



CDSS

WILL LIGHTBOURNE
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

March 12, 2012

Ms. Carol Roberts, Director
Sierra County Department of Human Services
P.O. Box 1019
Loyalton, CA 96118

Dear Ms. Roberts:

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 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: Jean Fletcher, 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

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

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
Sierra County Health and Human Services
Conducted on August 23, 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

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 Sierra County Health and Human Services 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 24, 2011. An exit interview was held the afternoon of August 24, 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)
Sierra County Health and Human Services	22 Maiden Lane, Downieville, CA	WTW, CalFresh, IHSS	None
Sierra County Health and Human Services	202 Front Street, Loyalton, CA	WTW, CalFresh, Children's Services	None

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	2	
Children Social Workers	1	
Adult Program Workers	1	
Receptionist/Screeners	1	
Total	5	0

Reviewed Case Files

English speakers' case files reviewed	10
Non-English or limited-English speakers' case files reviewed	2
Languages of clients' cases	Spanish, Russian

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		<p>Upon requests and with prior approval from the supervisor, workers can schedule an appointment before or after hours. Some workers will also meet with clients during their lunch hour.</p> <p>Both offices reviewed had applications available in an "Outbox" located outside of the office where clients can either pick up an application or drop it inside of the drop-box.</p>
Does the county have extended hours to accommodate clients?		X	Normal office hours are M-F 8:00 am-5:00 pm.
Can applicants access services when they cannot go to the office?	X		<p>Phone interviews and home visits can be scheduled with prior approval. Clients may also submit applications via online thru "see-for-yourself."</p> <p>Clients who are unable to access county services due to lack of transportation may request home visits or transportation may be provided by the department.</p>
Does the county ensure the awareness of available services for individuals in remote areas?		X	<p>Staff interviewed were unaware of ways the county ensures the awareness of available services for individuals in remote areas.</p> <p>According to the 2011 CRCP, "word of mouth" is the primary method of disseminating county information. Sierra does not</p>

			currently have any local radio or television stations and the two newspapers published are available in English only.
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Signage, posters, pamphlets	Yes	No	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)?	X		The PUB 13 is included in the application packet and reviewed over the phone or during the face to face interview, renewals, and initial interview.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X		See above.
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 poster that indicates that the Pub 13 is available in all 18 languages?		X	PUB 13 was displayed in all available languages.
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?		X	The Loyalton Office did not have the PUB 13 audio.
Were the current versions of the required posters present in the lobbies?	X		Both offices reviewed had the current posters posted in the lobby.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X		All staff interviewed were able to identify Jean Newfarmer-Fletcher as the CRC.
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		There are no threshold languages.

B. Corrective Actions

Informational Element	Corrective Action Required
Auxiliary aids	Sierra County 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: 22 Maiden Lane, Downieville, CA

Facility Element	Findings	Corrective Action
Parking	<p>There is no assigned parking. Parking available is shared with neighboring businesses.</p> <p>There is no "van accessible" parking space.</p> <p>There is no additional "minimum fine \$250.00" sign below symbol sign.</p>	<p>Note: clients can park in the employee parking lot located at the back of the building.</p> <p>Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p 133</p> <p>One in every 8 <i>accessible</i> spaces (no fewer than 1) shall be designated van accessible. (CA T24 1129B.3.2, ADA 4.1.2(5)(b)) p 136</p> <p>For both posted and wall-mounted signage, additional language on symbol sign and</p>

	<p>Length of parking space is short at 10'.</p> <p>There is no access aisle.</p>	<p>an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133</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> <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>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</p>
Route to Alternate Entrance	<p>Route to main door is narrow at 42".</p> <p>Handrail is mounted low at 32 ¼".</p>	<p>Walks and sidewalks subject to these regulations shall have a continuous surface, not interrupted by steps or by abrupt changes in level exceeding ½ inch and shall be a minimum of 48" in width. Surfaces shall be slip resistant. (CA T24 1133B.7.1, ADA 4.3.8) p 163</p> <p>Handrail is mounted 34" to 38" above ramp. (CA T24 1133B.5.5.1, ADA 4.8.5(5)) p 146</p>

	<p>Width of ramp is narrow at 42".</p> <p>Door pressure is excessive at 10lbs.</p>	<p>The width of ramps is as required for stairways and exits. Pedestrian ramps have a minimum width of 48". (CA T24 1133B.5.2.) p 144</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>
Client Lobby	No place to park wheelchair.	The minimum clear floor or ground space is required to accommodate a single, stationary wheelchair and occupant is 30" x 48". (CA T24 1118B.4.1) p 210
Unisex Restroom	<p>There is no accessible sign on the door.</p> <p>There is no adequate turning space. The C-IV tower housed in the restroom does not allow for a 60" minimum turnaround.</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>There shall be a 36" minimum t-shaped traffic way. (CA T24 1118B.3, ADA 4.2.3) p 236</p> <p>There shall be a 60" minimum circular turning diameter. (CA</p>

	Space in front of sink is short at 30"x42".	T24 1118B.3, ADA 4.2.3) p 236 A clear floor space of 30" by 48" is provided with clear floor space and an accessible route. (CA T24 1115B.4.7.1, ADA 4.24.5) p 342
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B. Recommendation

The client lobby is extremely small and does not have enough room for a person in a wheelchair to park their chair. It was noted that because clients normally enter through the back door, they are escorted to the common area which is spacious enough for a person to park their wheelchair. Due to the fact that this office does not usually have many clients visit the office, this has not posed a problem.

A. Facility Location: 202 Front Street, Loyalton

Facility Element	Findings	Corrective Action
Parking	There is no "unauthorized parking" sign at entrance to off-street accessible parking.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p 133
	There is no additional "minimum fine \$250.00" sign posted below the 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

	<p>Right to left: Freestanding sign #1 low at 65 ¾”.</p> <p>Freestanding sign #2 low at 63.”</p> <p>Van-accessible space measured 8’ wide and 17’ long.</p>	<p>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>Length of parking space shall be at least 18’ long, 9’ wide. (CA T24 1129B.3.1, ADA 4.6.3) p 135</p>
Men’s Restroom	<p>Sign on door is high at 64 ½”.</p> <p>Door pressure is excessive at 11 lbs.</p> <p>Accessible urinal is high at 18 ½”.</p> <p>Toilet tissue dispenser is located far at 28”.</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>Rim height shall be a maximum of 17” in height above the floor. (CA T24 1115B.4.2.1) p 285</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>
Women’s Restroom	<p>Sign on door is high at 65”.</p> <p>Toilet tissue dispenser is located far at 28”.</p>	<p>Door sign and wall sign shall be 60” above the floor to the center line of sign.</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>

B. Recommendation

Accessible parking is located at the back of the building with employee parking. There is no safe accessible path of travel as clients are required to cross the parking lot then walk behind parked cars located on the side of the building to access the main entrance. Persons with disabilities shall not be forced to go behind parked cars except their own (CA

T24 1129B.3.3) (*hardship exception, p 134*). The access aisles (load and unload) must connect to the accessible path of travel, including curb cuts or ramps as needed (CA T24 1129B.3.3, ADA 4.6.3) p 135.

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		"I speak" cards are given to clients to identify their language. They are also given a Primary Language Form to self identify their preferred language.
Does the county use a primary language form?	X		Primary Language Form.
Does the client self-declare on this form?	X		Client fills out form.
Are non-English- or limited- English-speaking clients provided bilingual services?	X		Eliza Jacquez, a Spanish bilingual independent interpreter volunteers to provide interpretive services when needed. Over the phone interpretation is also

Question	Yes	No	Comments
			available through ATT.
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 will call Jean Fletcher, CRC, to request an interpreter or use ATT. Children's Services will schedule for an interpreter to come to a home visit for planned appointments.
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		Eliza Jacquez, Spanish-speaking volunteer and ATT, over the phone interpretation.
Are county interpreters determined to be competent?	X		
Does the county have adequate interpreter services?	X		
Does the county allow minors to be interpreters? If so, under what circumstances?	X		IHSS will allow at times, not for fraud or CPS, but will use for general questions. The use of a minor will be documented in case notes.
Does the county allow the client to provide his or her own interpreter?	X		Two of the staff interviewed were not sure what the county policy is when a client chooses to use their own interpreter. All other staff indicated that clients can choose to use their own interpreter and that they must also sign a confidentiality form.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X		Workers will pay close attention to the client provided interpreter and look for signs that may indicate problems with translation, such as long pauses.
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		

Question	Yes	No	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		Staff stated that they would read forms out loud, and assist in filling out paperwork for clients who have a visual impairment. For clients who have a hearing impairment staff will write back and forth, or request an ASL interpreter. This would be documented in the client's case file and case comments. The case file will also include a tag identifying accommodation.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X		Staff interviewed indicated that they would explain and read materials out loud, assist filling out forms and have a witness present when providing assistance to a client who cannot read or write.
Does the county offer screening for learning disabilities?		X	Staff were unaware of the screening process for learning disabilities.
Is there an established process for offering screening?		X	
Is the client identified as having a learning disability referred for evaluation?		X	

B. Corrective Actions

Area of Findings	Corrective Actions
Use of Minors	Sierra County 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. Div. 21-115.16
Auxiliary Aids	Sierra County shall ensure the availability of auxiliary aids and services to persons who are deaf or hearing impaired, or persons with impaired speech, vision or manual skills where necessary to afford such persons an equal opportunity to access program services. Div 21-115.41

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	IHSS	CaWORKs	CaFresh
Ethnic origin documentation	CMS-CWS ID Page	SOC 295	SAWS I	SAWS I, DFA 285
Primary language documentation	Primary Language Form	SOC 295	C-IV Case Summary Page	C-IV Case Summary Page
Method of providing bilingual services and documentation	Primary Language Form	None found in cases reviewed	Primary Language Form	Primary Language Form
Client provided own interpreter	None found in cases reviewed	None found in cases reviewed	C-IV Journal	None found in cases reviewed
Method to inform client of potential problem using own interpreter	None found in cases reviewed	None found in cases reviewed	None found in case reviewed	None found in cases reviewed
Release of information to Interpreter	None found in cases reviewed	None found in cases reviewed	None found in case reviewed	None found in cases reviewed
Individual's acceptance or refusal of written material offered in primary language	None found in cases reviewed	None found in cases reviewed	C-IV Journal	C-IV Journal
Documentation of minor used as interpreter	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed
Documentation of circumstances for using minor	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed

Documented Item	Children's Services	IHSS	CalWORKs	CalFresh
interpreter temporarily				
Translated notice of actions (NOA) contain translated inserts	None found in cases reviewed	None found in cases reviewed	Case file	Case file
Method of identifying client's disability	No form currently available to identify client's disability	IHSS Assessment Sheet	C-IV Journal	SOF
Method of documenting a client's request for auxiliary aids and services	None found in cases reviewed	IHSS Assessment Sheet	C-IV Journal	SOF

B. Corrective Actions

Areas of Action	Corrective Action
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23
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

Review of one of the Children Service's case showed that the child had possible Indian Ancestry and it was noted in C-IV, under the "ICWA Eligibility" tab that verification was pending. This is a great way of tracking and following up with a child who could possibly pertain to a tribe. Keep up this good practice!

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		DIV 21 training is provided annually.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X		Most staff interviewed stated understood the county's policy and procedure for filing a discrimination complaint. It is common practice to refer all complaints to either Jean Fletcher or their supervisor.
Does the county provide employees Cultural Awareness Training?	X		Culture Awareness training is provided either by UC Davis or through a community academy.
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?		X	One staff stated that they have not had any MEPA training through the county but had experience and was familiar with MEPA from prior job.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X		

B. Corrective Actions

Training Area	Corrective Action
MEPA Training for Children's Social Workers	Sierra County shall ensure that CSW's receive MEPA training to ensure that public contact staff has knowledge of, and properly apply the placement prohibitions contained in MEPA. 42 U.S.C. 672, 674, and 1996(b)

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	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X		All staff interviewed were able to identify the differences between a program, discrimination and personnel complaints.
Did the employees know who the Civil Rights Coordinator is?	X		All staff stated Jean Fletcher was the CRC.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X		Posted in lobby.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X		No complaints filed in 2011.

B. Corrective Action

None.

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Sierra County Health and Human Services Civil Rights Compliance Plan for 2011 was received on July 21, 2011. It is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the Sierra County Health and Human Services staff warm, welcoming, informative and very supportive. Particular thanks to Ms. Jean Fletcher, 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 Sierra County Health and Human Services to have a significant number of compliance issues. The 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.