

Centre for Social Work Research & Development

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Exploring and Expanding Community Cultural
Competency Needs and Possibilities

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Exploring and Expanding Community Cultural Competency Needs and Possibilities

Executive Summary

Background and Rationale

Canadian citizens are of diverse origins of birth, languages, ethnic affiliations and religious beliefs. Currently, one in four Calgarians is a visible minority. A visible minority label in Canada is often accompanied by poor health, workplace discrimination, racial profiling, employment with low pay, and barriers to social and human services. There is a prior probability that an immigrant to Canada (including Calgary) will face barriers to service and accessibility.

Organizational culturally competent programs, operating in parallel with the Canadian legal framework, are expected to address all the above issues. However, in Calgary, recent major cultural competency initiatives such as, Calgary Diversity Institute, Diversity Calgary, Diversity Learning Institute lasted for a short time period, three to four years from 1997 to 2005. Scholars continue to debate the need for the very existence of the Canadian multiculturalism policy of 1988. Opponents of the policy claim that, "multiculturalism 'works' to the extent that it is a superficial veneer without much real meaning. The reality is that Canada assimilates immigrants—and that's a good thing."

A key informant observed that the current level of Calgary's organizational cultural competency capacity is back "to where we were in 1985."

In light of the above, the Calgary Catholic Immigration Society (CCIS) received funding from The Calgary Foundation (TCF) to map existing services and programs in Calgary that support cultural competency in organizational and community development. The project was further subcontracted to the Centre for Social Work Research and Professional Development, Faculty of Social Work at the University of Calgary.

Methodology

From January to April, 2008 the researcher conducted a face-to-face semi-structured interview (30 minutes) with 16 key informants representing 11 Calgary organizations (5=non-profit, 3=public sector, 2=private sector, and 1=post-secondary institution). The aim of the study was to map existing services and programs in Calgary that support cultural competency in organizational and community development.¹ The project should be viewed as a feasibility study. But, “Is it even feasible to collect accurate and reliable information regarding organizational cultural competency?” The interview schedule consisted of both open- and closed-ended questions (categorical and scalar questions – five-point agreement scale ranging from “strongly agree” to “strongly disagree”). The quantitative data were analyzed using the Statistical Package for the Social Sciences (SPSS 16.0 for Windows). The qualitative data were analyzed through content analysis.

The following questions guided the study:

1. In the past five years what community organizations have delivered cultural competency services or have otherwise expressed/portrayed culture competency? What is the nature of the services? Who are the target(s) of these services?
2. What is the broad community need/rationale for such services?
3. How can the Calgary community be engaged in cultural competency development?
4. What are the gaps in services and support?
5. Can one identify best practices in the area of cultural competency? If so, are they widely accepted and well-known?
6. How can community resources be coordinated?

The study protocol was approved in December, 2007 by the Conjoint Faculties Research Ethics Board (CFREB) of the University of Calgary.

¹ Although 16 key informants participated in the study only 15 interviews were conducted, however, because two key informants from CCIS participated in the same face-to-face interview.

Key Findings

- The majority (8 of 11) of participating organizations had conducted organizational self-assessment or cultural audits within the past five years: a) hired external consultants, b) kept current with cultural competency literature, c) conducted an organizational strategic plan, d) reviewed organizational material, e) encouraged input from staff, f) made efforts to hire diverse staff, board members and volunteers, and g) used established guidelines.
- Fewer organizations (3 to 5 of 11) reported that they regularly: a) allocated resources to implement culturally relevant policies, b) utilized the expertise of culturally diverse groups to set culturally sensitive hiring policies and culturally relevant services, c) evaluated impacts of the programs/projects on culturally diverse clients, and d) ensured that the board members represented relevant culturally diverse groups.
- The majority (8 of 11) of participating organizations employed both external and internal consultants to train the staff, the board, and volunteer members.
 - External consultants covered topics including, communication in a diverse environment, leadership in a pluralistic society, community plan for diversifying Calgary's leaders, power analysis etc.
 - Internal consultants covered topics including, definition of cultural competency, a review of policies and procedures (where improvement needed), awareness raising, bias replacing, and racism in Canada etc.
- Participating organizations also modeled (ensured that the diversity of staff, board and volunteers mirrored the diversity of Calgary) themselves, beyond the parameters of training, as culturally competent mentoring organizations.
- Several gaps (i.e., unmet needs) limit the progress toward organizational and community cultural competency in Calgary:
 - Simplified and user-friendly tool-kits or instruments need to be developed to motivate organizations to undertake a self-assessment exercise

- An accessible and searchable database of names and topics covered by external consultants needs to be developed
- There needs to be agreed upon and standardized training materials to guard against misleading information and/or latent/blatant stereotyping. A key informant articulated “without knowing ...a universally recognized expertise. It’s a little bit of here, little bit of there. It’s very hard to have the confidence to say if you’re doing well in this, you will be able to do well on that.”
- Other identified needs are:
 - Calgary needs a central location for organizational cultural competency
 - Cultural competency framework needs to be a combination of community experience and an academic framework
 - Organizations need to accept and understand that cultural competency initiatives are not only for minorities
 - Researchers and practitioners need to explore power relations and privilege and encourage inclusion
 - Cultural competency training needs to transform cultural competency education (effect a change in attitudes)
 - Organizations need to find internal leaders
 - Researchers and practitioners need to use a resiliency, or needs and assets model, rather than a typical deficit model to explore and expand cultural competency possibilities

Generally, the participating organizations, (reporting through key informants), showed a great deal of understanding and a desire to move their agenda from the “cultural pre-competence” stage to the “cultural competence” stage as established by the Cross (2008) continuum.

Exploring and Expanding Community Cultural Competency Needs and Possibilities

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Exploring and Expanding Community Cultural Competency Needs and Possibilities

1.0 Introduction and Context

1.1 Canadian Immigration Pattern

"Canadians are diverse in terms of their places of birth, languages, ethnic affiliations and religious beliefs" (Van Ngo, 2008, p. 5). Canada has opened its doors to approximately 138 countries (Van Ngo, 2000). Groups of people who have migrated to Canada are referred to by various descriptors including immigrants, ethno-cultural groups, and/or ethnic minorities.² The immigrants are perceived as visible minorities and non-visible minorities.³ In two recent studies Van Ngo (2000, 2008) points out disparity of experiences among Canadians, a) between ethnic majority and ethnic minority groups, b) between visible minorities and non-visible minorities, and c) between visible minorities and the "white" population in Canada. In his 2008 study Van Ngo reports the following quick facts assembled through a variety of sources:⁴

- About 20% of Canadians were born outside of Canada, but about 14% of Canadians are of a visible minority.
- The visible minority population in Canada has tripled since 1981 and Statistics Canada (2005, cited in Este, 2007) predicts that by the year 2017, 20% of Canadians will be of a visible minority.
- More than half of all newcomers (58.3%) come from Asia, followed by those from Europe (16.1%), the Caribbean, Central and South America (10.8%), Africa (10.6%) and the United States (3.5%).

² "One can argue that all non-First Nation Canadian residents have their ancestral roots elsewhere" (Van Ngo, 2008, p.6.).

³ According to Pendakur (2000, cited in Pendakur 2005, p.10), "the term visible minority is somewhat contentious. We use the word visible to denote differences in skin tone, and we use the word minority to denote smallness or weakness in power relations." These minorities, either visible or non-visible, have different accents and manner of speaking, i.e., they are also audible minorities.

⁴ These sources are too numerous to reference in this report. An interested reader can refer to Van Ngo's reports (2000, 2008) for the sources of quick facts.

- About 95.8% of all immigrants who have been in Canada for 10 years or less live in Ontario (53.8%), British Columbia (17.8%), Quebec (15.5%), and Alberta (8.7%).
- About one in five Canadian residents (20.1%) has a first language other than English or French.
- In Canada, four religions have experienced remarkable growth during the time period 1991 to 2001 (83.8 to 128.9%): Sikhism, Hinduism, Buddhism and Islam.
- By the year 2030 immigration may become the only source of population growth in Canada.

“Often stereotyped as the ‘nice’ nation of the world, Canada is considered by many a haven of polite and law-abiding citizens” (Este, 2008). Despite this powerful claim, as well as the concurrent benefits of intervening international, federal, provincial and municipal legislation, immigrants/ethnic minorities/visible minorities are more likely to be marginalized and be in vulnerable situations.⁵ For instance in Canada (Van Ngo, 2008):

- Ethno-cultural members have low rates of participation and membership in sport teams, hobby clubs, community organizations and ethnic associations.
- Visible minorities tend to feel uncomfortable due to their ethnicity, culture, race, skin colour, language, accent or religion. This lack of a sense of belonging exists even with second generation Canadians of a visible-minority background.⁶
- Visible minorities in Canada often report low levels of life satisfaction.

⁵ International Convention on the Elimination of All Forms of Racial Discrimination (1965), United Nations International Convention on Economic, Social and Cultural Rights (1976), Canadian Charter of Rights and Freedoms (1982), Canadian Human Rights Act (1985), Canadian Multiculturalism Act (1988), Canadian Citizenship Act (1947), Immigration and Refugee Protection Act (2001), and Employment Equity Act (1995).

⁶ 44% of visible minorities feel a sense of belonging compared to 54% of non-visible minorities. Ironically, 61% of first-generation Canadians feel a sense of belonging.

- About 20% of visible minorities have experienced discrimination or unfair treatment regardless of whether they are first- or second-generation Canadians.⁷
- Immigrants tend to be in better health than the average Canadian when they arrive in Canada. The health of immigrants, however, deteriorates over time.
- Immigrants do not find adequate employment. (Approximately one in four newcomers with university degrees work in sales and service occupations, making them about twice as likely to be in this kind of employment compared with Canadian-born residents with the university degrees.)

Two noteworthy points arise from the above passage, a) it is predicted that approximately half the residents of Toronto and Vancouver will be visible minorities by the year 2017 (Statistics Canada, 2005, cited in Pendakur, 2005), and b) scholars continue to debate the necessity of Canada's multicultural policy. In a public forum, the opponent claimed "multiculturalism 'works' to the extent that it is a superficial veneer without much real meaning. The reality is that Canada assimilates immigrants—and that's a good thing." However, the proponent of the policy in this forum asserted "I think these policies have tremendously helped us to redefine an identity and institutional practices that are inclusive". ... "Right now we are facing challenges brought on by globalization, for example. Our 30-year-work on multiculturalism policy has helped Canadians face the challenges globalization brings to the country" (University of Calgary, 2008a, ¶ 5, 7).⁸

Such substantial, albeit continuous, increases in ethnic minority groups in rural and urban centres across Canada will continue to challenge all organizations (currently operating in a multicultural environment regarding colour and language) to deliver services that are appropriate

⁷ The most common places where perceived discrimination or unfair treatment have occurred include the workplace or when people apply for work (56%), a store, bank or restaurant (25%), on the street (26%), and when dealing with police or the courts (12%).

⁸ The public forum (April 24, 2008 at the Loose Moose Theatre in Calgary) was hosted by the Media Relations of the University of Calgary and the Royal Society of Canada. The debaters were Dr. Tom Flanagan (opponent), professor, Department of Political Science and Dr. Marie McAndrew (proponent), professor, Department of Education, University of Montreal.

and relevant to many diverse groups (Bernard & Moriah, 2007; Geron, 2002). These organizations and their employees must learn and adjust to the realities of a multicultural workplace.

The Canadian immigrant profile and the pattern of immigration drive the need to improve both individual and organizational “cultural competency.” The ‘Ice Metaphor’ would suggest that Canadian immigration policy is continually adding to Canada’s “hidden” culture (‘below the water level’), i.e., in the Canadian population there exist “habits, assumptions, understandings, values, judgments ... that we know but do not or cannot articulate” (Beer, 2008, ¶ 4). Thus, a pluralistic society, such as Canada, has to constantly face challenges of differences, misconceptions, and miscommunication on a daily basis.

Canadian organizations, whether large or small, can no longer ignore, nor be complacent about, being culturally competent. The value of implementing and/or adopting guidelines for cultural competency promises to serve the ‘greater good’, i.e., adopting guidelines are expected to yield positive effects on all Canadian cultures, be it ethnic minorities (or visible minorities) or the ethnic majority, in all aspects of life; the street, organization, family, community and employment. Equity experts (Wilson, 1997) articulate this premise as “The Business Case of Equity.” Recently the Calgary Herald (Sankey, 2008, p. H1; Winston, 2008, p. H3) published two articles suggesting that Canadian employers have accepted the value of embracing diversity, i.e., embracing and implementing the guidelines of cultural competency. In the same issue 20 Canadian firms were honoured for removing barriers to employment for new Canadians, i.e., “breaking the cycle of no Canadian experience, no job – no job, no Canadian experience for new Canadians” (Winston, 2008, p. H3).

In his 2008 report Van Ngo (p.15) reflected that “Canada will benefit at least \$13 billion in personal income and an increase of 400,000 extra workers in the labour force if foreign-born workers can enjoy the same likelihood of employment at the same average income as Canadian born persons.”

1.2 Organizational Cultural Competency

The literature documents several definitions of cultural competency. Two are provided below.

Cultural competence is a set of congruent behaviors, attitudes and policies that come together in a system, agency or professional and enable that system, agency or professional to work effectively in cross-cultural situations. The word culture is used because it implies the integrated pattern of human behavior that includes thought, communication, actions, customs, beliefs, values and institutions of a racial, ethnic, religious or social group. The word competence is used because it implies having the capacity to function effectively (Cross, 2008, ¶ 1).

Culturally competent activities include developing skills through training, using self-assessment tools, and implementing goals and objectives to ensure that governance, administrative policies and practices, and clinical skills and practices are responsive to diversity within the populations served (CEO services, 2008, ¶ 1)

According to California Tomorrow (2006, cited in Este, 2007, p. 99), "a cultural competent organization is engaged in an intentional and continuous process of learning about and responding to the cultural contexts of the communities and people it serves". Este (2007, p.99) articulates that a culturally competent organization requires the following action:

- "being intentional in recruiting and hiring diverse staff and board members;
- investing in professional development about issues of culture, cultural competence, diversity, and equity;
- creating the structure, time, and norms for productive dialogue;
- ensuring attention to cultural issues in outreach, programming, and service delivery;
- setting expectations that practices will be adapted to address the needs of the agency's diverse constituents and clients."

According to The National Center for Cultural Competence (Georgetown University Center for Child and Human Development, 2006, cited in Este, 2007, p. 99) a culturally competent organization ought to:

- “have a defined set of values and principles, and demonstrate behaviors, attitudes, policies and structures that enable them to work effectively cross-culturally.
- have the capacity to (1) value diversity, (2) conduct self-assessment, (3) manage the dynamics of difference, (4) acquire and institutionalize cultural knowledge and (5) adapt to diversity and the cultural contexts of the communities they serve.
- incorporate the above in all aspects of policy making, administration, practice, service delivery and involve systematically consumers, key stakeholders and communities.”

The literature is replete with cultural competence guidelines, prescribing “why” and “how” an individual and/or an organization can become culturally competent (Chicago Jobs Council cultural competency and employment initiative, 2008; Alberta Culture and Community Spirit, 2002, 2004; Van Ngo, 2000, 2008). These guidelines, as well as students of “culture,” caution practitioners not to define or utilize the term culture to describe a homogenous, static group (Williams, 2006; Este, 2007). In any cultural group there is within-group variation. Furthermore, behaviours, assumptions, and values of any cultural group fluctuate/change with external circumstances. Este (2007, p. 95) articulates this concept as, “newcomers to Canada are likely to retain the parts of their culture they regard as important and to embrace certain aspects of Canadian culture, thus forging a new culture that will evolve, develop, and change over time. Because of this fluid notion, the process of becoming culturally competent is an ideal state, but with no end point.... [it] requires life-long learning.”

Cultural competency work/research has rested primarily with human and social services which by and large are not-for-profit organizations (e.g., child welfare, health care etc.)

According to Cross, et al. (1989) an organization can measure its cultural competency progress according to its achievement of specific

developmental tasks. According to Cross, et al. (1989, cited in Alberta Culture and Community Spirit, 2002) an organization may exhibit behaviours or be at a point on the cultural competency continuum as follows:

- 'Cultural Destructiveness' implies that the organization supports policies, attitudes, and practice which are destructive to cultures and consequently to the individuals within the culture. The most extreme example of this orientation are programs which actively participate in cultural genocide--the purposeful destruction of a culture.
- 'Cultural Incapacity' implies that the organization lacks the capacity to help minority clients or communities.
- 'Cultural Blindness' implies that the organization functions with the belief that the colour or culture makes no difference and that we are all the same.
- 'Cultural Pre-competence' implies that the organization recognizes its inability as a system to provide appropriate services to a community composed of cultural diversity.
- 'Cultural Competence' implies that the organization respects differences among, and within, cultural groups and is actively involved with continuous self-assessment.

Lastly, the concepts and investigation of culture and cultural competence also subsume, or embrace, other diversity factors that include gender, ability, class, age, and sexual orientation. However, the discussion of cultural competence intuitively centres on racial and ethnic diversity because it simplifies the discussion (Van Ngo, 2000; Williams, 2006).

1.3 Calgary Scene

This section presents a brief summary of Calgary's immigration trends as well as the salient cultural competency initiatives in the city.

Calgary's Immigration Pattern

The City of Calgary has rapidly grown to become a multicultural metropolis attributed partially to Canadian immigration policy and a booming economy. According to TCF Calgarians assigned the City's effort in "valuing diversity" with a grade of C minus. Minorities have lost positions of influence between 2004 and 2007, and the hate/bias crimes have increased during the same period.

This does not bode well for both current and prospective Calgarians. According to a brief review of the immigration pattern in Calgary, statistics reported on the Calgary Health Region's website (CHR, 2008):

- There has been a decrease of European immigrants to Calgary between 1982 (41.1%) and 2002 (18.2%).
- There has been an increase of Asian immigrants to Calgary between 1982 (20.4%) and 2002 (56.6%).
- There has been a remarkable increase of South Asian immigrants to Calgary between 1982 (7.7%) and 2002 (35.4%). As the majority of these newcomers are visible minorities, they face obstacles such as language barriers and discrimination, and have a harder time settling than do immigrants with European experience.
- For the fifth consecutive year, India (14%), China (12.5%) and the Philippines (7.9%) were the leading countries of birth for immigrants to Calgary.
- The top ten countries that immigrants and refugees come from are:
 - India (14%)
 - China (12.5%)
 - Philippines (7.9%)
 - Pakistan (7.7%)
 - Republic of Korea (5.3%)
 - England (4.4%)
 - Iran (3.7%)
 - United States (2.2%)
 - Romania (2.2%)
 - Russia (2.1%)
- Calgary has also experienced a significant increase of people from the Ukraine, Nigeria, Sudan, Colombia, Sudan, and Afghanistan.

Cultural Competency Initiatives in Calgary

In January 1990, the Board of Directors of the United Way of Calgary and Area created a Task Force with a mandate to “develop relationships with ‘minority communities’ in order to assess social service needs and participation requirements of minority communities; increase opportunities for volunteerism; broaden the donor base, of the United Way; and remove perceived or actual barriers to access United Way and member agency services.” The Multicultural Organizational Change (MOC) initiative was considered timely because the United Way of Calgary and area and many segments of Calgary’s community (e.g., women’s movements groups, groups for the disabled, immigrant-serving organizations) observed that more and more Calgarians were slipping through the cracks and receiving inadequate or inappropriate services, if any services at all. In 1991, the initiative to target accessibility, inclusion and other diversity issues was new to Calgary and even to Canada as a whole.

Ultimately, between 1992 and 1996 more than 40 human services agencies were involved in the MOC process; 20 trainers, 250 agency change agents were trained, more than 3,000 staff and volunteers were involved in the MOC work. The MOC project and its evaluation were funded by the following four sources: a) United Way of Calgary and Area, b) Kahanoff Foundation, c) Alberta Multicultural Commission, and d) Canadian Heritage. Three critical lessons were learned by the MOC process, a) addressing barriers (i.e., achieving cultural competency) in Calgary’s human and social services is a difficult and challenging undertaking both on individual and organizational levels, b) the MOC process did raise awareness both on personal and organizational levels, and c) the stakeholders recognized that the existence of diversity is a “public good”. Similarly, issues arising from the existence of diversity in any community are a collective responsibility of the community rather than the domain or the responsibility of one visible (or non-visible) minority. See Chugh & Agger-Gupta (1997) for details of the MOC intervention and its evaluation. A key informant commented that “the society was not ready and ethnic proportions were different but it was a laudable effort, created a business case for diversity.”

From 1998 to 2004, the Cultural Diversity Institute (CDI) was established by the University of Calgary and the Government of Alberta. The goal of the Institute was to “support individuals and organizations engaged in public, private sector and not-for-profit activities in Alberta so that their workplaces and business practices are inclusive, equitable and respectful of cultural diversity” (University of Calgary, 2008, ¶ 1).

From 1997 to 2004, the Diversity Learning Institute (DLI) was formed as a by-product from MOC’s process to serve the Calgary’s not-for-profit social and human services organizations, i.e., the United Way of Calgary and Area funded agencies.

From 1998 to 2004, the City of Calgary (the corporation) developed a framework for Diversity Calgary designed to respond to issues of cultural diversity in Calgary by creating partnerships between the community and the non-profit and private sectors. On May 16, 2006, however, in a Town Hall meeting for the “Coalition of Municipalities Against Racism” it was stated that the “initiative [Diversity Calgary] produced some positive initiatives and networks, but was not sustainable for a variety of reasons including differences in vision, lack of funding, a disconnect between community supporters and decision makers, and unclear infrastructure” (The City of Calgary, 2006, ¶ 4).

One of the participants in this study lamented that the above experiences have thrown Calgary’s organizational cultural competency capacity “back to where we were in 1985.” The recently aborted initiatives and research projects failed to provide any definite lessons about cultural competency. Organizational cultural competency remains a challenge, an enigma, and an elusive phenomenon.

2.0 The Current Project

2.1 Rationale of the Project

In light of the above setback the Calgary Catholic Immigration Society (CCIS) applied for, and received funding from The Calgary Foundation (TCF) to assess what was needed. Which organizations are providing

organizational culturally competent services both internally (staff and employees) and externally (mentoring and modeling) in Calgary?⁹

The project matches the vision and values of both CCIS and TCF. Additionally, the project findings are expected to enhance CCIS's core business.¹⁰ As stated in the proposal the project reflects both the capacity building of the community as well as the capacity building of individual organizations. These goals are compatible with those of TCF.

2.2 Purpose of the Project

The project is a feasibility study that aims to map existing services and programs in Calgary that support cultural competency in organizational and community development.¹¹ This investigation will provide the impetus and the manner in which to expand cultural competency within Calgary with a specific focus on CCIS operations, such as, "cultural competency enhancement services."

3.0 Methodology

3.1 Approach

The project used a 30-minute survey composed of both quantitative and qualitative questions to obtain data from key informants from ten Calgary organizations. Both primary and secondary data were collected during the investigation. Lastly, the foci of the project are organizational teaching/learning and organizational transformation rather than an audit and/or reprimand or other forms of punitive consequences.

In consultation with the sponsor, the researcher opted to employ individual face-to-face interviews to collect data, rather than employing

⁹ Visit the CCIS website to view services offered.

¹⁰ The specific TCF vision statement that is addressed in the project is Calgary being "a healthy, vibrant community that embraces diversity and supports all of its people." The specific value statement addressed in the project is that "[TCF administrators] value diversity and are committed to building an inclusive, respectful, and caring organization and community." (<http://www.thecalgaryfoundation.org/pdf/VisionMissionValues.pdf>)

¹¹ The term feasibility is used to reflect the challenge in acquiring accurate information. Thus, is it even feasible to collect such data?

a focus group methodology. This allowed the researcher to, a) probe as the response was being generated, b) provide ample opportunity for the participants to recall and to articulate responses, and c) create a rapport between the researcher and the participants to create a more real, or utility-based, investigation for the researcher and the participants. The focus group technique, on the other hand, has the potential to mask individual ideas, experience and contribution.

3.2 Sample

Both the participant and organization samples were recommended by the project sponsor. In total, 16 participants representing 11 Calgary organizations were invited to participate in the study.

3.3 Research Questions

The following six research questions guided the project:

1. In the past five years what community organizations have delivered cultural competency services or have otherwise expressed/portrayed culture competency? What is the nature of the services? Who are the target(s) of these services?
2. What is the broad community need/rationale for such services?
3. How can the Calgary community be engaged in cultural competency development?
4. What are the gaps in services and support?
5. Can one identify best practices in the area of cultural competency? If so, are they widely accepted and well-known?
6. How can community resources be coordinated?

3.4 Instrument

A face-to-face semi-structured interview schedule was developed in conjunction with the sponsor (Diane Fisher) of the CCIS (Appendix D). The instrument consists of eight questions. Some of these questions (Questions 1, 2, 6, and 7) have sub-questions. Questions 3, 4, 5 and 8, however, are conceptually not branched, and as such do not contain sub-questions.

The instrument consists of both open- and closed-ended questions. The 11 open-ended questions are: Questions 1a, 1b, 1c, 4, 5, 6a, 6b, 6c, 7a, 7b, and 8. Only one question (Question 2) with 13 items was designed as scalar inquiry, i.e., the respondents were asked to rate their agreement with the item on a five-point agreement scale: strongly agree, agree, neither agree nor disagree, disagree, strongly disagree). The 13 items were extracted from Van Ngo's (2000) cultural competency self-assessment guide to "rapidly" gauge organizational competency. The remaining closed-ended questions (3, 6c, and 7b) were designed to elicit categorical data.

Of note, multiple survey questions were designed to elicit information about the manner in which the organization provides culturally competent training (3, 6a, 6b and 6c, 7a, and 7b). Questions 4 and 5, respectively, were designed to elicit how an organization (through trained personnel) models itself as a culturally competent organization, and/or mentors cultural competency concepts to other organizations. The acts of modeling and mentoring reflect that the recipients of the "training" will then move the acquired knowledge to a utilization level, i.e., they are on the way to being "educated." According to Merriam-Webster Online dictionary (2008) the term model "applies to something taken or proposed as worthy of imitation," and the term mentor is defined as "a trusted counselor or guide."

At times the instrument question addressed more than one research question. Sometimes multiple instrument questions addressed a single question. For instance, all of the instrument questions could possibly address the first research question (Section 3.3).

3.5 Data Collection/Data Sources

From January to April of 2008 the researcher conducted 15 face-to-face semi-structured interviews (each approximately 30 minutes in duration) with key informants that represented 11 Calgary organizations. All of the interviews were conducted by a single interviewer to minimize bias and to

be able to collect comparable and standard data. The following organizations participated in the study:¹²

1. Calgary Catholic Immigration Society (CCIS): 3 key informants
2. The City of Calgary (C of C): 3 key informants
3. Plan:Net Ltd (PN): 1 key informant
4. Canadian Heritage (CH): 1 key informant
5. Ethno-Cultural Council of Calgary (ECCC): 1 key informant
6. United Way of Calgary and Area (UWCA): 2 key informants
7. Calgary Multicultural Centre (CMC): 1 key informant
8. Volunteer Calgary (VC): 1 key informant
9. The University of Calgary (U of C): 1 key informant
10. Human Rights and Citizenship, Tourism, Parks, Recreation and Culture (TCRP)¹³: key informant=1
11. Remesa Consulting Ltd (R): 1 key informant

Each key informant was contacted by telephone to, a) introduce the researcher to the potential participant, b) briefly discuss the purpose and the sponsor of the project, and c) set up a time and place of the interview. Regarding point "c)" all interviews, with the exception of one, were conducted in the participants' offices.

The participants were provided with two copies of an informed consent form to be signed by both the researcher and the participant. The consent form outlined pertinent details of the study (purpose) and clearly outlined issues of confidentiality and anonymity. The participant and the researcher each received a jointly-signed copy for their records. (See Section 3.7.)

¹² The limitations of time and other resources prohibited the researcher to include the Calgary Health Region (CHR) in the sample although it would have been a good source for cultural competency initiatives in Calgary.

¹³ Formerly it was referred to as "Alberta Community Development" and during the project the name of the division was changed to "Human Rights and Citizenship, Culture and Community Spirit."

3.6 Data Analysis

All quantitative data that emerged from face-to-face interviews with the key informants (19 variables) were analyzed using the Statistical Package for the Social Sciences (SPSS 16.0 for Windows). Appropriate frequency distributions were computed. The sample size and the nature of the quantitative data prohibited the author from testing any hypotheses. All open-ended qualitative responses (whether audio-tape or paper-pencil recording) were analyzed by means of content analysis. In content analysis, the unit of analysis may be a word, phrase, or a comment, rather than the individual respondent's score.

The researcher excluded all open-ended data from analysis that were deemed off-topic or irrelevant to the question. When necessary, the open-ended responses were edited for clarity but still retained the tone and the meaning of the comments.

3.7 Ethical Considerations

The study protocol was approved in December, 2007 by the Conjoint Faculties Research Ethics Board (CFREB) of the University of Calgary (Appendix A). The CFREB critically reviewed the following, a) a script for the researcher's first telephone contact with the "primary" key informant (Appendix B), b) a script for the researcher's first telephone contact with the 'secondary' key informant (Appendix C), c) the study instrument (Appendix D), and d) the consent form.

The consent form clearly disclosed that, a) the data would not be collected anonymously. In the final report, b) the name of the organization and its initiative(s) would be linked without divulging the identity of individual key informants, c) the names of the external consultants would not be divulged but the evaluation of their initiatives would be, and finally, d) the names of the external consultants would only be revealed in the report prepared for the sponsor (CCIS).¹⁴ That is, the

¹⁴ This step ensures that the performance of external consultants' remain, by and large, confidential but at the same time maximizes the utility of the findings.

author would produce two reports, one for the sponsor and one for wider dissemination. This report is generate for wider dissemination.

3.8 Limitations of the Methodology

The small convenience sample drawn from both the organizations as well as the key informants prohibits generalizing the findings across other organizations and/or the population at large. ¹⁵

Moreover, the data collected are self-reported and therefore prone to bias.

4.0 Findings

4.1 Background

The author recognizes two participant types, the key informants and the organizations. Throughout the report, where applicable, this distinction has been emphasized. At times the unit of analysis is the individual key informant and at other times the unit of analysis is the organization. The author also recognizes samples of key informants and the organizations they represent are small for a city-wide generalization.

4.2 Key Informants' Profile

Sixteen individuals (100% response rate) hereafter referred to as participants or respondents participated in the study. For two diversity variables, ethnic background and gender, the participants produced the following distribution: eight were of ethnic minorities and eight were of the ethnic majority. Eight males and eight females participated. In total, 15 semi-structured interviews were conducted. One interview (CCIS) included two participants.

¹⁵ Generalizability is "the extent to which research findings and conclusions from a study conducted on a sample population can be applied to the population at large." (<http://writing.colostate.edu/guides/research/glossary/>)

The 11 participating organizations belonged to different sectors: 5=non-profit, 3=public sector, 2=private sector/for-profit, and 1=post-secondary institution.

4.3 Key Informants' Organizations

The following organizations participated in the study:

1. Calgary Catholic Immigration Society: key informants=3
2. The City of Calgary: key informants=3
3. Plan:Net Limited: key informant=1
4. Canadian Heritage: key informant=1
5. Ethno-Cultural Council of Calgary: key informant=1
6. United Way of Calgary and Area: key informants=2
7. Calgary Multicultural Centre: key informant=1
8. Volunteer Calgary: key informant=1
9. The University of Calgary: key informant=1
10. Human Rights and Citizenship Tourism, Parks, Recreation and Culture: key informant=1
11. Remesa Consulting Ltd: key informant=1

4.4 Survey Findings

The following findings are organized by survey question, not by quantitative or qualitative data. The section maintains the same sequence that appears in the interview schedule. Lastly, this section does not link the findings to the research questions posited previously (Section 3.3) in this report. The link will be established in Section 5.0.

In the past five years, has your organization assessed its own cultural competency? (Question 1)

Ten (of 16) respondents reported that in the past five years their organizations were involved in assessing their own cultural competence, i.e., they focused on the organization. Key informants of eight (of 11) organizations reported that their organizations were involved in self-assessment.

Participating organizations adopted one or more of the following seven procedures that assist an organization to assess its cultural competency (Question 1a).

1. Hire external consultants
2. Keep current with cultural competency literature/build general awareness
3. Conduct an organizational strategic plan
4. Review organizational material and documents
5. Encourage input from staff
6. Make efforts to hire diverse staff, board, and volunteers
7. Use established guidelines (e.g., Hieu Van Ngo's guide, 2000)

Only four organizations responded to survey Question 1b of the survey referring to the outcome of the organizational assessment. Two organizations reported satisfaction with their organizational cultural competency and two organizations expressed that they could do much more. A key informant stated "we could do more to be more relevant to cultural and racially diverse groups in the city of Calgary with our services that we provide."

Another organization's key informant cautioned decision makers from falling into a sense of false security for "if you go too superficial it's too easy to [say] it's great, diversity's great ... we all love each other." Of the participating organizations that did not assess their own cultural competency, their key informants provided the following reasons:

- The organization has not yet embraced the need for that sort of exercise
- There is no integrated or corporate-wide strategy
- There has been a lack of leadership
- The organization was formed to address diversity or cultural competence

***What are the measures for organizational cultural competency?
(Question 2)***

Table 1a presents the key informants' opinions of the cultural competency status of their respective organizations based on 13 items designed to gauge organizational cultural competency. Table 1a organizes the

information in a descending order of frequency of agreement by individual key informants, whereas Table 1b organizes the degree of agreement with 13 items by participating organizations and in a descending order of frequency of agreement. See Section 5.0 for the interpretation and the discussion of the findings.

Table 1a: Agreement with elements of organizational cultural competency by individual participants

Item	Strongly Agree or Agree N=15
1. My organization is cognizant of the cultural diversity in Calgary.	13 (86.6%)
2. The Executive Director of my organization leads in creating an environment that is respectful to all clients.	12 (80%)
3. The operational procedures/guidelines mandate that the organization has a clear statement addressing culturally biased language, behaviours or practices.	12 (80%)
4. The Executive Director of my organization leads in creating an environment that is respectful to all employees.	11 (73.3%)
5. My organization collects, maintains and analyzes culturally specific data.	11 (73.3%)
6. My organization reviews research pertaining to the experience of culturally diverse populations in service area the organization is involved in.	11 (73.3%)
7. My organization sets aside staff time for cultural competency training/awareness.	9 (60%)
8. My organization's mission statement refers to services for culturally diverse people.	9 (60%)
9. My organization allocates adequate resources to implement culturally competent policy.	5 (33.3%)
10. My organization regularly utilizes the cultural expertise of culturally diverse groups in delivering culturally relevant services.	5 (33.3%)
11. The board of directors ensures that its members represent relevant culturally diverse groups.	5 (33.3%)
12. My organization regularly evaluates impacts of its programs/projects on culturally diverse clients.	4 (26.6%)
13. My organization regularly utilizes the expertise of culturally diverse groups in setting culturally sensitive hiring policies.	3 (20%)

Table 1b: Agreement with items of organizational cultural competency by participating organizations

Item	Strongly Agree or Agree N=11
1. My organization is cognizant of the cultural diversity in Calgary.	9 (81.8%)
2. The Executive Director of my organization leads in creating an environment that is respectful to all clients.	9 (81.8%)
3. The operational procedures/guidelines mandate that the organization has a clear statement addressing culturally biased language, behaviours or practices.	9 (81.8%)
4. My organization collects, maintains and analyzes culturally specific data.	9 (81.8%)
5. My organization reviews research pertaining to the experience of culturally diverse populations in service area the organization is involved in.	9 (81.8%)
6. The Executive Director of my organization leads in creating an environment that is respectful to all employees.	8 (72.7%)
7. My organization set aside staff time for cultural competency training/awareness.	7 (63.6%)
8. My organization's mission statement refers to services for culturally diverse people.	7 (63.6%)
9. The board of directors ensures that its members represent relevant culturally diverse groups.	5 (45.4%)
10. My organization allocates adequate resources to implement culturally competent policy.	4 (36.3%)
11. My organization regularly utilizes the cultural expertise of culturally diverse groups in delivering culturally relevant services.	4 (36.3%)
12. My organization regularly evaluates impacts of its programs/projects on culturally diverse clients.	4 (36.3%)
13. My organization regularly utilizes the expertise of culturally diverse groups in setting culturally sensitive hiring policies.	3 (27.2%)

Note: Satisfaction scale: Strongly agree, agree, neither agree nor disagree, disagree, and strongly disagree

**How does your organization provide culturally competent training?
(Question 3)**

Table 2 depicts how the participating organizations provide culturally competent training within the organization. The question aims to determine the type of culturally competent training the organization provides for the staff, the board, and the volunteers. The majority (9 of 11, 81.8%) of the organizations bring in external trainers to familiarize their staff, board and volunteers with topics related to cultural competency. The majority (8 of 11, 72.7%) also turn to their internal champions and/or

trainers for the same purpose. Less than half (45.4%) of the organizations employ other means and methods to train their staff, board and volunteers.

Table 2: Modes of cultural competency training

Mode	Frequency <u>N</u> =15	Number of Organizations <u>N</u> =11
External	11 (73.3%)	9 (81.8%)
Internal	11 (73.3%)	8 (72.7%)
Other	6 (40%)	5 (45.4%)
All three	5 (33.3%)	4 (36.3%)
Two	5 (33.3%)	4 (36.3%)
None	3 (20%)	1 (9%)

How does your organization model itself as a culturally competent organization within the community? (Question 4)

Table 3a portrays six themes concerning “how to model” that were extracted from the responses in the content analysis process (Section 3.6). Some illustrative examples are also provided to define the themes.

Table 3a: Themes defining how the organizations model themselves as culturally competent

Theme	Examples
1. Composition of personnel mirrors Calgary's population	<ul style="list-style-type: none"> o create an organizational business culture to mirror the Calgary culture o hire a lot of culturally diverse front line workers o try to get more diversity on the board o increased cultural diversity in the staff
2. Through organizational services	<ul style="list-style-type: none"> o try to model itself as a culturally diverse service, for instance, police and fire, and EMS o through programs, services, and events
3. Collaborate/partner with other organizations and community	<ul style="list-style-type: none"> o sign up with other municipalities. There are thirteen municipalities across Canada in a coalition to address racism, discrimination in our community o connect to the community o create collaborative model to help organizations have a voice o actively outreaching to culturally specific groups to get more employees
4. Maintain a professional stance	<ul style="list-style-type: none"> o maintain a profession that is steeped in awareness of diversity and of the multicultural environment in which we operate
5. Help organizations model themselves	<ul style="list-style-type: none"> o try to convince other non-profit organizations on how to behave with volunteers and we try to be the model for that
6. Material and resources reflect the community	<ul style="list-style-type: none"> o check to see whether or not materials developed are reflective of the community o try to develop resources to support cultural competency o market and rely on recipients' testimonials

How does your organization mentor other organizations to become culturally competent organizations? (Question 5)

Table 4a portrays six themes concerning "how to mentor" that were extracted by performing content analysis with the responses (Section 3.6). Some illustrative examples are also provided to define the themes.

Table 4a: Themes defining how the organizations mentor other organizations

Theme	Examples
1. Be a cultural broker	<ul style="list-style-type: none"> o act as cultural brokers for many organizations o create a regional outreach program (by first validating what they have worked on and how we can continue working on those areas and I think that is one of the keys as to why organizations come to work with us)
2. Increase understanding/training of cultural competency	<ul style="list-style-type: none"> o go out to other organizations and do this kind of training and work
3. Increase awareness and knowledge of cultural competency	<ul style="list-style-type: none"> o through education and teaching of students but as an institution o ethno-cultural engagement study
4. Sit on the discussion table	<ul style="list-style-type: none"> o create a range of choices (the kinds of things that we're always bringing to the table)
5. Be perceived as an expert	<ul style="list-style-type: none"> o walk side-by-side with people who may have to do those tasks and just making suggestions o fund organizations and provide expertise to organizations o HR area in particular in hiring as kind of a place of best practice
6. Share expertise, research design and findings, and practice	<ul style="list-style-type: none"> o through partnerships and collaborations o share expertise, research, and practices

List of external consultants (Question 6a)

When asked, the key informants provided a list of external consultants who were employed for organizational and/or individual cultural competency training or education. The key informants permitted the researcher to disclose the names of the external consultants in the “not-so-widely” distributed report, i.e., the report generated for only the CCIS manager. However, upon reflection the researcher deemed this information to be both confidential and not particularly useful in its current state.

The available data did not allow the researcher to be able to grade the external consultants with regard to either their proficiency or excellence in cultural competence training or with regard to the importance of their topics. In closing however, there are three noteworthy points, a) often the external consultants are affiliated with prominent Calgary organizations, e.g., the Calgary Health Region, and the University of Calgary, b) at times the external consultants operate outside of Calgary, c) occasionally the

external consultants operating within Calgary consult outside of Calgary, and d) some consultants maintain websites.¹⁶

The following list depicts topics covered by external consultants and is arranged by organization.

- o communication in a diverse environment
- o leadership in a pluralistic society
- o diversity awareness
- o homelessness in Calgary
- o a community plan around diversifying Calgary's leaders, diversifying Calgary's services and programs
- o general analysis
- o power analysis
- o cultural audit
- o needs analysis
- o staff awareness about the importance of effective communication
- o what is cultural competency?
- o what does diversity mean?
- o current practices
- o self-analysis
- o smorgasbord of unconnected diversity training initiatives
- o as dictated by the curriculum of the Portland Institute

Utility of the external consultants (Question 6b)

Question 6b elicited anecdotal data regarding the value of hiring external consultants to train staff, board members, and volunteers. The following section provides the benefits, or "no benefits," of contracting external consultants.

External consultants add value to the organization

At least one organization felt that it had the following positive impacts:

- Increased level of job satisfaction

¹⁶ To name a few websites: Culture Connect (<http://www.culture-connect.com/>), impact@work inc. Services (<http://impactatwork.com/default.aspx>), KANATA INTERCULTURAL CONSULTING INC. (<http://www.kanataint.ca/>).

- Increased self-awareness (organizational self-awareness) and or lessons learned (things we do well and things we don't do well)
- People [recipient of the training] were very enthusiastic
- Recipient of training received formal credentials

External consultants did not add value to the organization

- External consultants were helpful in running a process of community identification and assessment, but it became too large a project to try and handle and it became fractured and ended
- One cannot achieve a whole lot in a three hour kind of event. Everybody came from a different place in terms of what they were trying to offer and it wasn't necessarily grounded in best practices
- We know that it could've been a lot deeper so we're in the process of looking for someone else to help us this year that can actually work with our organization and really drill down to some of the deep elements of cultural competency and really challenge us

Would you recommend the external consultants to other organizations?
(Question 6c)

Less than half (45.4%, 5 of 11) of the key informants whose organizations hired external consultants would recommend them to other organizations, i.e., they would rehire the same consultants. Two organizations claimed that they would recommend the external consultants because they achieved "positive outcomes" within the organizational domain, and the recipients perceived a "sense of genuineness."¹⁷

One organization that would not recommend the external consultants felt that the training was "sort of specific, without knowing there isn't such a universally recognized expertise. It's a little bit of here, little bit of there. It's very hard to have the confidence to say if you're doing well in this, you

¹⁷ Neither the phrase "positive outcomes" nor "sense of genuineness" was defined and/or expounded upon.

will be able to do well on that.” The same key informant added that the “process [was] too shallow.”

Internal cultural competence training, modeling or mentoring topics (Question 7a)

When asked, five (of 11) organizations reported they employed internal experts to cover the following topics:

- awareness raising, skill building
- community engagement
- racism in Canada
- very basic overview on institutional change
- cross-cultural communications training
- cultural awareness
- cultural competence
- leadership
- bias replacing
- culturally specific communication
- awareness training
- skills in hiring to minimize bias
- definition, and a review of policies, of procedures where improvement needed
- organizational cultural audit
- scenario-building exercise

More than one third (36.3%, 4 of 11) of organizations reported that their internal experts help to provide cultural competence training, modeling, and mentoring to other organizations. Only one organization elaborated on this concept. Experts from one organization provide training to multiple organizations that include schools, human services (also mainstream services), community service centres, police services, etc., in all Calgary sectors. Also see Table 4b.

Additional comments (Question 8)

In response to Question 8, the key informants provided 17 substantive comments regarding their view of cultural competency in general and culturally competent organizations, specifically. Content analysis of the

responses helped to identify eight recurrent themes. Given the small pool of comments, the researcher was not able to organize the themes in order of importance of frequency of comments.

Table 5: Content analysis of general comments

Theme	Examples
1. Create a central location	<ul style="list-style-type: none"> o Local market for consultants to in-service on specific diversity topics. It would help us keep up-to-date o Create a virtual centre based on solid grounding to, a) establish credibility, confidence, and trust, etc., and b) standards and credentials for external evaluators
2. Optimize community needs with an academic theoretical framework	<ul style="list-style-type: none"> o Academics make it more difficult than it needs to be o The language is very academic. For an average person, they don't understand it and they get terrified o I think cultural competency has become a jargoned word o "Us" and "them" are terms that we need to take out from our vocabulary on cultural competency
3. Cultural competency initiatives not only for minorities	<ul style="list-style-type: none"> o Well I see cultural competency is not working with the minority groups. Cultural competency needs to work with the mainstream to help them change their perspective and their mindset
4. Explore power relations and privilege	<ul style="list-style-type: none"> o Nobody wants to talk about power, nobody wants to talk about hidden privileges, and nobody wants to talk about invisible things. I mean Peggy Macintosh wrote her article a long time ago about the invisible knapsack and hidden privileges and white privileges so all these things we need to be talking about o (A body of literature exists on this issue. Recent book by Carr & Lund (2007) sheds light on this issue.)¹⁸
5. Training does not "rise up" to education and change of attitude	<ul style="list-style-type: none"> o There needs to be other changes that need to be taking place with the training to make it more a practice. For instance one needs to explore bigger issues like discrimination, understanding oppression, understanding racism, understanding dynamic of power o There's not enough awareness o Training could increase stereotypes, it could increase racism
6. Find leaders in organizations	<ul style="list-style-type: none"> o Anything that brings up culturally diverse abilities and competencies is outside of the norm of comfort of the leadership primarily. Whether that's council or the head administration o Leaders don't interact with people of other cultures (reflecting that the leaders are mostly from a white background) o There's no recognized leadership
7. Monitor the content of training and the expertise of trainers	<ul style="list-style-type: none"> o There's no recognized credibility either or expertise by any given current service provider in this area. And the people who work in the area, in the area of cultural competency, have to be creative, flexible, respectful, you know we need to work with the grassroots
8. Motivation/model to serve	<ul style="list-style-type: none"> o With the diverse population more than looking at the deficit, looking at the strengths that those communities bring into the larger community and I think we also need to stop saying "us" and "them"

¹⁸ A foreword by George J. Sefa Dei asserts that "The fact that most of the decision-makers are White, and it is these people who control the funding, the laws, programs and policies, means that it is often an uphill battle just to get racism formally identified as a concern" (Sefa Dei, G. J., 2007, p. viii).

5.0 Discussion

This project of cultural competency was not motivated by previous cultural competency initiatives in Calgary, such as MOC, DLI, CDI and Diversity Calgary. In fact there is a scarcity of documentation to refer to the successes (or failures) of these initiatives.

By the same token, the author/project does recognize that with all initiatives and the hard work of numerous external consultants, the idea or concept of cultural competency has moved forward from “the dance, dinner, and dialect” phase of the 1970’s to current serious efforts that strive to make individuals and organizations culturally competent. However, the development of a culturally competent organization is a journey “that evolves over time” (Este, 2007, p. 100). According to the results of the project “Calgary’s Vital Signs,” Calgarians graded the city’s “valuing diversity” module as a C minus.¹⁹ Visit the TCF’s website to participate in an online grading process for “Calgary’s Vital Signs” report card. As an aside, the same report asserts “new Calgarians add to the cultural vibrancy of our city, but they have also brought to light the startling lack of resources and opportunities available to them” (<http://www.calgaryvitalsigns.ca/documents/VitalImpact2008final.pdf>).

For Calgary to be safe and welcoming for all Calgarians it must be a culturally competent city. This is a necessary condition! Although the current project does not portray scientific rigour, nonetheless it did aim to gauge organizational cultural competency using a rapid methodology.

With regard to Research Question 1 (Section 3.3)²⁰, the findings of this study revealed that the participating Calgary organizations (8 of 11) undertook an organizational self-assessment or cultural audit. A look at the elements of the organizational assessment revealed that nine (of 11) participating organizations were cognizant of the diversity within Calgary. Additionally, the majority of (8 or 9 of 11) participating organizations

¹⁹ According to the report the number of positions of influence held by visible minorities and women have decreased between 2004 and 2007, but concurrently the rate of hate/bias crimes has increased.

²⁰ In the past five years what community organizations have delivered cultural competency services or have otherwise expressed/portrayed culture competency? What is the nature of the services? Who are the target(s) of these services?

reported that a) the organization mandates that there be a clear statement addressing culturally biased language, behaviours or practices, b) the Executive Director leads and creates an environment that is respectful to all clients and staff, c) the organization collects, maintains, and analyzes culturally specific data, and d) the organization reviews research pertaining to a culturally diverse population. However, fewer organizations (3 to 5 of 11) reported that the: a) the organization regularly utilizes the expertise of culturally diverse groups in setting culturally sensitive hiring policies, b) the organization regularly utilizes the expertise of culturally diverse groups in setting culturally relevant services, c) the organization regularly evaluates impacts of the programs/projects on culturally diverse clients, and d) the board of directors ensures that its members represent relevant culturally diverse groups. See Table 1b.

The above findings help to illustrate that an organizational self-assessment or cultural audit is a labour- and resource-intensive procedure. This project utilized only a few of the self-assessment measures/indicators as recommended by Van Ngo (2000, 2008). The guidelines are founded on sound cultural competency principles and measurements but they might not be user-friendly. Organizations may not have the necessary resources and time to follow these guidelines.

In further addressing Research Question 1 (Section 3.3), the key informants reported the procedures used for organizational self-assessment were as follows: a) hired external consultants, b) kept current with cultural competency literature, c) conducted an organizational strategic plan, d) reviewed organizational material, e) encouraged input from staff, f) made efforts to hire diverse staff, board members and volunteers, and g) used established guidelines.

The majority (8 of 11) of organizations employed both external and internal consultants/experts to train (and/or to raise awareness) their staff, board members and volunteers in the principles and practice of cultural competency (Table 2). The key informants reported that the external consultants addressed a range of cultural competency training topics that included:

- communication in a diverse environment
- leadership in a pluralistic society
- diversity awareness
- homelessness in Calgary
- a community plan around diversifying Calgary's leaders,
- diversifying Calgary's services and programs
- general analysis
- power analysis
- staff awareness about the importance of effective communication
- what is cultural competency?
- what does diversity mean?
- current practices
- self-analysis
- smorgasbord of unconnected diversity training initiatives

To enhance the cultural competency journey, Calgary organizations model themselves as culturally competent and mentor similar organizations to become culturally competent thereby transforming Calgary to a more culturally competent city.

The participating organizations reported the following modeling actions (see Table 3a for examples):

- ensured that the staff, board and volunteers diversity mirrored the diversity in Calgary's population
- ensured that services were culturally competent
- created internal consultants' positions
- maintained a professional stance
- helped other organizations to become culturally competent

An organization provides mentorship to other organizations to become culturally competent with one or more of the following actions (see Table 4a for examples):

- be a cultural broker
- increase understanding/training of cultural competency
- increase awareness and a knowledge of cultural competency
- sit on the discussion table
- be perceived as an expert

- share expertise, research design and findings, and practice

In summary, Calgary's human and social services organizations have increased an appreciation of cultural competency. Some organizations have been involved in cultural audits and have engaged external consultants to commingle with their internal resources to train (and educate) their staff, board and volunteers. Training covers the topics of individual, organizational, and community cultural competency.

In response to Research Question 2 (Section 3.3)²¹, it can be asserted that cultural competency within Calgary's organizations (e.g., staff, board training/education, and cultural audit) ultimately impacts the community at large, i.e., reduction of racism and the success of immigrants to find equitable and satisfying employment etc. Furthermore, the need for a variety of cultural competencies is also rooted in the following facts, a) the change in Calgary's demography, b) the number of hate/bias offences are on the rise in Calgary, and c) the workplace is the most common place where immigrants face discrimination. Lastly, notwithstanding the issues raised in points "b)" and "c)", cultural competency initiatives must exist for business and economic reasons.

In response to Research Question 4 (Section 3.3)²², the available data reflected the following gaps and/or needs concerning cultural competency:

- Only a few organizations are able to
 - allocate adequate resources to implement culturally competent policies
 - utilize the expertise of culturally diverse groups in setting culturally sensitive hiring policies or services
 - regularly evaluate the impacts of its programs on culturally diverse clients

²¹ What is the broad community need/rationale for such services?

²² What are the gaps in services and support?

- The external consultants are perceived as a critical resource, or capital, to provide training and for the development of culturally competent organizations but there is a lack of
 - a database of external evaluators and their functions. It makes it difficult for the organizations to select either, an appropriate topic or, an external consultant
 - agreed upon and standardized training material or quality assurance methodologies (to guard against misleading information and/or latent/blatant stereotyping.) One key informant articulated that “without knowing ... a universally recognized expertise. It’s a little bit of here, little bit of there. It’s very hard to have the confidence to say if you’re doing well in this, you will be able to do well on that.”
 - shared resources (human, monetary, material)
 - shared understanding and terminology
- Only half of the eligible organizations would recommend the external consultants they had employed for training purposes. One of the key informants (manager) felt that the process was too shallow. The participant felt “if you go too superficial it’s too easy to [say] it’s great, diversity’s great ...we all love each other.”

Lastly, both the human services organizations and the external consultants pursued and developed the conceptual framework and the necessary materials in a spirit of competition rather than one of collaboration.

In reference to Question 5 (Section 3.3)²³, the literature identifies the following best practices concerning organizational cultural competency programs within organizations. According to California Tomorrow (2006, cited in Este, 2007, p. 99) a culturally competent organization ought to “have the capacity to (1) value diversity, (2) conduct self-assessment, (3) manage the dynamics of difference, (4) acquire and institutionalize cultural knowledge and (5) adapt to diversity and the cultural contexts of the communities they serve.”

²³ Can one identify best practices in the area of cultural competency? If so, are they widely accepted and well-known?

In reference to Questions 3 & 6, the community, that is, the city of Calgary, will forge ahead with both organizational and community cultural competency, if the following necessary conditions are met: ²⁴

- Calgary needs a central location for organizational cultural competency;
- A cultural competency framework needs to be a combination of community experience and an academic framework;
- Organizations need to accept and understand that cultural competency initiatives are not only for minorities;
- Researchers and practitioners need to explore power relations and privilege and encourage inclusion;
- Cultural competency training needs to transform cultural competency education (effect a change in attitudes);
- Organizations need to find internal leaders;
- Researchers and practitioners need to use a resiliency, or 'needs and assets' model, rather than a typical 'deficit' model to explore and expand cultural competency possibilities;
- Long-term, rather than short-term (piecemeal), funding be provided to help integrate gains made by individual organizations;
- Increased level of collaboration and sharing, e.g., sharing of training/education and capacity building material needs to be encouraged; and
- Increased level of accountability for external consultants needs to be implemented. Based on observations and presence in the field for about two decades, a key informant observed that the current level of "Calgary's organizational cultural competency capacity is back "to where we were in 1985." As a reminder, the first large-scale Calgary initiative (MOC) was undertaken between 1992 and 1997.

The participating organizations in this project are cognizant that their organizations can do more to become culturally competent. The participating organizations view themselves to be in a "Cultural Pre-

²⁴ The reason for responding to Questions 3 and 6 conjointly is that they both relate to the community at large. How can the Calgary community be engaged in cultural competency development? How can community resources be coordinated?

competence" stage. According to the cultural competency continuum popularized by Cross (2008), it implies that the organization recognizes its inability as a system to provide appropriate services to a community composed of cultural diversity.

6.0 Conclusions

The study demonstrates how local cultural competency data can be utilized to further develop organizational cultural competency concepts and practices. This exploratory project not only reiterates perennial questions but also raises new ones. In conclusion, after two decades of pondering, researching, and disseminating cultural competency interventions a critical question still remains "why are ethno-cultural groups the recipient of human rights violations?" A key informant attempted to address the above question. Cultural competency is "... a much longer and a deeper journey. It will come. Measurements cannot be in terms of weeks and months."

7.0 References

Alberta Culture and Community Spirit (2002). *Diversity education research project: A literature review*. Retrieved March 12, 2008 from <http://culture.alberta.ca/humanrights/publications/docs/LiteratureReview.pdf>

Alberta Culture and Community Spirit (2004). *Diversity education for change: A guide to planning and management*. Retrieved March 12, 2008 from <http://culture.alberta.ca/humanrights/publications/docs/DivEdTools.pdf>

Beer, J. E. (2008). *Culture at work: Cross-cultural. The iceberg metaphor*. Retrieved April 22, 2008 from <http://www.culture-at-work.com/iceberg.html>

Bernard, W.T., & Moriah, J. (2007). Cultural competency: An individual or institutional responsibility? *Canadian Social Work Review* (24)1, 81-93.

Calgary Health Region (2008). *Healthy diverse populations: Demographics*. Retrieved March 12, 2008 from http://www.calgaryhealthregion.ca/programs/diversity/demographics_main.htm

California Tomorrow (2006). *Cultural competency: What it is and why it matters*. Oakland, CA: California Tomorrow.

CEO Services (2008). *Cultural competence online*. Retrieved March 22, 2008 from <http://www.culturalcompetence2.com/servcs.html>

Chicago Jobs Council cultural competency and employment initiative (2008). *Ready? Set. Grow! A starter's guide for becoming culturally competent*. Retrieved March 12, 2008 from http://www.cjc.net/publications/5_Capacity_Building_PDFs/ReadySetGrow_StarterGuide_CultComp.pdf

Chugh, U., & Agger-Gupta, N. (1997). *MOC's impacts: A description and evaluation of the United Way of Calgary and area's multicultural organizational change initiative 1991-1996*. Alberta Community Development and United Way of Calgary and Area.

Colorado State University Website (2007). *Writing guides, generalizability & transferability*. Retrieved March 16, from <http://writing.colostate.edu/guides/research/glossary/>

Cross, T., Bazron, B. J., Dennis, K. W., & Isaacs, M. R. (1989). *Towards a culturally competent system of care*. Washington, DC: CASSP Technical Centre.

Cross, T. L. (2008). *Cultural Competence Continuum*. Retrieved March 16, from <http://www.nysccc.org/T-Rarts/Articles/CultCompCont.html>

Este, D. (2007). Cultural competency and social work practice in Canada: A retrospective examination. *Canadian Social Work Review* (24)1, 93-105.

Este, D. (2008). *Racism and violence – in Canada, EH? Connecting the Dots*. Faculty of Social Work, the University of Calgary, winter 2008, 5-6.

Georgetown University Center for Child and Human Development (2006). *Cultural competence; definition and conceptual framework*. Retrieved March 20, 2008 from <http://www11.georgetown.edu/research/gucchd/nccc/foundations/frameworks.html>

Geron, S. M. (2002). Cultural competency: How is it measured? Does it make a difference? *Generations, Fall 2002*.

Merriam-Webster Online (2008). *Mentor*. Merriam-Webster Online. Retrieved May 10, 2008 from <http://www.merriam-webster.com/dictionary/mentor>.

Merriam-Webster Online (2008). *Model*. Merriam-Webster Online. Retrieved May 10, 2008 from <http://www.merriam-webster.com/dictionary/model>.

Pendakur, K. (2005). *Visible minorities in Canada's workplaces: A perspective on the 2017 projection. Serving Canada's Multicultural Population for the Future*. Policy Forum. Discussion Papers, 9-16.

Sankey, D. (2008, March 1). Employers embrace diversity. *Calgary Herald*, p. H1.

Sefa Dei, G. J. (2007). *Foreword*. In P. R. Carr & D. E. Lund (Eds.), *The great white north? Exploring whiteness, privilege, and identity in education* (pp. vii –xii). Rotterdam: Sense Publishers.

The Calgary Foundation (2008). *Vital impact: Stories of community in action*. Retrieved May 5, 2008 from <http://www.calgaryvitalsigns.ca/documents/VitalImpact2008final.pdf>

The City of Calgary (2006, May 16). *Coalition of municipalities against racism*. Retrieved April 22, 2008 from http://www.calgary.ca/portal/server.pt/gateway/PTARGS_0_0_104_0_0_35/http%3B/content.calgary.ca/CCA/City+Hall/Municipal+Government/Office+of+the+Aldermen/Ward+Offices/Ward+9/Speeches/Archive+2006/Coalition+of+Municipalities+Against+Racism.htm

University of Calgary (2008a). *Multiculturalism can't exist in Canada: Free public forum addresses multicultural policies*. Taboo Topics; Media Advisory. Retrieved April 22, 2008 from <http://www.ucalgary.ca/news/april2008/tabootopics>

University of Calgary (2008b). *InfoServe 5*. Retrieved April 22, 2008 from <http://www.ucalgary.ca/InfoServe/Vol9.6/nov2002-p2.pdf>

Virginia Commonwealth University Institute for African-American Mental Health Training and Research (2008). *Excellence in cultural competence training and education: A compendium of best practices*. Retrieved March 12, 2008 from http://www.has.vcu.edu/psychology/iam/compendium_intro.htm

Van Ngo, H. (2000). *Cultural competency: A self-assessment guide for human service organizations*. Canadian Heritage.

Van Ngo, H. (2008). *Cultural Competence: A guide to organizational change*. Work-in-progress. Sponsored by the Alberta District of the Department of Canadian Heritage and the Alberta Human Rights, Citizenship and Multiculturalism Education Fund.

Williams, C.C. (2006). The epistemology of cultural competence: Families in Society. *Journal of Contemporary Social Sciences (87) 2*, 209-220.

Wilson, T. (1997). *Diversity at work: The business case for equity*. Toronto: John Wiley & Sons.

Winston, I. (2008, March 1). Top employers of immigrants named. *Calgary Herald*, p. H3.

8.0 Appendices

Appendix A



CERTIFICATION OF INSTITUTIONAL ETHICS REVIEW

This is to certify that the Conjoint Faculties Research Ethics Board at the University of Calgary has examined the following research proposal and found the proposed research involving human subjects to be in accordance with University of Calgary Guidelines and the Tri-Council Policy Statement on "*Ethical Conduct in Research Using Human Subjects*". This form and accompanying letter constitute the Certification of Institutional Ethics Review.

File no: **5365**
Applicant(s): **Urmil Chugh**
Jennifer A. Hewson
Department: **Social Work, Faculty of**
Project Title: **Exploring Expanding Community Cultural Competency Needs and Possibilities**
Sponsor (if applicable): **CCIS**

Restrictions:

This Certification is subject to the following conditions:

1. Approval is granted only for the project and purposes described in the application.
2. Any modifications to the authorized protocol must be submitted to the Chair, Conjoint Faculties Research Ethics Board for approval.
3. A progress report must be submitted 12 months from the date of this Certification, and should provide the expected completion date for the project.
4. Written notification must be sent to the Board when the project is complete or terminated.

Janice Dickin, Ph.D, LL.B,
Chair
Conjoint Faculties Research Ethics Board

13 December 2007
Date:

Distribution: (1) Applicant, (2) Supervisor (if applicable), (3) Chair, Department/Faculty Research Ethics Committee, (4) Sponsor, (5) Conjoint Faculties Research Ethics Board (6) Research Services.

Appendix B

Telephone Script for Recruiting Primary Participants

Hello my name is [Interviewer's Name] and I am calling from The Centre for Social Work Research and Professional Development at The Faculty Social Work at University of Calgary. I am conducting a research project on behalf of Calgary Catholic Immigration Society to map existing services and programs in Calgary that support cultural competency within the organization as well as community development. Your organization has been identified as one of the organizations involved in cultural competency. I would like to invite you to participate in a face-to-face interview (approximately half an hour) at a time and place convenient to you. Can we set up a time?

If no, thank you, goodbye. Can you identify someone else in your organization who would be suitable. If yes, the interviewer would declare: Your name would be disclosed to the secondary contact, i.e., the person whose name you are providing. In case of hesitation the interviewer would not contact the potential secondary contact and will make this point clear to the primary contact.

If yes, [determine date/time and place] for your convenience I will e-mail you the questionnaire and the consent form for your review prior to our meeting. At the time of the interview, I will present an informed consent form for you and me to sign. With your consent I would audio-tape the interview.

[record response]

Thank you very much for your time. Goodbye.

Appendix C

Telephone Script for Recruiting Secondary Participants

Hello my name is [Interviewer's Name] and I am calling from The Centre for Social Work Research and Professional Development at The Faculty Social Work at University of Calgary. I am conducting a research project on behalf of Calgary Catholic Immigration Society to map existing services and programs in Calgary that support cultural competency within the organization as well as community development. Your organization has been identified as one of the organizations involved in cultural competency. Your name and telephone number were given to the research team by [name the primary contact] as a suitable informant on behalf of your organization. I would like to invite you to participate in a face-to-face interview (approximately half an hour) at a time and place convenient to you. Can we set up a time?

If no, thank you, goodbye. Can you identify someone else in your organization who would be suitable.

If yes, [determine date/time and place] for your convenience I will e-mail you the questionnaire and the consent form for your review prior to our meeting. At the time of the interview, I will present an informed consent form for you and me to sign. With your consent I would audio-tape the interview.

[record response]

Thank you very much for your time. Goodbye.

Appendix D

Organizational Cultural Competency Questionnaire

²⁵Name of the organization _____

Name of the interviewee _____

1. In the past five years, has your organization assessed its own cultural competency?

Yes

No

1a. If yes, please briefly describe the procedure followed.

1b. If yes, what did the assessment say about your organization's overall cultural competence?

1c. If no, please provide reasons for not doing it.

²⁵ Note the data collected is not anonymous.

2. Please rate the following items on a five-point agreement scale?
Please circle your response. If the item does not apply to your organization please check "not applicable."

- My organization is cognizant of the cultural diversity in Calgary.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Not applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- My organization regularly utilizes the expertise of culturally diverse groups in setting culturally sensitive hiring policies.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Not applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- My organization allocates adequate resources to implement culturally competent policy.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Not applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- My organization regularly utilizes the cultural expertise of culturally diverse groups in delivering culturally relevant services.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Not applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- The Executive Director of my organization leads in creating an environment that is respectful to all employees.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Not applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- The Executive Director of my organization leads in creating an environment that is respectful to all clients.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Not applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- The board of directors ensures that its members represent relevant culturally diverse groups.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Not applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- My organization set aside staff time for cultural competency training/awareness.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Not applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- My organization's mission statement refers to services for culturally diverse people.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Not applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- The operational procedures/guidelines mandate that the organization has a clear statement addressing culturally biased language, behaviours or practices.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Not applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- My organization collects, maintains and analyzes culturally specific data.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Not applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- My organization reviews research pertaining to the experience of culturally diverse populations in service area the organization is involved in.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Not applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- My organization regularly evaluates impacts of its programs/projects on culturally diverse clients.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Not applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3. How does your organization provide culturally competent training? (Check all that apply.)

- External consultants
- Internally (e.g., staff, human resources specialist, etc.)
- Other (please specify) _____

4. How does your organization model itself as a culturally competent organization within the community?

5. How does your organization mentor other organizations to become culturally competent organizations?

External Consultants

6a. If the external consultants were hired, please provide:

Consultants' names _____

Topics covered _____

6b. Please comment on the outcomes of the activities covered by the external consultants.

6c. Would you recommend the external consultants to other organizations? (Check only one.)

- Yes
- No
- Undecided

Provide reasons for your response _____

Internal Training

7a. If the cultural competence training, modeling or mentoring was provided internally please provide topics.

7b. Have your internal providers (in 7a) provided culturally competence training, modeling, and mentoring to other organizations?

- Yes
- No
- Don't Know

Provide reasons for your response _____

8. Additional Comments
