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CCCCF commits to embracing, implementing and practicing the National Standards for Culturally and Linguistically Appropriate Services in Health and Health Care: A Blueprint for Advancing and Sustaining CLAS Policy and Practice (As offered by the Office of Minority Health U.S. Department of Health and Human Services) dated April 2013.

CCCCF adopts these principles as part of our Policy & Procedures Manual as of July 2013. Every reasonable effort will be made to implement and achieve these principles.

Standard 1: Provide Effective, Equitable, Understandable, and Respectful Quality Care and Services

Standard 1

The National CLAS Standards are intended to advance health equity, improve quality, and help eliminate health care disparities by establishing a blueprint for health and health care organizations to:

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.

Purpose

- o To create a safe and welcoming environment at every point of contact that both fosters appreciation of the diversity of individuals and provides patient- and family-centered care
- o To ensure that all individuals receiving health care and services experience culturally and linguistically appropriate encounters
- o To meet communication needs so that individuals understand the health care and services they are receiving, can participate effectively in their own care, and make informed decisions

- o To eliminate discrimination and disparities

Strategies for Achievement of the Principal Standard

Standard 1 is the Principal Standard because, conceptually, the ultimate aim in adopting the remaining Standards is to achieve Standard 1. Standards 2 through 15 represent the practices and policies intended to be the fundamental building blocks of culturally and linguistically appropriate services that are necessary to achieve the Principal Standard. For this reason, Strategies for Implementation specific to Standard 1 are not listed here. If each of Standards 2 through 15 is implemented and maintained, organizations will be better positioned to achieve the desired goal of “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.”

Standard 2: Advance and Sustain Governance and Leadership that Promotes CLAS and Health Equity

Standard 2

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

Purpose

- o To ensure the provision of appropriate resources and accountability needed to support and sustain initiatives
- o To model an appreciation and respect for diversity, inclusiveness, and all beliefs and practices
- o To support a model of transparency and communication between the service setting and the populations that it serves

Strategies for Implementation

- o Create and sustain an environment of cultural competency through establishing leadership structures and systems or embedding them into existing structures and systems
- o Identify and develop informed and committed champions of cultural competency throughout the organization in order to focus efforts around providing culturally competent care
- o Ensure that a commitment to culturally competent care is reflected in the vision, goals, and mission of the organization and couple this with an actionable plan
- o Implement strategies to recruit, retain, and promote at all levels of the organization a diverse leadership that reflects the demographic characteristics of

the populations in the service area

- o Ensure that the necessary fiscal and human resources, tools, skills, and knowledge to support and improve culturally competent policies and practices in the organization are available
- o Commit to cultural competency through system-wide approaches that are articulated through written policies, practices, procedures, and programs
- o Actively seek strategies to improve the knowledge and skills that are needed to address cultural competency in the organization

Standard 3: Recruit, Promote, and Support a Diverse Governance, Leadership, and Workforce

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

Purpose

- o To create an environment in which culturally diverse individuals feel welcomed and valued
- o To promote trust and engagement with the communities and populations served
- o To infuse multicultural perspectives into planning, design, and implementation of CLAS
- o To ensure diverse viewpoints are represented in governance decisions
- o To increase knowledge and experience related to culture and language among staff

Strategies for Implementation

The following are possible implementation strategies for the recruitment, promotion, and support of a diverse governance, leadership, and workforce:

Recruitment

- o Advertise job opportunities in targeted foreign language and minority health professional associations' job boards, publications, and other media (e.g., social media networks, professional organizations' email Listservs, etc
- o Develop relationships with local schools, training programs, and faith-based organizations to expand recruitment base

- o Collaborate with businesses, public school systems, and other stakeholders to build potential workforce capacities and recruit diverse staff. In particular, linkages between academic and service settings can help identify potential recruits already in the educational “pipeline” and provide them with additional academic support and resources necessary to meet job requirements

- o Assess the language and communication proficiency of staff to determine fluency and appropriateness for serving as interpreters

Promotion and Support

- o Create a work environment that respects and accommodates the cultural diversity of the local workforce

- o Develop, maintain, and promote continuing education and career development opportunities so all staff members may progress within the organization

- o Cultivate relationships with organizations and institutions that offer health and human service career training to support internship programs

- o Conduct regular explicit assessments of hiring and retention data, current workforce demographics, promotion demographics, and community demographics

- o Monitor work assignments and hire sufficient personnel to ensure a manageable and appropriate workload for bilingual/bicultural staff members

- o Promote diverse staff members into administrative or managerial positions where their cultural and linguistic capabilities can make unique contributions to planning, policy, and decision-making

- o Foster an environment in which differences are respected and that is responsive to the challenges a culturally and linguistically diverse staff brings into the workplace

Standard 4: Educate and Train Governance, Leadership, and Workforce in CLAS

Standard 4

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

Purpose

- o To prepare and support a workforce that demonstrates the attitudes, knowledge, and skills necessary to work effectively with diverse populations

- o To increase the capacity of staff to provide services that are culturally and

linguistically appropriate

- o To assess the progress of staff in developing cultural, linguistic, and health literacy competency
- o To foster an individual's right to respect and nondiscrimination by developing and implementing education and training programs that address the impact of culture on health and health care

Strategies for Implementation

- o Engage staff in dialogues about meeting the needs of diverse populations
- o Provide ongoing in-service training on ways to meet the unique needs of the population, including regular in-services on how and when to access language services for individuals with limited English proficiency
- o Take advantage of internal and external resources available to educate governance, leadership, and workforce on cultural beliefs they may encounter
- o Allocate resources to train current staff in cultural competency
- o Incorporate cultural competency and CLAS into staff evaluations
- o Provide opportunities for CLAS training that include regular in-services, brown-bag lunch series, orientation materials for new staff, and annual update meetings
- o Take advantage of live and Web-based health disparities and cultural competency continuing education programs for clinicians and practitioners

Standard 5: Offer Communication and Language Assistance

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.

Purpose

- o To ensure that individuals with limited English proficiency and/or other communication needs have equitable access to health services
- o To help individuals understand their care and service options and participate in decisions regarding their health and health care
- o To increase individuals' satisfaction and adherence to care and services
- o To improve patient safety and reduce medical error related to miscommunication

o To help organizations comply with requirements such as Title VI of the Civil Rights Act of 1964; the Americans with Disabilities Act of 1990; and other relevant federal, state, and local requirements to which they may need to adhere

Strategies for Implementation

- o Ensure that staff is fully aware of, and trained in, the use of language assistance services, policies, and procedures
- o Develop processes for identifying the language(s) an individual speaks and for adding this information to that person's health record
- o Use qualified and trained interpreters to facilitate communication, including ensuring the quality of the language skills of self-reported bilingual staff who use their non-English language skills during patient encounters
- o Establish contracts with interpreter services for in-person, over-the-phone, and video remote interpreting
- o Use cultural brokers when an individual's cultural beliefs impact care communication
- o Provide resources onsite to facilitate communication for individuals who experience impairment due to a changing medical condition or status (e.g., augmentative and alternative communication resources or auxiliary aids and services)

Standard 6: Inform Individuals of the Availability of Language Assistance

Standard 6

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

Purpose

- o To inform individuals with limited English proficiency, in their preferred language, that language services are readily available at no cost to them
- o To facilitate access to language services
- o To help organizations comply with requirements such as Title VI of the Civil Rights Act of 1964; the Americans with Disabilities Act of 1990; and other relevant federal, state, and local requirements to which they may need to adhere

Strategies for Implementation

- o Determine the content and language of notices
- o Decide how to communicate or provide notice to individuals

- o Decide where to provide notice to individuals about the availability of assistance
- o Notification should describe what communication and language assistance is available, in what languages the assistance is available, and to whom they are available. It should clearly state that communication and language assistance is provided by the organization free of charge to individuals
- o Notification should be easy to understand at a low literacy level
- o Signage, Materials, and Multimedia: Organizations should reflect the languages regularly encountered in the service area in their signs, materials, and multimedia resources. For those who may not be literate, information can be conveyed orally or through signage using symbols or pictures
- o Initial Point of Contact: It is recommended that organizations standardize procedures for staff members who serve as the initial point of contact for individuals, whether that is by telephone or in person. It may be appropriate to provide staff with a script to ensure that they inform individuals of the availability of language assistance and to inquire whether they will need to utilize any of the available services.

Standard 7: Ensure the Competence of Individuals Providing Language Assistance

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.

Purpose

- o To provide accurate and effective communication between individuals and providers
- o To reduce misunderstanding, dissatisfaction, omission of vital information, misdiagnoses, inappropriate treatment, and patient safety issues due to reliance on staff or individuals that lack interpreter training
- o To empower individuals to negotiate and advocate, on their own behalf, for important services via effective and accurate communication with health and health care staff
- o To help organizations comply with requirements such as Title VI of the Civil Rights Act of 1964; the Americans with Disabilities Act of 1990; and other relevant federal, state, and local requirements to which they may need to adhere

Strategies for Implementation

- o Assess the individual's language ability. There exist many options for testing an individual's ability to communicate in a foreign language.
- o Assess the individual's ability to provide language assistance. The American Translators Association upholds standards of practice for translation services.
- o Employ a "multifaceted model" of language assistance. Organizations may provide language assistance according to a variety of models, including bilingual staff or dedicated language assistance (e.g., a contract interpreter or video remote interpreting). A combination of models, or a multifaceted model, offers the organization a "comprehensive and flexible system [for] facilitating communication" Under a multifaceted model, for example, telephonic interpreting will supplement the language assistance provided by bilingual staff to ensure that at all times, language assistance is being provided by competent individuals.

Standard 8: Provide Easy-to-Understand Materials and Signage

Standard 8

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

Purpose

- o To ensure that readers of other languages and individuals with various health literacy levels are able to access care and services
- o To provide access to health-related information and facilitate comprehension of, and adherence to, instructions and health plan requirements
- o To enable all individuals to make informed decisions regarding their health and their care and services options
- o To offer an effective way to communicate with large numbers of people and supplement information provided orally by staff members
- o To help organizations comply with requirements such as Title VI of the Civil Rights Act of 1964; the Americans with Disabilities Act of 1990; and other relevant federal, state, and local requirements to which they may need to adhere

Strategies for Implementation

- o Issue plain language guidance and create documents that demonstrate best practices in clear communication and information design
- o Create forms that are easy to fill out, and offer assistance in completing forms

- o Train staff to develop and identify easy-to-understand materials, and establish processes for periodically re-evaluating and updating materials
- o Formalize processes for translating materials into languages other than English and for evaluating the quality of these translations

Standard 9: Infuse CLAS Goals, Policies, and Management Accountability Throughout the Organization's Planning and Operations

Standard 9

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

Purpose

- o To make CLAS central to the organization's service, administrative, and supportive functions
- o To integrate CLAS throughout the organization (including the mission) and highlight its importance through specific goals
- o To link CLAS to other organizational activities, including policy, procedures, and decision-making related to outcomes accountability

Strategies for Implementation

- o Engage the support of governance and leadership, and encourage the allocation of resources to support the development, implementation, and maintenance of culturally and linguistically appropriate services
- o Encourage governance and leadership to establish education and training requirements relating to culturally and linguistically appropriate services for all individuals in the organization, including themselves.
- o Establish accountability mechanisms throughout the organization, including staff evaluations, individuals' satisfaction measures, and quality improvement measures

Standard 10: Conduct Organizational Assessments

Standard 10

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

Purpose

- o To assess performance and monitor progress in implementing the National CLAS Standards
- o To obtain information about the organization and the people it serves, which can be used to tailor and improve services
- o To assess the value of CLAS-related activities relative to the fulfillment of governance, leadership, and workforce responsibilities

Strategies for Implementation

- o Conduct an organizational assessment or a cultural audit using existing cultural and linguistic competency assessment tools to inventory structural policies, procedures, and practices. These tools can provide guidance to determine whether the core structures and processes (e.g., management, governance, delivery systems, and customer relation functions) necessary for providing CLAS are in place.
- o Use results from assessments to identify assets (e.g., bilingual staff members), weaknesses (e.g., no translated signage or cultural competency training), and opportunities to improve the organization's structural framework and capacity to address cultural and linguistic competence in care (e.g., revise mission statement, recruit people from diverse cultures into policy and management positions)
- o Following the assessment, prepare adequate plans for developing CLAS (see Standard 9). Subsequent ongoing assessment helps organizations to monitor their progress in implementing the enhanced National CLAS Standards and to refine their strategic plans.
- o Implement ongoing organizational assessment of CLAS-related activities
- o Add CLAS-related questions to staff orientation materials and yearly reviews
- o Develop a system of reviewing and incorporating feedback and suggestions received and for monitoring their effect on CLAS implementation and outcomes
- o Identify outcome goals, including metrics, regarding cultural and linguistic competency and assess at regular intervals

Standard 11: Collect and Maintain Demographic Data

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.

Purpose

- o To accurately identify population groups within a service area
- o To monitor individual needs, access, utilization, quality of care, and outcome patterns
- o To ensure equal allocation of organizational resources
- o To improve service planning to enhance access and coordination of care
- o To assess and improve to what extent health care services are provided equitably

Strategies for Implementation

- o Collect demographic data

Standard 12: Conduct Assessments of Community Health Assets and Needs

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.

Purpose

- o To determine the service assets and needs of the populations in the service areas (needs assessment)
- o To identify all of the services available and not available to the populations in the service areas (resource inventory and gaps analysis)
- o To determine what services to provide and how to implement them, based on the results of the assessment
- o To ensure that health and health care organizations obtain demographic, cultural, linguistic, and epidemiological baseline data (quantitative and qualitative) and update the data regularly to better understand the populations in their service areas

Strategies for Implementation

- o Partner with other organizations to negotiate a data sharing agreement, which could facilitate the linking of different types of data.
- o Collaborate with other organizations and stakeholders in data collection, analysis, and reporting efforts to increase data reliability and validity

o Review demographic data collected with local health and health care organizations

Standard 13: Partner with the Community

Standard 13

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

Purpose

- o To provide responsive and appropriate service delivery to a community
- o To ensure that services are informed and guided by community interests, expertise, and needs
- o To increase use of services by engaging individuals and groups in the community in the design and improvement of services to meet their needs and desires
- o To create an organizational culture that leads to more responsive, efficient, and effective services and accountability to the community

Strategies for Implementation

- o Partner with local culturally diverse media to promote better understanding of available care and services and of appropriate routes for accessing services among all community members
- o Build coalitions with community partners to increase reach and impact in identifying and creating solutions. For example:
 - Work on joint steering committees and coalitions.
 - Sponsor or participate in health fairs, cultural festivals, and celebrations.
 - Offer education and training opportunities.
- o Develop opportunities for capacity building initiatives, action research, involvement in service development, and other activities to empower the community
- o Collaborate to reach more people, to share information and learn, and to improve services. Work with partners to advertise job openings, identify interpreting resources, and organize health promotion activities. Successful partnerships benefit all.

Standard 14: Create Conflict and Grievance Resolution Processes

Standard 14

The National CLAS Standards are intended to advance health equity, improve quality, and help eliminate health care disparities by establishing a blueprint for health and health care organizations

Purpose

- o To facilitate open and transparent two-way communication and feedback mechanisms between individuals and organizations
- o To anticipate, identify, and respond to cross-cultural needs
- o To meet federal and/or state level regulations that address topics such as grievance procedures, the use of ombudspersons, and discrimination policies and procedures

Strategies for Implementation

- o Provide cross-cultural communication training, including how to work with an interpreter, and conflict resolution training to staff who handle conflicts, complaints, and feedback.
- o Provide notice in signage, translated materials, and other media about the right of each individual to provide feedback, including the right to file a complaint or grievance
- o Develop a clear process to address instances of conflict and grievance that includes follow-up and ensures that the individual is contacted with a resolution and next steps
- o Include oversight of conflict and grievance resolution processes to ensure their cultural and linguistic appropriateness as part of the organization's overall quality assurance program

Standard 15: Communicate the Organization's Progress in Implementing and Sustaining CLAS

Standard 15

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

Purpose

- o To convey information to intended audiences about efforts and accomplishments in meeting the National CLAS Standards

o To learn from other organizations about new ideas and successful approaches to implementing the National CLAS Standards

o To build and sustain communication on CLAS priorities and foster trust between the community and the service setting

o To meet community benefits and other reporting requirements, including accountability for meeting health care objectives in addressing the needs of diverse individuals or groups

Strategies for Implementation

o Assessment results based on activities suggested from Standard 10, community data collected in accordance with Standard 12, and the number of complaints and their resolution as collected pursuant to Standard 14

o Results from performance measures, satisfaction ratings, quality improvement and clinical outcome data analyses, and cost-effectiveness analyses

o Distribute materials that demonstrate efforts to be culturally and linguistically responsive -the materials should be easy to understand and in accordance with Standard 8.

o Partner with community organizations to lead discussions about the services provided and progress made; see also Standard 13.

Respectfully submitted,

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