



CDSS

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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**

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ARNOLD SCHWARZENEGGER  
GOVERNOR

October 8, 2009

Ms. Christine Applegate  
Stanislaus County Community Services Agency  
P.O. Box 42,  
Modesto, CA 95353-0042  
ADDRESS

Dear Ms. Applegate:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of August 2008. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a corrective action plan (CAP). Please submit your CAP within sixty days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it too, becomes a public document. Per the Governor's Executive Order S-08-09, all compliance reviews (and corresponding CAPs) performed after January 2008 will be posted on the state's Reporting Government Transparency website.

If you need technical assistance in the development of your CAP, please feel free to contact the Civil Rights Bureau at (916) 654-2107 (voice) / (916) 654-2098 (TDD). You may also contact us by e-mail at [crb@dss.ca.gov](mailto:crb@dss.ca.gov).

Sincerely,

RAMÓN S. LOPEZ, Chief  
Civil Rights Bureau  
Human Rights and Community Services Division

Enclosure

c: Elizabeth Beck, Civil Rights Coordinator

Chris Webb-Curtis, Branch Chief, CDSS Supplemental Nutrition Assistance Program  
M.S. 8-9-32

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Food Stamps Policy Bureau M.S. 8-9-32

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR  
STANISLAUS COUNTY COMMUNITY SERVICES AGENCY  
Conducted October 2009**

**California Department of Social Services  
Human Rights and Community Services Division**

**Civil Rights Bureau**

**744 P Street, M.S. 8-16-70**

**Sacramento, CA 95814**

**(916) 654-2107**

**Reviewer**

**Daniel Cervantes**

## TABLE OF CONTENTS

- I. INTRODUCTION
- II. SUMMARY OF METHODOLOGY
- III. DISSEMINATION OF INFORMATION
- IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES
- V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES
- VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS
- VII. STAFF DEVELOPMENT AND TRAINING
- VIII. DISCRIMINATION COMPLAINT PROCEDURES
- IX. CONCLUSION

## CIVIL RIGHTS COMPLIANCE REVIEW REPORT

### I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Stanislaus County Community Services Agency with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted in August, 2008, and re-reviewed in October, 2009. An exit interview was held in August with Stanislaus County staff on August 14, 2008 to review the findings.

The review was conducted in the following locations:

<b>Name of Facility</b>	<b>Address</b>	<b>Programs</b>	<b>Non-English languages spoken by a substantial number of clients (5% or more)</b>
Main Office (Modesto)	251 E. Hacket Road, Modesto	Adult Programs (IHSS & APS), Non-Assistance Food Stamps, StanWORKS, Welfare-to-Work and Children's Services (Family Maintenance & Family Reunification)	Spanish
CSA, Turlock	101 Lander Ave	StanWORKS, Welfare-to-Work	Spanish
West Modesto	401E Paradise Road Building 4	Non-Assistance Food Stamps	Spanish

### II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2008 Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

<b>Classifications</b>	<b>Total</b>	<b>Bilingual</b>
Eligibility Workers	5	2
Children Social Workers	3	1
Adult Program Workers	3	1
Receptionist/Screeners	3	3
<b>Total</b>	<b>14</b>	<b>7</b>

An additional xxx interviews were scheduled but were not conducted due to staff unavailability.

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	2
Non-English or limited-English speakers' case files reviewed	45
Languages of clients' cases	English, Spanish

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a declaration of overall compliance.

### III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

#### A. Findings

<b>Access to Services, Information and Outreach</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Although extended hours have been eliminated due to budget concerns, county workers do their best to accommodate clients and their needs. Applications can also be completed on-line.
Does the county have extended hours to accommodate clients?		X		Extended hours have been eliminated due to budget concerns.
Can applicants access services when they cannot go to the office?	X			Clients are able to apply for benefits via the internet at C4yourself.com.
Does the county ensure the awareness of available services for individuals in remote areas?	X			The county does its best to communicate with individuals in

				remote areas through the media, Internet, community outreach, and various hospitals, clinics, and outstations.
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<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some- times</b>	<b>Comments</b>
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)? Is the pamphlet distributed and explained to each client at intake and re-certification?	X  X			
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?		X		There were BOTH updated and outdated versions of the English and Spanish PUB 13 pamphlets in all offices visited. Most of the remaining languages consisted of outdated versions.
Was the Pub 13 available in large print, audiocassette and Braille?	X			
Were the current versions of the required posters present in the lobbies?		X		Modesto's Main Office, 251 E. Hackett, was missing the "Everyone is different, but Equal under the Law" (PUB 86.)
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			All posters need to be updated with current CRC's name and contact information.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-	X			All signage was clearly visible.



Signage, posters, pamphlets	Yes	No	Some-times	Comments
English-speaking clients translated into appropriate languages?				

## B. Corrective Actions

Informational Element	Corrective Action Required
Translated Pub 13	Stanislaus County shall ensure that the current version of the Pub 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language. Div. 21-115.2
Posters	Stanislaus County shall ensure that the most current version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms. Div. 21-107.211

## C. Recommendation

The most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	03/07
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact your program consultant to receive the most recent versions, or download the Pub 13 from the CRB website [http://www.dss.cahwnet.gov/civilrights/YourRights\\_498.htm](http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm).

## IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

### A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

**Facility Location:** 251 E. Hackett Rd.

Facility Element	Findings	Corrective Action
Parking	<p>Freestanding signs all along the center of the parking lot are too low at 76 ½ in – 78 in high.</p> <p>Access aisle for van accessible spaces do not have 8 ft access aisle. (Please see pictures displaying 5 ft access aisle)</p>	<p>Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p 133</p> <p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135            Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p 135</p>
Restroom	<p><b>Men's:</b></p> <p>Wall mounted sign too low at 55 in.</p>	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by</p>

	<p>Pressure to open door excessive at 10 lbs.</p> <p><b>Woman's:</b></p> <p>Wall mounted sign too low at 55 in high.</p> <p>Pressure to open door excessive at 10 lbs.</p>	<p>Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 263</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 195</p> <p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 263</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 195</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 195</p>
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Facility Location: 275 S. 3<sup>rd</sup> Street

Facility Element	Findings	Corrective Action
Parking	<p>Accessible parking spaces too short at 17 ft long.</p> <p>Van accessible parking spaces too short at 17 ft long .</p> <p>Signage on pavement needs to be repainted.</p> <p>The words NO PARKING not painted in access aisle.</p>	<p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 &amp; 2, ADA 4.6.3) p 135</p> <p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p 135</p> <p>Pavement signage shall be 36" x 36" minimum, white on blue in color, visible and centered. (CA T24 1129B.5.1 &amp; 2) p 133</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 &amp; 2) p 135</p>
Restroom	<p><b>Unisex:</b></p> <p>No accessible signage on wall adjacent to latch outside of restroom door.</p>	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24</p>

	<p>Toilet protector too high at 45 in from floor.</p> <p>Paper towel dispenser too high at 50 in from floor.</p> <p>Sanitary Napkins dispenser too high at 55 in from floor.</p> <p>Toilet tissue dispenser too far at 20 in from front edge of toilet seat.</p>	<p>1117B.5.7, ADA 4.30.6) p 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 263</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p 269</p> <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp 275, 269</p> <p>Toilet paper dispenser minimum height from floor is 19". (ADA 4.16.6) pp 275, 269</p>
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**Facility Location:** 401E Paradise Road

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Parking	Freestanding signs too low at 76-78 in high.	Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p 133 Wall signage shall be centered 36" minimum above grade, ground, or sidewalk at the interior end of space. (CA T24 1129B.5) p 133

	<p>Accessible parking spaces too short at 16 ft long.</p> <p>Van Accessible parking spaces too short at 16 ft long.</p>	<p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 &amp; 2, ADA 4.6.3) p 135</p> <p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p 135</p>
Outside signage	No ISA sign at building's main entrance.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp 183, 353
Restroom	<p><b>Men's:</b></p> <p>Pressure to open door excessive at 14 lbs.</p> <p>Toilet tissue dispenser too far at 16 in from front edge of toilet seat.</p>	<p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 195</p> <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp 275, 269</p> <p>Toilet paper dispenser minimum height from floor is 19". (ADA 4.16.6) pp 275, 269</p>

	<p><b>Woman's:</b></p> <p>Pressure to open door excessive at 15 lbs.</p> <p>Toilet tissue dispenser too far at 16 in from front edge of toilet seat.</p>	<p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 195</p> <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp 275, 269</p> <p>Toilet paper dispenser minimum height from floor is 19". (ADA 4.16.6) pp 275, 269</p>
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**B. Recommendation**

N/A

**V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in

individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

**A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews**

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			Language needs are self-identified by the client when filling out the online application. Also, reception staff use resources such as the I SPEAK card to help identify the client's language.
Does the county use a primary language form?		X		
Does the client self-declare on this form?		X		N/A
Are non-English- or limited- English-speaking clients provided bilingual services?	X			
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			Non-English speaking clients (usually Spanish speaking) are assigned bilingual workers.
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			A list of county certified interpreters is available through the human resources department.



Question	Yes	No	Some-times	Comments
Are county interpreters determined to be competent?	X			
Does the county have adequate interpreter services?	X			The county has 272 bilingual workers that fulfill the county's language needs.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		Stanislaus County does not allow the use of minors as interpreters in any situation.
Does the county allow the client to provide his or her own interpreter?	X			
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			
Does the county use the CDSS-translated forms in the clients' primary languages?	X			In the cases reviewed, the forms were sent out in the appropriate language.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides	X			Available upon request. Two of the offices visited still had audio cassettes. CDSS offers audio CDs in various languages upon request.

Question	Yes	No	Some-times	Comments
the Pub 13)?				
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			
Does the county offer screening for learning disabilities?	X			
Is there an established process for offering screening?	X			
Is the client identified as having a learning disability referred for evaluation?	X			

**B. Corrective Actions**

N/A

**C. Recommendation**

N/A

**VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

### A. Findings from Case File Reviews and Staff Interviews

<b>Documented Item</b>	<b>Children's Services</b>	<b>CalWORKs</b>	<b>Non-Assisted Food Stamps</b>
Ethnic origin documentation	CWS-CMS, CAT form, documents in hard case file	SAWS-1, C-IV	SAWS-1, C-IV
Primary language documentation	CWS-CMS, CAT form, documents in hard case file	SAWS-1, C-IV	SAWS-1, C-IV
Method of providing bilingual services and documentation	CWS-CMS	C-IV Narrative	C-IV Narrative
Client provided own interpreter	CWS-CMS	C-IV Narrative	C-IV Narrative
Method to inform client of potential problem using own interpreter	None found	C-IV Narrative	C-IV Narrative
Release of information to Interpreter	None found	None found	None found
Individual's acceptance or refusal of written material offered in primary language	None found	C-IV Case Narrative	C-IV Case Narrative
Documentation of minor used as interpreter	Minors not used	Minors not used	Minors not used
Documentation of circumstances for using minor interpreter temporarily	N/A	N/A	N/A

<b>Documented Item</b>	<b>Children's Services</b>	<b>CalWORKs</b>	<b>Non-Assisted Food Stamps</b>
Translated notice of actions (NOA) contain translated inserts	Letters are sent out in client's language	Spanish inserts in NOAs were properly translated	Spanish inserts in NOAs were properly translated
Method of identifying client's disability	CWS-CMS	C-IV Narrative	C-IV Narrative
Method of documenting a client's request for auxiliary aids and services	CWS-CMS	C-IV Narrative	C-IV Narrative

## **B. Corrective Actions**

<b>Areas of Action</b>	<b>Corrective Action</b>
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24
Documentation of primary language	Each agency shall ensure that case record identification shows the applicant's/recipient's ethnic origin and primary language. Div. 21-201.21

Areas of Action	Corrective Action
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22
General	Stanislaus County must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

### C. Recommendation

The C-IV system used in Stanislaus County that offers workers the opportunity to use a system that offers a more organized format that was not available to workers before. For the most part, employees have taken advantage of this new system. The files of the workers interviewed contained most of the required documentation, but not all. Other counties that have begun using the C-IV system have developed templates that workers MUST fill out that almost guarantees minor details are not overlooked. If Stanislaus could adopt a template that is filled out by the worker at every major contact, that would almost guarantee that the documentation requirement by Division 21 is always met.

## VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

### A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?		X		Many of the staff interviewed said they had only received the training one time.
Do employees understand the county policy regarding a client's rights and procedure	X			County staff are aware that discrimination complaints are to be directed to the CRC.

to file a discrimination complaint?				
Does the county provide employees Cultural Awareness Training?	X			Cultural awareness training is said to be given annually.
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

### B. Corrective Actions

Training Area	Corrective Action
Division 21, Civil Rights Training	Stanislaus County shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1

### C. Recommendation

N/A

### VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

### A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Sometimes	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			
Did the employees know who the Civil Rights Coordinator is?			X	Some employees did not know who the current CRC was.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?		X		Some employees interviewed were not aware that a poster was located in the lobby with the CRC's information.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

### B. Corrective Action

Element	Corrective Action
Discrimination Process	Stanislaus County shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203
Civil Rights Coordinator	Stanislaus County shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Div. 21-117 and 21-107.21

### C. Recommendation

The current version (03/07) of the Everyone is Different, but Equal under the Law poster (PUB86) needs to be displayed in every required lobby. Equally as important is the most current CRC's information. Of the offices visited, two posters has outdated CRC

information.

## **IX. CONCLUSION**

The CDSS found the Stanislaus County Community Service Agency in overall compliance with CDSS Division 21 Regulations, and other applicable state and federal laws with some exceptions. There are a few repeat findings from the 2004 and 2006 review that must be remedied immediately. Stanislaus County is not consistently documenting case files indicating bilingual services were provided (e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter used, etc.), or that the client accepted/refused forms or other written material offered in their primary language. Additionally, Stanislaus County must document a client's need/want to provide their own interpreter. Further, the worker must inform the client of the possibility of ineffective communication if their own interpreter is used. Please see recommendations in Section 6, C.

Stanislaus County must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the violations.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance deficiencies and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.