



PAT LEARY
ACTING DIRECTOR

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



GAVIN NEWSOM
GOVERNOR

April 15, 2019

Jim Foley, Director/Public Conservator
Amador County Health and Human Services Agency
10877 Conductor Blvd.
Sutter Creek, CA 95685

Dear Mr. Foley:

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 May 2018. 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 the Web Content Accessibility Guidelines (WCAG) as per California Government Code 7405, we also require the CAP to be submitted electronically as a Word document via [Civil Rights Unit email](mailto:crb@dss.ca.gov) (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 [Civil Rights Unit website](http://www.cdss.ca.gov/inforesources/Civil-Rights/Compliance-Reports-and-Corrective-Action-Plans) (<http://www.cdss.ca.gov/inforesources/Civil-Rights/Compliance-Reports-and-Corrective-Action-Plans>).

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

Sincerely,

ORIGINAL DOCUMENT SIGNED BY

CHRISTINA TEIXEIRA, Manager
Civil Rights Unit
Housing, Homelessness, and Civil Rights Branch

Enclosure

c: Tina Dal Porto, Civil Rights Coordinator

Kim McCoy Wade, Chief
CalFresh Branch

Tami Gutierrez, Chief
CalFresh Operations Bureau

Alexis Fernandez, Chief
CalFresh Policy Bureau

Francisco Verduzco, Chief
CalFresh Technical Assistance and Evaluation Section

Jacqueline Hom
County Operations Manager

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

Maribelle Balbes, Chief
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
Amador County Health and Human Services Agency**

**Conducted on
May 24, 2018**

**California Department of Social Services
Housing, Homelessness, and Civil Rights Branch**

Civil Rights Unit

744 P Street, M.S. 8-16-70

Sacramento, CA 95814

(916) 654-2107

Reviewer: Claudia Cabrera

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I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Unit (CRU) staff was to assess the Amador County Health and 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 on May 24, 2018. An exit interview was held on May 24, 2018, to review the preliminary findings.

The review was conducted in the following location:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Amador County Health and Human Services Agency	10877 Conductor Blvd Sutter Creek, CA	CalFresh, CalWORKs, In Home Supportive Services (IHSS), Children's Services	Spanish

II. SUMMARY OF METHODOLOGY

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

- Reviewed the **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.

Sierra Wind Wellness & Recovery Center
10354 Argonaut Lane
Jackson, CA 95642

Legal Services of Northern California
190 Reamer Street
Auburn, CA 95603

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

Classifications	Total	Bilingual
Eligibility Workers	2	1
Children Social Workers	2	1
Adult Program Workers	2	0
Receptionist/Screeners	1	0
Total	7	2

Civil Rights Coordinator and Program Manager Surveys

Number of surveys distributed: 3

Number of surveys received: 3

Reviewed Case Files

English speakers' case files reviewed: 10

Non-English or limited-English speakers' case files reviewed: 33

Languages of clients' cases: Spanish

Reasonable Accommodation cases reviewed: 0

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: Access to Services, Information and Outreach

Question (Please answer yes/no and provide response with comments.)	Comments
Does the County accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	Yes. Amador County will accommodate clients by obtaining prior manager approval for early appointments and allowing applications to be mailed to the office. Home visits and over the phone application appointments can also be arranged.
Can clients, including those with disabilities, access services when they are unable to go to the office?	Yes. Services are available online at www.c4yourself.com , www.area12.org , and clients can email their worker.
Does the County ensure the awareness of available services for individuals in remote areas?	Yes.

B. Findings: Signage, Posters and Pamphlets

Question (Please answer yes/no and provide response with comments.)	Comments
Does the County use the CDSS pamphlet "Your Rights under California Welfare Programs" (PUB 13)?	Yes. The PUB 13 pamphlet is distributed with the application packet and reviewed during intake and at re-certification.
Is the pamphlet distributed and explained to each client at intake and re-certification?	Yes. The PUB 13 pamphlet is distributed with the application packet and reviewed during intake and at 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?	The English and Spanish versions of the PUB 13 were available in the lobby and information about the availability of all other languages was posted nearby. The PUB 13 audio was not available.
Were the current versions of the required posters present in the lobbies?	Yes, required posters were present in the lobby.
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?	Yes.

C. Corrective Actions

Informational Element	Corrective Action Required
Auxiliary aids	Amador County shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Division 21-115.4

D. 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" (Revised 08/16)

PUB 86 "Everyone is Different, but Equal Under the Law" (Revised 03/07)

Contact the Civil Rights Unit to receive the most recent versions, or download the PUB 13 from the [Civil Rights Unit website](http://www.cdss.ca.gov/inforesources/Civil-Rights/Your-Rights-Under-California-Welfare-Programs) (<http://www.cdss.ca.gov/inforesources/Civil-Rights/Your-Rights-Under-California-Welfare-Programs>).

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: 10877 Conductor Blvd, Amador, CA

Facility Element/Finding	Corrective Action
Main Entrance: Door pressure is high at 12 pounds.	The force for pushing or pulling open a door or gate other than fire doors shall be as follows: 1. Interior hinged doors and gates: 5 pounds maximum 2. Sliding or folding doors: 5 pounds maximum

Facility Element/Finding	Corrective Action
	3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 pounds. Exterior hinged doors: 5 pounds maximum. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 - 2))
Lobby: The publication 13 was not available in audio.	Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all county welfare department (CWD) waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (e.g., cassette tapes, large print, etc.). (Division 21-107.221)

Recommendation: Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action chart above (Section A, 1).

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 it 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 (TDDs), and other effective aids and services for persons with impaired hearing,

speech, vision or manual skills. In addition, counties 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

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County identify a client's language need upon first contact? How?	Yes. Amador County uses a Language Identification Card if the client is non-English speaking or will review the Language Form AM 86 during the initial contact.
Does the County use a primary language form?	Yes. Amador County uses Language Form AM 86.
Does the client self-declare on this form?	Yes. The client will fill out the form.
Are non-English- or limited- English-speaking clients provided bilingual services?	Yes. Bilingual workers are available to provide interpretive services. Amador County also has a contract with Language Line for interpretive services.
After it has been determined that the client is limited-English or non-English speaking, is there a County process for procuring an interpreter?	Yes. Bilingual workers are available to provide interpretive services. Amador County also has a contract with Language Line for interpretive services.
Does the County have a contracted language line provider, a county interpreter list, or any other interpreter process?	Yes. Amador County has a contract with Language Line as well as County staff interpreters.
Is there a delay in providing interpretive services?	No delay. Workers have direct access to Language Line.
Are County interpreters certified?	Yes. Workers are certified through Merit System Services.
Does the County have adequate interpreter services?	Yes.
Does the County allow minors to be interpreters? If so, under what circumstances?	No. Minor interpreters are only used in emergency situations and only to relay information to the client such as rescheduling an appointment date with the worker and bilingual interpreter.
Does the County allow the client to provide his or her own interpreter?	Yes. Clients can provide their own interpreter and must sign the "Applicant's Authorization for Release of Information" form ABCDM 228.

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County ensure that the client-provided interpreter understands what is being interpreted for the client?	Yes. County staff will inform the client-provided interpreter what will be discussed and of the confidentiality of the conversation. If staff observe there may be a problem with the interpreter, they will request a county certified interpreter or use Language Line.
If there is not a Release of Confidentiality Information form, how and where is the client-provided interpreter documented?	The use of a client-provided interpreter is documented in the release form, ABCDM 228 and in case comments.
Does the County use the CDSS-translated forms in the clients' primary languages?	Yes.
Is the information that is to be inserted into NOA translated into the client's primary language?	Yes.
If language to be inserted into NOA is not available, is there a procedure to ensure information is translated to client's primary language?	Yes.
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)?	Yes.
Does the County identify a client with a disability (physical, mental, or learning)?	Yes. Workers will attempt a verbal interaction if they suspect a client may have a disability.
Does the County assist clients with self-identifying a disability?	No. Clients typically self-disclose their disability.
Does the County have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?	No policy in place.
Does the County offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	Yes, if a client self-discloses a disability.
Does the County identify and assist the client who has learning disabilities or a client who cannot read or write?	Yes. Staff will offer to read documents out loud and assist clients by filling out forms. This is documented in case comments or case narratives.
Does the County offer a screening for learning disabilities?	Screening for learning disabilities is done in the welfare to work (WTW) program only, which is part of the CalWORKs program.

Question: (Please answer yes/no and provide response with comments)	Comments
Is there an established process for offering a screening?	No established process but if staff suspect clients are having difficulty in the WTW program, they offer the screening to help clients overcome barriers to employment.
Is the client identified as having a learning disability referred for an evaluation?	Yes. Clients are referred for further evaluation only after they have completed the screening for WTW. .

B. Corrective Action

Area of Findings	Corrective Actions
Effective Services	Amador County must develop and implement a policy that identifies the process to ensure effective services to applicants and recipients who are non-English speaking or who have disabilities. Division 21-115
Learning Disabilities Screening	Amador County must have a protocol in place for screening and evaluating participants in the CalWORKs WTW program with learning disability by trained staff. All County Letter (ACL) No. 01-70 (02-64)

Recommendation: Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action chart above (Section B).

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

Non-Assistance CalFresh

Item	How item is Documented
Ethnic Origin	Application for CalFresh, Consortium-IV (C-IV) Case Summary Page
Method of identifying client's primary language	Application for CalFresh, Language Form AM 86

Item	How item is Documented
Method of documenting client's primary language	Language Form AM 86, C-IV Individual Demographics and Case Summary Page
Method of providing bilingual services and documentation	C-IV Case Comments
Client provided own interpreter	AM 61 Form, C-IV Case Comments
Method to inform client of potential problem using own interpreter	ABCDM 228, AM 61 Form
Release of information to interpreter	ABCDM 228, AM 61 Form, C-IV Case Comments
Individuals acceptance or refusal of written material offered in primary language	Language Form AM 86
Documentation of minor used as interpreter	C-IV Case Comments
Documentation of circumstance for using minor interpreter temporarily	C-IV Case Comments
Method of identifying client's disability	C-IV Case Comments
Method of documenting client's disability (physical, mental, or learning)	C-IV Case Comments
Method of offering a reasonable accommodation to the client with a disability	No documentation found in cases reviewed as there were no reasonable accommodation requests
Method of documenting client's reasonable accommodation	If requested, reasonable accommodation will be documented in C-IV Case Comments

Adult Programs (IHSS)

Item	How item is Documented
Ethnic Origin	Application for Social Services (SOC 293)
Method of identifying client's primary language	SOC 293, Language Form AM 61, Needs and Services Assessment
Method of documenting client's primary language	Needs and Services Assessment, Case Management, Information & Payrolling System (CMIPS) Case Narrative
Method of providing bilingual services and documentation	CMIPS Case Narrative
Client provided own interpreter	ABCDM 228, CMIPS Case Narrative
Method to inform client of potential problem using own interpreter	ABCDM 228

Item	How item is Documented
Release of information to interpreter	ABCDM 228
Individuals acceptance or refusal of written material offered in primary language	CMIPS Case Narrative
Documentation of minor used as interpreter	CMIPS Case Narrative
Documentation of circumstance for using minor interpreter temporarily	CMIPS Case Narrative
Method of identifying client's disability	Needs and Services Assessment
Method of documenting client's disability (physical, mental, or learning)	CMIPS Case Narrative
Method of offering a reasonable accommodation to the client with a disability	Needs and Services Assessment
Method of documenting client's reasonable accommodation	CMIPS Case Narrative

CalWORKs

Item	How item is Documented
Ethnic Origin	C-IV Case Summary Page
Method of identifying client's primary language	C-IV Case Summary Page
Method of documenting client's primary language	C-IV Case Summary Page
Method of providing bilingual services and documentation	C-IV Case Comments
Client provided own interpreter	AM 61 Form, C-IV Case Comments
Method to inform client of potential problem using own interpreter	ABCDM 228, AM 61 Form
Release of information to interpreter	ABCDM 228, C-IV Case Comments
Individuals acceptance or refusal of written material offered in primary language	Language Form AM 86
Documentation of minor used as interpreter	C-IV Case Comments
Documentation of circumstance for using minor interpreter temporarily	C-IV Case Comments
Method of identifying client's disability	C-IV Case Comments
Method of documenting client's disability (physical, mental, or learning)	C-IV Case Comments
Method of offering a reasonable accommodation to the client with a disability	No documentation found in cases reviewed as there were no reasonable accommodation requests

Item	How item is Documented
Method of documenting client's reasonable accommodation	If requested, reasonable accommodation will be documented in C-IV Case Comments

CalFresh Fraud

Item	How item is Documented
Ethnic Origin	C-IV Case Summary Page
Method of identifying client's primary language	C-IV Case Summary Page
Method of documenting client's primary language	C-IV Individual Demographics and Case Summary Page
Method of providing bilingual services and documentation	C-IV Case Comments
Client provided own interpreter	AM 61 Form, C-IV Case Comments
Method to inform client of potential problem using own interpreter	ABCDM 228, AM 61 Form
Release of information to interpreter	AM 61 Form, C-IV Case Comments
Individuals acceptance or refusal of written material offered in primary language	No documentation found in cases reviewed as there were no reasonable accommodation requests
Documentation of minor used as interpreter	C-IV Case Comments
Documentation of circumstance for using minor interpreter temporarily	C-IV Case Comments
Method of identifying client's disability	C-IV Case Comments
Method of documenting client's disability (physical, mental, or learning)	C-IV Case Comments
Method of offering a reasonable accommodation to the client with a disability	No documentation found in cases reviewed as there were no reasonable accommodation requests
Method of documenting client's reasonable accommodation	If requested, reasonable accommodation will be documented in C-IV Case Comments

Children's Services

Item	How item is Documented
Ethnic Origin	Child Welfare Services-Case Management System (CWS-CMS) ID Page
Method of identifying client's primary language	CWS-CMS ID Page

Item	How item is Documented
Method of documenting client's primary language	CMS-CWS Case Narratives, ID Page
Method of providing bilingual services and documentation	CMS-CWS Case Narratives
Client provided own interpreter	ABCDM 228
Method to inform client of potential problem using own interpreter	ABCDM 228
Release of information to interpreter	ABCDM 228
Individuals acceptance or refusal of written material offered in primary language	CMS-CWS Case Narratives
Documentation of minor used as interpreter	CMS-CWS Case Narratives
Documentation of circumstance for using minor interpreter temporarily	CMS-CWS Case Narratives
Method of identifying client's disability	CMS-CWS Case Narratives, ID Page
Method of documenting client's disability (physical, mental, or learning)	CMS-CWS Case Narratives
Method of offering a reasonable accommodation to the client with a disability	No documentation found in case reviewed as there were no reasonable accommodation requests
Method of documenting client's reasonable accommodation	If requested, reasonable accommodation will be documented in CMS-CWS Case Narratives, ID Page

B. Corrective Action

None.

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights, cultural awareness, Section 504 of the Rehabilitation Act of 1973 (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: (Please answer yes/no and provide response with comments)	Comments
Are employees trained in the requirement of Section 504 and ADA?	No. Staff interviewed were unaware of the requirements of Section 504 and the ADA.
Do employees receive continued Division 21 Training?	Yes. Staff interviewed stated they receive training annually.
Do employees understand the County policy regarding a client's rights and procedure to follow when receiving a discrimination complaint?	Yes. Staff interviewed were able to describe the procedure to follow when receiving a complaint.
Does the County provide employees Cultural Awareness Training?	Yes. Staff stated they receive cultural awareness training during the Division 21 civil rights training.
Do the Children Social Workers (CSW) have an understanding of Multi-Ethnic Placement Act (MEPA)?	Yes, CSWs were familiar with the MEPA law and requirements.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	Yes. All staff were able to identify some of the cultural groups in Amador County.
Does the County provide training on how to identify clients with disabilities (physical, mental & learning)?	No training is provided for staff on how to identify clients with disabilities.
Do employees receive training on reasonable accommodation for clients with disabilities?	The IHSS staff stated they have received "IHSS 101" training on how to interact with clients with disabilities and provide reasonable accommodations. All other staff stated they had not received reasonable accommodation training.
Do the employees understand the County policy regarding a client's right to a reasonable accommodation?	Amador County does not currently have a policy in place regarding reasonable accommodations.

B. Corrective Actions

Training Area	Corrective Action
Cultural Awareness and Disability Training	Amador County shall ensure that all public contact employees receive cultural awareness training to ensure that public contact staff has an understanding of and sensitivity to the various cultural groups including individuals with disabilities to ensure equal delivery of services in the County's population. Division 21-117.2

Training Area	Corrective Action
Section 504 of the Rehabilitation Act (Section 504) and the ADA training	Amador Counties shall ensure Section 504 and ADA training for all public contact employees to ensure non-discrimination on the basis of disability. Title II of the ADA, 28 CFR 35.130

Recommendation: Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action chart above (Section B).

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's responsibility to maintain this log.

A. Findings from Staff Interviews, Civil Rights Coordinator, and Program Manager Surveys

Interview and Review Areas: (Please answer yes/no and provide response with comments)	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	Yes. Staff interviewed were able to identify the differences between all three complaints.
Do the employees know who the Civil Rights Coordinator is?	Yes. All staff interviewed identified Tina Dal Porto as the 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?	Yes. All staff indicated posters were available in the lobby.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	Yes.

B. Corrective Actions: None.

Recommendation: None.

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	3
Number of Contracts with an Assurance of Compliance Agreement	3

B. Corrective Action: None.

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).

A. Findings from Call/Service Center site visit and interviews

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County have a Call Center/Service Center?	Amador County does not operate a Call Center. Although there are currently no statutory requirements for call centers, the County maintains avenues in which to meet the demands of applicants, recipients, and clients.

B. Corrective Action: None.

Observation: None.

XI. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups.

Feedback was sought from Sierra Wind Wellness & Recovery Center. No response/input was received.

Feedback was sought from Legal Services of Northern California. They did not have any comments or feedback.

XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

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

1. Provide Amador County's Health and Human Services Agency (HHS) departmental organizational chart, identifying the reporting level of the Civil Rights Unit.
2. Section IV. Dissemination of Information- Provide Amador County HHS information regarding outreach efforts and how information is disseminated and made available to all county residents including individuals who are located in remote areas or who cannot access information during regular business hours.
3. Section V. Services to Non-English-Speaking, Limited-English-Proficient and Disabled Applicants/Recipients- Provide Amador County HHS policies and procedures to identify a client's disability (physical or mental) and how to provide a reasonable accommodation.
4. Section V. Services to Non-English-Speaking, Limited-English-Proficient and Disabled Applicants/Recipients- Provide Amador County HHS policies and procedures for offering free interpreter services and auxiliary aids.
5. Section XII. Discrimination Complaint Procedure- Provide Amador County HHS Discrimination Complaint policies and procedures.

Please submit these items with your CAP for this review.

XIII. CONCLUSION

The CDSS Reviewer found the Amador County Health and Human Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Tina Dal Porto, Civil Rights Coordinator, for organizing the details of the review, and to Jim Foley who assisted in the facility review.

The CDSS found the Amador County HHS in moderate 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 Amador County Health and Human Services Agency must remedy the deficiencies identified in this report by taking corrective actions. A CAP 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 CDSS' intent that this report be used to create a positive interaction between the County and CDSS to identify and correct compliance violations and to provide the County with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights Unit staff is available to provide technical assistance as requested.