



Cultural Competency Plan

2022

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I. Introduction

Aflac Benefits Solutions, Inc. (ABS), is owned and operated by professionals with experience in the insurance and healthcare industries. ABS, formerly known as Argus Dental & Vision, Inc., is an organization founded by a Florida dentist to provide dental and vision benefits that offer value and quality to members. The total executive and management experience combines over one hundred years of knowledge with an excellent historical record of successful benefits implementation for millions of members. Our mission is to deliver a superior product through a strong provider network. The success of this mission focuses on providing consistent quality care that works in conjunction with efforts to also promote cultural sensitivity and awareness in the delivery of our services.

ABS has implemented a **Cultural Competency Plan** (CCP) to address issues of disparities and bias that can affect the quality of healthcare. ABS is keenly aware that we provide services to a population that is continuously evolving into a highly diverse and multicultural population. Our goal is to provide services to members in a manner sensitive to the cultural background, religious beliefs, values, and traditions. A copy of this Cultural Competency Plan is made available to our members and network providers upon request and at no cost and is shared via our public website in a downloadable PDF format. Furthermore, ABS strives to provide all information in a culturally competent manner that assists all individuals in obtaining healthcare services. This includes those with limited English proficiency or reading skills, diverse cultural and ethnic backgrounds, or physical-mental disability issues.

The role and objectives of the **Cultural Competency Plan** are to meet all standards to assure that members receive services in a manner that is responsive to their cultural and linguistic needs while monitoring for disparities occurring in our network. ABS carries out continuous efforts to monitor and evaluate the effectiveness of the CCP and will implement interventions to meet our standards and objectives. This requires that our organization and our people embark on a learning journey that provides the knowledge, skills, and abilities to effectively work cross-culturally.

II. Overall Program Objectives

ABS' **Cultural Competency Plan** primarily focuses its objectives on the National Standards for Culturally and Linguistically Appropriate Services in Health and Health Care (The National CLAS Standards). The National CLAS Standards aim to improve health care quality and advance health equity by establishing a framework for organizations to serve the nation's increasingly diverse communities. The CLAS Standards were developed by the United States Department of Health and Human Services' Office of Minority Health and provide fifteen (15) standards. These Standards "are intended to advance health equity, improve

quality and help eliminate health care disparities by establishing a blueprint for health and health care organizations.”¹

The 15 National CLAS Standards are:

Principal 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.

Governance, Leadership, and Workforce:

2. Advance and sustain organizational governance and leadership that promotes CLAS and health equity through policy, practices, and allocated resources.
3. Recruit, promote, and support a culturally and linguistically diverse governance, leadership, and workforce that are responsive to the population in the service area.
4. Educate and train governance, leadership, and workforce in culturally and linguistically appropriate policies and practices on an ongoing basis.

Communication and Language Assistance:

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.
6. Inform all individuals of the availability of language assistance services clearly and in their preferred language, verbally and in writing.
7. Ensure the competence of individuals providing language assistance, recognizing that the use of untrained individuals and/or minors as interpreters should be avoided.
8. Provide easy-to-understand print and multimedia materials and signage in the languages commonly used by the populations in the service area.

Engagement, Continuous Improvement, and Accountability:

9. Establish culturally and linguistically appropriate goals, policies, and management accountability, and infuse them throughout the organization’s planning and operations.
10. Conduct ongoing assessments of the organization’s CLAS-related activities and integrate CLAS-related measures into measurement and continuous quality improvement activities.
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.

¹“National Culturally and Linguistically Appropriate Services Standards” Accessed 01/02/2020.
<https://www.thinkculturalhealth.hhs.gov/clas/standards>.

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.
13. Partner with the community to design, implement, and evaluate policies, practices, and services to ensure cultural and linguistic appropriateness.
14. Create conflict and grievance resolution processes that are culturally and linguistically appropriate to identify, prevent, and resolve conflicts or complaints.
15. Communicate the organization's progress in implementing and sustaining CLAS to all stakeholders, constituents, and the public.

In alignment with the National CLAS Standards and other indicated national standards, ABS will ensure the provision of Culturally Competent Care to ensure that our members experience culturally and linguistically competent care that is respectful of their values, preferences, and expressed needs by meeting the following objectives:

- Maintain a diverse workforce across all levels and disciplines that adequately mirrors the demographic characteristics of the service areas.
- Provide ongoing education and training on culturally and linguistically appropriate delivery of service to all staff at all levels and across all disciplines.
- Have interpreter services available and coordinated at the member's request through the Customer Care Center and other ABS Staff members who interact directly with our members. This service is to be provided at no cost to our members.
- Assure the competency of language assistance services and ensure that friends and family are not providing interpretation services (except upon request by and with the informed consent of the family member).
- Increase the availability of written materials and resources to be provided in English and Spanish and to establish other foreign languages spoken that comprise 5% of the total population. Members may request materials or materials in alternative formats when communicating with ABS representatives.

III. Accountability and Reporting Structure

The Quality Improvement Committee (QIC) provides oversight for the **Cultural Competency Plan** (CCP) & Program and the effectiveness of the CCP:

a. In accordance with 42 CFR 438.206 of the United States Federal Register, Aflac Benefits Solutions shall have a comprehensive written Cultural Competency Plan (CCP) describing how our program acts to ensure that services are provided in a culturally and linguistically competent manner to all our members, including those with limited English proficiency. The CCP must describe how providers, ABS employees and systems will effectively provide services to people of all cultures, races, ethnic backgrounds, national origin, sex, sexual orientation, gender, gender identification, age, and religion, as well as those with disabilities, in a manner that recognizes value, affirms, and respects the worth of the individual, and protects and preserves the dignity of each. The CCP shall be updated annually and submitted to ABS' Quality Improvement Committee (QIC) for approval for implementation.

b. ABS may elect to distribute a summary of the CCP to network providers, which will be offered at no charge to the provider. We shall also provide access to the full CCP on our organization's public website and on our provider portal. Any updates to the CCP will be posted on same. A written copy of the CCP will be made available upon request and at no cost to the requestor.

c. ABS shall complete an annual evaluation of the effectiveness of its CCP during the previous calendar year. This evaluation includes results from member satisfaction surveys, member grievances, member appeals, provider surveys and other forms of provider feedback. The Quality Improvement staff may track and trend any issues identified in the evaluation and shall implement interventions to improve the provision of services. A description of the evaluation, the analysis of the results and interventions to be implemented will be included within ABS' Quality Management Program Annual Evaluation. This Annual Evaluation shall be submitted to the Quality Improvement Committee for review and approval.

IV. Roles and Responsibilities

Recruitment

Aflac Benefits Solutions, Inc. is committed to a diverse workforce across all levels of the organization that adequately reflects our membership population and the cultural and linguistic diversity of the communities and members served. Importantly, this includes maintaining a practitioner network capable of servicing its diverse membership and is responsive to all member cultural and linguistic needs and preferences.

ABS will review provider demographic data as well as the member demographic data of each region serviced. The analysis will be reviewed to identify any opportunities for improvement to reflect the cultural and linguistic needs of the members served.

Education, Training, and Development

ABS has a system to ensure that all personnel receive education on providing culturally and linguistically appropriate service delivery. ABS continues efforts to continuously revise its personnel training to align with National CLAS Standards and other indicated national standards, i.e., the Americans with Disabilities Act. The Compliance Officer or designee will ensure that training for every new associate is completed as well as annually for all associates.

Provider education is an on-going activity at ABS and will include information concerning CLAS and other indicated national standards. Providers are required to participate in Cultural Competency training and attest to the training during initial on-boarding education and annually thereafter and to cooperate with all on-going education for members and providers to ensure that all cultural, linguistic, and disability standards, policies, and procedures are followed.

Cultural Competency Work-Plan

ABS maintains an annual organization-wide Quality Management Work Plan with a list of measurable goals designed to improve the quality of the treatment and services it provides. This Work Plan includes the provision of culturally and linguistically appropriate services and to reduce healthcare delivery

disparities. The plan is reviewed for approval at least annually by the Quality Improvement Committee (QIC).

Language Access Services

ABS ensures that all members have access to services in their preferred language by the following measures:

- The Customer Care Call Center will be staffed with sufficient bi-lingual personnel to accommodate the diverse linguistic needs of our membership.
- All staff with member and provider contact have access to a telephonic language interpretation service that is free of charge to the member. This service provides translation in more than 170 languages to enable communication to the member in their preferred language. ABS staff is trained in utilizing the service.
- Member materials are made available in Spanish. Members who indicate a preference in a language other than English will receive member materials, such as handbooks, in their requested language and at no additional cost to the member. ABS will continue to investigate additional sources for educational and informational materials available in multiple languages and make these materials available as specified.
- Customer Care associates have access to a relay service to support handling of Text Telephone (TTY) and Telecommunication Device for the Deaf (TDD) phone calls. ABS continues to make members and providers aware that this TTY/TTD service is available. When ASL interpretation is requested, we shall provide assistance to coordinate with the member, provider, and/or ASL interpretation service to best meet the member's needs and at no additional cost to the member.

Competency of Language Access Services

It is the policy of ABS to communicate with members in their preferred language, including TTY/TTD, and in a timely manner. ABS accommodates this function through internal policy and procedures as well as ABS' contracts with subcontracted interpretation and translation vendors. ABS monitors members' preferred languages to identify new linguistic trends to assess any required changes in services, as necessary.

To ensure accurate, objective, and confidential communication, ABS never requires or suggests family, friends, or other unqualified individuals are utilized as interpreters. ABS contracts with competent interpreters and translators that ensure the accuracy of the language services provided. ABS will utilize external translation services for all written materials as required.

ABS understands it is necessary for staff performing bilingual functions to be proficient and qualified. Bilingual staff communicating directly with members in their preferred language must demonstrate proficiency in both English and the member's preferred language.

ABS monitors the language line interpretation service by review and analysis of call recordings for outbound calls for ABS' Customer Care associates to the language translation service. The quality monitoring is to ensure that all interactions between the member, ABS staff, and the interpreter are meeting or exceeding ABS' internal quality standards and requirement that all members experience care that is respectful of their values, cultural or language preferences, and expressed needs.

ABS' quality monitoring of the language line service will be reported no less than quarterly to ABS' Customer Care Management, Quality Improvement Committee and Board of Directors.

Member Data

Membership demographic data is to be monitored on a regular basis to accurately plan for and to implement services that respond to cultural and linguistic characteristics of the service areas.

Community Partnerships

ABS is committed to increasing collaborative partnerships with both community agencies and members with the goal to involve them in the design, implementation, and monitoring of our cultural competency related activities. ABS will utilize Cultural Competency Program information to participate in community special events and outreach activities.

Member Complaints

ABS actively monitors its member complaints and seeks to identify any National CLAS Standards and other cultural competency related issues as an opportunity for improvement in delivery of care. ABS continuously works to ensure that complaint and grievance resolution processes are sensitive to the members' cultural and linguistic needs or preferences. In an effort to identify, prevent, and resolve cultural conflicts or complaints, ABS ensures that:

- Customer Care staff will be available to assist members throughout the complaint process and will implement and facilitate any language translation service that may be required.
- All communication materials, including denial letters, are provided with instructions detailing how to access member materials and/or assistance in the member's preferred language. ABS will continue efforts to provide member materials, such as denial letters, in both English and Spanish.
- All member complaints related to cultural competency are directed to ABS' Quality Improvement Committee (QIC) for review.

Policy Review

ABS' Cultural Competency Plan and any related policies are reviewed a minimum of no less than annually and/or on an as-needed basis by the Quality Improvement Committee, Compliance Committee, and Board of Directors. A copy of ABS' **Cultural Competency Plan** is available to members and providers at no charge upon request by contacting the Compliance Department in addition to a downloadable and searchable PDF document available on our public website and provider portal.