



CDSS

WILL LIGHTBOURNE  
DIRECTOR

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

744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



EDMUND G. BROWN JR.  
GOVERNOR

August 3, 2011

Jim Semmes, Director  
Imperial County Department of Social Services  
2995 S. Fourth St., #105  
El Centro, CA 92243

Dear Mr. Semmes:

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 February 2011. 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 1, 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](mailto:crb@dss.ca.gov).

Sincerely,

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

Enclosure

c: Javier Duran, Civil Rights Coordinator  
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR  
Imperial County Department of Social Services  
Conducted February 2011**

**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**

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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 Imperial County Department of Social Services 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 February 15 – 18, 2011. An exit interview was held on February 18, 2011 to review the preliminary 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>
Brawley Family Resource Center (Brawley High School)	480 N Imperial Ave Brawley, CA 92227	Cash AID, Food Stamps	Spanish
Brawley One-Stop	860 Main Street Brawley, CA 92227	CalWORKS, Children's Services	Spanish
Calexico Family Resource Center (Mains Elementary School)	604 Birch Street Calexico, CA 92231	N/A	Spanish
*Imperial County Dept of Social Services	2895 S 4 <sup>th</sup> Street 2995 S 4 <sup>th</sup> Street 2999 S 4 <sup>th</sup> Street	N/A	Spanish

\* Only lobby area of offices located on 4<sup>th</sup> street were visited

### **II. SUMMARY OF METHODOLOGY**

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

- Reviewed the 2010 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

<b>Classifications</b>	<b>Total</b>	<b>Bilingual</b>
Eligibility Workers	8	7
Intake Workers	4	4
Adult Program Workers	2	1
Receptionist/Screeners	6	6
<b>Total</b>	<b>20</b>	<b>18</b>

An additional 2 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	5
Non-English or limited-English speakers' case files reviewed	52
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 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**

<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			
Does the county have extended hours to accommodate clients?	X			
Can applicants access services when they cannot go to the office?	X			
Does the county ensure the awareness of available services for individuals in remote areas?	X			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)?	X			
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			
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	<p>480 N Imperial Ave displayed outdated versions of the PUB 13 in English and Spanish.</p> <p>860 Main Street did <u>not</u> have the PUB 13 available in the lobby.</p> <p>604 Birch Ave did <u>not</u> have the PUB 13 available in the lobby.</p>
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*		*Staff that had knowledge of the PUB 13 were able to pull up the civil rights website and print out the PUB 13 in the available languages.
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?			X	<p>480 N Imperial Ave did <u>not</u> have any of the PUB 13s available.</p> <p>860 Main St did <u>not</u> have any of the PUB 13s available.</p> <p>2995 S 4<sup>th</sup> Street, Suite 101 staff were aware of the Braille, audio, and large print requirements, but they</p>



Signage, posters, pamphlets	Yes	No	Some-times	Comments
				were not able to produce any of them. Staff claimed that the PUB 13s were locked and the supervisor had the key.  2995 S 4 <sup>th</sup> Street, Suite 104 staff were <u>not</u> able to produce the PUB 13. In fact, neither staff knew what the PUB 13 was.
Were the current versions of the required posters present in the lobbies?			X	2995 S 4 <sup>th</sup> Street lobby Suite 104 had an outdated "And Justice For All" Poster.  2999 S 4 <sup>th</sup> Street lobby did <u>not</u> have "And Justice For All" poster.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?			X	Staff at the Brawley One Stop (albeit they were not CDSS Staff) did not know where to find either of the required posters.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			

## B. Corrective Actions

Informational Element	Corrective Action Required
Translated Pub 13	Imperial County Department of Social Services shall ensure that the current version of the Pub 13 is

Informational Element	Corrective Action Required
	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
Auxiliary aids	Imperial County Department of Social Services 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. 21-115.4
Posters	Imperial County Department of Social Services 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 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](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:** 480 N. Imperial Ave, Brawley, CA

Facility Element	Findings	Corrective Action
Parking	No UNAUTHORIZED PARKING sign at parking lot entrance (accessible spaces are located on the campus of Brawley HS.)	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
	Van accessible space does not have proper van accessible signage	Each parking space for persons with disabilities shall be identified by a reflectorized sign

		<p>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>Accessible sign missing \$250 min fine</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>Van accessible parking space only 15 feet long</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>Exterior entrance</p>	<p>No accessible signage at building's entrance</p>	<p>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.5.1) pp 186, 394</p>

Restroom	<p>Unisex: No accessible signage on door or wall</p> <p>Soap dispenser too high at 46 in</p> <p>Toilet protector too high at 46 in</p> <p>Mirror base too high at 40 in</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>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>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. Recommendation**

None

**C. Facility Location:** 860 Main St, Brawley CA

Facility Element	Findings	Corrective Action
Parking	No UNAUTHORIZED PARKING sign at parking	Additional sign shall be posted in conspicuous place at



	The words NO PARKING not painted in access aisle	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
Exterior entrance	No accessible signage at building's 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.5.1) pp 186, 394
Restroom	<p><b>Men's:</b> No wall mounted accessible signage on latch side of door</p> <p>Soap dispenser too high at 52 in</p> <p>Paper towel dispenser too high at 52 in</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>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>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with</p>

	<p><b>Woman's:</b> No wall mounted accessible signage on latch side of door</p>	<p>all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p 294</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>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>Soap dispenser too high at 52 in</p> <p>Paper towel dispenser too high at 52 in</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>

#### D. Recommendation

None



**E. Facility Location:** 604 Birch St, Calexico, CA

Facility Element	Findings	Corrective Action
Parking	NO UNAUTHORIZED PARKING sign at parking lot entrance	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
	No van-accessible parking space	One in every 8 <i>accessible</i> spaces (no fewer than 1) shall be designated van accessible. (CA T24 1129B.3.2, ADA 4.1.2(5)(b)) p 136
	Accessible space does not have freestanding sign	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.  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

	The words NO PARKING not painted in access aisle	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
Exterior entrance	No accessible signage at building's 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.5.1) pp 186, 394
Restroom	<p>Unisex Restroom: No wall mounted accessible signage on latch side of door</p> <p>Pipes under sink not insulated</p> <p>Toilet protector too high at 50 in</p> <p>Mirror base too high at 50 in</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>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</p>

	<p>Grab bar too low at 26 in. No grab bar on back side of toilet (there is a grab bar on the opposite side of the restroom by the sink)</p>	<p>all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p 294</p> <p>The height of grab bar is 33" above and parallel to floor except that where a tank-type toilet used obstructs the 33" placement, the grab bar may be as high at 36". Grab bar is securely attached. (CA T24 1115B.4.1.3(3.2), ADA 4.17.6 and CA T24 1115 B.7.1, ADA 4.26.2) p 298</p>
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#### F. 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			In many of the lobbies, they have posters made available that ask a client their native language. In almost all of the lobbies were "I SPEAK" signs that aided in identifying a client's primary language.
Does the county use a primary language form?	X			Imperial County uses what they referred to as a "face sheet." This 2-sided sheet (one side in English, the other in Spanish) allows the client to designate their primary language, whether or not they require an interpreter, etc. For clients who do not write/speak English or Spanish, a translator is used and the English form is filled out.
Does the client self-declare on this form?	X			The client must print their name, date, and sign at the bottom of the form.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Most workers at the offices visited are certified bilingual workers.
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			
Is there a delay in providing services?			X	Some workers mentioned that there has been delays in languages other than Spanish.
Does the county have a	X			Imperial County uses a

Question	Yes	No	Some-times	Comments
language line provider, a county interpreter list, or any other interpreter process?				language line.
Are county interpreters determined to be competent?	X			County interpreters must be certified.
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			
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			Bilingual workers stated that since the all of their caseloads are in Spanish, this issue rarely arises.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			All the files reviewed in CIV had the proper forms in the clients language. It should be noted that the only other language was Spanish.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			See above comment
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with			X	A TDD was not available in every office and not all office lobbies had the Braille PUB 13.

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			Clients who are determined to have learning disabilities are accommodated as needed.
Is there an established process for offering screening?		X		
Is the client identified as having a learning disability referred for evaluation?				N/A, see above

## B. Corrective Actions

Timely Services	Imperial County must ensure that bilingual/interpretive services are prompt and without undue delay. Div. 21-115
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## 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**

<b>Documented Item</b>	<b>Children's Services</b>	<b>CalWORKs &amp; Employment Services</b>	<b>Non-Assistance CalFresh</b>
Ethnic origin documentation	CWS/CMS	SAWS 1; Face Sheet	SAWS 1; Face Sheet
Primary language documentation	CWS/CMS	SAWS 1; Face Sheet	SAWS 1; Face Sheet
Method of providing bilingual services and documentation	Certified Bilingual Worker; Documentation in CWS/CMS	Case narrative	Case narrative
Client provided own interpreter	CWS/CMS	None Found	None Found
Method to inform client of potential problem using own interpreter	None found	None found	None found
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	Face Sheet	Face Sheet
Documentation of minor used as interpreter	None Found	N/A	N/A
Documentation of circumstances for using minor interpreter temporarily	None Found	N/A	N/A

Documented Item	Children's Services	CalWORKs & Employment Services	Non-Assistance CalFresh
Translated notice of actions (NOA) contain translated inserts	N/A	All notices were sent in appropriate language	All notices were sent in appropriate language
Method of identifying client's disability	None Found	None Found	None Found
Method of documenting a client's request for auxiliary aids and services	None Found	None Found	None Found

## 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
General	Imperial 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

Since Imperial County has such a large population of both Spanish-speaking workers and Spanish-speaking clients, it is easy to omit the documentation of the translation services. In many cases, the Spanish speaking worker was speaking to the client in their native language, Spanish. This must always be considered the county providing a services to the



client. It is important that these occurrences be documented as detailed in Division 21 and more clearly defined in ACIN I-09-06 (referencing ACL 03-56.)

## **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**

<b>Interview questions</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Do employees receive continued Division 21 Training?	X			All employees interviewed indicated that they had been trained within the last 18 months
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?			X	Most employees interviewed were able to explain the complaint process. Some employees said they had never experienced a discrimination complaint, therefore they would direct such complaints to their supervisor. After their supervisory received the complaint, they had no idea where it would go from there.
Does the county provide employees Cultural Awareness Training?	X			
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	Imperial 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

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	Most of the time. Some employees were unable to explain a personnel complaint or a program complaint.
Did the employees know who the Civil Rights Coordinator is?			X	Most of the employees were able to answer correctly. Of the 20 county employees interviewed, 4 were unable to give the CRC's name.
Did the employees know the location of the Civil Rights poster showing where the clients can file a			X	Most of the time. Of the 20 county employees interviewed, 3 were unaware of a Civil Rights poster in the

Interview and review areas	Yes	No	Some-times	Findings
discrimination complaint?				lobby.
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	Imperial 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	Imperial 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

None

## IX. CONCLUSION

The CDSS reviewer found the Imperial County Department of Social Services staff warm, welcoming, informative and very supportive. Particular thanks to Javier Duran, Civil Rights Coordinator, for organizing the details of the review, and to the facilities managers who assisted in each of the facility reviews. In each Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the imperial County Department of 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 Imperial County Department of 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.