

CULTURAL COMPETENCY PROGRAM

“Practicing Kina’ole for Hawai’i”

Effective: January 1, 2009

Revised: April 2, 2014

1. SUMMARY

As a local health plan dedicated to managing the health and well-being of our members, UnitedHealthcare Community Plan fully recognizes the importance of serving our members in a culturally appropriate manner. The term *culturally appropriate* refers to the recognition of a member’s unique ethnicity, social structure, language, values, faith and other attributes that define a person. Recognition of a member as a unique person, and not as just another plan member or patient, is critical in order for our health plan to interact and support the member in the best possible way towards achieving a common goal of improved and sustainable health and well-being.

UnitedHealthcare Community Plan’s practice of Kina’ole is defined as:

***“Doing the right thing, in the right way, at the right time,
in the right place, to the right person, for the right reason,
with the right feeling, the first time.”***

UnitedHealthcare Community Plan strives to impart upon our employees and business partners the meaning of Kina’ole as well as supporting and reinforcing the importance of the practice of Kina’ole as we interact and engage with our health plan members.

Our health plan aims to deliver the highest quality of care to every member regardless of race, ethnicity, language, sex or sexual orientation, physical and intellectual abilities, and cultural backgrounds in a manner that recognizes, affirms, and respects the worth of the individual member and protects and preserves the dignity of each member. Cultural competency is a key component of the Plan’s continuous quality improvement efforts. The Cultural Competency Program aims to ensure that:

- The Plan provides a healthcare delivery system that is compatible with the cultural framework and community environment of members and their families in Hawai’i;
- The Plan leverages the diversity of our employees and the strength of our partnership with key organizations, communities, and suppliers;
- The Plan fosters and supports a work environment that enables people to do their best work;
- All health plan staff is provided diversity/cultural competency education;

- Members with limited English proficiency have their communication needs met by providing free translation services for all members either orally or written; and
 - Our providers and business partners fully recognize and are sensitive to the cultural and linguistic differences of the UnitedHealthcare Community Plan members they serve.
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2. PROGRAM GOALS AND OBJECTIVES

The Goals for the Cultural Competency Program are:

1. Building and supporting a health plan team that is culturally competent;
2. Meeting the needs of our health plan members in a holistic and culturally competent manner;
3. Engaging member, providers, business partners, key stakeholders, and the community to continuously improve our cultural competency program.

The Objectives of the Cultural Competency Program are to:

1. Ensure that members receive from all staff effective, understandable, and respectful care and service that is provided in a manner compatible with their cultural health beliefs, practices, and preferred language;
2. Offer and provide language assistance services, including bilingual staff and interpreter services, at no cost to each member with limited English proficiency at all points of contact, in a timely manner during all hours of operation;
3. Proactively identify members that may have cultural or linguistic barriers for which alternative communication methods are needed;
4. Utilize culturally sensitive and appropriate educational materials based on the member's race, ethnicity and primary language spoken;
5. Ascertain that providers care for and recognize the culturally diverse needs of the Hawai'i population; and
6. Teach staff to value the diversity of both their co-workers inside the organization and the population we service, and to behave accordingly.

3. REVIEW AND ADAPT UNITEDHEALTHCARE COMMUNITY PLAN TRAINING MATERIALS

UnitedHealthcare Community Plan’s Hawai’i leadership team will review training materials on cultural competence to ensure that training materials cover the issues of primary importance in Hawai’i. The Plan tracks cultural needs and experiences of our members over time and where gaps are identified, our leadership team will collaborate internally and externally to update and adapt materials.

4. EDUCATION PROCESSES

A. Member

The Plan strives to ensure its members/members’ representatives are aware of what cultural competency is and how to gain access to information available. Processes implemented to ensure awareness are:

- All UnitedHealthcare member written materials are available in the following translations and other language or formats (Braille, large print, audio, TDD service, American Sign Language) upon request by the member or member’s representative:

QUEST Integration
English
Ilocano
Vietnamese
Chinese (Traditional)
Korean

- All UnitedHealthcare Community Plan member written materials will include a language block indicating that materials are available in other languages and formats as required in Title VI of the Civil Rights Act of 1964, 42 U.S.C. Section 2000d and 45 CFR Part 80.
- In order to ensure that members/members’ representatives comprehend the benefits and covered services and all other aspects of their health care program, the Plan conducts member support activities such as welcome calls and health functional assessments that can be translated in the member’s language; and on-going updates to our Participating Provider Tool on our website that lists providers’ language fluency.
- To facilitate access to interpretation/ translation services, all staff is trained to utilize the Language Line which offers over 150 different languages.

- Members/members' representatives will be instructed on how to contact our local Member Services department for translation.
- The Plan will use various formal and informal means to solicit member input on our Cultural Competency Program and ways to improve it.

B. Provider

UnitedHealthcare Community Plan strives to increase cultural awareness of providers, support providers to be sensitive to the cultural diversity of Hawai'i and educate providers on available resources. Information will be available through the following mechanisms:

- The Provider Administrative Guide (PAG) contains a summary of the Cultural Competency Program including how to access the Plan. The PAG explains the importance of cultural competency and how to access more information. Upon request, in-network providers may access the full Cultural Competency Program at no charge. Cultural competency awareness and issues are also highlighted in the PAG. For example, in some cultures, family members accompany patients during visits to health care providers. It is helpful if the providers are aware of these customs and take steps to accommodate them to the greatest extent possible.
- The UnitedHealthcare PAG and Cultural Competency Program are available on the UnitedHealthcare Community Plan website, www.uhccommunityplan.com/hi.
- Cultural competency topics are addressed in the quarterly Provider Newsletter, *Practice Matters*.
- Provider service advocates assist providers on obtaining information on cultural competency, and encourage providers to be culturally aware.
- Provider Services provided through our local Customer Service department can assist providers in using the telephonic translation service, Language Line.
- The Plan's provider services team will:
 - Complete a survey to evaluate providers for cultural competency;
 - Provide educational training; included in some of the sessions will be updates and education on cultural competency (See sample in Attachment A); and
 - Ensure cultural competence will be an agenda item at all Physician Advisory Committee meetings.
- UnitedHealthcare Community Plan's network providers must comply with, Title VI of the Civil Rights Act of 1964, 42 U.S.C. Section § 2000d, 45 CFR Part 80 and 42 CFR §§ 438(c) (2), 42 CFR 438.100(d), and 42 CFR 438.6(d) (4) and (f).
 - The Plan will monitor its network compliance with these requirements through the review of member grievance and

appeals reports, provider complaint, grievance and appeals reports, feedback from our local Member/Provider Services staff, UnitedHealthcare Community Plan internal and field staff, providers, and external partners.

- The Plan will take necessary action(s) to address, correct, fix and/or educate or re-educate those providers not meeting the requirements. Action(s) may include a corrective action plan (CAP) up to suspension and/or termination of a provider from the network. The Plan will follow the process outlined in its Credentialing and Recredentialing policy to ensure providers are afforded their appeals rights. In the event a provider is suspended or terminated from the network, the Plan will notify all affected members via the process outlined in the Provider Termination Notice to Members policy to ensure service continuity.

C. Employee/Staff

- All new staff (including any business partners) serving UnitedHealthcare Community Plan QUEST Integration members and providers will receive cultural competency and diversity training as part of new employee orientation. Major elements of the training curriculum include:
 - The rationale and need for providing culturally and linguistically competent services; and
 - Methods individuals from different cultures typically use to seek health care and effective approaches to communicating health information to a diverse population.
- Staff (including any business partners) that have face to face interaction with members will be required to complete a comprehensive cultural competency training that emphasizes the importance of acknowledging differences in people and how to address the needs of their members in a holistic approach taking into consideration variables such as:
 - Cultural background
 - Ethnic background
 - Religious beliefs
 - Physical and intellectual abilities
 - Economic situation
 - Living environment
 - Family and social situation
- Annually, all staff will be required to complete an annual training on cultural competency skill development and harassment issues.
 - The training is completed utilizing a variety of methods including traditional classroom presentations, on-line training, and informal brown bag lunch discussions.

- UnitedHealthcare Community Plan obtains staff feedback after cultural competency trainings are completed.

D. Capturing Information on Provider Language Skills

UnitedHealthcare Community Plan's online provider directory "Find a Doc" search tool and hard copy (PDF) available on the Plan's website www.uhccommunityplan.com/hi identifies providers with the ability to communicate with people whose primary language is not English. All members are provided with a hard copy of the provider directory at the time of enrollment with the Plan and at least annually.

Attachment C shows a template for information identifying the languages spoken by our providers and how many providers are available for those languages.

5. LANGUAGE DOCUMENTATION

A. Alternate Language Requests to Member Services and the Plan

To ensure language preference is observed during phone communications, all new QUEST Integration members will receive a new member assessment conducted by a health plan representative. The questionnaire asks if the member prefers a primary language other than English for verbal communications with the health plan. If a different preferred language is requested, the information is documented in the Plan's information system (which includes a date stamp). The Plan will complete and submit a Demographic Change Form to DHS. If English is the member's primary language, then the representative will document the decline of a translator in the Plan's information system(s).

For each member requesting written materials in a non-English language, the Member Services Representative shall record the member's:

- First and last name
- ID number
- Date of request
- Date the documents were mailed or provided
- Language requested

On an ongoing basis, Member Services Representatives are trained on detecting and offering of a translator if a caller is having difficulty due to a language barrier, as well as ensuring no indication is made to the member regarding providing their own interpreter.

B. Information Transfer

UnitedHealthcare Community Plan receives the electronic eligibility file from the State of Hawaii (DHS), which includes the member's language preference. The

file is loaded into UnitedHealthcare Community Plan's information system(s) which is available for reporting and internal use (such as by Member Services). Mailing lists for member materials are pulled from the Plan's information systems. If the member is flagged for "all written materials" in one of the requisite alternate languages, the member material(s) will be sent in that alternate language.

C. Member Requisite Language Requests

Members can request that all member materials be sent in one of the requisite other languages as stated in section 4A. Such requests can be received from a variety of sources (e.g. from the member, member's representative, member's provider, written or fax communication, email).

If the member, member's representative, Service Coordinator, or a provider asks that a specific member material be sent to a member in one of the requisite alternate languages, the Plan will do so (a "one-off request" vs. "all materials" in item 5B above).

6. FEEDBACK MECHANISMS

We will track the needs and experiences of our members over time, including but not limited to the following mechanisms:

- **Translation/Interpretation Services Report**, includes the following information on Language Line activities during the previous quarter:
 - name and member identification number for each member to whom translation/interpretation service was provided;
 - date of the request;
 - date provided;
 - type of service including the language requested; and
 - identification of the translator/interpreter.

The Plan submits quarterly reports to the State of Hawai'i (DHS).

- **Requests for Documents in Alternate Languages Report**, includes the following information on Member Services activities during the previous quarter:
 - name and member identification number for each member requesting documents in an alternative language;
 - language requested;
 - data of the request; and
 - date the documents were mailed or provided.

The Plan submits quarterly reports to the State of Hawai'i (DHS).

- **CAHPS® Consumer Survey and/or member and provider satisfaction surveys** conducted annually which include a cultural competency component.
- **Monitoring member grievance and appeals, and provider complaints, grievances and appeals** relating to cultural competency issues.

7. EVALUATION OF CULTURAL COMPETENCY PLAN

Each year, the UnitedHealthcare Community Plan leadership team will:

- Review and update, as necessary, the Plan's Cultural Competency Program to ensure it continues to meet the needs of the health plan's members;
- Assess progress in meeting the cultural competency goals for the prior year;
- Review and update, as necessary, the cultural competency goals for the coming year.

Attachment A Sample Provider Training Agenda

Learning Objectives:

- Overview of UnitedHealthcare Community Plan
- UnitedHealthcare Community Plan Contact Information
- QUEST Integration Program
- Provider Contracting
- Claims processing (how UHC process their specific claims for payment)
- Claims submission process and electronic billing and payment options available for providers
- Referral, Notification, and Prior Authorization (PA) Processes
- Role of the PCP
- PCP Assignment
- Role of the Service Coordinators
- Service coordination activities and how to access these services including information on how to access the member's assigned Service Coordinator
- Member's rights and responsibilities, including the right to file a grievance or appeal and how a provider can assist members
- Member grievance and appeals process
- Circumstances and situations under which the provider may bill a member for services or assess charges or fees
- Medical records documentation requirements including:
 - requirements that the documentation must be tied to the claims submission or encounter data
 - need to discuss and document discussion about Advance Directives
- Provider grievance, complaints and appeals process
- Cultural Competency
- Fraud, Waste and Abuse
- Program Benefits that will include medical, behavioral health, transportation, long term care, ancillary, pharmacy and other covered services
- How to access the Plan's provider websites and online provider resources (e.g. Provider Administrative Guide, forms, newsletters, etc.)
- Member eligibility/enrollment
- Quality of Care
- The Plan's roles and responsibilities
- Provider responsibilities that includes adherence to:
 - Americans with Disabilities Act (ADA)
 - How to access interpreter, auxiliary aids, American Sign Language services for their patients
 - Access and Availability Standards
 - EPSDT requirements and forms
 - Credentialing and Recredentialing requirements (covers contractual requirements)
 - Reporting requirements (encounter data submission)
 - Regulatory requirements including privacy, confidentiality and record retention

Methods the Plan will use to update providers on program and health plan changes (e.g. monthly/quarterly provider newsletters or bulletins, provider conferences, face-to-face visits, and other forms of communication)



Provider Education Learning Objectives



- Overview of UnitedHealthcare Community Plan
- UnitedHealthcare Community Plan Contact Information
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 - need to discuss and document discussion about Advance Directive
- Provider grievance, complaints and appeals process
- **Cultural Competency**

1

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Provider Education Learning Objectives



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2

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**ATTACHMENT B
Cultural Competency Training Program Presentation**

Attachment B is in a separate file.

**ATTACHMENT C
Languages Spoken by UnitedHealthcare Participating Providers**

UnitedHealthcare Community Plan actively develops and recruits providers who speak languages prevalent in our community. The following list of providers is updated periodically and at least on a quarterly basis.

Language	# of Providers	Language	# of Providers	Language	# of Providers
Spanish	307	Thai	14	Danish	4
Japanese	234	Arabic	13	Indonesian	4
Tagalog	198	Gujarati	12	Ukrainian	4
Ilocano	182	Urdu	12	Burmese	3
French	117	Samoan	11	Czech	3
Chinese	98	Marshallese	10	Dagbani	3
Mandarin	82	Portuguese	10	Pangasinan	3
Cantonese	75	Punjabi	8	Tamil	3
Korean	61	Afrikaans	7	Turkish	3
Filipino	52	Farsi	6	Dutch	2
Vietnamese	37	Micronesian	6	Fukienese	2
Italian	34	Persian	6	Hebrew	2
Hindi	33	Swedish	6	Lao	2
German	30	Hawaiian	4	Malay	2
Greek	23	Hungarian	5	Telugu	2
Taiwanese	23	Lithuanian	5	Cambodian	1
Russian	17	Polish	5	Serbo-Croatian	1
Visayan	17	Croatian	4	Tokelau	1