



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



EDMUND G. BROWN JR.
GOVERNOR

July 30, 2013

Mr. Joseph Chelli, Director
San Joaquin County Human Services Agency
102 San Joaquin Street
P. O. Box 201056
Stockton, CA 95201-3006

Dear Mr. Chelli:

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

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

We will provide a copy of our report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>

If you need technical assistance in the development of your CAP, please feel free to contact Mr. Cervantes at (916) 654-0946. You may also contact him by e-mail at Daniel.Cervantes@dss.ca.gov.

Sincerely,

Original signed by Civil Rights Bureau Chief

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

Enclosure

c: Melissa Sangalang, Civil Rights Coordinator

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Marlene Fleming, Chief
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
SAN JOAQUIN COUNTY
HUMAN SERVICES AGENCY**

**Conducted on
May 20-24, 2013**

**California Department of Social Services
Human Rights and Community Services Division**

**Civil Rights Bureau
744 P Street, M.S. 8-16-70
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Reviewer

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 San Joaquin County 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 20-24, 2013. An exit interview was held to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
San Joaquin Human Services Agency	102 S. San Joaquin St. Stockton, CA 95202	All Programs	Spanish
CalWORKS Employment Center	900 E. Oak St., 2 nd Floor Stockton, CA 95202	CalWORKs	Spanish
Tracy Family Planning	730 N. Central Tracy, CA 95206 (Part-time space)	NAFS	Spanish
Channel Medical Group	701 E. Channel Stockton, CA 95202	NAFS	Spanish

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2012-13 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.

- Contacted Jodie Berger or Legal Services of Northern California. She directed me to Kirk Ah-Tye and Sujatha Branch. E mails to Mr. Ah-Tye and Ms. Branch went unanswered.

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	7	5
Children Social Workers	3	1
Adult Program Workers	3	1
Receptionist/Screeners	4	3
Employment Training Specialist	3	2
Total	20	12

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	3

Reviewed Case Files

English speakers' case files reviewed	12
Non-English or limited-English speakers' case files reviewed	55
Languages of clients' cases	English, Spanish, Korean, Hmong, Cambodian, Russian, Farsi

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			Workers accommodate client's need on a case to case basis. Clients are allowed to fill out Food Stamp applications online.
Does the county have extended hours to accommodate clients?	X			Workers are able to adjust their hours of service on a case to case basis.

Can applicants access services when they cannot go to the office?	X			See comments above.
Does the county ensure the awareness of available services for individuals in remote areas?	X			San Joaquin HSA has remote offices in Tracy and French Camp that allow clients access to services. Further, the county also provides brochures, pamphlets, and posters at a variety of events/locations within the county. Information is also available from the San Joaquin County HSA website.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)?	X			The lobbies visited all had the PUB 13 pamphlet in various languages displayed. Further, all receptionists were able to produce the PUB 13 in Braille, large print, and audio.
Is the pamphlet distributed and explained to each client at intake and recertification?	X			Each county worker interviewed stated that they knew the importance of the PUB 13 and distributed at intake and recertification.
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 lobbies visited had various languages of the PUB 13 displayed for the public.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?				N/A
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	X			All receptionists were able to produce the PUB 13 in Braille, large print, and audio.
Were the current versions of the required posters present in the lobbies?		X		The And Justice For all (#475B) was not posted in any office. All office had current versions of the PUB 86.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?			X	When county workers were interviewed over the phone, they were well aware of the PUB 86 poster and that it displayed the CRC's information. While visiting San Joaquin County, only one of the receptionists knew the location of the poster and that the CRC's information was posted for the public to view.
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			In many locations, San Joaquin HSA offers this information in a third language in addition to the required English and Spanish.

B. Corrective Actions

Informational Element	Corrective Action Required
Posters	San Joaquin County 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 All county staff should be aware of the location of the Civil Rights Coordinator's information on the PUB 86 poster.

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

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

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

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

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

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

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

A. Findings and Corrective Actions

1. Facility Location: 102 S. San Joaquin St. Stockton, CA 95202

Facility Element	Findings	Corrective Action
Parking	<p>Parking is located across the street from the facility under the freeway</p> <p>The words NO PARKING are either missing or no longer visible in the access aisles.</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.3.1) p 136</p>
Exterior entrance	<p>No ISA sign designating building wheelchair accessible.</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 403</p>
Restroom (Men's and Women's)	<p>Door pressure excessive: Men's at 8 lbs. Woman's at 9lbs.</p>	<p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201</p>

2. Facility Location: 900 E. Oak Street, 2nd Floor, Stockton, CA 95202

Facility Element	Findings	Corrective Action
Parking	No additional signage or additional language below the symbol of accessibility "Minimum Fine \$250."	An additional sign or additional language below the symbol sign of accessibility shall state "Minimum Fine \$250" (CA T24 1129B.4) p 134
Exterior entrance	No ISA sign designating building accessible.	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 403
Restroom (Men's) 2 nd floor	Door pressure excessive at 12 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207
Restroom (Woman's) 2 nd floor	Door pressure excessive at 12 lbs. Toilet protector too high at 46 inches.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207 If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.1.1) (ADA 4.19.6) p 296, 299, 304
Restroom (3 rd floor)	Door pressure excessive: Men's at 9 lbs. Woman's at 11 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207

3. Facility Location: 701 E. Channel, Stockton, CA 95202

Facility Element	Findings	Corrective Action
Parking	No additional signage or additional language below the symbol of accessibility "Minimum Fine \$250."	An additional sign or additional language below the symbol sign of accessibility shall state "Minimum Fine \$250" (CA T24 1129B.4) p 134

a. Comments

This is a part time space used by San Joaquin HSA. Upon arrival, reviewer spoke with Ms. Christina Martinez, SJHSA employee that uses an office in this location to assist in Food Stamps and CalWORKs when clients are applying for Medi-Cal. Ms. Martinez was informed of the importance of the PUB 13, the required Civil Rights posters, and the right to free interpretive services that all clients should be made aware of. Ms. Martinez was very receptive of this information. Ms. Martinez also works in the Tracy Family Planning in the same capacity.

4. Facility Location: 730 N. Central, Tracy, CA 95202

Facility Element	Findings	Corrective Action
Exterior entrance	No ISA sign designating building accessible.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction where the accessible route of travel diverges from the regular circulation path along or leading to an accessible route of travel, entrance or facility. (CA T24 1127B.3) p 191 The International Symbol of Accessibility shall be the standard used to identify facilities that are accessible to and usable by physically disabled persons as set forth in these building standards and as specifically required in this section.

	<p>Door pressure to enter building excessive at 13 lbs.</p> <p>Bottom 10 inches of door is glass which can possibly shatter if attempted to be opened by a wheelchair footrest.</p>	<p>(CA T 24 117B.5.8.1) (ADA 4.1.2(7)) p 400</p> <p>Signs shall indicate the direction to accessible building entrances and facilities, (CA T24 1117B.3) p 191, 400</p> <p>The maximum force required to push or pull open a door shall comply with the following:</p> <p>Exterior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(A)) p 207</p> <p>Interior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)) (B)) p 207</p> <p>Fire Door: Min. allowable by administrative authority, not to exceed 15 pounds of force max. (CA T24 1133B.2.5) (ADA 4.13.11(1)) p 207</p> <p>The bottom 10" of all doors (except automatic and sliding) shall have a smooth, uninterrupted surface to allow the door to be opened by a wheelchair footrest without creating a trap or hazardous condition. (CA T24 1133B.2.6) p 209</p>
Restroom (Unisex)	No signage on door designating restroom wheelchair accessible.	Unisex sanitary facilities shall be identified by a circle ¼" thick, and 12" in diameter with a ¼" thick triangle superimposed on the circle within the 12" diameter. (CA T24 1115B.6.3) p 286 .

a. Comments

See comments above.

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			The county has trained first contact staff/receptionist to identify language needs. If needed, the I SPEAK card is used to help identify a client's language. Further, many of the receptionists at the main HSA

Question	Yes	No	Some-times	Comments
				building are Spanish speaking. This helps provide in providing immediate service to the large Spanish speaking population.
Does the county use a primary language form?	X			Form SJ100
Does the client self-declare on this form?	X			Client selects their preferred written and spoken language, then signs and dates on the back of the form.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Spanish speakers are normally assigned a Spanish speaking worker. Other languages are offered county certified interpreters in their preferred language as needed.
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			The workers interviewed had knowledge of how to request interpretive services if they could not communicate effectively with the client. San Joaquin County has many bilingual workers that serves the majority of the population. Also, San Joaquin HSA has a contract with Certified Languages International to provide translation services over the phone.
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			See comments above.
Are county interpreters determined to be competent?	X			Bilingual workers must be certified through the county.

Question	Yes	No	Some-times	Comments
Does the county have adequate interpreter services?	X			In most situations, San Joaquin County can provide the interpretive service in house.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		None of the workers interviewed stated that they allow minors to interpret.
Does the county allow the client to provide his or her own interpreter?	X			Client's that request to use their own interpreter must submit form HSA 31 (Non HSA Interpreter).
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			County workers make an early determination as to whether client-provided interpreters are competent. If not, the county worker requests their own interpreter.
Does the county use the CDSS-translated forms in the clients' primary languages?			X	Most of the time. There were instances in the case files reviewed in which conflicting information was provided in the narratives. Some SJ 100 forms were suggesting one language and forms were provided in another.
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			County staff were knowledgeable about any auxiliary aids needed to assist clients that needed accommodation.

Question	Yes	No	Some-times	Comments
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			County workers stated that they read information slowly and carefully to the client, frequently checking for understanding.
Does the county offer screening for learning disabilities?	X			
Is there an established process for offering screening?	X			Screening is offered in the Employment Services program at orientation.
Is the client identified as having a learning disability referred for evaluation?	X			Clients are referred to the local junior college for further examination.

B. Corrective Actions

Area of Findings	Corrective Actions
Written Materials	San Joaquin County must use and provide translated forms, to include translated notice of action forms, in the clients' primary languages when translated by CDSS. Div. 21-115.2

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	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	SJ 100, CWS/CMS	SJ 100, Form ACS 45	SJ 100 Case narrative	SJ 100 Case narrative
Primary language documentation	SJ100, CWS/CMS	SJ 100 Case narrative	SJ 100 Case narrative	SJ 100 Case narrative
Method of providing bilingual services and documentation	Services are normally provided through a certified bilingual worker or the language line. There were cases where the service(s) were not documented.	Services are normally provided through a certified bilingual worker or the language line.	Services are normally provided through a certified bilingual worker or the language line. There were cases where the service(s) were not documented.	Services are normally provided through a certified bilingual worker or the language line. There were cases where the service(s) were not documented.
Client provided own interpreter	HSA 31 Case narrative	HSA 31 Case narrative	HSA 31 Case narrative	HSA 31 Case narrative
Method to inform client of potential problem using own interpreter	Worker verbally informed client of the possibility of ineffective communication and documents in case narrative	Worker verbally informed client of the possibility of ineffective communication and documents in case narrative	Worker verbally informed client of the possibility of ineffective communication and documents in case narrative	Worker verbally informed client of the possibility of ineffective communication and documents in case narrative
Release of information to Interpreter	HSA 31	HSA 31	HSA 31 There were cases reviewed that did not provide this form to match case documentation	HSA 31 There were cases reviewed that did not provide this form to match case documentation

Documented Item	Children's Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Individual's acceptance or refusal of written material offered in primary language	SJ 100	SJ 100	SJ 100	SJ 100
Documentation of minor used as interpreter	Minors not used	Minors not used	Minors not used	Minors 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	As needed	As needed	As needed
Method of identifying client's disability	SOF, Case narrative	ACS 48, SOF, Case narrative	SOF, Case narrative	SOF, Case narrative
Method of documenting a client's request for auxiliary aids and services	Case narrative	Case narrative	Case narrative	Case narrative

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

Areas of Action	Corrective Action
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. Div. 21-116.22

C. Comments

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When reviewing the case files, the CRC provided the reviewer with at least one thousand case numbers of each program being audit. This allowed the reviewer to get a true random sample of the case files. For the most part, San Joaquin County HSA has improved since their last Civil Right compliance review. The adult service programs, IHSS and APS, did an exceptional job in documentation.

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	County workers interviewed were inconsistent in their answers. Some employees stated that they have not been trained since they began employment with the

				county. Others stated they were trained within the past year.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			The Civil Rights Coordinator ensures all county employees are aware of her duties and how to get a hold of her without undue delay.
Does the county provide employees Cultural Awareness Training?	X			All county employees stated that they regularly receive Cultural awareness/diversity 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			

B. Corrective Actions

Training Area	Corrective Action
Division 21, Civil Rights Training	San Joaquin County 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

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			Staff were able to distinguish the different types of complaint without issue.
Did the employees know who the Civil Rights Coordinator is?	X			All staff interviewed were able to name Melissa Sangalang as the civil rights coordinator.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			All staff knew about the posters and were able to provide the location in their respective lobby.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			Since the review was conducted, the civil rights log has been reconciled with CDSS Civil Rights Bureau.

B. Corrective Action

None

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The San Joaquin County Human Services Agency's Civil Rights Compliance Plan for the period May 1, 2012 – April 30, 2013, was received on April 4, 2013. It is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the San Joaquin County Human Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Melissa Sangalang, 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 San Joaquin County Human 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 San Joaquin County Human 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.