

POLICY AND PROCEDURE	
SUBJECT/TITLE:	Non-Discrimination and Provision of Culturally and Linguistically Appropriate Services Policy
APPLICABILITY:	All Staff Providing Direct Services to Clients
CONTACT PERSON & DIVISION:	Health Commissioner, Administration
ORIGINAL DATE ADOPTED:	07/18/2018
LATEST EFFECTIVE DATE:	07/18/2018
REVIEW FREQUENCY:	Every 3 years
BOARD APPROVAL DATE:	N/A
REFERENCE NUMBER:	800-021-P

A. PURPOSE

Canton City Public Health is committed to developing and maintaining health services that are culturally competent, consumer-guided and community-based. Cultural competence is an essential requirement for health care providers to provide effective services to our diverse populations.

B. POLICY

Canton City Public Health shall use the National Cultural and Linguistic Standards (CLAS) as the general guidelines for the provision of culturally and linguistically appropriate services.

Canton City Public Health shall not discriminate in the provision of any of its services on the basis of race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, marital status, family/parental status, or age.

Canton City Public Health shall assure the provision of health services that are culturally and linguistically competent, consumer-guided and community-based.

Every person or organization applying for a direct services contract with Canton City Public Health shall demonstrate an ability to deliver the services in a culturally and linguistically competent manner.

The Health Commissioner is responsible for monitoring compliance with this policy.

C. BACKGROUND

The National CLAS Standards are a set of 15 action steps intended to advance health equity, improve quality and help eliminate health care disparities by providing a blueprint for individuals and health and health care organizations to implement culturally and linguistically appropriate services.

These standards and accompanying supporting information can be found on the web at [Think Cultural Health](https://www.thinkculturalhealth.hhs.gov/clas). (https://www.thinkculturalhealth.hhs.gov/clas)

D. GLOSSARY OF TERMS

Cultural and linguistic competence - A set of congruent behaviors, attitudes, and policies that come together in a system, agency, or among professionals that enables effective work in cross-cultural situations. `Culture' refers to integrated patterns of human behavior that include the language, thoughts, communications, actions, customs, beliefs, values and institutions of racial, ethnic, religious or social groups. `Competence' implies having the capacity to function effectively as an individual and an organization within the context of the cultural beliefs, behaviors and needs presented by consumers and their communities.

Direct services - Any programs or services funded by the Department, including program design, evaluation, outreach and media that are provided directly to the public or a specific population.

Indirect services - Programs or services that are provided directly to the Department, such as the provision of materials and supplies, accounting or fiscal services and other administrative support for direct services.

E. PROCEDURES & STANDARD OPERATING GUIDELINES

1. Canton City Public Health has adopted this policy that specifies how a client may: 1) request a reasonable accommodation for the receipt of services, 2) procedure for requesting interpretation services (including American Sign Language) and 3) who to contact if the client has a question or issue.
 - a. Canton City Public Health shall make available to clients copies of this non-discrimination policy. In addition, this policy shall be posted in an area visible to clients or at the point of service.
 - b. Canton City Public Health shall make available to clients, procedures for requesting reasonable accommodation in the receipt of services. In addition, the policy shall be posted in an area visible to clients or at the point of service.
 - c. Canton City Public Health shall make available to clients, procedures for requesting interpretation services, including American Sign Language, in the receipt of services. In addition, the policy shall be posted in an area visible to clients or at the point of service.
 - d. These policies and procedures shall be available in languages and formats (e.g. for persons with disabilities) appropriate to the populations being served.
2. The Health Commissioner shall direct a Cultural Competency Committee (a standing staff committee) to complete an annual assessment of the department's compliance with the CLAS standards. A copy of this assessment with recommendations shall be provided to the Board of Health once each calendar year.
3. The following statement, or similar, shall be included in each contract or agreement for services between Canton City Public Health and an organization providing services on behalf of Canton City Public Health:

“[Name of Vendor] does not discriminate in the provision of any of its services on the basis of race, color, national origin, sex, disability, or age. [Name of Vendor] further stipulates that it is committed to providing services that are culturally and linguistically appropriate for its clients.”
4. Complaints:
 - a. If any person feels that services provided are not in compliance with this policy, they may direct their concern to the Health Commissioner for investigation and resolution. Upon receipt of any complaint, the Health Commissioner shall promptly investigate such complaint and may employ any reasonable means to assist in the investigation, including the use of outside legal counsel. All complaints and investigations shall be reported to the Board of Health.

F. CITATIONS & REFERENCES

Federal Register: [78FR58539](#), National Standards for Culturally and Linguistically Appropriate Standards (CLAS) in Health and Health Care. Final enhance Standards effective September 24, 2013.

Website: [Think Cultural Health](https://www.thinkculturalhealth.hhs.gov/clas) [<https://www.thinkculturalhealth.hhs.gov/clas>]. A link to the CLAS standards and supporting documentation.

Section 205.10 Canton City Health Code – Non-Discrimination and Provision of Culturally and Linguistically Appropriate Services.

G. CONTRIBUTORS

The following staff contributed to the authorship of this document:

1. James Adams, Health Commissioner

H. APPENDICES & ATTACHMENTS

I. REFERENCE FORMS

Include a list of forms needed for this policy/procedure. If none, list as N/A.

J. REVISION & REVIEW HISTORY

Revision Date	Review Date	Author	Notes

K. APPROVAL

This document has been approved in accordance with the “800-001-P Standards for Writing and Approving PPSOGFs” procedure as of the effective date listed above.