

2010 Cultural Competence Plan Requirements (CCPR) DMH Information Notice No.: 10-02

Reviewer Instructions

CA Department of Mental Health
Office of Multicultural Services
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BACKGROUND INFORMATION

As stated in DMH Information Notice No.: 10-02, the basis for the revised 2010 Cultural Competence Plan Requirements (CCPR) is the document from the U.S. Department of Health and Human Services, Office of Minority Health (2001) *National Standards for Culturally and Linguistically Appropriate Services in Health Care: Executive Summary* (CLAS) (See Federal Standards, page 33 of the CCPR). The revised 2010 CCPR criteria were developed from a compilation of the CCPR (2002), CLAS, and other current cultural competence organizational assessment tools. Combined, these documents incorporate eight domains that cover a system in its entirety:

- Domain 1. Organizational Values
- Domain 2. Policies/Procedures/Governance
- Domain 3. Planning/Monitoring/Evaluation
- Domain 4. Communication
- Domain 5. Human Resource Development
- Domain 6. Community and Consumer Participation
- Domain 7. Facilitation of a Broad Service Array
- Domain 8. Organizational Resources

(Source: University of South Florida, 2006. *Organizational Cultural Competence: A Review of Assessment Protocols*)

From the above eight *domains*, the Cultural Competence Advisory Committee of the Department of Mental Health and the Office of Multicultural Services (OMS) developed eight *criteria* to encompass the revised CCPR (2010) and assist counties in identifying and addressing disparities across the entire mental health system. Those eight criteria are as follows:

- Criterion I: Commitment to Cultural Competence
- Criterion II: Updated Assessment of Service Needs
- Criterion III: Strategies and Efforts for Reducing Racial, Ethnic, Cultural, and Linguistic Mental Health Disparities
- Criterion IV: Client/Family Member/Community Committee: Integration of the Committee Within The County Mental Health System
- Criterion V: Culturally Competent Training Activities
- Criterion VI: County's Commitment To Growing a Multicultural Workforce: Hiring and Retaining Culturally and Linguistically Competent Staff
- Criterion VII: Language Capacity
- Criterion VIII: Adaptation of Services

These eight criteria are a mechanism to examine where Counties lie on the scale of cultural competence. Having used the criteria to form a logic model, the CCPR's development and inclusion of the eight criteria allow Counties to implement cultural and linguistic competence in a variety of settings and move toward operationalizing the

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concept of cultural competence. The assessment portion of the CCPR will identify areas in which the County may need resources, supports, and leverage to support its cultural competence efforts.

Review teams will be convened to review and score each County's CCPR. The reviewer's responsibilities, rating procedures, review process and post rating procedures are detailed below.

REVIEWER'S RESPONSIBILITIES

- A. As a reviewer, you will be responsible for reading and scoring the enclosed CCPR submission. Reviewers are to be familiar with the Cultural Competence Plan Requirements (CCPR, DMH Information Notice No.: 10-02) and attend a DMH sponsored Reviewer Training prior to scoring the CCPR submission.
- B. Each reviewer will enter the Reviewer's and County's name on the scoring tool, score the County's CCPR, and participate in a Review Team meeting at the conclusion of the review period.
- C. To preserve the confidentiality and integrity of the review process, no communication about the CCPR is permitted except among members of the review team assigned to score that County's CCPR and/or staff of OMS. Reviewers will direct issues/concerns to the attention of the lead staff at OMS.
- D. For each requirement, the reviewer will evaluate the County's response and mark the appropriate score for each requirement (please see next section, "Rating Procedures" for detailed information on the scoring process). Each reviewer must provide written comments to support the assigned score. Evidentiary documentation shall include the strengths and assets of the County's responses and/or identified challenges with the County's responses.
- E. CCPR's are to be scored using the criteria on the scoring tool and based solely on the information contained in the CCPR. The entire content of the CCPR submission should be considered when evaluating a County's response. If a County fails to address a specific requirement in the appropriate or expected section of the document, but the requirement is addressed elsewhere in the document, the reviewer must consider if that response addresses the original requirement.
- F. Reviewers will also assess the overall score of how the CCPR seeks to support the planning and integration of culturally, linguistically, racially, and ethnically competent services in the public mental health system to begin addressing long-standing disparities and to meet the needs of unserved, underserved and inappropriately served populations.

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REVIEW PROCESS

- A. The CCPR submission will be evaluated and scored by a review team composed of a minimum of three members: a lead staff from OMS, a Cultural Competence/Ethnic Services Manager, and one or more additional reviewers.
- B. Reviewer packets will include: DMH Information Notice No.: 10-02, the County's CCPR, reviewer instructions, blank scoring forms, and contact information for the lead staff person at DMH.
- C. Reviewers will have 30 days to score each CCPR submission assigned.
- D. Reviewers may be assigned to multiple, concurrent reviews.
- E. If necessary, a review team meeting will be scheduled to discuss major differences in scoring by team members. This will provide reviewers an opportunity to adjust scores if new information becomes available during the course of the discussion. These meetings will take place at the DMH Headquarters and/or via conference call and will last approximately two hours. Reviewers must discuss scoring differences greater than one category.

RATING PROCEDURES

- A. The following four rating scales will be utilized to score the requirements, depending on type and scope of the requirement (specific terms defined in the next section, Defining Criteria/Terms):
 - 1. Phases of Implementation
 - 2. Quality of Description
 - 3. Quality of Analysis
 - 4. Met/Unmet
- B. Defining Criteria/Terms

In order to provide clarity for the rating criteria, OMS would like reviewers to adhere to the following definitions of terms:

Meets Requirements— For the purpose of assigning a score for each criterion, requirements will be considered “met” if the County’s response provides sufficient detail to determine that the requirement is fully implemented, partially implemented, or the County is actively planning to implement the requirement. Additionally, for narrative descriptions or analysis, the County’s response is complete and detailed.

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Fully Implemented— The County has completely implemented the requirement according to the guidelines described in the CCPR

Partially Implemented— The County has taken initial steps to ensure that the requirement is implemented in its mental health system, further steps are required to achieve full implementation

Planning to Implement—The County has identified a plan and intends to implement the requirement

Detailed— A complete response that includes ALL required elements with reasoning and analysis

Minimal— Very small or slight, the least possible

Succinct— Compact precise expression

Sufficient— A response that satisfies the basic or minimum requirement

C. For the purposes of scoring each criterion, the following definitions apply:

Meets all— 90-100%

Meets most— 70-89%

Meets some but not all— 50-69%

Does not provide enough detail to determine— 10-50%

County did not respond— below 10%¹

D. Each reviewer will evaluate the County's CCPR submission for each of the eight criteria. In the space provided, reviewers will indicate (by marking the appropriate box) the assigned score for each requirement and provide written comments to justify the assigned score.

E. Upon completion of the review of the individual requirements for each criterion, reviewers will complete a worksheet to determine the final score for each criterion. Reviewers will be expected to include written comments to substantiate the scores in the spaces provided below each requirement as well as comments to evaluate the County's overall response to each criterion. These efforts will assist in determining the County's final score.

¹ The county's response will be considered non-responsive if less than 10% of all of the requirements in a criterion are considered "met" according to the definition in this document.

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POST RATING PROCEDURES

- A. OMS will input reviewers' scores into a spreadsheet and tally the scores, according to a predetermined formula², to determine the final score for the County's CCPR.
- B. Utilizing written comments from the review team as evidentiary support, OMS will draft a summary letter to the County indicating the CCPR initial score, identified strengths, and areas for improvement and technical assistance.
- C. The County will be given a 30-day period to provide a written response to the CCPR score and summary report. The County's response may include clarifying information regarding specific concerns from the review teams. Counties are not required to provide a written response, it is optional.
- D. OMS will evaluate the supplemental information received to determine if the score will be adjusted.
- E. If necessary, OMS will reconvene the review team to evaluate the supplemental information that may be provided in response to the summary report and score.
- F. The final CCPR score for each County will be posted on the DMH website. The County's CCPR, OMS' Summary Report, and the County's written response will be posted along with the final score.

² OMS will use the average scores of the review team to determine a final score for the County's CCPR. The formula for the final CCPR score is based upon a predetermined weighted percentage for each criterion and the overall score. For more information about the formula, please contact the Office of Multicultural Services, (916) 651-9524 or via email at OMS@dmh.ca.gov.