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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 healthcare 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 VITAC to complement our capabilities. CLI provides 24/7 support for written and verbal interpreter services in over 230+ languages. VITAC 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™ 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, URAC standards, and **PRI**TM's application of its policies, procedures, and resources which validate these requirements.



PRITM'S CULTURAL COMPETENCY PLAN

Principal Standard

CLAS Standard 1

Provide effective, equitable, understandable, and respectful quality care and services that are responsive to diverse cultural health beliefs and practices, preferred languages, health literacy, and other communication needs.

PRITM's Plan

PRITM'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 PRITM'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 IR-CORE 1-15 Consumer Safety Mechanism

Governance, Leadership, and Workforce

CLAS Standard 2

Advance and sustain organizational governance and leadership that promotes CLAS and health equity through policy, practices, and allocated resources.

PRITM's Plan

PRITM's Recruitment Approach Plan demonstrates our adherence to this standard and the diverse recruiting techniques utilized in furtherance of our Affirmative Action Plan (AAP), which may be subject to annual DOL audit. *

*URAC Standards IR-CORE 1-2, Regulatory Compliance



CLAS Standard 3

Recruit, promote, and support a culturally and linguistically diverse governance, leadership, and workforce that are responsive to the population in the service area.

PRITM's Plan

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

PRITM has a diverse workforce as demonstrated by the over 40 different job descriptions currently at **PRITM** representing the various opportunities provided to our workforce. Staff qualifications are matched to job descriptions to ensure job requirements are met. **PRITM** 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 IR-CORE 1-9 Job Descriptions, IR-CORE 1-10 Staff Qualifications, IR-RCQ 1-1 Credentialing

CLAS Standard 4

Educate and train governance, leadership, and workforce in culturally and linguistically appropriate policies and practices on an ongoing basis.

PRITM's Plan

PRITM maintains training is paramount to ensure a culture of compliance. **PRITM** 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 required.

Our corporate culture, based on **PRITM**'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 **PRITM**'s values. *

*URAC Standard IR-CORE 1-11 Staff Training Program



Communication and Language Assistance

CLAS Standard 5

Offer language assistance to individuals who have limited English proficiency and/or other communication needs, at no cost to them, to facilitate timely access to all health care and services.

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 230+ 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 IR-RP 1-9 Decision Notice

CLAS Standard 6

Inform all individuals of the availability of language assistance services clearly and in their preferred language, verbally and in writing.

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 230+ 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 IR-RP 19 Decision Notice, IR-RCQ 1-2 Reviewer Credentials Verification



CLAS Standard 7

Ensure the competence of individuals providing language assistance, recognizing that the use of untrained individuals and/or minors as interpreters should be avoided.

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 230+ 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 - IR-RP 19 Decision Notice, IR-RCQ 1-2 Reviewer Credentials Verification

CLAS Standard 8

Provide easy-to-understand print and multimedia materials and signage in the languages commonly used by the populations 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 -IR-RP 1-9 Decision Notice



Engagement, Continuous Improvement, and Accountability

CLAS Standard 9

Establish culturally and linguistically appropriate goals, policies, and management accountability, and infuse them throughout the organization's planning and operations.

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 IR-CORE 1-1 Policy and Procedure Maintenance, Review, and Approval, IR-TMR 1-2 Performance Monitoring

CLAS Standard 10

Conduct ongoing assessments of the organization's CLAS-related activities and integrate CLAS-related measures into measurement and continuous quality improvement activities.

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 IR-TMR 1-2 Performance Monitoring

CLAS Standard 11

Collect and maintain accurate and reliable demographic data to monitor and evaluate the impact of CLAS on health equity and outcomes and to inform service delivery.

PRI™'s Plan

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

*URAC Standards IR-CORE 1-7 Information Confidentiality and Security



CLAS Standard 12

Conduct regular assessments of community health assets and needs and use the results to plan and implement services that respond to the cultural and linguistic diversity of populations in the service area.

***PRI*TM's Plan**

*PRI*TM 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 13

Partner with the community to design, implement, and evaluate policies, practices, and services to ensure cultural and linguistic appropriateness.

***PRI*TM's Plan**

Due to the nature of *PRI*TM'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. *

*URAC Standard IR-CORE 1-1 Policy Maintenance, Review and Approval



CLAS Standard 14

Create conflict and grievance resolution processes that are culturally and linguistically appropriate to identify, prevent, and resolve conflicts or complaints.

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 15

Communicate the organization's progress in implementing and sustaining CLAS to all stakeholders, constituents, and the general public.

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.