



STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



EDMUND G. BROWN JR.  
GOVERNOR

February 7, 2018

Mike F. Ryan, Director  
Orange County Social Services Agency  
500 N. State College Blvd. Ste. 100  
Orange, CA 92868

Dear Mr. Ryan:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of August 21- 25, 2017. 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.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at [crb@dss.ca.gov](mailto:crb@dss.ca.gov).

We will provide a copy of your 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 Elsa Vazquez at (916) 654-2110. You may also contact us by e-mail at [crb@dss.ca.gov](mailto:crb@dss.ca.gov).

Sincerely,

***Original signed by Civil Rights Chief***

Enclosure

c: Carol Taylor, Civil Rights Coordinator

Kim McCoy Wade, Chief  
CalFresh Policy Bureau

Francisco Verduzco, Chief  
Field Operations Bureau

Tami Gutierrez, Chief  
CalFresh Management Operations Section

Paul Gardes  
CalFresh Policy Bureau

Jacqueline Hom  
State Refugee Coordinator

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

Andrew Riesenber  
USDA Food and Nutrition Services  
Supplemental Nutrition Assistance Program (SNAP)  
Western Region

Kevin Aslanian  
Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier  
Western Center on Law and Poverty

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR  
Orange County Social Services Agency**

**Conducted on  
August 21-25, 2017**

**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:**

**Elsa Vazquez**

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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 Orange County Social Services Agency (OCSSA) with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on August 21, 2017 to August 25, 2017. An exit interview was held on August 25, 2017, 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>
<b>Central Region Office</b>	<b>2020 W. Walnut, Santa Ana</b>	<b>CalFresh</b>	<b>Spanish</b>
<b>Adult Services Main Office</b>	<b>1505 E. Warner Avenue, Santa Ana</b>	<b>IHSS/APS</b>	<b>Spanish</b>
<b>South Region</b>	<b>23330/23340 Moulton Pkwy, Laguna Hill</b>	<b>CalWORKs/ WTW</b>	<b>Spanish</b>
<b>Aliso Viejo Regional Center</b>	<b>115 Columbia, Aliso Viejo</b>	<b>CalFresh &amp; Children Family Services</b>	<b>Spanish</b>

### **II. SUMMARY OF METHODOLOGY**

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

- Reviewed the 2017-2018 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 civil rights coordinator
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussion with community advocate groups. In this review the following organization(s) were contacted for feedback.

Legal Aid Society of Orange County  
2101 N. Tustin Ave  
Santa Ana, CA 92705

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

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Program Accessibility for Clients with Disabilities (physical, mental, learning, visual or hearing impairment, etc.)
- Bilingual Staffing/Services for Non-English-Speaking Clients
- 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	9	5
Employment Workers	6	1
Adult Program Workers	6	3
Children Social Workers	3	2
Receptionist/Screeners	4	3
<b>Total</b>	<b>28</b>	<b>14</b>

### Civil Rights Coordinator and Program Manager Surveys

Number of surveys distributed	6
Number of surveys received	6
Number of Civil Rights Coordinator survey distributed	1
Number of surveys received	1

## Reviewed Case Files

English speakers' case files reviewed	3
Non-English or Limited-English speakers' case files reviewed	48
Languages of clients' cases	Arabic, Chinese Farsi, Japanese, Korean, Mandarin Chinese, Spanish, Tagalog, Romanian, Vietnamese,
Reasonable Accommodation Cases	6

Sections III through IX 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 X evaluates the county's Call/Service Centers services provided to non-English speaking clients and clients with a disability.

Section XI 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 XII highlights issues pointed out by Community Input and summarizes Reviewer Observations.

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

## III. DISSEMINATION OF INFORMATION

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

## A. Findings

<b>Access to Services, Information and Outreach</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
Does the county accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	<b>Yes</b>		Office hours are 8:00-5:00 Monday through Friday. At South Region & Aliso Viejo Regional Center, Office hours are 7:00-5:00. Applications can be filed online or mailed in.
Can clients, including those with disabilities, access services when unable to go to the office?	<b>Yes</b>		Clients can access services through My Benefits CalWIN, they can also download CALWIN on their cell phone, apply through One-e-App, or call the Call Center.
Does the county ensure the awareness of available services for individuals in remote areas?	<b>Yes</b>		OCSSA ensures awareness through the county's website, Community Family Resources Centers, Orange County Fair, Health fairs and other events to provide education.

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 8/16)?	<b>Yes</b>		
Is the pamphlet distributed and explained to each client at intake and re-certification?	<b>Yes</b>		All staff interviewed stated they distribute and explain the PUB 13 at intake and re-certification.
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?	<b>Yes</b>		Each site visited had the current version of PUB 13 available in their lobby.

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
Is the Pub 13 available in large print (English and Spanish), CD, and Braille?	<b>Yes</b>		All office sites visited had the PUB 13 available in large print, CD and Braille.
Were the current versions of the required posters present in the lobbies?	<b>Yes</b>		All required posters were present in the lobbies.
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?	<b>Yes</b>		

## **B. Corrective Actions**

None

## **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"	06/18
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 Unit 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: 2020 W. Walnut, Santa Ana

Facility Element	Findings	Corrective Action
Parking	<p>Accessible parking spaces closest to sidewalk do not comply with required ADA measurements, to short in length at 17" long x 11'2" wide.</p> <p>The words <b>"No Parking"</b> need repainting in the access aisle.</p>	<p>Parking space min. dimensions: 9' wide by 18' long. (CA T24 11B-502.2) (ADA 502.2) pg. 166</p> <p>The words <b>"NO PARKING"</b> shall be painted on the surface each access aisle. (CA T24 11B-502.3.3) pg. 166</p>
Men's Restroom	Door pressure is excessive at 10 lbs.	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <p>1. Interior hinged doors and gates: 5 lbs. max.</p>

Facility Element	Findings	Corrective Action
		<p>2. Sliding or folding doors: 5 lbs. max.</p> <p>3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 &amp; 2)) pg. 222</p>
Women's Restroom	<p>There is no wall signage for proper permanent identification.</p> <p>Door pressure is excessive at 10 lbs.</p>	<p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. (CA T24 11B-703.4.2) (ADA 703.4.2) pg. 477</p> <p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <p>1. Interior hinged doors and gates: 5 lbs. max.</p> <p>2. Sliding or folding doors: 5 lbs. max.</p> <p>3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 &amp; 2)) pg. 222</p>

## 2. Facility Location: 1505 E. Warner, Santa Ana

Facility Element	Findings	Corrective Action
Parking	One of the Van access aisle is too narrow at 5' 2" wide.	Van Parking Space Min. Dimensions: 12' wide by 18' long. (CA T24 11B-502.2) (ADA 502.2) pg. 167

Facility Element	Findings	Corrective Action
		<i>Exception:</i> Van parking spaces shall be permitted to be 9' wide (min.) where the access aisle is a min. of 8' wide. (CA T24 11B-502.2) (ADA 502.2) pg. 167

### 3. Facility Location: 23330 Moulton Pkwy, Laguna Hill

Facility Element	Findings	Corrective Action
Parking	<p>Accessible spaces that face building – the one on the left does not comply at 8' 9" wide.</p> <p>Accessible spaces on opposite side facing street are too short in length 16' 6".</p>	Parking space min. dimensions: 9' wide by 18' long. (CA T24 11B-502.2) (ADA 502.2) pg. 166

### 4. Facility Location: 115 Columbia, Aliso Viejo

Facility Element	Findings	Corrective Action
Parking	<p>The van accessible space nearest the building is too short at 16' 6" long.</p> <p>The accessible spaces on the opposite side are too short at 8' wide x 16 long.</p>	<p>Parking space min. dimensions: 9' wide by 18' long. (CA T24 11B-502.2) (ADA 502.2) pg. 166</p> <p>Van Parking Space Min. Dimensions: 12' wide by 18' long. (CA T24 11B-502.2) (ADA 502.2) pg. 167</p>

## **A. Recommendation**

The reviewer recommends to relocate the van-accessible space to the space on the right side of the building. Facility manager was present and advised this space would comply with ADA required measurements.

## **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 if the forms and materials are provided by CDSS in that language, 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**

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
Does the county identify a client's language need upon first contact? How?	<b>Yes</b>		Based on staff interviews and case file reviews, the client's language is identified at the initial contact on the application SAWS1, and/or

Question	Yes	No	Comments
			Reception Referral and recorded in CalWIN.
Does the county use a primary language form?	<b>Yes</b>		The county uses the following forms; titled "Initial Application for CalFresh", and "Reception Referral", which captures the client's primary language. In Adult Programs, there is an Adult Services Language Assessment Form (AS F100).
Does the client self-declare on this form?	<b>Yes</b>		
Are non-English- or limited-English-speaking clients provided bilingual services?	<b>Yes</b>		
After it has been determined that the client is Limited-English or non-English speaking, is there a county process for procuring an interpreter?	<b>Yes</b>		Staff follow Administrative Policy and Procedure E21, staff would request a bilingual worker from a bilingual roster, if there is no bilingual worker who speaks the client's language then worker would call the language line directly.
Does the county have a contracted language line provider, a county interpreter list, or any other interpreter process?	<b>Yes</b>		The county has a contract with Language Solutions to provide interpretive services.
Is there a delay in providing interpretive services?		<b>No</b>	
Are county interpreters certified?	<b>Yes</b>		Staff are certified through an exam process.
Does the county have adequate interpreter services?	<b>Yes</b>		

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
Does the county allow minors to be interpreters? If so, under what circumstances?		<b>No</b>	
Does the county allow the client to provide his or her own interpreter?	<b>Yes</b>		
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	<b>Yes</b>		
Does the county use a Release of Confidentiality Information form for client-provided interpreters?	<b>Yes</b>		Certification of Confidentiality – Non- OCSSA Interpreter F063-02-217
Does the county use the CDSS-translated forms in the clients' primary languages?	<b>Yes</b>		Based on staff interviews all staff state they used CDSS forms in the client's primary language.
Is the information that is to be inserted into NOA translated into the client's primary language?	<b>Yes</b>		Staff stated if they needed to insert information into the NOA, they would translate into the client's language by an interpreter.
If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language?	<b>Yes</b>		
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)?	<b>Yes</b>		Staff interviewed were aware of the auxiliary aids the county has available.

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
Does the county identify a client with a disability (physical, mental, or learning)?	<b>Yes</b>		
Does the county assist clients with self-identifying a disability?	<b>Yes</b>		
Does the county have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?	<b>Yes</b>		Staff interviewed stated they received ADA training.
Does the county offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	<b>Yes</b>		Based on staff interviews, staff state they would offer a reasonable accommodation if a client requested.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	<b>Yes</b>		Based on staff interviews and case file reviews, staff identify in case comments in electronic files, and reception referral form.
Does the county offer a screening for learning disabilities?	<b>Yes</b>		In Welfare to Work
Is there an established process for offering a screening?	<b>Yes</b>		In Welfare to Work
Is the client identified as having a learning disability referred for an evaluation?	<b>Yes</b>		

## **B. Corrective Actions**

No findings.

## 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

<b>How item is Documented Item</b>	<b>Adult Programs (IHSS and/or APS)</b>	<b>CalWORKs &amp; Employment Services</b>	<b>Non-Assistance CalFresh</b>	<b>Children Services</b>
Ethnic origin documentation	SOC 295 CMIPS	SAWS 1 Application & CalWIN	SAWS 1 Application & CalWIN	CWS/CMS Referral Form
Method of identifying client's primary language	Adult Services Language Assessment (AS F100), & Home Visit Case Documents & Assessment Checklist, (F063-23-104)	SAWS 1 Application, & CalWIN	SAWS 1 Application & CalWIN	CWS/CMS Narrative, client ID page
Method of documenting client's primary language	Adult Services Language Assessment (AS F100) & CMIPS	SAWS 1 Application, F063-01-02 Reception Referral Form & CalWIN case comments	SAWS 1 Application, F063-01-02 Reception Referral Form & CalWIN case comments	CWS/CMS Narrative, client ID page
Method of providing bilingual services and documentation	CMIPS & Narrative, Adult Language Assessment	CalWIN case comments *CalWIN translator	CalWIN case comments *CalWIN translator	CWS/CMS Narrative, client ID page

<b>How item is Documented Item</b>	<b>Adult Programs (IHSS and/or APS)</b>	<b>CalWORKs &amp; Employment Services</b>	<b>Non-Assistance CalFresh</b>	<b>Children Services</b>
	AS F100 & CMIPS	Indicator not being coded correctly.  *See below	Indicator not being coded correctly.  *See below	
Client provided own interpreter	CMIPS & case narrative AS F101	CalWIN F063-02-217	CalWIN F063-02-217	CWS/CMS Narrative, client ID page
Method to inform client of potential problem using own interpreter	Verbally and in case narrative	Verbal & F063-02-217 Certificate of Confidentiality -Non-OCSSA Interpreter	Verbal & F063-02-217 Certificate of Confidentiality -Non-OCSSA Interpreter	CWS/CMS
Release of information to Interpreter	Adult Services Use of Non-SSA Interpreter (AS F101)	F063-02-217 Certificate of Confidentiality -Non-OCSSA Interpreter	F063-02-217 Certificate of Confidentiality -Non-OCSSA Interpreter	CWS/CMS
Individual's acceptance or refusal of written material offered in primary language	Home Visit Case Documents/ Narrative & Assessment Checklist, (F063-23-104)	CalWIN case comments	CalWIN case comments	CWS/CMS
Documentation of minor used as interpreter	None found in case review	None found in case review	None found in case review	None found in case review

<b>How item is Documented Item</b>	<b>Adult Programs (IHSS and/or APS)</b>	<b>CalWORKs &amp; Employment Services</b>	<b>Non-Assistance CalFresh</b>	<b>Children Services</b>
Documentation of circumstances for using minor interpreter temporarily	N/A	N/A	N/A	N/A
Method of identifying client's disability	CMIPS, report, case narrative	CalWIN disability indicator, and in case comments	CalWIN disability indicator, and in case comments	CWS/CMS Case narrative
Method of documenting clients' disability (physical, mental, or learning)		CalWIN disability indicator, and in case comments	CalWIN disability indicator, and in case comments	CWS/CMS case narrative
Method of offering a reasonable accommodation to the client with disability	CMIPS case narrative report	CalWIN case comments	CalWIN case comments	CWS/CMS
Method of documenting clients' reasonable accommodation	CMIPS case narrative	Calwin case comments	CalWIN case comments	CWS/CMS Face sheet

## B. Corrective Actions

Areas of Action	Corrective Action
<b>Documentation that bilingual services were provided</b>	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. <b>Div. 21-116.22</b>
<b>General</b>	OCSSA must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. <b>Div. 21-116</b>

## C. Recommendation

OCSSA is committed to ensuring staff are aware of the importance of providing interpretive services and documentation. Their Administrative Policy and Procedure E21 entitled “Sign and Non-English Language Interpretation Services” provides staff with direction on how to provide Interpretive services to their clients.

The reviewer however, came across a discrepancy where cases were not being properly identified in CalWIN demographics; under the “Translator” indicator question. Staff were marking “No” for when a bilingual worker was providing interpretive services. It is recommended that workers should check “Yes” on the CalWIN demographics “Translator” indicator, when asked if the clients require interpreter services. The bilingual worker providing services in the client’s primary language is considered the interpreter.

## D. Observation

During case review, the reviewer found there is an In-House Narrative Worker Tool, which is used to document interpretive services were offered in case files. This tool enables staff to provide thorough interpretive services documentation; and, is scheduled to be rolled out to other programs in the next few months. OCSSA is committed to provide staff with continuous trainings, tools and resources to enable them to provide the best services to their clients

## VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights, cultural awareness, Section 504, and ADA training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

### A. Findings

Interview questions	Yes	No	Comments
Are employees trained in the requirement of Section 504 and ADA?	Yes		ADA Title II Training is covered in the Civil Rights training.
Do employees receive continued Division 21 Training?	Yes		Training is provided in an annual refresher training.
Do employees understand the county policy regarding a client's rights and procedure to follow when receiving a discrimination complaint?	Yes		All staff interviewed stated they were aware of OCSSA's policy regarding discrimination complaint procedure to follow.
Does the county provide employees Cultural Awareness Training?	Yes		
Do the CSW's have an understanding of Multi-Ethnic Placement Act (MEPA)?	Yes		
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	Yes		Training and Career Development (TCD) collaborated with surrounding Multicultural Associations to increase cultural awareness.
Does the county provide training on how to identify clients with disabilities (physical, mental & learning)?	Yes		ADA Title II Training

<b>Interview questions</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
Do employees receive training on reasonable accommodation for clients with disabilities?	<b>Yes</b>		All staff interviewed stated they received training on reasonable accommodation for clients.
Do the employees understand the county policy regarding a client's right to a reasonable accommodation?	<b>Yes</b>		All staff interviewed stated they understand.

### **A. 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, Civil Rights Coordinator, and Program Manager Surveys**

<b>Interview and review areas</b>	<b>Yes</b>	<b>No</b>	<b>Findings</b>
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	<b>Yes</b>		All staff interviewed were able to differentiate between the program, discrimination and personnel complaints.
Do the employees know who the Civil Rights Coordinator is?	<b>Yes</b>		All staff interviewed knew the name of their Civil Rights Coordinator.
Do the employees know the location of the Civil Rights poster "Everyone is Equal... (Pub 86)" with information as to how and where the clients can file a discrimination complaint?	<b>Yes</b>		All staff were aware of the location of the Civil Rights Poster and the process to follow when a client wants to file a discrimination complaint.

<b>Interview and review areas</b>	<b>Yes</b>	<b>No</b>	<b>Findings</b>
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	<b>Yes</b>		

## **IX. VENDOR CONTRACTS**

Counties are required to ensure contracted services with contractors, vendors, consultants, and other providers of service, who receive state or federal assistance, include the assurance of compliance agreement.

### **A. Contracts Review**

Number of Contracts Reviewed	10
Number of Contracts w/Assurance of Compliance Agreement	10

### **B. Corrective Action**

No findings.

## **X. CALL CENTER EVALUATION**

County Call/Service Centers are evaluated to ensure services provided are nondiscriminatory toward non-English speaking clients and clients with a disability (physical, mental, or learning).

No findings.

## **XI. COMMUNITY INPUT**

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups. The following summarizes their observations, and will provide issues that the county management team can address to improve their operations from a civil rights perspective.

\*No response was received from the community solicited.

## **XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL**

Thank you for submitting your agency's Civil Rights Compliance Plan. Before approval, however, we are requesting the following augmentations to your plan:

### **a. Section V. Services to Non-English-Speaking, Limited-English-Speaking and Disabled Applicants/Recipients.**

1. Please provide OCSSA's policy and procedure to identify a client's disability (physical or mental), which could limit access or participation.
2. Please provide OCSSA's policy and procedure to identify a client's need for assistance due to a disability, or inability to read and write.
3. Please provide OCSSA's policy and procedure for providing a reasonable accommodation.
4. Please provide a copy of OCSSA's ADA Title II Training module or power point.

Please submit these items with your corrective action plan for this review.

## **XIII. CONCLUSION**

The CDSS reviewer found the Orange County Social Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Carol Taylor, Civil Rights Coordinator, for organizing the details of the review, and to Joseph Quader, Facilities Manager, who assisted in each of the facility reviews. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Orange County Social 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 Orange County Social 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.