

WHITE MOUNTAIN APACHE TRBHA
Cultural Competency Plan
Fiscal Year 2009-2010

GOAL1: TO IMPROVE COMPLIANCE AND ENFORCEMENT OF CMS REQUIREMENTS AND IMPLEMENTATION OF CLAS STANDARDS					
OBJECTIVE1: TO CONTINUE TO IMPLEMENT THE 4 FEDERALLY MANDATED CLAS STANDARDS AND THE ADDITIONAL ADHS/DBHS REQUIRED CLAS STANDARDS					
	Steps	Assigned Parties	Completion Date and Product/ Measure Evaluation by DBHS	Status/progress update – what was done and when, what remains to be done and by when will it be completed?	Additions, /Modifications/ Completions/Deletions
1.1	Education and Training All internal staff will be trained annually and upon hire utilizing the DBHS developed Cultural Diversity Training. Apache Cultural Expert Cline Griggs will provide annual training for ABHS staff and contracted Providers staff. Cline will also provide additional trainings to accommodate new hires.	HR/Training Coordinator ABHS Staff Provider Network Coordinator Provider staff	Annually and New Hires Training Sign-in sheets Web Training Certificate Annually – Certificates This requirement is monitored annually by DBHS during the Administrative Review.		
1.1a	Communication/Marketing and Outreach. Staff participate on a rotating basis in the weekly KNNB radio show at 10:00 am on Tuesday mornings. The program is conducted in both Apache and English offering information about Mental Health, Substance Abuse, Prevention, how to access services and other topics.	Apache Behavioral Health Services (ABHS) staff from both the Cibecue and Whiteriver Outpatient Clinics	As events occur This requirement is monitored annually by DBHS during the Administrative Review.		
1.1.b	Marketing and Outreach Participation in local venues (i.e. health fairs, community events, school parent nights, career days, Tribal Fair, etc.)	ABHS Staff from Adult and Children’s Teams, Prevention, Intake and Member Services	At end of event staff will provide QM event activity reporting form.		
1.2	Communication: ABHS staff are certified as proficient in the Apache Language to meet CLAS standards for LEP	The White Mountain Apache Cultural Liaison.	October 2009 ongoing as new staff are hired.		
1.2.a	Language proficiency other than English, Apache is the dominant Language in the GSA; English is the second language, so ABHS has strict hiring practices to ensure key positions are filled by Apache speakers. WMA Tribal hiring Preference: “Indian preference for registered members of the White Mountain Apache Tribe or any registered member of a federally recognized Tribe or Nation, after meeting all other qualifications.”	ABHS staff key positions (i.e. Reception, Intake, Case Managers, Provider Network Coordinator, HR/Training Coordinator and CFO)	Certification of Proficiency in the Apache Language is filed in the staff personnel file.		

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1.2.b	Communication: Printed materials in languages other than English. (Apache is not a written language) Apache speakers translate basic materials into Apache creating recordings that are loaded into the touch screen programs located in the ABHS clinic lobbies and the IHS ER, and recorded onto CD's to be distributed to contracted providers in the event they serve an Apache speaking client All clinicians have a case manager assigned to them that speaks Apache to ensure Apache speaking clients understand diagnosis, medication, requirements of specific programs and services.	White Mountain Apache TRBHA Cultural Competency Committee works with community members identified by the Tribal Cultural Liaison as proficient Apache Speakers. Clinicians and Case Managers IT Administrator	Documentation that CD's have been distributed to contracted providers. Spot checks on Touch screen programs to document number of people utilizing the program. At least twice per quarter. DBHS Administrative Review		
1.2.c	ABHS Receptionist and back-up staff are certified Apache Speakers. The receptionist informs potential and enrolled clients, and family members that services can be provided in Apache at no cost and ensures callers and walk ins are aware of the intake process and the documents they need to bring to appointments.	Receptionist Posters are posted in waiting rooms in the hallway and other accessible areas informing clients of the Complaint Process, Client Rights and How to Access Language Services.	Copies of Posters DBHS Administrative Review		
	The ABHS Intake Specialist reads all materials to Apache speakers to ensure they understand the BH System, Rights Of Clients, Complaint System, Grievance And Appeal Process Notice of Action, the Notice of Appeal Resolution, Notice of Extension for Resolution, and Notice of Extension of Notice of Action, AHCCCS screening process, Advance Directives, HIPAA and other vital information.	Intake Specialist	Privacy Form has a checklist the client initials and signs indicating they received and understand the information. Internal Chart Audit (MI.6 tool) DBHS Bii-annual Chart Audit DBHS Administrative Review		

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1.3	Materials are provided in the languages spoken in the GSA. The website www.wmabhs.org has items a listing of training and materials available for providers, as well as a web based training program, which includes cultural diversity training and WMAT specific training.	Proficient Apache Speakers. IT Administrator Provider Network Coordinator White Mountain Apache TRBHA Cultural Competency Committee	CC Committee Members review website prior to meetings to ensure information is up to date DBHS Administrative Review		
1.3.a	Provider Network Coordinator conducts annual site visits to provide orientation to occupied contracted providers. A checklist is distributed to providers to ensure their staff receive training and have access to culturally appropriate materials via distributed CD's and the WMATRBA website and other appropriate websites.	Provider Network Coordinator	Provider Orientation and Monitoring Checklists DBHS Administrative Review		
1.4	The Out of Home case managers working with clients being served by contracted providers are Apache speakers and will work with the family to obtain Traditional services and/or ensure clients and their families have opportunities to attend cultural events, and arrange transportation, and other services and support to ensure cultural needs are being met.	Provider Network Coordinator Out of Home Case Managers	Ongoing Internal Chart Review DBHS Bi-annual Chart Review DBHS Administrative Review		

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GOAL 2: TO IMPROVE COMPLIANCE AND ENFORCEMENT OF AHCCCS/ADHS/DBHS CONTRACT REQUIREMENTS					
OBJECTIVE 1: THE CULTURAL DIVERSITY OF THE WHITE MOUNTAIN APACHE TRBHA IS ASSESSED ANNUALLY TO ENSURE CULTURALLY APPROPRIATE SERVICES ARE DEVELOPED AND DELIVERED.					
	STEPS	Assigned Parties	Completion Date and Product/ Measure Evaluation by DBHS	Status/progress update – what was done and when, what remains to be done and by when will it be completed?	Additions, /Modifications/ Completions/Deletions
1.1	WMATRBHA QM Administrator reviews census data, local survey results, information gathered from ABHS staff involvement in community groups, information gathered from the WMAT Cultural Expert and the WMAT Cultural Liaison as well as internal chart review and the Annual Consumer Survey to analyze the cultural diversity of the GSA. The analysis is presented to the WMATRBHA Cultural Competency, QM, Network Monitoring and Management Committees to be utilized in making decisions related to development of culturally competent programs and services.	QM Administrator ABHS Staff WMATRBHA Committees	Annual Consumer Survey Committee Meeting Minutes The Cultural Competency Plan		
1.2	WMATRBHA Cultural Competency Committee works on analyzing data from the DBHS reports of eligible TXIX and TXXI residing in the WMATRBHA GSA and comparing enrollment data to present reports to the WMATRBHA Cultural Competency, QM, Network Monitoring and Management Committees to determine development of marketing and outreach planning.	CC Committee Members QM Administrator WMATRBHA Committees	Penetration and Diversity Report submitted to DBHS Committee Meeting Minutes The Cultural Competency Plan		
1.3	WMATRBHA staff participate in community committees to learn about cultural needs with the communities and to disseminate information about available services to the community members. Staff report information at their weekly program meetings (i.e. Child Adolescent and Family Team, Adult Team, Out of Home Network Team and Management Team) minutes from the meetings are monitored and maintained by the QM administrator and become part of the data set that is analyzed to determine development planning.	ABHS Staff Team Members QM Administrator	Meeting minutes		

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GOAL 2: TO IMPROVE COMPLIANCE AND ENFORCEMENT OF AHCCCS/ADHS/DBHS CONTRACT REQUIREMENTS					
OBJECTIVE 2: THE TRBHA WILL DEVELOP A CULTURAL COMPETENCY PLAN BASED ON THE ADHS/DBHS CULTURAL COMPETENCY PLAN. THE PLAN WILL BE REVIEWED QUARTERLY AND EVALUATED ANNUALLY. REVIEW UPDATES AND EVALUATION RESULTS WILL BE SENT TO DBHS					
	STEPS	Assigned Parties	Completion Date and Product/ Measure Evaluation by DBHS	Status/progress update – what was done and when, what remains to be done and by when will it be completed?	Additions, /Modifications/ Completions/Deletions
2.1	Development of Cultural Competency Plan that meets the requirements of the DBHS Cultural Competency Policy and addresses both internal and contracted providers' responsibilities to adhere to the plan. The plan will be submitted to the WMATRBHA management committee for review prior to submission to DBHS	WMATRBHA Cultural Competency Committee	November 19, 2009 November 11, 2009		
2.2	Management staff from the CC Committee will participate in the DBHS Cultural Competency Advisory Committee meetings to ensure any additions or changes are entered into the plan and to provide updates on action steps implemented and to network with other T/RBHAs.	Dorris Hinton, Ericka Gloshey, Jacqui Naue	As scheduled by DBHS		
2.3	Provider Network Coordinator, Dorris Hinton, is the Cultural Liaison for the WMATRBHA and is the Chair of the WMATRBHA Cultural Competency Committee. Management Staff that are members of the CC committee are responsible for implementing specific components of the plan and participate in the development and evaluation of the Plan.	Dorris Hinton, Ericka Gloshey, Jacqui Naue WMATRBHA Cultural Competency Committee	Ongoing		
2.4	An annual assessment of the effectiveness of the previous year's plan and any modifications to the plan will be submitted to DBHS as required for review and approval. Progress reports and an annual report will be provided to Management staff on a quarterly basis and at any time there are unique findings or outcomes.	WMATRBHA Cultural Competency Committee Management Committee	As scheduled by DBHS Quarterly		

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OBJECTIVE 3: THE CULTURAL COMPETENCY PLAN DESCRIBES HOW CARE AND SERVICES WILL BE DELIVERED IN A CULTURALLY COMPETENT MANNER.					
	STEPS	Assigned Parties	Completion Date and Product/ Measure Evaluation by DBHS	Status/progress update – what was done and when, what remains to be done and by when will it be completed?	Additions, /Modifications/ Completions/Deletions
3.1	Members'/families' cultural preferences are assessed and included in the development of treatment plans. At intake the intake specialist explains to the CFT and Adult Team Concept and encourages the client to bring whoever is important in their life to their Assessment appointment. The assessor works with the client to determine who needs to be involved in the TX planning and inquires about cultural preferences. NOTE: In the White Mountain Apache Culture it is not the norm to share your cultural beliefs with someone you have just met. The most common answer on question #8. of the assessment is "don't know" or church is listed. There is historical trauma connected to practicing traditional/cultural ways and there continues to be stigma attached to practicing traditional ways in this community. Over time as a level of trust is developed in the therapeutic relationship clients and families may open up a little more about their cultural preferences, but not always.	Intake Specialist, Clinician QM Administrator	45 days from intake, assessment and TX plan must be completed. Quarterly internal chart review monitors this measure, and implements corrective actions as required. DBHS Annual Administrative Review. DBHS Bi-annual Chart Audits		
3.1.a	WMATRBA participates in the DBHS Annual Consumer Survey and utilizes data gathered to ensure clients and families are involved in the TX Planning process. Data from Internal Chart Reviews and the Consumer Survey are reported to the QM Committee and any needed corrective actions are developed. Training for staff and raising awareness among clients is utilized to improve this measure. NOTE: The cultural norm in the White Mountain Apache Community is to first seek help among family to solve problems, by the time people present to ABHS for TX they often do not want to involve family.	QM Administrator QM Committee	DBHS Annual Consumer Survey		

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GOAL 2: TO IMPROVE COMPLIANCE AND ENFORCEMENT OF AHCCCS/ADHS/DBHS CONTRACT REQUIREMENTS					
OBJECTIVE 4: ENSURE CLIENTS RECEIVE LANGUAGE/TRANSLATION SERVICES FREE OF CHARGE AND THAT CULTURALLY APPROPRIATE MATERIALS ARE MADE AVAILABLE TO CLIENTS AND FAMILIES.					
	Steps	Assigned Parties	Completion Date and Product/ Measure Evaluation by DBHS	Status/progress update – what was done and when, what remains to be done and by when will it be completed?	Additions, /Modifications/ Completions/Deletions
4.1	The White Mountain Apache Cultural Liaison certifies ABHS staff as proficient Apache Speakers.	Key positions are staffed with Apache Speakers(i.e. Reception, Intake, Case Managers, Provider Network Coordinator, HR/Training Coordinator and CFO)	October 2009 ongoing as new staff hired. DBHS Annual Administrative Review		
4.1.a	Proficient Apache speakers translate basic materials into Apache creating recordings that are loaded into the touch screen programs located in the ABHS clinic lobbies in Whiteriver and Cibecue and the IHS ER.	Certified Apache Speakers IT Administrator	August and September 2009 DBHS Annual Administrative Review		
4.1.b	Basic materials are recorded onto CD's and culturally appropriate materials are distributed (upon completion of contract) to contracted providers to serve Apache speaking clients/families.	Certified Apache Speakers IT Administrator Provider Network Coordinator	August /September 2009 DBHS Annual Administrative Review		
4.1.c	The website www.wmabhs.org has a listing of websites where providers/clients and family members can obtain culturally appropriate materials.	IT Administrator Provider Network Coordinator	Materials added as they become available		
4.2	Intake document "Privacy Form" has questions to find out if a client needs an interpreter for Apache or Sign Language and informs them the services will be provided free of charge.	Intake Specialist, Customer Service Manager	October 2008 Internal Chart Audit DBHS Bi-Annual Review		
4.3	All clinicians have a case manager assigned to them that speaks Apache to ensure Apache speaking clients understand diagnosis, medication, requirements of specific programs and services, and any other information or materials that require explanation in easily understood language.	Clinicians and Case Managers	Interpreter services are not recorded since services are provided in the client's language		

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OBJECTIVE 5: TO ENSURE CLIENTS ARE MADE AWARE OF THEIR RIGHTS AT LEAST ANNUALLY; ALL INFORMATION IS UPDATED AND MATERIALS ARE AVAILABLE IN ALTERNATIVE FORMATS IN AN EASILY UNDERSTOOD LANGUAGE.					
	STEPS	Assigned Parties	Completion Date and Product/ Measure Evaluation by DBHS	Status/progress update – what was done and when, what remains to be done and by when will it be completed?	Additions, /Modifications/ Completions/Deletions
5.1	<p>Clients are informed to notify their case manager/clinician or Customer Services anytime there is a change in their contact and/or financial information. Clients are required to update their intake information at least annually and receive updated materials pertaining to their rights and responsibilities as enrolled members of the White Mountain Apache TRBHA including information on Title VI of the Civil Rights Act of 1964.</p> <p>Clinicians/case managers are required to keep track of their client's enrollment dates and ensure the client updates the intake annually.</p> <p>Clinicians/ case managers also receive training to ask clients if their have been changes and to encourage them to report any dissatisfaction with the service they receive.</p>	<p>Clients, Clinicians/Case Managers, Intake Specialist QM Administrator</p>	<p>QM conducts internal quarterly audits utilizing the MI6.1 Audit tool to ensure adherence to the ADHS/DBHS/AHCCCS requirements and performance measures.</p> <p>DBHS Annual Administrative Review</p>		
5.2	<p>Members of the WMA Cultural Competency Committee review materials to ensure they are written at a level that is easily understood and printed in a type, style and size, which can easily be read by clients with varying degrees of visual impairment. The CC Committee also searches for materials that at least represent American Indians even if Apache specific materials are not available. The materials are made available to contracted providers. Clients receive information informing them materials are available in alternative formats and how to access the materials.</p> <p>All basic materials are translated in a spoken format and certified Apache speakers are available at all times of business operation.</p>	<p>White Mountain Apache TRBHA Cultural Competency Committee, Community Members</p> <p>WMAT Cultural Liaison</p> <p>ABHS Clinic Receptionist</p>	<p>Meetings are held Quarterly</p> <p>Updated as changes are implemented by DBHS</p> <p>DBHS Annual Administrative Review</p>		
5.3	<p>The Provider Network Coordinator ensures contracted providers receive updated information and provide clients with updated materials</p>	<p>Provider Network Coordinator</p>	<p>Annual monitoring visits. Checklists</p>		

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OBJECTIVE 6: WMATRBHA WILL MAINTAIN A NETWORK SUFFICIENT TO MEET THE NEEDS OF THE GSA BY PROVIDER TYPE AND SPECIALTY PROVIDERS. WMATRBHA WILL ASSESS THE SUFFICIENCY OF THE PROVIDER NETWORK, UTILIZING MULTIPLE DATA SOURCES.

	STEPS	Assigned Parties	Completion Date and Product/ Measure Evaluation by DBHS	Status/progress update – what was done and when, what remains to be done and by when will it be completed?	Additions, /Modifications/ Completions/Deletions
6.1	WMATRBHA will conduct quarterly reviews of the penetration rate for TXIX and TXXI eligible individuals on the Fort Apache Reservation to ensure ABHS Whiteriver and Cibecue outpatient clinic capacity and the network of contracted providers are sufficient to meet the needs of enrolled and eligible clients. Quarterly Network reporting to DBHS. Active Participation in DBHS Network Development meetings.	QM Administrator, Network Coordinator, QM Committee, Network Monitoring Committee	Quarterly reports to QM and NM committees. Quarterly Network Reports to DBHS Annual Sufficiency Assurance to DBHS Annual DBHS Administrative Review		
6.2	WMATRBHA submits monthly referral reports to DBHS on the Sherman Server. IT maintains logs of appointment wait times and transportation wait times, which are reviewed at least quarterly to ensure clients do not wait over 45 minutes.	Intake Specialist QM Administrator IT Administrator	Monthly referral reports to DBHS Annual DBHS Administrative Review		
6.3	WMATRBHA QM, Grievance, Risk Management and Network Monitoring Committees review data from complaints, provider monitoring reports, internal chart audit, member satisfaction surveys, census data and general demographics to determine what development is needed in the network and to ensure current facilities meet the cultural needs of the clients and their families	QM, Grievance, Risk Management and Network Monitoring Committees	Quarterly Network Reports to DBHS Annual Sufficiency Assurance to DBHS Annual DBHS Administrative Review		
6.4	Weekly Out of Home meetings are held to address any concerns with contracted providers and to discuss any additional needs clients/families may have.	Out of Home Case Managers, Provider Network Coordinator and the Clinical Director	Meeting minutes, out of home placement weekly report DBHS Annual Admin Review		

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