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DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

September 8, 2011

Richard J. Burton, M.D., M.P.H., Director
Placer County Health & Human Services Agency
3091 County Center Drive
Auburn, CA 95603

Dear Mr. Burton:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office, Ms. Cabrera, during the course of the Civil Rights Compliance Review of March 1-2, 2011. Enclosed is the final report on the review.

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 60 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 enclosed 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. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>

If you need technical assistance in the development of your CAP, please feel free to contact Ms. Cabrera (916) 654-1047. You may also contact her by e-mail at claudia.cabrera@dss.ca.gov.

Sincerely,

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

Enclosure

c: Susan Kimbley, Civil Rights Coordinator

Linda Patterson, Branch Chief

CDSS CalFresh Program

Mike Papin, Chief
CalFresh Policy Bureau

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
Placer County Department of Human Services
Conducted March 1-2, 2011**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
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Reviewer

Claudia Cabrera

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Placer County Department of Human Services with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted March 1-2, 2011. An exit interview was held on March 2, 2011 with the following staff to review the findings.

NAME	PROGRAM	OFFICE
Susan Kimbley	Human Services	Human Services-Auburn
Twylla Abrahamson	Children's System of Care	Enterprise-Auburn
Steve Martinson	Children's System of Care	Enterprise-Auburn
Eldin Lewis	IHSS	Cirby Hills-Roseville
Janelle Bloomdale	IHSS	Dewitt-Auburn
Margaret Chamners	IHSS	Enterprise-Auburn
Michelle Johnson	PCHS MCU	Enterprise-Auburn

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)
Placer County Human Services	101 Cirby Hills Drive, Roseville, CA	IHSS	None
Placer County Human Services	1000 Sunset Blvd, Suite 220, Rocklin, CA	CalWORKs/CalFresh	Spanish
Children's System of Care	11716 Enterprise Drive, Auburn, CA	Children's Services	Spanish

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2011 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	4	Spanish
Children Social Workers	2	
Adult Program Workers	2	
Receptionist/Screeners	3	Russian
Total	11	

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	0
Non-English or limited-English speakers' case files reviewed	25
Languages of clients' cases	Spanish, ASL, Russian, Farsi, Vietnamese, Tagalog

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?	X			Staff can accommodate clients by allowing CalFresh applications to be mailed in, schedule appointments after hours, upon supervisor approval, conduct over-the-phone interviews or conduct home visits.
Does the county have extended hours to accommodate clients?		X		Office hours are M-F, 8:00 am – 5:00 pm.
Can applicants access services when they cannot go to the office?	X			Children's Services has a 24hr access phone line available, IHSS clients can request a home visit, CalFresh clients can utilize "benefits

				CalWIN” to check their benefits or submit an online application.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Placer County will set up booths at job fairs and distribute pamphlets to their local hospital and community centers.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet “Your Rights Under California Welfare Programs” (Pub 13)?	X			
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			PUB 13’s are given to all clients during initial application and re-certification. For IHSS and Children’s Services, the PUB 13 is given to clients during their initial contact and home visit.
Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukranian, Vietnamese?	X			All three offices reviewed had a binder titled “Civil Rights” that included civil rights materials; such as, copies of the PUB 13’s in all available languages, information on how to contact an ASL or bilingual interpreter, and complaint forms GEN 1179. Binders are kept with the receptionist and materials are available upon request.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
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		Copies of the PUB 13 are available in all languages and kept in the Civil Rights binders.
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?		X		The IHSS office in Roseville did not have the PUB 13 available in Braille.
Were the current versions of the required posters present in the lobbies?		X		The IHSS office in Roseville and the Children's System of Care office in Auburn both had outdated copies of the PUB 86 "Everyone is Different but Equal under the Law" posters.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?			X	Out of the 11 staff interviewed, one was unaware of who the CRC was and of the location of the PUB 86 poster.
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		Entrance through the west side of the building does not have identifying information directing clients to the human services office on the 2 nd floor. As well as no identifying information directing clients to the elevators in Spanish, the threshold language.

B. Corrective Actions

Informational Element	Corrective Action Required
Auxiliary aids	Placer County Human Services 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
Posters	Placer County Human Services shall ensure that the most current version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms. Div. 21-107.211
Directional signage	Placer County Human Services 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 or 03/10
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact the Civil Rights Bureau to receive the most recent versions, or download the Pub 13 from the CRB website http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

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

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

Facility Location: 101 Cirby Hills Drive, Roseville, CA

Facility Element	Findings	Corrective Action
Parking	<p>There is no "unauthorized parking" signage at both entrances to off-street accessible parking.</p> <p>There is no additional signage below the symbol sign.</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</p>

	<p>The words "No Parking" painted on the pavement are faded in access aisles and need to be re-painted.</p>	<p>an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.3.2) p 135</p>
Client lobby	<p>Exterior doors to main entrance:</p> <p>Right door is excessive at 8 lbs. Interior doors to main entrance:</p> <p>Left door is excessive at 12 lbs and Right door is excessive at 11 lbs.</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 201</p> <p>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</p>
Telephone	<p>The public pay telephone does not have a volume control.</p>	<p>At least one in each telephone bank and a minimum of 25% of the total number of public telephones shall be equipped with a volume control and shall be hearing aid compatible. (CA T24 1117B.2.8, ADA 4.1.3.17(b)) p 273</p> <p>Telephones with volume control shall be hearing aid compatible and identified with a sign. (CA T24 1117B.2.8 & 1117B.5.8.3, ADA 4.1.3.17(b)) p 273</p>
Unisex Restroom	<p>Door pressure is excessive at 10 lbs.</p> <p>Soap dispenser is high at 42 ½".</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>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least</p>

		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
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B. Recommendation

None

C. Facility Location: 1000 Sunset Blvd, Rocklin, CA

Facility Element	Findings	Corrective Action
Exterior entrance	There is no ISA sign posted at accessible entrance.	Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p 396
Elevator	The public elevator is not marked as accessible.	Entrances that are accessible to and usable by persons with disabilities are identified with at least 1 International Symbol of Accessibility. Additional directional signs using the symbol are visible along approaching pedestrian ways. (CA T24 1117.B.5.8.1.2) p 251
Restroom	Note: both restroom doors were identified as fire doors. Men's: Door pressure is excessive at 17 lbs. Women's: Door pressure is excessive at 18 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201

D. Recommendation

None

E. Facility Location: 11716 Enterprise Drive, Auburn, CA

Facility Element	Findings	Corrective Action
Exterior entrance	Door pressure is excessive at 20lbs.	<p>The maximum force required to push or pull open a door shall comply with the following:</p> <p>Exterior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(A)) p 207</p> <p>Interior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)) (B)) p 207</p>
Outside signage	There is no signage clearly identifying the office.	<p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction where the accessible route of travel diverges from the regular circulation path along or leading to an accessible route of travel, entrance or facility.</p> <p>(CA T24 1127B.3) p 191 The International Symbol of Accessibility shall be the standard used to identify facilities that are accessible to and usable by physically disabled persons as set forth in these building standards and as specifically required in this section. (CA T 24 117B.5.8.1) (ADA 4.1.2(7)) p 400 Signs shall indicate the</p>

		direction to accessible building entrances and facilities, (CA T24 1117B.3) p 191, 400
Client interview rooms	There is no signage identifying the interview room that is designated as accessible.	Where permanent identification is provided for rooms and spaces, signs are installed on the wall adjacent to the latch outside of the door. (CA T24 1117B.5.7) (ADA 4.30.6) p 404 Mounting height is 60" above the finished floor to the center of the sign. (CA T24 1117B.5.7) (ADA 4.30.6) p 404
Restroom	<p>Men's Restroom:</p> <p>Toilet seat protector is high at 45".</p> <p>Toilet tissue dispenser is located too far at 20" from the front edge of the toilet seat.</p> <p>Women's Restroom:</p> <p>There is no accessible signage on the door.</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.8.1.1) (ADA 4.19.6) p 296, 299, 304</p> <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 299, 305</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</p>

	<p>Door pressure is excessive at 20lbs.</p> <p>There is no adequate turning space.</p> <p>Toilet seat protector is too high at 46".</p> <p>Toilet tissue dispenser is</p>	<p>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 287</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 287</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 207</p> <p>There shall be a 36" minimum t-shaped traffic way. (CA T24 1118B.3, ADA 4.2.3) p 236</p> <p>There shall be a 60" minimum circular turning diameter. (CA T24 1118B.3, ADA 4.2.3) p 236</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 304</p> <p>Mirror (CA T 24 115B.8.1.1) (ADA 4.19.6) pp 296, 299</p> <p>Toilet tissues dispensers are</p>
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	located too far at 20" from the front edge of the toilet seat.	located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 299, 305
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F. Recommendation

None

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			Intake worker identifies the client's language needs and will document in case comments. IHSS and Children's services identify the client's language

Question	Yes	No	Some-times	Comments
				upon review of referral.
Does the county use a primary language form?	X			CalFresh and CalWORKs use the "Language Preference and Auxiliary Aid ID Form", ALL 1388 and Children's Services use the "Care form" 15A.
Does the client self-declare on this form?	X			Clients fill out form ALL 1388 and Care 15A.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			If no bilingual worker is available, staff will use Language Line for over-the-phone interpretive services or Language World for face-to-face interpreters.
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			Staff are aware of how to contact an interpreter through Language Line or Language World.
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			See above.
Are county interpreters determined to be competent?	X			All county interpreters are certified.
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?	X			Staff will only allow a minor to be used as an interpreter to help identify the client's primary language or to communicate information regarding an

Question	Yes	No	Some-times	Comments
				appointment when an interpreter will be present.
Does the county allow the client to provide his or her own interpreter?	X			Children Services Staff interviewed stated that it is often preferred not to use a family member during their initial contact due to loyalty issues but will allow family members to be used after a case has been established. All other staff stated that they would first make an offer for a county provided interpreter and if the client declined, would allow them to use their own interpreter. This is all documented in case comments.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			Staff will pay attention to signs of difficulty with the client-provided interpreter.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			
Is the information that is to be inserted into NOA translated into the client's primary language?	X			
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			Staff can provide TTY for a client with a hearing impairment; schedule an ASL interpreter through Norcal; offer large print materials off a magnifying glass; or read forms for the clients and help assist in filling out forms.
Does the county identify	X			Staff can assist a client who

Question	Yes	No	Some-times	Comments
and assist the client who has learning disabilities or a client who cannot read or write?				cannot read or write by reading aloud the forms and materials and assisting in filling out forms.
Does the county offer screening for learning disabilities?		X		Staff were unaware of any screening for learning disabilities.
Is there an established process for offering screening?		X		
Is the client identified as having a learning disability referred for evaluation?		X		

B. Corrective Actions

None

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	IHSS	CalWORKs	Non-Assistance CalFresh
Ethnic origin documentation	Care 015-A	SOC 295	DFA 285	SAWS I
Primary language documentation	Care 015-A	SOC 295, Language Preference and Auxiliary Aid ID Form, ALL 1388	Language Preference and Auxiliary Aid ID Form, ALL 1388	Language Preference and Auxiliary Aid ID Form, ALL 1388, CalWIN case summary

Documented Item	Children's Services	IHSS	CalWORKs	Non-Assistance CalFresh
				page
Method of providing bilingual services and documentation	Care 015-A	Case narrative	Case comments	Case comments
Client provided own interpreter	None found in cases reviewed	Case narrative	None found in cases reviewed	Case comments
Method to inform client of potential problem using own interpreter	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed	None found in case comments
Release of information to Interpreter	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed	None found in case comments
Individual's acceptance or refusal of written material offered in primary language	Care 015-A	Language Preference and Auxiliary Aid ID Form, ALL 1388	Language Preference and Auxiliary Aid ID Form, ALL 1388	Language Preference and Auxiliary Aid ID Form, ALL 1388
Documentation of minor used as interpreter	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed
Documentation of circumstances for using minor interpreter temporarily	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed
Translated notice of actions (NOA) contain translated inserts	Found in case file, when requested by cleint	Case file	Found in case file, when requested by cleint	Found in case file, when requested by cleint
Method of identifying client's disability	Care 438 and in case file via Norcal Services for the Deaf and Hard of Hearing	IHSS Face Sheet	Language Preference and Auxiliary Aid ID Form, ALL 1388	Language Preference and Auxiliary Aid ID Form, ALL 1388
Method of documenting a client's request for	In case file via Norcal Services for the	Language Preference and Auxiliary Aid ID	Language Preference and Auxiliary	Language Preference and Auxiliary

Documented Item	Children's Services	IHSS	CalWORKs	Non-Assistance CalFresh
auxiliary aids and services	Deaf and Hard of Hearing	Form, ALL 1388	Aid ID Form, ALL 1388	Aid ID Form, ALL 1388

B. Corrective Actions

Areas of Action	Corrective Action
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23
Temporary use of a minor (under 18 years of age) as an interpreter	When a minor (under 18 years of age) is used as an interpreter, the CWD shall so document the circumstances requiring <u>temporary</u> use of minors in the case record. Div. 21-116.22 Only under extenuating circumstances or at the specific request of the applicant/recipient shall a CWD allow a minor (under the age of 18 years) to temporarily act as an interpreter.
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24

C. Recommendation

The Children's Services case files reviewed were found to be compliant in documenting instances where bilingual interpreters were used or when accommodations were requested. Great job!

The IHSS office had some cases where a family member was used as the clients interpreter, yet no documentation was found stating that the client was informed of the possibility for ineffective communication using his/her own interpreter. This was also found to be the case with CalFresh and CalWORKs cases. During the staff interviews, several staff stated that it is county policy to have the client fill out a release of information form as

well as the Self-Provided Interpreter Form, ALL 1387. This was not found to be county practice. Staff should be reminded of this ALL 1387 form available for use when a client chooses to use their own interpreter.

There were also several cases reviewed where there was no documentation of interpretive services being provided to the non-English speaking client. Workers are not consistently documenting how interpretive services are being provided during the initial interview/contact, home visits or re-verifications/re-certifications for clients who are non-English speaking. Please refer to ACL No. 08-65

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			Staff receive Division 21 training annually.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			All staff interviewed were able to identify county policy regarding the procedure for a client wanting to file a discrimination complaint.
Does the county provide employees Cultural Awareness Training?	X			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?		X		The Children Services staff stated that specific training on MEPA had not been offered.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions

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

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			All staff were able to identify the difference between a program, discrimination, and a personnel complaint.
Did the employees know who the Civil Rights Coordinator is?	X			All staff identified Susan Kimbley as the CRC.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?			X	Ten out of the eleven staff interviewed did not know the location of the PUB 86 poster.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Corrective Action

Element	Corrective Action
Civil Rights Coordinator	Placer County 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

C. Recommendation

None

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Placer County Health and Human Services Civil Rights Compliance Plan for the period July 1, 2010 through June 30, 2011, was received on February 2, 2011. It is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the Placer County Health and Human Services staff warm, welcoming, informative and very supportive. Particular thanks to Susan Kimbley, Civil Rights Coordinator, for organizing the details of the review. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Placer County Health and Human Services in satisfactory 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.

The Placer County Health and Human 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.