



Embedding DEI in Systems of Support for Individuals with Intellectual and Developmental Disabilities

Demographics in the United States are shifting, and the multicultural trends are expanding the racial and ethnic disparities in health and long-term services and supports. States are supporting greater numbers of people with disabilities in home and community-based settings, which has contributed to the need for a diversified workforce of direct support professionals. Increasingly, state I/DD systems are using qualitative and quantitative data to understand their service delivery systems and their impact on individuals with I/DD and their families – both those served and unserved by the state I/DD system. Unsurprisingly, these efforts reveal that individuals with I/DD and their families may experience disparities based on race, culture, language, ethnicity, disability, and/or geographic location. These may be disparities in access to information and services and/or culturally and linguistically appropriate service providers.¹

State systems of support for individuals with I/DD must be person-centered and this approach should take into account the cultural considerations of each unique individual supported and their families. The foundation of the person-centered practice in home and community-based services requires that state systems identify what is *important to* the person and what is *important for* the person. In fact, regulations

¹ We note that individuals with I/DD are also at great risk of experiencing disparities in accessing health and mental healthcare services (outside of the state I/DD service milieu). NASDDDS will provide additional information on strategies to mitigate the impact of those disparities under separate cover.

at 42 CFR 441.301(c)(1)(iv) (Centers for Medicare and Medicaid Services) require that the person-centered planning process reflect the cultural considerations of the individual. This means putting the person at the center of support planning and prioritizing their views, input, beliefs, desires, and goals.

Norms are then developed into behaviors that are socially acceptable that then influence our interactions in society. Cultural backgrounds influence how individuals perceive disability and how they wish to engage with various health care or support service providers. This includes interactions with State I/DD systems of support, HCBS service providers, case managers, healthcare providers, mental health providers, and others.



In order to address health disparities, it is imperative that states assess the demographic makeup individuals with I/DD accessing the service system and determine, through a self-assessment, who is and who is not accessing services and/or whether individuals from varying backgrounds have differences in their patterns of access and their experiences of care. The results of such data will help guide states to develop an action-oriented strategy to improve Diversity, Equity, Inclusion (DEI) throughout the I/DD service system to address barriers, improve access to services, and encourage culturally and linguistically appropriate supports. The National Core Indicators for Individuals with Intellectual and Developmental Disabilities (I/DD) Data Brief *What Do NCI Data Tell Us About Significant Racial & Ethnic Disparities Across Quality of Life & Health Domains?*² is an example of the type of data analysis that can be utilized to determine who the differences in access to services and the outcomes of service delivery within underserved and unserved populations. In addition to NCI and other experience of care data, states may examine existing administrative data sets to determine the veracity of those data in telling the story of cultural and linguistic differences within the state, and whether data gaps exist that can be improved. The analysis of such data should involve individuals of the communities being studied, to better understand the complex histories and potential cultural influences of the story that the data tells. Data collection and analysis is an important primary step of assessing an agency’s service delivery with a DEI lens, in addition to qualitative analysis of structural considerations and agency prioritizations.

To assist states in reflecting on their own strengths, NASDDDS has developed this self-assessment tool. States can use this tool to identify opportunities for growth in assuring a system of supports for individuals with I/DD that is equitable, inclusive, and diverse. This preliminary assessment tool will aid state I/DD agencies to hone DEI-related goals, and to develop plans to move forward with an Action-Oriented Plan.

An action-oriented plan may include such tasks as:

- 1 Devising a methodical review** of statutes, regulations, policies, procedures, and other information to ensure that they are both easily understood and are fully inclusive of all communities.

² Bradley, V., Hiersteiner, D., Goode, Tawara, Bonardi, A., Vegas, L et al. *What Do NCI Data Tell Us About Significant Racial & Ethnic Disparities Across Quality of Life & Health Domains?* National Core Indicators® Data Brief. February 2021.

- 2 **Addressing the need** for diverse staff and developing policies and processes that are culturally competent and inclusive of diverse communities.
- 3 **Developing policies** specific to training for state staff as well as service delivery system partners, such as provider and case management agencies. The training should be related to cultural humility, understanding both individual and institutional biases and processes to devising a person-centered plan that reflects cultural considerations of the individual and their families. Trainings for administrative staff and provider support staff should be offered and or/required that offer a better understanding of the complexities of various cultural norms, including the importance of learning about a community’s historical experiences as well as their current Social Determinants of Health that may be creating barriers to services provided by your agency.
- 4 **Assessing the primary languages** spoken in the state, and developing policies related to linguistic accommodation needs, inclusive of adaptation for family members - whether biological or chosen - and for support staff who may require linguistic supports to do their jobs.

The United States Department of Human Services, Office of Minority Health (OMH) has established standards for Culturally and Linguistically Appropriate Services (CLAS) to provide a blueprint to provide quality equitable outcomes for all individuals and their families. The fifteen standards and suggested implementation strategies are listed below.

The tool below serves as a crosswalk with specific considerations for State I/DD agencies as they review the CLAS standards against their service delivery system. The CLAS standards are broken into three overarching themes, and fifteen action steps to guide an organization in how to provide supports that are culturally and linguistically appropriate. While originally aimed at healthcare providers, the strategies contained herein are easily adaptable to long-term services and supports, and may additionally assist state I/DD agencies in working within their state infrastructure to broadly impact healthcare access as well.

This self-assessment tool is intended to assist you in identifying areas of systemic strength upon which you can build as it relates to the CLAS standards, while also identifying opportunities to continue your systemic growth to more fully meet the CLAS standards.

For optimal accuracy in results and to engage in meaningful discussion with key team members, NASDDDS recommends that states consider convening a diverse team of partners that includes an array of state staff, including upper management, and contract managers, as well as key community partners including direct service providers, supervisors, direct support professionals and other community partners. In addition to providing the fullest picture of your “current state”, this inclusive approach will build trust among key partners – an effort that will further strengthen any future action steps.



Action Oriented Tasks

Before the assessment is conducted, ensure that the team establishes a safe space and guiding principles for dialogue and inclusive conversations. Sometimes, conversations about race, ethnicity and culture can be difficult and making sure that you have established a welcoming environment for candid discussion is a key step of the process.



A list of common definitions and terms is available as an appendix to this tool. For best results, we recommend sharing these with your team to create a common understanding of terms and take the important step of developing a collective understanding of language to inform the completion of the assessment and establishment of action strategies. In addition, for your reference, a complete list of the CLAS Standards are also within the appendix of this document to guide your team in making recommendations and action steps that are

responsive to the diverse make up of your state’s population, health beliefs, and practices of complex individuals.

Finally, recommendations of suggested implementation strategies for each standard are offered for your team to consider for the initiatives that require new or on-going action steps that will support your team’s work embedding diversity, equity, and inclusion efforts into to your agency’s strategic planning, policies, and practices.

State I/DD agencies demonstrate they are valuing equity when they prioritize culturally appropriate care and commit to dismantling systemic processes that contribute to disparities for individuals with I/DD and their families. Completing a self-assessment exercise and developing an action agenda in collaboration with individuals and families is a further demonstration to communities that the state is committed to providing quality, equitable, and accessible services by eliminating barriers and biases.



Scoring Tool for Embedding Cultural & Linguistic Competency

Select your organization's current stage of incorporating each recommended practice both internally and externally. Consider the DEI Embedding Practice within the DD agency and then evaluate the practice within the DD service community inclusive of providers, supports coordination organizations, contractors, and partners.

Principle Standard CLAS (Culturally and Linguistically Appropriate Services)

Establish commitment to the overarching principal CLAS Standard: <i>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.</i>		State DD Agency	DD Community
5	There is written commitment to and use of the CLAS standards within regulation, policy, committee charters, etc.		
4	There is internal and external engagement about the CLAS standards and how to incorporate them, but no definitive plan.		
3	There is general training available to staff and community about CLAS principles.		
2	Recognize the CLAS standards and acknowledge them as a priority for health equity.		
1	Education and training are needed regarding CLAS standards.		

Governance, Leadership, and Workforce

Embed DEI initiatives into mission/vision and strategic plans. <i>Incorporating DEI Initiatives into mission/vision and strategic plans demonstrates an organization commitment both internally and externally.</i>		State DD Agency	DD Community
5	All mission, vision, value, and strategic plan guiding documents embed DEI initiatives informed by engagement with users of services, key collaborators, and partners and are regularly reviewed for relevancy.		
4	Engagement has started to modify mission, vision, value, and strategic plan guiding documents to include DEI initiatives.		
3	There is a plan and timeline to embed DEI initiatives into mission, vision, value, and strategic plan guiding documents.		
2	There is recognition that mission, vision, value, and strategic plan guiding documents must be revised to include DEI initiatives.		
1	All mission, vision, value, and strategic plan guiding documents are not inclusive of DEI initiatives.		

Identify a DEI leader who is responsible for supporting the organization(s) and staff to embed DEI work into all policy, practices, and organization's strategic plans.		State DD Agency	DD Community
<i>It is key that this is a staff person/resource to support other staff in incorporating DEI into the broader work of your system – not to be a standalone resource solely responsible for DEI initiatives.</i>			
5	There is a designated DEI leader(s) that actively supports embedding DEI work into all policy, practices, and strategic plans.		
4	There is a DEI champion and clear expectations for the leader's role and influence are under development.		
3	A plan and timeline have been developed to identify a champion for DEI		
2	There is recognition that a champion for DEI is essential to embed DEI into all facets of work.		
1	A champion for DEI responsible for supporting the organization(s) and staff to embed DEI work into all policy, practices, and organization's strategic plans has not been considered		

Create a diverse and multi-disciplinary advisory committee committed to the action steps.		State DD Agency	DD Community
<i>Consider ways to ensure a truly diverse group of individuals participates. For individuals with lived experiences and families, consider payment for time and/or any necessary accommodations to allow for meaningful input.</i>			
5	There is an active diverse and multi-disciplinary advisory committee that has a charter and action plan to inform DEI practices.		
4	The DEI advisory committee is in its early stages and is beginning to develop an action plan to improve DEI practices.		
3	There is engagement with collaborators and partners to establish a DEI advisory committee.		
2	The need for an advisory committee is considered yet no steps have been taken to establish it.		
1	There is no advisory committee with a DEI focus.		

Post job descriptions in multiple languages and in local community media that serves and works with community institutions providing supports and resources. <i>These strategies can be key for state-level recruiting. For your partners in provider and case management agencies, elevate and amplify strong recruitment practices in use across the state to reach underserved and/or underrepresented communities to bring their voice to the workforce.</i>	State DD Agency	DD Community
5 All job descriptions and recruitment information are published in multiple languages, available in accessible formats, and disseminated in numerous channels including local community media that services and works within the DD system of supports and resources.		
4 Select job descriptions are available in English and Spanish with work afoot to translate all job descriptions and diverse communication channels have been identified.		
3 Work is underway with human resource professionals to modify job descriptions and create distribution channels through various representative communities.		
2 There is recognition that work needs to be done to reformat job descriptions using multiple languages and reach broader communities.		
1 Job descriptions are only in English and are posted only through traditional communication channels.		

Develop a comprehensive DEI Implementation Plan that promotes the CLAS Standards in policy, practices, and allocated resources. <i>For state systems, this plan may necessarily be multi-level, including what the state can do internally organizationally, and how the state can support system partners to take similar strides to improve DEI.</i>	State DD Agency	DD Community
5 A comprehensive and transparent DEI plan is actively implemented to promote the CLAS standards, engage users of services and their supporters, and is regularly discussed as part of ongoing organizational management and quality improvement.		
4 A DEI implementation plan is completed yet work to move it forward is challenging or has stalled.		
3 Work is initiated to develop a DEI implementation plan, inclusive of input from users of services and other organizational partners.		
2 There is acknowledgement that a plan is needed to meaningful implement DEI and the CLAS standards.		
1 There is not a specific plan focused on DEI implementation of the CLAS standards.		

Recruit, promote, and support a culturally and linguistically diverse governance, leadership, and workforce that are responsive to the population in your state.		State DD Agency	DD Community
<i>Creating a diverse leadership, and workforce that is reflective of the demographic makeup of your state will enhance diverse perspectives when establishing processes or policies for equitable services.</i>			
5	All aspects of the organization’s governance, leadership, and workforce are responsive to and representative of the state’s population.		
4	There is representation of cultural and linguistic diversity within some aspects of organizational governance but needs to be broadly implemented throughout the organization.		
3	Strategies to assure cultural and linguistic diversity representative of the state’s population are developed without implementation to-date.		
2	There is awareness of the cultural and linguistic diversity of the state but no action to incorporate those needs into the organization’s governance.		
1	Activities to recruit, promote, and support a culturally and linguistically diverse governance, leadership, and workforce that are responsive to the population in your state are not in place.		

Identify a budget specific to your CLAS/DEI work.		State DD Agency	DD Community
<i>Given the nature of State I/DD systems, this may require a multi-level, multi-year approach to ensure horizontal and vertical investments.</i>			
5	Budgets have funds dedicated to CLAS/DEI work sufficient to demonstrate a commitment to comprehensive efforts to address and improve diversity, equity, and inclusion.		
4	The budgeting process now includes plans to dedicate resources to CLAS/DEI work but various approvals are required to approve the budget.		
3	Some funds within existing resources have been leveraged to support CLAS/DEI work but there is not a permanent source of funds within the budget.		
2	There is recognition that the dedication of funds is necessary to demonstrate a commitment to and completion of CLAS/DEI work, but action is needed to begin the process of allocating financial resources.		
1	Budget documents do not include line items or subcategories for CLAS/DEI work.		

Communication and Language Assistance

Educate leadership, staff, and encourage contract providers to provide education in culturally and linguistically appropriate policies and procedures. <i>In addition to internal education strategies, consider effective ways of incentivizing partners (including, in some instances, making resources available) to ensure that partners in your service system are similarly embedding DEI into their work and interactions with individuals and families.</i>		State DD Agency	DD Community
5	All education materials are inclusive of culturally and linguistically appropriate policies and practices and all components of education are informed by individuals and/or families who use services.		
4	Some education materials are updated to include concepts of culturally and linguistically appropriate policy and procedures with ongoing efforts to update all materials within an agreed upon timeline.		
3	There is a plan to make changes to education materials in a phased approach so that there is a common understanding of culturally and linguistically appropriate priorities, policies, and practices.		
2	There is acknowledgement that education efforts need updates to include culturally and linguistically appropriate concepts, but action is needed to begin planning and implementing change.		
1	Current education of staff, providers, or partners does not have a focus on policies and practices that are culturally and linguistically appropriate.		

<p>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. Ensure staff at all levels are aware of the accommodations and how to access the services; establish policy/procedures into contracts of direct service providers.</p> <p><i>This may mean directly securing translation and interpreter services for state-to-individual interactions (such as eligibility, etc.) and may require strategies to compensate providers for service provision in alternative languages/formats. This may necessitate identifying financing strategies, including Federal administrative claiming and/or modified service rates to account for varying skill level among providers/staff rendering services.</i></p>	State DD Agency	DD Community
<p>5 There are resources dedicated and available to support multiple languages and communication assistance needs and staff and community members are fully educated on formal channels for language and communication support to assure timely access to services.</p>		
<p>4 Language and communication assistance are implemented on a small scale with efforts in place to expand the number of language and communication resources that align with state need, including the education of staff and the community.</p>		
<p>3 A plan is developed to assure access to language and communication assistance and collaboration is underway to implement the plan for formalizing the resources and educating staff and the community about their availability.</p>		
<p>2 There is awareness of the need to secure language and communication assistance, but specifics have yet to be identified.</p>		
<p>1 There are no formal opportunities for language assistance.</p>		

<p>Complete an organizational assessment of language assistance services to determine effectiveness and efficiency and embed assessment into the contract of direct service providers.</p> <p><i>A comprehensive assessment of the primary languages spoken and the accommodations currently in place will help determine the gaps and next steps to equitable services. Language barriers create ineffective and inefficient outcomes.</i></p>	State DD Agency	DD Community
<p>5 There is a standardized process for regularly assessing the availability, effectiveness, and efficiency of language assistance services, informed by people who use services and families.</p>		
<p>4 An assessment of language assistance services in underway with plans to standardize a process to regularly determine the availability, effectiveness, and efficiency of language assistance.</p>		
<p>3 A tool and/or process has been identified to conduct an assessment of language assistance services.</p>		
<p>2 There is acknowledgement of the importance of periodically assessing language assistance services, but no current activity to do so.</p>		
<p>1 There is no action to conduct an assessment of language assistance services.</p>		

Provide financial compensation to staff who complete interpreter trainings and certifications to provide competent language assistance.		State DD Agency	DD Community
<i>Compensation for a skill such as multi-lingual or ASL sign language knowledge should be compensated. It is a skill that you would typically outsource that many staff are able to contribute to your organization.</i>			
5	Financial compensation is provided to staff who complete interpreter trainings and certifications to provide competent language assistance.		
4	A process has been developed to provide financial compensation to staff who complete interpreter trainings and certifications to provide competent language assistance.		
3	There is a plan to provide financial compensation to staff who complete interpreter trainings and certifications to provide competent language assistance.		
2	There is recognition that financial compensation should be provided to staff who complete interpreter trainings and certifications to provide competent language assistance.		
1	There is no financial compensation for staff who complete interpreter trainings and certifications.		

Formalize processes for translating materials into languages other than English. Embed annual evaluations into the quality of the services.		State DD Agency	DD Community
<i>Embedding a process for translation will standardize the practice and create an organization commitment both internally and externally.</i>			
5	Materials are translated into languages other than English through a formalized process. Annual evaluations are embedded into the quality of the services.		
4	A formalized process to ensure materials are translated into languages has been developed. There is a formal process to embed annual evaluations into the quality of the services.		
3	A plan to develop a formalized process for translating materials into languages other than English is in place. There is also a plan to embed annual evaluations into the quality of the services.		
2	There is an understanding that a formal process is needed to ensure materials are translated into languages other than English. There is a recognition that annual evaluations should be embedded into the quality of the services.		
1	There is no process for translating materials into languages other than English. Annual evaluations are not embedded into the quality of these services.		

Engagement, Continuous Improvement, and Accountability

Incorporate DEI measurements into the organization’s employee work evaluations and into your contractor’s scope of work.		State DD Agency	DD Community
<i>Create a DEI goal in your employee’s evaluations as well as your contractor’s scope of work creates a accountability and opportunity for celebration.</i>			
5	DEI measurements are consistently incorporated into employee work evaluations, provider agreements, and contractor’s scope of work at the state and local levels.		
4	A formal policy has been developed and implemented to ensure DEI measurements are incorporated into the organization’s employee work evaluations, provider agreements, and contractor’s scope of work at the state and local levels		
3	There is a plan to incorporate DEI measurements into the organization’s employee work evaluations, provider agreements, and contractor’s scope of work at the state and local levels.		
2	There is acknowledgement that DEI measurements should be incorporated into the organization’s employee evaluations, provider agreements, and contractor’s scope of work at the state and local levels.		
1	There are no DEI measures in employee evaluations, provider agreements, and contractor’s scope of work at the state and local levels.		

Collect race, ethnicity, and language (REAL) data from individuals receiving, seeking access, and not being served.		State DD Agency	DD Community
<i>Data collection is a key component to determining where there are gaps in services and who is not being served.</i>			
5	Race, ethnicity, and language (REAL) data is systematically collected from individuals receiving, seeking access and not being served. The data is analyzed regularly by both internal staff and external partners representative of communities being analyzed.		
4	There are processes in place to collect race, ethnicity, and language data from individuals receiving, seeking access, and not being served, but not being fully implemented.		
3	Strategies to collect REAL data from individuals receiving, seeking access, and not being services are under development.		
2	There is understanding and agreement that REAL data should be collected from individuals receiving, seeking access and not being served.		
1	There is no data regarding race, ethnicity, or language being collected from people seeking services, seeking access, or not being served.		

Use REAL data to identify needs, trends, and improve care, access and establish culturally relevant services.		State DD Agency	DD Community
<i>When analyzing data, engage leaders from various communities to help tell the story and offer solutions.</i>			
5	There are REAL data to identify the needs of individuals being supported, actions based on the findings, and inclusion of various communities to analyze trends and create process improvements.		
4	There is some data collection to identify needs and improve access, but they need refinement to meet intended outcomes.		
3	A plan is under development to capture data that can tell us about the support needs of individuals in our service system.		
2	There is understanding that we need to capture data to ensure we can identify trends and develop culturally relevant services.		
1	There is no data analysis regarding individual needs, access, and culturally relevant services to identify trends.		

Collaborate with community partners to analyze health data collection and interpret data for reliability and validity.		State DD Agency	DD Community
<i>Transparency and inclusion of community partners creates allyship and relationships for future initiatives.</i>			
5	Robust health data is collected to understand the conditions in environments that affect health and there is ongoing collaboration with community partners across sectors to understand the characteristics of high-risk populations.		
4	There is health data collection and collaboration with community partners, but there is a need to make improvements to visualize and identify the drivers of health inequities.		
3	There is collection of health data but there is a need to broaden the approaches to collaborate with community partners to improve the usefulness of that data.		
2	There is no collection of health data but there is work to develop new approaches and data management activities in order to understand the conditions in people’s environments that affect a wide range of health outcomes.		
1	1 – We do not collect health data or collaborate with community partners to assess its reliability and validity.		

Consider utilizing trained staff as cultural outreach coordinators to help with community engagement.		State DD Agency	DD Community
<i>Our greatest asset is our knowledgeable staff who live and share space within our communities. Many can offer insight to community cultural norms, local organizations that have established trusting relationships and who are a 'go-to' for information.</i>			
5	There is comprehensive training for staff that function as cultural outreach coordinators that partner with communities to understand their diverse cultural contexts. Transparency is a high priority and partners are consistently updated on our ongoing commitment to DEI.		
4	Staff that function as cultural outreach coordinators are trained, but there is identification of better strategies to empower communities to facilitate involvement, while being sensitive to the differences in each community.		
3	There is currently work on embedding strategies and responsibilities that include current staff to seek out and facilitate the involvement of diverse community partners.		
2	Discussions are taking place about the importance of having trained staff as cultural outreach coordinators to increase visibility to better understand the issues that diverse communities face.		
1	Staff that function as cultural outreach coordinators are not trained to engage with communities to help understand the differences in those communities.		

Partner with community organizations to lead discussions and provide input on progress related to your DEI/CLAS focused action plan.		State DD Agency	DD Community
<i>Community Partners appreciate updates, and it establishes an trusting relationship with organizations who can contribute to DEI Initiatives at a local level.</i>			
5	There is partnership with community organizations on a regular basis related to DEI/CLAS action plans so that important insights into all challenges and opportunities are gained.		
4	There is partnership with community organizations related to the DEI/CLAS action plan, but there is an aim to enhance the depth of that participation.		
3	There is partnership with community organizations, but there are changes in process to focus on contributions to DEI initiatives by inviting a wide range of community members and inclusive engagement.		
2	There is a plan to partner with community organizations to support the sharing of information by a broad representation of community members.		
1	There is no plan established to partner with community organizations who can contribute to DEI initiatives.		



Embedding Cultural & Linguistic Competency Implementation Strategies

Your state I/DD team can consider these implementation strategies to help meet the action items that your organization has started, or that you will prioritize as a result of completing the Scoring Tool for Embedding Cultural & Linguistic Competency.

IMPLEMENTATION STRATEGIES

- ✓ **Establish genuine, trust-based relationships with community leaders**
Be present in the community and contribute to their initiatives before asking them to contribute to yours. For State I/DD agencies, this may mean engaging with local/regional entities and/or faith-based communities to build relationships with trusted community members.
- ✓ **Engage diverse individuals with lived experience, family, and members of the community**
Keep in mind that many communities prefer to show up in pairs or small groups. If you want inclusion, support their needs. They recognize their own diversity within their communities or ethnic groups and prefer not to be the voice for all. For state I/DD agencies, this might mean participating in an already established community meeting to gain input from specific groups or it may mean offering open invitations to in person or virtual meetings, including offering support and/or respite to enable families to participate.
- ✓ **Ensure that individuals with lived experiences are invited and supported to collaborate**
This includes accommodating linguistic supports, providing transportation, respite care, day care for dependents or personal care for the individual participating.
- ✓ **Consider the physical environment's meeting space**
Does it feel inviting and respectful for diverse cultures? Is it a good idea to choose a meeting place that is within the community that they feel safe and familiar with.
- ✓ **Consider virtual meetings as an efficient way to operate business**
Because we are relying on them more and more, it is important to consider accommodations within our virtual meeting spaces. (Insert link to vetted resource)
- ✓ **Develop covenants together**
These covenants need to support meaningful and inclusive dialogue and capture that dialogue in well documented notes with trackable measures to reinforce the contributions of everyone.
- ✓ **Examine common terms and their definitions**
Provide a list of common words and their definitions that may be used when working together and commit to adding and disseminating updates to your list.
- ✓ **Develop a communication and sustainability plan together**
Create a diverse communication plan that includes various channels to disseminate information and updates that are in plain language.

- ✓ **Take logistics into account**
Consider childcare, food, time of the day, location/distance and accessibility when scheduling community engagement meetings.
- ✓ **Determine material needs**
Decide who may need materials in advance, as well as pre or post meeting support. And develop a virtual location for everyone to have access to materials.
- ✓ **Establish a diverse workgroup**
The group should be inclusive of all levels of your personnel and engage individuals and their families to examine the mission and vision and establish an organizational commitment to cultural and linguistic accommodations.
- ✓ **Consider leadership**
Rotate leadership duties to allow for different leaders to emerge within your organization.
- ✓ **Undertake a methodical review of:**
 - Statutes
 - Regulations
 - Policies
 - Procedures
 - Communication protocols
- ✓ **Review internal and external practices**
 - Consider diversifying your workforce to include individuals who understand cultural needs and speak top languages in your state.
 - Be mindful that leadership within an organization must be diverse in order to engage different perspectives. This includes race, ethnicity, gender, age, urban, rural, and individuals with disabilities. These identifiers are only some of the cultural considerations for diversifying staff, boards, commissions, workgroups and committees.
 - Evaluate culturally and linguistically appropriate policies and practices, at least annually. Covid laid bare the quick changes of demographic and socio-economic needs that our communities can be exposed to. Evaluating your policies and processes to align with current community priorities will lead on a path to establishing trust with individuals with I/DD, their families and the communities.
 - Create a Diversity, Equity and Inclusion Plan that is transparent and includes deadlines for activities.
 - Add DEI to your standing meeting agendas and invite staff contribution of successes or current challenges.
 - Consider adding a DEI goal to staff's Annual Performance reviews.
 - Embed a CLAS Standards Checklist into your annual strategic plan and assign a diverse committee to monitor and contribute reports to all personnel.
 - Identify a budget specific to your CLAS/DEI work.
 - Evaluate process and procedures to ensure that they are inclusive of different cultural needs and to identify and address any barriers.

- ✓ **Consider needed language support**
 - Provide language assistance by translators for the individual being served or for family members contributing to the Person-Centered Planning processes.
 - Make accommodations for people who do not communicate verbally or who are deaf and prefer a sign language interpreter.
 - Train staff on language assistance and the process to obtain the services.
 - Include the availability of language assistance on your documents that go home with the individual and their family.
 - Post language access in common areas.
 - Investigate language interpreter's credentials and ensure that they understand health care terms.
 - Ensure that language interpreters have an understanding of the culture of the person being served to determine if a concept is translatable. Often times a translator will need to explain a concept and relate the person's culture.
 - Translate materials into the top five languages of your state.
 - Keep materials to a 5th grade level to assist with concept translation.
 - Use Plain Language
 - Consider using pictures to tell your story.
 - Include definitions for complex words. Health literacy is important to ensure individuals and their families understand the terms being used and have a clear definition to better incorporate the new words into their vocabulary.
 - Accommodate the sensitivities some individuals have to various colors by using basic colors or minimizing use of color so that documents are legible.

- ✓ **Engage with the full community**
 - Invite public feedback.
 - Involve the community in data collections.
 - Empower the community to have the tools and resources to support and serve individuals with I/DD and their family.
 - Support community engagement and provide resources to the community to make events, meetings, and activities accessible to all.
 - Follow through and deliver when you make a promise to the community.
 - Engage community leaders to better understand community priorities and community culture.
 - Seek input regularly from the community regarding current needs and trends.
 - Invite individuals with lived experiences, community, family, and support staff to evaluate policies, processes and services being provided to ensure they are culturally appropriate.
 - Create a process for anonymous feedback.
 - Create a process for conflict and grievance and include this information in documents that will be taken home for future reference.
 - Consider an outward facing 'dashboard' to highlight goals, accomplishments, and ongoing commitments.
 - Add a DEI update to newsletters, websites, social media platforms and ensure all of these are in plain language and translated into various languages.

RESOURCES

Centers for Medicare and Medicaid Services . (n.d.). 42 CFR 441.301(c)(1)(iv). *46 FR 48541, Oct. 1, 1981, as amended at 50 FR 10026, Mar. 13, 1985; 59 FR 37717, July 25, 1994; 65 FR 60107, Oct. 10, 2000.*

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