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DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

November 23, 2011

Paul Lake, Acting Director
Sacramento County Department of Human Assistance
2433 Marconi Avenue
Sacramento, CA 95821

Dear Mr. Lake:

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 August 16-18, 2011. Enclosed is the final report on the review. We apologize for the delay.

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

We will provide a copy of our report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well.

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: Mary Shuba, Civil Rights Coordinator

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

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
SACRAMENTO COUNTY
DEPARTMENT OF HUMAN ASSISTANCE
Conducted on August 16-18, 2011**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
Sacramento, CA 95814
(916) 654-2107**

Reviewer

Claudia Cabrera

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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 Sacramento County Department of Human Assistance 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 August 16-18, 2011. An exit interview was held on August 18, 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) |
|--|---|--|---|
| Sacramento County DHA, Rancho Cordova | 10013 Folsom, Suite 1 Sacramento, CA | CalWORKs (Cash Aid/Employment), CalFresh | Spanish, Russian, Armenian |
| Sacramento County DHA, Galt | 257 South Lincoln Way Galt, CA | CalWORKs(Cash Aid/Employment), CalFresh | Spanish |
| Sacramento County DHA, Fulton Bureau | 2700 Fulton Avenue Sacramento, CA | CalWORKs (Cash Aid/Employment) | Spanish, Russian |
| Sacramento County DHA, North Highlands | 5747 Watt Avenue Sacramento, CA | CalWORKs (Cash Aid/Employment) | Spanish, Russia |

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 | 6 |
| Receptionist/Screeners | 3 | 2 |
| Total | 12 | 8 |

Program Manager Surveys

| | |
|-------------------------------|---|
| Number of surveys distributed | 4 |
| Number of surveys received | 4 |

Reviewed Case Files

| | |
|--|---|
| English speakers' case files reviewed | 3 |
| Non-English or limited-English speakers' case files reviewed | 40 |
| Languages of clients' cases | Hindi, Hmong, Punjabi, Spanish, Cantonese, Russian, Farsi, Vietnamese, Arabic, ASL, Armenian, |

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 | Comments |
|--|------------|-----------|---|
| Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in? | X | | Clients can apply online, Cal Fresh application intake can be done over the phone, and workers will see clients during their lunch break or accommodate appointments after hours. Clients may also drop off application in the "drop-off" boxes located outside of each office. |
| Does the county have extended hours to accommodate clients? | | X | With supervisor approval, workers can accommodate clients after the normal business hours which are from 7:30 am-4:30pm. |
| Can applicants access services when they cannot go to the office? | X | | Clients can apply online, arrangements can be made to do home visits and clients may also submit applications via e mail. |
| Does the county ensure the awareness of available services for individuals in remote areas? | X | | |

| Signage, posters, pamphlets | Yes | No | Comments |
|---|------------|-----------|--|
| Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)? | X | | PUB 13 is part of the application packet. |
| Is the pamphlet distributed and explained to each client at intake and re-certification? | X | | PUB 13 is given to clients during intake, renewal/recertification and workers explain the process for requesting a state hearing, what services are available such as special skills workers for interpretive services and accommodations. |
| 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, and Vietnamese? | X | | The Watt Ave office had this tall tower displaying all copies of the PUB 13. Great Idea! |
| 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 | Copies of the PUB 13 are printed in the threshold languages; Spanish, Russian, and Armenian. Receptionist staff have a bookmark on their computers to quickly access copies of the PUB 13 in additional languages. |
| Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille? | | X | The Fulton Ave office did not have copies of the PUB 13 Braille or Audio available. The large print was also not available because the current procedure is to request these copies from Bernard Ivey, Clerical Supervisor. All other offices reviewed had these materials available at the reception desk. |
| 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 | | X | Two of the 12 staff interviewed did not know the location of the |

| Signage, posters, pamphlets | Yes | No | Comments |
|---|------------|-----------|---|
| Rights Coordinator's name and address? | | | PUB 86 poster with the civil rights coordinator's name on it. |
| Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages? | X | | |

B. Corrective Actions

| Informational Element | Corrective Action Required |
|------------------------------|--|
| Translated Pub 13 | Sacramento County DHA shall ensure that the current version of the Pub 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language. Div. 21-115.2 |
| Auxiliary aids | Sacramento County DHA shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.4 |

C. Recommendation

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" | 06/11 |
| Pub 86 | "Everyone is Different, but Equal Under the Law" | 03/07 |
| Form AD 475B | "And Justice for All" | 12/99 |

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

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

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

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

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

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

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

A. Findings and Corrective Actions

Facility Location: 10013 Folsom Blvd

| Facility Element | Findings | Corrective Action |
|-------------------------|--|--|
| Exterior entrance | <p>Door Pressure</p> <p>Walking into the building:</p> <p>Double doors on the left are excessive with the left door measuring 15lbs and the right door measuring 11lbs.</p> <p>Double doors on the right are excessive with both doors</p> | <p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</p> |

| | | |
|--------------|--|---|
| | measuring 12lbs each. | |
| Client lobby | <p>Door Pressure</p> <p>Double doors walking into the lobby are excessive, both measuring 10lbs each.</p> <p>Designated accessible counter at window is low at 22 ½”.</p> | <p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</p> <p>Height of accessible tables or counters is between 28” – 34” from floor finish. (CA T24 1122B.4, ADA 4.32.4) p 388</p> |
| Restroom | <p>Men’s Restroom:</p> <p>First Door:</p> <p>Door pressure is excessive at 11lbs.</p> <p>Second Door:</p> <p>Door pressure is excessive at 12lbs.</p> <p>Soap dispenser is high at 43”.</p> <p>Women’s Restroom:</p> <p>First Door:</p> <p>Door pressure is excessive at 10 lbs.</p> | <p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</p> <p>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>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24</p> |

| | | |
|--|---|---|
| | <p>Second Door:</p> <p>Door pressure is excessive at 9 lbs.</p> <p>Soap dispenser is high at 47 ½".</p> | <p>1133B.2.5, ADA 4.13.11(2)(a) & (b) p 207</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> |
|--|---|---|

B. Recommendation

None

C. Facility Location: 5747 Watt Ave

| Facility Element | Findings | Corrective Action |
|-------------------------|---|---|
| Parking | There is no "Minimum Fine \$250.00" sign posted below the accessible symbol 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 |
| Telephone | The Public Pay Telephone does not have a volume control. | <p>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</p> <p>Telephones with volume control shall be hearing aid compatible and identified with a sign. (CA T24 1117B.2.8 &</p> |

| | | |
|----------|---|---|
| | | 1117B.5.8.3, ADA 4.1.3.17(b)) p 273 |
| Restroom | <p>Men's Restroom:</p> <p>Door pressure is excessive at 15 lbs.</p> <p>Women's Restroom:</p> <p>Door pressure is excessive at 20 lbs.</p> | <p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</p> <p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</p> |

D. Recommendation

None

E. Facility Location: 2700 Fulton Ave

| Facility Element | Findings | Corrective Action |
|------------------|--|--|
| Parking | <p>There is no "Minimum Fine \$250.00" sign posted below the accessible symbol sign.</p> <p>The words "No Parking" are faded and need to be repainted.</p> | <p>For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133</p> <p>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</p> |
| Restroom | <p>Men's Restroom:</p> <p>Toilet tissue dispenser is located too far from the front edge of the toilet at 20".</p> | <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat.</p> |

| | | |
|--|---|--|
| | <p>Women's Restroom:</p> <p>Toilet tissue dispenser is located too far from the front edge of the toilet at 20".</p> | <p>(CA T24 1115B.8.4) pp 295, 301</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> |
|--|---|--|

F. Recommendation

None

G. Facility Location: 257 South Lincoln Way, Galt

| Facility Element | Findings | Corrective Action |
|-------------------|--|--|
| Exterior entrance | Door pressure is excessive at 15 lbs. | Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207 |
| Restroom | <p>Men's Restroom:</p> <p>Sign on wall is low at 54".</p> | <p>Door sign and wall sign shall be 60" above the floor to the center line of sign.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 281</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 282</p> |

| | | |
|--|---|---|
| | <p>Door pressure is excessive at 10 lbs.</p> <p>Women's Restroom:</p> <p>Sign on wall is low at 54".</p> | <p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</p> <p>Door sign and wall sign shall be 60" above the floor to the center line of sign.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 281</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 282</p> |
| | <p>Door pressure is excessive at 10 lbs.</p> | <p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</p> |

H. Recommendation

Note: There are no interview rooms. Workers interview clients in their office. If accessible rooms are needed, workers will take clients to their multi-purpose conference room where there are tables and chairs that can easily be re-arranged.

When being escorted to this multi-purpose conference room, the reviewer noticed that there is a large cabinet located in the isle leading to this conference room. Walking down this hall with the cabinet in the way only leaves a 28 ½" pathway. Clear width, minimum

clearance of a point is 32" (CA T24 1133B.1.1.1.1, ADA 4.13.5 and CA T24 1118B.1, ADA 4.21) pp197, 235. Although there is an alternate route to this room, it is advised to move this cabinet to another area allowing for a much wider path through the hallway.

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 | Comments |
|--|------------|-----------|---|
| Does the county identify a client's language need upon first contact? How? | X | | At the reception desk, staff use a language identification card from Language Line. All application packets include form SC 106, Primary Language Designation. |
| Does the county use a primary language form? | X | | SC 106, Primary Language Designation Form. |
| Does the client self-declare on this form? | X | | Client fills out form. |
| Are non-English- or limited- English-speaking | X | | There are Bilingual Special Skills Workers available to interpret. |

| Question | Yes | No | Comments |
|--|-----|----|--|
| clients provided bilingual services? | | | |
| 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 | | If a Special Skills Worker is not available, staff will use an interpreter through the various providers the county contracts with, such as CTS Interpreters, Language Link, Carmazzi, and Pacific Interpreters. |
| Is there a delay in providing services? | | X | No delay in providing interpretive services. |
| Does the county have a language line provider, a county interpreter list, or any other interpreter process? | X | | The county has several language line providers, such as CTS Interpreters, Language Link, Carmazzi, and Pacific Interpreters. They also have a county interpreter list for bilingual Special Skills Workers. |
| Are county interpreters determined to be competent? | X | | All county interpreters are certified. |
| Does the county have adequate interpreter services? | X | | The county provides interpretive services through its various language line providers as well as through their Special Skills Workers. |
| Does the county allow minors to be interpreters? If so, under what circumstances? | X | | Only in an emergency and under an extenuating circumstance, workers will use a minor to relay basic information. |
| Does the county allow the client to provide his or her own interpreter? | X | | Clients must fill out SC 106 to identify their preference for using their own interpreter. |
| Does the county ensure that the client-provided interpreter understands what is being interpreted for the client? | X | | Workers pay close attention to the client provided interpreter and the client for signs of confusion. If worker feels the client provided interpreter is not providing adequate interpreting, worker will request a county interpreter to be used instead. |
| 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 primary language? | X | | |

| Question | Yes | No | Comments |
|--|-----|----|--|
| 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 | | For a client with a hearing impairment, workers will use an ASL interpreter, through Norcal, Class Act Alliance or Show of Hands. They will also communicate by writing back and forth. For a client with a visual impairment, workers will assist by providing Braille, reading out loud, helping the client fill out forms by signing with an "x" or requesting an HAS Special Skills Worker to provide assistance. |
| Does the county identify and assist the client who has learning disabilities or a client who cannot read or write? | X | | Screening tool, WTW 18, is used to identify a client's learning disability. If it is determined that the client has a learning disability, they are referred to a Vocational Counselor for further assistance. If a client cannot read, workers will read out loud to them and help them fill out paperwork. It is then noted in case comments that the worker assisted the client in filling out paperwork. |
| Does the county offer screening for learning disabilities? | X | | Screening tool, WTW 18, is used to identify a clients learning disability. If it is determined that the client has a learning disability, they are referred to a Vocational Counselor for further assistance. |
| Is there an established process for offering screening? | X | | |
| Is the client identified as having a learning disability referred for evaluation? | X | | Clients are referred to a Vocational Counselor for further evaluation. |

B. Corrective Actions

| Area of Findings | Corrective Actions |
|------------------|---|
| Use of Minors | Sacramento County DHA shall only allow the use of a minor (under the age of 18 years) to temporarily act as an interpreter under extenuating circumstances or at the specific request of the applicant/recipient. |

| Area of Findings | Corrective Actions |
|------------------|--------------------|
| | Div. 21-115.16 |

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 | CalWORKs & Employment Services | Non-Assistance CalFresh |
|--|--|--|
| Ethnic origin documentation | DFA 285, SAWS I, CalWin Demographics and Case Summary Page | DFA 285, SAWS I, CalWin Demographics and Case Summary Page |
| Primary language documentation | DFA 285, SAWS I, CalWin Demographics and Case Summary Page | DFA 285, SAWS I, CalWin Demographics and Case Summary Page |
| Method of providing bilingual services and documentation | SC 106, Primary Language Designation Form | SC 106, Primary Language Designation Form |
| Client provided own interpreter | None found in cases reviewed | None found in cases reviewed |
| Method to inform client of potential problem using own interpreter | SC 106, Primary Language Designation Form | SC 106, Primary Language Designation Form |
| Release of information to Interpreter | None found in cases reviewed | None found in cases reviewed |
| Individual's acceptance or refusal of written material offered in primary language | SC 106, Primary Language Designation Form | SC 106, Primary Language Designation Form |
| Documentation of minor used as interpreter | CalWin Case Comments | CalWin Case Comments |
| Documentation of circumstances for | CalWin Case Comments | CalWin Case Comments |

| Documented Item | CalWORKs & Employment Services | Non-Assistance CalFresh |
|--|--------------------------------|-------------------------|
| using minor interpreter temporarily | | |
| Translated notice of actions (NOA) contain translated inserts | CalWin Correspondence | CalWin Correspondence |
| Method of identifying client's disability | SOF | SOF |
| Method of documenting a client's request for auxiliary aids and services | CalWin Case Comments | CalWin Case Comments |

B. Corrective Actions

| Areas of Action | Corrective Action |
|--|--|
| Temporary use of a minor (under 18 years of age) as an interpreter | <p>When a minor (under 18 years of age) is used as an interpreter, the CWD shall so document the circumstances requiring <u>temporary use</u> of minors in the case record. Div. 21-116.22</p> <p>Only under extenuating circumstances or at the specific request of the applicant/recipient shall a CWD allow a minor (under the age of 18 years) to temporarily act as an interpreter.</p> |
| Documentation of interpreter signed confidentiality statement | <p>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</p> |
| Documentation that bilingual services were provided | <p>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</p> |
| General | <p>Sacramento County DHA must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116</p> |

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 | Comments |
|---|-----|----|--|
| Do employees receive continued Division 21 Training? | X | | Division 21 training is included with the civil rights training. This training is offered annually. |
| Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint? | X | | All staff interviewed were able to clearly identify the procedure for filing a discrimination complaint. |
| Does the county provide employees Cultural Awareness Training? | X | | Cultural Awareness training is included with the civil rights training. |
| 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 | Findings |
|---|-----|----|--|
| Can the employees easily identify the difference between a program, discrimination, and a personnel complaint? | | X | Six of the 12 staff interviewed could not clearly identify the difference between a program and personnel complaint. |
| Did the employees know who the Civil Rights Coordinator is? | X | | All staff interviewed correctly identified Mary Shuba as the civil rights coordinator. |
| Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint? | | X | Two of the 12 staff interviewed did not know the location of the PUB 86 poster with the civil rights coordinator's name on it. |
| When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date? | X | | |

B. Corrective Action

| Element | Corrective Action |
|--------------------------|--|
| Discrimination Process | Sacramento County DHA shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203 |
| Civil Rights Coordinator | Sacramento County DHA shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Div. 21-117 and 21-107.21 |

C. Recommendation

None

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Sacramento County Department of Human Assistance, Civil Rights Compliance Plan for 2011 was received on 6/17/2011. It is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the Sacramento County Department of Human Assistance staff warm, welcoming, informative and very supportive. Particular thanks to Mary Shuba, Civil Rights Coordinator, for organizing the details of the review. In each Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Sacramento County Department of Human Assistance 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 Sacramento County Department of Human Assistance 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.