



CDSS

WILL LIGHTBOURNE  
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**

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EDMUND G. BROWN JR.  
GOVERNOR

June 8, 2012

Christine Applegate, Director  
Stanislaus County Community Services Agency  
P.O. Box 42  
Modesto, CA 95397-5351

Dear Ms. Applegate:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office, Daniel Cervantes, during the course of the Civil Rights Compliance Review of Stanislaus County. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 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. In addition, they are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>

If you need technical assistance in the development of your CAP, please feel free to contact 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, Chief  
Civil Rights Bureau  
Human Rights and Community Services Division

Enclosure

c: William Ryan, Civil Rights Coordinator

Linda Patterson, Branch Chief  
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Mike Papin, Chief  
CalFresh Policy Bureau

Marlene Fleming, Chief  
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Brian Tam, Chief  
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR  
STANISLAUS COUNTY COMMUNITY SERVICES AGENCY  
Conducted March 2012**

**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**

**Daniel Cervantes**

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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 Stanislaus County Community 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 in March 2012. An exit interview was held on March 29, 2012, to review the preliminary findings.

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>
Main Office	251 E. Hackett Road, Modesto, CA	Adult Programs NASF W2W StanWORKs Children's Services	Spanish
Hughson	2413 3 <sup>rd</sup> Street Hughson, CA	StanWORKs	Spanish
West Side Service Center	66 N El Circulo Patterson, CA	StanWORKs Intake Applications WTW Case Management	Spanish

### II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2010-11 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

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

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

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

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

Interviews Conducted of Public Contact Staff

<b>Classifications</b>	<b>Total</b>	<b>Bilingual</b>
Eligibility Workers	6	4
Children Social Workers	5	4
Adult Program Workers	3	2
Receptionist/Screeners	4	4
<b>Total</b>	<b>18</b>	<b>14</b>

An additional 2 interviews were scheduled but were not conducted due to staff unavailability.

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	6
Non-English or limited-English speakers' case files reviewed	64
Languages of clients' cases	English, Spanish, Assyrian, Farsi, Vietnamese, Tagalog

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section X of the report is reserved for a declaration of overall compliance.

### III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

#### A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Applications can be submitted online, can be mailed in, or at one of the various outstations throughout the county. Clients are also encouraged to use C4Yourself.
Does the county have extended hours to accommodate clients?		X		Extended hours were eliminated prior to the last review due to budget concerns.
Can applicants access services when they cannot go to the office?	X			Applicants can use the internet to apply for services.
Does the county ensure the awareness of available services for individuals in remote areas?	X			The county does an exceptional job in ensuring potential

				applicants are aware of their services. They communicate with individuals throughout the county via the internet, community outreach, various hospitals/clinics, and outstations.
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<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
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			Of the 14 county workers interviewed (not reception staff) over the phone, all provided consistent answers about when they provide the PUB 13 and how they explain it.
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			All of the facilities visited had the most current versions of the PUB 13 in the required (English and Spanish) languages.
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		Although first contact staff had knowledge of the PUB in the various languages and knew how to retrieve them, there were no signs indicating that the PUB 13 was available in 18 languages.
Was the Pub 13 available in large	X			

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
print (English and Spanish), audiocassette and Braille?				
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			All of the employees interviewed knew there was a poster in the lobby. But, 2 of those employees interviewed did not know the poster contained the CRC's information.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			At the main office on Hackett, there was an informational sign at the building's main entrance that was in English only. The signed pointed the direction of Adult Social Services and Children's Services.

## B. Corrective Actions

<b>Informational Element</b>	<b>Corrective Action Required</b>
Translated Pub 13	Stanislaus County shall ensure that the current version of the Pub 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language. Div. 21-115.2 Further, Stanislaus County CSA must provide inform the public that the PUB 13 is available upon request in all 18 languages.

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

### C. Recommendation

The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	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.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.

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

## A. Findings and Corrective Actions

**Facility Location:** 251 E. Hackett, Modesto, CA

Facility Element	Findings	Corrective Action
Parking	<p>Accessible spaces do not have additional signage below top sign indicating a minimum fine of \$250.</p> <p>2 of the front 14 handicap accessible spaces do not have access aisles.</p> <p>Access aisles do not have the words NO PARKING.</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 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>

	Accessible parking in the 2 <sup>nd</sup> row of parking spots not ADA compliant. <b>Please see note below.</b> **	PLEASE SEE NOTE BELOW.**
Outside signage	Lobby to the secondary entrance does not have international symbol of accessibility.	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
Woman's Restroom:	Restroom sign not ADA compliant.	<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>

## B. Note

\*\*At this CSA location, there are a total of 29 spaces; 14 directly facing the building and 15 spaces designated as ADA spaces just behind the first 14. Of the first 14 spaces, 2 spaces designated as van accessible spaces do not have adequate access aisles.

The 15 spaces opposite the first 14 have ADA signage, but are not ADA compliant. None

of the spaces have access aisles. Should Stanislaus County CSA wish to designate these 15 spaces handicap accessible, the spaces need to meet the minimum ADA parking space standards. Alternatively, CSA has the option of removing the ADA signage as the front 14 spaces satisfy the minimum ADA requirements for accessible spaces.

**C. Facility Location:** 2413 3<sup>rd</sup> Street, Hughson, CA

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Exterior entrance	Door pressure at building's entrance excessive at 12 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 207  Force to open fire door, minimum allowable not to exceed 15 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(1)) p 207
Client lobby	No accessible counter in building's lobby. Counter too high at 42 in.	Height of accessible tables or counters is between 28" – 34" from floor finish. (CA T24 1122B.4, ADA 4.32.4) p 388
Men's and Woman's Restroom:	Door pressure excessive at 11 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 207  Force to open fire door, minimum allowable not to exceed 15 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(1)) p 207

**D. Facility Location:** 66 N. El Circulo, Patterson, CA

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Parking	Accessible spaces do not have additional signage below symbol indicating a minimum fine of \$250.	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

	<p>Accessible space not designated as van accessible.</p> <p>Access aisle does not connect to an accessible path of travel to ADA accessible entrance.</p>	<p>T24 1129B.4.1) p 133</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>Access aisles (load and unload) must connect to the accessible path of travel, including curb cuts or ramps as needed. (CA T24 1129B.3.3, ADA 4.6.3) p 135</p> <p>Walkways minimum 48". (CA T24 1133B.7.1) p 160</p>
Exterior entrance	<p>Ramp slope too steep at 17.3%.** <b>Please see note in section E.</b></p> <p>Door pressure excessive at 13 lbs.</p>	<p>Slope of curb ramp does not exceed 1:12 (8.3% slope). (CA T24 1127B.5.3, ADA 4.8.2) p 155</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 207</p> <p>Force to open fire door, minimum allowable not to exceed 15 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(1)) p 207</p>
Outside signage	<p>No ISA signage designating building as accessible.</p> <p>No directional signage to accessible 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>
Client lobby	<p>No accessible counter in building's lobby. Counter</p>	<p>Height of accessible tables or counters is between 28" – 34"</p>

	too high at 40 in.	from floor finish. (CA T24 1122B.4, ADA 4.32.4) p 388
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#### E. Note

\*\*The accessible parking space is located at the back of the parking lot. Upon entering the parking lot, it was difficult for this reviewer to see the small sign directing person's with disabilities to contact the receptionist at the poster phone number for assistance. It should also be noted that person's without a cell phone would not be able to communicate their need for assistance.

The door of the wheelchair entrance at the back of the building went unanswered 3 separate times when this reviewer knocked. Further, the slope of the ramp is over 2 times steeper than the acceptable slope for wheelchair access.

#### 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	Sometimes	Comments
Does the county identify a client's language need upon first contact? How?	X			Reception staff use I SPEAK cards to help identify the client's primary language. When applying for benefits, clients self designate their language/ethnicity.
Does the county use a primary language form?		X		
Does the client self-declare on this form?		X		N/A
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			Stanislaus County employees many Spanish speaking workers. They also have employees that speak Assyrian and Farsi to accommodate the large number of Assyrian/Farsi speaking applicants.
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			A list of county certified interpreters is available through the human resources department. The County also provides a language line for translative services.
Are county interpreters determined to be competent?	X			Interpreters must be certified and receiving bilingual pay to provide this county service.
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		Under no circumstance does the county practice the use of minors as interpreters.
Does the county allow the client to provide his or her own interpreter?	X			Stanislaus County CSA does allow for a client to provide their own interpreter, but <u>they do not require them to sign a release of information.</u>
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?				See comments above.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			
Is the information that is to be inserted into NOA translated into the client's primary language?	X			
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			Auxiliary aids available upon request.
Does the county identify and assist the client who has learning disabilities	X			If a client cannot read/write, the county workers assist them and ensure the client understand all

Question	Yes	No	Some-times	Comments
or a client who cannot read or write?				of the information provided.
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			

#### B. Corrective Actions

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. Division 21-116.24

#### VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

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

#### A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	CWS-CMS	Stan 261-D, Soc 295	C-IV journal, SAWS-1	C-IV journal, SAWS-1
Primary language documentation	CWS-CMS	Stan 261-D, Soc 295	C-IV journal, SAWS-1	C-IV journal, SAWS-1

<b>Documented Item</b>	<b>Children's Services</b>	<b>Adult Programs (IHSS &amp; APS)</b>	<b>CalWORKs &amp; Employment Services</b>	<b>Non-Assistance CalFresh</b>
Method of providing bilingual services and documentation	CWS-CMS	Stan 261-D, Soc 295	C-IV journal	C-IV journal
Client provided own interpreter	None found	None found	C-IV journal	C-IV journal
Method to inform client of potential problem using own interpreter	None found	None found	None found	None found
Release of information to Interpreter	None found	None found	None found	None found
Individual's acceptance or refusal of written material offered in primary language	None found	None found	None found	None found
Documentation of minor used as interpreter	Minors are not used	Minors are not used	Minors are not used	Minors are not used
Documentation of circumstances for using minor interpreter temporarily	N/A	N/A	N/A	N/A
Translated notice of actions (NOA) contain translated inserts	N/A	NOAs are sent out in the appropriate language	NOAs are sent out in the appropriate language	NOAs are sent out in the appropriate language
Method of identifying client's disability	CWS-CMS	Case notes	C-IV journal	C-IV journal

Documented Item	Children's Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Method of documenting a client's request for auxiliary aids and services	CWS-CMS	Case notes	C-IV journal	C-IV journal

## B. Corrective Actions

Areas of Action	Corrective Action
Documentation if client provided own interpreter  <b>*Repeat Finding from 2009</b>	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 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. Div. 21-116.22 ACL 08-65
General  <b>*Repeat Finding from 2009</b>	Stanislaus County CSA must ensure that proper documentation is kept in the file that identifies all the required elements. Although many of the cases reviewed had sufficient documentation, there were a few cases that failed to document at critical contacts.

## 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			Since the last review, staff regularly receives training. They even receive a quarterly newsletter that provides county employees new/critical information with the latest in civil rights.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			All county staff knew both Ms. Linda Burrows and Mr. William Ryan and where to direct discrimination complaints.
Does the county provide employees Cultural Awareness Training?	X			Training occurs annually with quarterly refreshers in the form of a news letter.
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

## 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			
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			All employees knew about the poster in the lobby. The poster contains Ms. Linda Burrows' contact information, but the county Civil Rights Coordinator is listed as Mr. William Ryan.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

#### B. Corrective Actions

The PUB 86 Poster, Everyone is Different, but Equal under the Law, must be displayed in its most current version (03/07) in every county lobby. Further, the most current contact information of the county's Civil Rights Coordinator must be displayed at the top of each poster. All posters should display the same information.

#### IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Stanislaus County Community Services Agency Civil Rights Compliance Plan for the period February 1, 2010 through January 1, 2011 is approved as submitted.

## X. CONCLUSION

The CDSS reviewer found the Stanislaus County Community Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Mr. Bill Ryan, Civil Rights Coordinator and Ms. Linda Burrows, Civil Rights Investigator, for organizing the details of the review. In each District Office, staff was very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Stanislaus County Community Services Agency 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 Stanislaus County Community Services Agency 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.