



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](http://www.cdss.ca.gov)



GAVIN NEWSOM  
GOVERNOR

February 27, 2019

Ms. Kristin Brinks, Director  
Calaveras Health & Human Services Agency  
509 East St. Charles Street  
San Andreas, CA 95249

Dear Ms. Brinks:

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 September 24-27, 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 timelines 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 Americans with Disabilities Act website accessibility, we also require the CAP to be submitted electronically as a Word document via the [Civil Rights Unit email](mailto:crb@dss.ca.gov) inbox (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 Tiffany Marsh 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 signed by Christina Teixeira*

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

Enclosure

c: Suzette Ariza, 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  
Calaveras County Health and Human Services Agency**

**Conducted on  
September 24-27, 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: Tiffany Marsh**

## **TABLE OF CONTENTS**

- I. INTRODUCTION**
- II. SUMMARY OF METHODOLOGY**
- III. DISSEMINATION OF INFORMATION**
- IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**
- V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE  
NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**
- VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**
- VII. STAFF DEVELOPMENT AND TRAINING**
- VIII. DISCRIMINATION COMPLAINT PROCEDURES**
- IX. VENDOR CONTRACTS**
- X. CALL CENTER EVALUATION**
- XI. COMMUNITY INPUT**
- XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL**
- XIII. CONCLUSION**

## I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Unit (CRU) staff is to assess the Calaveras County Health and Human Services Agency (County) 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 September 24, 2018 to September 27, 2018. An exit interview was held on September 27, 2018 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)
Main San Andreas Office	509 E. St. Charles Street, San Andreas, CA	CalFresh, CalWORKs, Foster Care, and IHSS	Not Applicable
Angels Camp Outreach Station	1168 Booster Way Angels Camp, CA	CalFresh, CalWORKs, and IHSS	Not Applicable
Copperopolis Office	3505 Spangler Lane, Ste. 405, Copperopolis, CA	CalFresh, CalWORKs, and IHSS	Not Applicable
Arnold Outreach Station	2182 Highway 4 Arnold, CA	CalFresh, CalWORKs, and IHSS	Not Applicable

## II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2018/2019 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 Reviewer contacted the following county associated organization for feedback.

The Resource Connection  
444 E. St. Charles Street  
San Andreas, CA 95249  
[www.trcac.org](http://www.trcac.org)

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	2	0
Children Social Workers	1	0
Adult Program Workers	1	0
Receptionist/Screeners	1	0
Total	<b>5</b>	<b>0</b>

#### **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: 5

Non-English or limited-English speakers' case files reviewed: 21

Languages of clients' cases: Afghanis, Arabic, Hmong, Portuguese, 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 findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the County's compliance 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 identified through community input and summarizes Reviewer observations.

Section XIII 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	Comments
Does the County accommodate clients by flexing/extending their hours or allowing applications to be mailed?	Yes. The San Andreas Main Office hours are 8 a.m. to 5 p.m. Staff may schedule appointments outside of standard business hours to accommodate clients.

Question	Comments
Can clients, including those with disabilities, access services when they are unable to go to the office?	Yes. The County has five Outreach Stations for clients to access services. Clients may apply for services online at <a href="http://www.C4Yourself.com">www.C4Yourself.com</a> or mail applications. Staff may visit client's home or an offsite location.
Does the County ensure the awareness of available services to individuals in remote areas?	Yes. The County has brochures available at many Community Based Organizations. Staff provide outreach to Community Partners and network with service providers keeping them informed of available services.

## **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 is available in the San Andreas Main Office lobby. Clients are provided the PUB 13 at intake and re-certification appointments, and at initial contact during an emergency response situation.
Is the pamphlet distributed and explained to each client at intake and re-certification?	Yes.
Is the current PUB 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukrainian, and Vietnamese?	Yes. The current version dated August 2016 is available.
Were the current versions of the required posters present in the lobbies?	Yes. The "Everyone is Different, but Equal Under the Law" (PUB 86) and "And Justice for All" (Form AD 475B) were posted in the main office lobby and the reviewed outreach stations.
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. There were instructional and directional signage posted. Although, the County does not have a substantial number of non-English-speaking clients.



**C. Corrective Actions:** None.

**D. Recommendations:** None.

The County is required to use the latest version of each of the referenced documents. For your information, the most recent versions are:

PUB 13 “Your Rights under California Welfare Programs” (08/16)  
PUB 86 “Everyone is Different, but Equal Under the Law” (03/07)  
Form AD 475B “And Justice for All” (12/15)

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. 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 the 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.

#### **Findings and Corrective Actions**

**1. Facility Location:** 1168 Booster Way, Angels Camp

Facility Element/Finding	Corrective Action
<p>Parking: There was no "Unauthorized Parking" signage posting at the entrance of the parking area.</p>	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8)</p> <p>The additional sign shall not be less than 17 inches wide by 22 inches high. (CA T24 11B-502.8.1)</p> <p>The additional sign shall clearly state in letters with a minimum height of 1 inch the following: Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____. (CA T24 11B-502.8.2)</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2)</p>
<p>Parking: There are no painted parking spaces and access aisles for Van Accessible parking.</p>	<p>1-25=1    26-50=2    51-75=3    76-100=4  101-150=5    151-200=6    201-300=7    301-400=8  401-500 =9    500-1,000=2% of total 1,001+ = 20 +1 for each/100 or fraction thereof over 1,000.  (CA T24 11B-208.2)</p> <p>For every 6 or fraction of 6 parking spaces at least 1 shall be a van parking space.  (CA T24 11B-208.2.4) (ADA 208.2.4)</p> <p>Van Parking Space Minimum Dimensions: 12 feet wide by 18 feet long. (CA T24 11B-502.2) (ADA 502.2)</p> <p>The parking space shall be marked with an ISA in white on a blue background - a minimum 36 inches wide x 36 inches high. (CA T24 11B-502.6.4.1)</p> <p>Access aisle minimum dimensions: 5 feet wide by 18 feet long. (CA T24 11B-502.2) (ADA 4.6.3)</p>

Facility Element/Finding	Corrective Action
	<p>The parking access aisles shall adjoin an accessible route. (CA T24 11B-502.3) (ADA 502.3)</p> <p>Access aisles for van parking spaces shall be located on the passenger side of the parking spaces. (CA T24 11B-502.3.4) (ADA 502.3.4)</p>
<p>Parking: There are no painted parking spaces and access aisles for Accessible parking</p>	<p>Parking space minimum dimensions: 9 feet wide by 18 feet long. (CA T24 11B-502.2) (ADA 502.2)</p> <p>The parking space shall be marked with an ISA in white on a blue background - a minimum 36 inches wide x 36 inches high. (CA T24 11B-502.6.4.1)</p> <p>Access aisle minimum dimensions: 5 feet wide by 18 feet long. (CA T24 11B-502.3.1) (ADA 502.3)</p> <p>Access aisles shall adjoin an accessible route. (CA T24 11B-502.3) (ADA 502.3)</p> <p>Two parking spaces shall be permitted to share a common access aisle. (CA T24 11B-502.3) (ADA 502.3)</p> <p>Access aisles serving car and van parking spaces shall be 5 feet wide min. (CA T24 11B-502.3.1) (ADA 502.3.1)</p>

Facility Element/Finding	Corrective Action
<p>Parking: There are no accessible parking signage posted.</p>	<p>Parking identification signs shall be reflectorized with a minimum area of 70 square inches. (CA T24 11B-502.6.1)</p> <p>Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign. (CA T24 11B-502.6) (ADA 502.6)</p> <p>Exceptions: Signs located within an accessible route shall be a minimum of 80 inches above the finish floor or ground surface measured to the bottom of the sign. (CA T24 11B-502.6)</p> <p>Additional language or an additional sign below the ISA shall state "Minimum Fine \$250". (CA T24 11B-502.6.2)</p> <p>Signs identifying van parking spaces shall contain additional language or an additional sign with the designation "Van Accessible." (CA T24 11B-502.6) (ADA 502.6)</p>
<p>Main Entrance: The door knob cannot be opened with a closed fist. It requires grasping, pinching, and twisting of the wrist.</p>	<p>Operable parts shall be operable with 1 hand and shall not require tight grasping, pinching or twisting of the wrist. (CA T24 11B-309.4) (ADA 309.4)</p> <p>The force required to activate operable parts shall be 5 pounds. (CA T24 11B-309.4) (ADA 309.4)</p> <p>Operable parts of such hardware shall be 34 inches minimum and 44 inches maximum above the finish floor or ground. (CA T24 11B-404.2.7) (ADA 404.2.7)</p>
<p>Restroom: There is no accessible signage with and/or without permanent identification posted on the door or on the wall alongside the latch.</p>	<p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall. (CA T24 11B-703.4.2) (ADA 703.4.2)</p>
<p>Restroom: The force used to open the door was excessive and measured at 10 pounds.</p>	<p>The force required to activate operable parts shall be 5 pounds. (CA T24 11B-309.4) (ADA 309.4)</p>

Facility Element/Finding	Corrective Action
Restroom: The mirror above the sink measured too high at 52 inches.	Mirrors located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 40 inches maximum above the finish floor or ground. (CA T24 11B-603.3) (ADA 603.3)
Restroom: The paper towel dispenser measured too high at 51 inches.	Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route. (CA T24 11B-603.5)  All operable parts, including coin slots, shall be 40 inches maximum above the finish floor. (CA T24 11B-603.5)

**a. Corrective Actions:** Refer to Corrective Action column above (Section A, 1).

**b. Recommendations:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 1).

## 2. Facility Location: 509 E. St. Charles Street, San Andreas

Facility Element/Finding	Corrective Action
Parking: Accessible parking spaces missing the additional signage "Minimum Fine \$250"	Additional language or an additional sign below the ISA shall state Minimum Fine \$250. (CA T24 11B-502.6.2)
Drinking Fountains: The spout outlets measured too high at 38 inches on the first floor and 39 inches on the second floor.	Spout outlets shall be 36 inches maximum above the finish floor or ground. (CA T24 11B-602.4) (ADA 602.4)  The spout shall be located 15 inches minimum from the vertical support and 5 inches maximum from the front edge of the unit, including bumpers. (CA T24 11B-602.5) (ADA 602.5)
First Floor Men's Restroom: There was no wall accessible signage located on the latch side or on the nearest adjacent wall.	Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall. (CA T24 11B-703.4.2) (ADA 703.4.2)

Facility Element/Finding	Corrective Action
Second Floor Restrooms: Accessible door signage measured too high at 61 inches centerline.	The ISA shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the ISA signage. (CA T24 11B-703.7.2.6)
Second Floor Restrooms: Changing table operable part measured above 48 inches forward reach from finish floor.	<p>Baby changing tables shall comply with CA T24 Sections 11B-309 and 11B-902. (CA T24 11B-226.4)</p> <p>Baby changing tables when deployed shall not obstruct the required width of an accessible route except as allowed by CA T24 Section 11B-307.2. (CA T24 11B-226.4)</p> <p>Baby changing tables shall not be located in toilet compartments complying with CA T24 Section 11B-604.8 within a multiple accommodation toilet facility. (CA T24 11B-226.4)</p>
Second Floor Restrooms: The toilet paper dispenser in the accessible stall measured 10 inches centerline from front edge of toilet.	Toilet paper dispensers shall be 7 inches minimum and 9 inches maximum in front of the water closet measured to the centerline of the dispenser. (CA T24 11B-604.7) (ADA 604.7)

**a. Corrective Actions:** Refer to Corrective Action column above (Section A, 2).

**b. Recommendations:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 2).

**3. Facility Location:** 3505 Spangler Lane Ste. 405, Copperopolis

Facility Element/Finding	Corrective Action
Emergency Alarms: There were no audible or visible emergency alarms.	<p>Audible alarm notification shall be provided and emit a distinctive sound that is not to be used for any purpose other than that of a fire alarm. (CA T24 907.5.2.1)</p> <p>Visible alarm notification appliances shall be provided in public use areas and common use areas, including but not limited to:</p> <ul style="list-style-type: none"> <li>- Sanitary facilities including restrooms, bathrooms and shower rooms</li> <li>- Corridors</li> </ul>

Facility Element/Finding	Corrective Action
	<ul style="list-style-type: none"> <li>- Multipurpose rooms</li> <li>- Occupied rooms where ambient noise impairs hearing of the fire alarms</li> <li>- Lobbies</li> <li>- Meeting rooms</li> <li>- Classrooms</li> </ul> (CA T24 907.5.2.3.1)
Restroom: The mirror above the sink measured too high at 41 inches.	Mirrors located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 40 inches maximum above the finish floor or ground. (CA T24 11B-603.3) (ADA 603.3)
Restroom: The paper towel dispenser measured too high at 53 inches.  The soap dispenser measured too high at 43 inches.  The toilet seat protector dispenser measured too high at 50 inches.	Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route. (CA T24 11B-603.5)  All operable parts, including coin slots, shall be 40 inches maximum above the finish floor. (CA T24 11B-603.5)
Restroom: The toilet paper dispenser measured 13 inches from front edge.	Toilet paper dispensers shall be 7 inches minimum and 9 inches maximum in front of the water closet measured to the centerline of the dispenser. (CA T24 11B-604.7) (ADA 604.7)

**a. Corrective Actions:** Refer to Corrective Action column above (Section A, 3).

**b. Recommendations:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 3).

**4. Facility Location:** 2182 Highway 4, Arnold

Facility Element/Finding	Corrective Action
Restroom: The pipes under the sink were not securely insulated.	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5)  There shall be no sharp or abrasive surfaces under lavatories and sinks. (CA T24 11B-606.5) (ADA 606.5)
Restroom: The paper towel dispenser measured too high at 48 inches.  The soap dispenser measured too high at 50 inches.  The toilet seat protector dispenser measured too high at 48 inches.	Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route. (CA T24 11B-603.5)  All operable parts, including coin slots, shall be 40 inches maximum above the finish floor. (CA T24 11B-603.5)

**a. Corrective Actions:** Refer to Corrective Action column above (Section A, 4).

**b. Recommendations:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 4).

**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 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**

<b>Question: (Please answer yes/no and provide responses with comments)</b>	<b>Comments</b>
Does the County identify a client's language need upon first contact? How?	Yes. Clients self-identify by using the "I Speak" language identification card.
Does the County use a primary language form?	Yes. Form 83-2235 "Language Services Form," which identifies language preference for verbal and written communication and interpreter services.
Does the client self-declare on this form?	No. Form 83-2235 is completed by a staff member.
Are non-English- or limited- English-speaking clients provided bilingual services?	Yes. Clients are provided language interpreter services by a bilingual staff member and/or a 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. Clients will be assisted by a bilingual staff member and/or through use of telephonic interpreter services (Language Line).
Does the County have a contracted language line provider, a County interpreter list, or any other interpreter process?	Yes. The County has contracted with Language Line Services.
Is there a delay in providing interpretive services?	No.
Are County interpreters certified?	Yes. County bilingual staff are certified through Merit System Services.
Does the County have adequate interpreter services?	Yes.

<b>Question: (Please answer yes/no and provide responses with comments)</b>	<b>Comments</b>
Does the County allow minors to be interpreters? If so, under what circumstances?	Yes. A minor may be used to interpret only in extreme emergency situations when an interpreter is not available.
Does the County allow the clients to provide their own interpreters?	Yes, and the client must sign a Universal Release of Information form.
Does the County ensure that the client-provided interpreter understands what is being interpreted for the client?	Yes, and the client-provided interpreter must sign an Oath of Confidentiality Form.
If there is not a Release of Confidentiality Information form, how and where is the client-provided interpreter documented?	The County uses the Universal Release of Information form.
Does the County use the CDSS-translated forms in the clients' primary languages?	Yes. The County uses available CDSS-translated forms in clients' primary languages.
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 translated to client's primary language?	Yes. County staff completes and submits a Language Line Document Translation order form to Language Line Services with the information to be translated.
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. The County provides large print material, TTY, and services to assist clients in participating and receiving benefits and services.
Does the County identify a client with a disability (physical, mental, or learning)?	Yes.
Does the County assist clients with self-identifying a disability?	No. Clients self-disclose disabilities.
Does the County have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?	Yes, however, during staff interviews the Reviewer noted not all staff are aware of the County policy for assisting clients with disabilities.
Does the County offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	Yes. Staff interviewed stated they provide accommodations to assist clients to

Question: (Please answer yes/no and provide responses with comments)	Comments
	participate in programs and receive benefits.
Does the County identify and assist the client who has learning disabilities or a client who cannot read or write?	Yes. Staff interviewed stated they assist clients by reading material to the client and ensuring the information is understood, as well as completing forms for clients.
Does the County offer a screening for learning disabilities?	Yes. The County offers screenings through community partners First Five, Calaveras County Office of Education, and medical clinics.
Is there an established process for offering a screening?	Yes. The County offers screenings through the CalWORKs and Welfare to Work programs.
Is the client identified as having a learning disability referred for an evaluation?	Yes. The County will refer client to a community partner for a learning disability evaluation.

**B. Corrective Actions:** Refer to the Comments column above (Section A).

**C. Recommendations:** Inform and training all staff persons about the County's policy for assisting clients with disabilities.

## 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 Statewide Automated Welfare System (SAWS) 1 or 2 and welfare management system Consortium IV (C-IV) Demographics.
Method of identifying client's primary language	Application SAWS 1 or 2 and Form 83-2235 "Language Services Form".
Method of documenting client's primary language	C-IV Demographics and Case Comments.
Method of providing bilingual services and documentation	Form 83-2235 and Case Comments.
Client provided own interpreter	Form 83-2235 and Case Comments.
Method to inform client of potential problem using own interpreter	Form 83-2235.
Release of information to interpreter	Oath of Confidentiality Form and Universal Release of Information Form.
Individuals acceptance or refusal of written material offered in primary language	Form 83-2235.
Documentation of minor used as interpreter	C-IV Case Comments. No comments appeared in case samples because no minors were used as interpreters in the case samples reviewed.
Documentation of circumstance for using minor interpreter temporarily	C-IV Case Comments. There was not a documented circumstance found in the case samples reviewed to suggest temporary use of a minor.
Method of identifying client's disability	Client self-disclose disability at any time when in contact with the staff.
Method of documenting client's disability (physical, mental, or learning)	C-IV Case Comments.

Item	How item is Documented
Method of offering a reasonable accommodation to the client with a disability	Staff to assess and ask if there is a need for a reasonable accommodation when meeting with clients.
Method of documenting client's reasonable accommodation	C-IV Case Comments.

### Adult Programs (IHSS/APS)

Item	How item is Documented
Ethnic Origin	Case Management, Information and Payrolling System (CMIPS) Demographics.
Method of identifying client's primary language	Form 83-2235.
Method of documenting client's primary language	CMIPS Demographics and Case Records.
Method of providing bilingual services and documentation	Form 83-2235 and Case Comments.
Client provided own interpreter	Form 83-2235 and Case Comments.
Method to inform client of potential problem using own interpreter	Form 83-2235.
Release of information to interpreter	Oath of Confidentiality Form and Universal Release of Information Form. This form was not found in the sample cases reviewed because interpreters were not needed in those cases.
Individuals acceptance or refusal of written material offered in primary language	Form 83-2235 and Case Comments.
Documentation of minor used as interpreter	CMIPS Case Records. No comments appeared in case samples because no minors were used as interpreters in the case samples reviewed.
Documentation of circumstance for using minor interpreter temporarily	CMIPS Case Records. There was not a documented circumstance found in the case samples reviewed to suggest temporary use of a minor.

Item	How item is Documented
Method of identifying client's disability	Client self-disclose disability at any time when in contact with the staff.
Method of documenting client's disability (physical, mental, or learning)	CMIPS Case Records.
Method of offering a reasonable accommodation to the client with a disability	A reasonable accommodation may be arranged prior to meeting a client if the need is disclosed to staff prior to a meeting. Staff also ask clients if a reasonable accommodation is needed when meeting with the client. When the need is indicated or documented in case file, staff will arrange for a reasonable accommodation when meeting with the client.
Method of documenting client's reasonable accommodation	CMIPS Case Records.

### **CalWORKs & Employment Services**

Item	How item is Documented
Ethnic Origin	SAWS 1 or 2 and C-IV Demographics.
Method of identifying client's primary language	Application SAWS 1 or 2 and Form 83-2235.
Method of documenting client's primary language	C-IV Demographics and Case Comments.
Method of providing bilingual services and documentation	Form 83-2235 and Case Comments.
Client provided own interpreter	Form 83-2235 and Case Comments.
Method to inform client of potential problem using own interpreter	Form 83-2235 and Case Comments.
Release of information to interpreter	Oath of Confidentiality Form and Universal Release of Information Form.
Individuals acceptance or refusal of written material offered in primary language	Form 83-2235.

Item	How item is Documented
Documentation of minor used as interpreter	C-IV Case Comments. No comments appeared in case samples because no minors were used as interpreters in the case samples reviewed.
Documentation of circumstance for using minor interpreter temporarily	C-IV Case Comments. There was not a documented circumstance found in the case samples reviewed to suggest temporary use of a minor.
Method of identifying client's disability	Client self-disclose disability at any time when in contact with the staff.
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	Staff ask if there is a need for a reasonable accommodation when meeting with clients.
Method of documenting client's reasonable accommodation	C-IV Case Comments.

## Children's Services

Item	How item is Documented
Ethnic Origin	Emergency Referral Sheet and Child Welfare Services (CWS)/Case Management System (CMS) Demographic Summary.
Method of identifying client's primary language	Emergency Referral Sheet and Form 83-2235.
Method of documenting client's primary language	CWS/CMS Demographics and Case Narrative's Delivered Services Log.
Method of providing bilingual services and documentation	CWS/CMS Case Narrative. Inconsistent documentation identified in case samples.
Client provided own interpreter	Form 83-2235 and CWS/CMS Case Narrative.
Method to inform client of potential problem using own interpreter	Form 83-2235.

Item	How item is Documented
Release of information to interpreter	Form 83-2235 and CWS/CMS Case Narrative. Inconsistent documentation identified in case samples.
Individuals acceptance or refusal of written material offered in primary language	Form 83-2235 and CWS/CMS Case Narrative.
Documentation of minor used as interpreter	CWS/CMS Case Narrative. No comments appeared in case samples because no minors were used as interpreters in the case samples reviewed.
Documentation of circumstance for using minor interpreter temporarily	CWS/CMS Case Narrative There was not a documented circumstance found in the case samples reviewed to suggest temporarily use of a minor.
Method of identifying client's disability	Client to self-disclose disability at any time when in contact with the staff.
Method of documenting client's disability (physical, mental, or learning)	CWS/CMS Case Narrative.
Method of offering a reasonable accommodation to the client with a disability	CWS/CMS Case Narrative. Staff ask if there is a need for a reasonable accommodation when meeting with clients. Case samples were of clients without a disability.
Method of documenting client's reasonable accommodation	CWS/CMS Case Narrative. There was no documentation found due to case samples were of clients without a disability.

**B. Corrective Actions:** Refer to chart below.

Element	Corrective Action
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Division 21-116.24



Element	Corrective Action
Documentation that bilingual services were provided	Document the method used to provide bilingual services. For example: assigned worker is bilingual; other bilingual employee acted as interpreter; volunteer interpreter was used; client provided interpreter. Division 21-116.22
General	Counties must ensure that proper and consistent documentation is kept in the file that identifies all the required elements to ensure compliance. Division 21-116

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

## 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 requirements of Section 504 and ADA?	Yes. The requirements of Section 504 and ADA are included in the New Hire Orientation and ongoing Division 21 Civil Rights Training.
Do employees receive continued Division 21 Training?	Yes. Division 21 Training is mandatory for staff every two years and is available for review at any time in the County Civil Rights Employee Handbook and the PowerDMS electronic system used by the County.
Do employees understand the County policy regarding a client's rights and procedure to follow when receiving a discrimination complaint?	Yes. Staff interviewed understand the County policy and procedure for discrimination complaints received from clients.
Does the County provide employees Cultural Awareness Training?	Yes.

<b>Interview Questions: (Please answer yes/no and provide response with comments)</b>	<b>Comments</b>
Do the CSW's have an understanding of Multi-Ethnic Placement Act (MEPA)?	Yes. The County works with the Northern California Training Academy to provide a "CORE" program training including the application of MEPA.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	Yes. Staff interviewed stated they are knowledgeable about predominant cultural groups in the area.
Does the County provide training on how to identify clients with disabilities (physical, mental & learning)?	Yes. This training is included in the Division 21 Training and is available in the County's Civil Rights Employee Handbook.
Do employees receive training on reasonable accommodation for clients with disabilities?	Yes. This training is included in the Division 21 Training and available in the County's Civil Rights Employee Handbook.
Do the employees understand the County policy regarding a client's right to a reasonable accommodation?	Yes.

**B. Corrective Actions:** None.

**C. Recommendations:** 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's responsibility to maintain this log.

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

<b>Interview and Review Areas: (Please answer yes/no and provide response with comments)</b>	<b>Findings</b>
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	Four of five staff interviewed were able to distinguish the difference between each type of complaint.

<b>Interview and Review Areas: (Please answer yes/no and provide response with comments)</b>	<b>Findings</b>
Do the employees know who the Civil Rights Coordinator is?	Four of five staff interviewed identified Suzette Ariza as the County's 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?	Four of five staff interviewed identified the location of the Civil Rights poster in the lobby of the office.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	Yes.

**B. Corrective Actions:** Refer to chart below.

<b>Element</b>	<b>Corrective Action</b>
Discrimination Process	Calaveras County shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Division 21-117 and 21-203
Civil Rights Coordinator	Calaveras County shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Division 21-117 and 21-107.21

**C. Recommendations:** Inform and train all staff persons about the County's complaint processes, including how to identify different types of complaints. Ensure all staff persons are able to identify the Civil Rights Coordinator and have sufficient knowledge about where to locate the identifying information.

## **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.

### **Contracts Review**

**A. Contracts Reviewed:**

Number of Contracts Reviewed	10
Number of Contracts with an Assurance of Compliance Agreement	10

**B. Corrective Actions:** 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**

<b>Question: (Please answer yes/no and provide response with comments)</b>	<b>Comments</b>
Does the County have a Call Center/Service Center?	No. 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:** Not applicable.

**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.

There were no concerns or feedback provided from The Connection Resource Center.

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

The Calaveras County Health and Human Services Agency Civil Rights Compliance Plan for the period August 1, 2018 through July 31, 2019, was received on June 6, 2018. It is approved as submitted.

### **XIII. CONCLUSION**

The CDSS Reviewer found the Calaveras County Health and Human Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Suzette Ariza, Civil Rights Coordinator, for organizing the details of the review and assisted in each of the facility reviews. In the main office and each outreach station, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS Reviewer found the Calaveras County Health and Human Services Agency in substantial satisfactory 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 Calaveras County Health and Human Services Agency must remedy the deficiencies identified in this report by taking corrective actions. A Corrective Action Plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is 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.