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DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

January 10, 2011

Patricia S. Ploehn, Director
Los Angeles County Department of Children & Family Services
425 Shatto Place, Room 600
Los Angeles, CA 90020

Dear Ms. Ploehn:

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 June 7-10, 2010. 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. Per the Governor's Executive Order S-08-09, all compliance reviews (and corresponding CAPs) performed after January 2008 will be posted on the state's Reporting Government Transparency website.

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, Acting Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Lynne Bowles Condon, Civil Rights Coordinator,

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
County of Los Angeles
Department of Children and Family Services
Conducted June 7-10, 2010**

**California Department of Social Services
Human Rights and Community Services Division**

**Civil Rights Bureau
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Reviewers

**Elsa Garcia
And
Tiffany Marsh**

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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 Los Angeles County Department of Children and Family Services (LADCFS) 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 June 7-10, 2010. An exit interview was held on June 11, 2010, 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)
Torrance Office	2325 Crenshaw Blvd. Torrance, CA 90501	ER, FM/R	Spanish
Wateridge Office	5110 W. Gold Leaf Circle Los Angeles, CA 90056	ER	Spanish
Compton West Office	11539 Hawthorne Blvd. Hawthorne, CA 90250	ER, FM/R	Spanish
Metro North Office	3075 Wilshire Blvd. Los Angeles, CA 90010	ER, FM/R	Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2009-10 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
Children Social Workers	15	8
Receptionist/Screeners	4	3
Total	19	11

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	12
Non-English or limited-English speakers' case files reviewed	134
Languages of clients' cases	Spanish

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	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?				N/A
Does the county have extended hours to accommodate clients?	X			CSW's can make home visits early mornings and weekends if needed. There is a 24 hr hotline available.
Can applicants access services when they cannot go to the office?	X			Applicants can access services through LADCFS website, and by calling 211 LA.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Awareness is made through Community Organizations.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)?	X			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			Emergency Response workers provide families with the Pub 13 at first contact and explain it to them.
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, Ukrainian, and 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			
Was the Pub 13 available in large print (English and Spanish), audio cassette and Braille?		X		The audio version of PUB 13 was not available at 3075 Wilshire Blvd. Office.
Were the current versions of the required posters present in the lobbies?	X			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?		X		Some of the staff interviewed did not know who the CRC was or the locations of poster with the CRC contact information.
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		At the 2325 Crenshaw Office the instructional and directional signage was not in threshold language (Spanish).

B. Corrective Actions

Informational Element	Corrective Action Required
Auxiliary aids	LADCFS 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
Directional signage	LADCFS shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and that where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages. Div. 21-107.212 and .24

C. Recommendation

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"	03/07
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

1. Facility Location: 2325 Crenshaw Blvd., Torrance

Facility Element	Findings	Corrective Action
Parking	<p>There was no "Unauthorized Parking" sign at entrance to off-street accessible parking.</p> <p>The van-accessible sign did not have the additional sign "Minimum Fine \$250.00".</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>For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133</p>

	<p>Two of the accessible parking spaces and one van-accessible parking space are too narrow in width at 8'7", 8'5", and 8'9".</p> <p>Van-Accessible access aisle is too narrow at 7'11".</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>
Main Entrance	There is no International Symbol of Accessibility (ISA) sign posted at main entrance.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.1) pp 186, 394
Client lobby	Lobby counter is too high at 41 ½".	Height of accessible tables or counters is between 28" – 34" from floor finish. (CA T24 1122B.4, ADA 4.32.4) p 388
Instructional and Directional signage	Not all instructional and directional signs to clients are in threshold language (Spanish).	All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants /recipients may request aid or services in their primary language. (Div 21.107-212)

Men's Restroom	<p>There is no wall sign adjacent to the latch outside the door.</p> <p>Pipes under sink need to be securely insulated.</p> <p>Soap dispenser is too high at 48 ½”.</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>Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.4.7.1, ADA 4.24.6) p 343</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40”. (CA T24 1115B.8.3, ADA 4.23.7) p 294</p>
Women's Restroom	Pipes under sink need to be securely insulated.	Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.4.7.1, ADA 4.24.6) p 343

	<p>Soap dispenser is too high at 48 ½".</p> <p>Paper towel dispenser is too high at 45".</p>	<p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p 294</p>
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2. Facility Location: 5110 Goldleaf Circle, Los Angeles

Facility Element	Findings	Corrective Action
Main Entrance	There is no ISA sign posted at main entrance.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.1) pp 186, 394
Lobby Restrooms (Unisex)	<p>Both door's pressure is excessive at 10 lbs. & 9 lbs.</p> <p>Pipes under sink need to be securely insulated.</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>Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.4.7.1, ADA 4.24.6) p 343</p>
Men's Restroom	<p><u>2nd Floor:</u> The door sign did not have the Grade 2 Braille. There is no wall signage adjacent to the latch outside the door.</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</p>

	<p>Interior door pressure is excessive at 15 lbs.</p> <p>Pipes under sink need to be securely insulated.</p> <p>Urinal is too high at 18".</p> <p><u>3rd Floor:</u> The door sign is too high at 64" and did not have the Grade 2 Braille.</p> <p>There is no wall sign adjacent to the latch outside the door.</p>	<p>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>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201</p> <p>Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.4.7.1, ADA 4.24.6) p 343</p> <p>Rim height shall be a maximum of 17" in height above the floor. (CA T24 1115B.2.1.1.1, ADA 4.18.2) p 285</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,</p>
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<p>Women's Restroom</p>	<p>Interior door pressure is excessive at 8 lbs.</p> <p><u>2nd Floor:</u> The door sign did not have the Grade 2 Braille. There is no accessible signage on the wall adjacent to the latch outside the door.</p> <p>Interior door pressure is excessive at 15 lbs.</p> <p><u>3rd Floor:</u> The accessible signage on door is too high at 66". The door sign did not have the Grade 2 Braille.</p>	<p>preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 281</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>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>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201</p> <p>Door sign and wall sign shall be 60" above the floor to the center line of sign.</p>
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	There is no wall sign adjacent to the latch outside the door.	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
Emergency Alarms	There is no visual emergency warning system to alert the hearing impaired.	<p>If emergency warning systems are provided, they should include both audible alarms and visual alarms.</p> <p>If emergency warning systems are required, they shall activate a means of warning the hearing impaired. (CA T24 1114B.2.2, ADA 4.28.1) p 243</p>
Drinking Fountain	Fountain does not have either a prescribed mat or wing walls as identified in code.	<p>Protruding objects <u>in alcoves</u> can not project more than 4" into walls, corridors, passageways, or aisles. (CA T24 1117B.1.3) p 232</p> <p>If it would create an unreasonable hardship, the water fountain may project into the path of travel under the following conditions:</p> <p>The floor path shall be textured to be identifiable by a blind person using a cane. The minimum textured area shall extend from the wall supporting the water fountain to 12" beyond the front edge of the water fountain and 12" beyond each side of the water fountain., or</p>

		Wing walls project from the supporting wall at least as far as the water fountain to within 6" of the surface of the path of travel with a min. 32" clearance between the walls." (CA T24 1117B.1.3) pp 232-233
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3. Facility Location: 11539 Hawthorne Blvd., Hawthorne

Facility Element	Findings	Corrective Action
Main Entrance	Exterior door pressure is excessive at 14 lbs. Bottom of exterior door does not have the 10" smooth surface.	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 201 Force to open fire door, minimum allowable not to exceed 15 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(1)) p 201 The bottom 10" of all doors except automatic and sliding shall have smooth, uninterrupted surface to allow the door to be opened by a wheelchair footrest without creating a trap or hazardous condition. (CA T24 1133B.2.6) p 203
Unisex Restroom	There is no wall sign adjacent to the latch outside the door.	Door sign and wall sign shall be 60" above the floor to the center line of sign. 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

Drinking Fountain	Fountain does not have either a prescribed mat or wing walls as identified in code.	<p>Protruding objects <u>in alcoves</u> can not project more than 4" into walls, corridors, passageways, or aisles. (CA T24 1117B.1.3) p 232</p> <p>If it would create an unreasonable hardship, the water fountain may project into the path of travel under the following conditions:</p> <p>The floor path shall be textured to be identifiable by a blind person using a cane. The minimum textured area shall extend from the wall supporting the water fountain to 12" beyond the front edge of the water fountain and 12" beyond each side of the water fountain., or</p> <p>Wing walls project from the supporting wall at least as far as the water fountain to within 6" of the surface of the path of travel with a min. 32" clearance between the walls." (CA T24 1117B.1.3) pp 232-233</p>
Men's Restroom	Accessible signage on door is too high at 67" and wall sign to high at 62 ½".	<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>

	Dispensers are too high: soap at 51", mirror base at 51", paper towel at 65".	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p 294
Women's Restroom	<p>Accessible signage on door is too high at 67" and wall sign is too high at 62".</p> <p>Dispensers are too high: soap at 52", seat protector at 63", mirror base at 51", paper towel at 65 1/2".</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>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p 294</p>

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	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			Emergency Response (ER) staff identifies language at time of referral by referring party.
Does the county use a primary language form?	X			Form 485
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			
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			Once language of family is identified a bilingual worker is assigned or interpreter called as needed.
Is there a delay in providing services?		X		

Question	Yes	No	Some-times	Comments
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			LADCFS does not have a language line. A bilingual worker list is available for all county staff and if needed they can request an interpreter through other resources.
Are county interpreters determined to be competent?	X			Bilingual staff is certified through an exam process.
Does the county have adequate interpreter services?		X		Based on staff interviews and Program Manager surveys, some staff feel there are not adequate bilingual workers to serve the Spanish speaking families.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		
Does the county allow the client to provide his or her own interpreter?	X			If client prefers to utilize their own interpreter, county will allow them. However, county will still have a bilingual worker present to ensure accuracy.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			Same as above.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			Case files reviewed revealed CDSS translated forms are being used in clients' primary languages.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			
Does the county provide auxiliary aids and	X			Refer client to the Deaf Unit; use large print material.

Question	Yes	No	Some-times	Comments
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)?				
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			
Does the county offer screening for learning disabilities?	X			Refer client to Medical Unit
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
Bilingual Staff	LADCFS shall ensure that a sufficient number of qualified bilingual employees shall be assigned to positions and locations serving a substantial number of non-English-speaking persons. Div. 21-115.1

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
Ethnic origin documentation	ER referral form
Primary language documentation	Form 485 and/or ER referral
Method of providing bilingual services and documentation	CWS-CMS
Client provided own interpreter	Case notes
Method to inform client of potential problem using own interpreter	DCFS74A
Release of information to Interpreter	DCFS 74A
Individual's acceptance or refusal of written material offered in primary language	Form 485
Documentation of minor used as interpreter	None found in sample cases reviewed.
Documentation of circumstances for using minor interpreter temporarily	None found in sample cases reviewed.

Documented Item	Children's Services
Translated notice of actions (NOA) contain translated inserts	CWS-CMS
Method of identifying client's disability	None found in sample cases reviewed.
Method of documenting a client's request for auxiliary aids and services	None found in sample cases reviewed.

C. Recommendation

None

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?		X		Majority of staff interviewed stated they do not receive continued Division 21 training. Some staff couldn't remember receiving training at all on Div 21 (Civil Rights).
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?		X		
Does the county provide employees Cultural Awareness Training?		X		Some of the staff interviewed stated they have not received cultural awareness training.

Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?		X		Not all staff interviewed knew or understood what MEPA was.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions

Training Area	Corrective Action
Division 21, Civil Rights Training	LADCFS shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1
Cultural Awareness Training	LADCFS 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
MEPA Training for Children's Social Workers	LADCFS 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

Based on the responses from this compliance review it is recommended that staff be reminded in unit meetings to make available time to complete the ongoing mandated training classes offered in Division 21, Cultural Awareness and MEPA.

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	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?		X		Staff interviewed was not able to differentiate the type of complaints.
Did the employees know who the Civil Rights Coordinator is?		X		Staff interviewed was unable to identify or name Civil Rights Coordinator.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?		X		Staff interviewed was not aware of location of required posters with Civil Rights Coordinator's name and address.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Corrective Action

Element	Corrective Action
Discrimination Process	LADCFS shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203
Civil Rights Coordinator	L ADCFS shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum,

	where the information can be located. Div. 21-117 and 21-107.21
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D. Recommendation

Enhancement of training on Staff Development should include discussion of the differences in types of client complaints and processes to resolve those complaints, to ensure staff are able to differentiate between civil rights complaints/process and other types of complaints. Also, unit briefings to remind staff of who their Civil Rights Coordinator (CRC) contact is and where the posters are located containing the CRC contact information.

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Los Angeles County Department of Children and Family Services Civil Rights Compliance Plan for the period November 1, 2009 through October 31, 2010, was received on September 3, 2009. It is approved as submitted.

X. CONCLUSION

The CDSS reviewers found the LADCFS staff welcoming, informative, and very supportive. Particular thanks to Brynda Thomas, Administrative Assistant II, for organizing and coordinating the details of the review. Staffs at each District Office were friendly and helpful.

The CDSS found the Los Angeles County Department of Children and Family Services in adequate compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

However, the Los Angeles County Department of Children and Family Services 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.