



HURON BEHAVIORAL HEALTH OPERATIONAL POLICY

Policy #: RR.1.03
Issue Date: 06/27/02

Rev. Date: 01/02/18
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Title: Cultural Competence Policy

Prepared By: Executive Director

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Purpose:

To define the philosophies, principles, and practices of Huron Behavioral Health with regard to cultural diversity and sensitivity. This policy is established to comply with federal and state requirements to provide culturally competent supports and services to all enrollees, including individuals with limited English Proficiency (LEP), diverse cultural and ethnic backgrounds, and special communication needs.

Scope:

This policy applies to all employees (including full-time employees, part-time employees, contractual providers, volunteers, students, and/or interns) of Huron Behavioral Health (HBH) and all individuals served.

Information:

1. Cultural competence includes a general awareness of the cultural diversity of the service area including race, culture, religious beliefs, and regional influences in addition to the more typical social factors such as gender, gender identity, sexual orientation, marital status, education, employment, and economic factors, etc.
2. The word "culture" implies the integrated patterns of human behavior that includes thoughts, communications, actions, customs, beliefs, values, and institutions of racial, ethnic, religious, or social groups.
3. The word "competence" implies having the capacity to function within the context of culturally integrated patterns of human behavior defined by the group.
4. Some of the ways that HBH monitors the community needs includes, but is not limited to:
 - Identifying non-English languages and ethnic and cultural backgrounds which staff is likely to encounter by estimating the number of LEP persons, and persons from other ethnicities and cultures, who are eligible for services. This is done by using census data, consumer utilization data, and data from school systems, community agencies, community needs assessments, and data from other county organizations.
 - Identifying the language and cultural needs of each person served and documenting this information in the consumer's case record so other providers are also aware of any special needs.
 - Identifying the points of contact where language and other assistance may be needed.
 - Identifying the resources needed to provide effective language assistance, the availability and location of resources, and the arrangements needed to make access to these resources efficient and timely (see also ["Limited English Proficiency \(LEP\) Policy" RR.1.01](#)).
5. HBH has developed a written Cultural Competence Plan that reflects a commitment to provide services in a manner respectful of language and cultural diversity and ensures that agency interactions with persons with LEP, or cultural differences, are as effective as its interactions with others. This includes affirmative efforts to ensure the cultural competency of providers/staff. The plan also addresses:
 - Policies and procedures for obtaining and providing trained and competent interpreters and other language assistance services.
 - Identification, development, and implementation of a plan to provide written materials in languages other than English, when a significant number or percentage of the population eligible for services will need information in those languages.
6. The Federal Register Part IV Department of Labor Policy Guidance will be utilized to determine the vital documents and will provide interpreter/translator services as needed on such documents as consent forms, letters/correspondence, advance and adequate notices, communications on the right to grievance and appeal actions, or that require a response from the consumer, and notices advising the consumer of the availability of free language assistance in all non-English languages that HBH can reasonably expect to encounter.

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7. HBH assesses and monitors services to ensure that current policies and procedures related to LEP and cultural competency are effective by seeking feedback from consumers and employees, reviewing the current and future needs, and assuring staff is trained in cultural competence philosophies. New employees receive cultural competence training during orientation which includes LEP policies and procedures. Additionally, annual training is provided to all staff (see also "[Training Goals and Requirements for HBH Employees Procedure](#)" (TR.2.03)).
8. HBH evaluates the overall effectiveness of cultural competency and language proficiency efforts through monitoring and periodic evaluation. Monitoring will explore whether HBH's current cultural and linguistic competencies accurately reflect the diversity of the service area. Annual monitoring for outcomes will also include information on consumer grievances related to LEP and cultural competency (see [RR.1.02 "Limited English Proficiency \(LEP\) Accommodation Policy"](#) and [RR.2.46 "Limited English Proficiency Procedure"](#)).
9. Alternative Communication Formats:
 - HBH will provide services in a manner that assures such services are equally accessible to all individuals who may require an alternative method of communication.
 - HBH will present materials in a manner appropriate to the individual's condition and his/her ability to understand/comprehend the information. Informational materials will be provided in a manner and format that is easily understood and is written at a fourth grade reading level whenever possible. (Note - it is understood that some necessary information such as diagnosis, medications, and conditions may not meet this criteria).
 - HBH will make available written materials and vital documents in alternative formats that address the special needs of consumers, at no cost to the consumer, for example, providing materials and vital documents in Braille or on audio tapes for consumers who have an impairment that impacts their ability to effectively communicate due to limitations in vision or hearing.
 - HBH has procedures in place for educating and training staff regarding the availability and processes to obtain information in alternative formats.

Policy:

1. It is the policy of Huron Behavioral Health that all services shall reflect an ongoing commitment to accommodate cultural and linguistic diversity in order to ensure access and meaningful participation for all individuals in the service area. Such commitment includes acceptance and respect for the cultural values, beliefs and practices of the community, as well as the ability to apply an understanding of the relationships of language and culture to the delivery of supports and services. This includes accommodations for alternative communication methods. It also includes identifying Indian children and collaborating with the appropriate tribe or Indian organization and helping maintain connections between the family and tribe, as appropriate. (See also "[Limited English Proficiency \(LEP\) Policy](#)" (RR.1.01), "[LEP Accommodation Policy](#)" (RR.1.02), and "[Services to the American Indian Child Procedure](#)" SD.2.04).
2. It is also the policy of Huron Behavioral Health that behavioral health services will be available and provided to all qualifying Huron County residents. These services will be provided by employees who demonstrate competence in cultural sensitivity when providing mental health services. HBH staff will provide services in a manner that assures all programs and services are equally accessible to all individuals who may require an alternative method of communication.
3. HBH has an internal Cultural Competence Committee that meets at least quarterly (see also "[Cultural Competence Committee Procedure](#)" (QI.2.32)). This committee develops an annual Cultural Competence Plan which is presented to the Board of Directors and is implemented and monitored by the committee.
4. The HBH Board of Directors as well as the HBH Administration supports the efforts of staff to maintain a high level of cultural competence. The standards for Cultural Competence Training curriculum will be reviewed and approved by the Cultural Competence Committee (see also "[Cultural Competence Committee Procedure](#)" RR.2.32).

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5. All employees will receive cultural competence training as a part of new employee orientation and on an annual basis thereafter (see "[Training Goals and Requirements for HBH Employees Procedure](#)" - TR.2.03).
6. The goal of training is to enhance the ability of staff to comprehend and incorporate the cultural diversity of the community to enable them to provide services in the most effective manner in order to meet the needs of the consumer, including their cultural needs. As a result training is:
 - Supported by Administration and the Board
 - Reflective of the diversity of the community
 - Held on a regular, on-going basis (not less than annually)
 - Provided in a variety of means for continuing education
 - Reflective of issues staff have requested
 - Required in the annual training plan for every employee and reviewed annually in employee appraisals (see "[Employee Performance Appraisal/Evaluation Procedure](#)" HR.2.05)
7. Cultural competence will be measured by the following methods which may include but is not limited to:
 - Feedback from trainings
 - Responses from consumer satisfaction surveys
 - Feedback from Consumer Advisory Council
 - Input from peer discussion groups
 - Responses from Community Focus Groups/Community Needs Assessments
8. HBH strives to maintain a staff composition that reflects the cultural diversity of the community and to maintain its high standards relative to employee skills, education, and cultural sensitivity.

Definitions/Acronyms:

Acronyms:

HBH – Huron Behavioral Health

LEP – Limited English Proficiency

MDHHS – Michigan Department of Health and Human Services

ORR – Office of Recipient Rights

PIHP – Pre-paid Inpatient Health Plan

Definitions:

Accommodations: Internal or external resources needed to ensure the consumer is afforded meaningful access to services at no cost to the consumer. Examples include augmentative communication specialists, voice interpreters, interpreter/translation services, etc.

Cultural Competence: refers to a set of congruent behaviors, attitudes, beliefs, practices, and procedures that come together in a system, agency or among professionals to enable that system, agency, or those professionals to work effectively in cross-cultural situations. It is an ongoing process by which individuals and systems respond respectfully and effectively to all people in a manner that recognizes, affirms, and values diverse populations.

Limited English Proficiency/LEP: Is the inability to speak, read, write, or understand English at a level that permits effective interaction with health care providers. Accommodating LEP is the responsibility of providers of health and social services who receive Federal Financial Assistance from the U.S. Department of Health and Human Services.

Population Eligible for or Likely Impacted by the Program or Services: Those persons who are in the geographic area that has been approved as the service provider's service area, and who are either eligible for benefits or services provided by the entity, or otherwise, are directly affected by such an entity's policies and practices. An example is a parent who is seeking services for a child. The child is the one who is eligible for services, but the parent is also impacted by the entity's policies and practices.

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Forms:

N/A

Records:

N/A

Reference(s) and/or Legal Authority

COA standards

MDHHS/PIHP Medicaid Managed Specialty Supports and Services Contract

Executive Order 13166 @ <https://www.justice.gov/crt/executive-order-13166>Department of Labor Policy Guidance on LEP @ <https://www.dol.gov/oasam/regs/fedreg/notices/2003013125.htm>[HR.2.05 Employee Performance Appraisal/Evaluation Procedure](#)[TR.2.03 Training Goals and Requirements for HBH Employees Procedure](#)[RR.1.01 Limited English Proficiency \(LEP\) Policy](#)[RR.1.02 Limited English Proficiency \(LEP\) Accommodation Policy](#)[RR.2.46 Limited English Proficiency \(LEP\) Procedure](#)[QI.2.32 Cultural Competence Committee Procedure](#)[SD.2.04 Services to the American Indian Child Procedure](#)**Change History:**

Change Letter	Date of Change(s)	Changes
A	03/28/03	Brought into new documentation system and new format with minimal content changes: combined "Cultural Competency Definition Policy" and "Cultural Competence Policy" into one policy (RR.1.02)
B	12/09/05	Removed all sections & references that related to LEP and put those items into the agency's various LEP policies (RR.1.01 & RR.1.02).
C	08/28/08	Revised to comply with regional AAM Policy (11.5.6 dated 04/17/08).
D	06/17/09	Reviewed and revised to comply with COA 8 th Edition Standards and present practices, also incorporated regional added "including their cultural needs" to #5, added second sentence in #1,
E	03/20/13	Reviewed and revised to comply with 8 th edition COA standards –in #1 added reference to RR.1.01 & RR.1.02, added "QI.2.32 Cultural Competence Committee Procedure" reference (2 places), added #3, added last bullet (Focus Groups) in #6.corrected several typos and grammatical errors without changing sentence content.
F	10/29/14	Removed references to "AAM" throughout document (6 places), corrected staff titles, made several minor grammatical changes without changing content, in "Information" section #6 removed "annually", .
G	03/22/16	Reviewed and revised to comply with MSHN policy "Service Delivery System – Cultural Competence" – In "Purpose" section added provide culturally competent supports and services" and removed "promote the delivery of services in a competent manner", in "Information" section removed previous statement and moved it to "Definitions" section and replaced with current paragraph, in "Policy" section #1 added 2 nd sentence, made several additional minor grammatical changes/corrections for clarification without c hanging sentence content.
H	01/02/18	Added references to "HR.2.05" (2 places), in "Acronyms" section added "LEP" & changed "MDCH" to "MDHHS", made numerous minor wording/grammatical changes/corrections throughout document without changing sentence content.