

The third draft of the Commission's prevention and early intervention (PEI) report, *Well and Thriving*, and the accompanying first public draft of the PEI Implementation Plan make for very interesting, though very disappointing, reading. In spite of its suggested whole population approach and the need for cultural understanding, there is still an over emphasis on evidence-based practices. The literature is replete with evidence of the failure and/or inability of EBPs to address the needs of the African American community. It is also important to point out that the PEI Implementation Plan is based essentially of Western psychological principles that have been shown to be incapable of reducing mental health disparities in the Black community. All this is done in spite of the APA's apology admitting that "it (APA) failed in its role leading the discipline of psychology, was **complicit** in contributing to **systematic inequities, and hurt** many through racism, racial discrimination, and denigration of people of color, thereby falling short on its mission to benefit society and improve lives". If the State continues to use incorrect and inaccurate theories, concepts, and strategies to build its prevention plan, then it will continue to promote disparities, stigma and increasing mental health issues in the Black population. It will, in fact, knowingly join with the agents of harm and hurt resulting from perpetrating systems that denigrate and demean people of color, especially Black people.

In spite of the Association of Black Psychologists over fifty (50) years of developing and testing theories, concepts, programs and practices for providing services to the African American community, the draft report, *Well and Thriving*, provides little or no utilization of this information in its report or in the PEI implementation plan. As documented in the CRDP Black Population Report, the Black population is dealing with a "crazy" system that continues to do the same thing over and over and expecting a different result. That, according to Einstein, is the definition of insanity. The state cannot continue to do the same thing, build programs and practices based on hurtful, incorrect, and incomplete information and expect to change the outcomes.

Effective PEI efforts should be required to demonstrate "how they have disengaged and/or disentangled their programmatic philosophy and practice from Euro-American psychology and beliefs" and "what are the measurable and verifiable evidence and examples that demonstrate their intentional critique, clarification, and correction of the explicit and/or implicit usage of Euro-American parochial, thoughts, beliefs, values, customs, traditions, practices, and policies in their service delivery". PEI efforts must be based on programs, practices and services that are based on the cultural orientation and value system of the target population.

The National Association of Black Psychologists and its Bay Area chapter have a long history of designing and developing prevention, treatment programs and services that have gone unrecognized by the Mental Health Services Oversight & Accountability Commission. This is the ultimate indicator of APA type complicity to systematic inequities and hurt contributing to racial discrimination and denigration of people of color. This legacy of disrespect and denial cannot continue to persist.

The Bay Area Chapter of the Association of Black Psychologists has a community-defined program, The Therapist in Residency Program, that has been vetted in a pilot program founded by a local foundation, The Therapist in Residency Program not only demonstrates culturally congruent services and training, but it also directly addresses the shortage of Black mental health providers in Alameda County. Secondly members of the Bay Area chapter have researched and designed a major African American Wholistic Wellness HUB Complex that will provide wellness programs and activities for the African American community in Alameda County. An interim virtual Hub complex is being supported by Alameda County Behavioral Health Care Services and is an excellent example of the collaboration between a local non-profit and a county agency that is using the theories, concepts, ideas, and practices that have been developed by the Association of Black Psychologists based on Black Psychology. This effort can, and should, be replicated in counties with significant Black populations throughout the state. In this way the state can begin the disengagement on its reliance on APA sanctioned and promoted theories and practices and begin to utilize culturally grounded programs in its PEI efforts.

The Bay Area Chapter of Association of Black Psychologists offers a definition of health and wellness for African people that states “When the human spirit is well, whole, and healthy, being human is experienced and characterized by confidence, competence and a sense of full possibility and unlimited potentiality.” We welcome the opportunity to partner with the Mental Health Services Oversight & Accountability Commission and to provide needed culturally congruent (African centered) prevention and early intervention consultative collaboration with you. It is our hope that you will contact The Bay Area Chapter leadership with proposed steps for our jointly going forward.

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