

**DBHS  
Cultural Competency Plan  
2009 – 2010**

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	Identified Requirement	DBHS and/or T/RBHA Initiative	Assigned Parties	Monitoring Activities
<b>1</b>	<b>CMS REQUIREMENTS</b>			
1.1	CLAS Standards – improving compliance and enforcement of CLAS Standards.	Education and Training Communication/Marketing and Outreach 4 CLAS Standards are federally mandated and ADHS/DBHS have currently implemented 7 CLAS Standards	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.
1.2	Cultural Considerations- Participate in State's efforts to promote the delivery of services in a culturally competent manner to all enrollees, including those with limited English proficiency (LEP) and diverse cultural and ethnic backgrounds.	Education and Training Communication/Marketing and Outreach LEP is a CLAS Standard	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.
1.3	Providers who speak languages other than English.	Data Collection and Report Production – Network Plan/Inventory	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.
1.4	Printed materials in languages other than English.	Communication/Marketing and Outreach This requirement is monitored through the Administrative Review MI Standards, desktop protocols, and quarterly material submissions.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.

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1.5	Available interpretation services.	Education and Training Policies and Procedures/ Regulations ADHS/DBHS has information provided on the agency website and brochures	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.
<b>2</b>	<b>AHCCCS CONTRACT REQUIREMENTS</b>			
2.1	All member informational materials shall be reviewed for accuracy and approved by ADHS prior to distribution to members. All materials shall be translated when ADHS is aware that a language is spoken by 3,000 individuals or ten percent (10%) (Whichever is less) of members in a geographic area who also have Limited English Proficiency (LEP). All vital material shall be translated when ADHS is aware that a language is spoken by 1,000 or five percent (5%) (Whichever is less) of members in a geographic area who also have. Vital materials must include, at a minimum, notices for denials, reductions, suspensions or terminations of services, consent forms, communications requiring a	This requirement is monitored through the Administrative Review MI Standards, training and education, Grievance process, and CLAS Standards (LEP).	ADHS/DBHS T/RBHAs	1. The RBHA contracts note that contractors shall translate materials, but not all language is included.  2. All language will be added to future RBHA contracts.  3. Draft internal procedures and create a log/inventory for approval of informational materials.  4. Create a log/inventory of materials that have been translated into other languages.  5. Collect and analyze data pertaining to languages spoken by members on an annual basis.  6. This requirement is monitored annually during the Administrative Review.

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	response from the member, informed consent and all grievance, appeal and request for state fair hearing information included in the Grievance System Standards and. When there are program changes, notification will be provided to the affected Title XIX and Title XXI members at least 30 days before implementation.			
2.2	ADHS shall ensure that interpreters of any language are available free of charge for members to ensure appropriate delivery of covered services. ADHS shall ensure members are provided with information instructing them how to access these services.	Education and Training Communication/Marketing and Outreach Policies and Procedures/ Regulations ADHS/DBHS has information provided on the agency website, brochures, signage	ADHS/DBHS T/RBHAs	<ol style="list-style-type: none"> <li>1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, policies and procedures manual, and member handbook.</li> <li>2. DBHS is determining the feasibility of incorporating a question in the customer satisfaction survey to confirm if interpretation services are provided at no cost. If, possible the question will be added.</li> <li>3. This requirement is monitored annually during the Administrative Review.</li> </ol>
2.3	ADHS and subcontractors shall make every effort to ensure that all information prepared for distribution to members is written using an easily understood language and format and as further described in the ACOM Member	Education and Training Communication/Marketing and Outreach Policies and Procedures/ Regulations This requirement is monitored through the Administrative Review MI Standards	ADHS/DBHS T/RBHAs	<ol style="list-style-type: none"> <li>1. Requirement is in the T/RBHA contracts Scope of Work and the Member Handbooks.</li> <li>2. RBHAs must submit an annual report indicating the number of staff and providers who have the capacity to serve</li> </ol>

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	Information Policy, as applicable. Regardless of the format chosen by ADHS and subcontractors, the member information must be printed in a type, style, and size which can be easily read by members with varying degrees of visual impairment or limited reading proficiency. ADHS and its subcontractors must notify its members that alternative formats are available and how to access them.			individuals with developmental disabilities and who speak a language other than English.
2.4	<p>Provider Network: ADHS shall ensure that within 10 days of their first service members are provided with a description of the provider network. ADHS shall ensure that the following information is provided to all behavioral health recipients:</p> <p>1. Names, locations, telephone numbers of, and non-English languages spoken by current contracted providers in the behavioral health recipient's service area, including identification of providers that are not accepting new referrals.</p>	<p>Communication/Marketing and Outreach This requirement is monitored through the Network Inventory Plan</p>	ADHS/DBHS T/RBHAs	<p>1. Requirement is in the T/RBHA contracts Scope of Work, member handbook, provider manual, and policies and procedures manual.</p> <p>2. This requirement will be monitored annually during the Administrative Review. A standard may be added to the Cultural Competency Standards or to the Network Standards to monitor if T/RBHAs provide members with a network list, including the non-English languages spoken by providers.</p> <p>3. DBHS is considering requiring the T/RBHAs to submit a list of providers who speak other languages to DBHS as a component of the Network Inventory List.</p>

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2.5	Member's right to be treated fairly and with respect regardless of race, religion, sex, age, sexual preference, or ability to pay.	Education and Training Communication/Marketing and Outreach Policies and Procedures/ Regulations This requirement is monitored through the Administrative Review MI Standards	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Standard Terms and Conditions, member handbook, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.
2.6	Instructions for obtaining culturally competent materials, including translated member materials. Members have the right to know of providers who speak languages other than.	Communication/Marketing and Outreach This requirement is monitored through the Administrative Review MI Standards, desktop protocols, and member handbook.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.
2.7	The availability of interpretation services for oral interpretation at no cost to the member and how to obtain these services.	Education and Training Communication/Marketing and Outreach Policies and Procedures/ Regulations This requirement is monitored through the Administrative Review CC Standards	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.  3. DBHS is determining the feasibility of incorporating a question in the customer satisfaction survey to confirm if interpretation services are provided at no cost and in a timely manner. If, possible the question will be added.

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2.8	The availability of printed materials in alternative format and how to access them.	Education and Training Communication/Marketing and Outreach Policies and Procedures/ Regulations	ADHS/DBHS T/RBHAs	<ol style="list-style-type: none"> <li>1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.</li> <li>2. This requirement is monitored annually during the Administrative Review.</li> </ol>
2.9	It is important to note that in all instances where ADHS is required by this contract to educate behavioral health recipients, brochures developed by outside entities must be supplemented with information materials developed by ADHS which are customized for the Medicaid population. ADHS shall make every effort to ensure that all information prepared for distribution to members is written using an easily understood language and format and as further described in the ACOM Member Information Policy, as applicable. Regardless of the format chosen by ADHS, the member information must be printed in a type, style and size, which can easily be read by members with varying degrees of visual impairment. ADHS must notify its members that alternative formats are available and how to access them.	Education and Training Communication/Marketing and Outreach Policies and Procedures/ Regulations This requirement is monitored through the Administrative Review MI Standards ADHS/DBHS has information provided on the agency website, brochures, signage	ADHS/DBHS T/RBHAs	<ol style="list-style-type: none"> <li>1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.</li> <li>2. This requirement is monitored annually during the Administrative Review.</li> <li>3. DBHS will develop a process for reviewing and approving the information materials.</li> </ol>

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2.10	At least annually, ADHS shall ensure all members are notified of their rights to request and obtain the following information. Name, locations, telephone numbers of, and non-English language spoken by current contracted providers in the member's service area, including identification of providers that are not accepting new referrals.	Communication/Marketing and Outreach Policies and Procedures/ Regulations This requirement is monitored through the Administrative Review MI Standards and the Network Plan/Inventory	ADHS/DBHS T/RBHAs	<ol style="list-style-type: none"> <li>1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.</li> <li>2. This requirement is monitored annually during the Administrative Review.</li> </ol>
2.11	Cultural Competency Plan Contact, sufficient to implement and oversee compliance with both the ADHS Cultural Competency Plan and the ACOM Cultural Competency Policy, and to oversee compliance with all AHCCCS requirements pertaining to limited English proficiency (LEP),	Training and Education Communication/Marketing and Outreach Policies and Procedures/ Regulations This requirement is monitored through the Cultural Competency Plan, Administrative Review CC Standards, the Network Plan/Inventory, and the Diversity Report.	ADHS/DBHS	<ol style="list-style-type: none"> <li>1. ADHS/DBHS has identified Marissa Castro as the interim Plan Contact.</li> <li>2. A team of individuals has been assigned to oversee the development and implementation of the plan.</li> </ol>
2.12	Cultural Competency Plan	Training and Education Communication/Marketing and Outreach Policies and Procedures/ Regulations This requirement is monitored through the Cultural Competency Plan, Administrative Review CC Standards, the Network Plan/Inventory, and the Diversity Report.	ADHS/DBHS T/RBHAs	<ol style="list-style-type: none"> <li>1. DBHS Plan revised to include CMS, AHCCCS, AHCCCS ACOM, and AHCCCS CAP requirements. DBHS has developed initiatives based on these requirements.</li> <li>2. T/RBHAs will develop plans with initiatives based on the requirements set forth in the DBHS plan.</li> <li>3. DBHS will develop a process for review and approval of the</li> </ol>

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				T/RBHA plans.
2.13	Provider network policies: 10 Ensuring that information is collected on the cultural needs of communities and that the provider network adequately addresses identified cultural needs	This requirement is monitored through the Network Plan/Inventory Report.	ADHS/DBHS T/RBHAs	<ol style="list-style-type: none"> <li>1. Requirement is in the T/RBHA contracts Scope of Work.</li> <li>2. DBHS program areas, specifically Network and QM/UM, will work collaboratively to ensure information is collected on the cultural needs of communities and develop a method for monitoring that provider networks adequately address identified cultural needs.</li> </ol>
2.14	ADHS shall establish a process to identify essential minimum network requirements for each GSA regarding the number of providers by provider type and specialty providers. In assessing the sufficiency of the provider network, ADHS must utilize multiple data sources including, but not limited to, appointment standard data, problem resolutions, reported member concerns, grievance and appeal data, Title XIX and Title XXI eligible data, penetration rates, member satisfaction surveys, demographic data, national data sources and information on the	This requirement is monitored through the Network Plan/Inventory Report.	ADHS/DBHS	<ol style="list-style-type: none"> <li>1. Requirement is in the T/RBHA contracts Scope of Work.</li> <li>2. DBHS program areas, specifically Network, will work collaboratively to ensure information is collected on the cultural needs of communities and develop a method for monitoring that provider networks adequately address identified cultural needs.</li> </ol>

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	cultural needs of communities.			
2.15	Cultural competency Members'/families' cultural preferences are assessed and included in the development of treatment plans.	This requirement is monitored through the QM/MM/UM unit the Network Plan/Inventory Report and the Office of Individual and Family Affairs.	ADHS/DBHS	<ol style="list-style-type: none"> <li>1. Requirement is in the T/RBHA contracts Scope of Work and member handbook.</li> <li>2. Review customer satisfaction survey.</li> <li>3. Use findings of the customer satisfaction survey to monitor and redirect T/RBHAs efforts.</li> </ol>
2.16	Information to behavioral health recipients must meet cultural competency and limited English proficiency requirements as specified in Section D, Paragraph 6, Member Information, and Paragraph 50, Cultural Competency	Training and Education Communication/Marketing and Outreach	ADHS/DBHS T/RBHAs	<ol style="list-style-type: none"> <li>1. Requirement is in the T/RBHA contracts Scope of Work.</li> </ol>
2.17	ADHS shall have a Cultural Competency Plan that meets the requirements of the AHCCCS Cultural Competency Policy. An annual assessment of the effectiveness of the plan, and any modifications to the plan, must be submitted to the Division of Health Care Management, Behavioral Health Unit, no later than 45 days after the start of each contract	Training and Education Communication/Marketing and Outreach Policies and Procedures/ Regulations This requirement is monitored through the Cultural Competency Plan, Administrative Review CC Standards, the Effectiveness Review Report, the Network Plan/Inventory, and the Diversity Report.	ADHS/DBHS	<ol style="list-style-type: none"> <li>1. Plan revised to include CMS, AHCCCS, AHCCCS ACOM, and AHCCCS CAP requirements. DBHS has developed initiatives based on these requirements.</li> </ol>

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	year. This plan should address all provider types and types of staff delivering behavioral health services.			
2.18	ADHS shall ensure compliance with the cultural competency plan and all requirements pertaining to Limited English Proficiency.	This requirement is monitored through the Cultural Competency Plan, Administrative Review CC Standards, and the Effectiveness Review Report.	ADHS/DBHS	<ol style="list-style-type: none"> <li>1. DBHS Plan revised to include CMS, AHCCCS, AHCCCS ACOM, and AHCCCS CAP requirements. DBHS has developed initiatives based on these requirements.</li> <li>2. T/RBHAs will develop plans with initiatives based on the requirements set forth in the DBHS plan.</li> <li>3. DBHS will develop a process for review and approval of the T/RBHA plans.</li> </ol>
2.19	Cultural competency information, including notification about Title VI of the Civil Rights Act of 1964. Providers should also be informed of how to access interpretation services to assist members who speak a language other than English or who use sign language.	Policies and Procedures/ Regulations This requirement is monitored through the Network Plan/Inventory.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work and member handbook.
2.20	In accordance with the AHCCCS Cultural Competency Policy, ADHS must submit a Cultural Competency Plan that includes an annual assessment of the effectiveness of the previous year's plan and any modifications to	This requirement is monitored through the Cultural Competency Plan, Administrative Review CC Standards, and the Effectiveness Review Report.	ADHS/DBHS	1. Plan revised to include CMS, AHCCCS, AHCCCS ACOM, and AHCCCS CAP requirements. DBHS has developed initiatives based on these requirements.

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	the plan to the Division of Health Care Management, Behavioral Health Unit, by no later than 45 days after the start of each contract year for review and approval			
2.21	The written information provided to behavioral health recipients describing the Grievance System including the grievance process, enrollee rights, grievance system requirements and timeframes, shall be in each prevalent non-English language occurring within the subcontractor's service area and in an easily understood language and format. ADHS shall inform behavioral health recipients that oral interpretation services are available in any language, that additional information is available in prevalent non-English languages upon request and how behavioral health recipients may obtain this information.	This requirement is monitored through the Grievance and Appeals unit and Grievance and Appeals reports.	ADHS/DBHS T/RBHAs	<ol style="list-style-type: none"> <li>1. Requirement is in the T/RBHA contracts Scope of Work, member handbook, and on the web.</li> <li>2. DBHS will create an inventory of documents translated into other languages.</li> <li>3. A representative from the Grievance and Appeals unit will be attending the Cultural Competency Advisory Committee Meetings to provide guidance.</li> </ol>
2.22	Written documents, including but not limited to the Notice of Action, the Notice of Appeal Resolution, Notice of Extension for Resolution, and Notice of Extension of Notice of Action shall be translated in the behavioral	This requirement is monitored through the Grievance and Appeals unit and Grievance and Appeals reports. Policies and Procedures/ Regulations This requirement is monitored through	ADHS/DBHS T/RBHAs	<ol style="list-style-type: none"> <li>1. Requirement is in the T/RBHA contracts Scope of Work and on the web.</li> <li>2. A representative from the Grievance and Appeals unit will be attending the Cultural Competency Advisory Committee</li> </ol>

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	<p>health recipient's language if information is received by the Contractor, orally or in writing, indicating that the enrollee has a limited English proficiency. Otherwise, these documents shall be translated in the prevalent non-English language(s) or shall contain information in the prevalent non-English language(s) advising the enrollee that the information is available in the prevalent non-English language(s) and in alternative formats along with an explanation of how enrollees may obtain this information. This information must be in large, bold print appearing in a prominent location on the first page of the document.</p>	<p>Administrative Review CC and MI Standards.</p>		<p>Meetings to provide guidance.</p>
2.23	<p>ADHS shall ensure outreach and dissemination of information to the general public, other human service providers, county and state governments, school administrators and teachers and other interested parties regarding behavioral health services available to Title XIX and Title XXI members.</p>	<p>Communication/Marketing and Outreach This requirement is monitored through the Administrative Review CC and MI Standards.</p>	ADHS/DBHS	<ol style="list-style-type: none"> <li>1. Requirement is in the T/RBHA contracts Scope of Work.</li> <li>2. DBHS will continue to develop an annual report intended to provide information on diverse populations receiving services in the Arizona public behavioral health system and to highlight the importance of culture and social influences in providing effective care.</li> </ol>

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2.24	Information must be printed in a type, style, and size which can be easily read by members with varying degrees of visual impairment or limited reading proficiency. ADHS and its subcontractors must notify its members that alternative formats are available and how to access them.	Policies and Procedures/ Regulations	ADHS/DBHS T/RBHAs	<ol style="list-style-type: none"> <li>1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.</li> <li>2. This requirement is monitored annually during the Administrative Review.</li> </ol>
2.25	ADHS shall comply with all applicable Federal and State laws and regulations including Title VI of the Civil Rights Act of 1964; Executive Order 13166; Title IX of the Education Amendments of 1972 (regarding education programs and activities); the Age Discrimination Act of 1975; and the Americans with Disabilities Act; EEO provisions; Copeland Anti-Kickback Act; Davis-Bacon Act; Contract Work Hours and Safety Standards; Rights to Inventions Made Under a Contract or Agreement; Clean Air Act and Federal Water Pollution Control Act; Byrd Anti-Lobbying Amendment, and the Rehabilitation Act of 1973.	Policies and Procedures/ Regulations	ADHS/DBHS T/RBHAs	<ol style="list-style-type: none"> <li>1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.</li> <li>2. This requirement is monitored annually during the Administrative Review.</li> </ol>

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2.26	ADHS shall comply with State Executive Order No. 99-4, which mandates that all persons, regardless of race, color, religion, sex, national origin or political affiliation, shall have equal access to employment opportunities, and all other applicable Federal and state laws, rules and regulations, including the Americans with Disabilities Act and Title VI. ADHS shall take positive action to ensure that applicants for employment, employees, and persons to whom it provides service are not discriminated against due to race, creed, color, religion, gender, national origin or disability.	Policies and Procedures/ Regulations This requirement is monitored through Administrative Review CC and MI Standards.	ADHS/DBHS	1. Requirement is in the contract Scope of Work.
2.27	People with disabilities may request special accommodations such as interpreters, alternative formats or assistance with physical accessibility. Requests for special accommodations must be made with at least three days prior notice by contacting AHCCCS Administration	Training and Education Policies and Procedures/ Regulations	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work and provider manual.  2. This requirement is monitored annually during the Administrative Review.
2.28	The Subcontractor shall comply with State Executive Order No. 99-4, which mandates that all persons, regardless of race, color,	Policies and Procedures/ Regulations	T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work and provider manual.

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	religion, gender, national origin or political affiliation, shall have equal access to employment opportunities, and all other applicable Federal and state laws, rules and regulations, including the Americans with Disabilities Act and Title VI. The Subcontractor shall take positive action to ensure that applicants for employment, employees, and persons to whom it provides service are not discriminated against due to race, creed, color, religion, gender, national origin or disability.			2. This requirement is monitored annually during the Administrative Review.
<b>3</b>	<b>AHCCCS ACOM REQUIREMENTS</b>			
3.1	All Contractors will be required to report their marketing costs on a quarterly basis as a separated line item in the quarterly financial statement. (Additional information pertaining marketing is available in the ACOM)	Communication/Marketing and Outreach - Please see monitoring activities.	ADHS/DBHS T/RBHAs	1. The Office of Finance will determine if this is a field that can be tracked and monitored.  2. A process will be developed to monitor and report marketing costs.
3.2	The Contractor must make oral interpretation services available to its members free of charge. Services for all non-English languages and the hearing impaired must be	Training and Education Communication/Marketing and Outreach Policies and Procedures/ Regulations This requirement is monitored through the	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the

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	available.	Administrative Review CC Standards.		Administrative Review.
3.3	The Contractor will be held accountable for the content of materials developed by the organizations listed in Attachment A. AHCCCS suggests that the Contractor review the materials to ensure that: 1) the services are covered under the AHCCCS program; 2) the information is accurate; and 3) the information is culturally sensitive.	Policies and Procedures/ Regulations This requirement is monitored through the Administrative Review MI Standards and desktop protocols.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.
3.4	All materials shall be translated when the Contractor is aware that a language is spoken by 3,000 or 10% (whichever is less) of the Contractor's members who also have limited English proficiency (LEP) in that language.	Education and Training Policies and Procedures/ Regulations This requirement is monitored through the Administrative Review CC and MI Standards.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.
3.5	All vital materials shall be translated when the Contractor is aware that a language is spoken by 1,000 or 5% (whichever is less) of the Contractor's members who also have LEP in that language. Vital materials must include, at a minimum, notices for denials, reductions,	Policies and Procedures/ Regulations This requirement is monitored through the desktop protocols and member information dissemination.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.

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	suspensions or terminations of services, consent forms, communications requiring a response from the member, informed consent and all grievance and request for hearing information included in the Enrollee Grievance System Policy as described in the "Enrollee Grievance System Standards and Policy" Contract.			
3.6	All written notices informing members of their right to interpretation and translation services in a language, shall be translated when the Contractor is aware that 1,000 or 5% (whichever is less) of the Contractor's members speak that language and have LEP.	Policies and Procedures/ Regulations This requirement is monitored through the Administrative Review CC Standards and desktop protocols.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.
3.7	The Contractors are not required to submit to AHCCCS Administration the member material it is the Contractor's sole responsibility to ensure the translation is accurate and culturally appropriate.	Policies and Procedures/ Regulations This requirement is monitored through the Administrative Review CC Standards and desktop protocols.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.
3.8	The Contractor shall make every effort to ensure that all information prepared for distribution is written in an easily understood language and format. The reading level and methodology used to measure it should be	Policies and Procedures/ Regulations This requirement is monitored through the Administrative Review CC and MI Standards.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.

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	included with the submission.			
3.9	The materials shall be available in alternative formats and in an appropriate manner that takes into consideration the special needs of those who, for example, are visually limited or have limited reading proficiency.	Policies and Procedures/ Regulations Communication/Marketing and Outreach This requirement is monitored through the Administrative Review CC and MI Standards.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.
3.10	The right to be treated fairly regardless of race, religion, gender, age or ability to pay.	Policies and Procedures/ Regulations This requirement is monitored through the Administrative Review MI Standards.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, policies and procedures manual, and member handbooks.  2. This requirement is monitored annually during the Administrative Review.
3.11	Instructions for obtaining culturally competent materials and/or services, including translated member material.	Policies and Procedures/ Regulations Communication/Marketing and Outreach This requirement is monitored through the Administrative Review CC and MI Standards.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.
3.12	The availability of printed materials in alternative formats and how to access such materials.	Policies and Procedures/ Regulations Communication/Marketing and Outreach This requirement is monitored through the	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.

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	Identified Requirement	DBHS and/or T/RBHA Initiative	Assigned Parties	Monitoring Activities
		Administrative Review CC and MI Standards.		2. This requirement is monitored annually during the Administrative Review.
3.13	The right to know about providers who speak languages other than English.	Policies and Procedures/ Regulations This requirement is monitored through the Administrative Review CC Standards.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.
3.14	The Contractor must include the following member related information on its website. Languages spoken by Practitioner	Policies and Procedures/ Regulations This requirement is monitored through the Administrative Review CC Standards.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.
3.15	Each Contractor must have a comprehensive cultural competency program, which is described in a written plan. The Cultural Competency Plan (CCP) must describe how care and services will be delivered in a culturally competent manner.	This requirement is monitored through the Cultural Competency Plan and the Administrative Review CC Standards.	ADHS/DBHS T/RBHAs	1. DBHS Plan revised to include CMS, AHCCCS, AHCCCS ACOM, and AHCCCS CAP requirements. DBHS has developed initiatives based on these requirements.  2. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  3. Identify and include in the CC plan best practices for cultural competency in behavioral health services.

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	Identified Requirement	DBHS and/or T/RBHA Initiative	Assigned Parties	Monitoring Activities
3.16	The Contractor must identify a staff member responsible for the CCP. If there is a change in the staff member responsible for the CCP, the Contractor must notify the Division of Health Care Management (DHCM).	This requirement is monitored through the Cultural Competency Plan.	ADHS/DBHS T/RBHAs	<ol style="list-style-type: none"> <li>1. ADHS/DBHS has identified Marissa Castro as the interim Plan Contact.</li> <li>2. A team of individuals has been assigned to oversee the development and implementation of the plan.</li> </ol>
3.17	The training program consists of the methods the Contractor will use to train its staff so that services are provided effectively to members of all cultures. Training must be customized to fit the needs of staff based on the nature of the contacts they have with providers and/or members.	Training and Education Policies and Procedures/ Regulations	ADHS/DBHS T/RBHAs	<ol style="list-style-type: none"> <li>1. Requirement is in the provider manual and policies and procedures manual.</li> <li>2. This requirement is monitored annually during the Administrative Review.</li> <li>3. T/RBHAs will identify the needs of the diverse providers and adjust training accordingly.</li> </ol>
3.18	The education program consists of methods the Contractor will use for providers and other subcontractors with direct member contact. The education program will be designed to make providers and subcontractors aware of the importance of providing services in a culturally competent manner. The contractor must also make additional efforts to train or assist providers and subcontractors in receiving training in how to provide culturally competent services.	Training and Education Policies and Procedures/ Regulations Communication/Marketing and Outreach	ADHS/DBHS T/RBHAs	<ol style="list-style-type: none"> <li>1. Requirement is in the provider manual and policies and procedures manual.</li> <li>2. This requirement is monitored annually during the Administrative Review.</li> <li>3. DBHS will collect data that demonstrates that contractors and sub-contractors are trained accordingly.</li> </ol>

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	Identified Requirement	DBHS and/or T/RBHA Initiative	Assigned Parties	Monitoring Activities
3.19	<p>The Contractor describes the method for evaluating the cultural diversity of its membership to assess needs and priorities in order to provide culturally competent care to its membership. Culturally competent care requires that the Contractor evaluate its network, outreach services and other programs to improve accessibility and quality of care for its membership. It must also describe the provision and coordination needed for linguistic and disability-related services. The availability and accessibility of translation services should not be predicated upon the non-availability of a friend or family member who is bilingual. Members may elect to use a friend or relative for this purpose, but they should not be encouraged to substitute a friend or relative for a translation service. A Contractor, at the point of contact, must make members aware that translation services are available. The services that are offered must be provided by someone who is proficient and skilled in translating language(s).</p>	<p>Policies and Procedures/ Regulations</p>	<p>ADHS/DBHS T/RBHAs</p>	<ol style="list-style-type: none"> <li>1. Requirement is in the provider manual and policies and procedures manual.</li> <li>2. This requirement is monitored annually during the Administrative Review.</li> <li>3. DBHS will continue to develop an annual report intended to provide information on diverse populations receiving services in the Arizona public behavioral health system and to highlight the importance of culture and social influences in providing effective care.</li> </ol>

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	Identified Requirement	DBHS and/or T/RBHA Initiative	Assigned Parties	Monitoring Activities
3.20	All materials shall be translated when the Contractor is aware that a language is spoken by 3,000 or 10% (whichever is less) of the Contractor's members who also have limited English proficiency (LEP) in that language	Training and Education Policies and Procedures/ Regulations This requirement is monitored through desktop protocols.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.
3.21	All vital materials shall be translated when the Contractor is aware that a language is spoken by 1,000 or 5% (whichever is less) of the Contractor's members who also have LEP in that language. Vital materials must include, at a minimum, notices for denial, reduction, suspension or termination of services, vital information from the member handbook and consent forms	Training and Education Policies and Procedures/ Regulations This requirement is monitored through desktop protocols.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.
3.22	All written notices informing members of their right to interpretation and translation services in a language shall be translated when the Contractor is aware that 1,000 or 5% (whichever is less) of the Contractor's members speak that language and have LEP.	Training and Education Policies and Procedures/ Regulations This requirement is monitored through desktop protocols.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the Administrative Review.
3.23	The Contractor must evaluate the CCP for effectiveness. Evaluations are to be made on an annual basis and a copy of the evaluation sent to DHCM. The evaluation may, for	This requirement is monitored through the Cultural Competency Plan.	ADHS/DBHS T/RBHAs	1. Requirement is in the T/RBHA contracts Scope of Work, provider manual, and policies and procedures manual.  2. This requirement is monitored annually during the

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	example, focus on comparative member satisfaction surveys, outcomes for certain cultural groups, member complaints, grievances, provider feedback and/or Contractor employee surveys. If issues are identified, they should be tracked and trended, and actions should be taken to resolve the issue(s).			Administrative Review.
<b>4</b>	<b>AHCCCS CAP REQUIREMENTS</b>			
4.1	Root Cause Analysis – how objectives are determined.	This requirement is monitored through the Cultural Competency Plan.	ADHS/DBHS	<ol style="list-style-type: none"> <li>1. Conduct an analysis/ needs assessment to identify priorities and to establish goals and objectives for the 2009-2010 CC Plan.</li> <li>2. DBHS developed an annual report intended to provide information on diverse populations receiving services in the Arizona public behavioral health system and to highlight the importance of culture and social influences in providing effective care.</li> <li>3. The report will be developed annually. Once the report is finalized it will be posted to the ADHS/DBHS and T/RBHAs websites.</li> </ol>

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	Identified Requirement	DBHS and/or T/RBHA Initiative	Assigned Parties	Monitoring Activities
				<p>4. The report will be used as guidance to develop the baseline initiatives for the following year's Cultural Competency Plan.</p> <p>5. Work collaboratively with DBHS marketing and Network Development in developing the plan.</p>
4.2	Member Survey – provide additional information regarding how the results will be integrated into the Cultural Competency Work Plan.	This requirement is monitored through the QM/MM/UM Plan and the Cultural Competency Plan.	ADHS/DBHS	<p>1. ADHS/DBHS plans to utilize the consultation services of an expert in the field of Cultural Competency to address integrating the results of the survey into the Cultural Competency Plan/Work plan.</p> <p>2. Conduct focus groups in each GSA to identify consumer's main concerns pertaining to the integration of their culture in the provision of services.</p> <p>3. Identify activities that will improve issues identified by consumers.</p> <p>4. Use data for monitoring purposes.</p> <p>5. Verify if the Cultural Competency questions utilized in the member satisfaction survey are aligned with the plan and activities.</p>

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	Identified Requirement	DBHS and/or T/RBHA Initiative	Assigned Parties	Monitoring Activities
4.3	Individual Person Cultural Competency Assessment – How will the assessment be revised and what new elements will be included.	Data Collection and Report Production Implementation and Analysis of Organizational Self-Assessment at all Levels	ADHS/DBHS	<ol style="list-style-type: none"> <li>1. Identify the fields that are not applicable to behavioral health.</li> <li>2. Adjust the assessment accordingly.</li> </ol>
4.4	Fostering an inclusive culture within the division and promoting sensitivity and awareness of diversity at all levels.	Training and Education Collaborative Partnerships with Community Based Organizations Implementation and Analysis of Organizational Self-Assessment at all Levels Communication/Marketing and Outreach Data Collection and Report Production Policies and Procedures/ Regulations	ADHS/DBHS	<ol style="list-style-type: none"> <li>1. The self assessment survey will be conducted during regular staff meetings.</li> <li>2. Results will be shared with staff and will be used to develop initiatives.</li> <li>3. ADHS/DBHS plans to utilize the consultation services of an expert in the field of Cultural Competency to address integrating the results of the survey into the Cultural Competency Plan/Work plan.</li> </ol>
4.5	Increase awareness of the behavioral health issues and impact of diversity to the community by the development of a DBHS Diversity, Web page and or Behavioral Health Diversity Fact Sheet.	Communication/Marketing and Outreach Data Collection and Report Production	ADHS/DBHS T/RBHAs	<ol style="list-style-type: none"> <li>1. The Fact Sheet is available on the web.</li> <li>2. Additional web site documents were translated to enhance the availability of information in Spanish.</li> <li>3. ADHS/DBHS has reviewed population trends on an annual basis; however, effective 2009, they intend to review on a quarterly basis.</li> <li>4. DBHS will identify a template and reporting requirements.</li> </ol>

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	Identified Requirement	DBHS and/or T/RBHA Initiative	Assigned Parties	Monitoring Activities
				<p>5. Reports will be used to monitor population trends.</p> <p>6. T/RBHAs will report changes in population trends to DBHS.</p> <p>7. T/RBHAs will adjust activities by the population trends.</p>
4.6	Explore various trainings that can be used statewide to increase awareness of other cultures such as: Deaf and Hard of Hearing, GLBTQ, Native American, Asian and Pacific Islanders, Hispanic/Latino, African American, Blind and visually impaired.	Training and Education Collaborative Partnerships with Community Based Organizations	ADHS/DBHS	<p>1. RBHAs are already providing education regarding the Elderly as part of their Cultural Diversity Training.</p> <p>2. ADHS/DBHS will consider requiring all RBHAs to provide similar training.</p> <p>3. Data will be collected that supports that training was provided i.e. number of participants, training evaluation results, etc.</p>
4.7	Review and revise policy on cultural competency to be more inclusive and broader in approach to diverse cultures.	Policies and Procedures/ Regulations	ADHS/DBHS	<p>1. ADHS/DBHS defines broader in the context of encompassing other cultures such as the deaf and hard of hearing and increasing overall knowledge as it relates to diversity.</p> <p>2. ADHS will measure this by looking at the percent of staff that complete the training.</p>

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	Identified Requirement	DBHS and/or T/RBHA Initiative	Assigned Parties	Monitoring Activities
				<p>3. ADHS/DBHS intends to conduct pre and post testing as a way to measure effectiveness of trainings.</p> <p>4. DBHS intends to work with the Arizona School for Deaf and Blind to identify needs of this population.</p>
4.8	DBHS will explore the development of data elements to reflect the deaf and hard of hearing and visually impaired for Diversity Outcome Report.	Data Collection and Report Production	ADHS/DBHS	<p>1. ADHS/DBHS utilizes a demographic form to capture this information.</p> <p>2. A report titled, "Diversity Outcome Report" is scheduled for completion in November.</p> <p>3. DBHS will identify data elements, monitor data collection, and conduct data analysis.</p>
4.9	Development of Data Elements to Reflect the Deaf and the Hard of Hearing, and Visually Impaired DBHS has incorporated the categories of Deaf and Hard of Hearing and Visually Impaired into Axis III conditions.	Data Collection and Report Production	ADHS/DBHS	<p>1. This information is captured on the assessment as an Axis III condition.</p> <p>2. DBHS intends to use Demographic data to capture this information.</p> <p>3. DBHS will Monitor data collection and conduct data analysis.</p>

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	Identified Requirement	DBHS and/or T/RBHA Initiative	Assigned Parties	Monitoring Activities
4.10	Identification of Current Marketing Efforts of T/RBHAS.	Communication/Marketing and Outreach	ADHS/DBHS	<ol style="list-style-type: none"> <li>1. Last year was the first year the measurement of interventions was to be included in the work plans and it was voluntary for the RBHAs.</li> <li>2. This year, the evaluation component is a requirement that ADHS/DBHS will monitor.</li> <li>3. DBHS will establish reporting requirements and timelines, establish policy and procedures, implement monitoring processes, and ensure that T/RBHAS submit this deliverable on time.</li> </ol>
4.11	Reporting Form for Quarterly RBHA Reports - The Reporting Form does appear to contain useful elements; however, AHCCCS recommends that additional fields be added that promote a more analytical components.	Data Collection and Report Production – Quarterly Diversity Report on Enrollment and Penetration	ADHS/DBHS	<ol style="list-style-type: none"> <li>1. Last year was the first year the measurement of interventions was to be included in the work plans and it was voluntary for the RBHAs.</li> <li>2. This year, the evaluation component is a requirement that ADHS/DBHS will monitor.</li> <li>3. DBHS will ensure T/RBHAS meet this standard. DBHS will review reporting requirements and add fields as suggested by AHCCCS.</li> <li>4. Data will be used for monitoring purposes.</li> </ol>

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	Identified Requirement	DBHS and/or T/RBHA Initiative	Assigned Parties	Monitoring Activities
4.12	Most needed services identified by the survey are Outpatient Treatment, Counseling, and Peer Support, for members who are Deaf and Hard of Hearing.	Data Collection and Report Production This requirement is monitored through the QM/MM/UM Plan and the Cultural Competency Plan.	ADHS/DBHS	<ol style="list-style-type: none"> <li>1. Information was distributed to the Network and Development team.</li> <li>2. The Cultural Competency Team will work in collaboration with the Network and Development team to ensure compliance and provide technical assistance as needed to ensure that this is addressed in the upcoming Network and Development Plan.</li> </ol>