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DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

January 31, 2011

Ingrid Harita, Director
Orange County Social Services Agency
888 N. Main Street
Santa Ana, CA 92701

Dear Ms. Harita:

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 May 24-28, 2010. Enclosed is the final report on the review. We apologize for the delay.

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 valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. 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. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

JIM TASHIMA, Acting Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Patty Figueredo, Civil Rights Coordinator

Linda Patterson, Branch Chief
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Mike Papin, Chief
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
ORANGE COUNTY SOCIAL SERVICES AGENCY
Conducted on
May 24-28, 2010**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
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Reviewer

**Elsa Garcia
And
Tiffany Marsh**

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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 Orange County Social 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 on May 24-28, 2010. An exit interview was held on May 28, 2010, to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Anaheim Regional Center	3320 E. La Palma Ave, Anaheim	CalWORKs, CalFresh (formerly Food Stamps Programs), Welfare To Work	Spanish, Vietnamese
Eckhoff Main Office	800 N. Eckhoff Street, Orange	Children Family Services, Emergency Response, Family Maintenance	Spanish
East Region	1928 S. Grand Avenue, Santa Ana	CalWORKs, CalFresh, Welfare To Work	Spanish, Vietnamese
Santa Ana Work Center - Train Station	1000 E. Santa Ana Blvd., Santa Ana	CalWORKs, CalFresh, Welfare To Work	Spanish
Central Regional Center	2020 W. Walnut Ave, Santa Ana	CalFresh	Spanish, Vietnamese

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2010-2011 Civil Rights Compliance 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.

- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

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

Classifications	Total	Bilingual
Eligibility Workers	10	7
Children Social Workers	4	2
Employment Workers	3	3
Receptionist/Screeners	5	5
Total	22	17

Program Manager Surveys

Number of surveys distributed	5
Number of surveys received	5

Reviewed Case Files

English speakers' case files reviewed	30
Non-English or limited-English speakers' case files reviewed	270
Languages of clients' cases	Spanish, Vietnamese

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 compliance plan. Required corrective actions are stated at the end of each section.

Section IX reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section X 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

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Applications can be mailed in and completed through the internet for CalFRESH.
Does the county have extended hours to accommodate clients?	X			In Children Family Services social workers work flexible hours to accommodate families. In all other programs business hours are 7:00 a.m. -5:30 p.m., Monday-Friday.
Can applicants access services when they cannot go to the office?	X			Applicants can access services on the website or by telephone. If needed home visits could be arranged.

Does the county ensure the awareness of available services for individuals in remote areas?	X			Awareness is made available via the internet and through community based organizations.
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Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)?	X			All applicants receive the Pub 13 at initial contact.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			A packet with all forms and Pub 13 is given at intake and re-certification.
Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukranian, Vietnamese?	X			
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?	X			
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	X			
Were the current versions of the required posters present in the lobbies?	X			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			
Were there instructional and directional signs posted in waiting				

Signage, posters, pamphlets	Yes	No	Some-times	Comments
areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			

The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	03/07 or 03/10
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact the Civil Rights Bureau to receive the most recent versions, or download the Pub 13 from the CRB website 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.

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

ADAAG.

A. Findings and Corrective Actions

Facility Location: 3320 E. La Palma, Anaheim

Facility Element	Findings	Corrective Action
Parking	<p>No "Minimum Fine \$250" signage below the ISA sign.</p> <p>Van-accessible sign is too low at 79".</p> <p>In the unloading access aisle to the left of entrance the words "NO PARKING" needs to be repainted on pavement.</p>	<p>For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133</p> <p>Each parking space for persons with disabilities shall be identified by a reflectorized sign permanently posted adjacent to and visible from each stall or space, consisting of the International Symbol of Accessibility in white on dark blue background.</p> <p>The sign shall be 70 sp. in. min. and, when in a path of travel, shall be posted at a height of 80" min. from the bottom of the sign to the finished grade. (CA T24 1129B.) (ADA4.6.4) p133</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.3.2) p 135</p>
Water fountain	Fountain does not have either a prescribed mat or wing walls as identified in code.	Protruding objects <u>in alcoves</u> can not project more than 4" into walls, corridors, passageways, or aisles. (CA T24 1117B.1.3) p 232

		<p>If it would create an unreasonable hardship, the water fountain may project into the path of travel under the following conditions:</p> <p>The floor path shall be textured to be identifiable by a blind person using a cane. The minimum textured area shall extend from the wall supporting the water fountain to 12" beyond the front edge of the water fountain and 12" beyond each side of the water fountain., or</p> <p>Wing walls project from the supporting wall at least as far as the water fountain to within 6" of the surface of the path of travel with a min. 32" clearance between the walls." (CA T24 1117B.1.3) pp 232-233</p>
Men's Restroom	<p>Force to open door is excessive at 23 lbs.</p> <p>Soap dispenser is too high at 48".</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 201</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 T24 1115B.8.3, ADA 4.23.7) p 294</p>
Women's Restroom	Wall sign is too high at 68".	Door sign and wall sign shall be 60" above the floor to the

	<p>Force to open door is excessive at 16 lbs.</p> <p>Soap dispenser is too high at 46".</p>	<p>center line of sign.</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 281</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 282</p> <p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 201</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 T24 1115B.8.3, ADA 4.23.7) p 294</p>
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B. Facility Location: 800 N. Eckhoff Street, Orange

Facility Element	Findings	Corrective Action
Parking	<p>Freestanding signs are too low at 77", 79", 76", 75", and 75".</p> <p>No "Minimum Fine \$250" signage below the ISA sign.</p>	<p>Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.4.1, ADA 4.6.5) p 134</p> <p>For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133</p>
Men's Restroom	<p>Door sign is too high at 64".</p> <p>Wall sign is too low at 59".</p>	<p>Door sign and wall sign shall be 60" above the floor to the center line of sign.</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 281</p>
Women's Restroom	<p>Wall sign is too low at 58".</p>	<p>Door sign and wall sign shall be 60" above the floor to the center line of sign.</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 281</p>

	<p>Pipes under sink need to be rewrapped.</p> <p>Sanitary dispenser is too high at 52".</p>	<p>Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.4.7.1, ADA 4.24.6) p 343</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 T24 1115B.8.3, ADA 4.23.7) p 294</p>
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C. Facility Location: 1928 S. Grand Avenue, Santa Ana

Facility Element	Findings	Corrective Action
<p>Parking</p>	<p>Accessible and Van-accessible spaces are too short in length at 17".</p> <p>No "Minimum Fine \$250" signage below the ISA sign.</p>	<p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p 135</p> <p>Access aisles should be located on the passenger side of a space, and should be a min. of 18' long by 5" wide for aisles, serving car accessible spaces, and a min. 18' by 8' wide for aisles serving van accessible spaces. (CA T24 1129B.3.1) (ADA 4.6.3)</p> <p>For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133</p>

Women's Restroom	Force to open door is excessive at 8 lbs.	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 201
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D. Facility Location: 1000 E. Santa Ana Blvd., Ste 300, Santa Ana

Facility Element	Findings	Corrective Action
This office is in a part of a transit facility with other occupants.	The office and elevator access are accessible.	None required

E. Facility Location: 2020 W. Walnut Ave, Santa Ana

Facility Element	Findings	Corrective Action
Parking	<p>There was no "Unauthorized Parking" sign at entrance to off-street accessible parking.</p> <p>No "Minimum Fine \$250" signage below the ISA sign.</p>	<p>Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p 133</p> <p>For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the</p>

	<p>Accessible space is too short in length at 17'½".</p> <p>Van-accessible space is too short in length at 16'4".</p> <p>Van-accessible access aisle is too short in length at 16'4" and too narrow in width at 6'6 ½".</p>	<p>symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133</p> <p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p 135</p> <p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p 135</p> <p>Access aisles should be located on the passenger side of a space, and should be a min. of 18' long by 5" wide for aisles, serving car accessible spaces, and a min. 18' by 8' wide for aisles serving van accessible spaces. (CA T24 1129B.3.1) (ADA 4.6.3)</p>
Men's Restroom	Wall sign is too high at 67".	<p>Door sign and wall sign shall be 60" above the floor to the center line of sign.</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 281</p>
Women's Restroom	Wall sign is too high at 65 ½".	Door sign and wall sign shall be 60" above the floor to the center line of sign.

	<p>Force to open door is excessive at 9 lbs.</p> <p>The toilet tissue dispenser is too far at 14 ½”.</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 281</p> <p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 201</p> <p>Toilet tissues dispensers are located on the wall within 12” of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301</p> <p>Toilet paper dispenser minimum height from floor is 19”. (CA T24 1115B.8.4, ADA 4.16.6) pp 295, 301</p>
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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			At initial contact all clients are asked about their language need.
Does the county use a primary language form?		X		
Does the client self-declare on this form?		X		
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Staff identifies clients language needs at initial contact and provides bilingual services by assigning a bilingual worker or contacting the Language line.
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			See above comments.
Is there a delay in providing services?		X		

Question	Yes	No	Some-times	Comments
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			Bilingual roster is available and a contract with World Language Services is in place.
Are county interpreters determined to be competent?	X			Bilingual staff must be certified through examination process.
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?		X		
Does the county allow the client to provide his or her own interpreter?	X			Clients and client provided interpreter must sign form F063-02-217 Certification of Confidentiality.
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			CalWIN system generates Notices in client's primary languages.
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	X			

Question	Yes	No	Some-times	Comments
impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?				
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			SSA's Administration Procedure E21 identifies services to be utilized for clients who cannot read or write.
Does the county offer screening for learning disabilities?	X			
Is there an established process for offering screening?	X			At initial screening in Welfare to Work Program.
Is the client identified as having a learning disability referred for evaluation?	X			Clients are referred for further screening to determine their needs.

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

Documented Item	Children's Services	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	Referral Form, CWS-CMS	SAWS1, CalIN	SAWS1, CalWIN
Primary language documentation	Referral Form, CWS-CMS	SAWS1, CalWIN	SAWS1, CalWIN
Method of providing bilingual services and documentation	CWS-CMS case comments	CalWIN case comments	CalWIN case comments
Client provided own interpreter	None found in case sample	None found in case sample	None found in case sample
Method to inform client of potential problem using own interpreter	None found in case sample	None found in case sample	None found in case sample
Release of information to Interpreter	None found in case sample	None found in case sample	None found in case sample
Individual's acceptance or refusal of written material offered in primary language	None found in case sample	None found in case sample	None found in case sample
Documentation of minor used as interpreter	None found in case sample	None found in case sample	None found in case sample
Documentation of circumstances for using minor	None found in case sample	None found in case sample	None found in case sample

Documented Item	Children's Services	CalWORKs & Employment Services	Non-Assistance CalFresh
interpreter temporarily			
Translated notice of actions (NOA) contain translated inserts	None found in case sample	None found in case sample	None found in case sample
Method of identifying client's disability	None found in case sample	None found in case sample	None found in case sample
Method of documenting a client's request for auxiliary aids and services	None found in case sample	None found in case sample	None found in case sample

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			Staff receives continued training on annual basis through on-line tutorial.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			

Does the county provide employees Cultural Awareness Training?	X			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?		X		Fifty percent of staff interviewed did not appear to have an understanding of MEPA (Multi-Ethnic Placement Act).
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions

Training Area	Corrective Action
MEPA Training for Children's Social Workers	Orange County Social Services Agency shall ensure that CSW's receive MEPA training to ensure that public contact staff has knowledge of, and properly apply the placement prohibitions contained in MEPA. 42 U.S.C. 672, 674, and 1996(b)

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,		X		Twenty-three percent of staff interviewed was not able to identify the difference

Interview and review areas	Yes	No	Some-times	Findings
discrimination, and a personnel complaint?				between the types of complaints.
Did the employees know who the Civil Rights Coordinator is?	X			
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			
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	Orange County Social Service Agency 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

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

Thank you for submitting your agency's Civil Rights Compliance Plan. Before approval, however, we are requesting the following augmentations to your plan:

- a.** Assurance of Compliance Agreement signed by the Director (original)

Please submit this item with your corrective action plan for this review.

X. CONCLUSION

The CDSS reviewers found Orange County Social Service Agency staff warm, welcoming, informative and very supportive. Particular thanks to Patricia Figueredo, Civil Rights Coordinator, for organizing the details of the review, and to Shawn Robinson, Back up Civil Rights Coordinator, and Joe Quader, ADA Facilities Coordinator who assisted in each of the facility reviews. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Orange County Social Service Agency in substantial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The Orange County Social Service Agency 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 of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations 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.