



Policy: AA.1251
Title: **Diversity, Equity, and Inclusion Training Program**
Department: Equity and Community Health
Section: Not Applicable

CEO Approval: /s/ Michael Hunn 03/06/2025

Effective Date: 12/05/2024
Revised Date: 03/01/2025

Applicable to: ☒ Medi-Cal
☒ OneCare
☒ PACE
☒ Administrative

I. PURPOSE

This policy describes CalOptima Health's Diversity Equity, and Inclusion (DEI) Training program and ensures that all CalOptima Health Employees, Subcontractors, Downstream Subcontractors, and Network Providers, are informed and trained on DEI including standards for sensitivity, diversity, Cultural Competency and cultural humility and Health Equity training programs. This training program is in accordance with applicable Department of Health Care Services (DHCS) requirements, National Committee for Quality Assurance (NCQA) Health Equity Accreditation Standards, and Centers for Medicare & Medicaid Services (CMS) requirements.

II. POLICY

A. CalOptima Health's Chief Health Equity Officer (CHEO) shall oversee the DEI training program and ensure that all CalOptima Health Employees, as well as Subcontractors, Downstream Subcontractors and Network Providers, receive the mandatory DEI training.

1. The CHEO shall review all training materials to ensure content is up-to-date, evidence based and includes best practices for serving Members that are specific to CalOptima Health's service area of Orange County.
2. The CHEO will conduct an annual evaluation, or on a more frequent basis, as necessary, for evolving best practices of its DEI education and Training program by using the following strategies:
 - a. Identifying opportunities for education and Training based on analysis of health outcomes impacted by cultural and linguistic factors;
 - b. Specifically addressing training deficiencies found in the health care delivery system with educational solutions;
 - c. Instituting methods to partner with and collaborate with community-based organizations that work with diverse communities for appraisal of educational efforts;
 - d. Involving community leadership and decision-makers, including those with lived experience, in the design and development of education evaluation programs; and

- e. Engaging with CalOptima Health's Member Advisory Committee (MAC) and Provider Advisory Committee (PAC) for continued DEI Training program recommendations and feedback for consideration
- B. CalOptima Health shall ensure that all CalOptima Health Employees and all Network Providers, regardless of their cultural or professional training and background, who interact with CalOptima Health Members receive sensitivity, diversity, Cultural Competency and cultural humility, DEI, and bias training in accordance with the CalOptima Health Contract with DHCS for Medi-Cal.
- C. Training must be specific to CalOptima Health's Member demographics in Orange County including but not limited to Members' sex, race, color, religion, ancestry, national origin, creed, ethnic group identification, age, mental disability, physical ability, medical condition, genetic information, health status, marital status, gender, gender identity, sexual orientation, or identification with any other persons or groups defined in California Penal Code Section 422.56, within specific regions.
- D. CalOptima Health will implement comprehensive ongoing DEI Training for all Employees on an annual basis, and in accordance with CalOptima Health Policy EE.1103: Provider Network Training shall require all Subcontractors, Downstream Subcontractors, and Network Providers to participate in online DEI Training during times of re-credentialing or contract renewals, inclusive of the following topics:
 - 1. Sensitivity;
 - 2. Cultural Competency and cultural humility;
 - 3. DEI;
 - 4. Member experience, including discrimination and the impacts of implicit bias;
 - 5. Explicit consideration and acknowledgement of structural and institutional racism and health inequities, and their impact on Members, Employees, Network Providers, Subcontractors, and Downstream Subcontractor;
 - 6. Information about relevant health inequities and identified cultural groups in CalOptima Health's service area, which includes but is not limited to:
 - a. Seniors and Persons with Disabilities population (SPD);
 - b. Those with chronic conditions;
 - c. Those with specialty mental health service and/or substance use disorder needs;
 - d. Those with intellectual and developmental disabilities;
 - e. Children with special health care needs;
 - f. The groups' beliefs about illness and health; and
 - g. Lesbian, gay, bisexual, transgender, queer or questioning, intersex, asexual, and more (LGBTQIA+) concerns, including asking for and respecting the name and pronouns Members and family members use and avoiding assumptions about partners, spouses, children and health behaviors.

7. Need for gender affirming care;
8. Methods of interacting with Providers and the health care structure;
9. Traditional home remedies, alternative and complementary treatment that may impact how the Provider should treat the Member; and
10. Language, communication and literacy needs.

E. CalOptima Health's DEI Training program shall incorporate:

1. Accommodation of different learning styles (e.g., visual, auditory, or written) and strategies to promote motivation and incentives to integrate concepts into practice and behavior change;
2. Components to the training should allow for observational assessments and evaluation strategies;
3. Community input and advisement on development of the training as well as relevant issues, barriers, and discrimination within specific CalOptima Health service locations;
4. Development of a process for evaluating and determining the need for special initiatives regarding material to be included in the DEI Training program;
5. Recruitment and retention of staffing that represents the community served, are responsive to the community needs, and dedicated staff who apply the DEI Training program principles;
6. Assessment of Employees, Subcontractors, Downstream Subcontractors, and Network Providers for incorporating DEI Training goals into their interactions with Members and Employees with lived experience;
7. Designated staff for coordinating and facilitating the integration of DEI Training guidelines.
8. Establishment of an array of communication tools for distributing information to Employees, Subcontractors, Downstream Subcontractors, and Network Providers;
9. Participation with government, community and educational institutions in matters related to best practices encompassing the principles of DEI Training so that they may be integrated into CalOptima Health's specific DEI training program;
10. Evaluation of the effectiveness of the DEI Training program strategies for improving the health status of diverse populations with applicable alterations to the DEI Training; and
11. Provision of training in multiple formats (e.g.; braille, large print, audio, translations, etc.) as requested by Employees, Subcontractors, Downstream Subcontractors, and Network Providers.

F. In accordance with CalOptima Health Policy GG.1667: CalAIM Population Health Management Program, CalOptima Health shall address the impact of structural and institutional racism and health inequities on Members, Employees, Network Providers, Subcontractors, and Downstream Subcontractors and communicate pertinent information regarding the Population Needs Assessment (PNA) findings and identified targeted strategies.

G. CalOptima Health shall retain Training records for a period of at least ten (10) years.

- H. CalOptima Health shall make Training materials and resources available to all Employees via CalOptima Health's learning management system (LMS) and related Training sources.
- I. CalOptima Health shall ensure Network Providers, Subcontractors and Downstream Subcontractors receive Training in accordance with CalOptima Health Policy EE.1103: Provider Network Training.
- J. Quality Improvement and Health Equity:
 - 1. Annually, CalOptima Health will inform the Quality Improvement and Health Equity Committee (QIHEC) of this DEI Training program with reports that include at a minimum:
 - a. Training program materials;
 - b. Compliance reports and;
 - c. Any adjustments made to the original Training program.
 - 2. The CHEO shall incorporate the DEI Training program within the Quality Improvement and Health Equity Transformation Program (QIHETP) goals for quality improvement and Health Equity projects pertaining to cultural needs of the Members.
 - a. The CHEO shall integrate components of DEI Training priorities in the QIHETP allowing Members to assess whether CalOptima Health meets their culturally and linguistically diverse needs.
 - 3. CalOptima Health shall conduct DEI Training program evaluation with ongoing quality improvement programs.
- K. CalOptima Health shall:
 - 1. Evaluate Employees and Member grievances and complaints regarding discrimination, cultural biases, or insensitive practices in accordance with CalOptima Health Policy HH.1102: Member Grievance and CalOptima Health Policy HH.1104: Discrimination Grievances.
 - a. CalOptima Health shall implement appropriate corrective action(s), up to and including termination, in response to any violation of this policy, in accordance with CalOptima Health Policy GA.8022: Performance and Behavior Standards.
 - 2. Evaluate Member's language access services to include written and oral interpretation services and the ability to request auxiliary aids for both in-person office visits and telehealth visits;
 - 3. Evaluate Member satisfaction regarding culturally competent care;
 - 4. Monitoring and tracking of DEI transgressions utilizing CalOptima Health developed and implemented grievance and appeal monitoring systems;
 - 5. In accordance with CalOptima Health Policies GG.1613: Initial Health Appointment and GG.1667: CalAIM Population Health Management Program, CalOptima Health shall identify health care needs of diverse Members, and conduct assessments to monitor the effectiveness of health care services; and
 - 6. Maintain information on CalOptima Health's quality performance upon request to Members in a format that is easily understood.

III. PROCEDURE

- A. On an annual basis, CalOptima Health shall send an email notification to all Employees, Network Providers, Subcontractors and Downstream Subcontractors regarding the annual awareness and sensitivity, Cultural Competency and cultural humility, DEI and bias Training. The notification shall inform CalOptima Health Employees, Network Providers, Subcontractors and Downstream Subcontractors of the following:
 - 1. Requirements regarding Training;
 - 2. Location of Training module(s);
 - 3. Instructions for completion of Training;
 - 4. Training deadline; and
 - 5. Contact number for questions related to the Training.
- B. CalOptima Health shall run a report prior to the Training deadline to identify those who have completed the mandatory Training. Those who have not completed the Training shall be notified via email to remind them to take the required Training by the deadline.
- C. Newly hired Employees will be assigned the Training upon hire. Completion is required within ninety (90) days of start date.
 - 1. Employees failing to complete the assigned Training in the required time period shall be subject to system shutdowns, as outlined in compliance training desktop procedures, and possible corrective action, in accordance with CalOptima Health Policy GA.8022: Performance and Behavior Standards.
- D. CalOptima Health participating Network Providers shall ensure Training is completed in accordance with CalOptima Health Policy EE.1103: Provider Network Training.
 - 1. The Office of Compliance shall be responsible for taking appropriate corrective actions in response to reported issues of noncompliance, in accordance with CalOptima Health's Policies HH.2002: Sanctions and HH.2005: Correction Action Plan.
- E. CalOptima Health shall coordinate DEI Training with other MCPs located in the same county.
 - 1. CalOptima Health and other MCP's Health Equity Officers within the county shall collaborate on DEI Training criteria to ensure alignment and accurate Training record.
- F. CalOptima shall develop a system of communication to ensure coordination and dissemination of cultural and linguistic information and activities to Employees, Subcontractors, Downstream Subcontractors, and Network Providers.

IV. ATTACHMENT(S)

Not Applicable

V. REFERENCE(S)

- A. California Penal Code, §422.56
- B. CalOptima Health Contract with the Centers for Medicare & Medicaid Services (CMS) for Medicare Advantage
- C. CalOptima Health Contract with the Department of Health Care Services (DHCS) for Medi-Cal
- D. CalOptima Health Policy EE.1103: Provider Network Training
- E. CalOptima Health Policy GA.8022: Performance and Behavior Standards
- F. CalOptima Health Policy GG.1613: Initial Health Appointment
- G. CalOptima Health Policy GG.1667: CalAIM Population Health Management Program
- H. CalOptima Health Policy HH.2002: Sanctions
- I. CalOptima Health Policy HH.2005: Corrective Action Plan
- J. CalOptima Health Policy HH.1102: Member Grievance
- K. CalOptima Health Policy HH.1104: Discrimination Grievances
- L. Department of Health Care Services (DHCS) All Plan Letter (APL) 24-016: Diversity, Equity, And Inclusion Training Program Requirements (Supersedes APL 23-025)
- M. Department of Health Care Services (DHCS) All Plan Letter (APL) 24-017: Transgender, Gender Diverse or Intersex Cultural Competency Training Program and Provider Directory Requirements

VI. REGULATORY AGENCY APPROVAL(S)

None to Date

VII. BOARD ACTION(S)

Date	Meeting
12/05/2024	Regular Meeting of the CalOptima Health Board of Directors

VIII. REVISION HISTORY

Action	Date	Policy	Policy Title	Program(s)
Effective	12/05/2024	AA.1251	Diversity, Equity, and Inclusion Training Program	Medi-Cal OneCare PACE Administrative
Revised	03/01/2025	AA.1251	Diversity, Equity, and Inclusion Training Program	Medi-Cal OneCare PACE Administrative

IX. GLOSSARY

Term	Definition
Centers for Medicare & Medicaid Services (CMS)	The federal agency under the United States Department of Health and Human Services responsible for administering the Medicare and Medicaid programs.
Cultural Competency	<p>The ability to actively apply knowledge of cultural behavior and linguistic issues when interacting with Members from diverse cultural and linguistic backgrounds. Essential elements of Cultural Competency include:</p> <ol style="list-style-type: none"> 1. An unbiased attitude and organizational policy that values and respects cultural diversity and respect for the multifaceted nature and individuality of Members; 2. Awareness that culture and cultural beliefs may influence health and health care delivery; knowledge about, and respect for diverse attitudes, beliefs, behaviors, and practices about preventive health, illness and diseases, as well as differing communication patterns; 3. Recognition of the diversity among Members (e.g., religion, socioeconomic status, physical or mental ability, age, gender, sexual orientation, social and historical context, generational, and acculturation status); 4. Skills to communicate effectively with diverse Member populations and application of those skills in cross-cultural interactions to ensure equal access to quality health care; 5. Knowledge of disease prevalence in specific cultural populations, whether defined by race, ethnicity, socioeconomic status, physical or mental ability, gender, sexual orientation, age, or disability; 6. Programs and policies that address the health needs of diverse Member populations; and 7. Ongoing program and service delivery evaluation with regard to cultural and linguistic needs of Members.
Department of Health Care Services (DHCS)	The single State Department responsible for administration of the Medi-Cal program, California Children's Services (CCS), Genetically Handicapped Persons Program (GHPP), Child Health and Disabilities Prevention (CHDP), and other health related programs.
Downstream Subcontractor	An individual or an entity that has a Downstream Subcontractor Agreement with a Subcontractor or a Downstream Subcontractor. A Network Provider is not a Downstream Subcontractor solely because it enters into a Network Provider Agreement.
Employee	All employees of CalOptima Health, including all permanent and temporary employees, volunteers, and other employed personnel.
Health Equity	The reduction or elimination of Health Disparities, Health Inequities, or other disparities in health that adversely affect vulnerable populations.
Member	A beneficiary enrolled in a CalOptima Health program.
Network Provider	For purposes of this policy, a Provider that is contracted with CalOptima Health or a Health Network contracted with CalOptima Health for the delivery of Covered Services.
Population Needs Assessment (PNA)	An evaluation which identifies Member health status and behaviors, Member health education and C&L needs, health disparities, and gaps in services related to these issues.
Seniors and Persons with Disabilities (SPD)	Medi-Cal beneficiaries who fall under specific Aged and Disabled Aid Codes as defined by the DHCS.

Term	Definition
Subcontractor	An individual or entity that has a Subcontractor Agreement with CalOptima Health or CalOptima Health's Subcontractor that relates directly or indirectly to the performance of CalOptima Health's obligations under its contract with DHCS. A Network Provider is not a Subcontractor solely because it enters into a Network Provider Agreement.
Training	<p>Content delivered or deployed in the following manner as appropriate to the content and audience:</p> <ol style="list-style-type: none"> 1. Internal communication tools (newsletters, emails, etc.); 2. Job Aids; 3. Face-to-face delivery; 4. Webinar Training; 5. Online content deployed on CalOptima Health University 6. CalOptima Health's InfoNet; 7. CalOptima Health's website Provider Portal; 8. Online content for posting on provider group or partner website for Downstream education; and 9. Train-the-Trainer.