



CDSS

JOHN A. WAGNER
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



EDMUND G. BROWN JR.
GOVERNOR

April 8, 2011

Ms. Jo Webber, Director
Sonoma County Human Services Department
P.O. Box 1539
Santa Rosa, CA 95402-1539

Dear Ms. Webber:

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 March 14-16, 2011. Enclosed is the final report on the review.

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

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

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

Sincerely,

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

Enclosure

c: Kiergan Pegg, Civil Rights Coordinator

Linda Patterson, Branch Chief
CDSS CalFresh Program M.S. 8-9-32

Mike Papin, Chief
CalFresh Policy Bureau M.S. 8-9-32

Richard Trujillo, Chief
Field Operations Bureau M.S. 8-9-32

Brian Tam, Chief
CalFresh Management Operations Section M.S. 8-9-32

Paul Gardes
CalFresh Policy Bureau M.S. 8-9-32

Thuan Nguyen
Refugee Programs Bureau, M.S. 8-8-46

Joe Torres, Office of Civil Rights
USDA Food and Nutrition Services
CalFresh Program
Western Region

Dominic Pagano, Office of Civil Rights
USDA Food and Nutrition Services
CalFresh Program
Western Region

Hope Rios,
USDA Food and Nutrition Services
CalFresh Program
Western Region

Jodie Berger, Regional Counsel
Legal Services of Northern California

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
Sonoma County Human Services Department
Conducted on March 14-16, 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

Mary Rockwood

TABLE OF CONTENTS

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

CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Sonoma County Human Services Department (HSD) 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 14-16, 2011. An exit interview was held on March 16, 2011 to present the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Paulin Building	2550 Paulin Drive, Santa Rosa	CaWORKs Cash; CalFresh; WTW	Spanish
Mendocino Building	520 Mendocino Ave., Santa Rosa	CalFresh	Spanish
Family, Youth & Children's Building	1747 Copperhill Parkway, Santa Rosa	Child Protective Services (ER, FM/FR)	Spanish
Zephyr Building	3625 Westwind Blvd., Santa Rosa	IHSS	Spanish

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2010-11 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
- Vendor Contract Review
- Welfare Fraud Case Documentation Review

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

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

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Worker	2	2
Employment & Training Specialist	1	1
Children Social Workers/Practitioner	2	2
IHSS Social Workers	2	2
Reception/Lobby Staff	2	2
Total	9	9

Program Manager Surveys: 8 Completed Surveys submitted

Case File Reviews (Total 95 Cases)

English speakers' case files reviewed	5
Non-English or limited-English speakers' case files reviewed	90
Languages of clients' cases	Spanish, Mandarin, Lao, Korean, Tagalog, French, Vietnamese, Punjabi, Tigrina, Russian, ASL

Vendor Contract Review: 15 contracts reviewed to verify presence of required Assurance Of Compliance

Welfare Fraud Case Review: 10 cases reviewed for documentation of language services

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 is reserved for a discussion of the findings related to the annual plan update submitted as a part of the compliance review. In 2011, however, the annual update for Sonoma County had been submitted previously and approved separately in advance of the compliance review.

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	Sometimes	Comments
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			The office hours are not actually extended, but on a case-by-case basis, arrangements will be made.
Can applicants access services when they cannot go to the office?	X			Telephone interviews when permitted and

				home visits as necessary are provided.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Contracted service providers and community partners from outlying communities provide information locally. In addition, a SonomaWORKS website provides information on the programs, services and related links to services. This is provided in English and Spanish.

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			The degree of explanation varies among workers, but the pamphlet is a part of the intake and annual packets.
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			In practice, only the English and Spanish versions are utilized. Each reception desk has a binder with other versions available. (See discussion with Corrective Action).

Signage, Posters, Pamphlets	Yes	No	Some-times	Comments
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?		X		
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	X			
Were the current versions of the required posters present in the lobbies?		X		At the Mendocino Building, there was no CalFresh required poster: Form AD 475B "And Justice for All"
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			Currently the only threshold language requiring translated signage is Spanish. Adequate signage was provided.

B. Corrective Actions: The required posters must be displayed at the Mendocino site. (Missing was the Form AD 475B "And Justice for All").

C. Recommendations

Distribution of Publication 13

The case file review did not have sufficient numbers of cases to validate the worker practices related to use of translated Pub 13's. On the HSD 1259 Form, (Primary Language Form where the offer is made to clients for translated forms and interpreter services) most of the non-English/non-Spanish speaking clients opted for English forms and written material.

It did appear, however, from the staff interviews that workers knew only of the two versions and in practice provided English pamphlets to all clients who were not Spanish speaking, regardless of what may be checked on the HSD 1259 Form. Review of the

policies/practices related to the Pub 13 and use of other translations where appropriate is recommended. This topic may be one to be considered in the on-line civil rights training that is currently a part of the ongoing staff development (discussed later in this report in Section VII).

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
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#1: Paulin Building – 2550 Paulin Drive, Santa Rosa

Facility Element	Findings	Corrective Action
Parking	<p>1. The signage designating accessible parking spaces was not complete.</p> <p>2. The pavement did not have a continuous smooth surface without cracks or changes in level. Movement of a wheelchair or crutches, walkers or foot traffic on the rough surface was viewed as unsafe.</p>	<p>1. An additional sign below the international symbol of accessibility sign shall state "Minimum Fine \$250.00". (CA T24 1129B.4.1)</p> <p><u>Note:</u> The Van Accessible signage should be a separate sign below the standard sign instead of on the actual sign.</p> <p>2. Walks and sidewalks (including passenger loading/unloading aisles connecting to the sidewalk) shall have a continuous surface and be slip resistant. (CA T24 1133B.&.1, ADA 4.3.8)</p>
Lobby	<p>1. In the first of two lobby areas, there is no lowered counter; however, several work tables are available which accommodate wheelchair clients.</p> <p>In the second (main) lobby, waiting area, an accessible counter area is available and utilized.</p> <p>2. A hand sanitizer is provided, but mounted too high (56 "from the floor).</p>	<p>1. No corrective action required.</p> <p>2. If dispensing equipment is provided, at least one must be mounted so that all operable parts are at a maximum of 40" from the floor. (CA T24 1115B.8.3; ADA 4.23.7)</p>

Facility Element	Findings	Corrective Action
Restrooms	1. Door pressure measured for entrance to both the men's and women's restroom reflected ongoing effort to maintain the required maximum door pressure for accessible facilities.	1. No corrective action required. Recommendation: Maintain ongoing maintenance. (Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)])

Facility Location #2: Mendocino Building – 520 Mendocino Ave., Santa Rosa

Facility Element	Findings	Corrective Action
Parking	Sonoma County HSD does not provide parking for its clients. Clients utilize public transportation and/or city parking.	None required
Building/Entrance	<p>1. Access to the building requires travel up a ramp that measures in excess of 13 feet (two such ramps exist – one on each side of the entrance door). There were no hand rails installed for either ramp.</p> <p>2. There was no signage (usually a door decal) designating the building as accessible.</p> <p>3. The door pressure measured approximately 11 pounds for entry into the building.</p>	<p>1. Ramps longer than 6 feet must have hand railings on both sides. (CA T24 1133B.5.5.1, ADA 4.8.2)</p> <p>The handrails are to mounted 34"-38" above the ramp with cross section of rails 1 ¼ - 1 ½ inches.</p> <p>2. A sign with the international symbol of accessibility shall be at every primary entrance indicating accessibility. (CA T24 1127B.3, ADA 4.1.3)</p> <p>3. Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]</p>

Facility Element	Findings	Corrective Action
Lobby	1. A dispenser providing hand sanitizer was mounted on the wall 57" from the floor.	1. When providing dispensing or disposal fixtures, at least one must be located with all operable parts at a maximum height of 40 inches. (CA T24 1115B.8.3, ADA 4.23.7)
Restroom	<p>1. The restrooms can not currently be considered accessible. The restrooms are located in common area outside the HSD reception lobby with access to the locked restrooms requiring the use of a key (provided by the reception staff). The door, therefore, cannot be opened with a closed fist, but requires insertion and turning of a key in the lock.</p> <p>2. There was no wall signage for what has been designated as the accessible restroom facilities.</p> <p>3. Once inside the vestibule, individual men's & women's restrooms are provided. Door pressure for entry was reflective of efforts to maintain the 5lb. maximum.</p>	<p>1. Accessible doors must be operable with a single effort (e.g., lever, panic bar, push/pull). (CA T24 1133B.2.5.2, ADA 4.13.9)</p> <p>2. In addition to the international symbol centered on doors at a height of 60" above the floor (CA T24 1115B.5), signage for gender identification shall be installed on the wall adjacent to the latch outside of the door. If there is no space, the sign shall be placed on the nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6)</p> <p>3. No corrective action required, recommend ongoing monitoring to ensure accessibility.</p>

Facility Location #3: Copperhill CPS Bldg., 1747 Copperhill Parkway, Santa Rosa

Facility Element	Findings	Corrective Action
Parking	<p>1. The length of the accessible parking spaces did not meet the required 18'. Measurements reflected a range of 15 – 17 feet in length due largely to the interference of a concrete curb leveler.</p> <p>2. The signage designating accessible parking spaces was not complete.</p>	<p>1. Length of parking spaces shall be at least 18' long and 9' wide. (CA T24 1129B.3.1, ADA 4.6.3)</p> <p>2. An additional sign below the international symbol of accessibility sign shall state "Minimum Fine \$250.00". (CA T24 1129B.4.1)</p>
Lobby	<p>1. A dispenser providing hand sanitizer was mounted on the wall 49" from the floor.</p>	<p>1. When providing dispensing or disposal fixtures, at least one must be located with all operable parts at a maximum height of 40 inches. (CA T24 1115B.8.3, ADA 4.23.7)</p>
Restrooms	<p>Door pressure to open restroom measured approximately 12 pounds.</p>	<p>Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]</p>

Facility Location #4: Zephyr Bldg., 3625 Westwind Blvd., Santa Rosa

Facility Element	Findings	Corrective Action
Parking	<p>1.) The signage designating accessible parking spaces was not complete.</p>	<p>1.) An additional sign below the international symbol of accessibility sign shall state "Minimum Fine \$250.00". (CA T24 1129B.4.1)</p>

Additional Comments: Facility Reviews

It warrants noting for the record that in this review, both the HSD Facilities Administrator and the county's ADA Coordinator accompanied the reviewer and provided valuable input and assistance at each of the sites reviewed. In addition, a landlord representative (from the maintenance staff) attended the facility review at the Mendocino Building.

The agency's commitment to accessibility was reflected by this participation and was further evidenced by corrective actions that had been implemented as the result of prior compliance reviews.

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

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

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

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

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

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			At initial face-to-face contact or telephone contact. (The "I speak cards" are available in reception to assist if needed.)

Question	Yes	No	Some-times	Comments
Does the county use a primary language form?	X			Form HSD 1259
Does the client self-declare on this form?	X			Clients state their preferred spoken and written language choices. Information is then entered into the case recording system.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			Cases are generally assigned to bilingual workers.
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			
Are county interpreters determined to be competent?	X			Bilingual staff are tested and certified by the agency.
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?		X		

Question	Yes	No	Some-times	Comments
Does the county allow the client to provide his or her own interpreter?	X			
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			
Does the county use the CDSS-translated forms in the clients' primary languages?	X			Spanish forms are readily available and used. The clients speaking other languages generally ask for English forms according to staff and validated in the case file review.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			The auxiliary aids are available but rarely called for according to staff.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			Additional time and assistance is provided to individuals who may need the help.
Does the county offer screening for learning disabilities?	X			This offer and screening is available through Sonoma Works (WTW).

Question	Yes	No	Some-times	Comments
Is there an established process for offering screening?	X			It is a part of initial screening and assessment in WTW.
Is the client identified as having a learning disability referred for evaluation?	X			According to staff this would occur...again in the work programs.

B. Corrective Actions: None Required

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. Location of this information in the case records is noted below.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	Adult Programs (IHSS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	Initial ER Referral	Application (Soc 295)	Cal-Win SAWS 1	Cal-Win SAWS 1 or DFA 285
Primary language documentation	Initial ER Referral	Application (Soc 295) & HSD 1259.	Cal-Win and HSD 1259	Cal-Win and HSD 1259
Method of providing bilingual services and documentation	Case narrative in CWS/CMS (See comment at end of section)	Case Contact Log/Narrative	Cal-Win Journal (See comment at end of section)	Cal-Win Journal (See comment at end of section)
Client provided own interpreter	N/A (Agency provides interpreters)	Case Contact Log/Narrative	Cal-Win Journal	Cal-Win Journal

Documented Item	Children's Services	Adult Programs (IHSS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Method to inform client of potential problem using own interpreter	N/A	Is not a current practice.	Is not a current practice.	Is not a current practice.
Release of information to Interpreter	N/A	Release of Confidentiality Form	Release of Confidentiality Form	Release of Confidentiality Form
Individual's acceptance or refusal of written material offered in primary language	HSD 1259	HSD 1259	HSD 1259 Cal-Win data fields reflect client choice	HSD 1259 Cal-Win data fields reflect client choice
Documentation of minor used as interpreter	N/A	Would be in case narrative	Would be in case narrative	Would be in case narrative
Documentation of circumstances for using minor interpreter temporarily	N/A	Not documented	Not documented	Not documented
Translated notice of actions (NOA) contain translated inserts	N/A	Worker inserts information as needed	Only if not preprinted on automated notices	Only if not preprinted on automated notices
Method of identifying client's disability	Various - CMS/CWS	Soc 295 and narrative	Cal-Win Journal	Cal-Win Journal
Method of documenting a client's request for auxiliary aids and services	Would be in worker narrative	Would be in case narrative	Would be in Cal-Win Journal	Would be in Cal-Win Journal

Additional Comments (Documenting by Bilingual Workers):

There was information gathered during interviews that indicated some bilingual workers are not aware of the need to document in the case record that they have provided the interpreter service to their clients. Because they are bilingual, they do not see that they are the "interpreter" as well and have not been trained to document in the case record that they have conducted the interviews/meeting in the primary language of the client.

This was a finding of inconsistent practice, as some bilingual workers were aware and others were not.

Review of Welfare Fraud Investigation Cases

The 2010 Civil Rights Compliance Review included a review of a sample of fraud investigation cases to determine the level of compliance with Division 21 documentation requirements related to the delivery of language services to non-English speaking or limited-English speaking clients during the investigation process. The cases reviewed were those of Spanish-speaking clients.

There was clear evidence that bilingual Spanish services were provided regularly. The Fraud Unit is staffed with a Spanish speaking Chief Investigator, two eligibility technicians and one investigator. There was, however, an absence of documentation in the records to record the delivery of language services by the bilingual staff.

The Welfare Fraud Investigation Unit's Chief took immediate action following discussion with the reviewer, advising staff of the need to document the communication in languages other than English. The Fraud Unit is encouraged to coordinate corrective action with the Civil Rights Coordinator as the Corrective Action Plan for the 2010 compliance review is prepared for submittal to CDSS.

B. Corrective Actions

Areas of Action	Corrective Action
Documentation that bilingual services were provided	HSD must take measures to ensure that staff 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

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			
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: None required

C. Recommendation:

Either through staff development or supervisory oversight focus needs to be directed to the case documentation by bilingual workers regarding language service they provide in the course of their casework (e.g., interpreter service).

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			Staff were able to articulate differences in the resolution processes for the 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			They knew that a poster was in the lobby for the clients.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Corrective Action: None Required

C. Review of Vendor Contracts

A sample of contracts was reviewed to determine compliance with the requirement for inclusion of an Assurance of Compliance by vendors in all contracts for services with HSD. There was 100 percent compliance in the contracts reviewed. In addition, the reviewer found that Sonoma County HSD has an excellent template format for contract content. This Assurance of Compliance is in the template used to ensure standard contract content and format.

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

In 2011, the annual civil rights plan update had previously been submitted and approved separately in advance of the compliance review.

X. CONCLUSION

The CDSS reviewer found the Sonoma County Human Services Department to be in substantial compliance with the CDSS Division 21 Regulations and other applicable state and federal laws.

The findings outlined in this report were discussed at the exit meeting which was attended by administrative staff. At that meeting, managers were advised of the positive review and, in particular, the consistent professionalism in both process and product observed by this reviewer. A note of special appreciation is extended to Judith Merrin for the coordination of the facility reviews. As noted in Section IV of this report, her participation and that of the county's ADA Coordinator greatly enhanced the review.

The documentation by bilingual workers as noted in the documentation section of this report remains an area of needed focus to ensure that workers understand their responsibility to include documentation of their role in the delivery of language services to those non-English speaking clients they serve as a bilingual worker. There is excellent bilingual service to assist the clients and this needs to be consistently documented.

The Sonoma County Human Services Department 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.