

Organizational (Standard 1)						
Objectives: 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.						
Objective	Action Steps	Assigned Parties	Measures	Completion Date	Status/ Progress Update	Identified Barriers/ Comments
1.1 Maintain Cultural Competency Committee (CCC) that remains informed of relevant business practices; creates, improves or innovates culturally relevant ideas within the company; and shares and communicates ideas and needs throughout all levels of the agency.	The CCC will consist of representation from each site/region within Southwest Network and include diverse representation from all levels of the organization. The CCC will meet at least quarterly to review objectives/progress and make adjustments to the Cultural Competency (CC) Plan as needed	Volunteer CCC members	Minutes and updates from CCC meetings	Meetings held ongoing on quarterly schedule	CCC met: 12/8/2017 @ Estrella Vista 02/23/2018 @ Mesa Heritage 05/11/2018 @ Central Valley	Adult direct care staff representation remains low on committee. Committee often meets at adult sites to encourage participation by adult staff.

2. Governance, Leadership, and Workforce (Standards 2, 3 and 4)
Objectives: Create and maintain culturally appropriate policies; Recruit and promote a diverse workforce; Provide continuing education and training in culturally and linguistically appropriate policies and practices.

Objective	Action Steps	Assigned Parties	Measures	Completion Date	Status/ Progress Update	Identified Barriers/Comments
2.1 It is the policy of Southwest Network to ensure that policies and procedures are culturally relevant, as well as in compliance with federal, state, AHCCCS and RBHA requirements. Policies are reviewed at least biennially.	Policies and procedures will be established, revised, and reviewed by the policy and forms committee in order to ensure they remain culturally relevant.	Policy and forms committee and/or other designees	Updated policies and/or procedures At least one member from CCC to inform updates to policies and forms	Ongoing	All policies and forms continue to be reviewed at a minimum of biennially.	
2.2 Southwest Network’s Human Resources (H.R.) department will partner with community resources to actively recruit members of the community who mirror our diverse demographics. The recruiting team will also identify and attend job fairs that attract a candidate pool that represents parity to our member population.	The recruiting team will send job opportunities to local diversity agencies and educational institutions so as to increase exposure to Southwest Network and our mission at least quarterly. Recruitment team will attend career fairs targeted to diversity candidates.	H.R./ recruiting team	Using Ultipro, all applicants indicate their referral source; measurements on diversity recruiting can be identified by running reports	Ongoing	Ongoing	Specificity of qualifications for our industry and cost for advertising is occasionally a factor.

<p>2.3 Increase education in culturally and linguistically appropriate policies and procedures for staff across all disciplines of the organization.</p>	<p>Southwest Network provides cultural competency training to direct care staff within 90 days of hire and annually to all staff.</p> <p>CLAS audit results are used to inform and update annual cultural competency training.</p> <p>The Cultural Competency Plan, CLAS standards, and CLAS audit results will be part of the governance board meeting at least annually.</p>	<p>Executive team, leadership team, Training department</p>	<p>Signed attendance sheets, certificates of achievement</p>	<p>Ongoing</p>	<p>Cultural competency training provided Nov. 2017 to all staff.</p> <p>CLAS training provided at each site throughout 2017.</p> <p>CLAS audit results shared with the Board of Directors in April 2018.</p> <p>Cultural Competency Plan reviewed with the Board of Directors for recommendations in January 2018.</p> <p>Health Disparities Task Force established to inform annual cultural competency training.</p>	<p>Continual education around CC when requested and at least annually</p>
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3. Communication and Language Assistance (Standards 5, 6, 7 and 8)

Objectives: Ensure language assistance is available to individuals with limited English proficiency or other communication needs; Ensure staff is competent and proficient in utilizing interpretation, translation, and other culturally relevant services; Provide and maintain print, multimedia materials, and signage in languages commonly used by the populations in the service area.

Objective	Action Steps	Assigned Parties	Measures	Completion Date	Status/Progress Update	Identified Barriers/Comments
3.1 Ensure an effective method for clinical/important document translation is in place.	Implement and monitor workflow to incorporate procedures and existing documents for members with limited English proficiency (LEP).	Training department and office assistant	Workflows created and LEP documents reviewed as needed	Ongoing	Continual education regarding desktop procedure for appropriate document translation when requested and at least annually.	Due to small population of certified bilingual staff, information around training is not retained by staff as clinical/important document translation is less frequently utilized.
3.2 Ensure interpreter/interpretation services are being provided and appropriately used throughout the agency.	Training will be provided to staff for language line and interpreter services through contracted agencies, forms and policies, including: Akorbi Interpretation Services, ALTA Levels Writing, ALTA Levels Speaking, Voiance Interpreter, Bilingual Testing Stipend policy, Interpreter Request form, and <i>Guide to Working with Interpreters</i> .	Compliance Officer Clinical leadership Quality Improvement (Q.I.) dept.	Internal and external audits Family Input Tool and Member Feedback Questionnaires	Ongoing	Cultural competency training provided Nov. 2017 to all staff. CLAS training provided at each site throughout 2017.	Members request family members be used as preferred interpreters. Working toward increasing documentation of interpretation use in the medical record.

	Utilize internal and external audit results to ensure tools and services are being utilized for members identified as LEP.	Site leadership Q.I. dept. Training department	Supervision notes Internal and external audit results Signatures on training rosters	Ongoing		
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4. Engagement, Continuous Improvement, and Accountability (Standards 9 – 15)
Objectives: Establish and maintain goals, policies, and accountability throughout the organization; Collect culturally relevant data through assessments and monitoring progress; Partner with the community to remain culturally and linguistically appropriate.

Objective	Action Steps	Assigned Parties	Measures	Completion Date	Status/Progress Update	Identified Barriers/Comments
4.1 The CCC will provide feedback to the executive leadership team on a regular basis in order to help steer Southwest Network’s cultural competency efforts.	The CCC will consist of representation from each site/region within Southwest Network and include leadership, administrative, and direct care staff.	Volunteer CCC members	Minutes and updates to CC Plan from quarterly meetings	Quarterly	CCC met: 12/8/2017 @ Estrella Vista 02/23/2018 @ Mesa Heritage 05/11/2018@ Central Valley	
4.2 Continue to develop partnerships with community councils, ethnic/cultural/social entities, spiritual leaders, faith based communities, and volunteer associations.	Continue to assemble resources in areas of interest or need, and in regards to services and supports that meet the needs of member and staff cultural preferences and/or	All staff, executive team, office assistant	<i>The Help Book</i> , updated August 2017 and ongoing	Ongoing	Reviewed 4/16/2018	

	<p>Creation of and seeking continuous feedback from Clinic Advisory Councils (CACs), Youth Advisory Board (YAB), and Pillars of Excellence Community committee.</p> <p>Focus will be on specific populations with health disparities through a task force that serves as a subcommittee of CCC (Health Disparities Task Force).</p>	<p>CCC members</p> <p>Pillars of Excellence Community committee meetings</p> <p>YAB</p> <p>CACs</p>	<p>Meeting minutes and/or agendas; attendance records</p>	<p>Ongoing</p>	<p>Southwest Network Community Partnership Committee created on 12/08/2017 to build community partnerships.</p>	
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