



Section: <b>QAPI</b>	Policy Name: <b>Cultural &amp; Linguistic Competency</b>	Policy Number: <b>03.07</b>
Owner: <b>Director of Quality Management and Clinical Outcomes</b>	Reviewed By: <b>Alena Lacey, MA, LPC.</b>	Total Pages: <b>4</b>
Required By: <input type="checkbox"/> BBA <input checked="" type="checkbox"/> MDHHS <input type="checkbox"/> Other (please specify):	Final Approval By:  <i>Alena Lacey</i>	Date Approved:  Jul 2, 2024
Application: <input checked="" type="checkbox"/> SWMBH Internal Staff <input checked="" type="checkbox"/> Participant CMHSPs <input checked="" type="checkbox"/> SUD Providers <input checked="" type="checkbox"/> MH/IDD Providers <input type="checkbox"/> Other (please specify): _____	Line of Business: <input checked="" type="checkbox"/> Medicaid <input type="checkbox"/> Other (please specify): _____ <input checked="" type="checkbox"/> Healthy Michigan <input checked="" type="checkbox"/> SUD Block Grant <input checked="" type="checkbox"/> SUD Medicaid	Effective Date: <b>7/16/2014</b>

**Policy:** It is the policy of SWMBH and its Provider Network to effectively provide services to recipients of all cultures, ages, races, genders, sexual orientations, socioeconomic status, languages, ethnic backgrounds, spiritual beliefs, and religions in a manner that recognizes, values, affirms, and respects the worth of the individuals and protects and preserves the dignity of each person. Southwest Michigan Behavioral Health (SWMBH) values diversity as the full utilization of all human resource potential. SWMBH seeks to understand and value differences in promoting mental health and substance abuse services that empower all people to succeed. There will be an ongoing and continuous commitment to create and promote an inclusive work and service provision environment that values our differences.

**Purpose:** This policy is intended to define the expectations for Southwest Michigan Behavioral Health (SWMBH) and its Provider Network to provide culturally competent supports and services. Its purpose is to reduce service disparities that are inextricably linked to cultural issues and to ensure that all cultures have access to, and availability of, mental health and substance abuse services. This policy conveys SWMBH’s commitment to cultural and linguistic competency and to outline the ways this commitment will be carried out. It is the official position of SWMBH that cultural diversity and cultural competency are prized assets and sources of great enrichment for staff, providers, and members alike and as such, they should be celebrated, eagerly explored and viewed in highly positive terms.

**Scope:** All SWMBH staff and its Provider Network



**Responsibilities:** N/A

**Definitions:**

**A. Culture**

The word "culture" describes the integrated pattern of human behavior that includes action, assumptions, values, reasoning, and communication of a racial, ethnic, religious, or social group. The word "competence" is the "state of being capable" (Webster's 1977) of functioning in a particular way. Therefore, culturally competent services are systems, agencies, and practitioners that have the capacity, skills, and knowledge to respond to the unique needs of populations whose cultures are different from that which might be called dominant or mainstream American.

**B. Cultural Awareness**

Cultural awareness is the self-examination of one's own cultural background and identity relative to the cultural values of others. This process involves the recognition of one's biases, prejudices and assumptions about individuals who are different. Cultural awareness works to:

1. Create an environment that recognizes, values, and utilizes the unique skills and abilities of everyone
2. To maximize the level of contribution of each cultural group

**C. Cultural Proficiency**

Cultural proficiency means the systematic utilization of the talents of people of different backgrounds, experiences, and perspectives as a means of further improving the workplace environment, facilitating the exchange of culturally based knowledge, and enhancing the outcome of the services performed by the organization. It is a philosophy of recruitment, development and retention of personnel who reflect the culture of individuals served and includes an organizational philosophy of people gaining knowledge toward enhancing personal and organizational cultural proficiency and competency. Materials and communications will be evaluated to ensure that these are addressing the cultural and linguistic needs of a diverse membership.

**D. Culturally Competent Services**

Services provided within the framework of an effective planning effort that take into consideration the impact that cultural values and culturally related issues may have on the way that services are provided. This process requires personnel to achieve certain levels of cultural proficiency in order to plan and deliver culturally sensitive service strategies. SWMBH will work to reduce health care disparities in clinical areas as well as to improve network adequacy to meet the needs of underserved groups. Cultural competence is a set of congruent behaviors, attitudes, structures, and policies that come together to work effectively in intercultural situations. The cultural competency of an organization is demonstrated by its policies and practices.

**Standards and Guidelines:**

- A. SWMBH shall use the Culturally and Linguistically Appropriate Standards (CLAS) as general guidelines.



- B. Collaboration within our service area and with our community partners will occur in order to enhance our diversity goals and ensure equal access for persons with diverse cultural backgrounds.
- C. The SWMBH Quality Management Committee will share and promote CLAS standards at least annually with regional CMHSP partners
- D. All service provision activities and programs within SWMBH will be culturally competent so that all persons served are treated in the most sensitive and respectful manner.
- E. All personnel within the SWMBH provider system are expected to participate in initial and annual Cultural Awareness and Competency education that promotes or leads to cultural competence.
- F. SWMBH has written guidelines to explore diversity issues in the hiring process that are to be used throughout the provider network SWMBH participates in MDHHS' efforts to promote the delivery of services in a culturally competent manner to all members, including those with limited English proficiency and diversity cultural and ethnic backgrounds, disabilities, and regardless of sex.

**References:**

Federal Code of Regulations, 42 CFR § 438.100 & 438.206(c)(2)

National Standards for Culturally and Linguistically Appropriate Services in Health Care, EXECUTIVE SUMMARY. U.S. Dept. of Health & Human Services Office of Minority Health, March 2001

NCQA, MBHO, QI Standard 3, Element A, Factor 1

[SWMBH Cultural Competency Plan](#)

Network Adequacy Analysis A practical Guide to Implementing the National CLAS Standards

<https://www.cms.gov/About-CMS/Agency-Information/OMH/Downloads/CLAS-Toolkit-12-7-16.pdf>

**Attachments:**

03.07A SWMBH Cultural Competency Plan

### Revision History

Revision #	Revision Date	Revision Location	Revision Summary	Revisor
Initial	7/16/19	ALL	Converted document to new template	A. Wood
1	6/11/20	ALL References	Updated template  Updated references to 2020 NCQA requirements, removed Network Adequacy Plan, added SWMBH Cultural Competency Plan	A. Wood
2	6/9/22	All, References	Added CMS CLAS Guide and Toolkit, moved definitions to beginning, redefined committee expectations	E. DeLeon
3	2/27/24	All	Updated policy and purpose statements.	E. DeLeon