Adherence to National Culturally Linguistic Appropriate Services

Policy Number:          RWC- 105
Program:               Residential Program, Withdrawal Management Program, Outpatient Program
Creation Date:         August 30, 2018
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I. Introduction and Purpose

Interfaith Community Services (Interfaith) Recovery and Wellness Center (RWC) Substance Use Disorder (SUD) Programs provide services that adhere to the National Culturally Linguistic Appropriate Services (CLAS) Standards, to improve the quality of services provided to all individuals, which will ultimately help reduce health disparities and achieve health equity. The National CLAS Standards aim to improve health care quality and advance health equity by establishing a framework to serve the nation's increasingly diverse communities.

II. Policy

Interfaith Community Services has adopted the Federal Office of Minority Health (OMH) Nationally Culturally and Linguistically Appropriate Services (CLAS Standards). It is the policy of Interfaith Community Services’ employees, interns and volunteers (providers) to continuously adhere to CLAS Standards to ensure equal access to quality Participant care by diverse populations and 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. Adhering to CLAS standards ensures Interfaith’s RWC respect the whole individual and respond to the individual’s health needs and preferences.

III. Procedures

The National CLAS Standards are a set of fifteen (15) action steps intended to advance health equity, improve quality and help eliminate health care disparities as follows:

Principal Standard

1. 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.

Governance, Leadership and Workforce
1. Advance and sustain organizational governance and leadership that promotes CLAS and health equity through policy, practices, and allocated resources.
2. Recruit, promote, and support a culturally and linguistically diverse governance, leadership, and workforce that are responsive to the population in the service area.
3. Educate and train governance, leadership, and workforce in culturally and linguistically appropriate policies and practices on an ongoing basis.

Communication and Language Assistance

5. 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.
6. Inform all individuals of the availability of language assistance services clearly and in their preferred language, verbally and in writing.
7. Ensure the competence of individuals providing language assistance, recognizing that the use of untrained individuals and/or minors as interpreters should be avoided.
8. Provide easy-to-understand print and multimedia materials and signage in the languages commonly used by the populations in the service area.

Engagement, Continuous Improvement, and Accountability

9. Establish culturally and linguistically appropriate goals, policies, and management accountability, and infuse them throughout the organization's planning and operations.
10. Conduct ongoing assessments of the organization's CLAS-related activities and integrate CLAS-related measures into measurement and continuous quality improvement activities.
11. Collect and maintain accurate and reliable demographic data to monitor and evaluate the impact of CLAS on health equity and outcomes and to inform service delivery.
12. Conduct regular assessments of community health assets and needs and use the results to plan and implement services that respond to the cultural and linguistic diversity of populations in the service area.
13. Partner with the community to design, implement, and evaluate policies, practices, and services to ensure cultural and linguistic appropriateness.
14. Create conflict and grievance resolution processes that are culturally and linguistically appropriate to identify, prevent, and resolve conflicts or complaints.
15. Communicate the organization's progress in implementing and sustaining CLAS to all stakeholders, constituents, and the general public.

Participants with limited English proficiency will be informed in a language they understand that they have a right to free interpreter services. The offer of interpreter and the participant's response shall be documented in their chart, as well the use of an interpreter and documentation when services are provided in a language other than English.

In addition, Interfaith Community Services' RWC Programs will ensure that facilities have posters regarding limited English proficiency, participants receive services and informational materials in their preferred language, and Beneficiary handbooks are available upon request and offered during the intake process. The posters at the sites and materials provided and offered are available in the threshold languages identified by the San Diego County system of care: English, Tagalog, Spanish, Arabic, Farsi, and
Vietnamese. Self-addressed stamped envelopes, brochures, and grievance/appeal forms are also available in the threshold languages.

IV. References

A. Substance Use Disorder Provider Operations Handbook
B. National CLAS Standards

V. Approval

This policy has been reviewed and approved by the Interfaith Community Services Chief Program Officer and Recovery and Wellness Center Director. The policy is effective as of the most current date of signature below.

Filipa Rios, Chief Program Officer  2/4/21  Erin Murphy, Recovery and Wellness Center Director  2/5/21
What is Cultural Competency?

An awareness of, respect for, and attention to the diversity of the people with whom it interacts (persons served, personnel, and other stakeholders) that are reflected in attitudes, organizational structures, policies, and services.

Overview

Interfaith Community Services (Interfaith) strives to deliver culturally, ethnically and linguistically appropriate services to individuals and families. The purpose of this plan is to identify the strategic priorities of Interfaith and describe how the Interfaith team will deliver culturally competent and sensitive services to the community and eliminate access barriers. This plan also includes goals for the next two years to ensure continuous assessment and improvement of the Agency’s services.

The creation and implementation of our Cultural Competency and Diversity Plan is an essential foundation to ensure that our staff, persons served, and other stakeholders develop awareness and sensitivity specific to the diversity of our service delivery areas. Diversity in terms of culture, age, gender, sexual orientation, spiritual beliefs, socioeconomic status, and language are addressed in this plan.

The framework for our Cultural Competency and Diversity Plan is based on CARF’s ASPIRE to Excellence® model and uses the CARF standards as a guide to ensure an ongoing process of continuous quality improvement.

A -- Assess the Environment
S -- Set Strategy
P -- Persons Served and Other Stakeholders - Obtain Input
I -- Implement the Plan
R -- Review Results
E -- Effect Change

Although Interfaith Community Services is not suggesting that our leadership and personnel need to know everything about all cultures, we feel it is imperative that our leadership and staff members develop a basic understanding of the major values and beliefs of the people we serve and other stakeholders, especially those who may come from different cultural or spiritual backgrounds. To this end, enhanced education and training – specifically in the areas of culture, age, gender, sexual orientation, spiritual beliefs, socioeconomic status, and language – will be provided to all employees and board members to assist in developing a greater awareness and sensitivity specific to the diversity of our service delivery areas. Training will also focus on the cultural and spiritual beliefs of the countries of origin, especially their views of disabilities and its causes, and the influence of culture on the choice of service outcomes and methods. Attendance at cultural competency and diversity training will be documented and included in personnel files and/or training records.

Interfaith believe that effective programming treats each individual in a holistic manner by creating culturally competent programs to maintain a set of attitudes, perspectives, behaviors, and policies – both individually and organizationally – that promote positive and effective interactions with diverse cultures. Practicing cultural competence to honor diversity means understanding the core needs of our target audience and designing services and materials to meet those needs strategically. It is important to
regularly and honestly evaluate organizational and operational practices to ensure all voices are heard and reflected.

**Interfaith Community Services’ Strategic Priorities**

**Mission Statement:** Interfaith Community Services empowers people in need to stabilize and improve their lives through comprehensive programs, in partnership with diverse faith communities and people of compassion.

Understanding that our mission calls for Interfaith Community Services to empower all who turn to us in their time of crisis, and that the breadth of our programs position us to address the complex social needs underlying poverty and homelessness, Interfaith engaged the broader community in 2014 to identify our strengths, the most pressing community needs, and how we should prioritize our work. This effort was inclusive of the diverse communities being served, with consumers of Interfaith’s services, partner agencies, government agencies, faith centers, and the general local population all working to ensure Interfaith’s priorities reflect the needs of all residents, especially those who are traditionally under-represented in the delivery, design, and quality of care.

The community-selected strategic priorities for Interfaith are:

1) Fulfill Basic Needs for All People
2) Create and Sustain Value-Based Partnerships
3) Strengthen Service-Enriched Housing for Persons in Crisis
4) Promote Self-Sufficiency and Empowered Living
5) Expand Recovery and Addiction Services

Interfaith’s mission and programs specialize in helping all people who are ready and willing to help themselves. We empower low-income adults, families, youth, veterans, and seniors. We focus our work primarily in North San Diego County, where our 355 member faith communities are located.

The work of Interfaith Community Services brings together an audacious network of dedicated, practical people focused in partnership to improve the lives of our most marginalized neighbors. Inclusive and collaborative feedback and participation is encouraged, to ensure effective, appropriate, equitable, and quality services are provided for the diverse North County residents we serve.

**Valuing Cultural Competence**

1. Interfaith’s mission of empowering people to stabilize and improve their lives encompasses people from different cultural backgrounds. Interfaith’s diverse faith community, volunteers, and employees value the importance of cultural competence and incorporate culturally competent services into the daily practice of service delivery. Policies and procedures are developed with the understanding that no two clients are alike and Interfaith must be able to respond to the unique needs of people from diverse cultural, linguistic backgrounds.

2. Interfaith Community Services believes in involving people of diverse faith and enjoys the support of more than 350 faith centers in San Diego County, truly representing the broader faith community it serves.

3. Interfaith believes culture is a key factor when working with complex and disenfranchised populations. Cultural norms, values, beliefs, customs, and behaviors influence the manifestation
of trauma and chronic conditions, the utilization of services, the course of treatment, and the prognosis of our clients. Interfaith’s staff and volunteers vary in terms of age, race, ethnicity, gender, sexual orientation, and religion, including consumers, family members and individuals with a wide variety of life experience.

4. Interfaith understands the principals of Trauma Informed Care and has integrated trauma informed services agency-wide. Throughout Interfaith, staff and the people they serve feel physically and psychologically safe. Organizational operations and decisions are conducted with transparency and the goal of building and maintaining trust among staff, clients, and family members of those receiving services. Peer support and mutual self-help is integral to Interfaith and service delivery model, and a key vehicle for building trust, establishing safety, and empowerment. At Interfaith, collaboration and mutuality is valued. There is true partnering and leveling of power differences between staff and clients and recognition that healing happens in relationships and in the meaningful sharing of power and decision-making. Interfaith recognizes that everyone has a role to play in a trauma-informed approach. Throughout Interfaith and among the clients served, individuals' strengths are recognized, built on, and validated and new skills developed as necessary. Interfaith aims to strengthen the staff's, clients', and family members' experience of choice and recognize that every person's experience is unique and requires an individualized approach. This includes a belief in resilience and in the ability of individuals, organizations, and communities to heal and promote recovery from trauma, building on what clients, staff, and communities have to offer, rather than responding to perceived deficits. Interfaith actively moves past cultural stereotypes and biases (e.g., based on race, ethnicity, sexual orientation, age, geography), offers gender responsive services, leverages the healing value of traditional cultural connections, and recognizes and addresses historical trauma. Interfaith's Clinical Director provides clinical oversight of all clinical staff, strengthening and integrating best practices across Interfaith's program portfolio. All program staff are trained in delivering trauma informed services in order to ensure that no clients are re-traumatized through the delivery of services. Interfaith has a history of integrating trauma informed services in all areas of service delivery.

5. Interfaith believes in establishing an awareness that there are cultural differences in the way people react to the experience trauma, building on the five main areas of positive development,
   a. Appreciation of life.
   b. Relationships with others.
   c. New possibilities in life.
   d. Personal strength.
   e. Spiritual change.
Interfaith seeks to help our clients build resilience through our work, expanding on the trauma informed services to incorporate the benefits of post traumatic growth.

6. Interfaith Community Services offers a wide array of programs including housing and shelter, employment, food, basic needs, behavioral health, and resource referral. North San Diego County is home to a diverse population and Interfaith serves a wide variety of individuals and families. Interfaith strives to stay on the forefront of providing trauma-informed services through the provision of staff training, surveys, and policy and procedure development that incorporates best practices for culturally sensitive service delivery. In addition, services are linguistically and
culturally appropriate and sensitive to the historical, cultural, racial, and faith experiences of diverse populations.

7. Interfaith Community Services is an Equal Employment Opportunity Affirmative Action employer, committed to the elimination of barriers that restrict the employment opportunities available to women, minorities, the disabled, and individuals’ representative of the geographic regions served by the agency. Recognizing that equal employment opportunity requires affirmative steps to ensure the full utilization of people of all backgrounds who possess the best available skills, Interfaith has a stated goal to aggressively seek staff from all segments of the community for all job levels within the agency to reflect, as nearly as possible, the racial and ethnic composition and regional representation of its service area.

8. It is the expectation that all programmatic policies and procedures contain a section on cultural competency and how that program will successfully meet the needs of individuals while being culturally competent.

9. Interfaith will not discriminate on the following bases: against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, against any beneficiary of, applicant to, or participant in any program.

Interfaith works to incorporate strategies to improve its cultural competence through all aspects of the organization. To accomplish this, disparities for cultural, racial, and ethnic populations are identified so strategies for elimination can be developed and implemented. Cultural Competence planning, implementation, monitoring, and evaluation incorporate inputs obtained from clients, community members and staff. Interfaith recognizes that the pathways to participation in these areas will be different for different groups as determined by language, cultural practice, and other items that create disparities and so, must be incorporated into efforts to address cultural competence issues. In addition, Interfaith strives to provide accessible services, geographically convenient for diverse populations.

Employment and Employee Training

1. Interfaith actively recruits qualified applicants, especially in terms of age, race, ethnicity, language, gender, sexual orientation, and religion, and geographic areas of the individuals served, for all job postings. All job vacancies will state the position and qualifications and are disseminated through nonprofit employment forums. When regular channels of recruitment are not supplying enough individuals to fairly represent the geographic areas and individuals being served, then alternative initiatives must be instituted to better identify, educate and encourage application of candidates of merit, including, but not limited to:
   - Contact with professional minority group employment and placement agencies;
   - Recruitment through advertisement in minority group-oriented media such as El Latino Newspaper and San Diego’s The Voice and Viewpoint;
   - Identification and contact with university placement officers that have special programs for minorities; and
   - Contact with groups specifically oriented to, and concerned with, minority groups and individuals ‘representative of the geographic service areas.
2. The agency will endeavor to hire employees to reflect the cultural, ethnic, and linguistic diversity of the populations and regions served in order to provide quality culturally and linguistically appropriate services that are accessible and client-centered.

3. The U. S. Equal Employment Opportunity Commission, the U. S. Civil Service Commission, and the Department of Labor and the Department of Justice have issued uniform guidelines on employee selection procedures. These guidelines address all phases of the selection process:

   - Any testing or screening procedures will be reviewed on a continuing basis (within resources available) to ensure their job relatedness and validity. Information acquired from the position audits will be used to construct valid job-related tests and screening procedures.

   - All employment interview questions will be reviewed for job relatedness. Non-job-related questions and those items which may tend to screen out an ethnic or racial group will be eliminated. All interview questions must be approved prior to the interview.

   - Written interview results will be maintained for each posting. This information is used to assess the presence of artificial barriers to equal employment opportunities.

4. Hiring: Resumes will be requested from each applicant. An objective criteria and minimum qualifications will be pre-established for each vacancy. The resumes will be screened according to the pre-established criteria without regard to race, ethnicity, age, gender, color, religion, national origin, sexual orientation, veteran’s status, or handicap. Interviews and employment applications will be offered to qualified applicants. The immediate supervisor and/or the Director will conduct the job interviews. After consultation with a member the Executive team and/or the Director of Human Resources, the most qualified applicant will be offered the position. When the finalists are equal in qualification but one represents a minority group or are representative of the geographic service area and/or those served, they will be offered the job.

5. Promotions: Every consideration will be given to internal promotion when seeking to fill vacancies. Training programs will be provided to increase promotional opportunities for employees. On-the-job training and cross-training will be provided to expose employees to a broad range of job duties and experiences. A review of present staff will be made in search of a pool of qualified staff. Job openings and requirements will be posted and application encouraged. Promotions will be made without regard to without regard to race, ethnicity, age, gender, color, religion, national origin, sexual orientation, veteran’s status, or handicap. Each unsuccessful internal applicant will be provided with a critique and recommendations of ways to better qualify in the future.

6. Transfers will be made without regard to without regard to race, ethnicity, age, gender, color, religion, national origin, sexual orientation, socioeconomic status, veteran’s status, or handicap.

7. Demotions will be made without regard to without regard to race, ethnicity, age, gender, color, religion, national origin, sexual orientation, veteran’s status, socioeconomic status, or handicap. They may occur if the employee has demonstrated poor work performance in a position for which they are not qualified for any reason. Demotions will be made only in cases where an employee was placed into a position of responsibility above their ability to perform. Demotions will not be used for disciplinary reasons.

8. Training requirements for staff are listed in the agency’s employee manual. Elective training registration costs may be considered on an individual basis and related to the job position and responsibilities of the employee. Training will not be influenced by race, ethnicity, age, gender,
color, religion, national origin, sexual orientation, veteran’s status, socioeconomic status, or handicap. All employees are required to attend cultural competence training at least annually as part of Interfaith’s employee training model.

9. Additionally, direct client service staff is encouraged to attend any other training that may assist them delivering trauma informed and culturally competent services. Guidance on providing culturally appropriate services to the target population will be provided by Interfaith’s Clinical Director, an LMFT clinician with education and experience serving diverse populations. Staff will be trained to be sensitive to and aware of how cultural/religious influences may impact client preferences and service delivery, and to provide services that are respectful of these preferences. This may include preferences for medical care, types of psychiatric care, linkages to faith groups for community supports, among others. Staff members will focus on the following principles while helping households stabilize: client safety, building trusting relationships, facilitating peer support, synergizing collaborative relationships between clients and the case manager, building client empowerment, voice, and choice, and understanding and respect of cultural boundaries. As a program committed to client-focused care, cultural, linguistic, and religious preferences will be respected throughout service plan development and program service delivery.

10. As Interfaith’s programs have grown and evolved, the organization works to continuously provide inclusive services reflective of the communities served, acknowledging the diverse characteristics and cultural and linguistic barriers of clients.

11. In 2020, Interfaith staff started a Racial Justice Working Group. The mission of the RJWG is to develop policies, programs, and practices that effectively and efficiently bring about racial equity and justice for Interfaith staff, clients, and the communities we serve—while simultaneously empowering all.

12. In 2020 Interfaith brought on Diversity, Equity, and Inclusion consultants to support the organization’s commitment of being an anti-racist organization. All staff participated in Anti-Racism Training in 2020 and 2021.

13. In 2021, Interfaith signed a Memorandum of Understanding with the North County LGBTQ Resource Center as evidence that each agency has worked and intends to continue to work together toward the mutual goal of providing maximum available assistance to the LGBTQ population who are unhoused and in need of emotional and wrap around support in the region of North San Diego County.

**Linguistically Sensitive Services**

**Limited English Proficiency Policy**

Per Federal Guidelines, Interfaith Community Services maintains a Limited English Proficiency (LEP) Plan to ensure that Clients or potential Clients with Limited English Proficiency have equal access to services. The Chief Program Officer and the Director of Compliance and Quality Assurance are responsible for ensuring that Interfaith Community Services complies with the terms of this Policy.

**Oral Language Communication**

Interfaith Community Services provides translation or interpretation for Clients or potential Clients with Limited English Proficiency. Interfaith Community Services preferred method is to provide this service through Case Managers and Support Staff who are fluent in the threshold languages (Spanish, Tagalog,
and Vietnamese) spoken by Interfaith Clients and potential Clients. When Staff is not fluent in a Client or potential Client’s language, Interfaith will either utilize an On-Staff Interpreter (if available) or will utilize the services of a Third-Party Interpreter Service, such as License to Freedom, a San Diego County Non-Profit that offers translation services in a variety of languages. Interfaith will provide no-cost interpretation services and 24-hour language assistance services in order to maintain effective communications at any point that a language barrier is identified.

**Written Materials**

All written materials produced and provided to clients by Interfaith Community Services shall be written at no higher than sixth grade reading level so they may be easily understood by persons being served. All font shall be at least size 12. When producing client materials, staff shall consider the length and complexity to ensure concise and effective communication.

**Translation of Written Materials**

Interfaith Community Services will provide translation in Spanish of its commonly used Client documents and sight translation (as practical) of less frequently-used documents. Interfaith will inform Clients of their rights to an interpreter both at engagement and through posters, brochures, and materials at administrative sites and in the field all San Diego County threshold languages. If there is no Interfaith Staff Member fluent in a Client’s language, Interfaith will utilize the services of a Third-Party Interpreter Service, such as License to Freedom. Interfaith will provide no-cost interpretation services and 24-hour language assistance services in order to maintain effective communications at any point that a language barrier is identified.

**Intake Procedure for Non-English Speaking Clients**

If a Caller or walk-in potential Client indicates that he or she speaks a language in which no Staff Member is fluent, an Interfaith Staff Member will contact a Third-Party Interpreter Service and schedule a time (as soon as conveniently possible) to conduct a conference call with the Applicant and Third-Party Service. Interfaith will provide no-cost interpretation services and 24-hour language assistance services in order to maintain effective communications at any point that a language barrier is identified.

**Bi-Lingual Staff**

Interfaith Community Services considers Spanish-Language Proficiency as a preferred quality when hiring new Direct Services Staff. This will be clearly indicated in employee recruiting materials.

**Data Analysis**

It is the goal of Interfaith to have a diverse workforce that is representative of community that Interfaith serves. The two tables below include the demographics of both clients served and the employees of Interfaith Community Services.
Assessment for Services

Interfaith Community Services incorporates the use of trauma-informed care and the use of the biopsychosocial assessment into the case management workflow when appropriate. Case managers will concentrate on the client’s/family history within the following areas: Strengths Identification – social/family supports, internal/external resources, spiritual/religion, education and vocational skills; b)
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Functional status – cognitive, emotional, physical, and mental; c) Barrier Identification – psychosocial, financial, environmental, vocational; physical, mental; d) Community Integration potential; e) Vocational/Employment Status and potential. This will ensure that the case manager comprehensively understands the needs and dynamic of each family and allows them to have a more culturally competent understanding of the client’s need for services.

Objectives and Goals for Improvement

2021/22 Goals

1. Research and gather most recent information and feedback/ideas regarding enhancing cultural competency and diversity training, as this information relates specifically to Interfaith’s persons served, stakeholders, staff and service area.
2. Work closely with Interfaith’s Racial Justice Working Group to improve policies and procedures so that the agency may ensure all practices are culturally competent.
3. Continue working with Diversity and Inclusion consultants in an effort to enhance Interfaith’s ability to serve clients and hire/train staff in an informed and responsive way.
4. Provide LGBTQI Competency Training for all the Interfaith staff that interact with the public via phone, computer and/or in person.
5. Work with North County LGBTQ Resource Center to address and enhance protocols to support clients that are Transgender and/or non-binary according to CA law.
6. Develop a plan to identify/assess current client assessment tools and determine level of appropriateness for quality service delivery and inclusiveness of cultural competency.
7. Create a satisfaction survey for all customers to determine their level of satisfaction with their service/program experience at Interfaith.

Commitment to Continuous Quality Improvement

Interfaith is committed to utilizing the information gathered from the outcomes of our 2021-2022 Cultural Competency and Diversity Plan for the purpose of organizational responsiveness to the changing needs and expectations of the people we serve and our stakeholders, in conjunction with the changing business needs of our organization. The analysis of these outcomes will also be used by our organization to improve the quality of our programs and services and to facilitate organizational decision making and ongoing strategic planning.

2021 Statement on Anti-Racism

For over 40 years, Interfaith Community Services has provided services and advocated for vulnerable and underserved members of San Diego County regardless of their race, ethnicity, gender, religion, or sexual orientation. Following the murder of George Floyd, Interfaith pledged to actively address the inexorable link between racism, poverty, homelessness, and trauma. An employee-led Racial Justice Working Group was, then, created to facilitate our on-going commitment to Anti-Racism and identify actions leading to systematic change. We also launched a multi-city faith leaders’ coalition, which guided the development of training curricula designed to assist faith communities in understanding and responding to racism.
In 2021, Interfaith partnered with *Success Beyond Measure, Incorporated*, a diversity consulting firm, and committed to a lengthy process of self-assessment, education, and empowerment that included executive coaching, advising, organization-wide training, policy review, and organizational development. All staff teams participated in Anti-Racism Training focused on its history, definition, scope, associated language, and application. Participants also shared their personal experiences with racism and discrimination, which fostered a deeper understanding of our organizational Anti-Racism commitments. Additionally, all staff were invited to participate in structured listening sessions. While maintaining participant anonymity, information from these sessions informed guidelines for Interfaith’s Anti-Racism Roadmap, centering equity, transparency, accountability, and sustainability in our daily operations, policies, procedures, and service delivery.

Our pledge to combat systemic racism and all forms of oppression and marginalization is central to our mission. As a leader and community partner, we will work diligently to bring to fruition our vision of a society in which all people can lead healthy, self-sufficient lives.