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# **Southwestern Behavioral Healthcare CLAS CQI Planning Document**

**SBH CLAS Steering Committee Mission Statement:**

Southwestern Behavioral Healthcare (SBH) strives 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.

**Introduction**

Southwestern Behavioral Healthcare (SBH) is in the early stages of operationalizing CLAS Standards. This document represents a baseline continuing quality improvement to address health disparity in our local communities. It will provide a preliminary outline for the ongoing work to address the CLAS Standards and our organization's CLAS implementation plan.

This report, and the associated CLAS Committee workplan housed on our Teams site, is based on the following documents produced by the U.S. Department of Health and Human Services (HHS):

* *Behavioral Health Implementation Guide for the National Standards for Culturally and Linguistically Appropriate Services in Health and Health Care*
* *An Implementation Checklist for the National CLAS Standards* is used as a source for the suggested objectives used in this plan.

Each of the 3 themes and 15 Standards are identified and followed by a status update outlining the proposed CLAS implementation plan at SBH. Relevant documents will be identified and downloaded into the assessment portal.

**SBH CLAS Background:**

Under the SAMHSA CCBHC-E grant (2020-2022), our work was prescriptively focused on training our internal staff on CLAS concepts and populations. The focus of the CCBHC-IA grant is operationalizing CLAS Standards 10 & 11 per our SAMHSA Disparity Impact Statement. Both standards are operationalized and are included in the SBH FY24 CQI plan.

The DMHA SBH CLAS Assessment (CLAS Assessment) is requesting status on all 15 of the CLAS standards. We have completed preliminary work on most standards but have yet to formalize a CQI plan beyond Standards 10 and 11. In addition to the DMHA request, SBH is scheduled for a Joint Commission (JC) survey on adherence to the JC CLAS standards, effective July 1, 2023.

CLAS standards require a comprehensive CLAS CQI plan be developed and approved by governance and leadership (1.2.b); this document will function as the foundation of that plan. Once the CQI CLAS plan is complete it will be presented to the Directors Team, Leadership Team, and Board of Directors for final approval.

**Associated Documents: DMHA portal file, ‘Other Documents’**

* SBH 2022 CCBHC – IA Disparity Impact Statement
* SBH 2023 HHS OMH CLAS Implementation Checklist
* SBH CQI Plan FY24
* Southwestern Behavioral Healthcare SBH CLAS CQI Planning Document (CLAS CQI Plan)
* The *Behavioral Health Implementation Guide for the National Standards for Culturally and Linguistically Appropriate Services in Health,* HHS
* *Health Care*, and *The Implementation Checklist for National CLAS Standards,* HHS

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| Principal CLAS Standard: |
| 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. |

**CLAS Assessment Implementation Status:** Partially Implemented

Standard 1 is the Principal Standard because, conceptually, the aim of adopting the remaining 14 standards is to achieve Standard 1. Standards 2 through 15 represent the practices and policies intended to be the fundamental building blocks of CLAS necessary to achieve this Principal Standard.

**Associated Documents:**

* SBH CQI Plan FY24
* SBH [2022 CCBHC – IA Disparity Impact Statement](https://southwesternhealthcare.sharepoint.com/:w:/r/sites/CCBHSAMHSAProject/Shared%20Documents/CCBHC-IA%20Grant%202022-2026/CCBHC_IA%20DIS%2011_30_22%201H79SM086408_01.docx?d=w311402e4f1c24c788e912e4727b6f7bd&csf=1&web=1&e=LF1zcb)
* SBH Implementation of the National CLAS Standards Self-Assessment, HHS OMH – June 2022

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| CLAS Theme 1: Governance, Leadership, and Workforce |
| Standard #2: Advance and sustain organizational governance and leadership that promotes CLAS and health equity through policy, practices, and allocated resources. |

**CLAS Assessment Implementation Status:** Partially Implemented

**1.2a** Identify and designate a CLAS champion/champions, supported by the organization’s leadership, whose responsibilities include continual training focused on the intent and purpose of National CLAS Standards.

**Current Status**: Fully Implemented

SBH has established a CLAS Steering Committee (CLAS Committee) to act as agency champions. The CLAS Committee’s mission is to address health equity in our agency by developing, implementing, and reporting on SBH CLAS CQI efforts. Included in the steering committee are representatives from our Diversity Equity & Engagement Committee (DEE Committee), Data Analytics, Corporate Compliance, Grants Management, and Innovative Practices.

The CCBHC Implementation Committee (CCBHC Committee) has been meeting monthly since March 2021. These meetings include staff actively working on implementation projects as CCBHC transitions from Federal to State governance. The collaborative work of this Committee has been instrumental in our movement towards workflow development and standardization.

**1.2b** Create and implement a formal CLAS implementation plan that is endorsed and supported by the organization’s leadership, describing how each Standard is understood, how each Standard will be implemented and assessed, and who in the organization is responsible for overseeing implementation.

**Current Status:** Partially Implemented

The CLAS CQI Plan is linked to a Microsoft 365 Teams platform with project management capabilities. CQI implementation activities will be developed, tasks assigned, deadlines set, and responsibilities assigned, based on departmental ‘swim lanes’ of responsibility and subject matter expertise.

Workgroups will be assembled to address operational flow, electronic medical record design needs, staff education, logic modeling, and reporting. The Plan, Do, Study, Act model with be formalized and LEAN Rapid Improvement Events will be initiated as indicated.

A formal CLAS implementation plan will be finalized that defines how the Standards are understood, accompanied by an implementation plan and timetable. The Director of Innovative Practices will be responsible for overseeing implementation.

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| CLAS Theme 1: 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. |

**CLAS Assessment Implementation Status:** Partially Implemented

**1.3a** Target recruitment efforts to the populations served to increase the recruitment of culturally and linguistically diverse individuals, through actions such as: posting job descriptions in multiple languages in local community media, participating in job fairs in the communities served, and/or working with leaders of local community institutions to create mentorship and training programs targeting populations served.

**Current Status:** Partially Implemented

SBH is actively working to expand a culturally and linguistically diverse governance, leadership, and workforce. We are also in the process of establishing baseline client, staff, leadership, and governance demographics. Client demographic reporting is operational. All other categories are still under development.

The HR department is assessing current staff demographic composition and will evaluate our recruitment processes and job posting formats with the intent of better addressing issues of equity and diversity. HR and the DEE Committee continue active participation in community events and job fairs where they promote our agency as a welcoming workplace and solicit applications for employment (1.3.a).

**1.3b** Measure and report baseline demographic data of SBH staff, leadership team, directors, Board, all contracted DCOs.

**Current Status:** Partially Implemented

The demographic profiles of our leadership and governance groups have not been fully collected; a tool has been established, however has not been launched. Preliminary data indicates that over 51% of the SBH Board of Directors identify as having lived experience with mental health and that 40% of the SBH departmental directors are BIPOC and/or LGBTQ+. We also know that in our 2021 DEE Committee Climate Assessment Survey, 46% of staff respondents identified as a member of an unspecified minority group. We are requesting DMHA clarification on demographic reporting requirements for Designated Collaborating Organizations (DCOs).

**Associated Documents:**

* 2021 SBH DEE Internal Climate Assessment
* IN DARMHA Demographics tool

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| CLAS Theme 1: Governance, Leadership, and Workforce |
| Standard #4: Educate and train governance, leadership, and workforce in culturally and linguistically appropriate policies and practices on an ongoing basis. |

**CLAS Assessment Implementation Status:** Partially Implemented

**1.4a** Deliver or make freely available continuous CLAS-related training and technical assistance to agency leadership and all staff.

**Current Status**: Fully Implemented and under refinement

CLAS work for the 2021 SAMHSA CCBHC-E grant. Per this scope of work, a Corporate Trainer position was established. Their primary role is to standardize, revise, and track staff training across our system of care.

A CLAS training curriculum was required as part of the CCBHC attestation criteria but not provided. Training tracks were established by individual grantees. Initial CQI projects focused on locating engaging and high-quality training from sources identified in CCBHC guidance documents. Staff training curriculum was developed, standardized, and launched via Relias. We have sourced CLAS training from the HHS Office of Minority Health and Star Behavioral Health.

Through the work of the Staff Development and DEE Committees, new employees are trained in diversity, engagement, cultural humility, and conflict resolution during new hire orientation. Additional CLAS training is required during new hire onboarding and annually thereafter. All training is tracked via the Relias data warehouse. The SBH leadership team is engaged in moderated discussions and training on diversity, engagement, and cultural humility during bi-monthly meetings.

Since 2021 live webinar trainings have been developed and moderated by the DEE Committee on topics including: Cultural Humility Series: Code-Switching Panel Discussion; Cultural Humility Series: Gender Expansive Panel Discussion; Cultural Humility Series; Cultural Humility Series: Neurodiversity Panel Discussion; Cultural Humility Series: Pride Panel – LGBTQ+; Cultural Humility Series: Privilege Panel Discussion. We have a total of 563 staff who have been trained on CLAS topics since June 2021.

The DEE and the CLAS Committees will collaborate to refine workflows and training selections as part of our CLAS initiatives. Internal efforts will be launched to educate governance, leadership, and staff on the intent of the CLAS standards in reducing health inequities.

**1.4b** Create and disseminate new resources about CLAS within the organization using widely accessible platforms.

**Current Status:** Partially Implemented

The DEE Committee initiated cultural awareness efforts through several initiatives. These projects included the distribution of pronoun pins to staff, and DEE Committee t-shirt sales. Shirts were designed with the logo: Respect, Inclusion, Social Justice, and Equity (R.I.S.E. Up). R.I.S.E. Up Wednesdays were implemented for staff to wear their t-shirts and show support towards awareness efforts. Since September 2022, staff have purchased over 350 shirts to support the initiative.

The SBH [Connect Newsletter](https://rc.southwestern.org/behavioral/diversity-equity-and-engagement-dee/connect-newsletter/), initiated and managed by DEE Committee, is distributed quarterly by email and archived on the SBH public webpage. Articles have included:

* Local and national African American history
* Native American heritage
* LGBTQ+ history
* Stories of lived experiences among staff
* Clinical work with diverse populations
* BIPOC women in the transgender liberation movement
* Juneteenth
* Person first language/pronoun usage
* Allyship
* Health disparity awareness
* Housing barriers based on Social Determinants of Health or chronic psychiatric illness

Our DEE Committee has been recognized for its equity and engagement initiatives within our agency and the broader community. In 2023 the committee collaborated with the Evansville Regional Economic Partnership to develop the Diversity, Equity, and Inclusion Action Plan for southwestern Indiana. The DEE Committee was recently featured in Evansville Business Magazine and was nominated for a local Celebration of Leadership award by Leadership Evansville in July 2023.

**Associated Documents:**

* SBH Staff Training Report
* DEE Connect Newsletter – March 2023
* Evansville Regional Economic Partnership Diversity, Equity, and Inclusion Action Plan
* Evansville Business Magazine – July 2023
* DEE Celebration of Leadership Nomination Certificate – July 2023

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| CLAS Theme 2: 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. |

**CLAS Assessment Implementation Status:** Partially Implemented

**2.5a** Complete an organizational assessment specific to language assistance services with the goal of educating staff on rapid access to language assistance and improve services for individuals with limited English proficiency (LEP).

**Current Status:** Partially Implemented

Most policies, information, and services are in place for language assistance CQI initiatives to begin. This project will begin with completing self-assessment in the *Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Program*, published by the Federal Coordination and Compliance Section Civil Rights Division U.S. Department of Justice.

**2.5b** Standardize rapid workflow of connecting SBH staff and person requesting CCBHC services to contracted language interpretive services. Include: video conferencing options for those needing sign language interpreters, translated flyer verifying primary language, and that an interpreter is provided upon request.

**Current Status:** Not Yet Implemented

This CQI initiative is scheduled for go-live in March 2024. While most of the needed policy and workflow pieces are in place, and are being used by SBH staff, the process lacks consistent staff knowledge and workflow processes.

**Associated Documents:**

* CLI Interpreting Services Instruction Card
* SBH Interpretation and Translation Services Policy

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| CLAS Theme 2: Communication and Language Assistance |
| Standard #6: Inform all individuals of the availability of language assistance services clearly and in their preferred language, verbally and in writing. |

**CLAS Assessment Implementation Status:** Partially Implemented

**2.6a** Provide individuals with notifications describing what communication and language assistance services are available, in what languages the assistance is available, and to whom they are available. The notification should clearly state that communication and language assistance is provided by the organization free of charge to individuals.

**Current Status:** Partially Implemented

Certified Languages International, Inc. is our contracted provider of certified interpretation and translation services. Language assistance services are provided free of charge. A CLAS CQI workgroup will complete a full build of operational workflows, documentation in the EHR, and tracking of language assistance services. Using a Plan-Do-Study-Act model, outcome measures will be established to document the impact of change efforts.

**Associated Documents:**

* CLI Interpreting Services Instruction Card

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| CLAS Theme 2: Communication and 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. |

**CLAS Assessment Implementation Status:** Not Yet Implemented

**2.7a** Require that all individuals serving as language interpreters complete certification or other formal assessments of linguistic and health care terminology skills to demonstrate competency.

**Current status:** Not Yet Implemented

SBH contracts with Certified Languages International for our interpreter and translation needs; per contract, all CLI staff providing translation services are certified. Following an agency language services self-assessment, all contractual service details will be reviewed to ensure compliance with this standard. In addition, we are standardizing the logic model to report on pre- and post-intervention interpreter service usage. Intra- and inter-agency workflow process will be standardized and implemented to provide clients seamless access to interpreter services.

**Associated Documents:**

* Certified Languages International contract
* CLI Interpreting Services Instruction Card
* Interpretation and Translation Services policy

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| CLAS Theme 2: Communication and Language Assistance |
| Standard #8: Provide easy-to-understand print and multimedia materials and signage in the languages commonly used by the populations in the service area. |

**CLAS Assessment Implementation Status:** Partially Implemented

**2.8a** Formalize processes for translating materials into languages other than English and for evaluating the quality of these translations. This may include testing materials with target audiences.

**Current Status:** Not Yet Implemented

SBH is formalizing our translation of materials. We can report that our [website](https://www.southwestern.org/) can be translated from English into 9 other languages via Google Translate.

As part of this CQI plan, we will engage small focus groups to validate the accuracy of our translated documents. Additionally, we will be setting up meetings with CLI to coordinate workflows with a specific focus on crisis services. We also seek to foster CLAS awareness by mentoring emerging SBH leaders.

**Associated Documents:**

* Crisis Services Card, Spanish version
* Child and Family Services Brochure, Spanish version

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| CLAS Theme 3: Engagement, Continuous Improvement, and Accountability |
| Standard #9: Establish culturally and linguistically appropriate goals, policies, and management accountability, and infuse them throughout the organization's planning and operations. |

**CLAS Assessment Implementation Status:** Partially Implemented

**3.9a** Incorporate CLAS into mission, vision, and/or strategic plans by determining how the organization acknowledges and addresses concepts such as diversity, equity, inclusion, and practices such as asking individuals about preferences for care/services.

**Current Status:** Partially Implemented

SBH will be incorporating CLAS standards into our mission, vision, and strategic plans. We currently have a Diversity, Equity, and Engagement position statement and associated SBH policy that predate this effort. In the future we will focus on infusing CLAS Standards throughout our planning efforts.

**Associated Documents:**

* Diversity, Equity, and Engagement Plan
* Diversity, Equity, and Inclusion Policy
* DEE Position Statement
* DEE Position Statement – Photo from Website
* SBH Mission Statement and Values

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| CLAS Theme 3: Engagement, Continuous Improvement, and Accountability |
| Standard #10: Conduct ongoing assessments of the organization's CLAS- related activities and integrate CLAS-related measures into measurement and continuous quality improvement activities. |

**CLAS Assessment Implementation Status**: Partially Implemented

**3.10a** Tailor existing evaluation efforts to include measures of CLAS implementation: achieve data reporting capacity using race, ethnicity, and language (REAL) data to determine demographic differences).

**Current Status**: Partially Implemented

The data analytics team has completed validation of our client demographic data as of July 2023. Data analytic models are being developed that will allow us to stratify outcome measure reporting by demographic differences.

**3.10b** Complete a CLAS-related organizational assessment of the cultural and linguistic needs of populations served and of organizational resources to address these needs.

**Current Status:** Partially Implemented

SBH is participating in the DMHA CMHC CLAS Baseline Assessment, Joint Commission survey, and the CCBHC community needs assessment over the remainder of 2023.

In 2021 the DEE Committee worked with an external evaluation team to complete a baseline assessment of the internal cultural environment at SBH. In September 2023, the 2nd iteration of that assessment will be launched. Pre- and post-assessment data will guide future CQI initiatives.

**Associated Documents:**

* SBH CQI Plan FY24
* SBH Demographic Profile July 2023

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| CLAS Theme 3: Engagement, Continuous Improvement, and Accountability |
| 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. |

**CLAS Assessment Implementation Status:** Partially Implemented

**3.11a** Collect REAL data from all individuals receiving services, either by tailoring existing data collection approaches or creating a new data collection process.

**Current Status:** Fully Implemented

Per our DIS commitment for the CCBHC-IA grant, CLAS Standard 11 has been operationalized and included in the SBH CQI plan FY24. REAL data has been validated and will be used to stratify outcome measures by December 2023.

SBH has identified issues of missing sexual orientation and gender identity (SOGI) data, collected as part of the registration process. Data from the IN NOMS is now being used to decrease the percentage of missing data while staff training is being planned on scripting the collection of SOGI information. We will identify training resources with the SOGI Center to use in staff training.

**3.11b** Use REAL data to identify needs, describe current care and service provision trends, and improve care and service provision.

**Current Status**: Partially Implemented

Validating client demographic information is complete. Current efforts for this standard are centered on utilizing SBH client demographics for an overview of current care trends and outcomes.

**Associated Documents:**

* SBH CQI Plan FY24
* SBH Demographic Profile July 2023
* SMART GOAL: CQI Implementation Plan and Timeline
* SBH [2022 CCBHC – IA Disparity Impact Statement](https://southwesternhealthcare.sharepoint.com/:w:/r/sites/CCBHSAMHSAProject/Shared%20Documents/CCBHC-IA%20Grant%202022-2026/CCBHC_IA%20DIS%2011_30_22%201H79SM086408_01.docx?d=w311402e4f1c24c788e912e4727b6f7bd&csf=1&web=1&e=LF1zcb)

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| CLAS Theme 3: **Engagement**, Continuous Improvement, and Accountability |
| 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. |

**CLAS Assessment Implementation Status:** Partially Implemented

**3.12a** Complete community health assets and needs assessment by July 2024. This process will include focus groups of community members that will inform strategic plans for outreach and engagement.

**Current Status**: Fully Implemented

SAMHSA CCBHC grantees are required to complete a community needs assessment every 3 years. SBH completed an initial assessment in June 2021 and Diehl Consulting Group has been contracted to complete a comprehensive community needs assessment in April 2024.

The current DMHA CLAS assessment will build upon the SAMHSA CCBHC-IA Disparity Impact Statement completed in January 2024.

**Associated Documents:**

* SBH [2022 CCBHC – IA Disparity Impact Statement](https://southwesternhealthcare.sharepoint.com/:w:/r/sites/CCBHSAMHSAProject/Shared%20Documents/CCBHC-IA%20Grant%202022-2026/CCBHC_IA%20DIS%2011_30_22%201H79SM086408_01.docx?d=w311402e4f1c24c788e912e4727b6f7bd&csf=1&web=1&e=LF1zcb)

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| CLAS Theme 3: Engagement, Continuous Improvement, and Accountability |
| Standard #13: Partner with the community to design, implement, and evaluate policies, practices, and services to ensure cultural and linguistic appropriateness. |

**CLAS Assessment Implementation Status**: Partially Implemented

**3.13a**  Include community members in the process of planning programs and developing policies to ensure cultural and linguistic appropriateness by convening town hall meetings, conducting focus groups.

**Current Status:** Not Yet Implemented

SBH has recently transitioned from working with a Consumer Advisory Board to incorporating this role into the SBH Board of Directors’ responsibilities. Under this strategy, SBH strives to recruit and retain Board Members with mental health lived experiences. 76% of our current Board members meet criteria for inclusion as part of this targeted demographic (13 of 17).

As we develop strategies to better serve our culturally and linguistically diverse community members, focus groups will be conducted as part of the upcoming community health assessment with Diehl Consulting Group.

**Associated Documents:**

* None.

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| CLAS Theme 3: Engagement, Continuous Improvement, and Accountability |
| Standard #14: Create conflict and grievance resolution processes that are culturally and linguistically appropriate to identify, prevent, and resolve conflicts or complaints. |

**CLAS Assessment Implementation Status:** Partially Implemented

**3.14a** Provide education and training on working with interpreters, conflict resolution training to staff and implement culturally informed conflict and grievance processes.

**Current Status**: Partially Implemented

The DEE Committee began providing “Diversity, Equity, and Engagement” training as part of new hire orientation in March 2023 (N= 28 participants). In addition, culturally relevant conflict resolution has been integrated into the orientation curriculum. The SBH Leadership Team has also participated in this conflict resolution training as part of ongoing leadership development efforts.

Conflict and grievance resolution policies, processes, and protocols will be reviewed in the next fiscal year.

Currently MSW staff are trained to use our interpretation services during new hire orientation. Standardizing and expanding this orientation to all agency staff will be a starting point of upcoming language assistance CQI projects.

**Associated Documents:**

* None

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| CLAS Theme 3: Engagement, Continuous Improvement, and Accountability |
| Standard #15: Communicate the organization's progress in implementing and sustaining CLAS to all stakeholders, constituents, and the general public. |

**CLAS Assessment Implementation Status**: Not Yet Implemented

**3.15** Partner with community organizations to lead discussions about the services provided and progress made and to create advisory boards on issues affecting diverse populations and how best to engage and serve them.

**Current Status**: Not yet implemented.

As part of our 2024 Community Needs Assessment, we will be conducting focus groups with service providers, religious and/or spiritual organizations, and community groups for input on how SBH can better meet the needs of the communities they serve.

Currently agency outreach activities are tracked and reported to SAMHSA. In the previous reporting quarter, our crisis services partnered with 31 local organizations in an ongoing effort to increase active working partnerships and interagency workflows.

**Associated Documents**:

* SAMHSA IPP Community Partner Contact Tracking