



CDSS

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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY

DEPARTMENT OF SOCIAL SERVICES

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EDMUND G. BROWN JR.
GOVERNOR

January 24, 2014

Patrick Duterte, Director
Solano County Health & Social Services Department
275 Beck Avenue, M/S 5-200
Fairfield, CA 94533

Dear Mr. Duterte:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of August 12-15, 2013. 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 60 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 enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at crb@dss.ca.gov.

We will provide a copy of your 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. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>.

If you need technical assistance in the development of your CAP, please feel free to contact Tiffany Marsh at (916) 651-6242. You may also contact her by e-mail at Tiffany.Marsh@dss.ca.gov.

Sincerely,

Original signed by Civil Rights Bureau Chief

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

Enclosure

c: Stephan Betz, Civil Rights Coordinator

Mike Papin, Chief
CalFresh Policy Bureau

John Mason, Chief
Field Operations Bureau

Sysvanh Kabkeo, Chief
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Legal Services of Northern California

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
Solano County Human Services Department**

**Conducted on
August 12-15, 2013**

**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
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Tiffany Marsh

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I. 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 Solano County Health and Social Services Department 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 August 12-16, 2013. An exit interview was held to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs Reviewed	Non-English languages spoken by a substantial number of clients (5% or more)
Vacaville and Dixon: Employment and Eligibility Services	1119 E. Monte Vista Ave. Vacaville	CalFresh, CalWORKs	Spanish
Fairfield: Employment and Eligibility Services	275 Beck Ave. Fairfield	CalFresh, CalWORKs, CWS, IHSS, WTW	Spanish, Tagalog
	435 Executive Court Fairfield	State Hearings	
Vallejo: Employment and Eligibility Services	365 Tuolumne Street Vallejo	Older Disabled Adult Services (ODAS), CalFresh, CalWORKs, WTW	Spanish, Tagalog

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2013-2014 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
- Discussion with community advocate groups. In this review the following organization(s) were contacted for feedback. The following organizations responded to our request:

Jodie Berger, Regional Counsel
Legal Services of Northern California
1810 Capitol Street
Vallejo, CA 94590

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	7	4
Children Social Workers	1	1
Adult Program Workers	2	1
Employment Services Workers	2	1
Receptionist/Screeners	3	3
Total	15	10

Program Manager Surveys

Number of surveys distributed	Unknown
Number of surveys received	6

Reviewed Case Files

English speakers' case files reviewed	30
Non-English or limited-English speakers' case files reviewed	88
Languages of clients' cases	Arabic, ASL, Cantonese, Chinese, Farsi, Filipino, French, Hmong, Japanese, Korean, Laotian, Mien, Punjabi, Samoan, Spanish, Tagalog, Urdu, 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 annual plan. Required corrective actions are stated within each section.

Section IX summarizes findings from discussions with community organizations, including advocate groups.

Section X reviews the county's Civil Rights Compliance Plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section XI 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			Staff will accommodate clients by scheduling appointments before and after regular office hours, conduct home visits and/or over-the-phone interview.
Does the county have extended hours to accommodate clients?		X		Office hours are 8:00 am – 5:00 pm. However, see above comment.
Can applicants access services when they cannot go to the office?	X			Clients may apply/recertify for benefits by mail, phone or online at mybenefitscalwin.org.
Does the county ensure the awareness of available services for individuals in remote areas?	X			The county has several out-stationed locations to provide information about available services.

- a. **Observation** – The Employment and Eligibility Services facilities have stationed a Self-Scan Kiosk in lobbies for clients to scan and upload documents without waiting to see a staff person. The Kiosks serve English and non-English speaking clients in languages: Arabic, Russian, Spanish, Tagalog, and Vietnamese. .

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet “Your Rights Under California Welfare Programs” (Pub 13 – 6/11)?	X			Pub 13 is provided at intake, recertification, Emergency Response, application packets and available in the lobby.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			Pub 13 is explained thoroughly to the clients during intake and recertification appointments.
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, Ukrainian, 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	The Pub 13 in Braille (6/11 version) was not available at the following offices: 1119 E. Monte Vista, Vacaville and 275 Beck Ave, Fairfield These items are available at the reception counter.
Were the current versions of the required posters present in the lobbies?	X			Pub 86 (03/07) AD 475B (12/99)
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?			X	2 of 14 staff interviewed could not give the location of the Civil Rights poster.
Were there instructional and directional signs posted in waiting areas and other places frequented	X			Instructional and directional information posted in threshold

Signage, posters, pamphlets	Yes	No	Some-times	Comments
by a substantial number of non-English-speaking clients translated into appropriate languages?				languages.

B. Corrective Actions

Informational Element	Corrective Action Required
Auxiliary aids	Solano County shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.

C. Recommendation – None

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”	06/11
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.cdss.ca.gov/civilrights/entres/forms/English/pub13.pdf>.

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

1. Facility Location: 1119 E. Monte Vista Ave., Vacaville

Facility Element	Findings	Corrective Action
Restroom	Women: Sanitary napkins dispensers measured high at 44 ½" on the first floor and 44" on the second floor.	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. 304

a. Recommendation – None

2. Facility Location: 275 Beck Ave., Fairfield

Facility Element	Findings	Corrective Action
Parking	No additional signage of "Minimum Fine \$250" displayed below the sign of accessible parking. Access aisles measured short in width at 4'8" and van access aisle width at 7'8".	An additional sign or additional language below the symbol sign of accessibility shall state "Minimum Fine \$250" (CA T24 1129B.4) p 134 Access aisles should be located on the passenger side of a space, and should be a min. of 18' long by 5' wide or aisles, serving car accessible space.

	Freestanding accessible parking signage on the far right side of building measured low at 78".	<p>Access aisle dimensions 8' wide by 18' long, located on the passenger side. (CA T24 1129B.3.1 & 2)(ADA 4.6.3) p. 138</p> <p>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.4)(ADA 4.6.4) p. 134</p>
Restroom	<p>Both Men/Women's doors:</p> <p>Force to open doors excessive at 10 lbs.</p>	<p>Interior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5)(ADA 4.13.11(2)(B))</p>

a. Recommendation – None

3. Facility Location: 435 Executive Court, Fairfield – State Hearings

Facility Element	Findings	Corrective Action
Parking	<p>No additional signage of "Minimum Fine \$250" displayed below the sign of accessible parking.</p> <p>Access aisles measured short in width at 4'8" and van access aisle width at 7'8".</p> <p>Freestanding accessible signage measured low at 76"-77".</p>	<p>An additional sign or additional language below the symbol sign of accessibility shall state "Minimum Fine \$250". (CA T24 1129B.4) p 134</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 or aisles, serving car accessible space. (CA T24 1129B.3.1) p 136</p> <p>When in a path of travel, shall be posted at a height of 80" min. from the bottom of the sign</p>

	All accessible parking spaces measured short in length at 17",	to the finished grade. (CA T24 1129B.4)(ADA 4.6.4) p. 134 Parking space dimensions: 9' wide by 18' long. (CA T24 1129B.3.1 & 2) ADA 4.6.3) p 136
Exterior entrance	Force to open door excessive at 10 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 207 Force to open fire door, minimum allowable not to exceed 15 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(1)) p 207
Restroom	Force to open door excessive at 14 lbs.	Interior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5)(ADA 4.13.11(2)(B))

a. Recommendation – None

4. Facility Location: 365 Tuolumne Street, Vallejo

Facility Element	Findings	Corrective Action
Parking	No "Unauthorized Parking..." signage displayed at the entrances to the off-street parking.	An additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. The sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying

		<p>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 _____."</p> <p>Blank spaces are to be filled in with appropriate information as a permanent part of the sign. (CA T24 1129B.4) p 134</p>
Restroom	<p>Men: 2nd Floor: Force to open door excessive at 10 lbs.</p> <p>Women: 2nd Floor: Force to open door excessive at 12 lbs.</p>	<p>Interior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5)(ADA 4.13.11(2)(B))</p> <p>Interior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5)(ADA 4.13.11(2)(B))</p>

a. Recommendation – None

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			Client self-declares preferred verbal/written language at initial contact or during the application process.
Does the county use a primary language form?	X			County uses the Language Services Needs Request form (Form 48-12-324). This form is available in intake/recertification application packets.
Does the client self-declare on this form?	X			Client completes the form to indicate his/her need for interpretive services.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Bilingual staff and interpretive/ translation services are available to clients at each point of contact.
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			Client's language needs are documented in the CalWIN and CWS/CMS database. This indicates preferred language needs at each point of contact.
Is there a delay in providing services?		X		The county may obtain interpretive services from other agencies, volunteer organizations, and contracted agency.

Question	Yes	No	Some-times	Comments
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			The county staff has access to a roster of certified bilingual in a second language and Corporate Translation Services (CTS) Language Link, contracted translation services.
Are county interpreters determined to be competent?	X			
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			The client and client-provided interpreter must complete and sign the Interpreter Confidentiality and Release of Information Form (48-12-324).
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			Client receives information and forms in preferred language as indicated on language form.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			

Question	Yes	No	Some-times	Comments
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 the Pub 13)?	X			Staff has access to CA Relay Service, large print material, and interpretive services.
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			Disability screening is offered and conducted by Employment Resources during assessment.
Is the client identified as having a learning disability referred for evaluation?	X			Client is referred for further evaluation if disability screening indicates a learning disability.

B. Corrective Actions – None

C. Recommendation – None

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	Adult Programs (IHSS & ODAS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	CWS/CMS: Demographics, Face Sheet, Emergency Response Referral Sheet	Face Sheet, SOC. 293	CalWIN: Demographic Summary	CalWIN: Demographic Summary, SAWS 1
Primary language documentation	CWS/CMS: Demographics, Face Sheet, Emergency Response Referral Sheet	Face Sheet, SOC. 293	CalWIN: Demographic Summary, Case Comments	CalWIN: Demographic Summary, SAWS 1
Method of providing bilingual services and documentation	CWS/CMS: Case Narrative	Case Notes (Many case files reviewed were not adequately documented.)	Case Comments	Case Comments (Many case files reviewed were not adequately documented.)
Client provided own interpreter	None found in case sample	Case Notes	Case Comments	Case Comments
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	None found in case sample
Release of information to Interpreter	None found in case sample	Case File, Release of Confidentiality Information Form (48-OD-14)	Case Comments	Case Comments, Authorization Representative Form (MC 306)
Individual's acceptance or refusal of written material offered in primary	None found in case sample	Case File, Language Service Needs Request Form (48-OD-27)	Case Comments	Case Comments, Language Service Needs Request Form (48-OD-27)

Documented Item	Children's Services	Adult Programs (IHSS & ODAS)	CalWORKs & Employment Services	Non-Assistance CalFresh
language				
Documentation of minor used as interpreter	None found in case sample	None found in case sample	None found in case sample	None found in case sample
Documentation of circumstances for using minor interpreter temporarily	None found in case sample	None found in case sample	None found in case sample	None found in case sample
Translated notice of actions (NOA) contain translated inserts	None found in case sample	None found in case sample	CalWIN: Case Comments COMPASS (Imaging program county uses to file documents instead of hard files): Client Correspondence	CalWIN: Case Comments COMPASS (Imaging program county uses to file documents instead of hard files): Client Correspondence
Method of identifying client's disability	None found in case sample	Face Sheet, SOC. 293	CalWIN: Demographic Summary, SAWS 1 & 2	CalWIN: Demographic Summary, SAWS 1 & 2
Method of documenting a client's request for auxiliary aids and services	None found in case sample	None found in case sample	Case Notes	Case Notes

B. Corrective Actions:

Areas of Action	Corrective Action
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 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	Solano County must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116 Refer to ACL 08-65: Documentation of Interpretive Services and Division 21 Section 21-116 for clarification on information requirements to be documented in case comments/narratives.

C. Recommendation – None

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			Civil Rights training provided by UC Davis. Staff are required to attend training every two years.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			All staff interviewed understand county policy and procedure for clients to file a discrimination complaint.
Does the county provide employees Cultural Awareness Training?	X			Included in the New Employee training.
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 – None

C. Recommendation – None

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	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?			X	3 out of 14 staff interviewed could not clearly distinguish the difference between the three types of discrimination 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	2 out of 14 staff interviewed did not know where the Civil Rights poster could be located by the clients. All staff provided other resources of where the client could retrieve the 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	Solano 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	Solano 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
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D. Recommendation – None

IX. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups. The following summarizes their observations, and will provide issues that the county management team can address to improve their operations from a civil rights perspective.

A. Major observations include:

1. There was no response from Legal Services of Northern California.

B. Corrective Actions: None

C. Recommendations: None

X. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Solano County Health and Social Services Civil Rights Compliance Plan for the period September 1, 2013 through August 31, 2014, was received on August 9, 2013. It is approved as submitted.

XI. CONCLUSION

The CDSS reviewer found the Solano County Health and Social Services staff warm, welcoming, informative and very supportive. Particular thanks to Stephan Betz, Civil Rights Coordinator, for organizing the details of the review, Perry Sauro, Facilities Manager, and staff 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 Solano County Health and Social Services 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 Solano County Health and Social Services 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.