



CDSS

WILL LIGHTBOURNE
DIRECTOR

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



EDMUND G. BROWN JR.
GOVERNOR

September 4, 2013

Cheryl L. Spiller, Director
Los Angeles County Department of Public Social Services
12860 Crossroads Parkway South
City of Industry, CA 91746

Dear Ms. Spiller:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office, Ms. Sheila Early during the course of the Civil Rights Compliance Review of Los Angeles County Department of Public Social Services. 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. Daniel Cervantes at (916) 654-0946. You may also contact us 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: Andy Nguyen, Audit Liaison Manager

Mike Papin, Chief
CalFresh Policy Bureau

Marlene Fleming, Chief
Field Operations Bureau

Brian Tam, Chief
CalFresh Management Operations Section

Paul Gardes
CalFresh Policy Bureau

Thuan Nguyen
Refugee Programs Bureau

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

Hope Rios,
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Jodie Berger, Regional Counsel
Legal Services of Northern California

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
LOS ANGELES COUNTY DEPARTMENT
OF PUBLIC SOCIAL SERVICES**

**Conducted on
June 25- July 2, 2013**

**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 Los Angeles County Department of Public Social Services with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted beginning on June 25, 2013 through July 2, 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) |
|----------------------------|--|-----------------|---|
| Southwest Family – 83 | 8300 S. Vermont Ave Los Angeles, CA 90044 | CalWORKs | Spanish |
| South Family - 31 | 17600 A Santa Fe Ave. Rancho Dominguez, CA 90221 | CalFRESH | Spanish Cambodian |
| GAIN Region IV | 3833 S. Vermont Ave. Los Angeles, CA 90037 | GAIN | Spanish |
| IHSS Ops I Chatsworth - 01 | 21415 Plummer St. Chatsworth, CA 91311 | IHSS | Armenian, Spanish, Farsi, Russian |

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2012 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 Neighborhood Legal Services of Los Angeles County, specifically:

Ms. Jin Lee, Staff Attorney
 Administrative Law Advocacy Group
 Neighborhood Legal Services of
 Los Angeles County
 1104 E. Chevy Chase Drive
 Glendale, CA 91205-2511
 (818)291-1787
 (818)291-1795 fax
JinLee@nls-la.org

Please see Section IX of the report for advocate input.

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 |
|------------------------|--------------|------------------|
| Social Workers | 17 | 12 |
| Adult Program Workers | 4 | 1 |
| Receptionist/Screeners | 4 | 2 |
| Total | 25 | 15 |

Program Manager Surveys

| | |
|-------------------------------|---|
| Number of surveys distributed | 3 |
| Number of surveys received | 3 |

Reviewed Case Files

| | |
|--|---|
| English speakers' case files reviewed | 12 |
| Non-English or limited-English speakers' case files reviewed | 64 |
| Languages of clients' cases | English, Spanish, Cambodian, Armenian, Hindi, Farsi, Russian, Tagalog, Punjabi, Thai, Urdu, ASL, Korean |

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 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 or recommendations are stated at the end of each section.

Section IX summarizes the advocates observations and input.

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

III. DISSEMINATION OF INFORMATION

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

A. Findings

| Access to Services, Information and Outreach | Yes | No | Some-times | Comments |
|--|------------|-----------|-------------------|--|
| Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in? | X | | | All offices visited are open for business from 8:00 AM to 5:00 PM. |
| Does the county have extended hours to accommodate clients? | X | | | Social workers in the IHSS program go to the client's homes from the hours of 8:00 AM to 6:00 PM. |
| Can applicants access services when they cannot go to the office? | X | | | Services can also be accessed by mail, Your Benefits Now (YBN), Interactive Voice Response (IVR), the LADPSS Website, and the customer service toll free line. |
| Does the county ensure the awareness of available services for individuals in remote areas? | X | | | Program and service information is available through posters, pamphlets, community outreach, radio announcements, YBN, and the LADPSS 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 | | | All offices visited had the PUB 13 prominently in all available languages. |
| Is the pamphlet distributed and explained to each client at intake and re-certification? | X | | | The PUB 13 is given and explained to clients at intake and recertification. Further, LADPSS employees |

| Signage, posters, pamphlets | Yes | No | Some-times | Comments |
|--|------------|-----------|-------------------|---|
| | | | | document in the appropriate program the distribution/ explanation of the pamphlet. |
| 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, and Vietnamese? | X | | | All offices visited had the PUB 13 prominently in all available 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 | | | See comments above. |
| Was the Pub 13 available in large print (English and Spanish), 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 | | | All workers interviewed were aware of the location of the CRCs information on the required posters. |
| 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 | | | The county does an outstanding job of ensuring instructional and directional signs are posted in the required (at times up to 4) languages. |

B. Corrective Actions

None Required.

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: 21615 Plummer St, Chatsworth, CA 91311

| Facility Element | Findings | Corrective Action |
|------------------|---|--|
| Parking | <p>No van accessible parking space at building's main entrance.</p> <p>Accessible parking space too short at 16 feet.</p> | <p>One in every 8 accessible 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>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p 135</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> |

2. Facility Location: 8300 S. Vermont Ave. Los Angeles, CA 90044

| Facility Element | Findings | Corrective Action |
|------------------|---|---|
| Restroom | <p>Men's:</p> <p>Restroom door pressure excessive at 10 lbs.</p> <p>Woman's:</p> <p>Restroom door pressure excessive at 11 lbs.</p> | <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201</p> |

3. Facility Location: 3833 S. Vermont Ave. Los Angeles, CA 90037

| Facility Element | Findings | Corrective Action |
|-------------------------|--|--|
| Restroom | Men's: Restroom door pressure excessive at 11 lbs. | Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201 |
| | Woman's: Restroom door pressure excessive at 15 lbs. | Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201 |

4. Facility Location: 8300 S. Vermont Ave. Los Angeles, CA 90044

| Facility Element | Findings | Corrective Action |
|-------------------------|------------------------------------|---|
| Exterior entrance | Door pressure 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 |

B. Recommendation

Prior to visiting this office, the threshold languages were English, Spanish, and Cambodian. Upon arriving to the office, I was provided with more current case data by county staff. This information pushed the Cambodian language below the 5% minimum that would require information/directional signage to be in that language in addition to requiring bilingual Cambodian staff in that office per Dymally-Alatorre. Since the case data in this data maintains near the 5%, the State recommends that this office provide directional/information signage in the Cambodian language as well as corresponding staff to match the percentage of Cambodian cases.

If the percentage of cases rises above the 5% minimum, this would become a requirement rather than a recommendation.

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

| Question | Yes | No | Some-times | Comments |
|--|-----|----|------------|---|
| Does the county identify a client's language need upon first contact? How? | X | | | Upon entering the offices visited, there were posters created by AVAZA (LADPSS' language line) posted to help identify the client's language. |
| Does the county use a primary language form? | X | | | PA 481 Language Designation Form |
| Does the client self-declare on this form? | X | | | Client must select his/her oral <u>and</u> written preference. The form must then be signed by the worker and the client. |

| Question | Yes | No | Some-times | Comments |
|--|-----|----|------------|--|
| Are non-English- or limited- English-speaking clients provided bilingual services? | X | | | After clients self declare their oral/written language, they are assigned a bilingual case worker. If a worker is unavailable in the client's language, LADPSS workers can use other county workers and/or the AVAZA Language Line. |
| After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter? | X | | | See comments above. |
| Is there a delay in providing services? | | X | | There was no delay in services provided in the case files reviewed. |
| Does the county have a language line provider, a county interpreter list, or any other interpreter process? | X | | | LADPSS uses AVAZA Language Services Corp. for their over the phone interpreting services. |
| Are county interpreters determined to be competent? | X | | | Bilingual workers are required to demonstrate proficiency by completing oral and written tests. |
| Does the county have adequate interpreter services? | | X | | All of the offices visited had less than the number of required certified bilingual workers per Dymally-Allatore and Division 21. Please see section X, advocate/community input for more information and the required corrective action below. |

| Question | Yes | No | Some-times | Comments |
|--|-----|----|------------|--|
| Does the county allow minors to be interpreters? If so, under what circumstances? | | X | | |
| Does the county allow the client to provide his or her own interpreter? | X | | | If clients wish to provide their own interpreter, they must complete PA 481A. |
| Does the county ensure that the client-provided interpreter understands what is being interpreted for the client? | X | | | LADPSS can/will provide a county interpreter (if necessary) to ensure effective communication. |
| Does the county use the CDSS-translated forms in the clients' primary languages? | X | | | All case files reviewed had forms/notices sent out in the client's designated language. |
| 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 and services are available at each office upon the client's request. |
| Does the county identify and assist the client who has learning disabilities or a client who cannot | X | | | The LADPSS staff and managers interviewed stated that they always ensure the client's needs are met. |

| Question | Yes | No | Some-times | Comments |
|--|-----|----|------------|--|
| read or write? | | | | |
| Does the county offer screening for learning disabilities? | | | | The GAIN program offers screening for learning disabilities based on test results. |
| Is there an established process for offering screening? | X | | | See comments above. |

B. Corrective Actions

| Area of Findings | Corrective Actions |
|------------------|--|
| Bilingual Staff | Los Angeles County Department of Public Social Services shall ensure that a sufficient number of qualified bilingual employees shall be assigned to positions and locations serving a substantial number of non-English-speaking persons. Div. 21-115.1 |

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 | IHSS | GAIN/CalWORKS | Non-Assistance CalFresh |
|--|--|--|--|
| Ethnic origin documentation | SOC 295 Case narrative | GEARS PA 481 | LEADER PA 481 |
| Primary language documentation | SOC 295 Case narrative | GEARS PA 481 | LEADER PA 481 |
| Method of providing bilingual services and documentation | PA 481 Case narrative | GEARS PA 481 | LEADER PA 481 |
| Client provided own interpreter | PA 481A Case narrative | PA 481A Case narrative | PA 481A Case narrative |
| Method to inform client of potential problem using own interpreter | PA 481A Case narrative | PA 481A Case narrative | PA 481A Case narrative |
| Release of information to Interpreter | PA 481A Case narrative | PA 481A Case narrative | PA 481A Case narrative |
| Individual's acceptance or refusal of written material offered in primary language | PA 481 Case narrative | PA 481 Case narrative | PA 481 Case narrative |
| Documentation of minor used as interpreter | The county does not use minors as interpreters | The county does not use minors as interpreters | The county does not use minors as interpreters |
| Documentation of circumstances for using minor interpreter temporarily | N/A | N/A | N/A |

| Documented Item | IHSS | GAIN/CalWORKS | Non-Assistance CalFresh |
|--|-------------------------|-------------------------|--------------------------------|
| Translated notice of actions (NOA) contain translated inserts | CMIPS Case narrative | GEARS Case narrative | LEADER Case narrative |
| Method of identifying client's disability | CMIPS Case narrative | GEARS Case narrative | LEADER Case narrative |
| Method of documenting a client's request for auxiliary aids and services | CMIPS Case narrative | GEARS Case narrative | LEADER Case narrative |

B. Corrective Actions

None.

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

| Interview questions | Yes | No | Some-times | Comments |
|---|------------|-----------|-------------------|---|
| Do employees receive continued Division 21 Training? | X | | | LADPSS staff receive annual Division 21 training. |
| Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint? | X | | | LADPSS employees are instructed to go through their civil rights liaison in their office, who then communicates with the Civil Rights |

| | | | | |
|---|---|--|--|---|
| | | | | Coordinator/investigator as needed. |
| Does the county provide employees Cultural Awareness Training? | X | | | LADPSS staff receives annual cultural awareness (diversity) training. |
| 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 | | | All LADPSS staff interviewed were able to differentiate between the three types of complaints. |
| Did the employees know who the Civil Rights Coordinator is? | X | | | In addition to knowing who the CRC is, the LADPSS staff knew where the CRCs information was posted in the public area of the office as well as the contact information for the CR liaison. |

| Interview and review areas | Yes | No | Some-times | Findings |
|---|------------|-----------|-------------------|---------------------|
| Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint? | X | | | See comments above. |
| When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date? | X | | | |

B. Corrective Action

None

IX. COMMUNITY/ADVOCATE INPUT

The reviewer met with Ms. Jin Lee of the Neighborhood Legal Services. Ms. Lee had concerns about LADPSS that included: A. the number of bilingual staff employed by the county; C. the use of the language line; and E. information not translated on notices sent out to the client in their preferred language.

A. Number of Bilingual Staff

The main concern Ms. Lee shared was the lack of bilingual staff in Los Angeles County. She explained that because of a high number of bilingual cases and not enough bilingual staff, bilingual workers are overworked. She went on to explain that, as a result of this; bilingual workers “take shortcuts, refuse to explain rules, and don’t assist in filling out forms.” Further, clients who are applying for benefits have to deal with “outright verbal abuse and poor treatment by county staff.”

During the review, all of the offices visited were below the minimum number of required bilingual staff. According to Division 21-115, County welfare departments shall ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English speaking population and individuals with disabilities. The number of bilingual positions in each public contact occupational group shall be determined for each program and location whose non-English language cases equal or exceed five percent of the total cases for each program or location. The number of bilingual staff for each 5%

language in a particular office should reflect the proportion of the clients who prefer that language.

B. Corrective Action

Please see corrective action in Section V.

C. Use of Language Line

Another concern Ms. Lee had was the lack of use of the language line. She stated that she has seen cases where the district offices do not use language line for monolingual recipients or applicants who speak a language that is not common in the community where the office is located. In situations where a bilingual staff that speaks the language is not available, the applicant is either told to come back later or go to another office where a worker speaking that language is available. Ms. Lin even stated that some monolingual speakers were sometimes forced to speak English.

D. Recommendation

It is important that a client is never denied the right to free interpretive services, and receives interpretive services without undue delay. County workers should be knowledgeable, proficient, and encouraged to use the language line. CDSS recommends that all LADPSS workers be reminded and encouraged to use the language line when appropriate and necessary to ensure that client receive services clearly and without delay. Division 21-115 states:

County welfare departments shall ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English speaking population and individuals with disabilities. The provision of bilingual/interpretive services shall be prompt without undue delays. This need shall be met as indicated below.

Further, Division 21-115.15 states:

When the percentage of non-English cases in a program and/or location is less than five percent, the agency shall ensure that effective bilingual services are provided. This requirement may be met through utilization of paid interpreters, qualified bilingual employees, qualified employees of other agencies or community resources.

E. Lack of Translated Information on NOAs

The third concern Ms. Lee shared was that inserts (handwritten information in a Notice of Action) in translated IHSS Notices of Action were written and sent out in

English. Division 21 requires that translated forms and documents that have inserts must have inserts that are also translated into the preferred language. Division 21-115.2 states:

Forms and other written material required for the provision of aid or services shall be available and offered to the applicant/recipient in the individual's primary language when such forms and other written material are provided by CDSS. When such forms and other written material contain spaces (other than "for agency use only") in which the CWD is to insert information, this inserted information shall also be in the individual's primary language.

What Ms. Lee found was that the substantive portions that need to be filled out in the client's preferred language are instead written in English.

As noted in Section V, this reviewer did not see this problem in the sample reviewed. This sample included cases in English, Spanish, Farsi, and Armenian. In the Notices of Actions that were sent out to the client/recipient, all of the written information on the NOAs were properly translated into the client's preferred language.

F. Recommendation

However, CDSS recommends that the Civil Rights Coordinator or his designate, and the IHSS program manager, meet with the Neighborhood Legal Services advocate to confer on the aforementioned issues, verify the existence of the problem, identify the extent and nature of the problem, and develop any solutions that can resolve the issue.

X. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Los Angeles County Department of Public Social Services Civil Rights Compliance Plan for the 2013-2014 fiscal year was received in February 2013. It is approved as submitted.

XI. CONCLUSION

The CDSS reviewer found the Los Angeles County Department of Public Social Services staff warm, welcoming, informative and very supportive. Particular thanks to Mr. Charles Palmer and Ms. Sheila Early, 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 Los Angeles County Department of Public Social Services in partial 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 Los Angeles County Department of Public Social Services must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.