

Focus Area 1: Culturally and Linguistically Appropriate Grievance and Appeals

Background: PacificSource’s grievance (complaints) and appeals processes comply with state and federal laws. Still, there are improvements to ensure the process is simple, accessible, and clear. There is very little understanding among members and community agencies with respect to how this process works. We heard from community sessions concerns of retaliation, meaning that some people might lose access to services or be reported to government officials if their immigration status is questioned. Some communities are also culturally hesitant to complain especially when the process is perceived as potentially threatening. Community members recommended offering an anonymous feedback option, to better learn and monitor where issues are happening. Members can find complaints and appeals processes in the member handbook, which can be found on our website, however, it can be challenging for members to easily find this information. As such, our strategies under this focus area are intended to address these key issues.

Plain Language Strategies	Plain Language Goals
Strategy 1: Provide new training for Traditional Health Workers and staff and create educational tools to improve member and community knowledge of complaints and appeals processes.	Goal 1: Develop and deliver at least one training to the Traditional Health Worker workforce on complaints and appeals.
	Goal 2: Make changes to PacificSource staff trainings to enhance non-retaliation messaging and considerations for people with disabilities, LGBTQ+, and people with cultural (including mixed-immigration status families) and/or linguistic needs.
	Goal 3: Make website improvements including a link for information about complaints and appeals that is culturally and linguistically appropriate and in plain language. Link to a web-based form to file a complaint.
	Goal 4: Involve Community Advisory Council and Health Equity Coalitions to gather feedback on new tools and materials.
Strategy 2: Increase access for members to provide feedback to the CCO, increase overall member confidence and comfort when communicating with PacificSource.	Goal 1: Include a non-retaliation statement on any new educational material. This statement will also be used in our customer service phone calls.
	Goal 2: Provide both an anonymous and an identified feedback option for members.
	Goal 3: Evaluate and monitor member experience, satisfaction and access to complaints and appeals processes through member surveys.
Strategy 3: Track and analyze complaints using demographic data for regular and continuous monitoring and follow-up.	Goal 1: Evaluate complaints made by race, ethnicity, language and disability data (REALD), where available.
	Goal 2: Compare information on REALD with non-REALD to create a starting point on how populations are accessing complaints and appeals processes.

Focus Area 2: Demographic Data: Race, Ethnicity, Language and Disability Data (REALD)

Background: PacificSource Community Solutions has made demographic data collection and analysis a priority, however, there are significant challenges that need to be addressed before we can collect and store data from sources other than the information we received from the state when members enroll in OHP. The vision for this work is to get at a “source of truth” as we compare and integrate data sources. Outside of enrollment data, there are limited opportunities for PacificSource to collect REALD data directly from members (e.g. disease management programs, member surveys), and data that are collected this way are not accessible across the whole organization. There are opportunities to get more detailed information about our members to allow more culturally appropriate and equitable approaches to care. Community members at our listening sessions suggested opportunities to better reflect members’ personal characteristics and preferences including more options for race, ethnicity, gender/sexual orientation, Tribal affiliation and the collection and use of pronouns.

Plain Language Strategies	Plain Language Goals
Strategy 1: Test solutions to store and maintain REALD data (from multiple sources).	Goal 1: Establish internal storage and maintenance of REALD in a data warehouse.
	Goal 2: Align with PacificSource’s Health Information Exchange/ Technology (HIE/T) roadmap.
Strategy 2: Identify important ways to apply REALD data to ensure members are receiving culturally and linguistically appropriate services and communications.	Goal 1: Work across the organization with internal teams to prioritize key opportunities for integrating REALD data.
	Goal 2: Support priority areas identified by making the necessary changes to analytics processes to ensure integration of REALD data.
Strategy 3: Develop consistent processes for REALD data collection, including sexual orientation and gender identity, across the CCO network.	Goal 1: a) Conduct literature review. b) Conduct assessment with one Federally Qualified Health Center (FQHC) and one non-FQHC to document and analyze current REALD collection practices.

Focus Area 3: Culturally and Linguistically Appropriate Services (CLAS)

Background: The strategy within this focus area is designed to identify and address gaps and opportunities to improve the delivery of CLAS within the CCO and its network of providers. While PacificSource, is compliant with regulations regarding language access and accessibility, we recognize the need to enhance our capacity to track, monitor and improve internal processes. This will ensure the cultural and linguistic needs of our members are met. A key barrier our organization has faced in accomplishing this is how CLAS work is spread across departments. Organizational assessment, including review of policies and procedures from a CLAS and equity lens, has not been routinely undertaken or led by any one accountable department. These strategies and goals are designed to improve internal processes and strengthen provider adherence to CLAS.

Plain Language Strategies	Plain Language Goals
Strategy 1: Align CLAS Standards to CCO planning and identify opportunities for integration.	Goal 1: Complete an organizational self-assessment on CLAS.
Strategy 2: Designate internal structure for Communication and Language Assistance accountability.	Goal 1: Hire a Communication and Language Assistance Program Manager and designate an accountable department.
Strategy 3: Implement PacificSource’s Language Access Plan to improve accessibility to oral and sign language interpretation.	Goal 1: Make Language Access Plan accessible to providers.
	Goal 2: Review contract language to ensure provider accountability for having language access policies and procedures.

Focus Area 4: Culturally and Linguistically Appropriate Services (CLAS) as an Organizational Framework

Background: Health disparities in racial and ethnic minorities, people with limited English proficiency (LEP), people with low health literacy, sexual and gender minorities and people with disabilities continue to persist. This Focus Area enhances an internal and external focus on CLAS Standards and will focus on further promoting CLAS as an equity guide for the CCO, beginning with education provided to our community-based governance body, and allocation of additional resources that support and advance CLAS as a system-wide priority.

Plain Language Strategies	Plain Language Goals
Strategy 1: Establish shared understanding of and accountability for advancing CLAS between PacificSource and our governing board, the regional Health Council.	Goal 1: Provide education about CLAS to Health Council Board, Clinical Advisory Panel, and the Community Advisory Panel.
	Goal 2: Share the results of PacificSource’s organizational self-assessment with the CCO Health Council.
Strategy 2: PacificSource leadership prioritizes CLAS and sets up resources that support advancement of CLAS and health equity.	Goal 1: Racial and health equity language, actions and accountability will be included in the company-wide strategic plan.
	Goal 2: Create a way to track and ensure adequate dollars are in PacificSource’s budget, to support work focused on Diversity, Equity, Inclusion and CLAS.

Focus Area 5: Workforce Diversity

Background: We want our staff at PacificSource to mirror the diversity of our members. We have recently added recruiters to our Human Resources team. They have created a plan called “Stronger Together.” This plan focuses on hiring people from different cultures and that speak different languages. It also focuses on supporting diverse staff to feel welcomed and included in the workplace.

At our listening sessions, community members also said they wanted clinic staff to mirror the cultures and languages spoken by members.

Plain Language Strategies	Plain Language Goals
Strategy 1: Follow our new diverse hiring plan.	Goal 1: Attend at least 2 community diversity events in the region.
	Goal 2: Attend at least 2 university events.
Strategy 2: Make sure that employees from diverse backgrounds have equitable opportunities for job promotion and advancement.	Goal 1: Encourage minority employees to enroll in our leadership training program, or other programs that help them grow in their job.
	Goal 2: Train managers on diversity practices for hiring, retaining and promoting employees.
Strategy 3: Create a Diversity Taskforce to support diversity, equity and inclusion efforts.	Goal 1: The Diversity Taskforce will meet 4 times a year.
	Goal 2: The Diversity Taskforce will identify 3 ways to make our workplace culture more inclusive of employees from diverse backgrounds.
Strategy 4: Promote and support job development programs in the community that work to increase diversity in healthcare services	Goal 1: At least \$5,000 will go towards these community programs.
	Goal 2: Offer grant money to providers and other subcontractor partners to help them recruit staff from diverse backgrounds.

Focus Area 6: Organizational Training and Education Plan

Background: In 2019, PSCS committed to an enterprise-wide strategy to address health equity through investments in employee education and awareness on Cultural Responsiveness and Implicit Bias. Additionally, the 2020 PacificSource provider contracts require that providers participate in both cultural competence and implicit bias training. We plan to make this content available to our provider partners who do not have the capacity to offer the training to their employees. We will conduct regular assessments of the CCO's Provider Network to identify training needs and develop training opportunities to meet identified needs and OHA training requirements.

Plain Language Strategies	Plain Language Goals
Strategy 1: Provide fundamental training to build cultural responsiveness among CCO leadership and staff	Goal 1: At least 85% of PSCS staff and leadership will participate in equity trainings.
	Goal 2: At least 75% of Health Council Board and Community Advisory Council (CAC) members will participate in equity trainings
	Goal 3: Offer at least two additional learning opportunities for PSCS staff.
Strategy 2: Provide fundamental training to build cultural responsiveness among CCO providers and subcontractors	Goal 1: Provide at least two activities to educate providers about the new training requirements for CCO 2.0
	Goal 2: Establish baseline number of provider participants who have completed equity training.
	Goal 3: Establish baseline number of providers trained in trauma informed care provided by PSCS.
	Goal 4: Offer at least two additional Health Equity training opportunities to providers.
Strategy 3 Develop the tools needed to deliver training and track data related to participation and learning outcomes.	Goal 1: Establish internal system to develop, implement and track training requirements.
	Goal 2: Develop a confirmation process to continually monitor training compliance system wide.
	Goal 3: Identify technology and software solutions for data collection and maintenance to track external trainings.

Focus Area 7: Language Access Reporting Mechanism

Background: Adequate language access is important in ensuring PSCS members are receiving the services and/or care they need to achieve their optimal health. PSCS has a Language Access Plan (LAP) and recognizes the need to invest resources, develop processes and implement tracking mechanisms to ensure our organization and provider network provides readily available, high-quality, language assistance services. We sought to gain a better understanding of how our members are experiencing these services. Here are several important observations:

- Inadequate availability, training and processes related to interpreter services
- Inconsistency in the quality of interpreter
- Interpreters sometimes show up late or not at all
- Lack of appropriate options for the deaf population (i.e. some people do not use ASL, and would prefer to read lips)
- Relay Calling over TTY is preferred among deaf and hard of hearing

Plain Language Strategies	Plain Language Goals
Strategy 1: Improve access and quality of interpretation services by establishing tracking tools.	Goal 1: Asses the capacity of the interpretation network, including American Sign Language (includes onsite clinical interpreter workforce).
	Goal 2: Collect, analyze and track data on the experiences of members with interpretation services (include new ways to track onsite clinical interpretation).
	Goal 3: Ensure health care clinics and providers have policies and procedures for language assistance.
Strategy 2: Improve provider knowledge of language assistance best practices.	Goal 1: Provide Trauma-Informed training for interpreters.
	Goal 2: Promote use of Relay Calling for deaf/hard of hearing members.
	Goal 3: Provide provider education on how to work with interpreters.
	Goal 4: Improve access to Preferred Language Cards.

Focus Area 8: Member Education and Accessibility

Background: Nearly 9 out of 10 American adults have difficulty understanding and using the information they receive about their health and healthcare. At PacificSource, we make sure our written materials for members (such as letters, fliers and member handbook) are at a 6th grade reading level. However, we know that is just one of many steps to communicating in plain language. Community members at our listening sessions suggested other ideas, including:

- Keep it short and simple
- Use less big words
- Add more pictures and white space
- Edit into plain language before translating it in other languages
- Communicate important information in multiple formats, including audio and video

Plain Language Strategies	Plain Language Goals
Strategy 1: Improve our process for reviewing member materials to make sure they are written in plain language.	Goal 1: Revise the member handbook to make it easier to read.
	Goal 2 & 4: Review all member material and revise at least 3 to make them easier to read. Then share with the Community Advisory Council (CAC) for review.
	Goal 3: Create instructions for staff on how to write in plain language.
Strategy 2: Share important information with members in other formats like audio and video.	Goal 1: Create a short and simple educational tool on how to submit a complaint or appeal. This will be in English, Spanish and American Sign Language.