



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 5, 2011

Ms. Linda Haugan, Assistant County Administrator
San Bernardino County Human Services System
385 N. Arrowhead Drive, 5th Floor
San Bernardino, CA 92415-0140

Dear Ms. Haugan:

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 in June 2011. Enclosed is the final report on the review. We apologize for the delay.

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

We will provide a copy of our report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. Per the Governor's Executive Order S-08-09, all compliance reviews (and corresponding CAPs) performed after January 1, 2008, will be posted on the state's Reporting Government Transparency website.

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

Sincerely,

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

Enclosure

c: Denise Shefchik, Civil Rights Coordinator

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
SAN BERNARDINO COUNTY HUMAN SERVICES SYSTEM
Conducted June 2011**

**California Department of Social Services
Human Rights and Community Services Division**

Civil Rights Bureau

744 P Street, M.S. 8-16-70

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Reviewer

Daniel Cervantes

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the San Bernardino Human Services System 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 June 14 – 17, 2011. An exit interview was held on June 17, 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)
Rialto/Fontana DCFS	17621 W Foothill Blvd Fontana, CA 92335	Children's Services	Spanish
Rancho DAAS	9445 Fairway View Place, Ste. 110 Rancho Cucamonga, CA 91730	Adult Services	Spanish
Rancho Cucamonga ESP/TAD	10825 Arrow Blvd. Rancho Cucamonga, CA 91730	NAFS, CalFRESH, CalWORKS	Spanish
San Bernardino TAD	295 E 4 th Street San Bernardino, CA 92415	NAFS, CalFRESH, CalWORKS	Spanish

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2011-12 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	15	8
Children Social Workers	5	3
Adult Program Workers	4	2
Receptionist/Screeners	4	3
Total	28	16

All scheduled interviews were conducted.

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	12
Non-English or limited-English speakers' case files reviewed	55
Languages of clients' cases	English, Spanish, Hmong, Chinese, Tagalog, Arabic, & 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			Staff can make special appointments with clients as needed. IHSS staff allow for telephone applications. The TAD office visited allow for scheduled appointments between 7AM and 6PM
Does the county have extended hours to accommodate clients?	X			Please see above
Can applicants access services when they cannot go to the office?			X	The internet offers an array of services throughout the county. Further, applications are available online and Applicants can

				call different toll free numbers
Does the county ensure the awareness of available services for individuals in remote areas?			X	See Above Also, services are often advertised via radio, pamphlets, and other community outreach organizations.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)?	X			The pamphlet is an established part of the intake/redetermination process.
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			All facilities visited had current versions of the PUB 13.
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), audio cassette and Braille?	X			Receptionists at all facilities visited were well aware of these versions of the PUB 13 and were able to provide them upon request.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
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			

B. Corrective Actions

None required.

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: 17621 W Foothill Blvd

Facility Element	Findings	Corrective Action
Restroom	Men's: Door pressure excessive at 12lbs	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201
	Woman's: Door pressure excessive at 11lbs	

B. Recommendation

None

C. Facility Location: 9445 Fairway View Place

Facility Element	Findings	Corrective Action
Parking	Accessible space sign did not display \$250 min. fine sign	For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133
	The words NO PARKING not painted in access aisle	The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and

		unloading access aisle in white letters no smaller than 12". (CA T24 1129B.3.2) p 135
Exterior entrance	No sign at building's entrance designating ADA accessibility Door pressure (2 nd entrance door) excessive at 14 lbs	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.1) pp 186, 394 Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 201
Restroom	Men's: Door pressure excessive at 11 lbs Woman's: Door pressure excessive at 11 lbs	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201 Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201

D. Recommendation

None

E. Facility Location: 10825 Arrow Blvd

Facility Element	Findings	Corrective Action
Parking	Accessible space sign did not display \$250 min fine sign	For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol sign shall state

		"Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133
Client lobby	Door pressure (2 nd entrance door) excessive at 11 lbs each door	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201
Elevator	No sign on elevator designating wheelchair 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
Restroom: (1 st floor)	<p>Men's:</p> <p>Signage on door too low at 54 in</p> <p>Door pressure excessive at 9 lbs</p> <p>Soap dispenser too high at 42 in</p> <p>Woman's:</p> <p>Signage on door too low at 54 in</p>	<p>Door sign and wall sign shall be 60" above the floor to the center line of sign.</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201</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>Door sign and wall sign shall be 60" above the floor to the center line of sign.</p>

	<p>Door pressure excessive at 8 lbs</p> <p>Soap dispenser too high at 43 in</p> <p>Toilet tissue dispenser too far from front edge of toilet at 22 in</p>	<p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201</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>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301</p> <p>Toilet paper dispenser minimum height from floor is 19". (CA T24 1115B.8.4, ADA 4.16.6) pp 295, 301</p>
<p>Restroom: (2nd floor)</p>	<p>Men's:</p> <p>Signage on door too low at 54 in</p> <p>Signage on wall too low at 56 in</p> <p>Door pressure excessive at 14 lbs</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 28</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b))</p>

	<p>Toilet tissue too far from front edge of toilet at 23 in.</p> <p>Woman's:</p> <p>Signage on door too low at 54 in.</p> <p>Signage on wall too low at 56 in</p> <p>Door pressure excessive at 13 lbs.</p> <p>Toilet tissue too far from front edge of toilet at 24 in.</p>	<p>p 201</p> <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301</p> <p>Toilet paper dispenser minimum height from floor is 19". (CA T24 1115B.8.4, ADA 4.16.6) pp 295, 301</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 28</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201</p> <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301</p> <p>Toilet paper dispenser minimum height from floor is 19". (CA T24 1115B.8.4, ADA 4.16.6) pp 295, 301</p>
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	Toilet seat covers too high at 43 in	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
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F. Recommendation

This reviewer recommends that the blue/white sign on the pavement that depicts a wheelchair with occupant be repainted as it has faded over time

G. Facility Location: 295 E 4th street

Facility Element	Findings	Corrective Action
Elevator	No sign on elevator designating wheelchair 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
Restroom (1 st floor)	<p>Men's:</p> <p>Door pressure excessive at 15 lbs</p> <p>Paper towel dispenser too high at 42 in</p>	<p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201</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,</p>

	<p>Toilet tissue too far from front edge of toilet at 24 in.</p> <p>Woman's:</p> <p>Door pressure excessive at 16 lbs</p> <p>Paper towel dispenser too high at 46 in</p> <p>Domestic Violence Hotline card holder too high at 59 in.</p> <p>Toilet tissue too far from front edge of toilet at 24 in.</p>	<p>ADA 4.23.7) p 294</p> <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301</p> <p>Toilet paper dispenser minimum height from floor is 19". (CA T24 1115B.8.4, ADA 4.16.6) pp 295, 301</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201</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>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>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301</p>
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		Toilet paper dispenser minimum height from floor is 19". (CA T24 1115B.8.4, ADA 4.16.6) pp 295, 301
Restroom (2 nd floor)	<p>Men's:</p> <p>Door pressure excessive at 15 lbs</p> <p>Paper towel dispenser too high at 42 in.</p> <p>Toilet tissue too far from front edge of toilet at 24 in.</p> <p>Woman's:</p> <p>Door pressure excessive at 16 lbs.</p> <p>Paper towel dispenser too high at 46 in.</p>	<p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201</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>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301</p> <p>Toilet paper dispenser minimum height from floor is 19". (CA T24 1115B.8.4, ADA 4.16.6) pp 295, 301</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201</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</p>

	<p>Domestic Violence Hotline card holder too high at 59 in.</p> <p>Toilet tissue too far from front edge of toilet at 24 in.</p>	<p>of 40". (CA T24 1115B.8.3, ADA 4.23.7) p 294</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>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301</p> <p>Toilet paper dispenser minimum height from floor is 19". (CA T24 1115B.8.4, ADA 4.16.6) pp 295, 301</p>
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H. Recommendation

This reviewer recommends designating 1 computer in the job search room as wheelchair accessible as to avoid having every computer station meet the minimum ADA standards.

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			Each facility visited was staffed with a bilingual receptionist. Further, all staff were aware of the I SPEAK card and when to use it.
Does the county use a primary language form?		X		All initial processes are fully automated.
Does the client self-declare on this form?				N/A
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Much of the county staff are certified bilingual workers. When a bilingual worker was not available, there was no delay in providing services found.
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		San Bernardino County does an excellent job in providing translation services without delay .
Is there a delay in providing services?		X		Please see above.

Question	Yes	No	Some-times	Comments
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			All bilingual employees are certified by the county.
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?		X		
Does the county allow the client to provide his or her own interpreter?	X*			<p>Clients are allowed to use their own interpreter after they have been informed of the free interpretive services provided by the county.</p> <p>*When a client decides to use their own interpreter, Div 21 - 116.24 states that a "consent for the release of information" shall be obtained. This documentation was not found in the case files.</p>
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	MOST of the time. There were isolated instances where the client received forms in English after they designed Spanish as

Question	Yes	No	Some-times	Comments
				their preference.
Is the information that is to be inserted into NOA translated into the client's primary language?			X	MOST of the time. Specifically, there was a case file at the Rancho Cucamonga TAD in which the client designated Spanish as their primary language. The notice was sent to the client (overpayment) in Spanish, but the reason for overpayment was delivered in English.
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			If/when a learning disability is uncovered, county staff assist the client however they need help. Same for clients who cannot read/write.
Does the county offer screening for learning disabilities?	X			The offer is made as part of the initial assessment process in CaWORKs employment services.
Is there an established process for offering screening?	X			

Question	Yes	No	Some-times	Comments
Is the client identified as having a learning disability referred for evaluation?	X			Further testing and evaluation is provided when necessary.

B. Corrective Actions

Area of Findings	Corrective Actions
Written Materials	San Bernardino County must use and provide translated forms, to include translated notice of action forms, in the clients' primary languages when translated by CDSS. Div. 21-115.2
Notices of Action	When San Bernardino County uses translated forms and materials, such as notices of actions that contain spaces in which the county must insert information for the client, such information must be in the primary language of the client. Div. 21-115.2

C. Recommendation

None.

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	Initial ER Form	SOC 295	SAWS 1, C-IV	SAWS 1, C-IV
Primary language documentation	Initial ER Form	SOC 295	SAWS 1, C-IV	SAWS 1, C-IV
Method of providing bilingual services and documentation	In most cases, the worker was able to provide interpretive services Documentation occurs in the case narrative	Case narrative	C-IV	C-IV
Client provided own interpreter	Case narrative	Case narrative	Case narrative	Case narrative
Method to inform client of potential problem using own interpreter	None found	None found	None found	None found
Release of information to Interpreter	None found	None found	None found	None found
Individual's acceptance or refusal of written material offered in primary language	None found	None found	C-IV	C-IV
Documentation of minor used as interpreter	None found	None found	None found	None found
Documentation of circumstances for	N/A	N/A	N/A	N/A

Documented Item	Children's Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
using minor interpreter temporarily				
Translated notice of actions (NOA) contain translated inserts	N/A	Workers provide inserts when necessary	None found	None found
Method of identifying client's disability	Case narrative (if applicable)	Case narrative (if applicable)	Case narrative (if applicable)	Case narrative (if applicable)
Method of documenting a client's request for auxiliary aids and services	Case narrative (if applicable)	Case narrative (if applicable)	Case narrative (if applicable)	Case narrative (if applicable)

B. Corrective Actions

Areas of Action	Corrective Action
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22

C. Recommendation

None

VII. STAFF DEVELOPMENT AND TRAINING

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

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			Civil rights coordinator does an exceptional job in keeping county staff current with trainings
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.

C. Recommendation

None.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			County staff were well informed of the different types of complaints and how to handle each
Did the employees know who the Civil Rights Coordinator is?	X			Civil rights coordinator does very well in promoting civil rights within the county
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			The complaint log has been reconciled against the database of complaints maintained by Civil Rights. No discrepancies were found.

B. Corrective Action

None

C. Recommendation

None

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The San Bernardino County Human Services System's Civil Rights Plan update for 2010-2011 was received and is approved as submitted.

X. CONCLUSION

The CDSS reviewer found San Bernardino Human Services System staff warm, welcoming, informative, and very supportive. Particular thanks to Denise Shefchik, Civil Rights Coordinator, for organizing the details of the review, and to all other staff involved including facility managers, who assisted in each of the facility reviews. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found San Bernardino County 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.

San Bernardino County 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.