



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



EDMUND G. BROWN JR.
GOVERNOR

August 30, 2011

Michael L. Riley, Ph.D., Director
Orange County Social Services Agency
888 N. Main Street
Santa Ana, CA 92701

Dear Dr. Riley:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of May 23 – 27, 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 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.

Sincerely,

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

Enclosure

c: Lisa Tamres, Program Integrity Mgr./ 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

Marlene Fleming, 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
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Dominic Pagano, Office of Civil Rights
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Hope Rios,
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Jodie Berger, Regional Counsel
Legal Services of Northern California

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
Orange County Social Services Agency
Conducted on May 23 – May 26, 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

Cindy Guzman

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 Orange County Social Services Agency with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on May 23 – 26, 2011. An exit interview was held on May 27, 2011 to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Garden Grove Regional Center, County District Office	12912 Brookhurst Street Garden Grove, CA 92840	CalFresh	Spanish
Adult Services Main Office	1505 E. Warner Avenue Santa Ana, CA 92705	Adult Services	Spanish
West Region	6100 Chip Avenue Cypress, CA 90630	CalWORKS, WTW, CalFresh, Children's Family Services/ER	Vietnamese Spanish
Aliso Viejo Regional Center	115 Columbia, Aliso Viejo, CA 92656	CalFresh, Children's Family Services/ER	Spanish

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2011 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

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

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

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

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	9	5
Children Social Workers	2	1
Adult Program Workers	5	2
Receptionist/Screeners	3	3
Total	19	11

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	15
Non-English or limited-English speakers' case files reviewed	75
Languages of clients' cases	Spanish, Vietnamese, Korean, Farsi, Mandarin, American Sign Language.

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 access the county website to submit applications 24 hours Per day. They can also submit applications by telephone or by mail.
Does the county have extended hours to accommodate clients?			X	Aliso Viejo office hours are 7:00 a.m. – 5:30 p.m., Santa Ana office has working staff from 7:00 a.m. to 6:00 p.m., Workers can arrange field visits if necessary and meet clients at school and/or place f employment. Other

				offices (not at this time).
Can applicants access services when they cannot go to the office?	X			Applicants can access county website to submit applications 24 hrs. Per day. They can also submit application by phone or by mail.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Orange County continues to partner with Family Resource Centers through community partners and public. Additional information can be accessed via internet and the agency call center. Informal advertisements about Social Services are broadcasted on local radio-stations.

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, Ukranian, Vietnamese?	X			
If the PUB 13 is not displayed in all the languages available, is there a	X			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
poster that indicates that the Pub 13 is available in all 18 languages?				
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	X			All facilities reviewed had all of the alternate formats of the Pub 13 available ⁴ for clients in the reception area.
Were the current versions of the required posters present in the lobbies?	X			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			Orange County has done a good job at translating instructional and directional signs posted in places frequented by clients.

B. Corrective Actions

None

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

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

Contact the Civil Rights Bureau to receive the most recent versions, or download the Pub 13 from the CRB website http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

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

A. Findings and Corrective Actions

Facility Location: 12912 Brookhurst Street
Garden Grove, CA 92840

Facility Element	Findings	Corrective Action
Parking	The 4 Accessible Parking spaces in front of building are too short at 17'.	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p. 135
Men's Restroom	Door pressure too high (Front entrance from lobby too high at 8 lbs,	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b))

	back entrance from hallway too high at 10 lbs.	p. 201
--	--	--------

C. Facility Location: 1505 E. Warner Avenue
Santa Ana, CA 92705

Facility Element	Findings	Corrective Action
Parking	Clearance access aisle on passenger side of van space is blocked by a building structural column. (Van-Accessible parking space on left side of entrance). (REPEAT FINDING) Please see Picture (Fig. 1) below.	One in every 8 accessible spaces (p 136) and no less than 1 shall be served by an access aisle 96" wide minimum placed opposite the driver's side and shall be designated Van-Accessible. (CA T24 1129.B.3.2, ADA 4.1.2(5)(b)) p. 136
Men's Restroom	Door pressure too high at 8 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 201



(Fig. 1)

Recommendation: Due to structural column blocking access aisle on passenger side of Van-Accessible parking, it is recommended Van Accessible parking be moved to a space where there is room for the Van-Accessible access aisle.

E. Facility Location: 6100 Chip Avenue
Cypress, CA 90630

Facility Element	Findings	Corrective Action
Parking	<p>Six accessible parking spaces in front of building freestanding signs height is too low at 74" from bottom of sign to top of finish grade.</p> <p>Two accessible parking spaces across from the front of building are short at 8 ½ 'wide.</p>	<p>Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.4.1, ADA 4.6.5) p. 134</p> <p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p. 135</p>
Water fountain	Knee space from the floor is too low at 26".	The clear knee space between the bottom of the apron and the floor or ground not less than 27" in height, 30" in width, and 8" in depth. (CA T24 1117B.1.2, ADA 4.15.5(1)) p. 231
Women's Restroom	Door pressure too high at 7 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 201

G. Facility Location: 115 Columbia, Aliso Viejo, CA 92656

Facility Element	Findings	Corrective Action
Parking	Van Accessible space needs the additional symbol sign "Minimum Fine \$250.00".	For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol sign shall state

	<p>Van and Four accessible spaces freestanding signs height too low at 78", 78", 68" and 75".</p> <p>A van accessible access aisle is on the wrong side (the driver's side).</p> <p>Van-Accessible space is too short at 16 ½.</p>	<p>"Minimum Fine \$250.00." (CA T24 1129B.4.1) p. 133</p> <p>Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.4.1, ADA 4.6.5) p. 134</p> <p>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>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p 135</p>
Elevator	Elevator entrance not marked accessible.	Entrances that are accessible to and usable by persons with disabilities are identified with at least 1 International Symbol of Accessibility. Additional directional signs using the symbol are visible along approaching pedestrian ways. (CA T24 1117.B.5.8.1.2) p. 251
Public Pay Telephone	Public pay telephone is not equipped with volume control.	At least one in each telephone bank and a minimum of 25% of the total number of public telephones shall be equipped with a volume control and shall

		be hearing aid compatible. (CA T24 1117B.2.8, ADA 4.1.3.17(b)) p. 273
Men's Restroom	Door pressure too high at 18 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 201
Women's Restroom	Door pressure too high at 14 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 201

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			County identifies language upon first contact at reception.
Does the county use a primary language form?		X		
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Assigned bilingual workers are available for clients. Orange County has excellent bilingual services. Bilingual series appear to be provided for verbal communication.
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			Workers interviewed had knowledge of how to request bilingual staff if needed for interpretive services.
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			Staff interviewed is aware of the process to secure an interpreter.
Are county interpreters determined to be competent?	X			Human Resources certify bilingual staff through a process that tests verbal, reading and writing skills.

Question	Yes	No	Some-times	Comments
Does the county have adequate interpreter services?	X			Interpreter services are adequate for the threshold languages of Spanish and Vietnamese.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		All staff interviewed stated they would not use a minor to interpret.
Does the county allow the client to provide his or her own interpreter?	X			Staff stated it is rare that clients use their own interpreter since the county provides interpreters, however the county has developed the form "Certification of Confidentiality and Consent for Release of Information – Non-SSA Interpreter" to be signed by worker, client and their interpreter.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			The county has developed the form "Certification of Confidentiality and Consent for Release of Information – Non-SSA Interpreter" to be signed by worker, client and their interpreter. Signing this form acknowledges potential miscommunication by not using the county provided interpretive services. If the client-provided interpreter does not understand, bilingual staff or a county interpreter is then provided.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			
Is the information that is to be inserted into NOA translated into the client's	X			This was true based on the case file reviews.

Question	Yes	No	Some-times	Comments
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			
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			
Does the county offer screening for learning disabilities?	X			It is the policy of the Employment Services program WTW staff to always offer this screening.
Is there an established process for offering screening?	X			Offered at the WTW initial assessment/appraisal.
Is the client identified as having a learning disability referred for evaluation?				Referrals are made to other special programs, i.e. Behavioral Health and Department of Rehabilitation if appropriate.

B. Corrective Actions

None

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic

origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	ER referral, various documents, CWS-CMS narrative	SOC 341, SOC 426, SOC 295	SAWS-1, CalWIN Screen, WTW appraisal form, initial services case recording sheet.	SAWS-1, CalWIN
Primary language documentation	ER Intake forms, court reports, various documents, CWS-CMS, narrative.	Found in Language Assessment forms and narratives.	SAWS-1	SAWS-1. CalWIN, Intake Narrative.
Method of providing bilingual services and documentation	Good documentation on the provision of interpretive services found in narrative. Screener alert provided good information. One example of documentation showed both parents are deaf (child speaks English), ASL Interpreter accompanies Sr. Social Worker.	Consistently found Language Assessment forms and narratives.	In most cases, a bilingual worker is assigned. Found documentation on how bilingual services were met.	In most cases, a bilingual worker is assigned. Found documentation on how bilingual services were met.

Documented Item	Children's Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Client provided own interpreter	Good documentation on the provision of interpretive services found in narrative. (See Above)	Consistently found Language Assessment forms and narratives	In most cases, a bilingual worker is assigned. Found documentation on how bilingual services were met.	In most cases, a bilingual worker is assigned. Found documentation on how bilingual services were met.
Method to inform client of potential problem using own interpreter	None noted in sample case files reviewed.	Certification of Confidentiality/ Release of Information Non-SSA Interpreter used.	Assigned bilingual worker is used, however if client uses their own interpreter, it is told to them the potential problem using their own interpreter.	Assigned bilingual worker is used, however if client uses their own interpreter, it is told to them the potential problem using their own interpreter.
Release of information to Interpreter	None noted in sample case files reviewed.	Found Certification of Confidentiality/ Release of Information of Non-SSA Interpreter.	Found Certification of Confidentiality/ Release of Information of Non-SSA Interpreter.	Found Certification of Confidentiality/ Release of Information of Non-SSA Interpreter.
Individual's acceptance or refusal of written material offered in primary language	None noted in sample case files reviewed.	Adult Services Language Assessment Form.	None noted in sample case files reviewed.	Intake/Case Narrative
Documentation of minor used as interpreter	No sample of minor used as interpreter in case files reviewed.	No sample of minor used as interpreter in case files reviewed.	No sample of minor used as interpreter in case files reviewed.	No sample of minor used as interpreter in case files reviewed.
Documentation of circumstances for	No sample of minor used as	No sample of minor used as	No sample of minor used as	No sample of minor used as

Documented Item	Children's Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
using minor interpreter temporarily	interpreter in case files reviewed.	interpreter in case files reviewed.	interpreter in case files reviewed.	interpreter in case files reviewed.
Translated notice of actions (NOA) contain translated inserts	N/A	N/A for APS cases. Provided as needed for IHSS.	Provided as needed.	Provided as needed.
Method of identifying client's disability	Case Narrative.	Case Narrative.	Statement of Facts, Case Narrative.	DFA 285, Case Narrative.
Method of documenting a client's request for auxiliary aids and services.	Very good documentation in narrative by SW regarding provision of interpretive services in American Sign Language (ASL).	None noted in case file samples.	Noted in Narrative.	Noted in Narrative.

B. Corrective Actions

None

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
----------------------------	------------	-----------	-------------------	-----------------

Do employees receive continued Division 21 Training?	X			
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 employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions

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	X			

Interview and review areas	Yes	No	Some-times	Findings
personnel complaint?				
Did the employees know who the Civil Rights Coordinator is?	X			All workers state they know who the 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			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Corrective Action

None

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Orange County Social Services Agency Civil Rights Compliance Plan for the period April 30, 2011 through April 30, 2012, was received on March 24, 2011. It is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the Orange County Social Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Patty Figueredo, Civil Rights Coordinator, for organizing the details of the review. In each District Office, staff was very helpful with the facility reviews, case reviews

and computer assistance.

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

The Orange County Social Services Agency must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.

EMPLOYEE NAME	DATE	DATE(S) OF ABSENCE (show hours if applicable)
ELSA GARCIA	08/30/11	08/11/11 & , 8/12/11

Please deduct the following number of hours from applicable leave credit(s):

8	Vacation/Annual Leave	Dock
	Sick Leave (self)	AWOL
4	Family Sick Leave	Other Absence (e.g., jury duty, military) Explain below:
	Bereavement Leave	4 CTO
	Personal Holiday	
	Holiday Credit	
	CTO/Excess (circle one)	
	IHT (Informal Time taken)	
	Personal Leave	

Total Time Requested:	16	Days	2	Hours	16
-----------------------	-----------	------	----------	-------	-----------

Bureau Chief Approval	YES	NO

FAMILY MEDICAL LEAVE (FML)
<p>If this absence is related to a qualifying FML condition please indicated by checking below.</p> <p><input type="checkbox"/> Yes, this is related to my qualifying Family Medical Leave condition.</p>

EMPLOYEE NAME	DATE	DATE(S) OF ABSENCE (show hours if applicable)
ELSA GARCIA	08/30/11	08/11/11 & , 8/12/11

Please deduct the following number of hours from applicable leave credit(s):

8	Vacation/Annual Leave	Dock
	Sick Leave (self)	AWOL
4	Family Sick Leave	Other Absence (e.g., jury duty, military) Explain below:
	Bereavement Leave	4 CTO
	Personal Holiday	
	Holiday Credit	
	CTO/Excess (circle one)	
	IHT (Informal Time taken)	
	Personal Leave	

Total Time Requested:	16	Days	2	Hours	16
-----------------------	-----------	------	----------	-------	-----------

Bureau Chief Approval	YES	NO

FAMILY MEDICAL LEAVE (FML)

If this absence is related to a qualifying FML condition please indicated by checking below.

☐

Yes, this is related to my qualifying Family Medical Leave condition.