

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 Plan as needed.	Volunteer CCC members	Minutes and updates from CCC meetings	Meetings held ongoing on quarterly schedule	CCC met: 01/17/20 at Central Valley 04/17/20; 7/17/20; 8/28/20; 12/4/20; 1/8/21; 3/17/21; 5/20/21 and 6/17/21 via conference call.	Inconsistent membership attendance
	Southwest Network will participate in a national cohort called Project ECHO facilitated by the National Council on Mental Wellbeing aimed at improving the provision of effective, equitable, and quality outcomes for employees and members served.	VP, Quality Improvement and Compliance	Project Echo workplan	Meetings held monthly over a six-month period of time	2/24/2021;3/22/2021;4/21/2021;5/20/2021; 6/23/2021; 6/21/2021 via teleconference.	

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 health plan requirements. Policies are reviewed at least biennially.	<p>Policies and procedures will be established, revised, and reviewed by subject matter experts in order to ensure they remain culturally relevant.</p> <p>The CCC will elevate feedback on policies and procedures to executive leadership for consideration.</p>	<p>Policy and forms will be reviewed by relevant subject experts and/or other designees.</p>	<p>Updated policies and/or procedures.</p> <p>At least one member from CCC to inform updates to policies and forms.</p>	Ongoing	All policies and forms continue to be reviewed biennially, at a minimum.	
2.2 Southwest Network's Human Resources (HR) 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.	<p>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 (as available).</p> <p>Recruitment team will attend a variety of career fairs to diversify candidates.</p>	HR/recruiting team	Using UKG, all applicants indicate their referral source; measurements on diversity recruiting can be identified by running reports.	Ongoing	Ongoing	<p>Specificity of qualifications for our industry and cost for advertising are challenging.</p> <p>There have been fewer opportunities to participate in the community due to the pandemic.</p>

<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>Southwest Network is pursuing additional diversity, equality and equity trainings.</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, clinical leadership team, training department</p>	<p>Signed attendance sheets, certificates of achievement</p>	<p>Ongoing</p>	<p>Cultural competency training provided to all staff Nov. 2019 and June 2020.</p> <p>CLAS audit results debrief with all site leaders in July 2020.</p> <p>Cultural Competency Plan reviewed with the Board of Directors in the May 2021 meeting.</p> <p>Mission and Vision statements were updated and approved by the Board of Directors February 2021.</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).	Quality Improvement and CCC	Workflows created and LEP documents reviewed as needed	Ongoing	Continual education regarding desktop procedure for appropriate document translation when requested and at least annually. A quarterly bilingual workgroup is being held to discuss successes and barriers.	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 provided and appropriately used throughout the organization.	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> . Utilize internal and external audit results to ensure tools and services are being utilized for members identified as LEP.	Compliance Officer Clinical leadership Quality Improvement (QI) dept. Site leadership QI dept. Training department	Internal and external audits Family Feedback Questionnaires and Member Feedback Questionnaires Supervision notes Internal and external audit results Signatures on training rosters	Ongoing Ongoing	Cultural competency training provided June 2020 and June 2021 to all staff. A quarterly bilingual workgroup is being held with bilingual staff to discuss successes and challenges.	Members request family members as preferred interpreters. Continuing efforts to increase documentation of interpretation use in the medical record. Each health plan has its own contract and process by which interpretation services are requested.

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; partner with 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 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 Cultural Competency Plan from quarterly meeting	Quarterly	CCC met: 01/17/20 @ Central Valley & 04/17/20; 7/17/20; 8/28/20; 12/4/20; 1/8/21; 3/17/21; 5/20/21 and 6/17/21 via conference call.	
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 regard to services and supports that meet the needs of member and staff cultural preferences and/or educational interests. Creation of and seeking continuous feedback from Clinic Advisory Councils (CACs) and Youth Advisory Board (YAB).	All staff, executive team, office assistant CCC members CACs	<i>The Help Book</i> , updated August 2017 and ongoing Meeting minutes and/or agendas; attendance records	Ongoing	Reviewed 4/9/2020 CCC will focus on building community partnerships in order to meet the diverse needs of members and employees.	Lack of CCC participation in response to COVID-19