

**California Department of Social Services  
Human Rights & Community Services Division  
Civil Rights Bureau**

# **CIVIL RIGHTS COMPLIANCE PLAN GUIDELINES**

**December 2009**

## TABLE OF CONTENTS

- Section I. Assurance of Compliance Statement
- Section II. Assignment of Resources
- Section III. Community Profile
- Section IV. Dissemination of Information
- Section V. Services to Non-English-Speaking, Limited-English-Proficient Applicants/Recipients and Applicants/Recipients with Disabilities
- Section VI. Documentation of Applicants'/Recipients' Case Records
- Section VII. County Services Provided by Contractors, Subcontractors, Vendors
- Section VIII. Primary Language Data Statistics, Staffing and Hiring Goals
- Section IX. Significant or Proposed Program and Facility Changes
- Section X. Accessibility of Offices
- Section XI. Staff Development and Training
- Section XII. Discrimination Complaint Procedure
- Section XIII. Discrimination Complaint Log
- Section XIV. Self Monitoring
- Section XV. Non-Mandated Civil Rights Programs and Activities
- Section XVI. Technical Assistance

## **CIVIL RIGHTS COMPLIANCE PLAN GUIDELINES**

In accordance with the California Department of Social Services' (CDSS) Manual of Policies and Procedures (MPP), Division 21, Section 21-201.22, each County Welfare Department is required to submit a Civil Rights Compliance Plan update to the CDSS Civil Rights Bureau (CRB). The Compliance Plan update is to provide current civil rights information regarding counties' enforcement of Title VI of the Civil Rights Act of 1964 as amended; Section 504 of the Rehabilitation Act of 1973, as amended; the Age Discrimination Act of 1975, as amended; the Food Stamp Act of 1977, as amended, and in particular Section 272.6; Title II of the Americans with Disabilities Act of 1990; California Civil Code, Section 51 et seq., as amended; California Government Code Section 11135-11139.5, as amended; California Government Code Section 12940 (c), (h) (1), (i), and (j); California Government Code, Section 4450; Title 22, California Code of Regulations Section 98000–98413; the Dymally-Alatorre Bilingual Services Act; Section 1808 Removal of Barriers to Inter Ethnic Adoption Act of 1996 and other applicable federal and state laws, as well as their implementing regulations.

The document submitted in response to these guidelines must cover the following:

1. The county's plan to maintain compliance with MPP Division 21 in county programs, including CalWORKs, Overpayment and Tax Intercepts or Collections, Children's Services, Foster Care and Adoptions Placement, Adult Programs, Fraud Investigations, Food Stamps, Non-Assistance Food Stamps, Cash Assistance Program for Immigrants, and all other social service programs administered by the county and funded through CDSS;
2. Identification of the portions that have remained the same;
3. Identification of changes necessary for continued compliance in the coming year.

The following guidelines and formats are to be followed in the preparation and submission of the information submitted in your Compliance Plan update. Changes from the previous Plan should be indicated and described in detail. Portions that have not been changed can be repeated from the previous Plan. Counties may submit the plan in a different format, such as including many attachments that cover requests for narrative information, as long as the plan contains all the elements requested herein. Any examples used in the guidelines are only illustrations and do not necessarily encompass all information required to be submitted. Attach any written policies or memoranda that are cross-referenced to the Compliance Plan section number.

### **Section I. Assurance of Compliance Statement**

- A. Federal and state regulations (Section 21-103) require each county to submit a written Assurance of Compliance Agreement. This written assurance is to be incorporated into the county's Compliance Plan update as part of the State/county agreement to maintain compliance with all civil rights laws, rules and regulations. Use the attached copy of the Assurance of Compliance Agreement, which contains current revisions. The Agreement is a legal document; therefore, it must have the Director's original signature.
- B. If services to applicants/recipients are provided by county contractors or subcontractors, such providers of service must also certify compliance with all civil rights laws, rules and regulations using an Assurance of Compliance Agreement from each such provider of service with the contractor's administrator's original signature. Such agreements shall be made available to CDSS for review upon request.

**Section II. Assignment of Resources**

Section 21-201.1 requires the county to designate an employee as the Civil Rights Coordinator (CRC) and to provide adequate personnel and resources to ensure nondiscrimination in the delivery of services.

- A. Provide the name, address, phone, e-mail and fax numbers of the CRC and the number of personnel allocated to the implementation of the Civil Rights Program.

Example

Position	Name and identification
Civil Rights Coordinator	Jane Smith, CRC 111 Main Street Canton, CA 33333 222-222-2222 <a href="mailto:jsmith@xxxxxxx.co">jsmith@xxxxxxx.co</a> 222-333-3333
Complaint Investigator	John Smith 111 Main Street Canton, CA 33333 222-222-2223 <a href="mailto:josmith@xxxxxxx.co">josmith@xxxxxxx.co</a> 222-333-3334

State whether the number of allocated personnel has increased, decreased, or remains at the same level as in the previous year.

- B. If personnel allocated to the Civil Rights Program have responsibilities in areas other than civil rights, please list those responsibilities and provide the percentage of time allocated to civil rights by each individual.

Example

Position	Percent of time to Civil Rights	Other Responsibility
Civil Rights Coordinator	50	Staff Development
Civil Rights Investigator	20	Social Worker Supervisor

- C. Pursuant to Section 21-203.3, state whether any of their other responsibilities represent a conflict of interest with the Civil Rights Program, and if so, how such conflicts are addressed and resolved.
- D. Submit a departmental organizational chart, identifying the reporting level of the Civil Rights Unit.
- E. Provide conflict of interest policy regarding employees conducting investigations as specified in Section 21-203.3.

### **Section III. Community Profile**

Provide information on community characteristics that may affect the delivery of services. Please include the source of any countywide statistical information provided in this section.

- A. Provide a brief narrative describing the county, such as size, geographic location, major ethnic groups, major non-English-language groups, employment levels, average incomes, etc.
- B. Provide client information describing the caseload population by ethnic origin and race as shown in the example:

Example

Race of Welfare Population by Program Countywide						
Race	CalWORKS		N.A. Food Stamps		Children's	
	Number	Percent	Number	Percent	Number	Percent
White	10	16	20	26	10	23
Black/African Amer.	10	16	13	17	8	19
Amer. Indian	2	3	0	0	2	5
Chinese	2	3	10	13	6	14
Cambodian	5	8	8	11	4	9
Vietnamese	4	6	7	9	4	9
Laotian	2	3	0	0	2	5
Japanese	0	0	2	3	0	0
Korean	2	3	2	3	2	5
Other Asian	0	0	4	5	1	2
Samoan	0	0	2	3	0	0
Asian Indian	0	0	2	3	0	0
Hawaiian	5	8	0	0	2	5
Guamanian	0	0	2	3	0	0
Filipino	0	0	0	0	0	0
Other Pacific Island	20	32	4	5	2	5
Alaska Native	0	0	0	0	0	0
TOTAL	62	100	95	100	83	100

Example

Ethnicity of Welfare Population by Program Countywide						
Ethnicity	CalWORKs		N.A. Food Stamps		Children's	
	Number	Percent	Number	Percent	Number	Percent
Hispanic or Latino	10	25	13	52	15	43
Not Hispanic or Latino	30	75	12	48	20	57

Provide a brief narrative describing any unusual or significant county or community circumstances that adversely affect, or may affect, the effective delivery of services, and policies and procedures to remedy this. Such circumstances might include recent or projected low-income population shifts to areas further removed from county facilities; significant increases in low-income or ethnic population; seasonal influx for agricultural or other employment purposes; discontinuance, reduction, or lack of public transportation making it difficult for applicants/recipients to travel to a county facility; climate conditions that make travel difficult.

## **Section IV. Dissemination of Information**

Section 21-107 requires the county to do the following:

- A. Provide Civil Rights Program information to all applicants and recipients, including non-English-speaking and limited-English-proficient applicants/recipients, disabled applicants/recipients, community organizations and other interested persons. Some examples include information about prohibited acts of discrimination (such as denial, delay or different treatment) and the county's policy of nondiscrimination; procedures for filing discrimination complaints; rights and responsibilities of applicants/recipients.
- B. Through outreach provide program information to potential and actual applicants and recipients of services. Some examples of outreach information to be disseminated are programs provided, program changes, office locations and hours; services accessible to individuals with limited-English proficiency, non-English-speaking individuals and to individuals with disabilities; basic eligibility requirements for public assistance.

Include information in response to the following:

1. Describe how applicants and recipients are informed of their right to aid or services in their primary language and the availability of auxiliary aids for applicants and recipients who are hearing or visually impaired and at what points in the service delivery this is done. This may include the use of "I speak" cards, posters, videos, etc. (Refer to Paragraph IV.A. above and Section 21-107 for additional guidance.)
2. Describe how, when, and in what languages the CDSS pamphlet, "Your Rights under California Welfare Programs" (Pub 13) is distributed and explained to applicants/recipients. (Section 21-107.22)
3. Describe how this outreach information is disseminated, e.g., bilingual posters and pamphlets, newspaper articles, public service radio and television announcements. Describe how this information is made available to all county residents, including individuals who are located in remote areas or who cannot access information during regular business hours, e.g., expanded office hours, mobile offices, etc. Provide dates, location, methods and languages in which outreach has been provided. (Refer to paragraph IV.B. above and Section 21-107.24 for additional guidance.)

## **Section V. Services to Non-English-Speaking, Limited-English-Proficient Applicants/Recipients and Applicants/Recipients with Disabilities**

Section 21-115 requires that counties ensure that effective bilingual/interpreter services are provided to non-English-speaking and limited-English-proficient applicants/recipients and individuals with disabilities. Section 21-109 provides that county welfare departments may not, on the basis of race, color, national origin, religion, political affiliation, marital status, sex, age or disability, directly or through other arrangements (including by use of contractors), provide aid, benefits, or services to an individual or group different from that provided to others unless those benefits and assistance provided are as effective as those provided to others.

- A. Summarize your procedures to provide services to non-English-speaking, limited-English-proficient and disabled applicants/recipients, taking into consideration such components as methods of providing notices, use of translated forms and materials, and identification of primary language. Summarize the following:
  1. Procedures to allow an applicant/recipient to self-identify primary language, e.g., providing a list of languages to choose from, using an "I speak" card, posting an easily visible sign at the reception window listing several languages, etc.

2. Procedures for offering language identification form to a client and timing of the offering of such a form. Provide a copy of the form.
3. When an applicant/recipient fails to self-identify primary language, procedures for actions to be taken by a worker and procedures for disclosing such action to the applicant/recipient.
4. Procedures to identify an applicant's/recipient's disability (physical or mental impairment, which could limit access or participation).
5. Procedures for offering free interpreter services and auxiliary aids, addressing all languages spoken by applicants/recipients, including American Sign Language.
6. Procedures to identify an applicant's/recipient's need for services due to his or her disability, limited-English proficiency or inability to read or write and provide the opportunity for him or her to request auxiliary aids, services, translated forms, or assignment to a bilingual worker or other interpreters. Describe services and accommodations provided, e.g., interpretation by paid interpreters or other county employees, Braille materials, etc.
7. Procedures to ensure that services or benefits are not unduly delayed due to an applicant's disability, limited English proficiency, or inability to read or write.
8. Procedures to certify staff as qualified bilingual, including American Sign Language bilingual staff.
9. Procedures to ensure that interpreters are able to interpret effectively, accurately and impartially, both receptively and expressively, using any necessary specialized vocabulary.
10. Procedures to track the use of interpreters (not including the assigned caseworker), such as the use of a log or other methods.
11. Policies and procedures regarding when it is inappropriate to allow clients to use their own interpreters, as well as the policies and procedures for when clients may be allowed to use their own interpreters, including the limited circumstances under which a client is allowed to exclusively use his or her own interpreter, when the county provides its own interpreter in addition to the client's interpreter, under what extenuating conditions clients would be allowed to temporarily use minors as interpreters, how interpreter competency is verified, and how confidentiality of the interpreter is ensured.
12. Procedures for assigning non-English-speaking and limited-English-speaking clients to bilingual staff and documenting such assignments.
13. Procedures for ensuring that non-English-speaking and limited-English-speaking clients are served when their bilingual workers are not available.
14. Procedures to ensure that case files identify non-English-speaking and limited-English-speaking or disabled applicants/recipients so that when transferred from one case worker to another within the program or one program to another program, services can be provided appropriately.
15. Procedures for ensuring that when cases are transferred from one worker to another or one program to another that the transfer occurs without undue delay.
16. Procedures to provide for translation services if qualified interpreters are not available in the office, ensuring that services are provided without undue delay.
17. Procedures, if any, for capturing and reporting statistics regarding the number of cases, by program, of individuals who are identified (self-identified or otherwise identified) as having a disability.

B. Describe or provide the following:

1. Availability and use of translated forms and materials in the dissemination of information;
2. How translated paragraph insertions are included in Notices of Action and other forms;

3. How information is provided to applicants/recipients when forms and materials in their primary languages are not available;
  4. How frequently and in what way staff are informed about available translated forms and materials;
  5. Any forms and materials translated by your county (list forms) and the languages into which they are translated;
  6. The name, e-mail address and phone number of your Forms Coordinator.
- C. Provide information on services and auxiliary aids available, e.g., TDDs, California telephone relay services, Braille material, taped text, large print materials, and/or other accommodations that are available to individuals with disabilities.
- D. Provide a list of community organizations, such as civil rights groups, legal aid societies or other community organizations, available to provide services to applicants/recipients, types of services provided, and relationship with the county (contractual, mutual agreement, memorandum of understanding).
- E. Describe procedures used to ensure meaningful and effective access to services by informing non-English-speaking and limited-English-proficient and disabled applicants/recipients of services and aids available at each stage of their receipt of services, e.g., from intake through assessment to employment services or from emergency response through placement to family reunification.

#### **Section VI. Documentation of Applicants'/Recipients' Case Records**

Section 21-116 requires the county to document in applicants'/recipients' case files certain information or actions taken. Provide a brief narrative of your policy/procedure about documenting this information in case files, highlighting any distinctions made between paper and electronic case records. Include at a minimum how you document:

1. Applicants'/recipients' ethnic origin, race and primary language;
2. Information that identifies the applicant/recipient as disabled;
3. Applicants'/recipients' requests for auxiliary aids, services or interpreter services and how those services were provided;
4. Applicants/recipients providing their own interpreters, including temporary emergency use of minors to translate;
5. Extenuating circumstances requiring temporary use of minors as interpreters;
6. Competency of interpreters;
7. Client's consent for release of information to interpreters;
8. Evidence of intent to maintain confidentiality by interpreters;
9. Evidence of informing applicants/recipients of the potential problems for ineffective communication when providing their own interpreters;
10. Applicants'/recipients' requests for forms and materials in other than their documented primary languages;
11. That applicants/recipients were offered, accepted, or refused forms and materials in their documented primary languages.



## **Section VII. County Services Provided by Contractors, Subcontractors, Vendors**

Division 21 requires that private businesses that contract to administer welfare programs comply with nondiscrimination statutes because they act as agents of the county in carrying out the programs or activities. Counties are responsible for ensuring that their contractors (hereafter in this document used to mean contractors, subcontractors and vendors) administer their programs in a nondiscriminatory manner and in compliance with civil rights obligations to accommodate non-English-speaking or limited-English-proficient individuals and individuals with disabilities or impairments. Such contractors include, among others, employment assessment contractors; employment, vocational, and educational training contractors; family service contractors; and domestic violence assistance contractors. Include the following information in your plan:

1. A complete list of contractors who provide services to applicants/recipients, including address, program, and a brief description of the types of services provided;
2. A description of monitoring procedures used in the county to ensure nondiscrimination in services and accessibility of facilities used in providing these services, including language services. At a minimum, address the following issues:
  - a. Policies and procedures for addressing complaints filed with or against a contractor;
  - b. Policies and procedures for ensuring that contractors accommodate individuals with hearing impairments, visual impairments and other disabilities (see Section V.C.);
  - c. Policies and procedures for ensuring that contractors provide appropriate language services, including a breakdown of the number of bilingual staff or interpreters available to provide services and how written information is effectively communicated to non-English-speaking and limited-English-proficient individuals (see Section V.A., 1-16);
  - d. Policies and procedures for ensuring that contractor staff are adequately trained in the requirements of Division 21;
  - e. Procedures for informing participants of their civil rights.
3. Information on where contracts are located, e.g., administrative office, district office.
4. The results of your prior year's monitoring of contractors. At a minimum, address the following:
  - a. Civil rights complaints filed and how the complaints were addressed;
  - b. How participants are informed of their civil rights;
  - c. Any barriers to civil rights compliance that were encountered in the past year;
  - d. Any problems encountered in the last year with a description of how they were resolved;
  - e. Any policies and procedures that are going to be or have been implemented to ensure that problems do not recur; and
  - f. Any promising practices or special successes your county has experienced during the year related to civil rights compliance in the area of contracted services.

**Section VIII. Primary Language Data, Staffing and Hiring Goals**

Use this section to provide primary language data and statistics of public social service program caseloads, the number of bilingual staff serving applicants/recipients in applicants'/recipients' primary languages, and hiring goals if staffing is not sufficient, using the formats provided. Describe your efforts to meet these hiring goals. This information is required on a countywide basis, as well as for all offices and public social services programs within the county offering public social services programs and services. Identify each set of data as either countywide or by office name, program and location. Counties should specify the source of this data, e.g., a county database, and the period of time covered by the data.

- A. Provide primary language data statistics of welfare program caseloads following the example below (the examples do not include all languages to be reported):

Example\*

**PRIMARY LANGUAGE OF WELFARE CASELOAD BY PROGRAM COUNTYWIDE**

Language	CalWORKS		N.A. Food Stamps		IHSS	
	Number	Percent	Number	Percent	Number	Percent
English	583	61	239	59	132	60
Spanish	287	30	140	34	74	34
Vietnamese	79	8	27	7	14	6
TOTALS	949	100	406	100	220	100

Example\*

**PRIMARY LANGUAGE OF WELFARE CASELOAD BY EACH DISTRICT OFFICE**

4321 East Main Street

Language	CalWORKS		N.A. Food Stamps		IHSS	
	Number	Percent	Number	Percent	Number	Percent
English	235	47	39	59	27	61
Spanish	256	50	24	36	15	34
Cambodian	12	2	3	4	2	5
TOTALS	503	99	66	99	44	100

Languages (and codes relating to each language) used in reporting statistics on State form ABCD 350 are listed below. The languages in use in your county should be reflected in your statistics. For applicant/recipient groups whose primary language is not on the list, specify the language by name.

Languages

- |                                  |               |
|----------------------------------|---------------|
| 0 – American Sign Language (ASL) | 1 – Spanish   |
| 2 – Cantonese                    | 3 – Japanese  |
| 4 – Korean                       | 5 – Tagalog   |
| 6 – Other non-English            | 7 – English   |
| A – Other Sign Language          | B – Mandarin  |
| C – Other Chinese Languages      | D – Cambodian |

\* Repeat these statistics for each office where programs or services are provided as requested.

E – Armenian  
 G – Mien  
 I – Lao  
 K – Hebrew  
 M – Polish  
 O – Portuguese  
 Q – Arabic  
 S – Thai  
 U – Vietnamese

F – Ilocano  
 H – Hmong  
 J – Turkish  
 L – French  
 N – Russian  
 P – Italian  
 R – Samoan  
 T – Farsi

- B. Provide statistics on the number of public contact staff who are assigned to a non-English-speaking or limited-English-proficient caseload by program and office, using the format provided. Public contact staff is defined as any employee who comes in contact with the public. In programs and offices where a substantial number (as defined in Section 21-104.s) of cases are non-English-speaking and limited-English-proficient applicants/recipients, show the program by title, list the language and percentage, and the number of staff in each occupational category. Using the formula specified in Section 21-115.14, calculate the number of certified bilingual staff required. Enter the number of public contact staff who are assigned to a non-English-speaking or limited-English-speaking caseload and are certified as bilingual in this language and/or indicate a hiring goal.

Example \*

Children's Program: Main Office Social Workers Spanish Language	
20	Total number of social workers
9	Percent of cases
2 (rounded)	Number of required certified bilingual social workers

Example \*

CalWORKs Program: Main Office (address) Spanish-Speaking Clients: 9 percent				
	Total Staff	Certified Bilingual staff required	Number of certified bilingual staff	Hiring goal
Eligibility Supervisor	7	1	0	1
Eligibility Workers	28	3	0	3
Receptionists	2	1	1	0

For programs that do not serve a substantial number of non-English-speaking applicants/recipients, show programs by title and enter the number of bilingual staff in each occupational category or job classification. Provide a brief narrative describing your procedure for providing bilingual services to these persons.

Use the following format to report statistics on staffing requirements:

Example\*

\* See footnote on previous page.

CalWORKs Program: Main Office (address)			
	Total Staff	Number of certified bilingual staff	Hiring goal
Eligibility Supervisor	7	0	0
Eligibility Workers	47	2	4
Receptionists	2	1	1

C. A listing of languages spoken by certified bilingual public contact employees in each office, listing office, program, occupational group or job classification and number of employees must be maintained on a current basis in each office and attached to this Compliance Plan update. Report only staff who are actually available to provide interpreter or bilingual services (e.g., do not list staff whose job description, union contract, workload, etc., prevent them from interpreting).

Format for this listing:

Example\*

Main Office			
Language	Occupational Group or Service Classification	Number	Total
Tagalog	Social Worker	1	
	Clerk	2	3
German	Eligibility Worker	3	
	Assessment Worker	1	
French	Eligibility Worker	1	
	Clerk Receptionist	1	2

(List any other language skills not shown above for each office)

### **Section IX. Significant or Proposed Program and Facility Changes**

Summarize any significant program, policy and/or facility changes that your agency is planning to implement in the upcoming year or has implemented in the previous year that could or did have a major impact on the civil rights of clients to receive meaningful and effective access to programs and services and for which you will be or were required to perform an impact analysis as required by Division 21 in the Section entitled County Civil Rights Impact Studies. Include the following information about prior and proposed changes:

1. Name of program, activity, and/or location impacted.
2. Description of changes, addressing the major impacts of the changes in service delivery, such as office closures, office relocations, newly-leased offices, new automation systems, pilot programs, newly-constructed facilities.
3. Policy and procedures to identify major impacts of these changes and provide a plan of action to correct any identified consequences which would negatively or disproportionately affect clients in your delivery of services.
4. Copy of any consent decrees, complaint resolutions, or federal, state or county agreements that address actions to be taken by the county in response to a civil rights complaint. Any required reports submitted in the reporting year may be reviewed during a compliance review.

---

\* See footnote on page 10.

## **Section X. Accessibility of Offices**

Section 21-111 requires that individuals with disabilities may not be excluded from programs and activities because buildings in which the programs or services are provided to applicants/recipients are inaccessible. However, providers need not alter inaccessible buildings if they provide alternative methods that would be equally effective in making programs and activities accessible to individuals with disabilities, such as using other locations or home visits, with prior written approval from CDSS. This requirement includes accessibility to facilities or services operated and delivered by contractors.

However, counties must ensure that newly-constructed or newly-leased buildings and facilities used by applicants/recipients are free of architectural and communication barriers that restrict access or use by individuals with disabilities.

A. Submit the following information on all facilities used by applicants/recipients:

1. List all offices, including district, satellite, one-stop, and shared offices, showing addresses and programs provided. Indicate if these facilities are county owned or leased. In leased offices, indicate whether you have executed an Assurance of Compliance Agreement, a contract with equivalent language, or a Memorandum of Understanding with the building owner which includes contractual provisions for compliance with all civil rights laws and regulations.
2. Describe building accessibility by means of public transportation to county buildings and other offices applicants/recipients must visit.
3. List any offices that are inaccessible, including street addresses and programs provided. Describe the problem that prohibits accessibility for each location and the plans for correction or alternative methods for providing the program, service or activity, including signage or other effective notification to indicate accessibility by alternative method.

B. Provide a list of all facilities, including address and programs provides, which are or were accessed by applicants/recipients that:

1. Were closed during the previous plan year;
2. Are expected to be closed during the current plan year;
3. Are expected to be relocated or opened during the current plan year.

C. Section 21-109.2 requires that in determining the location of a facility, counties shall not make selections which have the effect of excluding individuals from services or programs. For any new or relocated offices, list policy and procedure for ensuring the following:

1. Services are provided in a manner equally as effective as were provided in the central facility;
2. A determination is made regarding other alternative services that will remain in the area and the effect of the proposed relocation on the community;
3. The availability of transportation (public and private) used by the recipient population and;
4. A building is selected that is accessible to individuals with disabilities and persons who are elderly.

## **Section XI. Staff Development and Training**

Section 21-117 requires staff development and civil rights training. All public contact employees, as well as contractors, subcontractors, or vendors, must be provided cultural awareness and Division 21 training. Provide the following information on civil rights and cultural awareness training conducted during the period of your prior year's Civil Rights Plan update. This should include orientation for new employees, ongoing training by the county, University of California at Davis, CDSS, etc.

- A. List each civil rights and cultural awareness training module, providing the following information:
1. Type of training and whether training was mandatory or optional;
  2. Contents of training, either an outline or list of subjects covered or a copy of the training module;
  3. Description of how training on civil rights requirements addresses specific programs, such as application of the Multi-Ethnic Placement Act in foster care and permanent placement, interpreter services in the Cash Assistance Program for Immigrants, and auxiliary aids and services for participants in employment training programs in CalWORKs;
  4. Date(s) of training;
  5. Who provided training (e.g., University of California at Davis, county, CDSS);
  6. Number and classifications of public contact staff attending, including subcontractor staff;
  7. Hours of training;
  8. How often training is provided;
  9. How effectiveness of the training has been tested; and
  10. If training was not provided, the reasons why not.
- B. Describe plan for training proposed during the effective dates covered by this Civil Rights Plan update.
- C. Describe plan for providing "make-up" training to those staff members who did not attend the previous session.

## **Section XII. Discrimination Complaint Procedure**

Section 21-203 outlines in detail the requirements for processing discrimination complaints. Describe your policy and procedure for training staff in these procedures, and where the policies and procedures are maintained for staff reference. Describe your policy and procedures for ensuring that all applicants/recipients, including non-English-speaking and limited-English-proficient applicants/recipients as well as individuals having disabilities and individuals who cannot read or write, receive information about how to file a discrimination complaint and that they are provided with complaint forms in their primary language or alternative methods as required by Division 21. Complaint procedures for contractors should have been addressed in Section VII.

If your discrimination complaint procedure was filed in your original Compliance Plan, you do not need to resubmit it each year unless there has been a change from the original.

### **Section XIII. Discrimination Complaint Log**

Section 21-203.21 requires counties to maintain a control log in which all complaints of discrimination are entered by year and date the complaint was received. Provide a listing based on the control log, including the date complaint was received, CDSS/CRB case number, basis of complaint, nature of complaint, programs involved, whether the complaint was resolved prior to entering the investigation process, the date the investigation was completed or date the complaint was resolved, and the resolution and disposition status. The period of time covered should be the Compliance Plan year.

### **Section XIV. Self Monitoring**

Describe how the county is monitoring itself for compliance with civil rights laws and regulations, addressing the following:

1. Identify any barriers to civil rights compliance that were encountered in the past year.
2. Identify any problems encountered in the last year and describe how they were resolved.
3. Describe any policies and procedures that are going to be or have been implemented to ensure that problems do not recur.

### **Section XV. Non-Mandated Civil Rights Programs and Activities**

Include in this section information on any non-mandated civil rights-related programs, outreach programs, or activities, etc., your county has developed, whether ongoing or provided during the Compliance Plan update year. Advise if additional programs are needed or would be provided if funding were available.

Describe any promising practices or special successes your county has experienced during the year related to civil rights compliance.

### **Section XVI. Technical Assistance**

Describe any technical assistance needed by the county to help ensure compliance with civil rights requirements. Such assistance could include helping to develop a monitoring plan for vendors and subcontractors, assisting with the development of or reviewing any training modules, assistance with adjustments to or development of a training program.