



CDSS

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

August 2, 2012

Susan Loew, Director
Riverside County Department of
Public Social Services
4060 County Circle Drive
Riverside, CA 92503

Dear Ms. Loew:

This letter is to advise you that the Corrective Action Plan you submitted in response to the results of our April 18-21, 2011 Civil Rights Compliance Review is approved.

We will be monitoring the implementation of your corrective action items through your Civil Rights Coordinator.

If you have any questions, please contact Cindy Guzman at (916) 654-2117. You may also contact your her by e-mail at Cindy.Guzman@dss.ca.gov.

Sincerely,

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

c: Hilary Brown, Civil Rights Coordinator

Linda Patterson, Branch Chief
CDSS CalFresh Program

Mike Papin, Chief
CalFresh Policy Bureau

Marlene Fleming, Chief
Field Operations Bureau

Brian Tam, Chief
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Joe Torres, Office of Civil Rights
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Hope Rios,
USDA Food and Nutrition Services
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Western Region

Jodie Berger, Regional Counsel
Legal Services of Northern California

**RIVERSIDE COUNTY
DEPARTMENT OF PUBLIC SOCIAL SERVICES**

CORRECTIVE ACTION PLAN

**FOR
CIVIL RIGHTS
COMPLIANCE REVIEW CONDUCTED
April 18 -21, 2011**

Riverside County Department of Public Social Services
Human Resources/Administrative Compliance Services
10281 Kidd Street
Riverside, California 92503
(951) 358-3030

Riverside County
Department of Public Social Services
Corrective Action Plan

I. INTRODUCTION

The California Department of Social Services (CDSS) staff conducted a Civil Rights Compliance Review of Riverside County Department of Public Social Services (RCDPSS) April 18 – 21, 2011. CDSS found that RCDPSS was in basic compliance with the CDSS Manual of Policies and Procedures (MPP) Division 21 regulations, as well as other applicable State and Federal civil rights laws.

However, CDSS noted three primary areas of concern case documentation, staff development, and vendor contract administration. Ongoing issues that have been identified as problematic in previous compliance reviews include case documentation and inconsistency in casework practices related to civil rights issues.

This Corrective Action Plan (CAP) will outline RCDPSS' plan for addressing the issues identified during the 2011 compliance review. Included in our plan are the steps we will take to correct the deficiencies and the estimated time lines for completion (or date of implementation for on-going efforts such as staff development).

II. 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/limited English speakers, as well as those with impaired hearing or vision or other disabling conditions.

Findings and Corrective Actions:

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
Children's Services usage of the Pub 13 pamphlet was inconsistent; it appeared that the pamphlet is only being used in ER and not FR/FM.	Broaden the use of the Publication 13 (Your Rights Under California Welfare Programs) in Children's Services.	1. Include information about Pub 13 usage in the 4-1-1 Children's Services newsletter, which is disseminated to all Children's Services Division staff.	05/31/12

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
		2. Review Pub 13 regulation/use with Children's Services supervisors/managers via telephone, follow up e-mail, and/or face-to-face contact.	05/31/12
The welfare fraud investigation sign is only posted in English in the La Sierra lobby.	Post a Spanish version of the welfare fraud investigation sign at La Sierra.	1. Submit work order requesting posting of the signage.	11/15/11
		2. Post Spanish version of the sign.	02/15/12

III. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. 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 (i.e., without much difficulty or expense).

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

CDSS staff evaluated the following Riverside County DPSS facilities during the course of their review:

- Jurupa Self-Sufficiency and Adult Services (CalWORKs, CalFresh, IHSS)
5961 Mission Boulevard, Riverside
- Jurupa Children's Services (ER, FM/FR)
5961 Mission Boulevard, Riverside (separate suite from Self-Sufficiency)
- La Sierra Self-Sufficiency (CalWORKs, CalFresh, GAIN)
11060 Magnolia Avenue, Riverside
- La Sierra Children's Services (ER, FM/FR)
11070 Magnolia Avenue, Riverside
- Corona Adult Services (IHSS)
505 S. Buena Vista Avenue, Corona

Findings and Corrective Actions

Facility Location # 1: Jurupa Self Sufficiency and Adult Services, 5961 Mission Boulevard, Riverside

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
The signage designating accessible parking spaces was missing the sign regarding minimum fines.	Add an additional sign below the international symbol of accessibility that states, "Minimum Fine \$250.00".	1. Submit the work order requesting the signage.	11/15/11
		2. Install the signage.	03/15/12
The hand sanitizer was mounted too high on the wall in the lobby/reception area for wheelchair customers (mounted at 48" from the floor).	Reposition the operable parts of the hand sanitizer dispenser no higher than 40" from the floor.	1. Submit the work order requesting removal of the hand sanitizer dispenser.	11/15/11
		2. Remove the dispenser.	02/15/12
The red lobby/reception phones provided for customers to call their workers were located out of reach for wheelchair	Reposition the red phones provided for customers to call their worker no higher than 34" from the floor and toward the front side of the	1. Submit the work order requesting repositioning of the customer telephones in the lobby.	11/15/11

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
customers. The phones were on counters 42" from the floor and placed at the back side of the counter.	counter.	2. Reposition the telephones toward the front side of the counter at a height that is between 28" – 34" from the floor.	03/15/12
The pressure required to open the restroom doors was too high (men's was 17 pounds and the women's was 14 pounds).	Adjust the pressure required to open the restroom doors to no more than 5 pounds.	1. Submit the work order requesting adjustment of the restroom door pressures.	11/15/11
		2. Adjust the restroom door pressures to no more than 5 pounds.	12/01/11
		3. Recheck/adjust the door pressures at quarterly intervals.	Initiate 01/03/12
The toilet seat protectors were placed on the wall too high and <i>behind</i> the toilet.	Reposition toilet seat protectors to the side of the toilet so that an individual can reach the product without twisting, such that the point where the protector dispenses from the holder is no more than 40" from the floor.	1. Submit the work order requesting repositioning of the toilet seat protectors.	11/15/11
		2. Reposition the toilet seat protectors to the side of the toilet, such that the point where the protector dispenses from the holder is no more than 40" from the floor.	03/15/12

Facility Location # 2: Jurupa Children's Services, 5961 Mission Boulevard, Riverside

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
The signage designating accessible parking spaces was missing the sign regarding minimum fines.	Add an additional sign below the international symbol of accessibility that states, "Minimum Fine \$250.00".	1. Submit the work order requesting the signage.	11/15/11
		2. Install the signage.	03/15/12
The hand sanitizer was mounted too high on the wall in the lobby/reception area for wheelchair customers (mounted at 48" from the floor).	Reposition operable parts of the hand sanitizer dispenser no higher than 40" from the floor.	1. Submit the work order requesting the removal of the hand sanitizer dispenser.	11/15/11
		2. Remove the dispenser.	02/15/12
The pressure required to open the restroom doors was too high (approximately 18 pounds).	Adjust pressure required to open the restroom doors to no more than 5 pounds.	1. Submit the work order requesting adjustment of the restroom door pressures.	11/15/11

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
		2. Adjust the restroom door pressures to no more than 5 pounds.	12/01/11
		3. Recheck/adjust the door pressures at quarterly intervals.	Initiate 01/03/12
The signage designating accessible restroom facilities was missing (i.e., there was no ISA or wall signage).	Add signage for gender identification on the wall adjacent to the latch outside of the door (space permitting), or on the nearest adjacent wall, to the right if possible.	1. Submit the work order requesting the signage.	11/15/11
		2. Install the signage outside of the door adjacent to the latch, space permitting. Otherwise the sign will be posted on the nearest adjacent wall.	03/15/12
The toilet seat protectors were placed on the wall too high (52") and <i>behind</i> the toilet.	Reposition the toilet seat protectors to the side of the toilet so that an individual can reach the product without twisting, such that the point where the protectors dispense from the holder is no more than 40" from the floor.	1. Submit the work order requesting repositioning of the toilet seat protectors.	11/15/11
		2. Reposition the toilet seat protectors to the side of the toilet, such that the point where the protector dispenses from the holder is no more than 40" from the floor.	03/15/12

Facility Location # 3 & 4: La Sierra District, 11060 & 11070 Magnolia Ave., Riverside

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
The signage designating accessible parking spaces was missing the sign alerting drivers to penalties for unauthorized parking in accessible spaces regarding minimum fines.	Add signs at the entrances to off-street parking that says in part: "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."	1. Submit the work order requesting the signage.	11/15/11
		2. Install the signage.	03/15/12
The signage designating accessible parking spaces was missing the sign regarding minimum fines.	Add an additional sign below the international symbol of accessibility that states, "Minimum Fine \$250.00".	1. Submit the work order requesting the signage.	11/15/11
		2. Install the signage.	03/15/12
The red lobby/reception phones provided for customers to call their workers were located out of reach for wheelchair customers. The phones were on counters 42" from the floor and placed at the back side of the counter. (Self-Sufficiency only)	Reposition the red phones provided for customers to call their worker no higher than 34" from the floor and toward the front side of the counter.	1. Submit the work order requesting repositioning of the customer telephones in the lobby.	11/15/11
		2. Reposition the telephones toward the front side of the counter and at a height that is between 28" – 34" from the floor.	03/15/12

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
The drop box for customer use in dropping off verifications was mounted too high (58" from the floor). (Self-Sufficiency only)	Reposition the verifications drop box so that the opening/slot is no higher than 40" from the floor.	1. Submit the work order requesting repositioning of the customer drop box.	11/15/11
		2. Reposition the verifications drop box such that the opening/slot is no higher than 40" from the floor.	03/15/12
The signage designating accessible restroom facilities was missing (i.e., there was no ISA or wall signage).	Add signage for gender identification on the wall adjacent to the latch outside of the door (space permitting), or on the nearest adjacent wall, to the right if possible.	1. Submit the work order requesting the signage.	11/15/11
		2. Install the signage outside of the door adjacent to the latch, space permitting. Otherwise the sign will be posted on the nearest adjacent wall.	03/15/12
The soap dispensers were mounted too high (45") in both the men's and women's accessible restrooms.	Reposition the soap dispensers such that at least one fixture in each accessible restroom will be mounted with all operable parts no higher than 40".	1. Submit the work order requesting repositioning of the soap dispensers.	11/15/11
		2. Reposition the soap dispensers such that the operable parts are no higher than 40" from the floor.	03/15/12

Facility Location # 5: Corona IHSS Office, 505 S. Buena Vista Avenue, Corona

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
The turn space in the restroom is not sufficient to allow a wheelchair to make a turn, the fixtures are mounted too high and the size of the stall does not meet ADA requirements.	Modify the existing restroom so that it is accessible, or provide an alternative accessible restroom.*	1. Submit a work order requesting signage directing customers to an accessible restroom.	11/15/11
	*The building is owned by the State of California; DPSS has no authority to request/make modifications to the building.	2. Coordinate with the State of California to install the directional signage.	03/15/12

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

CDSS MMP Division 21 requires counties 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 delay. Counties must make written materials available in individuals' primary languages when the forms and materials are provided by CDSS, and information inserted in notices of action must also be in the individuals' primary language. Additionally, counties must provide effective communication and services for persons with hearing, speech, vision, or manual skill disabilities.

Findings and Corrective Actions

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
<p>There is inconsistency in the offering of written material in a client's primary language. Some employees utilize prior versions of the form 3167 (intended to document use of communication preferences). The older form does not include the section where translated written forms are offered. *</p> <p><u>RCDPSS Note:</u> Form 3167 documents communication preferences; form 1764 documents the tools used to provide effective communication with our customers. An old version of form 3167 was inadvertently made</p>	<p>Oversight and training of staff is necessary to ensure that the current updated version of the form 3167 is utilized by the workers.</p>	1. Remove the outdated version of form 3167 from the RCDPSS Forms Control page located on the Department's Intranet.	Completed 03/28/11
		2. Provide mandatory on-line refresher training to case-carrying staff about Division 21 mandates regarding language identification and proper documentation of the use of communication tools.	05/31/12

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
available for staff use. RCDPSS agrees that case-carrying employees are not consistent in documenting language preferences and the use of communication tools.			
Staff advised the auditor that they often use customer-provider interpreters for languages other than Spanish with some citing difficulty securing the County-contracted language service provider.	No specific corrective action was requested	1. Identify and use an alternate vendor when the County's contracted provider is unable to provide an interpreter as requested.	01/19/12
		2. Educate staff via a new Department Memorandum regarding requesting and using interpreters for non-English speaking/proficient customers.	12/15/11
		3. Disseminate information to all staff via e-blasts regarding requesting and using interpreters for non-English speaking/proficient customers.	04/15/12

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 having a disability, and an applicant/recipient's request for auxiliary aids and services.

Findings and Corrective Actions

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
Staff members do not consistently document that bilingual services were provided.	Staff must document the method used to provide bilingual services, (e.g., the assigned worker is bilingual, another bilingual employee acted as the interpreter, a volunteer interpreter was used, or the client provided their own interpreter).	1. Provide mandatory on-line refresher training to case-carrying staff on Division 21 mandates regarding documenting the provision of bilingual services on form 1764.	05/31/12
Staff members do not consistently document the offer of translated written materials/forms.	RCDPSS needs to provide additional instruction to staff in correctly documenting the offer and use of translated written materials/forms.	1. Provide mandatory on-line refresher training to case-carrying staff regarding Division 21 mandates for documenting the offer and use of translated written materials/forms on form 1764.	05/31/12

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 in the continuing training programs.

Findings and Corrective Actions

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
There is no regular ongoing Civil Rights training program in place. Employees receive Civil Rights training as new hires, but are not required to attend subsequent refresher training.	Each public contact employee shall receive training in the requirements of Division 21 during orientation and in continuing training programs.	1. Provide on-site training to supervisor/managers regarding Division 21 provisions.	Initiate 10/05/11
		2. Provide mandatory on-line training to case-carrying staff regarding topics noted in the compliance audit findings.	05/31/12
		3. Implement on-going e-blasts for all RCDPSS staff that will initially cover topics pertinent to the compliance audit findings.	Initiate 04/05/12
		4. Incorporate Division 21-related topics on a periodic basis into various newsletters (e.g., Children's Services 4-1-1 and the DPSS newsletter).	01/31/12

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.

Findings and Corrective Actions

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
<p>Staff members do not consistently identify the difference between a program, discrimination, or personnel complaint; do not know the name of the Civil Rights Coordinator, or the location of the civil rights poster.</p> <p><u>RCDPSS Note:</u> In an e-mail dated 02/05/09, CRB granted permission to RCDPSS to remove the name of the Civil Rights Coordinator's name from the Pub 86 poster in an effort to reduce confusion that had previously resulted from frequent coordinator name changes. In lieu of the coordinator's name, RCDPSS has listed the office where the coordinator is located (i.e., RCDPSS Human</p>	<p>On-going Civil Rights/Division 21 training should include discussion of the differences in types of client complaints and the processes to resolve those complaints.</p>	<p>1. Provide mandatory on-line refresher training to all staff regarding complaint procedures, which will include information about the content and location of informing posters (i.e., Pub 86 at all offices and AD 475B for offices that provide CalFresh benefits).</p>	<p>05/31/12</p>

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
Resources/ Administrative Compliance Services, the office location, and the telephone number, which are all constants.			

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

Provision was made in Section 1 of the approved 2011-2012 Civil Rights Plan for the Assurance of Compliance Statement to be obtained from each contractor providing additional services to RCDPSS customers.

During the review of a sample of active contracts, it was found that the Assurance of Compliance Statement was not included as called for in the plan. A general statement regarding adherence to Federal and State discrimination policies was inserted in the text of the contracts in lieu of the signed Assurance of Compliance Statement.

Findings and Corrective Actions

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
The Assurance of Compliance Statement was not included as called for in the Plan. A general statement regarding adherence to Federal and State discrimination policy was inserted in the text of the contracts	RCDPSS must provide necessary oversight of its Civil Rights Plan to ensure that policies set forth are complied with.	1. Re-review assurance of compliance requirements with RCDPSS Contracts Administration.	11/30/11

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
reviewed in lieu of the signed Assurance of Compliance Statement.		2. Work with RCDPSS Contracts Administration and the CRB on issues RCDPSS Contracts Administration encountered with vendors regarding the assurance statement format.	02/01/12