2021
Cultural Competency Plan
Introduction

South Florida Community Care Network Dba Community Care Plan (CCP) is a partnership between Broward Health (BH) (aka North Broward Hospital District) and the Memorial Healthcare System (MHS). These two health systems serve a diverse, multi-cultural population in Broward County. CCP is committed to provide safe, quality, cost-effective, patient and family centered care, with the goal of improving the health of the Florida Healthy Kids (FHK) population it serves.

It is for this reason that the CCP has committed to develop a system that can effectively provide services to people of all cultures, races, ethnic backgrounds, and religions in a manner that recognizes values, affirms, and respects the worth of the individual enrollees and protects and preserves the dignity of each. We believe that by addressing the cultural and linguistic needs of our enrollees, it will improve access to care, quality of care and ultimately, health outcomes. This will be done through the development of a Cultural Competency Plan as well as an evaluation tool to determine if implementation of the plan is effective.

Cultural Competence

Cultural Competence is the willingness and ability of a health care plan to value the importance of culture, ethnicity, gender, race and religion in the delivery of holistically delivered services which enables them to work effectively across different cultures. It is the use of a systems perspective which values differences and is responsive to diversity at all levels of the health plan. Cultural competence requires a comprehensive and coordinated plan that includes interventions on levels of policy making, infra-structure, program administration and evaluation, the delivery of services and the population it serves. It is the promotion of quality services to people who are underserved, or in any way subject to stigma in the community through the valuing of differences and the integration of cultural attitudes, beliefs, and practices into diagnostic and treatment methods. It should be practiced throughout the health plan to support the delivery of culturally relevant and competent care.

One aspect of cultural competence must also be the consideration of treatment in a holistic manner that does not allow stigma. Therefore, it deserves mention that CCP views care as being inclusive of all behavioral aspects of treatment from expected reactions to health problems and non-addictive substance use, to severe mental illness and problematic substance use. Considering the contract population, the presence of these issues in caregivers must also be monitored. Care is most culturally competent when any potential barriers are identified and addressed without judgment.
Cultural competency skills can be developed through the training of staff and providers. It also includes implementation of objectives to ensure that administrative policies and practices are responsive to the culture and diversity within the populations served. It is a process of continuous quality improvement.

The below excerpt demonstrates the need for culturally competent care in the healthcare system:

**Importance of Cultural influence**

Cultural differences affect patients’ attitudes about medical care and their ability to understand, manage, and cope with the course of an illness, the meaning of a diagnosis, and the consequences of medical treatment. Patients and their families bring culture specific ideas and values related to concepts of health and illness, reporting of symptoms, expectations for how health care will be delivered, and beliefs concerning medication and treatments. In addition, culture specific values influence patient roles and expectations, how much information about illness and treatment is desired, how death and dying will be managed, bereavement patterns, gender and family roles, and processes for decision making.

Many African-Americans participate in a culture that centers on the importance of family and church. There are extended kinship bonds with grandparents, aunts, uncles, cousins, or individuals who are not biologically related but who play an important role in the family system. Usually, a key family member is consulted for important health-related decisions. The church is an important support system for many African-Americans.

Although Hispanics share a strong heritage that includes family and religion, each subgroup of the Hispanic population has distinct cultural beliefs and customs. Older family members and other relatives are respected and are often consulted on important matters involving health and illness. Fatalistic views are shared by many Hispanic patients who view illness as God’s will or divine punishment brought about by previous or current sinful behavior. Hispanic patients may prefer to use home remedies and may consult a folk healer, known as a curandero.

As cultural competence is a concept that goes beyond race and ethnicity and includes all factors that can create stigma, in addition to general behavioral issues we must also consider the impact of gender and sexual identity issues. At all levels of treatment, these issues have begun to be recognized and addressed. Problems with emotions, behavior and substance use are already notable problems with youth covered by this FHKC, as is suicide. However, within this cultural competency lens, CCP also must consider the added factors that are posed by gender and sexual orientation disparities and the associated stigma on health outcomes. Consider the following statistics on LGBTQ (lesbian, gay, bi-sexual, transsexual, and questioning) children: 

1
These kids are 3x more likely than ‘straight’ kids to attempt suicide at some point in their lives
Medically serious attempts are 4x as likely that attempts made by ‘straight’ children
If these children come from families that don’t accept their sexual or gender identification, they are 8x more likely to attempt suicide than those accepted by their families
Each time a LGBTQ person is a victim of verbal of physical harassment or violence, they become 2.5x more likely to hurt themselves
Internet searches on LGBTQ and healthcare reveal volumes of data on how these issues have created health care disparities in everything from primary care to oncology

These factors have contributed to CCP’s expanded view of the term cultural competence and our approach to addressing it.

**Purpose**

CCP has developed a Cultural Competency Plan to ensure that its enrollees are receiving services delivered in a culturally and linguistically sensitive manner. The plan is comprehensive and incorporates all enrollees, Providers, and all CCP staff, including Enrollee Services, Case/Disease Management, Provider Relations, Grievance and Appeals, Utilization Management, and Quality Improvement. CCP recognizes that respecting the diversity of our enrollees has a tremendous and positive impact on outcomes of care. CCP has incorporated the Cultural and Linguistically Appropriate Services (CLAS) standards developed by the U.S. Department of Health & Human Services, Office of Minority Health, as our guidelines for furnishing culturally competent services. The CLAS standards are listed below:

**Principal Standards**

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 organizations’ planning and operations.

10) Conduct ongoing assessments of the organization’s CLAS-related activities and integrate CLAS-related measures into assessment 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.

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 general public.

(must copy and paste into browser to activate link)
CCP MISSION:
CCP is driven by our community responsibility to positively impact the health and wellness of those we serve.

CCP VISION:
CCP will be the vehicle for population health for Broward County.

WITH ROOTS IN OUR COMMUNITY:
CCP is owned by the Broward Health and Memorial Healthcare System. Each has a long history of helping to make sure that everyone gets the right care, at the right time, in the right place. CCP was launched in 2000 as the first safety-net hospital-owned Provider Service Network.

CCP Goals

Goal 1: Ensure that services are provided in a culturally competent manner to all enrollees, including those with limited English proficiency, whether at the CCP level, or the provider level through the evaluation of enrollee grievance, cross-culture complaints report, and enrollee satisfaction survey results on cultural competency.

Goal 2: CCP staff, contracted/employed Providers, and systems can effectively provide services to all people regardless of their ages, cultures, races, ethnicities, and religions.
- Review the demographic profiles of the service areas (Refer to page 6-7 – Data Analysis)
- Review number of providers with language spoken other than English
- Provide Member Services in three languages: English, Spanish, and Creole

Goal 3: CCP leadership will ensure that annual competency training be completed by all employed staff. Competency training will be conducted by Provider Operations during practitioner/provider orientation. The CCP Competency Plan with links to sites for practitioner/provider staff ongoing training is posted on the CCP website.

Goal 4: CCP will complete an annual evaluation of the effectiveness of the Cultural Competency Plan. CCP will track and trend any issues identified in the evaluation and implement interventions to improve the provision of services. The analysis of the results, interventions to be implemented and a description of the evaluation will be described in the annual CCP evaluation.

CCP will provide high quality, culturally sensitive services by identification, delivery and continual monitoring of enrollees’ needs. CCP hires bilingual staff and provides cultural competency training at orientation and annually after hired. CCP Quality Improvement Teams will continuously monitor and evaluate the level of cultural competency through medical services provided by its Provider Network. CCP will develop programs for improving cultural awareness, where a need is identified, through the comprehensive assessment of the Provider Services Network evaluation process. Our aim is to increase the Providers’ and Staffs’
awareness and appreciation of customs, values and beliefs, and the ability to incorporate them into the assessment of, treatment of, and interaction with enrollees. The CCP strongly entreats its Providers and Staff to share or utilize their own cultural diversity to improve the services provided to our enrollees.

*If Provider would like to request a copy of the Cultural Competency Plan, please call 1-866-930-0944 or download a copy at [www.ccpcares.org](http://www.ccpcares.org).*

**Objectives**

- To educate providers of their responsibility to provide competent health care that is culturally and linguistically sensitive. Expect providers to be knowledgeable about their patient’s culture, and cultural barriers and use this information in treatment. Expect providers to ask questions relevant to how the family and culture values might influence how the patient deals with being sick.

- To provide enrollees access to quality health care services that is culturally and linguistically sensitive. To offer enrollees a choice of providers with cultural and linguistic expertise.

- To identify enrollees with cultural and/or linguistic needs through demographic information and enrollee expressed wishes. Empower enrollees by allowing them to influence how the system will meet their needs, expecting the enrollees to be socially responsible and accountable.

- To provide competent translation services to enrollees who require these services. Provide Enrollee Services in predominant area languages, such as Spanish and Creole.

- To provide enrollees with Limited English Proficiency the assistance they need to understand the care being provided and to accomplish effective interactions with their health care providers. Encourage providers to listen to the enrollees’ opinions in considering treatment options. Utilize CCP social workers to provide in home assessment of needs.

**Delivery of Care and Services**

CCP has staff available to meet the cultural and linguistic needs of its populations. These staff members provide culturally sensitive information and the linguistic skills required for meeting the needs of enrollees. If staff is not available for a non-prevalent language, outside interpretation services are used to meet the need of the individual enrollee. CCP utilizes a complaint type for the Enrollee Services Department; the complaint type captures complaints relating to cross-culture issues, which will be referred to the Quality Improvement Department.
for review, to be addressed appropriately. CCP educates its practitioners/providers on the availability of interpretation services as well.

CCP Provider Credentialing Applications also capture the capacity to recruit providers of diverse racial and ethnic background by documenting the provider’s self-identified ethnicity, culture and race (if provided). The Application also includes a question about other languages spoken by providers to indicate their linguistic diversity – this information is used in the provider directory for informational purposes to enrollees.

This information is available via the CCP website and is updated weekly. CCP monitors the delivery of care and services in relation to the provision of culturally competent services through a comprehensive set of Quality Methods that includes, but is not limited to, Performance Improvement Plans, Medical Record Reviews, Enrollee Satisfaction Surveys and Provider Satisfaction Surveys.

**Education and Training**

CCP and its staff, and employed practitioners are required upon hire, and annually thereafter, to complete Diversity and Cultural Competency Training. Contracted Providers’ offices will be responsible for providing cultural competency training for all office personnel and staff.

CCP provides training materials for all network Providers at no cost to the provider. The training material will include ideas and assistance about how to provide care in a culturally competent manner.

Providers can access educational materials through the following websites:

(Must copy and paste into browser to activate link)

- Physician’s Practical Guide: [https://cccm.thinkculturalhealth.hhs.gov](https://cccm.thinkculturalhealth.hhs.gov)
- Provider’s Guide to Quality and Culture [http://erc.msh.org/mainpage.cfm?file=1.0.htm&module=provider&language=English](http://erc.msh.org/mainpage.cfm?file=1.0.htm&module=provider&language=English)

**Translation Services**

Addressing language access issues requires multi-faceted strategies. CCP’s first contact with the enrollee begins with the Welcome Letter. CCP sends mailings in English and Spanish, the
prevalent languages in Broward, Indian River, Martin, Miami-Dade, Monroe, Okeechobee, Palm Beach, and St. Lucie County with a special adage that states that materials are available in other languages or formats if needed. Translations needed in a language or format other than those prevalent in the area are provided based on the individual enrollee’s needs. The CCP utilizes bilingual staff and interpreter phone service to facilitate communication with non-English speakers. The interpreter phone service is a secondary language access service that allows the health plan to communicate with those non-English, non-Spanish, or non-Creole enrollees. CCP uses the following interpreter phone service vendors listed below:

- Optimal Phone Interpreters (1-877-746-4674)
- Language Line Services (1-866-874-3972)

The Spanish and Creole languages and cultures are the most prevalent in the CCP service area currently. We ensure our Enrollee Services representatives are able to communicate with the enrollees in English, Spanish, and Creole.

Some websites available to the CCP as well CCP providers with translation services, include but are not limited to:

- U.S. Census Bureau developed an “I Speak” document that has the following statement in 38 languages: “Mark this box if you read or speak (language).”
  http://www.justice.gov/crt/about/cor/Pubs/ISpeakCards.pdf
• The Florida Agency for Workforce Innovation has a document that has the following statement in 21 languages: “If you do not speak English, or if you are deaf, hard of hearing, or sight impaired, you can have interpreter and translation services provided at no charge. Please ask for assistance.”

  http://www.floridajobs.org/PDG/PostersforEmployers/IS%20Poster%2011x17.pdf

• Online resource that provides an index to more than 6,900 known living languages

  http://www.ethnologue.com/web.asp

Evaluation and Assessment

CCP completes an annual evaluation of the effectiveness of its Cultural Competency Plan. Results of this evaluation are used to determine the future direction of the Cultural Competency Plan. This evaluation may include results from the Enrollee Satisfaction Surveys, Enrollee Grievances, Enrollee Appeals, Provider feedback, Medical Record Reviews, Performance Improvement Plans, Performance Measures and CCP employee surveys. The CCP Quality Improvement Department tracks and trends any issues the number of cross-cultural complaints and cross-cultural grievance or appeal cases identified in the evaluation and implement interventions to improve the provision of culturally competent services if needed.

In the last twelve months, CCP received no grievances due to dissatisfaction with health care providers care or their staff regarding health care disparities, treatment with respect, or relationship.

Linguistics and Ethnicity

Below is the linguistic and ethnic demographics of people ages 5 and Over for CCP’s Florida Healthy Kids Counties, based on the U.S. Census Bureau’s American Community Survey (2013-2017):

Broward
  • Language spoken at home
    o English only – 60.0%
    o Language other than English – 40.0%
      ▪ Speaks English less than ‘very well’ – 15.9%
      ▪ Speaks Spanish – 25.3%
      • Speaks English less than ‘very well’ – 40.0%
  • Hispanic or Latino (of any race) – 28.40%
Indian River
- Language spoken at home
  o English only – 86.4%
  o Language other than English – 13.6%
    ▪ Speaks English less than ‘very well’ – 5.2%
    ▪ Speaks Spanish – 9.5%
  • Speaks English less than ‘very well’ – 39.3%
- Hispanic or Latino (of any race) – 12.1%

Martin
- Language spoken at home
  o English only – 86.2%
  o Language other than English – 13.8%
    ▪ Speaks English less than ‘very well’ – 6.0%
    ▪ Speaks Spanish – 9.5%
  • Speaks English less than ‘very well’ – 47.9%
- Hispanic or Latino (of any race) – 13.2%

Miami-Dade
- Language spoken at home
  o English only – 26.2%
  o Language other than English – 73.8%
    ▪ Speaks English less than ‘very well’ – 35.1%
    ▪ Speaks Spanish – 65.3%
  • Speaks English less than ‘very well’ – 48.8%
- Hispanic or Latino (of any race) – 67.5%

Monroe
- Language spoken at home
  o English only – 76.8%
  o Language other than English – 23.2%
    ▪ Speaks English less than ‘very well’ – 40.8%
    ▪ Speaks Spanish – 17.7%
  • Speaks English less than ‘very well’ – 44.1%
- Hispanic or Latino (of any race) – 23.5%

Okeechobee
- Language spoken at home
  o English only – 76.5%
  o Language other than English – 23.5%
    ▪ Speaks English less than ‘very well’ – 11.7%
    ▪ Speaks Spanish – 21.7%
  • Speaks English less than ‘very well’ – 51.5%
- Hispanic or Latino (of any race) – 25.00%
Palm Beach
- Language spoken at home
  - English only – 68.9%
  - Language other than English – 31.1%
    - Speaks English less than ‘very well’ – 13.0%
    - Speaks Spanish – 25.3%
  - Speaks English less than ‘very well’ – 41.8%
- Hispanic or Latino (of any race) – 21.3%

St. Lucie
- Language spoken at home
  - English only – 77.9%
  - Language other than English – 22.1%
    - Speaks English less than ‘very well’ – 9.0%
    - Speaks Spanish – 14.3%
  - Speaks English less than ‘very well’ – 44.0%
- Hispanic or Latino (of any race) – 18.1%

CCP Staff Languages

In 2019-2020, CCP employed 18 member services representatives including a Director. Of the 18 staff, 8 are bilingual (English and Spanish), 4 are bilingual (English and Creole) and 1 is trilingual (English, Spanish, and Creole).

CCP staff speaking Spanish equals 50% of the total employed in member services and Creole speaking staff equals 28% of the total staff, which far exceeds our own CCP membership and the County demographics displayed above, except for Miami-Dade (Spanish).
### CCP Practitioner Languages

<table>
<thead>
<tr>
<th>Language</th>
<th>Count of providers by Language</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hindi</td>
<td>1</td>
<td>0.01%</td>
</tr>
<tr>
<td>Arab</td>
<td>1</td>
<td>0.01%</td>
</tr>
<tr>
<td>Arabic</td>
<td>21</td>
<td>0.21%</td>
</tr>
<tr>
<td>ASL</td>
<td>2</td>
<td>0.02%</td>
</tr>
<tr>
<td>Bangla</td>
<td>1</td>
<td>0.01%</td>
</tr>
<tr>
<td>Bengali</td>
<td>3</td>
<td>0.03%</td>
</tr>
<tr>
<td>Cantonese</td>
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<td>0.01%</td>
</tr>
<tr>
<td>Chinese</td>
<td>21</td>
<td>0.21%</td>
</tr>
<tr>
<td>Dutch</td>
<td>1</td>
<td>0.01%</td>
</tr>
<tr>
<td>English</td>
<td>9915</td>
<td>100.00%</td>
</tr>
<tr>
<td>Farsi</td>
<td>3</td>
<td>0.03%</td>
</tr>
<tr>
<td>French</td>
<td>95</td>
<td>0.96%</td>
</tr>
<tr>
<td>French Creole</td>
<td>192</td>
<td>1.94%</td>
</tr>
<tr>
<td>German</td>
<td>10</td>
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</tr>
<tr>
<td>Greek</td>
<td>3</td>
<td>0.03%</td>
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<tr>
<td>Gujarati</td>
<td>4</td>
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</tr>
<tr>
<td>Hebrew</td>
<td>41</td>
<td>0.41%</td>
</tr>
<tr>
<td>Hindi</td>
<td>28</td>
<td>0.28%</td>
</tr>
<tr>
<td>Hungarian</td>
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<td>0.02%</td>
</tr>
<tr>
<td>Italian</td>
<td>14</td>
<td>0.14%</td>
</tr>
<tr>
<td>Japanese</td>
<td>12</td>
<td>0.12%</td>
</tr>
<tr>
<td>Latin</td>
<td>1</td>
<td>0.01%</td>
</tr>
<tr>
<td>Macedonian</td>
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<td>0.01%</td>
</tr>
<tr>
<td>Malayalam</td>
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<td>Malayan</td>
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<tr>
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<tr>
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<td>0.01%</td>
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<tr>
<td>Ukrainian</td>
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<td>0.02%</td>
</tr>
<tr>
<td>Urdu</td>
<td>7</td>
<td>0.07%</td>
</tr>
<tr>
<td>Language</td>
<td>Count of providers by Language</td>
<td>Percentage</td>
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<td>------------</td>
<td>-------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>3</td>
<td>0.03%</td>
</tr>
<tr>
<td>Yiddish</td>
<td>5</td>
<td>0.05%</td>
</tr>
<tr>
<td>Zisayan</td>
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<td>0.01%</td>
</tr>
<tr>
<td>Total</td>
<td>9915</td>
<td>100.00%</td>
</tr>
</tbody>
</table>

**EDUCATION**

As important as language in a multi-cultural population is the understanding of how cultural impacts the medical care of a member. To that end, in 2019-2020, CCP has held Motivational Interviewing programs for case and disease managers. Motivational Interviewing is designed around the following principles:

1. Drawing Out, Rather Than Imposing Ideas (member’s own skill for change)
2. Autonomy versus Authority (empowering member)
3. Express Empathy (see through member’s eyes)
4. Support Self-Efficacy

All newly hired employees, as part of their orientation to CCP, attend a Cultural Diversity Class. Annually all employees attend “Diversity, Inclusion & You” workshop. This hour and a half workshop is mandatory and covers the value of diversity and the multicultural society in which we live. Participants are expected to enhance their appreciation of diversity, renew a commitment to avoid use of stereotypes and assumptions and strengthen competence in diversity and inclusion. To date, all staff have had training.

CCP continues to educate the vast provider network during orientation, provider newsletters, and postings on the CCP web page. On the web page, providers can find the entire Cultural Competency Plan.

**SATISFACTION / MEMBER EXPERIENCE**

For 2021, CCP will continue to monitor:

- Enrollee complaints regarding discrimination or language/ethnic/religious needs monthly
- Enrollee satisfaction annually through the CAHPS survey and monthly ad hoc surveys
- Enrollee language needs through language requests
- Training needs about cultural disparities of our practitioner/provider network
- Practitioner demographics regarding language, race, ethnicity to meet our enrollees’ needs
- Claims data to identify health disparities
Websites/resources for additional information:

www11.georgetown.edu/research/gucchd/nccf/features/CCHPA.html
www.peacecorps.gov/wws/educators/enrichment/culturematters/index.html
www.emstac.org/resources/disproportionality.htm
www.edchange.org/multicultural/
www.clas.uiuc.edu/
http://ericae.net/faqs/Cognitive_Styles/ericbib_inventoryvalidity.htm
http://minorityhealth.hhs.gov/templates/browse.aspx?lvl=1&lvlid=3
www.npsf.org/for-healthcare-professionals/programs/ask-me-3/
www.ahip.org/disparities/QIModules/
www.samhsa.gov/
www.nimh.nih.gov/index.shtml
www.nami.org/Home