



PENINSULA RSN

NETWORK MANAGEMENT POLICIES AND PROCEDURES

Policy Name: CULTURALLY COMPETENT SERVICE
STRUCTURE

Policy Number: 3.03

Reference: WAC 388-865-0450 and 1996 Waiver

Effective Date: 9/2005

Revision Date(s): 9/2009

Approved by: PRSN Executive Board

CROSS REFERENCES

- Policy: Corrective Action Plan

PURPOSE

It is the policy of the Peninsula Regional Support Network (PRSN) to establish, and to require network providers and subcontractors to establish, policies, procedures and mechanisms maximizing access to and use of mental health services, including care which evidences age and cultural competence, assures reception of appropriate levels of care, and in which treatment plan responsibility and information availability issues meet criteria as specified in Washington Administrative Code (WAC) and PRSN/ DSHS contracts.

DEFINITIONS

Age and Cultural Competence means:

- Recognition of the unique developmental and socio-cultural needs and customs of human beings at differing ages, specifically those of children and older adults;
- The ability to serve individuals in a manner which is responsive to their unique developmental needs;
- Recognition of the unique beliefs, customs and institutions which arise out of each individual's self-identified social/cultural and/or ethnic group; and
- The ability to serve individuals in a manner which is responsive to their unique cultural background.

PROCEDURE

The PRSN will, in compliance with Revised Code of Washington (RCW), WAC and contract, promote and evidence age and cultural competence throughout the system by:

Representation:

Governance System: Conducting recruitment for membership on the Advisory Board so as to enhance representation of regional demographics, including persons representing:

- Consumers, past and present
 - Tribal membership or other significant ethnic groups
 - Concerns of youth and children
 - Concerns of older adults
- a. PRSN staff conducts a demographic profile of Advisory Board members no less than annually to determine if membership is representative of the region as defined above, and advises the Board of recruitment needs, if any.
 - b. PRSN staff mail recruitment letters to organizations serving individuals from diverse cultural groups, particularly those groups under-represented, when a vacancy on the board occurs.
 - c. PRSN staff, QRT and Advisory Board members maintain ongoing discussions with key informants who are knowledgeable and involved with diverse cultural communities within Clallam, Jefferson and Kitsap Counties in order to inform and invite their membership on the Board.
 - d. The PRSN staff apprises Executive Board members and management staff of requirements relative to age and culturally competent representation in order to support compliance with laws, regulations, and contractual obligations.
 - e. Advisory Board orientation materials include sections addressing the PRSN goals for achieving region-wide cultural competence.
 - f. The Advisory Board advises the Board and PRSN regarding potential benefits or barriers resulting from current policies and procedures; and who address the reduction and elimination of culturally based barriers to service; and who serve in conjunction with the oversight committee(s) for children, older persons, and ethnic minorities which meets quarterly and which includes parents of children/adolescents receiving services, early intervention providers, health providers, juvenile court, child welfare, tribal and substance abuse treatment providers who address, as well, EPSDT requirements.
 - g. PRSN management staff attend and represent the PRSN at regional meetings, conferences, assemblies or trainings which examine, promote or represent

cross-cultural awareness, and schedules Advisory Board or other appropriate meetings at churches, Tribal Centers and other community-based locations which may be comfortable to and promote attendance by a diverse population.

Administration: Ensuring that PRSN staff:

- a. Review demographic profiles and provide demographic information relative to the region and catchment areas in order to promote and facilitate broad representation throughout the system.
- b. Recruit PRSN staff in a manner which assures removal of barriers to equal opportunity and promotes diversity.
- c. Develop a roster of Specialists who may be accessed by network providers for consultation in the event an appropriate Specialist is not available within the provider organization. The providers may have an additional list of Specialists, who may have a formal and contractual, or informal arrangement with consultants.
- d. The PRSN management staff develops Tribal Agreements and regularly schedules meetings with Tribal authorities for the discussion of issues of mutual interest or concern.

Grievance, Quality Review Team, Ombuds: Ensuring that:

- a. The PRSN and provider grievance policies and procedures are reviewed and policies or procedures which may represent a barrier, or do not enhance age and culturally competent representation, are revised.
- b. The Quality Review Team recruitment policies and practices are in alignment with those of the Advisory Board and solicits persons who evidence an understanding of or appreciation for age and cultural competence issues for membership.
- c. The policies and procedures of the Ombuds, and its management, are reviewed, and policies or procedures which may represent a barrier, or do not enhance age and culturally competent representation are revised. Recruitment for Ombuds solicits persons who evidence an understanding of or appreciation for age and cultural competence issues.
- d. The Ombuds program policies and procedures are culturally competent.
- e. The Ombuds program policies and procedures encourage the involvement by consultation with or supervision from, specialists, and certified interpreters, when addressing consumer concerns of special populations.

- f. All steps necessary to pursue complaint and grievance procedures at the PRSN, provider, and all other levels are translated into the languages most used in the region.

Provider Network and Subcontractors: Requiring that:

- a. Contracted network providers and subcontractors evidence policies and procedures which include provisions to ensure staff development and staffing that is culturally competent and promotes availability of age and culturally competent staff.
- b. Contracted network providers and subcontractors assure that equal access to available services exists for people who are not English proficient or who are ethnic minorities by making marketing materials available for these services in alternative languages.

Clinical Care: Requiring that contracted network providers ensure availability of, or access to, age and culturally competent staff, or consultants to staff, who are able to provide:

- a. Assistance to Providers in developing appropriate access avenues which promote service availability across age, ethnic groups within the catchment area, local cultures, and among under served populations.
- b. Age and culturally competent clinical supervision.
- c. Age and culturally competent service delivery.
- d. Age and culturally competent specialist availability.
- e. Age and culturally competent representation in the various review and monitoring aspects of PRSN and provider quality assurance/improvement systems.

Training

Administration:

- a. The PRSN contracting for, and making available to staff of the RSN, network providers, subcontractors, the Advisory Board and QRT, the Ombuds, and other constituents of the region as it deems appropriate, training which promotes age and cultural competency including respect for and awareness of:
 - Non-ethnic based cultures (e.g. gang, prison related, regional, religious, life style or occupation related, etc.), as well as cultures of ethnicity
 - Valuing diversity
 - The dynamics of difference

- Acculturation vs. assimilation
- Cross cultural and/or cultural norms in assessment, differential diagnosis, service planning and intervention
- Incorporation of the individual's age or culture related supports and beliefs into the treatment process
- Incorporation of non-traditional interventions into the treatment process
- Developmental issues; and socio economic issues in order to provide the most consumer-useful, effective and efficient services

b. The PRSN ensuring that it:

- Develops an on-going/updated roster of trainings within the region which are delivered by persons with expertise in age and cultural competence, and which address 1) the concepts of age and cultural competence in general, and 2) specific competencies relative to children and older adults, ethnic groups within the region, other cultural groups within the region
- Provide the training roster to personnel at all levels of the mental health service delivery system within the region
- Annually attend a training that addresses age or cultural competence in mental health service systems

Governance, Grievance-QRT-Ombuds, Provider, and Subcontractor Systems

The PRSN ensuring that it:

- a. Provide training rosters to, and encourage attendance by, members of the Advisory Board at age and cultural competence training.
- b. Provide training rosters to, and encourage attendance by, members of the QRT and the Ombuds at age and cultural competence training.
- c. Require that network providers ensure that all staff attend training in age and cultural competence concepts and that clinical staff attend training to increase their competence in specific areas of age or culture.
- d. Promote and facilitate network provider ability to assist staff in attending training, which will result in their acquiring specialist status in areas of age, cultural or other specialty competence.

Written Entrance Criteria- Outpatient and Inpatient Services

- a. The PRSN, with its providers, develop and implement age and culturally competent written criteria for outpatient and inpatient eligibility, admissions, and continuing stay authorization criteria and discharge protocols for PRSN funded services.

By assuring that documents for information gathering, screening, intake, assessment, and individual plans of care, developed by the PRSN and/or providers/ subcontractors, promote age and cultural competence by including opportunities for service recipients to identify their age, their ethnicity according to personal perception, their culture, and issues relating to these factors.

The individualized information is included in authorization requests for outpatient and inpatient services and referrals to hospitals or other services which may be treating the service recipient.

- b. The PRSN requires, and ensures through review and audit, that network providers implement PRSN policies and procedures regarding cultural competency through:
 1. Early identification of persons seeking services who are an ethnic minority or specialty population by:
 - Providing an opportunity for self identification of one's ethnic or cultural group or groups within the beginning interactions of the initial contact between the PRSN and/or provider and the person seeking service, while maintaining their right to decline to provide this information.
 - Organizing access documents so that the consumer can self-identify his/her ethnic or cultural group(s), and be allowed to identify more than one ethnic group.
 - Organizing all screening, intake and other access documents to capture date of birth and age, and any existing disability information.
 2. Upon identification that the service applicant or consumer is under eighteen years of age or over sixty years of age, is disabled, or has identified him or herself as a member of an ethnic minority, the PRSN requires that the Provider staff:
 - Refers and/or arranges for further contact, within the activity being performed, to be conducted by an available appropriate specialist; *or*, if none is available;
 - Arranges for consultation, in person or by telephone, by an appropriate specialist at the earliest reasonable opportunity within contract requirements; *or*
 - Performs the activity under the supervision of an appropriate specialist; and
 - Documents the date, time and person contacted to provide consultation or supervision.
 - Explicitly asks the service applicant about preferences which they may have relative to the plan of care and documentation in the treatment plan.

3. The network provider staff conducting interviews determines English language proficiency, documents the need for interpreter services and arranges for interpreter services, if necessary.
 4. All written materials generally available to service recipients are made available and TTY and other electronic devices are available to assure communication.
 5. Treatment planning and process include interventions which are congruent with the client's cultural background and are documented as such.
 6. Care coordination of clients receiving in-patient services includes review of the age and cultural competence of the care being received.
- c. The PRSN requires that provider staff include an assessment of relevant cultural issues which may include levels of acculturation vs. assimilation when planning for services for individuals who are ethnic minorities, and the explicit incorporation and documentation of assessment outcomes into planning and services.
 - d. Consultation by Specialists is always documented and accessible through Profiler. Consultation information is incorporated into the Treatment Plan.
 - e. Differential diagnosis, assessment, and service planning by provider staff explicitly address the individual client's cultural norms, which are documented.
 - f. The PRSN requires and network provider staff incorporate, and document the incorporation of, the individual consumer supports and beliefs into the treatment process, indicating those that are unique to the individuals culture, if known.
 - g. The PRSN requires and network provider staff incorporate and document the incorporation of traditional interventions that the client has identified as having efficacy for them, into the treatment process.
 - h. The PRSN Quality Management policies and procedures require activities specifically designed to identify culturally based barriers within the mental health system or services and the recommendation of solutions to resolve identified barriers.
9. The PRSN policies and procedures require the contracted managed care entity delegated PRSN authorization of services/utilization management address issues of cultural competence.

Language Availability

The PRSN, and network provider and subcontractors, ensure:

1. Certified interpretation is provided for limited English proficient clients and their families
 2. Outpatient client rights are posted in lobby areas within each network provider agency in the seven DSHS required languages and other predominant languages in the region.
 3. Clients who are unable to read written material have access to the information in their own language, by
 - Utilizing certified interpreters on- staff, if available
 - Contracting for certified interpretation services, as necessary
 - Compiling and making available to all service providers, a list of acceptable interpreters and how to access them
 - Ensuring communication capacity including TTY and other electronic devices
- b. The PRSN ensures that all PRSN informational material and postings which represent services (such as access to services provided in the region, consumer rights, complaint/grievance protocol, or other crucial program information) are published in the DSHS required seven languages and other predominant languages in the region/network provider catchment area. These documents are translated by certified interpreters.
- The PRSN Member Handbook, Outpatient Client Rights and Authorization letter are all posted on the PRSN website in the PRSN Manual.

Specialists (See also PRSN Specialists List)

The PRSN staff ensures that network providers and subcontractors have access to and use Specialists as defined in RCWs by:

- Providing Providers with the definitions of and requirements for Specialists
- Providing Providers with definitions of special populations
- Assisting Providers in having access to Specialists via distribution of annual in-network and out-of-network Tribal Specialists lists.
- Monitoring Providers to ensure compliance

MONITORING

This policy is a mandate by contract and statute.

1. This Policy will be monitored through use of PRSN:
 - Annual PRSN Provider and Subcontractor Administrative Review
 - Monthly Provider Clinical Chart Review

- Exhibit N Report and Grievance Tracking
 - Biennial Provider Quality Review Team on-site review
 - Quarterly Provider Performance Reports
 - Biennial Provider Ancillary Surveys
 - Quality Management Plan activities, such as review targeted issues for trends and recommendations
 - Review of previous Provider Corrective Action Plans related to Age and Cultural Competence policy, including provider profiles related to performance on targeted indicators
2. If a provider performs below expected standards during any of the reviews listed above a Corrective Action will be required for PRSN approval. Reference PRSN Corrective Action Plan Policy.