



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

May 4, 2012

Mr. Joseph Chelli, Director
San Joaquin County Human Services Agency
102 San Joaquin Street
P. O. Box 201056
Stockton, CA 95201-3006

Dear Mr. Chelli:

This letter is to advise you that the Corrective Action Plan you submitted on April 17, 2012, in response to the results of our 2011 Civil Rights Compliance Review is approved.

We will be monitoring the implementation of your corrective action items through your Civil Rights Coordinator. Please have your Civil Rights Coordinator provide our office with an update on the corrective actions by July 1, 2012.

If you have any questions, please contact Daniel Cervantes at (916) 654-2107. You may also contact the analyst by e-mail at Daniel.Cervantes@dss.ca.gov.

Sincerely,

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

c: Melissa Sangalang, Civil Rights Coordinator

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

Mike Papin, Chief
CalFresh Policy Bureau M.S. 8-9-32

Marlene Fleming, Chief
Field Operations Bureau M.S. 8-9-32

Brian Tam, Chief
CalFresh Management Operations Section M.S. 8-9-32

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

Thuan Nguyen
Refugee Programs Bureau, M.S. 8-8-46

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

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

Hope Rios,
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
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Jodie Berger, Regional Counsel
Legal Services of Northern California



SAN JOAQUIN COUNTY

JOSEPH E. CHELLI
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APR 19 2012

CalWORKs
Head Start
First 5 San Joaquin
Children's Services
Aging and Community Services
Mary Graham Children's Shelter

April 17, 2012

Mr. Jim Tashima, Chief
Civil Rights Bureau
Human Rights and Community Services Division
Department of Social Services
744 P Street
Sacramento, CA 95814

Dear Mr. Tashima:

Attached you will find the Corrective Action Plan addressing the compliance issues as identified in the Civil Rights Compliance Review of April 11-14, 2011.

While many of the issues have already been corrected, we believe the remaining issues identified can be corrected through additional training and communication with staff.

If you have questions about the Corrective Action Plan please contact our Civil Rights Coordinator, Melissa Sangalang at 209-468-2027.

Sincerely,

Joseph E. Chelli, Director

Enclosure

c: Melissa Sangalang, Civil Rights Coordinator



CIVIL RIGHTS COMPLIANCE REVIEW

April 2011



CORRECTIVE ACTION PLAN

April 2012

Upon reviewing the cited deficiencies and the items requiring corrective action, we have determined that a significant number are fully covered by HSA handbooks and/or other guidance. This has led to the conclusion that refresher training, covering some of the fundamentals of the Civil Rights requirements, is needed.

Listed below are the items identified in the Civil Rights Compliance Review Report as requiring corrective action.

III. DISSEMINATION OF INFORMATION

Translated Pub 13: San Joaquin HSA 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 client in their primary language.

Auxiliary Aids: The required auxiliary aids must be made readily available to the public and the reception staff must be aware of their existence and location. SJCHSA shall ensure the availability of large print, Braille and auditory aids for participants in all of the programs for which CDSS has oversight responsibility.

Posters: San Joaquin HSA shall ensure that the most recent version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms.

Corrective Action: Pub 13 has been provided in alternate formats to the Reception area for use by clients as necessary. Large print Pub 13's are available to all employees through the internet and printed copies have specifically been provided to Adult Services Workers. The HSA Civil Rights Coordinator maintains Braille copies of Pub 13, as well as an audio cassette version (English and Spanish). Workers can contact the Coordinator when these are needed. Copies of Braille, and an English/Spanish CD have been requested and will be provided to staff at all locations upon receipt.

All HSA workers have access to the internet and, hence to large print or otherwise modified material available through CDSS. The alternate format publications are also available in Personnel.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

**Location: 900 East Oak Street, 2nd Floor, Stockton, CA
CalWORKs Employment Services Center**

Outside signage: No accessible signage at building's main entrance.

Restrooms-2nd Floor: The paper towel dispenser in the *Men's* restroom is too high at 52 inches. In the *Women's* restroom, the toilet protector dispenser is too high at 46 inches. The toilet tissue dispenser is too far from the front edge of the toilet at 39 inches.

Restrooms-3rd Floor: The toilet protector dispenser in the *Men's* restroom is too high at 39 inches. The toilet tissue dispenser is too far from the front edge of the toilet at 39 inches.

Corrective Action: The facilities management company responsible for building maintenance, Cort, has been contacted to make these corrections. Expected date of completion: June 30, 2012

**Human Services Agency
Location: 102 S. San Joaquin St. Stockton, CA**

Parking: Only 3 of the 6 handicap stalls had proper "minimum fine \$250.00" signage.

Corrective Action: HSA staff is working with the City of Stockton to ensure that the handicap stalls in the city-owned lot are brought into compliance. Expected date of completion: April 20, 2012.

Restrooms (Men & Women's): Door pressure excessive at 8 lbs.

Corrective Action: HSA is currently in the process of renovating our client restrooms. The door pressure will be adjusted to 5 lbs once the work is completed. Expected date of completion: May 31, 2012.

Written Materials: San Joaquin HSA must use and provide translated forms, to include translated notice of action forms, in the clients' primary languages when translated by CDSS.

Corrective Action: HSA will continue to provide ongoing education and training to workers. For a primary language form, HSA has developed and utilizes form SJ 100, Documentation of Language Preference for Written Communications and Offer of Interpreter.

Woodbridge Medical Group
Location: 2401 Turner Rd. Woodbridge, CA

Parking: No van accessible parking. No signage, either freestanding or on the wall designating accessible parking stall. Available handicap stall only 15 feet long. Handicap parking stall is not located as close as possible to building's main entrance.

Corrective Action: The landlord at this non-County owned facility has been contacted regarding the corrections. Expected date of completion is unknown at this time.

Restroom (Unisex): Soap dispenser too high at 53 inches. Toilet protector too high at 48 inches. Mirror base too high at 48 inches. Paper towel dispenser too high at 41 inches.

Corrective Action: The landlord at this non-County owned facility has been contacted regarding the corrections. Expected date of completion is unknown at this time.

Channel Medical Center
Location: 701 E. Channel St. Stockton, CA

Exterior Entrance: No accessible signage at building's main entrance.

Corrective Action: Outside signage has been installed.

Women's Restroom: Paper towel dispenser too high at 50 inches.

Corrective Action: Paper towel dispenser will be lowered to 40 inches. Expected date of completion: June 30, 2012

San Joaquin General Hospital
Location: 500 W. Hospital Rd. French Camp, CA

Men's and Women's Restrooms: Sign on restroom door(s) not ADA compliant.

Corrective Action: San Joaquin General Hospital Facilities staff will add appropriate signage as indicated by reviewer. Expected date of completion: May 31, 2012.

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

Use of CDSS-translated forms in the clients' primary language: San Joaquin County Human Services Agency must use and provide translated forms, in the clients' primary languages when translated by CDSS.

Corrective Action: Provide ongoing education and training to workers. For a primary language form, HSA has developed and has been utilizing form SJ 100.

VI. DOCUMENTATION OF APPLICAN/RECIPIENT CASE RECORDS

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 applicant/recipient was so informed.

Corrective Action: Staff is trained upon hire and annually thereafter how to correctly document any occasion where applicants/recipients provide their own interpreter. Ongoing education and training continues to be provided for workers. The recent inclusion of a Universal Template in C-IV allows workers to document in the case record that the client has provided their own interpreter, and that they have been informed that their choice could lead to ineffective communication. Staff has been instructed to use the Universal Template when entering comments on case actions.

Documentation of interpreter signed confidentiality statement: Consent for the release of information shall be obtained from applicants/recipients when individuals other than the CWD employees are used as interpreters and the case record shall be so documented.

Corrective Action: Staff is reminded to have the interpreter and the client sign the HSA 31 which is the certification of confidentiality and the consent for release of information form for our agency.

Documentation of Primary Language: Each agency shall ensure that the case record identification shows the applicants/recipients ethnic origin and primary language.

Corrective Action: Documentation of primary language and ethnic origin is captured on the C-IV Individual Demographics Detail page. Both fields are mandatory. Each case also contains an SJ 100, Documentation of Language Preference/Offer of Interpreter; even if the client's primary language is English. The SJ 100 is included in all applications; add programs, and renewal/recertification packets.

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.

Corrective Action: To the extent possible, non-English speaking clients are assigned to a worker who speaks the same language. Employees are required to document in journal notes each time an interpreter is used.

General: San Joaquin HSA must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance.

Corrective Action: Ongoing education and training continues to be provided for workers.

VII. STAFF DEVELOPMENT AND TRAINING

Division 21, Civil Rights Training: The County shall ensure that employees received Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure the public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1

Corrective Action: HSA's Staff Development Division provides Civil Rights Training to public contact personnel. New eligibility workers receive the training during a required, 16 week induction training session. Other classes are held for new workers from other functions and for refresher training for experienced workers. Refresher training is required every four years. This is being monitored by Staff Development Division. HSA implemented mandatory online training in January 2012. All staff were required to complete the online course.

Cultural Awareness Training: The County shall ensure that all public contact employees receive cultural awareness training to ensure that public contact staff has an understanding of and sensitivity to the various cultural groups in the county's population. Div. 21-117.2

Corrective Action: As of January 2003, all San Joaquin County employees were required to attend mandatory Diversity Training. Additionally, they must attend a refresher course every two years. We will continue to monitor employee attendance and schedule as needed.