



# Cultural Competency Plan

The Cultural Competency Plan is created by the Cultural Competency Committee (CC), a delegated authority by the Texas Children’s Health Plan (TCHP) Quality Committee (QC), to adhere to the requirements in the Uniformed Managed Care Contract with the State of Texas. Texas Children’s Health Plan is required to have a written cultural competency plan that details the implementation of the national Culturally and Linguistically Appropriate Services (CLAS) standards. Scope of work includes the following:

CLAS Standard	Component	Implementation Activities
<b>Principal Standard</b>	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.	<ul style="list-style-type: none"> <li>• Texas Children's Health Plan (TCHP) maintains a Cultural Competency Plan that demonstrates its commitment to providing Culturally and Linguistically Appropriate Services (CLAS). The Cultural Competency Plan is available to all employees and shared with the organization's Compliance and Quality Committees. The plan is also available to our provider community on <a href="http://www.thecheckup.org">www.thecheckup.org</a>.</li> <li>• Through the implementation of and adherence to our Cultural Competency Plan, TCHP creates a welcoming environment that fosters appreciation for employee diversity and demonstrates respect for the culturally and linguistically diverse populations we serve.</li> </ul>
<b>Governance, Leadership, and Workforce</b>	2. Advance and sustain organizational governance and leadership that promotes CLAS and health equity through policy, practices, and allocated resources.	<ul style="list-style-type: none"> <li>• TCHP's commitment to culturally competent care is reflected in the organization's mission of creating a healthier future for children and women throughout our global community.</li> <li>• TCHP's governance structure includes a Cultural Competency Committee, that reports up to TCHP's Quality Committee, whereby the Cultural Competency Plan and associated activities, including policies and procedures, are reviewed at least annually. The plan is also reviewed by TCHP's Compliance Department to ensure we are meeting regulatory requirements.</li> </ul>
	3. Recruit, promote, and support a culturally and linguistically diverse governance, leadership, and workforce that are responsive to the population in the service area.	<ul style="list-style-type: none"> <li>• TCHP recruits, retains, and promotes at all levels of the organization a diverse leadership that reflects the demographic characteristics of the population in its service areas.</li> <li>• TCHP partners with Texas Children's Human Resources department to evaluate language and communication proficiency of staff to determine fluency and appropriateness for serving as interpreters.</li> <li>• TCHP offers an online Spanish course for member-facing employees to assist with learning and developing competence with speaking the Spanish language.</li> <li>• TCHP provides multiple monthly opportunities for employees to volunteer in the community and to learn about community members and other cultures and work with community based organizations to create such interactions.</li> </ul>
	4. Educate and train governance, leadership, and workforce in culturally and linguistically appropriate policies and practices on an ongoing basis.	<ul style="list-style-type: none"> <li>• TCHP employees are introduced to the Cultural Competency Plan and Annual Training in New Employee Orientation.</li> <li>• All TCHP employees are required to complete the online Cultural Competency training module each year. The expectation for completing the training is embedded as a performance management goal into the employee's annual evaluation.</li> </ul>

CLAS Standard	Component	Implementation Activities
<b>Communication and Language Assistance</b>	5. 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.	<ul style="list-style-type: none"> <li>• TCHP offers language assistance at no cost to individuals who have limited English proficiency. Interpretation is provided in multiple languages and the services can be provided over the phone or in person, if needed.</li> <li>• Employees are trained on the use of language assistance services, including the use of 2-1-1 for communication with individuals who may be hearing impaired.</li> <li>• All member materials are written at a 6th grade reading level.</li> <li>• All member materials are available in Spanish.</li> </ul>
	6. Inform all individuals of the availability of language assistance services clearly and in their preferred language, verbally and in writing.	<ul style="list-style-type: none"> <li>• Members receive written communication through multiple channels about the language services available to them, including providing the ACA 1557 document with mailed communications. All member materials are written at a 6th grade reading level and include information about how to request materials in different languages.</li> <li>• Members are able to access Spanish via the interactive voice response (IVR) system when calling into TCHP.</li> <li>• Call Center Representatives (CCRs) inform and assist Members with limited English proficiency to obtain language assistance in their preferred language at no cost.</li> </ul>
	7. Ensure the competence of individuals providing language assistance, recognizing that the use of untrained individuals and/or minors as interpreters should be avoided.	<ul style="list-style-type: none"> <li>• TCHP partners with Texas Children's Human Resources department to evaluate language and communication proficiency of staff to determine fluency and appropriateness for serving as interpreters. TCHP does not utilize untrained individuals and/or minors as interpreters.</li> <li>• Employees are trained on the use of language assistance services, including the use of 2-1-1 for communication with individuals who may be hearing impaired.</li> <li>• TCHP offers language assistance for numerous languages at no cost to individuals who have limited English proficiency.</li> <li>• Language assistance is also available at no cost to providers in the network delivering care and services to TCHP Members.</li> </ul>
	8. Provide easy-to-understand print and multimedia materials and signage in the languages commonly used by the populations in the service area.	<ul style="list-style-type: none"> <li>• TCHP contracts with a national vendor that provides multi-language interpretation for print material and health information pieces.</li> <li>• TCHP has a process for translating material into languages other than English and for evaluating the quality of these translations. Responsibility for adherence to this process is held by TCHP Marketing.</li> <li>• All member materials are written at a 6th grade reading level and include information about how to request materials in different languages.</li> <li>• All member materials are available in Spanish.</li> <li>• TCHP's website is also available in Spanish.</li> <li>• Member portal is also available in Spanish.</li> </ul>
<b>Engagement, Continuous Improvement, and Accountability</b>	9. Establish culturally and linguistically appropriate goals, policies, and management accountability, and infuse them throughout the organization's planning and operations.	<ul style="list-style-type: none"> <li>• TCHP maintains a Cultural Competency Policy and Procedure that is available to all employees.</li> <li>• TCHP's governance structure includes a Cultural Competency Committee, that reports up to TCHP's Quality Committee, whereby the Cultural Competency Plan and associated activities, including policies and procedures, are reviewed at least annually.</li> <li>• TCHP employees are introduced to the Cultural Competency Plan and Annual Training at New Employee Orientation.</li> <li>• All TCHP employees are required to complete the online Cultural Competency training module each year. The expectation for completing the training is embedded as a performance management goal into the employee's annual evaluation.</li> </ul>

CLAS Standard	Component	Implementation Activities
<b>Engagement, Continuous Improvement, and Accountability</b>	10. Conduct ongoing assessments of the organization’s CLAS-related activities and integrate CLAS-related measures into measurement and continuous quality improvement initiatives.	TCHP CLAS-related activities are outlined in the Cultural Competency Plan. TCHP’s governance structure includes a Cultural Competency Committee, that reports up to TCHP’s Quality Committee, whereby the Cultural Competency Plan and associated activities, including policies and procedures, are reviewed at least annually. The plan is also reviewed by TCHPs Compliance Department to ensure we are meeting regulatory requirements.
	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 services delivery.	TCHP links demographic data with other types of data, e.g. quality of care data or considers demographic data in the development of specific health related programs to promote health equity and deliver outcomes that further inform service delivery to its members.
	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.	<ul style="list-style-type: none"> <li>• TCHP has in place a Member Advisory Group that represents the cultural and linguistic diversity of populations in the service areas. The Member Advisory Board is used to gather feedback on the needs of the community.</li> <li>• TCHP seeks input/feedback from members and families in the community to help plan and implement services that respond to the cultural and linguistic diversity of populations in the service areas</li> <li>• TCHP collaborates with other organizations and stakeholders in data collection, analysis, and reporting efforts to create the opportunity to better understand the cultural and linguistic diversity of populations in its service areas.</li> </ul>
	13. Partner with the community to design, implement, and evaluate policies, practices, and services to ensure cultural and linguistic appropriateness.	<ul style="list-style-type: none"> <li>• TCHP has Member Advisory and Focus groups that are culturally specific to learn how to provide culturally appropriate services to its members.</li> <li>• TCHP engages the media (billboards, TV, radio, message boards) using messaging in languages and location of its Members.</li> <li>• TCHP employs trained Community Health Workers (CHWs) who are trusted members of the community served. The CHWs provide input/feedback to TCHP leaders as appropriate to ensure cultural and linguistic characteristics of the community are represented.</li> </ul>
	14. Create conflict and grievance resolution processes that are culturally and linguistically appropriate to identify, prevent, and resolve conflicts or complaints.	<p>TCHP maintains a Conflicts and Grievance Resolution Policy and Procedure that is available to all employees.</p> <ul style="list-style-type: none"> <li>• Members are informed through multiple channels about their rights to provide feedback, including the right to file a complaint or grievance.</li> <li>• TCHP has a clear process to address instances of conflict and grievance that includes follow-up and ensures that the individuals are contacted with a resolution.</li> <li>• TCHP employs Member Advocates and Provider Complaint Resolution Specialists who are available to guide and support Members and Providers through the conflict resolution and/or grievance processes and for additional information on how to file a member or provider complaint or grievance please contact our Member Services and Provider Services Hotline.</li> </ul>
	15. Communicate the organization’s progress in implementing and sustaining CLAS to all stakeholders, constituents, and the general public.	TCHP utilizes various communication channels e.g. Member newsletter, Provider newsletter, website, blog posts, and social media to share the organization's commitment and progress in implementing and sustaining CLAS. TCHP hosts an annual Cultural Competency week, where there are dedicated activities and information sharing to publicize our current Cultural Competency Plan and efforts towards implementing and sustaining CLAS standards.