National CLAS Standards and COA Accreditation Standards Crosswalk

COA Accreditation EDI Standards	Applicable CLAS Standards[1]
ASE 2.05 The environment promotes a non-threatening, welcoming, and inclusive approach that fosters trust and engagement for all people. **Interpretation:** Programs should provide a supportive, safe, and welcoming environment for all people. Programs can help to signal that they provide an environment that is safe and welcoming by posting "visual cues" of their commitment to equity, diversity, and inclusion in the reception or common area, such as a copy of the nondiscrimination policy, a copy of the equity statement, culturally diverse décor, LGBTQ+ symbols, or poster and stickers promoting racial justice.	• CLAS Standard 1
ASE 2.06 Organization policy prohibits activities or interventions that are harassing, threatening, or otherwise harmful to an individual's well-being. **Interpretation: The activities or interventions that will be prohibited by organization policy may vary based on service type, population served, and the service delivery setting but should include, as appropriate:**	• CLAS Standard 1

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[1] . U.S. Department of Health and Human Services, Office of Minority Health (2013). *National standards for culturally and linguistically appropriate services (CLAS) in health and health care*. Retrieved from https://thinkculturalhealth.hhs.gov/assets/pdfs/EnhancedNationalCLASStandards.pdf

COA Accreditation EDI Standards	Applicable CLAS Standards[1]
a. corporal punishment; b. the use of aversive stimuli and/or therapies; c. interventions that involve withholding nutrition or hydration, or that inflict physical or psychological pain; d. the use of demeaning, shaming, degrading, or bullying language or activities; e. forced physical exercise to eliminate behaviors; f. unnecessarily punitive restrictions, including restricting family contact, celebrations, or prescribed treatment interventions as a disciplinary action; g. unwarranted use of invasive procedures or activities as a disciplinary action; h. punitive work assignments; i. punishment by peers; j. conversion or reparative therapies; k. deliberate misgendering; l. disciplinary room confinement; and m. group punishment or discipline for individual behavior.	
RPM 6.01 The organization: a. establishes a system of standardized contracting practices; b. pursues contracts that serve the organization's and service recipient's best interests, not private interests; c. seeks opportunities to source goods and services from diverse suppliers; d. conducts due diligence in contracting activities including review of possible risks; e. uses competitive bidding, when applicable; and f. ensures governing body review of significant contracts.	• CLAS Standard 1
GOV 2.04 The organization develops an equity statement outlining its commitment to equity, diversity, and inclusion that is shared with its stakeholders. **Interpretation:** The equity statement should reflect the organization's history, connect EDI to its mission, and outline how the organization demonstrates its commitment to equity, diversity, and inclusion.	• CLAS Standard 2

COA Accreditation EDI Standards	Applicable CLAS Standards[1]

GOV 3.04
The governing body:
   a. reflects the demographics of the community it serves;
   b. represents the interests of the community it serves;
   c. serves as a link between the organization and the public or community; and
   d. is sufficiently diverse in strengths and capabilities to plan and deliver appropriate services to its defined community.
 	
Interpretation: Board recruitment is a significant challenge for many organizations and meeting the standard may be a long-term process. In the interim, an organization can establish a stakeholder advisory group that is representative of the community and include strategies for plan for strengthening its Board in its long-term or strategic plan.
	• CLAS Standard 3
	• CLAS Standard 13

GOV 4.03 Governing body members receive an orientation that addresses membership responsibilities and an overview of the organization and its mission. **Examples:** The board orientation may include: information on the organization's history, goals, and objectives; governing body structure and procedures; ethics; programs and activities; introductions to staff; equity, diversity, and inclusion training; and facility and program tours.	• CLAS Standard 4
GOV 4.04 All governing body members participate in equity, diversity, and inclusion training at least every two years. **Examples:** In order to best engage governing board members, organizations can connect EDI training to the mission of the organization and the desired outcomes of its programs.	• CLAS Standard 4
HR 1 The organization assesses its workforce as part of annual planning and prepares for future needs by: a. comparing the composition of its current workforce, including number of employees, skills, demographics, and cultural characteristics, with projected workforce needs; and	• CLAS Standard 3

COA Accreditation EDI Standards	Applicable CLAS Standards[1]

b. determining how to close gaps, when needed, through recruitment, training, leadership development, and/or outsourcing.
 	
Examples: To address employment or leadership selection patterns that do not reflect the community served, organizations may establish a plan that includes:
   a. targeted recruitment goals and strategies;
   b. reviewing policies and criteria to identify factors that may pose systemic obstacles to employment or advancement; and
   c. equitable leadership and personnel development programs.
 	
Leadership development programming can include, but is not limited to: trainings, degree or certificate programs, review of relevant professional literature or research, shadowing, additional assignments to develop new skills, leadership mentoring, and exposure to functions outside the individual's current role.
 	
Organizations can promote equitable access to leadership development programs by setting transparent, objective, performance-driven eligibility criteria and considering conflicts with job responsibilities when planning activities.	

HR 2.01
Job descriptions and selection criteria:
   a. state the credentials, job expectations, core competencies, essential functions, and responsibilities for each position or group of like positions;
   b. include inclusive language and demonstrate of the organization's commitment to equity, diversity, and inclusion;
   c. include sensitivity to the service population's cultural and socioeconomic characteristics; and
   d. are reviewed and updated regularly to evaluate their continued relevancy against the needs and goals of the organization's programs and persons served.
 	
Examples: Credentials can include, for example:
   a. education;
   b. training;
   c. relevant experience;
   d. competence in required role;
	• CLAS Standard 3

COA Accreditation EDI Standards	Applicable CLAS Standards[1]
e. recommendations of peers and former employers; and f. any available state registration, licensing, or certification for the respective disciplines. **Examples:** Examples of inclusive language in job descriptions can include: a. language regarding accommodation for different abilities; b. neutral language to eliminate age, cultural, racial, and gender biases; and c. highlighting inclusive benefits that support a diverse workforce directly in the job description.	
HR 2.02 Recruitment and selection procedures include: a. notifying personnel of available positions; b. verifying past employment and credentials; c. providing applicants with a written job description; d. giving final candidates the opportunity to speak with currently-employed personnel; e. using standard interview questions that comply with employment and labor laws; and f. using diverse interview panels. **Examples:** Diverse panels with representatives from different backgrounds, departments, and seniority levels offer new perspectives, encourage organizations to think broadly and inclusively, and minimize bias.	• CLAS Standard 3
HR 3.01 The organization annually measures personnel satisfaction and retention and takes action to address identified satisfaction and retention concerns. **Interpretation:** The aggregation of data reduces the risk of disclosing personal identifiable information in most instances; however, risk of disclosure still exists particularly when data is being disaggregated and unique or easily observable characteristics might allow someone to be identified in the data set. As such, data collection and reporting procedures should include mechanisms for avoiding such disclosure such as data suppression, rounding, reporting in ranges rather than exact counts, combining sub-groups into larger groups, etc.	• CLAS Standard 3

COA Accreditation EDI Standards	Applicable CLAS Standards[1]

Examples: Disaggregated data can be useful in addressing identified satisfaction, retention, turnover, hiring, and promotion concerns. Common characteristics used to disaggregate data include:
   a. race and ethnicity/country of origin;
   b. generation status;
   c. immigrant/refugee status;
   d. age group;
   e. sexual orientation; and
   f. gender/gender identity.	

HR 3.02
All personnel confirm receipt of a personnel policies and procedures manual that articulates current:
   a. conditions of employment;
   b. benefits;
   c. rights and responsibilities of employees; and
   d. other important employment-related information.
 	
Examples: Policies and procedures that are commonly addressed in a personnel manual include:
   a. the organization's equity statement;
   b. conditions and procedures for layoffs;
   c. emergency and safety procedures;
   d. equal employment policies;
   e. harassment and discrimination;
   f. nepotism and favoritism protections;
   g. grievance process procedures;
   h. insurance protections including unemployment, disability, medical care, and malpractice liability;
   i. performance review system;
   j. promotions;
   k. professional development;
   l. standards of conduct;
   m. time-off policies;
	• CLAS Standard 3
	• CLAS Standard 4
	• CLAS Standard 14

COA Accreditation EDI Standards	Applicable CLAS Standards[1]
n. wage policy; o. working conditions; p. technology/network security and usage policies; and q. the use of social media, electronic communications, and mobile devices.	
HR 3.03 The organization reviews and updates the personnel policies and procedures manual every two years with an equity, diversity, and inclusion lens to ensure the manual remains up-to-date and promotes equity throughout the organization.	• CLAS Standard 2
HR 4.02 Staff performance reviews emphasize self-development and professional growth and include: a. specific expectations defined in the job description; b. organization-wide expectations for personnel; c. objectives established in the most recent review, accomplishments and challenges since the last review period, and objectives for future performance, including developmental and professional objectives; d. strategies to continue developing cultural humility; e. recommendations for training; and f. an assessment of the staff member's knowledge and competence related to the characteristics and needs of service recipients, if applicable.	• CLAS Standard 3 • CLAS Standard 4
TS 1.01 A personnel development plan: a. is reviewed annually and revised in accord with an assessment of the organization's training needs; b. incorporates a variety of educational methods; c. is responsive to the history, cultural backgrounds, and related needs of personnel; d. outlines specific competency expectations for each job category; e. provides opportunities for personnel to fulfill the continuing education requirements of their respective professions; f. provides opportunities to support advancement within the organization and profession; and g. provides opportunities for personnel to practice cultural humility.	• CLAS Standard 4

COA Accreditation EDI Standards	Applicable CLAS Standards[1]

Examples: Educational methods can include, but are not limited to:
   a. interactive classroom trainings;
   b. webinars, self-paced trainings, or other computer-assisted training models;
   c. coaching; and
   d. structured peer support opportunities.
 	
Examples: Examples of opportunities for personnel to practice cultural humility can include:
   a. lunch-and-learns, webinars, or lectures;
   b. facilitated conversations;
   c. employee resource groups; and
   d. resource sharing.	

TS 1.02 New personnel are oriented within the first three months of hire to the organization's mission, philosophy, goals, and services.	• CLAS Standard 4

TS 2.03
Direct service personnel receive training on:
   a. communicating respectfully and effectively with service recipients;
   b. engaging service recipients, including building trust, establishing rapport, and developing a professional relationship;
   c. understanding the science of trauma and the impact of trauma on individuals, families, and personnel; and
   d. trauma-informed care, including screening, assessment, and service delivery practices.
	• CLAS Standard 4

TS 2.04
Training for direct service personnel addresses differences within the organization's service population, as appropriate to the type of service being provided, including:
   a. interventions that address cultural and socioeconomic factors in service delivery;
   b. the role cultural identity plays in motivating human behavior;
	• CLAS Standard 4

COA Accreditation EDI Standards	Applicable CLAS Standards[1]
c. procedures for working with non-English speaking persons or individuals with communication impairments; d. understanding explicit and implicit bias and discrimination; e. recognizing individuals and families with special needs; f. the needs of individuals and families in crisis, including recognizing and responding to a mental health crisis; g. the needs of victims of violence, abuse, or neglect and their family members; and h. basic health and medical needs of the service population.	
TS 2.05 Direct service personnel are trained on, or demonstrate competency in, providing inclusive care to individuals with intellectual and developmental disabilities including: a. communication techniques; b. de-escalation techniques for individuals with intellectual and developmental disabilities; and c. implementing the principles of self-determination and inclusion.	• CLAS Standard 4
CR 1.03 People have the right to ethical and equitable treatment including: a. the right to receive services in a non-discriminatory manner; b. the consistent enforcement of program rules and expectations; and c. the right to receive inclusive services that are respectful of, and responsive to, cultural and linguistic diversity. **Examples:** One way organizations can be responsive to the unique, culturally-defined needs of persons and families being served is by ensuring that program information, signs, posters, printed material, electronic and multimedia communications, and trainings are available and presented: a. in the language(s) of the major population groups served; and b. in a manner that is non-discriminatory and non-stigmatizing.	• CLAS Standard 1 • CLAS Standard 5 • CLAS Standard 8
CR 1.01 All persons served receive, and are helped to understand, information about their rights and responsibilities that is: a. provided in writing; b. distributed during their initial contact;	• CLAS Standard 6 • CLAS Standard 8 • CLAS Standard 14

COA Accreditation EDI Standards	Applicable CLAS Standards[1]
c. available in the major languages of the defined service population; d. effectively and appropriately communicated to persons with special needs; and e. posted in the reception or common area of each service delivery site or residential facility.	
ASE 3.03 The organization accommodates the written and oral communication needs of clients by: a. communicating, in writing and orally, in the languages of the major population groups served; b. providing, or arranging for, bilingual personnel or translators or arranging for the use of communication technology, as needed; c. providing telephone amplification, sign language services, or other communication methods for deaf or hard of hearing persons; d. providing, or arranging for, communication assistance for persons with special needs who have difficulty making their service needs known; and e. considering the person's literacy level. **Examples:** Examples of ways the organization can demonstrate standard implementation include, but are not limited to: a. providing basic program information in languages representative of consumer groups; b. proactively reaching out to ensure that all individuals can use its services and fully participate in planning; c. hiring sufficient numbers of bilingual personnel for all programs in which confidential interpersonal communication is necessary for adequate service delivery; d. ensuring there is a bilingual worker on staff for each language group large enough to comprise an average-sized caseload; e. offering trained translators or interpreters in non-counseling services when bilingual personnel are not available without depending upon children or other individuals unable to maintain the integrity of the individual-provider relationship; and f. using assistive technology, such as amplification for hard of hearing persons or a language telephone line, when appropriate.	• CLAS Standard 1 • CLAS Standard 5 • CLAS Standard 7 • CLAS Standard 8

COA Accreditation EDI Standards	Applicable CLAS Standards[1]

GOV 2.02
The governing body reviews and approves the long-term strategic plan to ensure that it encompasses:
    a. a review of the organization's mission, values, mandates, and strategic direction;
    b. a review of the demographics of its defined service population;
    c. an assessment of strengths and weaknesses;
    d. an assessment of equity, diversity, and inclusion strategies;
    e. measurable goals and objectives that support fulfillment of its mission and mandated responsibilities; and
    f. appropriate strategies for meeting identified goals, including the need to redirect, eliminate, or expand services to respond to changing community demographics and the needs of persons served.
	• CLAS Standard 2
	• CLAS Standard 9
	• CLAS Standard 10
	• CLAS Standard 11

GOV 2.03
The organization develops and implements an annual plan that supports its mission and integrates the priorities and objectives of each of its departments and programs, and:
    a. operationalizes the goals and objectives of the long-term strategic plan;
    b. reflects changing conditions and needs such as, resource allocation, funding, and regulatory changes; and
    c. responds to information from PQI activities.
 	
Examples: Annual plans can also incorporate other regular planning processes, including:
    a. HR planning;
    b. evaluation of training needs;
    c. budget planning;
    d. technology and information management planning; and
    e. PQI summary reports.
	• CLAS Standard 2
	• CLAS Standard 9

FIN 4.01
The annual planning and budget cycle includes participation of management, the governing body, program personnel, and other relevant stakeholders and is based on:
    a. the organization's mission and strategic priorities;
    b. performance improvement and outcomes data;
	• CLAS Standard 2

COA Accreditation EDI Standards	Applicable CLAS Standards[1]
c. direct and indirect operating expenditures; d. contractual requirements; e. changing costs and conditions; and f. anticipated revenue for the program year. **Examples:** Performance improvement and outcomes data in this context refers to the use of program and client outcomes data in planning and budgeting decisions. Such data may be used, for example, to direct available resources toward programs or interventions that have the strongest impact on individuals and families served.	
PQI 3.03 The organization identifies measures for management and operational performance to: a. measure progress toward achieving its mission and strategic and annual goals; b. evaluate operational functions that influence the capacity to deliver services and meet the needs of persons served; and c. identify and mitigate risk. **Examples:** Examples of operations and management performance measures can include: a. efficiency in the allocation and utilization of its human and financial resources to further the achievement of organizational objectives; b. effectiveness of risk prevention measures; c. effectiveness at retaining a competent and qualified workforce through staff retention/turnover and satisfaction; d. costs versus benefits of fundraising efforts; e. achievement of budgetary objectives; f. effectiveness of community education and outreach; and g. efforts to diversify the governing body, leadership, or workforce.	• CLAS Standard 10
GOV 3.02 **The organization conducts ongoing community outreach and education to:** **a. communicate its mission, role, functions, capacities, and scope of services;** b. provide information about the strengths, needs, and challenges of the individuals, families, and groups it serves; c. build community support and presence and maintain effective partnerships; and d. elicit feedback as to unmet needs in the community.	• CLAS Standard 12

COA Accreditation EDI Standards	Applicable CLAS Standards[1]

GOV 3.03
The organization collaborates with community members and persons served to address unmet needs in the community and advocate for issues of mutual concern consistent with the organization's mission, such as:
    a. **improvements to existing services;**
    b. filling gaps in service to offer a full array of community supports;
    c. the full and appropriate implementation of applicable laws and regulations regarding issues concerning the service population;
    d. improved support and accommodations for people with special needs;
    e. improved access to needed services for underserved populations and marginalized communities;
    f. solutions to community-specific needs including racial equity and cultural and linguistic diversity;
    g. service coordination; and
    h. a coordinated community response to public health emergencies.
 	
Examples: The organization can work at several levels to advocate with, and on behalf of, persons, groups, and families served. For example, direct service personnel can be given the time to carry out advocacy activities so they can support persons and families served to solve problems related to their individual cases. Advisory board members, management, and other personnel, along with persons served, can engage in legislative and other system-wide advocacy activities. They may also work collaboratively with other community organizations to monitor federal, state, and/or local activity that impacts the service population.
	• CLAS Standard 12
	• CLAS Standard 13

GOV 3.05 The organization provides persons served with meaningful opportunities to influence the design, delivery, and evaluation of its programs and services. **Examples:** Organizations can involve persons served by, for example (1) seeking input during house or community meetings, when applicable; (2) soliciting feedback through satisfaction surveys as required by PQI 3.02; (3) establishing advisory councils; (4) reserving seats on the board for individuals with lived experience and their families; (5)	• CLAS Standard 13

COA Accreditation EDI Standards	Applicable CLAS Standards[1]
inviting persons served to play a role in orienting newcomers to the program; and (6) hiring former service recipients to serve as peer support workers.	

FKC 1.01
A program logic model, or equivalent framework, identifies:
    a. needs the program will address;
    b. available human, financial, organizational, and community resources (i.e. inputs);
    c. program activities intended to bring about desired results;
    d. program outputs (i.e. the size and scope of services delivered);
    e. desired outcomes (i.e. the changes you expect to see in persons served); and
    f. expected long-term impact on the organization, community, and/or system.
	• CLAS Standard 9

FKC 1.02
The logic model identifies individual outcomes in at least two of the following areas:
    a. change in clinical status;
    b. change in functional status;
    c. health, welfare, and safety;
    d. permanency of life situation;
    e. quality of life;
    f. achievement of individual service goals; and
    g. other outcomes as appropriate to the program or service population.
 	
Interpretation: Outcomes data should be disaggregated to identify patterns of disparity or inequity that can be masked by aggregate data reporting. See PQI 5.02 for more information on disaggregating data to track and monitor identified outcomes.
	• CLAS Standard 9
	• CLAS Standard 10

PQI 1.02
The PQI plan:
    a. defines the organization's stakeholders; and
    b. specifies how important internal and external stakeholder groups will be involved in the PQI process.
 	
Interpretation: Stakeholder involvement is fundamental to a well-designed, useful PQI system. Ideally, a broad range of internal and external stakeholders including staff from all
	• CLAS Standard 13
	• CLAS Standard 15

COA Accreditation EDI Standards	Applicable CLAS Standards[1]

levels of the organization, the organization's governing body, persons served, and other external stakeholders have a role in the organization's PQI system.
 	
Examples: Examples of stakeholders include:
   a. staff;
   b. governing body members;
   c. persons served, including families, as appropriate;
   d. volunteers;
   e. licensing authorities;
   f. consumer advocates;
   g. funders; and
   h. contractors and partners.	

PQI 2.01
Staff responsible for implementing and coordinating the organization's PQI system are competent to:
   a. identify indicators of quality practice;
   b. implement internal and external evaluation methods, such as benchmarking, as appropriate to the programs being evaluated;
   c. ensure proper data entry and data integrity;
   d. collect, disaggregate, analyze, and interpret data; and
   e. communicate evidence and findings to staff in a manner that facilitates their active engagement.
	• CLAS Standard 9

PQI 5.01
Procedures for collecting, reviewing, and aggregating data include:
   a. cleaning data to ensure data integrity including accuracy, completeness, timeliness, uniqueness, and outliers;
   b. protecting personal identifiable information (PII) in data reports;
   c. aggregating data quarterly; and
   d. developing reports for analysis and interpretation.
 	
Interpretation: The aggregation of data reduces the risk of disclosing PII in most instances; however, risk of disclosure still exists particularly when data is being disaggregated and unique or easily observable characteristics might allow someone to be
	• CLAS Standard 10

COA Accreditation EDI Standards	Applicable CLAS Standards[1]
identified in the data set. As such, data collection and reporting procedures should include mechanisms for avoiding such disclosure such as data suppression, rounding, reporting in ranges rather than exact counts, combining sub-groups into larger groups, etc.	

PQI 5.02
The organization analyzes disaggregated PQI data to:
    a. track and monitor identified measures;
    b. identify patterns and trends; and
    c. compare performance over time.
 	
Interpretation: Organizations should disaggregate data to identify patterns of disparity or inequity that can be masked by aggregate data reporting. Common characteristics used to disaggregate data include:
    a. race and ethnicity/country of origin;
    b. generation status;
    c. immigrant/refugee status;
    d. age group;
    e. sexual orientation; and
    f. gender/gender identity.
	• CLAS Standard 10

PQI 5.03
Reports of PQI findings are:
    a. shared and discussed with board members, staff, and stakeholders; and
    b. distributed in timeframes and formats that facilitate review, analysis, interpretation, and timely corrective action.
	• CLAS Standard 15

PQI 5.04
The organization:
    a. reviews PQI findings and stakeholder feedback and takes action, when indicated; and
    b. monitors the effectiveness of actions taken and modifies implemented improvements, as needed.
	• CLAS Standard 10
	• CLAS Standard 15

CR 1.05	• CLAS Standard 14

COA Accreditation EDI Standards	Applicable CLAS Standards[1]

The organization maintains a formal mechanism through which applicants, clients, and other stakeholders can express and resolve grievances, including denial of service, which includes:
   a. the right to file a grievance without interference or retaliation;
   b. timely written notification of the resolution and an explanation of any further appeal, rights or recourse; and
   c. at least one level of review that does not involve the person about whom the complaint has been made or the person who reached the decision under review.	

CR 1.02
Written rights and responsibilities include, but are not limited to:
   a. basic expectations for use of the organization's services including the responsibility to provide information needed to receive services;
   b. hours in which services are available;
   c. rules, behavioral expectations, and other factors that could result in discharge or termination;
   d. the right of the person served to receive service in a manner that is non-coercive and that protects the person's right to self-determination;
   e. the right of the person served, families, and/or legal guardians to participate in decisions regarding the services provided; and
   f. basic information about how to lodge complaints, grievances, or appeals.
	• CLAS Standard 14

HR 3.04
The organization establishes personnel grievance procedures, which include:
   a. the right to file a grievance without interference or retaliation;
   b. a description of how grievances are filed, to whom, and who will make a final determination;
   c. timely written notification of the resolution and an explanation of any further appeal, rights, or recourse;
   d. processes for review including a third-party review of the final determination;
   e. documenting responses and actions taken; and
   f. maintaining a copy of the notification of resolution in the personnel record.
 	
Interpretation: Regarding element (d), the third-party review refers to at least one level of review that does not involve the person about whom the complaint has been made or the
	• CLAS Standard 14

COA Accreditation EDI Standards	Applicable CLAS Standards[1]
person who reached the decision under review. If a grievance is raised against the CEO, then the grievance will go directly to the governing body.	

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