



Optum Tooele County

Cultural Responsiveness Plan

Effective November 2020

I. Introduction

Optum recognizes that a person's cultural norms, values and beliefs shape how they approach and utilize behavioral health care services. Numerous cultural variables including, but not limited to, ethnicity, race, sexual orientation, gender identity, age, socioeconomic status, primary language, English proficiency, spirituality and religion, country of origin, literacy level, employment status, geographic location, cognitive and physical ability level, immigration status and criminal justice involvement influence the way in which a person seeks and utilizes behavioral health services and the manner in which a person approaches and manages recovery.

Group differences are vast and include variations in values, behavior styles and health risk indicators. Similarly, members differ widely in how they participate and respond to mainstream American institutional settings and service delivery models. Our employees and providers must not only recognize the cultural groups and shared heritage relevant to Tooele County, but also understand that culture can be highly individualized. This consists of understanding the unique interplay of many factors in a member and family's life that contribute to strengths, resources, values, perceptions and interests that impact the understanding of needs, goals, resources and interventions for that individual. Such factors may include mixed heritage, generational influences, family experiences, religion and faith traditions, refugee and immigrant experiences, lifestyle, economics, and urban/frontier/rural orientation.

Optum recognizes that cultural responsiveness plays a vital part in realizing our goal of supporting member recovery and resiliency in ways that are meaningful for individuals in their communities, and appropriate and relevant to their unique cultural experiences. Our role as an organization is to give our employees and providers the key skills they need to support each member in their individualized recovery and to engage and support members in a way that is culturally and linguistically appropriate. Accordingly, we ensure that all aspects of our hiring, training, services, and quality improvement emphasize cultural responsiveness.

This Cultural Responsiveness Plan was developed to document the methods we use to promote culturally responsive care and to track our level of success in achieving goals related to cultural responsiveness.

II. Authority, Structure and Responsibility for the Integration and Coordination of the Cultural Responsiveness Plan

The Optum Tooele Executive Director has the authority and responsibility to integrate cultural responsiveness throughout Optum's operations. The Executive Director has delegated the development and oversight of the plan to the Tooele County Quality Assurance and Performance Improvement Committee (Tooele County QAPI Committee), chaired by the Optum Tooele Medical Director and the Compliance and Quality Assurance Director.

III. Goals & Objectives

The following seven goals document the methods we use to promote culturally responsive care. The corresponding objectives assist us in developing, monitoring and evaluating our level of success in achieving goals related to cultural responsiveness. The methods used to achieve the goals of the Cultural Responsiveness Plan shall serve as the *Methods of Administration Plan*, a means of assuring that Optum's programs, activities, services and benefits are equally available to all persons without regard to race, color, national origin, disability, age, religion, gender identity, sexual orientation, or socio-economic status.

Goal 1: Identify policies and procedures that ensure cultural responsiveness is integrated and reflected throughout Optum Tooele County and the provider network.

- Monitor existing customer service, quality management, utilization management and provider relation policies and procedures for compliance with CLAS (Culturally and Linguistically Appropriate Services) requirements and recommendations.
- The Optum Tooele QAPI Committee will review the Cultural Responsiveness Plan annually.

Goal 2: Ensure Optum actively recruits, retains and promotes a diverse staff at all levels of the organization.

- Ensure open communication and collaboration by encouraging the sharing of thoughts and ideas clearly and effectively with colleagues, leadership, and counterparts, as well as with members, family members, local and state agencies, providers, and community programs.
- Provide ongoing training, educational prospects, and promotion through tuition reimbursement plans, internship opportunities, professional development and a comprehensive training program.
- Provide a competitive hiring package from an Equal Opportunity Employer that includes above-average salaries and a strong benefit package that includes physical and behavioral health insurance, Employee Assistance Plan (EAP) services, short- and long-term disability and life insurance, paid vacation and sick leave, and an attractive employee stock purchase program.
- Advertise open positions through cultural organizations, culture-specific media outlets and cultural professional organizations.

Goal 3: Ensure network providers across all disciplines have ongoing education, training and clinical consultation in culturally and linguistically appropriate service delivery and dispute resolution.

- Providers will receive ongoing education, training and clinical consultation in culturally and linguistically (including deaf and hard of hearing) appropriate

service delivery and dispute resolution. Training will be provided through a variety of methods, including face-to-face and webinar. At a minimum, training objectives will include the ability to:

- 1) Define cultural responsiveness and its importance to the behavioral health clinician providing care, services or treatment to a culturally diverse population
- 2) Describe attributes of various cultures in Tooele County
- 3) Describe some unique medical and behavioral health issues for these respective cultures
- 4) Provide the framework necessary for more in-depth understanding that is required to establish a culturally competent practice and/or organization
- 5) Emphasize the use of **Culturally and Linguistically Appropriate Services in Healthcare (CLAS)** standards for cultural responsiveness

Goal 4: Ensure Optum staff across all disciplines have ongoing education, training and clinical consultation in culturally and linguistically appropriate service delivery and dispute resolution.

- Training for staff will include initial and ongoing presentations on cultural responsiveness. Presentations will be provided in the following formats: LearnSource, face-to-face and webinar.
- On-going Departmental and Supervisory training will be provided for clinical staff. Trainings will be provided in the following formats: LearnSource, face-to-face and webinar.

Goal 5: Implement quality improvement activities to monitor cultural responsiveness within the provider network, customer satisfaction, and identify service gaps in the system.

- Provide a quantitative and qualitative analysis of the population on which member focused quality improvement efforts are based, including, but not limited to age, gender identity, sexual orientation, geographic location, languages spoken, presence of disability (i.e., intellectual, physical and/or visual/hearing).
- Assess the diversity of the provider network and Optum in representing and addressing the linguistic, cultural and ethnic demographic needs and preferences of members.
- Provide a summary analysis of the populations' clinical and risk characteristics for targeting current and future quality improvement efforts and to identify appropriate supportive education and prevention activities.
- Assist providers to integrate cultural and linguistically competent-related measures into their internal audits, performance improvement programs, member satisfaction assessments, and outcomes-based evaluations.

Goal 6: Identify diversity and inclusion best practices and promote these strategies and supports throughout Optum and the provider network.

- The Tooele QAPI Committee will meet at least quarterly to identify best practices in serving the identified communities. These groups will generate policy, outreach and training recommendations.
- Cultural Responsiveness and diversity awareness will be integrated into the Optum Tooele County website. The website will provide information for members, families, providers and community stakeholders.

Goal 7: Provide language assistance services that are relevant to the needs of all people in Tooele County including those who (a) speak a language other than English, (b) are deaf or having hearing impairments, (c) are blind or have visual impairments, and/or (d) have limited reading ability.

- Provide language assistance services to its members 24 hours a day, 365 days per year.
- Actively recruit and hire bilingual staff to assist members who have limited English proficiency.
- Employ a Language Line which provides live and immediate translation capabilities for 170 languages using interpreters trained in medical terminology.
- Offer Telephone Device for the Deaf (TDD) and Telecommunications Typewriter (TTY) services.
- Assure interpreter proficiency via a structured process for the initial and ongoing assessment of staff hired to provide language assistance to members.
- Provide all written materials and website information in English and Spanish and any other language spoken by 5% or greater of the population.
- Ensure all written member materials are worded at a 6th grade reading level.
- Make available all written materials in alternative formats to persons with special needs, including large print and audio.
- Ensure all required documentation includes information on free language assistance services as per Section 1557 of the Affordable Care Act.

IV. Population Analysis

Additional objectives are identified and actions are implemented based on data review. At the beginning of each contract and annually thereafter, Optum performs or reviews a population analysis. As part of this analysis, we analyze the ethnic and cultural makeup of the members and geographic areas that we serve. The purpose of the population analysis is to:

1. Provide a quantitative and qualitative analysis of the population on which member focused quality improvement efforts are based, including recognition of groups within groups (such as multiple and diverse Native American or Hispanic groups, age, religion, sexual orientation, mixed heritage, rural/urban, education, and other individualized factors).
2. Assess the diversity of the provider network and Optum in representing and meeting the linguistic, cultural / ethnic and demographic needs and preferences of members.
3. Provide a summary / analysis of the populations' clinical and risk characteristics for targeting of current and future quality improvement efforts and determine the education, prevention and promotion activities we need to undertake.

The information in this report is used for the development of clinical and prevention programs, quality improvement activities, network expansion efforts, and to determine prevalent non-English languages. It will further provide critical penetration data to focus any service gap analyses. This will inform our efforts to be sensitive to the needs of diverse cultural influences.

In assessing member and geographic characteristics, Optum considers factors such as gender identity, age, ethnic background, cultural identity and practices, clinical needs, risk characteristics and linguistic preferences. Sources of data identifying this information include:

- Claims Data
- US Census Bureau Data for Utah and Salt Lake County
- Member Eligibility and Assessment Data
- Provider Management Database and GeoAccess Reports
- Complaints & Grievances
- Member Satisfaction Survey Results
- The 834 Enrollment transaction report to identify prevalent non-English languages in the previous 6 months
- Any identified issues from the County, State or UDOH Medicaid

Optum relies upon interactions and interviews with local experts and groups to assist in interpreting the data. The Tooele QAPI Committee is essential in gathering the necessary input into the population analysis.

V. Tooele QAPI Committee

- a. Role/Purpose: The Tooele QAPI Committee reviews and recommends standards of practice and outcomes related to cultural competence, and reviews access to service data, monitoring data, and complaint and grievance data to identify trends and make recommendation for quality improvement initiatives as they relate to culturally competent services.

- b. Structure relation to the Organization: Oversight of the Optum Tooele QAPI Program is provided through a committee structure that is accountable to Optum Executive Leadership.
- c. Chair: Optum Tooele County Medical Director and the Compliance and Quality Assurance Director or Designee
- d. Functions/Key Responsibilities related to Cultural Responsiveness:
 - i. Ensure that staffing at all levels is representative of the community at large.
 - ii. Ensure cultural factors are integrated into the clinical assessment
 - iii. Ensure that treatment plans and interventions are culturally appropriate
 - iv. Sponsor Cultural Responsiveness Trainings as needed
- e. Frequency of Meetings – Quarterly or more frequently when needed
- f. Membership:
 - In addition to the chairpersons, the Optum Tooele QAPI Committee is comprised of:
 - i. Optum Tooele County Network and Contracts Director or designee
 - ii. Representative(s) from member organizations
 - iii. Representative(s) from a family organization
 - iv. Representative(s) from providers that serve specialty populations,
 - v. Providers from allied service systems
 - vi. Optum Tooele County Clinical Director or designee
 - vii. Optum Tooele County IT/Reporting staff
 - viii. Optum Tooele County Recovery & Resiliency staff
 - ix. Other County division representatives
 - x. Representatives from community based ethnic and minority organizations

VI. Non-Discrimination Coordinator

Optum Tooele County has a designated non-discrimination coordinator. Their purpose is to ensure that Optum and its providers comply with federal laws and regulations regarding non-discrimination and assure that their programs, activities, services and benefits are equally available to all persons.