



2005 West 8th Street, Suite 208
Erie, PA 16505
814-480-8732
814-456-5524 FAX
www.provider-resources.com

Provider Resources, Inc. Cultural Competency Plan

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PROVIDER RESOURCES... *instilling integrity in healthcare*



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PRI'S APPROACH TO CULTURAL COMPETENCY

Provider Resources, Inc. (PRI), made up of healthcare experts with diverse backgrounds, innately has cultural awareness included within our corporate culture. PRI's mission and value statements are the foundation from which our cultural competency is built. PRI, recognizing the complexity of healthcare, is dedicated to supporting the healthcare community with compliance and integrity issues through education and efficient, innovative processes. In pursuit of our mission, PRI's personnel must always be mindful of the values each and every one of us must impart as individuals and together are the spirit of PRI. Our values must be soundly based upon the principles of honesty, sincerity, kindness, goodness, faithfulness, patience, understanding and—most importantly—*integrity*.

Our organization's goal is to instill integrity into the health care system from both program and clinical perspectives. This is accomplished through the provision of education and oversight services. While some of our clinical staff provides direct patient care, specifically members of our Physician Consortium for Clinical Integrity, the services PRI provides do not require direct patient care. It does however; require expert clinical and program knowledge. As our services are provided on a national level, cultural diversity is naturally embraced and acknowledged.

PRI celebrates diversity through the services that we offer and the expertise of our people. With a goal of instilling integrity into the healthcare system, we recognize that this can only be accomplished by embracing diversity. As an organization, we are comprised of a cohort of health policy, program integrity, education and outreach and quality improvement experts from virtually every geographic region of the Country and are unhindered by geographic constraints due to our virtual business model. We are a stronger organization because of our diverse workforce; each leveraging the variety of skill sets and talents of each other. Each of the members of our PRI family has distinctive expertise, experience, knowledge, education, and backgrounds. Our hiring processes are rigorous and comprehensive. Each candidate must complete a series of interviews and assessments. It is through these processes PRI assures a professionally accomplished, geographically, ethnically and racially diverse workforce dedicated to deliver superior services “on time” and “within budget.”

PRI further supports its diverse workforce through actively maintaining an Affirmative Action Program as one of several tools to implement the affirmative action policies effectively. The form, language and analysis of the program necessarily complies with the requirements of 41 CFR 60-2, et seq. (affirmative action programs) and other regulations established pursuant to the provisions of Executive Order 11246 and all other civil rights laws and regulations that have or may be enacted, as amended.

PRI applies the National Standards on Culturally and Linguistically Appropriate Services (CLAS) to our communications. Our cultural competency plan in full support of CLAS standards implements the use of interpreter services, bi-lingual staff, TTY and captioning capabilities for the hearing impaired to ensure our services are culturally and linguistically accessible. PRI has contractual relationships with organizations such as Certified Languages Inc. (CLI) and Colorado Caption to complement our capabilities. CLI provides 24/7 support for written and verbal interpreter services in over 175+ languages. Colorado Caption is a leading nationwide provider in captioning services for the hearing impaired and provides captioning for education seminars and conferences along with many other services.

PRI's is committed to clinical integrity and cultural competency through its URAC accreditation application as an independent review organization. PRI's cultural competency plan which

applies the National Standards on Culturally and Linguistically Appropriate Services (CLAS) standards is also in alignment with URAC standards. The following tables reference the CLAS standards and URAC standards and PRI's application of its policies, procedures, and resources which validate these requirements.

PRI'S CULTURAL COMPETENCY PLAN

CLAS Standard 1

Health care organizations should ensure that patients/consumers receive from all staff member's effective, understandable, and respectful care that is provided in a manner compatible with their cultural health beliefs and practices and preferred language.

PRI's Plan

PRI's policies and procedures enable us to provide services that meet or exceed our client's expectations and ultimately the populations that they may serve in the health care community. Our commitment is demonstrated through PRI's communications standards, Section 508 compliance plan, value statement and Quality Assurance (QA) Plan. The QA Plan ensures that the Section 508 compliance testing has occurred and that available resources are utilized to meet the audience's preferred language and facilitate communications for the hearing impaired through the use of TTY and/or captioning.*

**URAC Standards CORE 26 Access to and Monitoring of Services, CORE 21 Communication Practices, CORE 26 Access to and Monitoring of Services*

CLAS Standard 2

Health care organizations should implement strategies to recruit, retain, and promote at all levels of the organization a diverse staff and leadership that are representative of the demographic characteristics of the service area.

PRI's Plan

PRI provides clinical education and oversight services on a national level therefore, not one specific service area is represented. In order to fulfill PRI's mission, we recruit personnel on a national basis and include culturally and ethnically diverse job posting websites in our recruitment efforts.

PRI has a diverse workforce as demonstrated by the over 40 different job descriptions currently at PRI representing the various opportunities provided to our workforce. Staff qualifications are matched to job descriptions to ensure job requirements are met. PRI further supports its diverse workforce through actively maintaining an Affirmative Action Program as one of several tools to implement the affirmative action policies effectively.*

** URAC Standards CORE 4 Job Descriptions, CORE 5 Staff Qualifications, CORE 6 Credentialing, CORE 8 Staff Operational Tools and Support*

CLAS Standard 3

Health care organizations should ensure that staff at all levels and across all disciplines receive ongoing education and training in culturally and linguistically appropriate service delivery.

PRI's Plan

PRI maintains training is paramount to ensure a culture of compliance. PRI employees are expected to attend several training sessions surrounding compliance. Additional trainings based upon the employee's position/role and responsibility specific to compliance, orientation of the company and/or resources available within the company or contract specific are be required.

Our corporate culture based on PRI's mission and value statements is described throughout our employee handbook. All employees are required to read and acknowledge their understanding of the employee handbook ensuring each employee is equipped to carry out their responsibilities in alignment with PRI's values.*

** URAC Standard CORE 7 Staff Training Program*

CLAS Standard 4

Health care organizations must offer and provide language assistance services, including bilingual staff and interpreter services, at no cost to each patient/consumer with limited English proficiency at all points of contact, in a timely manner during all hours of operation.

PRI's Plan

In addition to PRI's bi-lingual staff, we have engaged with Certified Languages Inc. (CLI) who provides 24/7 support for written and verbal interpreter services in over 175+ languages. CLI's credentialing process includes training focused on terminology, sentences, and role playing and also requires for interpreters to agree with a Conduct, Procedures & Professional Code of Ethics and Statement of Neutrality and Confidentiality. CLI meets the new Joint Commission standards regarding language services, and is HIPAA and HITECH Act compliant and Safe Harbor certified. PRI can provide this service at no cost to patient/consumers who have limited English proficiency.*

** URAC Standards CORE 21 Communication Practices, CORE 22 Consumer Communication Plan, CORE 26 Access to and Monitoring of Services*

CLAS Standard 5

Health care organizations must provide to patients/consumers in their preferred language both verbal offers and written notices informing them of their right to receive language assistance services.

PRI's Plan

In addition to PRI's bi-lingual staff, we have engaged with Certified Languages Inc. (CLI) who provides 24/7 support for written and verbal interpreter services in over 175+ languages. CLI's credentialing process includes training focused on terminology, sentences, and role playing and also requires for interpreters to agree with a Conduct, Procedures & Professional Code of Ethics and Statement of Neutrality and Confidentiality. CLI meets the new Joint Commission standards regarding language services, and is HIPAA and HITECH Act compliant and Safe Harbor certified. PRI can provide this service at no cost to patient/consumers who have limited English proficiency.*

**URAC Standards CORE 22 Consumer Communication Plan, CORE 26 Access to and Monitoring of Services*

CLAS Standard 6

Health care organizations must assure the competence of language assistance provided to limited English proficient patients/consumers by interpreters and bilingual staff. Family and friends should not be used to provide interpretation services (except on request by the patient/consumer).

PRI's Plan

PRI believes in ensuring the integrity and transparency in accurate communications and believe it is best to use an independent party when providing interpretation services. In addition to PRI's bi-lingual staff, we have engaged with Certified Languages Inc. (CLI) who provides 24/7 support for written and verbal interpreter services in over 175+ languages. CLI's credentialing process includes training focused on terminology, sentences, and role playing and also requires for interpreters to agree with a Conduct, Procedures & Professional Code of Ethics and Statement of Neutrality and Confidentiality. CLI meets the new Joint Commission standards regarding language services, and is HIPAA and HITECH Act compliant and Safe Harbor certified. PRI can provide this service at no cost to patient/consumers who have limited English proficiency.*

**URAC Standards CORE 22 Consumer Communication Plan, CORE 26 Access to and Monitoring of Services*



CLAS Standard 7

Health care organizations must make available easily understood patient-related materials and post signage in the languages of the commonly encountered groups and/or groups represented in the service area.

PRI's Plan

PRI's materials are based on a needs assessment conducted with the client and are developed specific to the population and the community that they serve. Materials are developed in multiple languages when required.*

**URAC Standard CORE 22 Consumer Communication Plan*

CLAS Standard 8

Health care organizations should develop, implement, and promote a written strategic plan that outlines clear goals, policies, operational plans, and management accountability/oversight mechanisms to provide culturally and linguistically appropriate services.

PRI's Plan

PRI develops a needs assessment with the client and develops project plans on a contract and/or case by case/task specific basis to determine to determine population and communication needs.*

**URAC Standards CORE 3 Policy and Procedure Maintenance, Review, and Approval, CORE 8 Staff Operational Tools and Support, CORE 34 Quality Management Documentation*

CLAS Standard 9

Health care organizations should conduct initial and ongoing organizational self-assessments of CLAS-related activities and are encouraged to integrate cultural and linguistic competence-related measures into their internal audits, performance improvement programs, patient satisfaction assessments, and outcomes-based evaluations.

PRI's Plan

Through PRI's Quality Assurance (QA) Plan requirement for continuous quality improvement and the employment of URAC and ISO management standards, the organization captures lessons learned and best practices. Monitoring and auditing of contract activities is conducted which is a requirement of our compliance plan and is a component of our QA plan.*

** URAC Standards CORE 9 Staff Assessment Program, CORE 26 Access to and Monitoring of Services, CORE 35 Quality Improvement Project Requirements, CORE 36 Quality Improvement Project Goals and Measurement, CORE 32 Quality Management Program Requirements, CORE 34 Quality Management Documentation*

CLAS Standard 10

Health care organizations should ensure that data on the individual patient's/consumer's race, ethnicity, and spoken and written language are collected in health records, integrated into the organization's management information systems, and periodically updated.

PRI's Plan

PRI's Information Technology Security Plan contains several policies to protect and preserve and Protected Health Information (PHI) that PRI may have access to or is provided related to contract performance.

CLAS Standard 11

Health care organizations should maintain a current demographic, cultural, and epidemiological profile of the community as well as a needs assessment to accurately plan for and implement services that respond to the cultural and linguistic characteristics of the service area.

PRI's Plan

PRI develops a needs assessment with the client and develops project plans on a contract and/or case by case/task specific basis to determine to determine population and communication needs.

CLAS Standard 12

Health care organizations should develop participatory, collaborative partnerships with communities and utilize a variety of formal and informal mechanisms to facilitate community and patient/consumer involvement in designing and implementing CLAS-related activities

PRI's Plan

Due to the nature of PRI's work, it is embedded in our culture to work with well rounded and diverse organizations to assist us in the oversight and delivery of services and to meet contract requirements when necessary. In working with partner organizations, we celebrate the diversity among different types of organizations, such as non-profits, and accommodate the working relationships and styles to successfully accomplish the goals.

CLAS Standard 13

Health care organizations should ensure that conflict and grievance resolution processes are culturally and linguistically sensitive and capable of identifying, preventing, and resolving cross-cultural conflicts or complaints by patients/consumers.

PRI's Plan

PRI's value statement supports the differences represented between organizations and their cultures and we make every effort to transcend communications. If the difference is linguistic or hearing impaired in nature we engage the appropriate services. We recognize that there may be organizational cultural differences with the partner organizations we will work with and we modify our processes to accommodate such differences, such as meeting times and

places, in order to have strong, clear and transparent communications between the organizations.

Client feedback or complaints relating to our services is a high priority for our management team to address in a timely manner. Every employee must understand the appropriate reporting and handling procedure related to client complaints. The Program Manager typically receives client feedback or complaint since they are the primary interface with our clients. However, complaints can be received by any employee in the company and employees must report complaints in a timely manner to the appropriate Program Manager and/or Division Director for appropriate and timely handling. Program Managers are responsible to immediately notify the Division Director of any complaints and also discuss the complaint during the weekly Program Manager's meeting to allow for best practices to be shared and developed if appropriate. The Division Director is responsible to report client complaints to the CEO and CCO along with any proposed mitigation strategy.

CLAS Standard 14

Health care organizations are encouraged to regularly make available to the public information about their progress and successful innovations in implementing the CLAS standards and to provide public notice in their communities about the availability of this information.

PRI's Plan

PRI publishes our cultural competency plan within our employee handbook and the employee intranet website, and has future plans to publish the plan on our Corporate website.