

 Behavioral Health Department Alameda County Health	Signed by:  By: <u>BA167CA0C0D444A...</u> Karyn L. Tribble, PsyD, LCSW, Director
POLICY TITLE Cultural Humility, Equity and Inclusion Framework, and Implementation of CLAS Standards	Policy No: 1602-1-2 Date of Original Approval: 9/11/2026 Date(s) of Revision(s):

PURPOSE

Alameda County Behavioral Health Department (ACBHD) is committed to providing effective and equitable behavioral health care services that are responsive to individuals' culture (e.g., race, gender identity, sexual orientation, age, class, nationality, language, and ability). ACBHD strives to move towards becoming a trauma-informed/trauma healing organization in partnership with team members, communities, and contractors/partners. ACBHD is committed to ensuring that every policy or procedure, developed and implemented, leads with an equity lens.

The purpose of this policy is to designate cultural and linguistic humility as a defining quality and standard to be embedded in all aspects of the work performed at ACBHD. As such, it shall respond effectively to the needs and differences of all individuals based on their race, gender, age, physical or mental status, sexual orientation, and ethnic or cultural heritage. ACBHD shall establish a system-wide environment of support, training, and education related to cultural humility to assist the behavioral health workforce in advancing its capacity to meet the needs of Alameda County's diverse populations.

AUTHORITY

- [ACBHD Policy 300-7, Effective Communication, Including Alternative Formats, for Individuals with Disabilities](#)
- [ACBHD Policy 100-2-2, 24/7 Language Assistance to Members](#)
- [Department of Health Care Services \(DHCS\) Behavioral Health Information Notice \(BHIN\) No. 25-019, Transgender, Gender Diverse, or Intersex Cultural Competency Training Program Requirements](#)
- [ACBHD Policy 1602-1-1 Integration of Spiritual Interests In Recovery and Wellness](#)
- [ACBHD Exhibit A-1, Standard Requirements for Mental Health and Substance Use Disorder \(SUD\) Contracts](#)
- [ACBHD Cultural Competency Plan 2024](#)

SCOPE

All ACBHD County-Operated programs and entities, in addition to individuals providing specialty mental health services (SMHS) and substance use disorder (SUD) services under a contract or subcontract with ACBHD, are required to adhere to this policy.

BACKGROUND

ACBHD is committed to valuing the perspectives and cultures of diverse teams, consumers, peers, families, and community members. This commitment is reflected in the ACBHD Vision, Mission, Values, and most meaningfully in the policies, procedures, activities, and programs implemented by ACBHD.

POLICY

[The National Standards for Culturally and Linguistically Appropriate Services \(CLAS\)](#) guides ACBHD in creating integrated and culturally responsive behavioral health services. ACBHD demonstrates its commitment to cultural responsiveness in the State-mandated Cultural Competence Plan (CCP). In accordance with California's mandate, each county is required to establish a Cultural Responsiveness Committee and designate a point of contact — the Ethnic Services Manager/Administrator — to ensure compliance with this requirement. The CCP, which is drafted by the Health Equity Division (HED), utilizes input from the Cultural Responsiveness Committee and cultural and ethnic advisory committee members (i.e., African American, Asian American Native Hawaiian and Pacific Islander (AANHPI), Latinx, Native American and Pride. The Ethnic Services Team plays a key role in facilitating this collaboration and ensuring the mandate is met at the county level. The inclusion of diverse voices has led transformation efforts, resulting in a trauma-informed system of care and the enactment of supporting policies and procedures.

PROCEDURE

A. Organizational Accountability

1. ACBHD shall model and promote cultural humility as an active part of its organizational culture and will develop and/or provide the necessary professional development training to staff in these areas, including state-mandatory CLAS and other relevant trainings.
2. In addition to the Cultural Responsiveness Committee, the ACBHD Office of Ethnic Services (OES) shall oversee cultural and ethnic advisory committees in response to disparities and gaps in behavioral health services, including the African American Advisory Committee, the Asian American Native Hawaiian Pacific Islander Advisory Committee, the Latino/Latinx Advisory Committee, the Pride Advisory Committee and the Native American Advisory Committee.
3. All contracting entities providing behavioral health care and services will carry out their duties in a manner that embraces cultural humility and reflects the diverse populations of Alameda County and staff in the workplace.
4. Per [ACBHD's Exhibit A-1 Standard Requirements for Mental Health and SUD Contracts](#), "To ensure equal access to quality care by diverse populations, Contractor shall adopt the Federal Office of Minority Health Culturally and Linguistically Appropriate Service (CLAS) national standards as outlined online at [Think Cultural Health](#). Contractor shall have, implement, and monitor a plan to enhance implementation of CLAS Standards throughout its organization, and shall work with ACBHD and other partners to enhance

service utilization for different populations including but not limited to American Indians/Alaskan Natives and other priority populations.

B. Measures and Practices

In accordance with ACBHD Policy 100-2-2, 24/7 Language Assistance to Members, the overarching principles of the Language Access Ordinance, and applicable Federal and State agreements, this policy affirms that ACBHD will adhere to the following measures and practices:

1. ACBHD will provide equal access to all non-English speaking behavioral health members in the County of Alameda.
2. ACBHD aims to recruit and hire behavioral health professionals who are proficient in non-English languages.
3. All Limited English Proficiency (LEP) members seeking services at ACBHD facilities will be offered access to the services of a qualified oral interpreter **at no cost to them**.
4. ACBHD will maintain sufficient interpreter resources and provide these services to contractors who are unable or do not have capacity to provide language interpretation services in a timely manner. As a first preference, qualified bilingual staff who can communicate directly with members/consumers in their preferred languages will be made available. When such staff are not available, face-to-face interpretation provided by contracted vendors or volunteer interpreters is the next preference. A telephone interpreter will be used as a supplemental system when an interpreter is needed immediately or when services are needed in an infrequently encountered language.
 - a. Under no circumstances shall a member be denied services because of a language barrier.
5. The commitments outlined in previous items 2-4 apply to both civil service programs AND contracted community-based organizations (CBOs) who do not have the capacity to provide language interpretation. The procedure for accessing interpretation services, whether on demand or in advance for a scheduled appointment/event, is outlined in ACBHD Policy 100-2-2, 24/7 Language Assistance to Members.
6. Staff who are designated as bilingual and able to provide their standard level of services to members will be qualified, based on their performance on a test issued by Alameda County Human Resources. Internal recruitment and placement of interpreters will be based on resource availability or qualified interpreters.
7. Family, friends, or other individuals will not be required, suggested, or used as interpreters unless the member chooses to use them as such. Only after being informed of the availability of free interpreter services and determining that the effectiveness of those services is not compromised or the LEP person's confidentiality is not being violated, may a family member or friend be used.

C. Hearing Impaired Behavioral Health Access

In accordance with applicable Federal, State and county policies and agreements, ACBHD shall provide equal access to services for members with behavioral health issues and hearing impairment at all Alameda County directly operated and contract service programs.

1. More information on addressing the needs of those with hearing and other physical impairments can be found in the [ACBHD Policy 300-7, Effective Communication, Including Alternative Formats, for Individuals with Disabilities](#).
2. Upon request, American Sign Language (ASL) interpretation services will be available and offered to members with hearing impairments at no cost to them.
3. Refer to [ACBHD Policy 100-2-2, 24/7 Language Assistance to Members](#) for more information.

D. Diversity Leadership and Employees

1. ACBHD will build a workforce designed to address the cultural and linguistic needs of Alameda County residents and provide appropriate and effective services as required by Federal, State, and city and county laws, regulations, and policies. ACBHD will promote a system of recruitment and retention of qualified staff from diverse backgrounds who understand their members' cultures and communities to provide better service to the community.
 - a. Per [ACBHD's Exhibit A-1 Standard Requirements for Mental Health and SUD Contracts](#), Contractor shall maintain staff with professional experience and expertise in providing evidence-based, culturally, and linguistically appropriate services, particularly for any designated priority populations that Contractor has agreed to serve.

E. Cultural and Linguistic Humility and Culturally and Linguistically Appropriate Services (CLAS) Trainings

1. ACBHD will provide the necessary tools, skills, and knowledge to support, improve, and evaluate practices reflecting cultural humility. This includes creating a workplace environment that empowers staff to work comfortably and effectively across the cultural and linguistic boundaries presented by members and with other ACBHD staff, interns, and volunteers.
2. ACBHD will develop and provide training opportunities on cultural and linguistic humility for all staff, interns, volunteers and senior management, as well as clinicians and providers and other contracted and affiliated personnel. These trainings will include the linkage between cultural and linguistic care and improved health access, legal requirements and policies, including the ACBHD policies and procedures, quality of care issues, and the importance of using qualified interpreters. OES and the Workforce Education Training (WET) Unit have and continue to build training opportunities, such as in-person and online training in real-time.
 - a. All direct service staff and managers within the Contractor's organization who are providing or supporting services shall complete at least four (4) CLAS trainings

annually. At least two (2) of the CLAS trainings shall be offered through ACBHD and shall be attended by at least two (2) staff from the Contractor's organization, one (1) of which shall be a manager. Contractor shall have, implement and monitor a plan to enhance implementation of CLAS Standards throughout its organization.

Contractor shall conduct the following activities to provide associated information to the ACBHD OES by July 10th of the following fiscal year:

- i. Complete an electronic survey that demonstrates Contractor's implementation of CLAS Standards;
- ii. Submit a list of CLAS trainings attended by staff and managers who are providing or supporting services.
- iii. Submit a summary or copy of the plan to further implement CLAS Standards throughout the organization.
- iv. All staff who are in direct contact with members whether oral, written, or otherwise in the delivery of care or member services, including staff working in county owned and operated facilities will need to complete evidence-based cultural competency training for the purpose of providing trans-inclusive health care for individuals who identify as TGI.

CONTACT

ACBHD Office	Current As Of	Email
Health Equity Policy and Systems Unit, HED	5/7/26	HEPS@acgov.org

DISTRIBUTION

This policy will be distributed to the following:

- ACBHD Staff
- ACBHD Contract Providers
- Public

ISSUANCE AND REVISION HISTORY

Original Authors: Mona Shah, Health Equity Policy and Systems Manager, Health Equity Policy and Systems Unit, HED; Joanna Saeteurn, Health Equity Policy and Systems Program Specialist, Health Equity Policy and Systems Unit, HED

Original Date of Approval: 9/11/2026 by Dr. Karyn Tribble, Behavioral Health Director

Revision Author	Reason for Revision	Date of Approval by (Name, Title)

DEFINITIONS

Term	Definition
CLAS Standards	Federal Office of Minority Health Culturally and Linguistically Appropriate Service (CLAS) national standards as outlined online at Think Cultural Health (U.S. Department of Health & Human Services, Office of Minority Health).
Cultural Humility	Cultural Humility is a philosophy that goes beyond striving for cultural competence. It is engaging in a lifelong commitment of self-evaluation and self-inventory, establishing a respectful relationship with others through an attitude of openness and curiosity.
Equity	Norms, values and structures reflect the contribution of diverse cultural and social groups and are free of bias, discrimination and social divisions.
Inclusion	Organizational culture and daily practices that value, encourage, affirm and support the participation of diverse social and cultural representation, experiences, perspectives, and ways of thinking and communicating at all levels of the organization.

APPENDICES

None