



CDSS

WILL LIGHTBOURNE
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



EDMUND G. BROWN JR.
GOVERNOR

August 12, 2015

Delfino E. Neira, Director
Fresno County
Department of Social Services
2135 W. Fresno Street, Suite 100
Fresno, CA 93721

Dear Mr. Neira:

This letter is to advise you that the updated Corrective Action Plan you submitted on July 31, 2015 in response to the results of our July 21-25, 2014 Civil Rights Compliance Review is approved.

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

If you have any questions, please contact Ms. Tiffany Marsh at (916) 651-6242 or by e-mail at Tiffany.Marsh@dss.ca.gov.

Sincerely,

Original signed by Bureau Chief

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

c: Annette Morris, Civil Rights Coordinator

Ryan Fruchtenicht, Chief
CalFresh Policy Bureau

Carlos Ocampo, Chief
Field Operations Bureau

Taadhimeda Haynes
Staff Services Manager I

Sysvanh Kabkeo, Chief
CalFresh Management Operations Section
Paul Gardes

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

Kevin Aslanian
Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier
Western Center on Law and Poverty

**CIVIL RIGHTS CORRECTIVE ACTION PLAN
FOR
FRESNO COUNTY
DEPARTMENT OF SOCIAL SERVICES**

Conducted on

July 21-25, 2014

**California Department of Social Services Human Rights
and Community Services Division
Civil Rights Bureau 744 P Street,
M.S. 8-16-70
Sacramento, CA 95814
(916) 654-2107**

Reviewer: 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 Sacramento County Department of Human Assistance 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 July 21, 2014 to July 24, 2014. An exit interview was held on July 25, 2014, 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)
Coalinga Regional Center	311 Coalinga Plaza Drive Coalinga, CA	CalFresh, CalWORKs	Spanish
Crocker Building	2135 Fresno Street Fresno, CA	Children Welfare Services	Spanish
Sequoia Building	3821 N. Clark Street Fresno, CA	Adult Program Services, In-Home Supportive Services	Spanish
Senior Resource Center 2 nd and 4 th Floors	2025 E. Dakota Ave. Fresno, CA	CalFresh	Spanish

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2014-2015 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
- Discussion with community advocate groups. In this review the following organization(s) were contacted for feedback.

Cultural Broker Program
1625 E. Shaw Avenue, #146
Fresno, CA 93710

Centro La Familia
302 Fresno Street, Ste. #102
Fresno, CA 93706

Central California Legal Services
2115 Kern Street, Ste. #1
Fresno, CA 93721

California Rural Legal Assistance
2115 Kern Street, Ste. 370
Fresno, CA 93721

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	10	6
Children Social Workers	4	2
Adult Program Workers	3	1
Receptionist/Screeners	3	1
Total	20	10

Program Manager Surveys

Number of surveys distributed	6
Number of surveys received	6

Reviewed Case Files

English speakers' case files reviewed	18
Non-English or limited-English speakers' case files reviewed	87
Languages of clients' cases	American Sign Language, Arabic, Armenian, Cambodian, Cantonese, Farsi, Hmong, Italian, Lao, Mandarin, Punjabi, Russian, Spanish, Tagalog, Vietnamese,

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 highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XI 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			Regular Office Hours: Monday – Friday 8:00 am – 5:00 pm Staff may schedule appointments before and after regular business hours. There are Kiosks available in designated offices for clients to scan and upload documents pertinent to their case.
Does the county have extended hours to accommodate clients?	X			Coalinga Office hours: Monday through Friday 8:00 am – 4:30 pm and Saturday by appointment only. E. Dakota Office hours: 8:00 am – 5:00 pm. Staff may provide services to clients as late as 7:00 pm.
Can applicants access services when they cannot go to the office?	X			Clients may apply/recertify for benefits by mail, phone, fax, or online at www.mybenefitscalwin.org .

Does the county ensure the awareness of available services for individuals in remote areas?	X			Awareness of services may be obtained from Health Fairs, Elderly Care Book, Community Outreach Centers, Service Call Centers, yellow pages (bilingual ads), www.co.fresno.ca.us , and 2-1-1.
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Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)?	X			
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			Pub 13 is provided and explained thoroughly to clients during appointments.
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, Vietnamese?	X			The Pub 13 pamphlets are displayed in lobby.
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		The Pub 13 in all available languages are displayed in lobby.
Was the Pub 13 available in large print (English and Spanish), audio cassette/CD, and Braille?	X			Large Print available in all languages. These versions of the Pub 13 are available at the front counter or reception desk of reviewed offices.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Were the current versions of the required posters present in the lobbies?	X			Pub 86 (03/07) AD 475B (12/99).
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			

B. Corrective Actions – None

C. Recommendation – None

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”	06/11
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.cdss.ca.gov/civilrights/entres/forms/English/pub13.pdf>.

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: 311 Coalinga Plaza Drive, Coalinga

Facility Element	Findings	Corrective Action
Parking	"Unauthorized Accessible Parking" signage is not displayed at each off-street entrance.	An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8)
	Accessible parking stalls do not display the additional "Min. \$250 Fine" signage.	Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250". (CA T24 11B-502.6.2)
	Accessible parking spaces measured short in length at 17'2".	Car and van parking spaces shall be 18' long min. (CA T24 11B-502.2) (ADA

	Accessible parking spaces need to be repainted due to designated markings faded.	502.2) The parking space shall be marked with an International Symbol of Accessibility...in white on a blue background - a minimum 36" wide x 36" high. (CA T24 11B-502.6.4.1) OR ...in white or a suitable contrasting color (CA T24 11B-502.6.4.2)
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Parking (continued)	Access aisles do not display the necessary words "NO PARKING" painted on the pavement.	*The words "NO PARKING" shall be painted on the surface of each access aisle. (CA T24 11B-502.3.3) This notice shall be painted in white letters a min. of 12" in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3)
Exterior entrance	Force to open both doors excessive at 10-12 lbs.	The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4)
Restroom	Men: Force to open door excessive at 10 lbs. Pipe under the sink need to be securely insulated.	The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5)

	Soap dispenser operable part measure high in height at 48".	Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route. All operable parts, including coin slots, shall be 40" max. above the finish floor. (CA T24 11B-603.5)
Restroom (continued)	<p>Toilet paper dispenser measured too high at 49".</p> <p>Women: Force to open door excessive at 15 lbs.</p> <p>Soap dispenser operable part measure high in height at 48".</p> <p>Toilet paper dispenser measured too high at 49".</p>	<p>If toilet paper dispensers are installed above the side wall grab bar, the outlet of the toilet paper dispenser must be 48" max. above the finish floor and the top of the gripping surface of the grab bar must be 33" min. and 36" max. above the finish floor. (ADA 604.7 (ADVISORY))</p> <p>See above requirement code. (CA T24 11B-309.4) (ADA 309.4)</p> <p>See above requirement code. (CA T24 11B-603.5)</p> <p>See above requirement code. (ADA 604.7 (ADVISORY))</p>

Corrective Action: "Unauthorized parking" and "Min. \$250 Fine" signage was completed in May 2015. Accessible parking spaces length was corrected to 18' long min. in May 2015. Accessible parking spaces and access aisles were

repainted, and “NO Parking” was included in May 2015. Force to open exterior entrance doors was completed May 2015. The pipes in the men’s restroom were insulated in May 2015. Soap dispensers in the men’s and women’s restrooms were corrected to be 40” max. height in May 2015. Toilet paper dispensers in women’s restroom were corrected to 48” max. height in May 2015. All corrections were completed by the property manager, McMahan-Kays, LLC.

2. Facility Location: 2135 Fresno Street, Fresno

Facility Element	Findings	Corrective Action
Parking	<p>“Unauthorized Accessible Parking” signage is not displayed at off-street entrance. (Public is allowed to park in the accessible and flex stall parking spaces located in employee parking.)</p> <p>Accessible parking spaces measured narrow in width ranging from 8’6” to 8’9”.</p>	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CAT24 11B-502.8)</p> <p>*Add car parking... Van Parking Space Min. Dimensions: 12’ wide by 18’ long. (CA T24 11B-502.2) (ADA 502.2)</p> <p>Access aisle min. dimensions: 5’ wide by 18’ long. Fig. 12 (CA T24 11B-502.2) (ADA 4.6.3)</p> <p>Van parking spaces shall be permitted to be 9’ wide (min.) where the access aisle is a min. of 8’ wide. (CA T24 11B-502.2) (ADA 502.2)</p>
Lobby Restroom	Counter exceeds the height required for accessibility at 42”.	The tops of dining surfaces and work surfaces shall be 28” min. and 34” max. above the finish floor or ground. (CA T24 11B-902.3) (ADA 902.3)

	Men/Women: Force to open door excessive at 7 lbs.	The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4)
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Corrective Action: “Unauthorized Access Parking” signage was completed in July 2015. Accessible parking spaces width was corrected in July 2015. Lobby counter height is not yet corrected. Staff are coming out to provide direct assistance, as well as providing clipboards for use. Force to open doors to the men’s and women’s restrooms was corrected April 2015. All corrections completed by the County’s General Services Administration (GSA).

3. Facility Location: 3821 N. Clark Street, Fresno

Facility Element	Findings	Corrective Action
Parking	<p>No additional signage of “Minimum Fine \$250” displayed below the sign of accessible parking.</p> <p>Accessible parking spaces measured short in length at 17’.</p> <p>Suggest repainting parking spaces pavement accessible signage.</p>	<p>Additional language or an additional sign below the International Symbol of Accessibility shall state “Minimum Fine \$250”. (CA T24 11B-502.6.2)</p> <p>Car ... parking spaces shall be 18’ long min. (CA T24 11B-502.2) (ADA 502.2)</p> <p>The parking space shall be marked with an International Symbol of Accessibility...in white on a blue background - a minimum 36” wide x 36” high. (CA T24 11B-502.6.4.1) OR ...in white or a suitable contrasting color (CA T24 11B-502.6.4.2)</p>

Emergency alarms	There is not an audible and/or visual emergency indicator mounted in public area.	Audible alarm notification shall be provided and emit a distinctive sound that is not to be used for any purpose other than that of a fire alarm. (NFPA 72) (CA T24 907.5.2.1) Visible alarm notification appliances shall be provided in public use areas and common use areas, including but not limited to: (CA T24 907.5.2.3.1)
Emergency alarms (continued)		<ul style="list-style-type: none"> - Sanitary facilities including restrooms, bathrooms and shower rooms - Corridors - Multipurpose rooms - Occupied rooms where ambient noise impairs hearing of the fire alarms - Lobbies - Meeting rooms - Classrooms (NFPA 72 [CA T24] 907.9.1.1)

Corrective Action: “Min. \$250 Fine” signage was completed in May 2015. Accessible parking spaces length was corrected to 18’ long min. in May 2015. In regard to the Emergency Alarms, please see attached documentation which was provided by the California Fire Life-Safety Technician for the Fresno-Madera Area Agency on Aging (FMAAA), which owns the building.

4. Facility Location: 2025 E. Dakota, Avenue, Fresno

Facility Element	Findings	Corrective Action
Restroom	Men: 1 st Floor: Toilet paper dispenser measured at 14” center-line. 4 th Floor: Force to open	Toilet paper dispensers shall be 7” min. and 9” max. in front of the water closet measured to the centerline of the dispenser. (CA T24 11B-604.7) (ADA 604.7) The force required to activate

	door excessive at 10 lbs.	operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4)
	Women: 4 th Floor: Force to open door excessive at 10 lbs.	The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4)
	Paper towel dispenser operable part measured high at 50" in height.	Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route. All operable parts, including coin slots, shall be 40" max. above the finish floor. (CA T24 11B-603.5)

- A. Recommendation** – In the Women’s restroom, the door swing inside the accessible stall to meet the requirements of minimum maneuvering space of 60” wide and 48” deep in front of the accessible stall without obstruction.

Corrective Action: The toilet paper dispenser in the 1st floor men’s restroom was corrected to be within the 7” to 9” requirement in April 2015. Door pressure adjustments to the 4th floor men’s and women’s restrooms were completed in April 2015. The paper towel dispenser in the 4th floor women’s restroom was corrected to 40” max. height in April 2015. All corrections were completed by FMAAA, which owns the building.

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			Clients self-declare preferred language by Form 2229, verbal communication, own interpreter or I Speak Card at point of contact.
Does the county use a primary language form?	X			Primary Language Form (Form 2229) determines verbal and written preferences.
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Certified bilingual staff and Language Service Line.
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			Clients will speak with bilingual staff or Language Service Line.
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			Language Service Line.
Are county interpreters determined to be competent?	X			Certified by Fresno County Administrative Office Personnel Services Division.
Does the county have adequate interpreter services?	X			
Question	Yes	No	Some-times	Comments
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			Client and client provided interpreter must sign Clients Waiver of Free Interpreter Services Form (Form 2229A).
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			
Does the county use the CDSS-translated forms in the clients' primary languages?	X			Forms are continually being translated to meet the languages needed.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			If information is not available in the preferred language, staff must offer and provide interpretive services.

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			
Does the county identify a client with a disability (physical, mental, or learning)?	X			Staff may ask if there are any accommodations needed. Clients are to self-disclose their disability.
Does the county provide reasonable accommodations to clients with a disability (physical, mental, or learning)?	X			Staff will provide the necessary accommodations to ensure client's ability to participate in programs.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			Staff will assist client with reading and writing.
Does the county offer screening for learning disabilities?	X			Screenings are offered in the Welfare to Work program.
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

C. Recommendation – 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	Child Welfare Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh	Program Fraud Cases
Ethnic origin documentation	CWS/CMS: Demographic Summary	CMIPS: Case Summary	CalWIN: Demographics	CalWIN: Demographics	Investigation Case Cover Sheet
Primary language documentation	CWS/CMS: Demographic Summary	Form 2229, Case Notes	CalWIN: Case Comments	CalWIN: Case Comments	Investigation Case Cover Sheet
Method of Providing bilingual services and documentation	Case Narrative	Form 2229, Case Notes	CalWIN: Case Comments	CalWIN: Case Comments	Noted in Investigation Report
Client provided own interpreter	Case Narrative	IHSS: Case Notes APS: None found in case	CalWIN: Case Comments	CalWIN: Case Comments	None found in case sample
Method to inform client of potential problem using own interpreter	None found in case sample	None found in case sample	Form 2229A	Form 2229A	None found in case sample
Release of information to Interpreter	Form 2229A Case Narrative	IHSS: Form 2229A APS: None found in case	Form 2229A	Form 2229A	None found in case sample

Documented Item	Child Welfare Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh	Program Fraud Cases
Individual's acceptance or refusal of written material offered in primary language	Case Narrative	Case Notes	Case Comments, Form 2229	Case Comments, Form 2229	None found in case sample
Documentation of minor used as interpreter	None found in case sample	None found in case sample	None found in case sample	None found in case sample	None found in case sample
Documentation of circumstance for using minor interpreter	None found in case sample	None found in case sample	None found in case sample	None found in case sample	None found in case sample
Method of identifying client's disability	Case Narrative	Case Notes	None found in case sample	None found in case sample	None found in case sample

B. Corrective Actions – None

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			Training offered through UC Davis Civil Rights Training and Civil Right E-Quiz online.
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			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions – None

C. Recommendation – None

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	5 of the 20 staff interviewed could not differentiate the difference between the three types of complaints.
Did the employees know who the Civil Rights Coordinator is?	X			
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?			X	3 of the 20 staff interviewed did not know the location of the poster for clients to get the information to file a discrimination complaint. Poster located in the lobby or reception area of facilities reviewed.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			
Is the County utilizing correct correspondence to address the final results to the complainant after the investigation is completed?	X			

Interview and review areas	Yes	No	Sometimes	Findings
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			
Is the County utilizing correct correspondence to address the final results to the complainant after the investigation is completed?	X			

B. Corrective Action

Element	Corrective Action
Discrimination Process	Fresno County 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	Fresno 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

Corrective Action: Department Policy and Procedure Guides (PPGs) for client complaints, discrimination complaints by clients, and discrimination complaints by employees were updated in April and May 2015 by DSS Personnel and the DSS Appeals Unit. All staff were notified of any revisions and required to verify PPGs were reviewed and understood.

IX. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups. There were no responses to our request from the county advocate groups.

X. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Fresno County Department of Social Services Civil Rights Compliance Plan for the period July 1, 2014 through June 30, 2015, was received on May 7, 2014. It is approved as submitted.

XI. CONCLUSION

The CDSS reviewer found the Fresno County Department of Social Services staff warm, welcoming, informative and very supportive. Particular thanks to Steve Sanchez, Civil Rights Coordinator, and Deborah Edell for organizing the details of the review, and assisting in each of the facility reviews. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The Fresno County Department of Social 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.



CDSS

JOHN A. WAGNER
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