



**Health Care Agency
Behavioral Health Services
Policies and Procedures**

Section Name: Human Resources
Sub Section: Staff Development
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SIGNATURE

DATE APPROVED

Deputy Director
Behavioral Health Services

Signature on file

08/19/2026

SUBJECT:

Transgender, Gender Diverse, and Intersex (TGI) Cultural Competency
Training and Reporting

PURPOSE:

To establish training and reporting requirements for the Orange County Behavioral Health Plan (BHP) in order to provide transgender-inclusive (trans-inclusive) health care to Medi-Cal members.

POLICY:

The Orange County BHP requires that all Behavioral Health Services (BHS) personnel and contracted organizations' staff who are in direct contact with Medi-Cal members complete an evidence-based cultural competency training for the purpose of providing trans-inclusive health care for individuals who identify as transgender, gender diverse, or TGI.

SCOPE:

This policy applies to all BHS employees and all contractor employees who have direct contact with Medi-Cal members.

REFERENCES:

[BHIN 25-019 Transgender, Gender Diverse, or Intersex Cultural Competency Training Program Requirements](#)

[Welfare & Institutions Code §14197.09](#)

DEFINITIONS:

Trans-Inclusive Health Care – Comprehensive care that honors personal bodily autonomy, avoids assumptions about gender, accepts gender diversity and fluidity, and treats all individuals with dignity compassion, and respect.

Direct Contact with Members – Any oral, written, electronic, or in-person interaction related to the delivery or administration of behavioral health services.

Behavioral Health Plan (BHP) – Includes Health Care Agency (HCA)-BHS county-operated programs and contracted providers delivering Specialty Mental Health Services (SMHS) and/or Drug Medi-Cal Organized Delivery System (DMC-ODS) services.

Evidence-Based Training – training and assessment method grounded in and supported by research demonstrating its success.

PROCEDURE:

I. Training Frequency and Timelines

- A. Employees must complete initial training within 45 days of hire.
- B. After initial training, ongoing training must be completed once every two years
- C. A refresher training is required within 45 days when a grievance related to failure to provide trans-inclusive care is resolved in the member's favor. The provider must not have any direct contact with members and deliver any Medi-Cal covered services until the refresher training is complete.

II. Curriculum Standards and Submission Requirements

- A. TGI training shall be evidence-based and research grounded.
- B. The BHP shall collaborate with a TGI-serving organization to develop and facilitate the training;
 - 1. The training shall include all of the elements set forth in W&I Code Section 14197.09(a)(2).
 - 2. The training shall be made available to all BHP providers, including contracted providers
- C. The BHP shall provide to the Department of Health Care Services (DHCS) a signed and dated attestation every two years on BHP letterhead declaring that all BHP staff, subcontractors, and downstream subcontractors in direct contact with members have completed evidence-based cultural competency.
 - 1. The BHP's attestation shall include confirmation that all staff have completed TGI training within 45 days of being hired and every two years thereafter.

III. Grievance Monitoring and Reporting Requirements

- A. The BHP shall ensure that members are made aware of all their grievance and appeal rights including their right to submit grievances to the BHP for failure to provide trans-inclusive health care as defined in W&I sections 14197.09(d)(5)

- B. The BHP shall track and report to DHCS when a grievance is made against a named individual(s) of the BHP or its subcontractors, downstream subcontractors or staff for failure to provide trans-inclusive care.
- C. If a grievance is decided in the member's favor, the applicable individual(s) must complete the trans-inclusive health care cultural competency training again within 45 days from the grievance resolution and before having direct contact with members. The provider must not have any direct contact with members and deliver any Medi-Cal covered services until the refresher training is complete.
 - 1. The BHP shall report the grievance to DHCS quarterly; this report shall be used by DHCS to publicly report all gender-affirming care related grievances against BHP staff, subcontractors and downstream subcontractors on the DHCS reporting form as required by W&I Section 14197.09(b)(2).
 - 2. The report is on a templated reporting form provided by DHCS and it shall include, but is not limited to the following:
 - a) Total number of grievances filed for failure to provide trans-inclusive health care as defined within this BHIN
 - b) Total number of grievances resolved in the member's favor
 - c) Date the grievance was received
 - d) Name of the individual, position title, affiliation with the BHP
 - e) Completion date of the refresher training; and
 - f) Any additional actions taken by the BHP to prevent future complaints.
 - 3. Any pattern of repeated complaints against an individual or multiple complaints against multiple individuals will require further remediation, including, but not limited to staff training, staff discipline, and/or re-evaluation of the training curriculum.
- D. Reports shall be submitted no later than 10 days after the end of the quarterly reporting period as determined by DHCS.