of improving the Cultural Competency Plan. The senior director of quality is responsible for the collection of data, creation of reports and monitoring the effectiveness of the interventions.

B. Governance, Leadership and Workforce

1. Policy

Sunshine Health has an organization structure that supports the advancement and sustainment of an organizational governance and leadership that promotes health equity through policy, practices and allocated resources.

Sunshine Health has clinical, network and operational policies in place that support our assessment and actions to improve health equity. Key methods used are described below:

Clinical:

Sunshine Health conducts an annual review of our membership enrolled in various products through the population analysis to assess the cultural needs and health risks of the membership.

Data utilized for assessment of the entire member population includes demographic information provided by CMS and the Florida Agency for Health Care Administration, including age and gender. Additional information that may be provided includes ethnicity, race, and/or primary language. The population assessment specifically assesses the needs of vulnerable populations including members with disabilities or serious and persistent mental illness.

Results of the population assessment are analyzed to identify gaps in care, which can be addressed through subsequent enhancements to our case management program. Potential revisions may include:

- Changes related to staffing, caseloads or program assignment
- Need to hire staff whom speak other languages or are familiar with various cultures
- Enhancements to current programs or the development of new programs
- Enhancements to or development of new training to effectively address the racial, ethnic and cultural needs of our members
- Identification of the need for new community partners

Network:

The network team annually assesses the cultural, ethnic, racial, and linguistic needs of our members through comparing data from external and internal sources to match membership needs with practitioner demographics. The director, network development uses the outcomes of the analysis to enhance the practitioner network, if necessary.

Data used to identify the membership needs includes those provided by members through member services and case management contacts and outreach efforts (i.e. new member welcome call, health risk assessment, or case management assessments), in addition to CAHPS survey results and data from members’ use of the language translation line.

The network team compares the provider data with member enrollment data to ensure we have a culturally diverse network that will meet the member’s needs. All newly credentialed practitioners and providers are invited to participate in orientation that includes comprehensive training regarding cultural competency, sensitivity, and awareness

Operations:

The member services team actively recruits staff who speak other languages and/or are familiar with various cultures to support Sunshine Health membership. As of the first quarter 2017, the member services team bi-lingual staff represent the following number of staff by product, location, and service:

Line of Business	Staff speaking English and Spanish	
	Sunrise office	Maitland office
All Reported (MMA,CW,HK)	18	35
Ambetter	17	30
Total	35	65

Total Both Sites	100
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In addition to the above Spanish speaking member services staff, there are two Ambetter staff who speak Creole and one MMA staff who speaks Hindi MM. In addition, to support our providers, Sunshine Health has 18 bi-lingual provider service representatives who support our provider services line.

Member services leadership evaluates the need for translation into other languages annually. If trends indicate the need to create documents in another language, the member services team works with the communication team to develop and obtain approval for additional written materials.

2. Diverse Workforce

Sunshine Health recruits, promotes, and supports a culturally and linguistically diverse governance, leadership and workforce that are responsive to our membership across our entire service area.

Sunshine continues to evaluate the backgrounds of our leadership and staff to ensure we have a culturally competent workforce. The diversity of members in the state of Florida is extensive. This also differs within the regions of Florida. Our staff are located in various offices throughout Florida. We do consider the staffing by region in addition to the entire state. Our vice president of human resources partners with our senior leaders to understand the needs of our membership and then assists all departments in recruiting leaders and staff who are able to meet the changing needs of our membership. This information is tracked and presented to our Board of Directors.

As of the first quarter of 2017, 73% of staff and 59% of supervisors and above represent minority populations. In addition, 85% of all of our staff are women.

Sunshine Health actively recruits bilingual staff to improve our communication with our members. The two areas who have the primary contact with members are member services and case management. In our member services department we have staff who speak the three most prevalent languages spoken by our members which are English, Spanish, and Creole. This was described in the section above. Additional languages spoken by our member services staff include Créole and Hindi. Of our total member services staff, 46% are bilingual.

Our case managers also speak multiple languages. There are 34 who speak Spanish and 15 who speak Creole. Of our total case management staff, 27% are bilingual. Sunshine Health's recruitment strategy includes the identification of bilingual candidates in these two essential departments.

3. Training

Sunshine Health has processes in place to continually evaluate and update our training and education programs for our staff and contracted providers to ensure that we reinforce the importance of approaching our members in a culturally sensitive manner. We also review our

policies at least annually and update those as needed to reflect any needed changes in order to meet this goal.

Sunshine Health utilizes a tracking system, Cornerstone, as the repository of training materials for all employees. This includes, but is not limited to member services, case management, and the appeals and grievances staff. All employees are required to complete the cultural competency training annually. The trainings are tracked and monitored through Cornerstone. The compliance department will notify the supervisor of their staff who fail to complete the training as required. The medical management training team collaborates with key departments to review and update the content annually based on the results of the population assessment, access studies, and other data. The training covers disability, diversity, and culture, which addresses dimensions of diversity, capabilities and disabilities, age, gender, socioeconomic backgrounds, sexual orientation, religion, ethnicity, and race.

All newly credentialed practitioners and providers are invited to participate in orientation that includes comprehensive training regarding cultural competency, sensitivity, and awareness. The network training team tracks the attendees of this training.

C. Communication and Language Assistance

1. Language Assistance

Sunshine Health provides language assistance, at no cost, to our members who have limited-English proficiency and/or other communication needs to facilitate their timely access to needed health care and services.

Sunshine Health offers members interpretive services for languages other than English and for members who are deaf or hearing impaired. This includes support for any service where the member may have interactions with Sunshine Health, including but not limited to member services, utilization management, disease management, case management, and grievance and appeals.

Sunshine Health provides oral translation services of information to any member who speaks any non-English language regardless of whether a member speaks a language that meets the threshold of a prevalent non-English language. Sunshine Health notifies its members of the availability of oral interpretation services and to inform them of how to access oral interpretation services. There is no charge to the member for translation services.

Sunshine Health staff will access interpreter services for those members/consumers speaking a language other than English. This interpretation service is also available for members when they access covered services. Sunshine Health member services staff or care managers can assist in arranging translation for upcoming appointments or other services. The following describes the various types of translation that is available:

Telephonic Interpreters

Sunshine Health offers language translation services through a contracted vendor. The service is available to members, our staff, including member services and case management, and to all participating network practitioners and providers.

Face-to-Face Interpreters

If the member needs face-to-face interpreters for languages other than English, Sunshine Health will:

- Place a three-way call with the interpreter service vendor.
- Provide the vendor with pertinent information regarding the Member's needs.
- Schedule a time and place for interpreter to meet with the Member.

TTY – Deaf or Hearing Impaired Support

Sunshine Health will:

- Contact the Relay Service via three-way calling.
- Provide pertinent information regarding the member's need.
- Schedule time and place for interpreter to meet with the member for their appointment (at least 2 working days prior to the needed appointment)

2. Availability of Documents in Other Languages

Sunshine Health communicates to our members that they can obtain information in other languages. Members are able to select 16 different translations on the member website for their convenience. We standardly add a tag line to member materials that informs the members on how to request materials in additional languages. Since Spanish is a prevalent language, many of our member materials are published in Spanish. That includes our member handbook, adverse determination letters sent from our utilization management department, educational materials such as promotion for preventive services, and our member incentive program. For other documents that the member may request to be translated, Sunshine Health has a contract with agencies who can translate the document into the requested language. Those documents are sent to the member and/or his/her designated authorized representative.

3. Competence of those Providing Language Assistance

Sunshine Health ensures the competence of individuals providing language assistance through contracting with a certified translation vendor. As a prior condition before contract execution, Sunshine Health evaluates the service level, vendor staff qualifications, and prior vendor performance to determine if the vendor is able to meet the needs of our membership. Sunshine Health does not promote the use of untrained individuals or family members who are minors, to provide interpretation for a member who cannot communicate in English.

D. Engagement, Continuous Improvement and Accountability

1. Marketing and Cultural Events Participation

Sunshine Health partners with local community practitioners, providers, and non-profit organization to promote health and wellness activities targeting cultural, ethnic, and underserved communities. Sunshine Health continuously develops relationship with multi stakeholders to include local federally qualified health centers, diverse cultural organizations and groups, and community health centers to ensure we connect our members to culturally sensitive events that promote health and wellness.

2. Appeals and Grievance Process for Culturally Sensitive Matters

Sunshine Health has a grievance system in place to investigate and resolve member grievances and appeals and provide access to the Medicaid Fair Hearing system. Sunshine Health assesses member complaints, grievances, and appeals related to cultural and language issues through the annual Cultural Needs and Preference Availability Analysis. The analysis assesses the number of complaints/grievances in comparison to membership to determine if opportunities exist with multiple or individual providers. The Sunshine Health member advocate team addresses each complaint and grievance through investigation and follow-ups with practitioners and/or providers on the complaint, when applicable. The member advocate team strives to resolve complaints the same day. If complaints are not resolved in one business day, the complaint becomes a grievance and follows the established processes. Sunshine Health will provide members assistance in completing forms and other procedural steps, including, but not limited to, providing interpreter services and toll-free numbers with TTY/TDD and interpreter capability.

3. Sunshine Health Organizational Awareness

Sunshine Health continuously strives to communicate the importance of cultural competency through various trainings, resources, and systems. Sunshine Health clinical teams utilize patient education materials produced by Krames, a product of Staywell, to support health literacy and promote cultural sensitivity and awareness. As an ongoing effort, Sunshine Health communicates changes to the cultural competency plan through the Quality Improvement Committee (QIC) and the provider website to promote cultural awareness.