Strategy 7: Enhance your Marketplace's cultural competence

Key Findings and Recommendations

People seeking coverage from the Marketplaces are diverse in terms of race, ethnicity, spoken language, gender, sexual orientation, and socio-economic and disability status. To effectively serve every customer, Marketplaces must develop and maintain cultural competence, which refers to the ability of organizations to provide services that are respectful and responsive to people with different values, beliefs, behaviors, and needs.[95] Developing cultural competence will help you attract the full range of consumers, support them in completing core Marketplace activities, improve health equity, and improve their experience throughout the process (see exhibit 4.S7.1).

Steps you can take to improve the cultural competence of your Marketplace include the following:

- Assess your organization's current cultural competence, and make the improvement of cultural competence an organizational priority.
- Identify your community's needs.
- Recruit, retain, and promote a diverse workforce.
- Train staff on cultural competence.
- Offer high-quality language assistance services.
- Publicize the availability of language assistance services.
- Offer accommodations for consumers who have visual and hearing disabilities.

The Problem

Marketplaces must meet the needs of a diverse population. Nationally, approximately 21 percent of adults speak a language other than English at home,[96] 26 percent report their race as non-White,[97] and 6 percent have a vision or hearing disability.[98] Several SBM states have much higher estimates. For example:

- 75 percent of adults in Hawaii and 61 percent of adults in the District of Columbia report their race as non-White.[99]
- 42 percent of adults in California and 36 percent of adults in New Mexico speak a language other than English at home.[96]

How the Cultural Competence Strategy Improves the Consumer Experience (Exhibit 4.S7.1)

Understanding and practicing cultural competence can help ensure that the Marketplaces meets the needs of a diverse population of consumers. For example, Marketplaces can apply this strategy to improve performance in the following survey measures:

- Getting information and help from the website.
- Getting information and help from the call center.
- Getting information and help from in-person assisters.
- Getting information in a needed language or format.

While more Whites are uninsured overall, a higher percentage of Blacks, Asians, and Hispanics are uninsured—a core target population for Marketplaces.[100]

Race, ethnicity, language, disability status, and other social factors are associated with goals, habits and values that are likely to influence how consumers interact with the Marketplace and how they evaluate their experience with its services. If Marketplaces do not demonstrate cultural competence, consumers may be:

- **Unable or unwilling to offer important information**. For example, consumers may not be able to communicate effectively with Marketplace staff because of language barriers.

- **Unclear on information provided by the Marketplace.** For example, it is common in some cultures to live with extended family.[101] In response to questions about household size, consumers may not provide the number of people in their tax household (i.e., spouse and dependents). Instead, they may mistakenly include all family members (e.g., grandparents, aunts, uncles), which could impact their eligibility determination.
- **Unhappy with the services the Marketplace provides.** For example, different cultures have different communication norms regarding eye contact, pace of speech, size of personal space, and speech volume and tone.[102] If Marketplace staff are not aware of these differences or do not adapt their communication style to a consumer's cultural norms, their interaction may be uncomfortable or consumers may experience disrespect.

The Strategy

Marketplaces can enhance the cultural competence of their services in order to better meet the needs of current and potential Marketplace enrollees. Providing culturally competent services means applying three core principles:[103]

- **Equity**—consumers should have equal access to the Marketplace and the services it provides.
- **Understandability**—consumers should be able to understand and act upon the information provided by the Marketplace.
- **Respect**—consumers should perceive that the Marketplace treats them with respect.

Benefits of the Strategy

Providing culturally and linguistically competent services has three main benefits:

- Attracting consumers across all groups and retaining them as Marketplace users.
- Helping consumers effectively complete core Marketplace activities such as applying for financial assistance, selecting a health plan, and enrolling in a health plan.
- Providing those consumers with a better experience while using the Marketplace's services.

Ways to Implement the Strategy

1. Recruit, retain, and promote a diverse workforce.

Marketplaces' employee demographics, from frontline staff to executives and board members, should reflect the demographic composition of the state.[104] A diverse workforce can more easily anticipate the cultural competence issues that your Marketplace will face and generate effective ideas for addressing those issues. In addition, a workforce that reflects the demographic composition of the community you serve will help to develop trust and rapport with members of groups who may otherwise be reluctant to interact with government agencies. The following strategies can help your Marketplace recruit and retain a diverse workforce:[103, 105]

- Collect and analyze data on hiring, retention, and promotion that include demographic information so that you can identify areas for improvement and progress toward workforce diversity goals.
- Recruit staff through outlets catering to the specific needs of special populations, such as foreign language job boards, minority health professional association job boards, disability providers, vocational rehabilitation agencies, and historically Black colleges and universities.
- Develop job descriptions and recruiting notices that include skill sets and areas of knowledge related to cultural competence.

2. *Assess your organization's current cultural competence, and make the improvement of cultural competence an organizational priority.*

An important first step to improving cultural competence is to identify your organization's strengths and opportunities for improvement. Several self-assessment tools are listed in exhibit 4.S7.2. Completing this kind of assessment can provide a solid understanding of where to focus your quality improvement efforts.

Making cultural competence a priority is key to ensuring that the Marketplace allocates the necessary resources to the improvement process.[106] Tactics for making cultural competence an organizational priority include the following:

- Infuse a commitment to cultural competence in the language used to describe the vision, goals, and mission of your Marketplace.
- Identify and develop "champions" throughout the organization who can initiate action plans related to cultural competence goals, keep them moving, and track them in the face of competing priorities.
- Create lines of accountability by, for example, incorporating goals related to cultural competence within employee performance reviews or publicly distributing measures of culturally competent performance.

Resources: Tools for Assessing Cultural Competence (Exhibit 4.S7.2)

- *Race Matters: Organizational Self-Assessment* (The Annie E. Casey Foundation). Available at: http://www.aecf.org/resources/race-matters-organizational-self-assessment/
- *Cultural Competence Checklists* (American Speech Language Hearing Association). Available at: http://www.asha.org/practice/multicultural/self/

3. *Identify your Marketplace consumers' needs.*

Marketplaces can take several steps to better understand the characteristics and needs of their eligible population.

Improve the completeness and accuracy of demographic data on Marketplace users. Because the demographic questions asked as part of the application process are optional, the data available for your Marketplace may not accurately represent the population of users. However, your Marketplace could require this information. To supplement the information currently available, your Marketplace can:

- Incorporate demographic data collection into call center protocols to capture information for enrollees who did not provide it during the online application process. You may want to develop, for example, more detailed categories for the race and ethnicity questions, such as adding groups not included in standard questions that have a high local presence.[107]
- Review the demographic information for your Marketplace that is collected as part of the Marketplace Survey. The survey includes key demographic questions developed by the U.S. Department of Health and Human Services.

Demographic data are most accurate and complete when collected in person and asked for verbally.[108] However, employees may feel uncomfortable about collecting demographic data and may not know how to go about asking people about their race, ethnicity, and special needs. See exhibit 4.S7.3 for a Health Research and Educational Trust (HRET) toolkit that provide some tips on how to prepare staff members to initiate the conversation in a sensitive and respectful way at.[109, 110]

Resource: HRET Disparities Toolkit (Exhibit 4.S7.3)

For more information on how to prepare staff on collecting demographic data, see the *HRET Disparities Toolkit* at: http://www.hretdisparities.org/Staf-4190.php

Understand the demographic composition of your state. Current consumers in the Marketplace may not reflect the demographic composition of the entire state. To better understand the population of potential Marketplace users, it may be helpful to consult other sources of demographic data (see exhibit 4.S7.4). Because localized needs may be masked by state-level data, be sure to review data for smaller geographical areas as well, such as counties and metropolitan areas.

Resources: Free Sources of Demographic Data (Exhibit 4.S7.4)

Websites where you can access information about demographics and languages spoken in your service areas include:

- http://www.mla.org/census_data
- http://www.census.gov/population/www/socdemo/lang_use.html

Partner with community organizations. Community organizations such as nonprofits, schools, advocacy groups and churches can offer useful insights into the needs of minority and other special populations. Consider working with community organizations to assess whether the Marketplace is meeting the needs of its population (see exhibit 4.S7.5 for one example). Ways to partner with community organizations include:[95]

- Developing advisory groups that provide information and recommendations to the Marketplace.
- Conducting listening sessions hosted by community organizations to solicit questions and suggestions from their constituencies.
- Consulting informally with community leaders.

Marketplace Highlight: Oregon Marketplace's Outreach to the American Indian Community (Exhibit 4.S7.5)

Cover Oregon—Oregon's Health Insurance Marketplace—met at least monthly with the nine federally recognized Indian tribes and other Indian groups in the state during its early planning stages. The purpose of these meetings was to consult on general cultural issues as well as to get feedback on specific aspects of the Marketplace, such as the website.[111]

4. Train staff on cultural competence.

Marketplaces can provide training to ensure that employees have the knowledge, skills, and tools to provide culturally competent services. While the appropriateness of training topics will depend on the roles of employees participating in training, consider including the following topics:[112, 103]

- Tailor services to meet the unique needs of individuals with diverse cultural practices and beliefs, limited English proficiency, and disabilities or special needs.
- Explore one's own and others' culture.
- Avoid stereotyping and implicit bias.
- Communicate professionally in unfamiliar or difficult situations.
- Be sensitive to interpersonal cues and adapt communication styles to avoid violating cultural communication norms of minority consumers.
- Work effectively with interpreters.
- Provide disability-competent care.
- Apply laws and provisions that pertain to the delivery of culturally and linguistically appropriate care and services.[113, 114, 115, 116]

Resources: Organizations That Offer Evidence-Based Cultural Competence Training (Exhibit 4.S7.6)

- *Cultural Competency Training* (CAL Learning). Available at: http://www.callearning.com/cultural-competency-training.php
- *Cultural Competency in Health and Human Services* (The Cross Cultural Health Care Program). Available at: http://xculture.org/cultural-competency-programs/

Several organizations offer cultural competence training that is based on research and delivered in easy to understand ways (see exhibit 4.S7.6).

Exhibit 4.S7.7 describes one Marketplace's approach to cultural competence training.

Cultural Competence Training for a Marketplace's Board (Exhibit 4.S7.7)

Through the National Academy of State Health Policy's Health Equity Project, Connecticut's Office of Health Reform and Innovation developed health equity training for its Health Insurance Exchange Board of Directors. The training included information on state health disparities from the public health department as well as information on health equity improvement efforts in other states.[117]

5. Offer high-quality language assistance services.

Marketplaces are required to offer language assistance services, typically in the form of translated materials and interpreting services.[118] A good rule of thumb is to offer language assistance services if a group that speaks a language other than English represents at least 5 percent of people (or 1,000 people) within the state.[xx] Consider translating materials and providing interpreting services for a few core languages spoken by current and potential enrollees and then supplementing these services with phone or video interpreting services to assist consumers whose language is less prevalent. The relevant languages depend on your state's population (see exhibit 4.S7.8 for an example of how a Marketplace provided materials in a variety of languages).

Providing Materials in a Variety of Languages: Example from a Marketplace (Exhibit 4.S7.8)

Covered California makes key materials available in 12 languages other than English: Arabic, Armenian, Chinese, Farsi, Hmong, Khmer, Korean, Laotian, Russian, Spanish, Tagalog, and Vietnamese.

Translating materials. The first task is to decide which materials to translate. Prime candidates include:[xxi]

- Key office signage.
- Documents that must be provided by law.
- Application forms.
- Letters or notices pertaining to the reduction, denial, or termination of financial assistance or coverage.
- Notices of the availability of free language assistance services.

All bilingual or contracted personnel who serve as translators should understand the expected reading level of the audience and, where appropriate, have fundamental knowledge about the target language group's vocabulary and phraseology. When assessing the suitability of translation services, ask for a sample periodically. Show the translation to a native speaker of the target language to verify the translation's faithfulness to the intent, content, and cultural context of the original source document.[119]

[xx] See National Center for Cultural Competence website. Available at: http://nccc.georgetown.edu/
[xxi] See Limited English Proficiency (LEP): A Federal Interagency Website. Available at: http://www.lep.gov

Interpreter services. Options include training current bilingual staff to serve as interpreters, hiring or contracting with trained or certified interpreters, and using phone or video interpreting services. To avoid the risk of serious miscommunications, avoid using untrained individuals, such as a consumer's friend or family member or untrained bilingual staff, as interpreters. Fluency in another language does not guarantee an adequate command of the terms your Marketplace uses nor an understanding of local dialects. See exhibit 4.S7.9 for a list of traits to look for in interpreters.

What to Look for in Interpreters [xxii] (Exhibit 4.S7.9)

- Demonstrates proficiency and ability to communicate information accurately in both English and in the other language and identifies and uses the appropriate mode of interpreting (e.g., consecutive, simultaneous, summarization, or sight translation).
- Has knowledge in both languages of any specialized terms or concepts peculiar to the Marketplace and of any particularized vocabulary and phraseology used by the person with limited English proficiency.
- Understands and follows confidentiality, impartiality, and ethical rules of the Marketplace.

Sources of recommendations for high-quality interpreting and translation services include community-based organizations such as community colleges, local hospitals, managed care organizations, refugee resettlement sites, and faith-based entities.[xxiii] See exhibit 4.S7.10 for a list of guidelines and checklists that can help your Marketplace ensure the provision of high-quality language assistance services.

Resources: Ensuring High-Quality Language Assistance Services (Exhibit 4.S7.10)

- *Translation: Getting It Right. A Guide to Buying Translation* (American Translators Association). Available at: http://www.atanet.org/publications/Getting_it_right.pdf
- The National Board of Certification for Medical Interpreters website. Available at: http://www.certifiedmedicalinterpreters.org/
- *Process of Translation and Adaptation of Instruments* (American Translators Association). Available at: http://www.who.int/substance_abuse/research_tools/translation/en/

6. Embed language assistance services into the day-to-day operations of the Marketplace.

Marketplaces must make language assistance services part of their ongoing operations. Start by training all employees who interact with consumers, not just those who are providing the language assistance services:[xxiv]

- Write policies and procedures for informing consumers about language assistance services, including information about what services are available, how employees should determine whether consumers need these services, and what to do if communication is problematic.
- Consider developing scripts that employees can use when interacting with consumers to further reduce ambiguity and to standardize the process.
- At regularly scheduled intervals, review, update, and redistribute materials documenting language assistance policies and procedures.

Embed information about access to language assistance services at multiple touch points so that consumers who speak little or no English do not "drop out" or avoid the Marketplace because of the mistaken perception that they will not be able to communicate in their preferred language. For example:[120, 119]

[xxii] Limited English Proficiency (LEP): A Federal Interagency Website. Available at: http://www.lep.gov
[xxiii] See National Center for Cultural Competence website. Available at: http://nccc.georgetown.edu/
[xxiv] See Limited English Proficiency: A Federal Interagency Website. Available at: http://www.lep.gov

- Create voice prompts for automated phone systems in multiple languages.
- Include language access options prominently on the website.
- Include "tag lines" on all English Marketplace materials notifying individuals of the availability of language assistance services and providing directions on how to access those services. The tag lines should be in the languages in which the Marketplace offers assistance.
- Work with community organizations and non-English-speaking media to publicize the availability of Marketplace services in multiple languages.

7. Offer accommodations for consumers who have visual, hearing, and other disabilities.

Marketplaces can meet the needs of consumers with visual, hearing, and other disabilities by employing the following strategies:[121, 122]

- Instruct staff to read forms and provide appropriate assistance if necessary.
- Take a person-centered approach to accessing Marketplace services based on the individual consumer's needs.
- Provide frequently used or important documents in braille, large print, or on tape.
- Hire or contract with sign language, oral, or cued speech interpreters.
- Offer Computer Assisted Real-time Transcription (CART). CART is a service in which an operator types what is said into a computer that displays the typed words on a screen.

Exhibit 4.S7.11 lists resources to assist with integrating high-quality visual, hearing, and disability services into the Marketplace.

Resources: Accommodating the Needs of Consumers with Visual and Hearing Impairments (Exhibit 4.S7.11)

- *Americans with Disabilities Act Technical Assistance Materials* (U.S. Department of Justice). Available at: http://www.ada.gov/ta-pubs-pg2.htm
- American Sign Language Interpreter Network website. Available at: http://www.aslnetwork.com/
- *Braille Transcription Resource List* (National Federation of the Blind). Available at: https://nfb.org/braille-transcription-resource-list
- *NDNRC Materials* (National Disability Navigator Resource Collaborative). Available at: http://www.nationaldisabilitynavigator.org/ndnrc-materials/