



2022
Cultural Competency
Program

Table of Contents

Introduction	3
Program Purpose	3
CLAS STANDARD 1	3
CLAS STANDARD 2	4
CLAS STANDARD 3	4
EEO POLICY COMMITMENTS	5
CLAS STANDARD 4	6
CLAS STANDARD 5	7
1. Interpreter Services:	7
2. Hearing/Speech Impaired Services:	7
3. Visually Impaired Services:.....	7
4. Translation of Vital Written Member-Facing Communications.....	7
5. Website	8
CLAS STANDARD 6	8
CLAS STANDARD 7	8
CLAS STANDARD 8	9
CLAS STANDARD 9	9
CLAS Standard 10	10
CLAS STANDARD 11	10
CLAS STANDARD 12	11
CLAS STANDARD 13	11
CLAS STANDARD 14	11
CLAS STANDARD 15	11
Exhibit A: Member-Facing Vital Documents	13
Exhibit B – Cultural Competency Training	14
Exhibit C - 2020 Work Plan	14

Introduction

Versant Health, Inc. is the parent company of the following subsidiaries which are engaged in various aspects of the vision benefit management business: Superior Vision Corp. Superior Vision Services, Inc. (“SVS”); Superior Vision Insurance, Inc. (“SVI”); Superior Vision Benefit Management, Inc. (“SVBM”); Block Vision of Texas, Inc. d/b/a/ Superior Vision of Texas (“SVT”); Superior Vision of New Jersey, Inc. (“SVNJ”); UVC Independent Practice Association, Inc. (“UVC”); Superior Vision Insurance Plan of Wisconsin, Inc. (“SVIP”); and Vision 21 Managed Eye Care of Tampa Bay, Inc. d/b/a/ Eye Specialists (“Eye Specialists”), Davis Vision Inc. (“DVI”) and Davis Vision IPA (DVIPA). For purposes hereof, Versant Health Inc. and its subsidiaries may be collectively referred to as the “Company”.

Program Purpose

The Company adheres to its core values; specifically, in regard to respect and value human differences, inclusion of diverse talents, ideas and abilities that contribute to the achievement of business goals and equity for all employees, patients, members, and clients. The Cultural and Linguistic Program (CLP) is developed to support these values as well as provide infrastructure to meet the diverse cultural and linguistic needs of our members, clients, network providers and employees including, but not limited to:

- People with limited English proficiency (LEP), which would include members whose primary language is a language other than English, as well as native English speakers who are not fully literate and/or health literate.
- People with disabilities or cognitive impairments that affect communication abilities and their use and access to health services
- People whose cultural beliefs about health are different from the dominant culture

The organization embrace the National CLAS standards and infuse those principles into our Cultural and Linguistic Program (CLP). To demonstrate this commitment, our Program Description is embedded into the definitions of each CLAS Standard, which then provides a road map to guide successful implementation of the standards.

Work Plan activities are outlined in the Exhibits B and C at the end of this document.

CLAS 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.

Considered the “Principal Standard”, this is the overarching element that is foundational to a strong Cultural Linguistic Program. The Company has structured processes, training and services to align with this standard and is more closely outlined in Standards 2 through 15.

CLAS STANDARD 2

Advance and sustain organizational governance and leadership that promotes CLAS and health equity through policy, practices, and allocated resources.

Administrative oversight of activities is executed by the Director of Quality, who reports to the SVP of Operations. Oversight of processes are monitored by the Quality Improvement Committee (QIC).

The QIC annually approves the program and annual work plan activities using, at a minimum, the data generated by the work plan to drive recommendations for continuous improvement and corrective interventions as needed. The QIC then regularly communicates with the Executive Compliance Committee, which is directly reports to the Board of Directors.

CLAS STANDARD 3

Recruit, promote, and support a culturally and linguistically diverse governance, leadership, and workforce that are responsive to the population in the service area.

The Company is an Affirmative Action and Equal Employment Opportunity (EEO) employer, committed to a proactive program of affirmative action, diversity development and inclusion. The Company continues to recruit, hire, train, and promote into all job levels without regard to race, color, religious beliefs, age, sex (including pregnancy), sexual orientation, gender identity or expression (including transgender status), national origin, ancestry, status as a protected veteran or disabled veteran, physical or mental disability or history of disability, genetic information, marital status, or any and all other categories protected under applicable federal, state or local law. Support and belief in this principle is a basic responsibility of all Company associates.

As outlined in the Company’s EEO policies, this policy statement applies to all terms, conditions, and privileges of employment and all policies of the Company including:

- initial consideration for employment
- job placement and assignment of responsibilities
- performance evaluation
- promotion and advancement
- compensation and fringe benefits
- training and professional development opportunities
- formulation and application of human resource policies and rules
- facility and service accessibility
- reductions in force
- recall from layoff
- discipline and termination

Accordingly, all personnel actions, such as compensation, benefits, transfers, social and recreational programs, etc. will be administered without regard to protected status or any other basis prohibited by applicable law.

It is the Company's policy and practice that every employee has the right to work in an environment where each individual is treated with respect and dignity in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices. Consistent with this policy we are committed to maintaining a work environment that is free of discrimination, bias, prejudice and harassment.

Consistent with its Zero Tolerance Harassment policy, the Company does not accept, condone or tolerate harassment of its associates or applicants for employment by management personnel, co-workers, customers, outside business associates or visitors. This prohibition includes forms of harassment that violate state and federal laws, and forms of harassment that may not violate law, but which violate the organization's Human Resources policies because they are not conducive to creating a respectful work environment for our employees.

EEO POLICY COMMITMENTS

The Company's policy includes, without limitation, the following commitments:

1. To continue to provide equal employment opportunity to all qualified persons, and to recruit, hire, train, promote, and compensate persons in all jobs without regard to race, color, religious beliefs, age, sex (including pregnancy), sexual orientation, gender identity or expression (including transgender status), national origin, ancestry, status as a protected veteran or disabled veteran, physical or mental disability or history of disability, genetic information, marital status, or any and all other categories protected under applicable federal, state or local law. Support and belief in this principle is a basic responsibility of all Company associates.
2. To identify and analyze all areas of its employment process, so as to further the principles of equal employment opportunity. Employment decisions in all areas are made on the basis of furthering the objective of equal employment. Specific examples include:
RECRUITMENT AND SELECTION - In conformity with applicable law, the recruitment, testing, and hiring of all personnel will continue to be conducted without discrimination against any individual without regard to race, color, religious beliefs, age, sex (including pregnancy), sexual orientation, gender identity or expression (including transgender status), national origin, ancestry, status as a protected veteran or disabled veteran, physical or mental disability or history of disability, genetic information, marital status, or any and all other categories protected under applicable federal, state or local law. Support and belief in this principle is a basic responsibility of all Company associates... All employee selection criteria used by the Company conform to the Uniform Guidelines on Employee Selection Procedures 41 C.F.R. Part 60-3 (1978). Recruitment sources previously used to source minority and women potential applicants will continue to be contacted regularly so as to maximize the participation of such applicants.
PROMOTION – All employees will be given equal opportunity for promotion. Individuals will continue to be upgraded and promoted on the basis of their abilities, skills, and experience. The Company ensures that qualified minority and female employees are considered for promotion by offering counseling to assist employees in identifying promotional opportunities, training and educational programs to enhance promotions and opportunities for transfers in making promotion decisions and evaluating job requirements for promotion, supervisors directly involved, and other appropriate personnel will ensure that promotions are based on valid occupational qualifications.

TRANSFERS - When vacancies occur, the supervisor directly involved, and other appropriate personnel, will continue to make positive efforts to affect transfers of minority and female employees, particularly when such transfers will increase the likelihood of greater job opportunity in areas where minority and female employees may have been, or may now be, underutilized.

LAYOFFS - If reductions in the Company's workforce become necessary, they will be based on non-discriminatory policies. The Company will review those persons affected by the reductions to assure compliance with this policy and to ensure that minorities and women are treated in a non-discriminatory manner with respect to layoff and recall.

3. To administer personnel actions affecting employees in areas such as compensation, benefits, transfers, layoffs, returns from layoff, Company-sponsored training, education, and social and recreational programs, without regard to race, color, religious beliefs, age, sex (including pregnancy), sexual orientation, gender identity or expression (including transgender status), national origin, ancestry, status as a protected veteran or disabled veteran, physical or mental disability or history of disability, genetic information, marital status, or any and all other categories protected under applicable federal, state or local law. Support and belief in this principle is a basic responsibility of all Company associates. The Company periodically reviews personnel actions and collects data on a continuing basis for the purpose of monitoring such actions.
4. To promulgate and administer the Company's employee benefit plans, including pension, disability, and welfare insurance benefits, in conformity with the regulations of OFCCP, to the extent that such regulations are generally applicable and consistent with federal law. The Affirmative Action Officer meets periodically with appropriate management personnel to review the progress made and to develop alternatives if required. The AAP in its entirety is reviewed annually with appropriate management personnel.

Recruitment of providers into the Company's network is not based upon race, ethnicity, gender, age, or sexual orientation. We will collaborate with our client health plans to recruit providers in response to regulatory directive or requests based on specific population needs.

Our provider contracts include a non-discrimination clause, which outlines a provider's obligation to comply with non-discriminatory practices and to provide cultural and linguistically appropriated services as directed in the following regulations:

- General Prohibitions Against Discrimination (28 CRF 35.130)
- Title VI of the Civil Rights Act of 1964 (45 CRF 84)
- The Age Discrimination Act of 1975 (45 CFR 91)
- The Rehabilitation Act of 1973
- The Americans with Disabilities Act (28 CRF 35.101)
- Title VI Prohibition Against National Origin Affecting Limited English Proficient Persons
- 42 CFR 438.206(c)(2) Availability of Services
- 42 CFR 422.110 Discrimination Against Beneficiaries

CLAS STANDARD 4

Educate and train governance, leadership, and workforce in culturally and linguistically appropriate policies and practices on an ongoing basis.

The Company is committed to promoting cultural competency throughout all levels of its organization by offering standardized training to all internal employees. See Exhibit B for list of current training modules/guidance.

Network providers are encouraged to complete a continuing education course offered by the Office of Minority Health (OMH). Upon completion, providers can submit the documentation as proof of completion. This data is then captured into provider directories, identifying completion of the course.

CLAS STANDARD 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.

We provide members and network providers accessibility to free, alternate communication services for limited English Proficiency (LEP), deaf, hard of hearing, speech impaired and visually impaired members. We ensure that these services are offered free-of-charge.

1. Interpreter Services:

Services are available in threshold languages set out by the Department of Health and Human Services. All state threshold languages have been aggregated and are available upon demand through a contracted interpreter service vendor, free of charge to members and providers.

Members and network providers, which are assisting members with alternate communication needs, can access interpreter services by contacting the Company's Contact Centers' toll-free number(s) Monday to Friday 8:00 a.m. to 11:00 p.m. (EST); Saturday 9:00 a.m. to 4:00 p.m. (EST) and Sunday 12:00 p.m. to 4:00pm (EST). Language interpretation services can be accessed at the time of the initial call and also scheduled prior to making out-going calls to a member.

Network providers are encouraged to contact the Company at least seven (7) days in advance to schedule interpreter services; however, services will be secured on demand if necessary.

2. Hearing/Speech Impaired Services:

Text Telephone (TTY) services are available via a dedicated TTY.

3. Visually Impaired Services:

Member-facing materials are available in Braille for members upon request by calling the Company's Contact Center toll free number. If necessary, members may also request to have documents produced into large print. (Large print = 18 pt. font).

4. Translation of Vital Written Member-Facing Communications

Vital member materials will be translated via a translation vendor upon request or issued in specific threshold languages if the Company is required to comply with regulatory or contractual requirements, as applicable. See Exhibit B for the current list of vital documents.

5. Website

As a requirement, the website is regularly tested for compliance with accessibility standards outlined in Section 508 of the Rehabilitation Act of 1973. The website is therefore designed to:

- Offer variable text-size options
- Include language assistance and TTY availability notifications in 64 HHS-identified threshold languages

CLAS STANDARD 6

Inform all individuals of availability of language assistance services clearly and in their preferred language, verbally and in writing.

The Company ensures that members are fully aware of their ability to obtain communication assistance before and after engagement with the organization and network. Avenues in which individuals can receive notification regarding alternate communication assistance are as follows:

1. At a minimum, all member-facing vital documents (Exhibit A) advise of the availability of alternative communication options and how to receive them. This requirement is expanded to include additional notification in HHS threshold languages for those client memberships that fall under Section 1557 of the Title IV of the Civil Rights Act of 1964.
2. Contact Center associates are trained to identify and offer communication assistance during telephone engagements.
3. Websites are designed to include language assistance notifications in 64 languages, in addition to English.

CLAS STANDARD 7

Ensure the competence of individuals providing language assistance, recognizing that the use of untrained individuals and/or minors as interpreters should be avoided.

The use of family members and minors as interpreters are discouraged by member-facing service associates and network providers. Member-facing associates and network providers are directed to offer the current language interpretation/translation vendor(s) and document when language interpretation is refused by a member/patient.

Provider contracts clearly outline requirements regarding a provider's obligation to maintain procedures to ensure appropriate translation/interpretation services for members.

CLAS STANDARD 8

Provide easy-to-understand print and multimedia materials and signage in the languages commonly used by the population in the service area.

Vital member materials will generally be written in English at an 8th grade level (Flesch-Kincaid Grade Level Scoring Method) unless the specific needs of the population and/or regulatory requirements require a lower reading level.

Upon request, translations of vital documents will be issued based on contractual or regulatory requirements.

CLAS STANDARD 9

Establish culturally and linguistically appropriate goals, policies, and management accountability, and infuse them throughout the organization's planning and operations.

The Cultural and Linguistic Program goals and objectives are set forth as follows:

1. To create a structural framework that encourages:
 - leadership investment and support
 - recruitment of a diverse workforce
 - regular and consistent workforce training around cultural competency
2. To be responsive regarding legal, regulatory or accrediting requirements
3. To provide and communicate the free access to auxiliary aids and services along with language assistance to all members
4. To monitor the competence of individuals and vendors providing language and translation assistance
5. To ensure that member-facing communications are written in “plain English” and/or at grade-levels appropriate as needed to promote health literacy in low literacy populations
6. To promote engagement, continuous improvement and accountability by:
 - Infusing cultural competency throughout the organization's policies and operations
 - Conducting assessments for adherence and to promote continuous improvement via the Company's Quality Improvement Committee framework

- Collecting Company and client supplied demographic data and using it for continuous improvement
- Collaborating with clients to address the cultural and linguistic needs of its unique populations
- Establishing grievance resolution processes to resolve cultural and linguistic member challenges

The Cultural and Linguistic Program is monitored via the Quality Improvement Committee structure, which provides oversight, visibility to leadership, encourages continuous improvement and is used to initiate interventions as needed.

CLAS Standard 10

Conduct ongoing assessments of the organization's CLAS-related activities and integrate CLAS-related measures into measurement and continuous quality improvement activities.

At a minimum, activities involve:

1. Evaluation of cultural and linguistic activity reporting along with mixed-methods as needed to identify areas for intervention or continuous improvement (See Exhibit C). Findings and recommendations will be reported annually into the Quality Improvement Committee (QIC) for review and feedback.
2. Completion of an annual program evaluation and report of recommendations into the QIC. Evaluation will include but not limited to:
 - Trending of measures to assess performance and gaps regarding program efficacy
 - Review of program adequacy and staffing
 - Review adequacy of reporting structure
 - Identify needs to restructure the program as needed
 - Recommend at least one (1) continuous improvement activity that will be incorporated into the Quality Improvement Committee Annual Work Plan
3. Implement and/or incorporate all recommendations by the QIC into the Program as directed

CLAS STANDARD 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.

The Company monitors data collected from our interpretation and translating vendors, which is then analyzed and reported up to the Quality Improvement Committee. The data is then used in conjunction with utilization data to monitor areas of opportunity.

The Company will work collaboratively with client health plans to gather demographic data to address opportunities for specific member populations as needed and/or requested.

CLAS STANDARD 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.

As a national vendor for routine vision services, the Company is committed to working collaboratively with our client health plans to respond and implement services that adapt to the needs of client specific requirements for cultural and linguistic services.

CLAS STANDARD 13

Partner with the community to design, implement, and evaluate policies, practices and services to ensure cultural and linguistic appropriateness.

As a national vendor for routine vision services, the Company is committed to working collaboratively with our client health plans to implement services that adapt to the needs of client specific requirements for cultural and linguistic services.

CLAS STANDARD 14

Create conflict and grievance resolution processes that are culturally and linguistically appropriate to identify, prevent, and resolve conflicts or complaints.

Closely adhering to CLAS standards, the Company has created a complaint and grievance program, which enables easy access to complaint resolution processes for both members and providers. The program has been designed to:

1. Address regulatory requirements at the federal, state, and contractual level
2. Provide a dedicated department to efficiently investigate and resolve challenges
3. Incorporate a dedicated database to track and report complaint data, specifically relating to cultural and linguistically appropriate services and/or discrimination challenges.
4. Provide analysis that is communicated to the Quality Improvement Committee for intervention monitoring or continuous improvement promotion.

CLAS STANDARD 15

Communicate the organization's progress in implementing and sustaining CLAS to all stakeholders, constituents, and the general public.

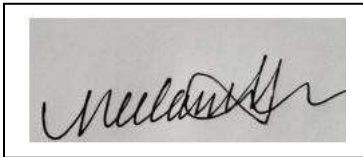
Annual review and evaluation of the Cultural and Linguistic Program is shared with the Quality Improvement Committee, which in turn communicates directly with the corporate Compliance Committee and ultimately to the Board of Directors. The annual evaluation is then available to clients and providers upon request.

QI Committee Approval:

Approved by Quality Improvement Committee ☒

Date Approved: 3/23/2022

Quality Improvement Committee Chair Signature

A rectangular box containing a handwritten signature in black ink. The signature is cursive and appears to read "Neelam Gor".

Co-chair: Dr. Neelam Gor. Chief Clinical Officer

Date Signed 3/23/2022

Exhibit A: Member-Facing Vital Documents

Department	Vital Document
Utilization Review	Denial Notices
Utilization Review	Approval Notices
Utilization Review	Request for Additional Information
Utilization Review	Notice of Extension of Timeframe
Utilization Review	Clinical Criteria Request Cover Letter
Complaints & Appeals	Acknowledgement Notices
Complaints & Appeals	Approval Notices
Complaints & Appeals	Resolution / Denial Notices
Complaints & Appeals	Extension of Timeframe Notices
Complaints & Appeals	Request for Additional Information
Claims	Direct Member Reimbursement Form
Claims	Denial Notices
Claims	Explanation of Benefits (EOB)
Privacy	Disclosure Accounting Request
Privacy	Authorization for Disclosure of PHI
Privacy	Request for Confidential Communications
Privacy	Personal Representative Designation
Network Operations	Provider Directory
Contact Service	Personalized Provider Listings
Documentation	Member Handbook

Exhibit B – Cultural Competency Training

Training	Method	Audience	Frequency
Code of Conduct	Training Module	Company Associates – all levels	New Hire and Annually thereafter
Harassment Prevention	Training Module	Company Associates – all levels	New Hire and Annually thereafter
Cultural and Linguistic Competency	Training Module	Company Member-facing Associates only	New Hire and Annually thereafter
Cultural and Linguistic Program Overview	Quality Management Annual Evaluation	Company – Leadership Team via Quality Management	Annually
Language Interpreting Services, Non-Discrimination Policy, Cultural Competency/Sensitivity Policy	Provider Manual	Network Providers	Annually

Exhibit C - 2022 Work Plan

Process	Measurement Frequency
Provider C&L Training Report	Annually
Provider Language Assistance Availability Report	Annually
Complaint Data	Annually
Language Line Interpreter Services Statistics by volume and language type	Annually
Document Translation Request Statistics by volume and language type	Annually

Cultural Competency Training Attestations	Annually
Member Website Adherence with Section-508-Of-The-Rehabilitation-Act and WCAG 2.0 standards Attestation	Annually
Verify CLAS Standards for Program Revision as necessary	Annually
Annual Evaluation of Program Communicated to QIC along with Recommendation of QI Activity for upcoming year	Annually