



CDSS

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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

July 25, 2011

Jeffrey Brown, Director
Nevada County Human Services Agency
950 Maidu Avenue
P.O. Box 1210
Nevada City, CA 95959

Dear Mr. Brown:

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 April 26-28, 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 1, 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, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Leann Whitaker, Civil Rights Coordinator,

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
NEVADA COUNTY HUMANS SERVICES AGENCY
Conducted
APRIL 26-28, 2010**

**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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(916) 654-2107**

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 Nevada County Department of Social 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 on April 26-28, 2010. An exit interview was held on April 28, 2010 to review the 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)
Nevada County Health & Human Services Agency	715 Maltman Drive Grass Valley	Welfare To Work (WTW)	English
Nevada County Health & Human Services Agency	10075 Levon Avenue, Ste 207, Truckee	IHSS, NAFS and Children Services	English & Spanish
Nevada County Health & Human Services Agency	950 Maidu Ave Nevada City	CalWORKS, NAFS	English

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2009-2010 Annual Civil Rights 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.

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	5	2
Children Social Workers	1	1
Adult Social Workers	1	0
Receptionist/Screeners	2	1
Employment Workers	2	1
Total	11	5

Program Manager Surveys

Number of surveys distributed	6
Number of surveys received	6

Reviewed Case Files

English speakers' case files reviewed	25
Non-English or limited-English speakers' case files reviewed	43
Languages of clients' cases	Spanish, Farsi, Armenian, Vietnamese, Polish, Cantonese, Lao

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 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			Clients can mail in applications.
Does the county have extended hours to accommodate clients?	X			At the 715 Maltman Drive Office, office hours are 7:30 a.m.-6:00 p.m. Clients can request appointments on case by case basis.
Can applicants access services when they cannot go to the office?	X			Clients can access services by Teleconferencing, phone, website or by mail.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Through community partners, and satellite offices.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)? Is the pamphlet distributed and explained to each client at intake	X			The Pub 13 is distributed at initial contact and re-certification.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
and re-certification?				
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?	X			
Was the Pub 13 available in large print, audiocassette and Braille?		X		The Pub 13 was not available in Braille or audio format at the 1075 Levon Avenue, Truckee Office.
Were the current versions of the required posters present in the lobbies?		X		The Pub 475 "And Justice For All" was not displayed at 950 Maidu, Nevada City Office.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?		X		A couple of workers interviewed were not aware of the location of the required posters with the Civil Rights Coordinator's name and address.
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

Informational Element	Corrective Action Required
Auxiliary aids	Nevada County Department of Social 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

Informational Element	Corrective Action Required
Posters	Nevada County Department of Social 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

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 your program consultant 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.

A. Findings and Corrective Actions

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

Facility Location: 715 Maltman Drive, Grass Valley

Facility Element	Findings	Corrective Action
Main Entrance	<p>No International Symbol of Accessibility (ISA) signage on main entrance.</p> <p>No directional signage to accessible entrance.</p> <p>Force to open door is excessive at 10 lbs.</p>	<p>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</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201</p>
Client Interview Rooms	Interview rooms do not have minimum turning space.	Wheelchair Turning Space is a minimum space for a wheelchair to turn 180 degrees in a 60" diameter or T-shaped space. (CA T24 1118B.3, ADA 4.2.3) p 236
Unisex Restroom	No "ISA" signage on wall.	<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>

		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
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B. Recommendation

There are two interview rooms: Truckee River and Deer Creek. The Truckee River room could be made accessible by relocating furniture around.

Facility Location: 10075 Levon Avenue, Truckee

Facility Element	Findings	Corrective Action
Parking	No "Unauthorized Parking signage" at entrance from off street.	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
	Freestanding disabled parking sign(s) are below the height requirement (80"), at 73", 76", and 73".	Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.4.1, ADA 4.6.5) p 134

	<p>No "Minimum Fine \$250" signage below the ISA sign.</p> <p>Van access aisle is too narrow at 7 ½".</p> <p>Signage on pavement does not clearly depict a wheelchair.</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>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> <p>The surface of each accessible parking stall or space must have a surface identification duplicating either of the following schemes:</p> <ul style="list-style-type: none"> • By outlining or painting the stall or space in blue and outlining on the ground in the stall or space in white or suitable contrasting color a profile view depicting a wheelchair with occupant; OR • By outlining a profile view or a wheelchair with occupant in white on blue background. The profile view shall be located so that it is visible to a traffic enforcement officer when a vehicle is properly parked in the space and shall be 36" by 36".
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	<p>The words "No Parking" painted in access aisle are faded and not clearly visible.</p>	<p>Pavement signage shall be 36" x 36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.1 & 2) 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>
Main Entrance	No "ISA" signage 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	<p>Pub 86, EVERYONE IS DIFFERENT, BUT EQUAL UNDER THE LAW, poster did not have current Civil Rights Coordinator contact information.</p> <p>No Pub 13 in Braille or audio format found at reception desk in lobby.</p>	<p>Posters on nondiscrimination provided by CDSS shall be prominently displayed in all waiting rooms and reception areas. The county welfare department shall place on the posters the name, office telephone number, and office address of the person(s) in the CWD who is responsible for processing discrimination complaints. Posters dealing specifically with nondiscrimination in the Food Stamp Program shall be prominently posted in all certification and issuance offices. Div 21-107.211</p> <p>Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs"</p>

		shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (e.g., cassette tapes, large print, etc.). Div 21-107.221
Client Interview Room	Tables too low at 24".	Minimum seating knee space is 27" high, 30" wide and 19" deep. (CA T24 1122B.3, ADA 4.32.3) p 388
Men's Restroom	1 st Floor restroom door pressure is excessive at 9 lbs.	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
Women's' Restroom	2 nd Floor restroom, pipes under sink need to be rewrapped. Sanitary napkin dispenser is too high over 40".	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 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

C. Facility Location: 950 Maidu, Nevada City

Facility Element	Findings	Corrective Action
Parking	<p>No "Unauthorized Parking signage" at entrance from off street.</p> <p>No directional signage to main entrance of Social Services.</p> <p>No "Minimum Fine \$250" signage below the ISA sign</p> <p>Accessible space does not meet minimum measurement requirements. Length of</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>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</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>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p 135</p>

	spaces is too short at 16' and 17'. The words "No Parking" painted in access aisle are faded and not visible.	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) 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
Main Entrance	No "ISA" signage 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 Interview Room	Space in interview room is too small and does not allow for turning space.	Wheelchair Turning Space is a minimum space for a wheelchair to turn 180 degrees in a 60" diameter or T-shaped space. (CA T24 1118B.3, ADA 4.2.3) p 236
Water fountain	Does not have minimum knee space of 27" from floor.	The clear knee space between the bottom of the apron and the floor or ground not less than 27" in height, 30" in width, and 8" in depth. (CA T24 1117B.1.2, ADA 4.15.5(1)) p 231
Public Telephone	No clear floor space in front of the telephone.	Minimum clear floor space 30" x 48" to allow forward or parallel approach. (CA T24 1117B.2.2, ADA 4.31.2) p 271

Men's Restroom	<p>Door sign is too high at 66".</p> <p>Force to open doors is excessive at 10 lbs.</p> <p>Soap dispenser is too high at 42".</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>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>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	Door sign is too high at 65 1/2".	<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>Force to open door is excessive at 10 lbs.</p> <p>Soap dispenser is too high at 43".</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>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>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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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			On application SAWS1, and Gen-70.
Does the county use a primary language form?			X	County Form 29-Gen-70 was not found in all sample cases reviewed.
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			Client would be assigned to Spanish Bilingual worker. County also utilizes Language 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	X			

Question	Yes	No	Some-times	Comments
process?				
Are county interpreters determined to be competent?	X			Bilingual workers are certified through testing process with Merit Systems Services.
Does the county have adequate interpreter services?	X			
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			
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			The department can elect to supply a second interpreter to ensure accurate communications when a client prefers to use their own 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	X			

Question	Yes	No	Some-times	Comments
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			Staff interviewed state they read to the client and explain all forms to ensure they understand.
Does the county offer screening for learning disabilities?	X			
Is there an established process for offering screening?	X			
Is the client identified as having a learning disability referred for evaluation?	X			Clients would be referred to Sierra College.

C. Recommendation

It would be recommended to have refresher training on utilizing the County Form 29-Gen-70 Language Preference Form in all programs.

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-Assisted Food Stamps
Ethnic origin documentation	ER Referral		SAWS1, Gain Appraisal Form	SAWS1, Gain Appraisal Form
Primary language documentation	ER Referral form if known	IHSS Assessment	SAWS1, GEN-70	SAWS1, GEN-70
Method of providing bilingual services and documentation	Bilingual worker, Case notes	Case Narrative	Case Narrative	Case Narrative
Client provided own interpreter	None found in case sample.	Case narrative	None found in case sample.	None found in case sample.
Method to inform client of potential problem using own interpreter	None found in case sample.	In some cases Gen-70 was not found nor was it noted in case narrative.	None found in case sample.	None found in case sample.
Release of information to Interpreter	None found in case sample.	In some cases Gen-70 was not found nor was it noted in case narrative.	None found in case sample.	None found in case sample.
Individual's acceptance or refusal of written material offered in primary language	None found in case sample.	In some cases Gen-70 was not found nor was it noted in case narrative.	None found in case sample.	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.
Documentation of circumstances for using minor interpreter temporarily	None found in case sample.	None found in case sample.	None found in case sample.	None found in case sample.

Documented Item	Children's Services	IHSS	CalWORKs	Non-Assisted Food Stamps
Translated notice of actions (NOA) contain translated inserts	None found in case sample.	None found in case sample.	ISAWS	ISAWS
Method of identifying client's disability	None found in case sample.	Case narrative	WTW Self Appraisal 522, SOF	SOF
Method of documenting a client's request for auxiliary aids and services	None found in case sample.	Case narrative	None found in case sample.	None found in case sample.

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
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
Documentation of primary language	Each agency shall ensure that case record identification shows the applicant's/recipient's ethnic origin and primary language. Div. 21-201.21
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter.

Areas of Action	Corrective Action
	Div. 21-116.22
General	Nevada County Department of Social Services must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

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			
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		New CSW had not received training on MEPA.
Do the employees seem knowledgeable about the				

predominant cultural groups receiving services in their area?	X			
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B. Corrective Actions

Training Area	Corrective Action
MEPA Training for Children's Social Workers	Nevada County Department of Social Services 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			
Did the employees know who the Civil Rights Coordinator is?			X	There were a couple of new employees who were not aware of whom the Civil Rights Coordinator was.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?			X	There were a few staff interviewed that did not know the location of the Civil Rights poster.

Interview and review areas	Yes	No	Some-times	Findings
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	Nevada County Department of Social Services 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

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Nevada County Department of Social Services Civil Rights Compliance Plan for the period 2009-2010, was received on May 4, 2009. It is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the Nevada County Department of Social Services staff warm, welcoming, informative and very supportive. Particular thanks to Cynthia Bryan, 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 Nevada County Department of Social Services in substantial 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 Nevada 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.