

CLAS Training

Facilitator's Guide

Session Five

Time: 90 minutes

Ideal Audience size: 12-30 participants

Materials:

- ▶ PowerPoint presentation
- ▶ Flip charts and markers or white boards
- ▶ National Standards for Culturally and Linguistically Appropriate Services, hand-out of 15 standards (1 per participant)
- ▶ Example organization policies, vision statements, strategic plans related to CLAS
- ▶ Handout: Definitions for Policies
- ▶ Paper and pens

Learning objectives:

- ▶ Identify the staff needed to adopt and implement CLAS
- ▶ Give examples of the important elements in a policy on CLAS standards
- ▶ Identify one barrier and one approach to integrating CLAS into practice

Example commentary for select slides – Adapt to audience

[INTRODUCTION]

About this training: This training is brought to you by the Governor's Interagency Council on Health Disparities. The council was established by the Washington State Legislature in 2006. They are charged with creating a state policy action plan to eliminate health disparities by race/ethnicity and gender

[SLIDE 4]

When we talk about integrating CLAS into policy and practice during this session, these are the concepts we are going to touch on. These are in no way exhaustive of all the ways agencies can and should integrate CLAS into practice, but they will let us at least start the conversation.

We will start by talking about how to integrate CLAS into policy, and we'll look at three different ways to do that.

Then, we will talk about how to integrate CLAS into practice. We'll look at four—of the many—ways to do that.

[SLIDE 6]

To be successful in both 1) creating policy change and 2) implementing and maintaining that change, we recommend you engage:

- Staff who are already engaged in the effort. Who in your agency is already doing work that supports the CLAS standards? Who is passionate about health equity work? Look for the “movers and shakers” in your agency.
- It is equally important to engage the gatekeepers. Who have you sensed the most resistance from? Think about the parts of your agency that CLAS will affect the most. Who are the gatekeepers? Sometimes these staff are also in decision making roles; sometimes they aren't.
- Your decision makers are likely your agency leaders or executive sponsors.
- Although it may not be necessary to engage program level staff for policy change, you will want them on board to ensure appropriate implementation and maintenance of the CLAS standards. Staff that are the most affected by CLAS, but not in traditional decision making roles, will have a unique insight on what operationalizing your CLAS policies will look like. This insight will help you identify motivating factors to CLAS implementation, barriers, and resources needed by staff.

Example team roles include:

- Executive sponsor: They will be your decision maker; potentially a member of your agency leadership team.
- Human Resources coordinator: It's important to engage human resources since you'll be doing a lot of policy change in their area of expertise. This person could potentially be a decision maker. They could be a gatekeeper if they're not bought in. Or, they could be mid-level staff that are engaged in the effort and will be a champion for this work.
- Data coordinator: You will want to identify someone who is on board and can help you establish baseline data, performance measures, and provide support for ongoing monitoring and evaluation.
- Communications coordinator: The first step to become a CLAS compliant agency is to adopt policy. The second step is to communicate about it. You will need strong communications support to plan internal and external communications. Internally, staff will need to know about the policy change and what it means for their work. Externally, the populations you serve will need to know how these policy changes affect them.

Discussion: Who else would you engage to make sure you have a well balanced CLAS adoption team?

[SLIDE 7]

There are many different approaches to adopting CLAS compliant policies. Different approaches may be more appropriate for different agencies, depending on human resource capacity for policy change.

Generally, the more comprehensive the approach, the more work it will take for the agency. However, this upfront work can really pay off. By creating a really comprehensive foundation of CLAS compliance in all policies, you better prepare your agency to implement and maintain CLAS compliant services.

Option 1: Adopt an umbrella CLAS compliant policy.

Option 2: Integrate CLAS compliant language into existing policies.

Option 3: Integrate CLAS compliant language into existing policies and adopt an umbrella policy so all future policies also comply with the CLAS standards.

Option 4: Look at the 15 standards and your existing related policies. Integrate CLAS compliant language into the existing policies and develop new policies to address any gaps your agency has to meeting all 15 of the standards.

Option 5: The most comprehensive approach is to integrate CLAS language into related, existing policies + develop new policies to address any gaps (e.g. language access services) + adopt an umbrella policy to ensure that all future policy changes comply with the CLAS standards.

[SLIDE 8]

Let's first look at some advantages and disadvantages of having an umbrella policy. An umbrella policy demonstrates commitment and a large statement of compliance. And since it requires just one policy to be developed, it may be the most efficient route to adopting CLAS.

Some potential disadvantages include that there may be less assurance that the policy will infuse CLAS throughout the agency or organization. Additionally, work to understand CLAS then falls on the policy implementers. For example, if this umbrella policy is referenced in a policy on hiring and recruitment, the implementers of the hiring and recruitment policy would be responsible for understanding what CLAS means for that specific policy.

[SLIDE 9]

Integrating CLAS language into existing policies also comes with some potential advantages and disadvantages. Integration may allow for more assurance. Also, this process can be gradual, which may be more realistic for policy approvers. For example, CLAS compliant language could be introduced into existing policies as they come up for review.

Potential disadvantages include that gradual integration doesn't provide the same, initial foundation that an umbrella policy would. There could be potential gaps. Organizations and agencies would need to make sure that all the CLAS standards are met through the revision of existing policies.

[SLIDES 10-11]

Here's an example of what a policy review process might look like. Again, policy review processes—just like policy development processes—are going to differ by agency and organization.

This is what integrating CLAS into this example policy review process would look like. As you see, integrating CLAS—in this scenario—only adds one step: That the CLAS adoption team trains the internal policy committee on CLAS standards and provides them resources to help assure that CLAS is integrated into relevant policies. This could be a check-list of what to look for or consider and/or draft CLAS-compliant language to include.

Besides that, the other steps remain the same but have a stronger, integrated focus on CLAS.

[SLIDE 12]

The last approach we will touch on is new policies. An agency or organization may choose to develop new policies to address any gaps that aren't covered by existing policies. For example, if an agency already has existing policies that meet the CLAS standards for governance, leadership, workforce, and quality improvement, they may choose to create a new policy to cover communication and language assistance.

This approach can help ensure that all the CLAS standards are met through policies. It could end up being more time-consuming and involve more people than the other approaches. However, on the contrary, for some organizations and agencies, it could end up being more efficient and streamlined.

Again, it all goes back to the fact that all agencies and organizations having different policy development processes. Staff who are frequently involved in policy review and development processes will know what will work best for their agency or organization.

[SLIDES 13-14]

I'm going to touch briefly on the typical elements of a policy. Keep in mind that each agency is different and has its own format.

In general the format includes:

- Title
- Subject
- Authorizing sources
- Effective date

Purpose: Consider including the principal CLAS standard as the purpose statement.

Scope: Who the policy applies to.

Definitions and common terms: Please refer to your handout, which includes definitions and terms that may be helpful for CLAS-related policies.

Policy statement: This includes behavioral expectations, responsibilities, monitoring, and evaluation. For CLAS policies, consider:

- Provision of services to customers.
- Language services for both oral and written communications.
- Staff recruitment, retention, promotion, and training. Types of training should be specified. This includes management and program staff.
- Agency staff and or division responsibilities.
- Monitoring, engagement, and accountability; which would include assessment and data collection, grievance procedures, and reporting on partnerships and CLAS activities.
- Evaluation of policy effectiveness.
- Complaint procedure: For when customers report being denied culturally and linguistically appropriate services.

References: Policies can also include references. Some references that may be useful for CLAS-related policies include the National CLAS Standards, the Department of Justice Title VI guidance, and Executive Order 13166.

Resources: You could include links to resources that will help actualize the policy. For example, links to the translation certification company your organizations uses or common data sources.

Procedures: Some agencies and organizations include the procedures in the policies; others have them separate.

This slide gives two examples of ways to write procedures in a policy document. Note that all procedures should include the key functions, activities, and persons involved.

The first is a procedure on translation conduct for bilingual staff.

The second is for Translation Services. There may be multiple processes for this one procedure.

[SLIDE 15]

Directions: Pass out an example policy and divide class into small groups.

Now we're going to do another activity. As a small group, talk about what you would add or change to the example policy to make it CLAS compliant. Then, discuss what policies your agencies have that you would consider adding CLAS compliant language to.

Potential policies:

Diversity, Equal Employment Opportunity, and Non-Discrimination
Human Resource Development Plan
Reasonable Accommodation
Dual Language Certification
Staff Training and Development
Staff recruitment, promotion and appointments

[SLIDE 16]

Let's take a look at how we're progressing towards today's task. We have covered integrating CLAS into policy for umbrella, existing, and new policies. Now it's time to tackle integrating CLAS into practice.

Please choose between the four topics we're covering: 1) Grants, 2) Organizational culture, 3) Customer Service, and 4) Material development. Each group will come up with a strategy to integrate CLAS into their topic. Please use the flip chart paper to report back.

[SLIDE 18]

We have covered all of the 15 CLAS standards and how to integrate CLAS into policy and practice. Let's recap what we've learned about adopting and implementing the CLAS standards.

1. We start with an assessment. The CLAS standards talk about doing both an organizational and community assessment. Both are necessary. The community assessment helps you understand the populations you serve. What languages do they speak? What is the proportion of LEP persons from each language group in its service area? What cultural beliefs do these communities have that you need to take into consideration? You may use public data (like the Census) to help with your assessment. Your assessment should also include your own formative research. You could convene community meetings, hold focus groups, survey your population, or collaborate with cultural brokers/CHWs to get feedback from your community.

The organizational assessment will help you identify what your agency is already doing that either supports—or doesn't support—the CLAS standards. You will look at everything from your 1) recruitment practices, 2) what language services you currently provide, and 3) your agency's process for engaging communities.

2. Your assessments will reveal gaps, opportunities, strengths and weaknesses for the standards in all three themes.

3. These gaps, opportunities, strengths, and weaknesses will help you formulate your strategies for actualizing CLAS. What policy changes need to happen internally? What changes need to happen to existing practices or processes—like the contracts process, process for addressing complaints, or method of communicating with LEP populations? What new resources does your agency need, for example: guidance on how to develop easy-to-understand materials?

During this step, you will create an implementation plan. This plan should include performance measures—which, as we saw in session 4—will help you know later on how effective your strategies are. These will be used during the monitoring and evaluation phases.

4. We talked a lot about staff training throughout all five sessions. The work of all staff in an agency or organization affects that agency or organization’s mission, vision, and outcomes. If an agency or organization commits to providing culturally and linguistically appropriate services, the whole agency or organization will need to know what that means for their own individual work and the agency or organization as a whole. Staff will need a variety of training. Some examples include: cultural competency, how to work with interpreters, how to improve recruitment/promotion practices, and how to collect reliable demographic data. Any change in policy or practice should be accompanied by training for all affected staff.

5. Now it’s time to implement and provide culturally and linguistically appropriate services. An important part of this step is communicating to the populations you serve that these services are now available. In session 3, we talked about how the second most common barrier that LEP populations face to accessing services is not knowing that language services exist.

6. After implementation has started, monitoring will begin. You will look to the performance measures you created during your implementation planning to assess your continual progress. This ensures accountability. This ongoing monitoring allows for agencies and organizations to identify processes or practices that may still need improvement and adjust accordingly. It’s important to communicate your progress and efforts to the communities you work with, internal staff, and stakeholders.

7. Last we have evaluation. Evaluation of the CLAS standards will not be a one-time thing. This is a time to see how well an agency has achieved the principal standard. Because, as we have talked about, by implementing standards 2-15, an agency or organization should achieve the principal standard. An agency or organization may choose to evaluate efforts, progress, and outcomes on an annual basis or every few years. This could include an evaluation of staff beliefs, attitudes, and confidence in implementing the CLAS Standards. It could include an evaluation of utilization and quality of services. The evaluation serves as another opportunity to identify areas for improvement and make adjustments as needed.

This process should include community engagement/partnership and open communication every step of the way. Overall, it is cyclical. As the demographics of the communities change, so will an agency or organization’s approach to serving them and providing culturally and linguistically appropriate services. CLAS is about being responsive to the needs of the communities you serve.