



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

March 14, 2012

Trent Rhorer, Executive Director
City & County Department of Human Services Agency
P.O. Box 7988
San Francisco, CA 94120-7988

Dear Mr. Rhorer:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office, Elsa Garcia during the course of the Civil Rights Compliance Review of March 14-18, 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. In addition, they 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 the Civil Rights Bureau at (916) 654-2107. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

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

Enclosure

c: Robert Thomas, Civil Rights Coordinator

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

FOR

San Francisco Health & Human Services

Conducted on

March 14-18, 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

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Reviewer

Elsa Garcia

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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 San Francisco City & County Department of Human Services Agency (HSA) 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 March 14-18, 2011. An exit interview was held to review the preliminary findings.

The review was conducted in the following locations:

Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
1235 Mission Street	CalFresh	Chinese, Cantonese, Mandarin, Spanish, Vietnamese, Russian and Tagalog
3801 Third Street	Children's Services (ER, FM & FR)	Spanish
170 Otis Street	CalFresh	Spanish & Cantonese
1440 Harrison Street	CAPL	Spanish & Cantonese

II. SUMMARY OF METHODOLOGY

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

- Reviewed the Feb 2010 – Dec. 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

Classifications	Total	Bilingual
Eligibility Workers	9	7
Children Social Workers	4	2
Receptionist/Screeners	3	3
Total	16	12

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	0
Non-English or limited-English speakers' case files reviewed	120
Languages of clients' cases	Spanish, Chinese, Cantonese, Mandarin, Russian, Tagalog, 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 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			Applicants can mail in their application. Accommodation can be requested if the client has a need due to ADA reasons.
Does the county have extended hours to accommodate clients?	X			Staff will work with the clients to offer phone interviews, mail

				applications, web application, quarterly reports and recertification's to meet the needs of customers who can not access the office during normal business hours. Also, arrangements can be made for a home visit if a client is unable to come to the office due to ADA reasons.
Can applicants access services when they cannot go to the office?	X			Applicants can access information about the Agency on the City's 3-1-1 information line, and the website at www.benefitsSF.org or www.benefits.CalWIN.org or they can call the Food assistance service center IVR at 558-1001.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Information and applications are available by phone, mail, and on HSA website. HSA work's with a network of Community Based Organizations (CBO's) around the city as well as with neighborhood hospitals and clinics.

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			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			The Pub 13 is included in all application packets and discussed during the intake and recertification process.
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		At the Distribution site adjacent to 1235 Mission Street Office, there was no display of the Pub 13 available in lobby.
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?		X		At the 1235 Mission Street Office - Client's Main lobby the Pub 13 was not available in Braille. Also, at the 3801 Third Street Office, the Large Print version of Pub 13 was not available.
Were the current versions of the required posters present in the lobbies?		X		At the Distribution site adjacent to 1235 Mission Street Office, the following posters: Pub 86 (And Justice For All) or FNS #475B (Everyone is Different, but Equal Under the Law) were not posted in lobby. Also, at 170 Otis Office the Pub 86 poster was outdated and did not have current Civil Rights Coordinator contact information.
Did the workers know the location of the required posters with the Civil				

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Rights Coordinator's name and address?	X			
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
Auxiliary aids	HSA 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
Distribution of CDSS' Pub 13	XXXX County shall ensure that the Pub 13 pamphlet, "Your Rights Under California Welfare Programs" is both given and explained to program participants in all of the programs for which CDSS has oversight responsibility. Div. 21-107.221
Posters	HSA 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"	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.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: 1235 Mission Street, San Francisco

Facility Element	Findings	Corrective Action
Main Entrance – This facility has three entrances; 1. Client's Main Entrance 2. 1235 Entrance and	There is no International Symbol of Accessibility (ISA) signage outside of Client's Main Entrance. There is no directional signage to Client's Main	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

<p>3. Distribution Site Entrance.</p>	<p>Entrance from 1235 Entrance.</p> <p>Force to open doors is excessive: & 1235 Entrance: 13 lbs Distribution Site: 17 lbs</p>	<p>T24 1117B.5.1) pp 186, 394</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 207</p>
<p>Distribution site lobby</p>	<p>The house phones do not have the required clear width, path or maneuvering space.</p>	<p>No reduction in the required clear width or path or maneuvering space. (CA T24 1133B.8.6.1, ADA 4.4.1) p 273</p>
<p>Men's Restroom in Client's lobby</p>	<p>Force to open door is excessive at 20 lbs.</p> <p>Pipes under sink were not securely wrapped.</p> <p>Toilet sheet protector was too high at 44".</p> <p>Accessible stall door latch was broken.</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 207</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> <p>Locking/Latching Doors: If hand-operated, to be operable with a single effort (e.g.; lever, panic bar, push/pull). (CA T24 1133B.2.5.2, ADA 4.13.9) p 205</p>
<p>Women's Restroom in Client's lobby</p>	<p>Restroom door closure was not set at 3 seconds.</p>	<p>Door Closer (if present) must be set so it takes at least 3 seconds to close from an open position of 70 degrees to a</p>

<p>Women's Restroom in Distribution site</p>	<p>Pipes under sink were not securely wrapped.</p> <p>Soap dispenser is too high at 43".</p> <p>Mirror base is too high at 43".</p>	<p>point 3" from the latch. (CA T24 1133B.2.5.1, ADA 4.13.10) p 205</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: 3801 Third Street, San Francisco

Facility Element	Findings	Corrective Action
<p>Parking</p>	<p>There is no proper accessible signage for parking space either on wall or freestanding sign.</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>Freestanding sign height (80"), proper signage. Wall-mounted sign height (36" minimum).</p> <p>The sign shall be 70 sq. in. min. and, when in a path of travel, shall be posted at a height of 80" min. from the bottom of the</p>

	Ramp slope is too steep at 8.7%.	sign to the finished grade. (CA T24 1129B.) (ADA4.6.4) p133 Slope of ramp does not exceed 1:12 (8.3% slope). (CA T24 1127B.5.3, ADA 4.8.2) p 155
Main Entrance	Force to open door is excessive at 7 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
Lower level Men's Restroom	Force to open door is excessive at 12 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
Lower level Women's Restroom	Force to open door is excessive at 13 lbs. Soap dispenser is too high at 46".	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 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
Second level Men's Restroom -	Door signage is too high at 63". No wall signage adjacent to latch of door.	Door sign and wall sign shall be 60" above the floor to the center line of sign. 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>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>Second level Women's Restroom</p>	<p>Door signage is too high at 65". No wall sign adjacent to latch of door.</p> <p>Pipes under sink were not securely wrapped.</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>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>

E. Facility Location: 170 Otis, San Francisco

Facility Element	Findings	Corrective Action
Men's Restroom	One of the four sinks had pipes that were not securely wrapped.	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

G. Facility Location: 1440 Harrison Street, San Francisco

Facility Element	Findings	Corrective Action
-----	No Findings	-----

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			Reception staff identifies the language needs utilizing the "I Speak" cards. Clients also identify on SAWS1 application, and/or Language Service Needs Form 8072.
Does the county use a primary language form?	X			Language Service Needs Form 8072.
Does the client self-declare on this form?	X			Clients self identify on SAWS1 application which is then keyed into CalWIN system. Clients fill out the Language Service Needs Form 8072.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Clients are provided bilingual services through bilingual staff as interpreters, or access to telephone interpretation services through a contract with 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			
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			HSA has a contract with Language Line, and certified bilingual staff available.
Are county interpreters determined to be competent?	X			HSA bilingual staff is certified through testing in the designated language by the HSA Examination Unit.

Question	Yes	No	Some-times	Comments
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?		X		Only in an "emergency" situation would a minor be allowed to expedite immediate services.
Does the county allow the client to provide his or her own interpreter?	X			If client chooses to utilize their own interpreter, HSA has created the Client Consent-Release of Information and Use of Non-HSA Interpreters Form.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			Staff verbally explain and provide Client Consent-Release of Information and Use of Non-HSA Interpreters Form.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			Forms are readily available in the office and on line.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			The bilingual worker will verbally translate information and include notes in the clients' primary language.
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		At the 1235 Mission Street Office - Client's Main lobby the Pub 13 was not available in Braille. At the 3801 Third Street Office, the Pub 13 was not available in large print.
Does the county identify and assist the client who has learning disabilities	X			An ADA worker is available in the lobby to assist clients with disabilities that may need an

Question	Yes	No	Some-times	Comments
or a client who cannot read or write?				accommodation. To better serve clients, HSA developed Form OCR 1. The Americans with Disability Act: Your Rights to HSA Services and Programs, and OCR 2 Invitation to Disclose which is included in all intake and renewal packets.
Does the county offer screening for learning disabilities?	X			ADA worker is available in lobby.
Is there an established process for offering screening?	X			ADA worker does the screening.
Is the client identified as having a learning disability referred for evaluation?	X			

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	CAPI	CalWORKs	CalFresh
Ethnic origin documentation	ER/Referral, CWS-CMS	SAWS1 CalWIN	SAWS1 CalWIN	CalWIN SAWS1
Primary language documentation	Form 8072, ER/Referral, court docs	Form 8072	SAWS1, Form 8072 was not consistent in	DFA 285, SAWS1, Form 8072 was not

Documented Item	Children's Services	CAPI	CalWORKs	CalFresh
			all case sample reviewed	consistent in all case sample reviewed
Method of providing bilingual services and documentation	CWS-CMS	Form 8072	CalWIN case notes, Form 8072	CalWIN case notes, Form 8072
Client provided own interpreter			CalWIN case journal notes	CalWIN case journal notes
Method to inform client of potential problem using own interpreter		Form OCR-3, Client Consent Release of Information	Form OCR-3 Client Consent Release of Information	Form OCR-3 Client Consent Release of Information
Release of information to Interpreter		Form OCR-3	Form OCR-3	Form OCR-3
Individual's acceptance or refusal of written material offered in primary language		Form 8072	Form 8072	Form 8071
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	n/a	CalWIN	CalWIN	CalWIN

Documented Item	Children's Services	CAPI	CalWORKs	CalFresh
Method of identifying client's disability	None found in case sample	Form 8072, SOF, CalWIN, Form OCR 2	SOF, CalWIN, Form OCR 2	SOF, CalWIN, Form OCR 2
Method of documenting a client's request for auxiliary aids and services	None found in case sample	None found in case sample	CalWIN notes, SOF	None found in case sample

B. Corrective Actions

Areas of Action	Corrective Action
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22
General	HSA must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116 Please reference ACL 08-65, December 31, 2008, Documentation of Interpretive Services.

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			
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			All staff interviewed understood the county policy regarding a client's rights and procedures.
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			Alls staff interviewed were aware of the predominant cultural groups in their area.

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		Six out of the sixteen staff members interviewed did not know the difference between the three types of complaints.
Did the employees know who the Civil Rights Coordinator is?		X		Nine out of the sixteen staff interviewed did not know who their Civil Rights Coordinator is.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?		X		Seven out of sixteen staff members interviewed did not know the location of the Civil Rights Poster.
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	HSA 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	HSA 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

San Francisco City & County Department of Human Services shall disseminate Civil Rights Coordinator information to public contact staff immediately upon changes.

X. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The San Francisco City & County Department of Human Services Compliance Plan for the period February 29, 2010 – December 31, 2010 was received on February 04, 2011, is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the San Francisco City & County Department of Human Services staff warm, welcoming, informative and very supportive. Particular thanks to Robert Thomas, Civil Rights Coordinator, and Luenna Kim, Employee Relations Manager, for organizing the details of the review, and 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 San Francisco City & County Department of Human 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 San Francisco City & County Department of Human 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.