**2022 Field Comment Period**

# Equity, Diversity, and Inclusion Draft Standards Updates

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## Client Rights (CR)

**CR 1 Revised Standard**

The organization protects the legal and ethical rights of persons served by:

1. informing people of their rights and responsibilities;
2. providing ethical and equitable treatment; and
3. providing people with sufficient information to make an informed choice about using the organization and its services.

**CR 1.03 Revised Fundamental Practice[[1]](#footnote-2) Standard**

People have the right to ethical and equitable treatment including:

1. the right to receive services in a non-discriminatory manner;
2. the consistent enforcement of program rules and expectations; and
3. the right to receive inclusive services that are respectful of, and responsive to, cultural and linguistic diversity.

**CR 1.04 Revised Fundamental Practice Standard and Added Interpretation**

Individuals provide consent prior to receiving services and have the right to:

1. participate in all service decisions;
2. be informed of the benefits, risks, side effects, and alternatives to planned services;
3. be offered the most appropriate, and least restrictive or intrusive service alternative to meet their needs;
4. receive service in a manner that is free from harassment or coercion and that protects the person’s right to self-determination;
5. refuse any service, treatment, or medication, unless mandated by law or court order; and
6. be informed about the consequences of such refusal, which can include discharge.

**Interpretation:** Regarding element d, organizations should ensure that services or interventions do not include strategies that are coercive, threatening, or harmful to an individual’s overall wellbeing. Research shows that services and interventions that attempt to alter sexual orientation, gender identity, or gender expression (e.g. conversion or reparative therapies) are harmful and, as such, should be prohibited from agency practice.

## Administrative and Service Environment (ASE)

**ASE 2.05 New Standard**

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, culturally diverse décor, LGBTQ symbols, or poster and stickers promoting racial justice.

## Training and Supervision (TS)

**TS 1.01 Revised Fundamental Practice[[2]](#footnote-3) Standard and Added Examples**

A personnel development plan:

1. is reviewed annually and revised in accord with an assessment of the organization's training needs;
2. incorporates a variety of educational methods;
3. is responsive to the history, cultural backgrounds, and related needs of personnel;
4. outlines specific competency expectations for each job category;
5. provides opportunities for personnel to fulfill the continuing education requirements of their respective professions;
6. provides opportunities to support advancement within the organization and profession; and
7. provides opportunities for personnel to deepen their cultural competence and practice cultural humility.

**Examples:** Educational methods can include, but are not limited to:

1. interactive classroom trainings;
2. webinars, self-paced trainings, or other computer-assisted training models;
3. coaching; and
4. structured peer support opportunities.

**Examples:** Examples of cultural competence opportunities can include:

1. lunch and learns, webinars, or lectures;
2. facilitated conversations;
3. employee resource groups; and
4. resource sharing.

**TS 1.02 Added Examples**

New personnel are oriented within the first three months of hire to the organization's mission, philosophy, goals, and services.

**Examples:** An inclusive onboarding process should reflect the organization’s commitment to equity, diversity, and inclusion.

## Human Resources (HR)

**HR 2.01 Revised Fundamental Practice[[3]](#footnote-4) Standard**

Job descriptions and selection criteria:

1. state the credentials, job expectations, core competencies, essential functions, and responsibilities for each position or group of like positions;
2. include inclusive language and demonstrate the organization’s commitment to equity, diversity, and inclusion;
3. include sensitivity to the service population’s cultural and socioeconomic characteristics; and
4. 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:

1. education;
2. training;
3. relevant experience;
4. competence in required role;
5. recommendations of peers and former employers; and
6. any available state registration, licensing, or certification for the respective disciplines.

Related Standard: GOV 2.04

**HR 2.02 Revised Standard and Added Examples**

Recruitment and selection procedures include:

1. notifying personnel of available positions;
2. verifying past employment and credentials;
3. providing applicants with a written job description;
4. giving final candidates the opportunity to speak with currently-employed personnel;
5. using standard interview questions that comply with employment and labor laws; and
6. using diverse interview panels.

**Examples:** When creating interview panels, organizations should consider age, gender, race, ethnicity, and seniority level. Diverse panels with representatives from different backgrounds and departments offer new perspectives, encourage organizations to think broadly and inclusively, and minimize bias.

**HR 3.01 Added Examples** The organization annually measures personnel satisfaction and retention and takes action to address identified satisfaction and retention concerns.

**Examples:** Disaggregated data can be useful in addressing identified satisfaction, retention, turnover, hiring, and promotion concerns.

**HR 3.02 Revised Standard and Examples**

All personnel confirm receipt of a personnel policies and procedures manual that articulates current:

1. conditions of employment;
2. benefits;
3. rights and responsibilities of employees; and
4. other important employment-related information.

**Examples:** Policies and procedures that are commonly addressed in a personnel manual include:

1. the organization’s equity statement;
2. conditions and procedures for layoffs;
3. emergency and safety procedures;
4. equal employment policies;
5. harassment and discrimination;
6. nepotism and favoritism protections;
7. grievance process procedures;
8. insurance protections including unemployment, disability, medical care, and malpractice liability;
9. performance review system;
10. promotions;
11. professional development;
12. standards of conduct;
13. time-off policies;
14. wage policy;
15. working conditions;
16. technology/network security and usage policies; and
17. the use of social media, electronic communications, and mobile devices.

Related Standard: GOV 2.04

**HR 3.03 New Standard**

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.

**HR 4.02 Revised Standard**

Staff performance reviews emphasize self-development and professional growth and include:

1. specific expectations defined in the job description;
2. organization-wide expectations for personnel;
3. 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;
4. strategies to continue developing cultural competency;
5. recommendations for training; and
6. an assessment of the staff member's knowledge and competence related to the characteristics and needs of service recipients, if applicable.

**Examples:**Organization-wide expectations for personnel can include attitudes, knowledge, and skills needed to effectively implement evidence-based practices with fidelity, when applicable.

## Risk Prevention and Management (RPM)

**RPM 6.01 Revised Standard**

The organization:

1. establishes a system of standardized contracting practices;
2. pursues contracts that serve the organization’s and service recipient’s best interests, not private interests;
3. seeks opportunities to source goods and services from diverse suppliers;
4. conducts due diligence in contracting activities including review of possible risks;
5. uses competitive bidding, when applicable; and
6. ensures governing body review of significant contracts.

## Governance (GOV)

**GOV 2.02 Revised Fundamental Practice[[4]](#footnote-5) Standard**

The governing body reviews and approves the long-term strategic plan to ensure that it encompasses:

1. a review of the organization’s mission, values, mandates, and strategic direction;
2. a review of the demographics of its defined service population;
3. an assessment of strengths and weaknesses;
4. an assessment of equity, diversity, and inclusion strategies;
5. measurable goals and objectives that support fulfillment of its mission and mandated responsibilities; and
6. 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.

**GOV 2.04 New Standard**

The organization develops an equity statement to ensure that all stakeholders understand the organization’s commitment to equity, diversity, and inclusion.

**GOV 2 Added Evidence**

|  |  |  |
| --- | --- | --- |
| Self-Study Evidence | On-Site Evidence | On-Site Activities |
| * Strategic and annual planning procedures * Long-term strategic plan * Review of service population demographics * Assessment of strengths and weaknesses * Annual plans * Equity statement | * Governing Body and/or committee meeting minutes where mission fulfillment and strategic planning were discussed | * Interviews may include:   1. CEO   2. CFO   3. Governing body   4. Senior management   5. Relevant personnel |

**GOV 4.04 New Standard**

All governing body members receive equity, diversity, and inclusion training at least every three years.

**Examples:** In order to best engage governing board members, organizations should connect EDI training to the mission of the organization and the desired outcomes of its programs.

## Financial Management (FIN)

**FIN 4.01 Added Examples to Fundamental Practice[[5]](#footnote-6) Standard**

The annual planning and budget cycle includes participation of management, the governing body, program personnel, and other relevant stakeholders and is based on:

1. the organization’s mission and strategic priorities;
2. performance improvement and outcomes data;
3. direct and indirect operating expenditures;
4. contractual requirements;
5. changing costs and conditions; and
6. anticipated revenue for the program year.

**Examples:** Performance improvement and outcomes data in this context refers to the use of program and individual 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.

Examples: In regards to element a, the review of mission and strategic priorities may include a review of identified EDI strategies to ensure sufficient funding has been allocated to meet identified goals and support implementation of the organization’s equity statement.

## Performance and Quality Improvement (PQI)

**PQI 2.01 Revised Standard**

Staff responsible for implementing and coordinating the organization's PQI system are competent to:

1. identify indicators of quality practice;
2. implement internal and external evaluation methods, such as benchmarking, as appropriate to the programs being evaluated;
3. ensure proper data entry and data integrity;
4. collect, disaggregate, analyze, and interpret data; and
5. communicate evidence and findings to staff in a manner that facilitates their active engagement.

**PQI 5.02 Revised Standard and Added Interpretation**

The organization analyzes disaggregated PQI data to:

1. track and monitor identified measures;
2. identify patterns and trends; and
3. 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:

1. race and ethnicity/country of origin;
2. generation status;
3. immigrant/refugee status;
4. age group;
5. sexual orientation; and
6. gender/gender identity.

## Adoption Services (AS)

**AS 3 Revised Standard**

The program conducts outreach, recruitment, and orientation activities in a responsive, ethical, and non-discriminatory manner.

**AS 3.06 New Standard**

Adoptive parent recruitment is ethical and equitable, and eligibility criteria:

1. prioritizes the needs and varying characteristics of children in care;
2. promotes inclusion of individuals and families with diverse backgrounds;
3. does not discriminate on the basis of marital status, race, ethnicity, gender identity, sexual orientation, income, religion, or intellectual/developmental or physical disability; and
4. emphasizes the skills and capacities needed to parent.

**AS 3.07 Deleted Standard**

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## Family Foster Care and Kinship Care (FKC)

**FKC 1.02 Revised Standard and Interpretation**

The logic model identifies individual outcomes in at least two of the following areas:

1. change in clinical status;
2. change in functional status;
3. health, welfare, and safety;
4. permanency of life situation;
5. quality of life;
6. achievement of individual service goals; and
7. other outcomes as appropriate to the program or service population.

**Interpretation:** Outcomes data should be disaggregated by race or ethnicity to identify and monitor disparities in service provision or effectiveness. See PQI 5.02 for more information on disaggregating data to track and monitor identified outcomes.

**FKC 2.04 Revised Standard**

Workers who collaborate with resource families are trained on or demonstrate competency to:

1. recruit, assess, and engage with resource parents;
2. help resource families to meet the needs of the children in their care and provide a physically and psychologically safe and nurturing environment;
3. provide timely and responsive support to resource families; and
4. facilitate relationships between birth parents and resource families, when appropriate

**FKC 7.05 Revised Standard**

The organization promotes the stability of children’s living environments and prevents the need for placement changes through coordinated placement planning that:

1. ensures children, families, and resource families understand the steps involved in the process for a child joining a new family setting and receive support and information throughout;
2. provides all legally permissible information about each child's diverse service needs and characteristics, behaviors, histories, preferences, physical and behavioral health needs, and permanency goals to prospective resource families;
3. ensures that resource families make an informed decision to accept children into their care;
4. arranges opportunities for children and parents to meet prospective resource families when possible;
5. responds proactively to challenges that arise by assessing needs and arranging necessary services, supports, or interventions to preserve the placement when in the best interests of the child;
6. permits children transitioning from treatment foster care to remain in their living environment whenever possible and appropriate; and
7. facilitates workers’ ability to spend more time with children, families, and/or resource parents after children first come into the home or when challenges arise.

**FKC 10.03 Revised Fundamental Practice[[6]](#footnote-7) Standard**

In order to ensure that their personal care needs are met, children are provided with:

1. a physical environment and materials that support healthy development;
2. sufficient and nutritious meals and snacks;
3. clothing that supports their self-expression and is clean, seasonal, age-appropriate, and comfortable;
4. an allowance for personal needs, as appropriate;
5. assistance in meeting personal care needs, as appropriate; and
6. regular access to a telephone to contact workers, advocates, service providers, and approved family and friends.

**FKC 17.04 New Standard**

Resource parent recruitment is ethical and equitable, and eligibility criteria:

1. prioritizes the needs and varying characteristics of children in care;
2. promotes inclusion of individuals and families with diverse backgrounds;
3. does not discriminate on the basis of marital status, race, ethnicity, gender identity, sexual orientation, income, religious practices, and intellectual/developmental or physical disability; and
4. emphasizes the skills and capacities needed to parent.

## Housing Stabilization and Community Living Services (HSCL)

**HSCL 5.02 Revised Standard and Interpretation and Added Examples**

The organization considers the unique characteristics, needs, and preferences of individuals when grouping people together.

**Interpretation:** Characteristics and needs that should be considered can include the number of individuals grouped together, age, special needs, gender, gender identity, and gender expression. Transgender and gender non-conforming people should be given access to sleeping quarters, bathroom facilities, and services based on their preferences and in accordance with applicable federal and state laws.

**Examples:** Examples of ways that organizations can meet the grouping needs of transgender and gender non-conforming people can include, but are not limited to:

1. respecting the individual’s preferred pronouns;
2. providing gender neutral restrooms where facility structure allows;
3. having residents use restrooms one at a time;
4. allowing for single bedroom models; or
5. providing LGBTQ specific units.

**NA** The organization only provides homelessness prevention and rapid re-housing services and does not offer housing services directly to persons served.

## Respite Care (RC)

**RC 6.02 Revised Fundamental Practice[[7]](#footnote-8) Standard**

Respite care providers:

1. are familiar with the care recipient’s daily routine, preferred foods and activities, and needed therapeutic or medical care;
2. respect the culture, race, ethnicity, language, religion, gender identity, and sexual orientation of the care recipient; and
3. offer activities with content appropriate to the interests, age, development, physical abilities, interpersonal characteristics, and special needs of the care recipient.

## Group Living Services (GLS)

**GLS 3.01 Revised Standard and Interpretation and Added Examples**

The organization defines in writing:

1. eligibility criteria, including age, developmental stage, and populations served;
2. scope of services, special areas of expertise, and the range of resident issues addressed; and
3. how the facility promotes living-unit compatibility based on the characteristics, diverse service needs, and preferences of individuals.

**Interpretation:** In regards to element (c), COA Accreditation recognizes that organizations, particularly those that receive residents through referrals only, may have limited control of group composition. In these instances, the organization should identify the population(s) served; state how residents’ diverse service needs, preferences, and characteristics will be considered ; and include strategies for promoting living-unit compatibility when possible.

Characteristics and needs that should be considered can include age, special needs, ability to adjust to a group, gender, gender identity, and gender expression. Transgender and gender non-conforming individuals should be given access to sleeping quarters, bathroom facilities, and services based on their preferences and in accordance with applicable federal and state laws.

**Examples**: Examples of ways that organizations can meet the grouping needs of transgender and gender non-conforming people can include, but are not limited to:

1. respecting the individual’s preferred pronouns;
2. providing gender neutral restrooms where facility structure allows;
3. having residents use restrooms one at a time:
4. allowing for single bedroom models; or
5. providing LGBTQ specific units.

## Residential Treatment (RTX)

**RTX 3.01 Revised Standard and Interpretation and Added Examples**

The organization defines in writing:

1. eligibility criteria, including age, developmental stage, and populations served;
2. scope of services and supports, special areas of expertise, and range of service needs addressed; and

**RTX 16.03 New Standard**

The organization promotes living unit compatibility by considering residents’ unique characteristics, needs, and preferences when grouping people together.

**Interpretation:** Characteristics and needs that should be considered include age, developmental level, service needs, ability to adjust to a group, gender, gender identity, and gender expression. Transgender and gender-nonconforming individuals should be given access to sleeping quarters and bathroom facilities based on their preferences and in accordance with applicable federal and state laws.

**Examples:** Examples of ways that organizations can meet the grouping needs of transgender and gender non-conforming people can include, but are not limited to: respecting the individual’s preferred pronouns; providing gender neutral restrooms where facility structure allows; having residents use restrooms one at a time; allowing for single bedroom models; and providing LGBTQ specific units.

## Shelter Services (SH)

**SH 7.03 Revised Standard and Interpretation and Added Examples**

The organization considers the unique characteristics, needs, and preferences of shelter residents when grouping people together.

**Interpretation:** Characteristics and needs that should be considered can include age, special needs, ability to adjust to a group, gender, gender identity, and gender expression.  Transgender and gender non-conforming individuals should be given access to sleeping quarters, bathroom facilities, and services based on their preferences and in accordance with applicable federal and state laws.

**Examples:** Examples of ways that organizations can meet the grouping needs of transgender and gender non-conforming individuals can include but are not limited to:

1. respecting the individual’s preferred pronouns;
2. providing gender neutral restrooms where facility structure allows;
3. having residents use restrooms one at a time;
4. allowing for single bedroom models; or
5. providing LGBTQ specific units.

## Unaccompanied Children Services (UC)

**UC 3.01 Revised Standard and Interpretation and Added Examples**

The program defines in writing and communicates in a language accessible to the child:

1. eligibility criteria including age, developmental stage, and special care needs;
2. scope of services, special areas of expertise, and the range of conditions addressed;
3. opportunities for family reunification and sponsorship efforts including collaboration with other ORR pre-approved providers and entities;
4. rules, expectations, and rights aligned with ORR policy; and
5. how the facility promotes living-unit compatibility based on the characteristics, diverse service needs, and preferences of individuals.

**Interpretation:** In regards to element (e), COA Accreditation recognizes that organizations, particularly those that are connected with persons served through referrals only, may have limited control of group composition. In these instances, the organization should identify the population(s) served; state how diverse service needs, preferences, and characteristics will be considered, and include strategies for promoting living-unit compatibility when possible.

Characteristics and needs that should be considered can include age, special needs, ability to adjust to a group, gender, gender identity, and gender expression. Transgender and gender non-conforming individuals should be given access to sleeping quarters, bathroom facilities, and services based on their preferences and in accordance with applicable federal and state laws.

**Examples:** Examples of ways that organizations can demonstrate consideration for diverse needs and promote living-unit compatibility can include but are not limited to:

1. respecting the individual’s preferred pronouns;
2. providing gender neutral restrooms where facility structure allows;
3. having residents use restrooms one at a time:
4. allowing for single bedroom models; or
5. providing LGBTQ specific units.

1. This standard is a Fundamental Practice standard. This is a category of standard focused on client rights, health and safety, or organizational effectiveness. In order to achieve accreditation, on organization must receive a "1" or a "2" rating on all Fundamental Practice standards. [↑](#footnote-ref-2)
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