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**DEPARTMENT OF SOCIAL SERVICES**  
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ARNOLD SCHWARZENEGGER  
GOVERNOR

June 29, 2010

Kathryn Flores, Director  
San Benito County Health and Human Services Agency  
1111 San Felipe Road, #206  
Hollister, CA 95023

Dear Ms. Flores:

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 May 5-6, 2010. Enclosed is the final report on the review.

There are some compliance 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 timelines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. Per the Governor's Executive Order S-08-09, all compliance reviews (and corresponding CAPs) performed after January 2008 will be posted on the state's Reporting Government Transparency website.

If you need technical assistance in the development of your CAP, please feel free to contact the Civil Rights Bureau at (916) 654-2107. You may also contact us by e-mail at [crb@dss.ca.gov](mailto:crb@dss.ca.gov).

Sincerely,

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

Enclosure

c: Nadine DaRoza, Civil Rights Coordinator

Chris Webb-Curtis, Branch Chief, CDSS Supplemental Nutrition Assistance Program,  
M.S. 8-9-32

Mike Papin, CDSS Supplemental Nutrition Assistance Program  
Food Stamps Policy Bureau, M.S. 8-9-32

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT**  
**FOR**  
**SAN BENITO COUNTY HEALTH AND HUMAN SERVICES AGENCY**  
**Conducted**  
**May 5-6, 2010**

**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**

**Claudia Cabrera**

## TABLE OF CONTENTS

- I. INTRODUCTION
- II. SUMMARY OF METHODOLOGY
- III. DISSEMINATION OF INFORMATION
- IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES
- V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES
- VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS
- VII. STAFF DEVELOPMENT AND TRAINING
- VIII. DISCRIMINATION COMPLAINT PROCEDURES
- IX. CIVIL RIGHTS COMPLIANCE PLAN
- X. CONCLUSION

## 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 San Benito Human Services Agency 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 May 5-6, 2010. An exit interview was held on May 6, 2010 with the following staff to review the findings.

<b>NAME</b>	<b>TITLE</b>
Kathy Flores	Director HHSA
Nadine DaRoza	Civil Rights Coordinator
Alma Villasana	Eligibility Supervisor
Pat Estrada	CalWORKs Supervisor
Antoinette Moreno	Office Services Supervisor
Tracey Belton	Social Work Supervisor-CPS
Enrique Arreola	Deputy Director

The review was conducted in the following locations:

<b>Name of Facility</b>	<b>Address</b>	<b>Programs</b>	<b>Non-English languages spoken by a substantial number of clients (5% or more)</b>
San Benito HHSA	1111 San Felipe Rd Hollister, CA	NAFS, CalWORKs, IHSS, Children's Services	Spanish

### II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2010 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.

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

<b>Classifications</b>	<b>Total</b>	<b>Bilingual</b>
Eligibility Workers	4	4
Children Social Workers	2	2
IHSS Workers	2	2
Receptionist/Screeners	1	1
<b>Total</b>	<b>9</b>	<b>9</b>

#### Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

#### Reviewed Case Files

English speakers' case files reviewed	12
Non-English or limited-English speakers' case files reviewed	18
Languages of clients' cases	English, Spanish, Punjabi, Somalia

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 includes augmentations to the County's Civil Rights Compliance Plan that should be submitted with the corrective action plan.

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

<b>Access to Services, Information and Outreach</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X		Applications can be mailed in or clients can obtain an application online and e-file the application.
Does the county have extended hours to accommodate clients?		X	The county does not have extended office hours. Normal office hours are M-F, 8-5.
Can applicants access services when they cannot go to the office?	X		Clients can access services over-the-telephone or through the county website.
Does the county ensure the awareness of available services for individuals in remote areas?	X		Outreach workers attend Health Foundations to pass out fliers, the Community Pantry has workers go out to rural parts of the county to distribute FS applications, and San Juan Bautista has fliers available at their school.

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)?	X		PUB 13 is given to clients during intake, annual renewal/re-certification.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X		
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong,	X		

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?			
Was the Pub 13 available in large print, audiocassette and Braille?	X		
Were the current versions of the required posters present in the lobbies?	X		
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?		X	Two out of nine staff interviewed did not know where the required poster with the Civil Rights Coordinator information was located.
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	Both entrances into the building did not have directional signs indicating the location of the HHSA offices.

### **B. Corrective Actions**

<b>Informational Element</b>	<b>Corrective Action Required</b>
Posters	San Benito HHSA 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	San Benito HHSA 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 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](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:** 1111 San Felipe Road, Hollister

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Parking: San Felipe Road Entrance	The off-street entrance from San Felipe Road did not have the required "unauthorized parking" sign at entrance to accessible parking.	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

	<p>There are no van accessible spaces.</p> <p>Signage on pavement depicting a wheelchair with occupant needs to be re-painted.</p>	<p>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>Accessible parking spaces shall be located as near as practical to a primary entrance and shall have required spaces according to table. (CA T24 1129B.1, ADA 4.1.2(5)(a)) p 134</p> <p>One in every 8 <i>accessible</i> spaces (no fewer than 1) shall be designated van accessible. (CA T24 1129B.3.2, ADA 4.1.2(5)(b)) p 136</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>Pavement signage shall be 36" x 36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.2) p 134</p>
<p>Parking: Community Drive Entrance</p>	<p>The off-street entrance from Community Drive did not have the required "unauthorized parking" sign at entrance to accessible parking.</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</p>

	<p>The van-accessible space is short at 7'8".</p> <p>The words "NO PARKING" were not painted in access aisles.</p>	<p>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>Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.3.1, ADA 4.6.3) p 135</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	<p><b>CaIWORKs/NAFS</b></p> <p>There is no accessible signage to main entrance.</p> <p>There is no ISA (International Symbol of Accessibility) sign posted at main entrance.</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>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><b>Children's Services/IHSS</b> There is no accessible signage to main entrance.</p> <p>There is no ISA (International Symbol of Accessibility) sign posted at main entrance.</p>	<p>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</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>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>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</p>
<p>Client lobby</p>	<p><b>Children's Services/IHSS</b> Door pressure is excessive at 8 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) &amp; (b)) p 201</p>

Restroom	Men's: Sign on door is low at 55".	Door sign and wall sign shall be 60" above the floor.  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
	Door pressure is excessive at 8 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
	Pipes under sink need to be re-wrapped.	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
	Women's: Sign on door is low at 55".	Door sign and wall sign shall be 60" above the floor.  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
	Door pressure is excessive at 10 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
	Pipes under sink need to be re-wrapped.	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

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**B. 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	Comments
Does the county identify a client's language need upon first contact? How?	X		Clients fill out Primary Language Form.
Does the county use a primary language form?	X		The Primary Language Form is color coded in pink.
Does the client self-declare on this form?	X		Clients fill out form.
Are non-English- or limited- English-speaking	X		Non-English-speaking or limited-English-speaking clients are assigned to a bilingual

Question	Yes	No	Comments
clients provided bilingual services?			worker, if available.
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		Non-English-speaking or limited-English-speaking clients are assigned to a bilingual worker, if available. If no bilingual workers available in client's primary language, bilingual services will be provided through Tele Interpreters.
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		The County contracts with Tele Interpreters OPI Services.
Are county interpreters determined to be competent?	X		
Does the county have adequate interpreter services?	X		
Does the county allow minors to be interpreters? If so, under what circumstances?	X		Minors are only allowed to be used as interpreters under extenuating circumstances and for purposes of relaying information to clients regarding rescheduling an appointment.
Does the county allow the client to provide his or her own interpreter?	X		Client-provided interpreters must be over the age of 18.
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		Staff are aware of the availability and how to access CDSS-translated forms from the state website.
Is the information that is to be inserted into NOA translated into the client's primary language?	X		All NOA insertions are translated into the client's primary language.
Does the county provide auxiliary aids and	X		Staff can provide a magnifying glass for someone who has partial vision impairment.

Question	Yes	No	Comments
services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?			
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X		Staff will read out loud to someone who cannot read and will assist clients who cannot write by filling out their forms. This will be noted in C-IV case comments.
Does the county offer screening for learning disabilities?	X		If clients wish to be assessed for a learning disability they are offered a "Learning Disability Form" WTW17.
Is there an established process for offering screening?	X		After the WTW17 form has been completed and answers assessed, clients will then be referred for further evaluation.
Is the client identified as having a learning disability referred for evaluation?	X		Clients are referred to Hope Rehabilitation at the Gavilan College in Gilroy. Once it has been determined what learning disabilities a clients has, they are placed in classes that help them learn a trade or vocation.

## 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-Assisted Food Stamps
Ethnic origin documentation	Emergency Response Referral	"Demo and Appropriate Services Related Client Info" SBC Form, SOC 295	C-IV Individual Demo page	Passport to Services Form, C-IV ID page, SAWS I
Primary language documentation	Face Sheet	SBC Form, SOC 295	C-IV Case Summary	Passport to Services Form, C-IV ID page, SAWS I
Method of providing bilingual services and documentation	CWS-CMS	SBC Form, SOC 295, Case Narrative	C-IV Journal Entry	None found in cases reviewed
Client provided own interpreter	None found in cases reviewed	SBC Form, Case Narrative	None found in cases reviewed	None found in cases reviewed
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 cases reviewed
Release of information to Interpreter	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed
Individual's acceptance or refusal of written material offered in primary language	None found in cases reviewed	SBC Form	None found in cases reviewed	None found in cases reviewed
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	CWS-CMS	Case file	C-IV Correspondence Tab	C-IV Correspondence

Documented Item	Children's Services	IHSS	CalWORKs	Non-Assisted Food Stamps
Method of identifying client's disability	Emergency Response Referral	Intake/Annual Renewal Form, SOC 293A	C-IV Medical Condition Tab, SOF	C-IV Medical Condition Tab, SOF
Method of documenting a client's request for auxiliary aids and services	Emergency Response Referral	Intake/Annual Renewal Form, SOC 293A	C-IV Medical Condition Tab, SOF	C-IV Medical Condition Tab, SOF

## 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

## C. Note

It was noted in some of the cases reviewed that client-provided interpreters were used but there was no documentation that the interpreters signed a confidentiality statement or that the clients were informed of potential problems using their own interpreters. Both of these items must be done when a client wishes to provide their own interpreter, and be so documented in the case file.

## 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	Comments
Do employees receive continued Division 21 Training?	X		Division 21 training is provided annually.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?		X	Four out of nine staff interviewed did not know what to do when a client voices a discrimination complaint.
Does the county provide employees Cultural Awareness Training?	X		Cultural Awareness training is provided during the DIV 21 training.
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	It was noted by a few of the staff interviewed that services to the Oaxacan population have been increasing.

## B. Corrective Actions

Training Area	Corrective Action
Division 21, Civil Rights Training	San Benito HHSA shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1
Cultural Awareness Training	San Benito HHSA shall ensure that all public contact employees receive cultural awareness training to ensure that public contact staff has an understanding of and sensitivity to the various cultural groups in the county's population. Div. 21-117.2

## 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**

<b>Interview and review areas</b>	<b>Yes</b>	<b>No</b>	<b>Findings</b>
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?		X	Four out of nine staff interviewed could not identify the difference between a program and discrimination complaint.
Did the employees know who the Civil Rights Coordinator is?		X	Two out of nine staff interviewed did not know who the CRC was.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?		X	Two out of nine staff interviewed were not aware of the location of the Civil Rights poster.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X		

**B. Corrective Action**

<b>Element</b>	<b>Corrective Action</b>
Discrimination Process	San Benito HHSA 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	San Benito HHSA 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**

Thank you for submitting your agency's Civil Rights Compliance Plan for 2010. It is approved as submitted.

**X. CONCLUSION**

The CDSS found the San Benito County Health and Human Services Agency 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.

San Benito Health and Human Services Agency must remedy the violations 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 by which all actions will be taken to correct the violations.

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.