

April 21, 2025

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

**EXECUTIVE SUMMARY**

**ALL COUNTY LETTER NO. 25-26**

The purpose of this All County Letter is to remind County Welfare Departments (CWDs) of their existing obligation to maintain a log of all discrimination complaints and to inform CWDs of changes to the closure process for civil rights complaints that do not require investigation. This letter notifies CWDs that quarterly complaint log submission will replace the previous process for reporting the results of civil rights complaints that do not require investigation.



JENNIFER TROIA  
DIRECTOR

CALIFORNIA HEALTH & HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
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GAVIN NEWSOM  
GOVERNOR

April 21, 2025

ALL COUNTY LETTER NO. 25-26

TO: ALL COUNTY WELFARE DIRECTORS  
ALL COUNTY CIVIL RIGHTS COORDINATORS

**SUBJECT: CIVIL RIGHTS COMPLAINT LOG REPORTING REQUIREMENTS**

REFERENCE: [CALIFORNIA DEPARTMENT OF SOCIAL SERVICES \(CDSS\)  
MANUAL OF POLICIES AND PROCEDURES \(MPP\) DIVISION 21;  
ALL COUNTY LETTER \(ACL\) 23-98](#)

This letter informs County Welfare Departments (CWDs) of changes to the closure process for civil rights complaints that do not require investigation. This letter 1) notifies CWDs that quarterly complaint log submission will replace the previous process for reporting the results of civil rights complaints that do not require investigation, and 2) contains reminders about requirements for maintaining complaint logs.

**Civil Rights Complaint Logs**

The California Department of Social Services (CDSS) Manual of Policies and Procedures (MPP) Section 21-203.21 requires CWDs to maintain a control log in which all complaints of discrimination are entered (referred to as the *Complaint Log*). This log must reflect all the following complaints:

- All complaints remanded by the CDSS Civil Rights Section (CRS) to the CWD
- All complaints filed by an applicant/recipient with the CWD involving CDSS-funded, CWD-administered programs that:
  - are labeled or described by the complainant as a “discrimination,” “retaliation,” or “civil rights” complaint;
  - contain mention of any of the legally protected bases; or
  - describe different treatment based on a legally protected basis, even if they do not use the name of the legally protected basis.

The MPP Section 21-203.252 requires CWDs to notify the CDSS of the case resolution for all discrimination and retaliation complaints that do not require an investigation. With

release of this updated guidance, CWDs will fulfill their MPP Section 21-203.252 reporting requirement by submitting a copy of their MPP Section 21-required complaint log to the CDSS each quarter.

For each complaint, the log must at minimum contain all pieces of information required by MPP Sections 21.203.211-.219: complainant's name, date complaint was received, the CDSS case number (if any), program(s) involved, legally protected basis or bases named in the complaint, nature of the complaint, resolution of the complaint, CWD's decision regarding the complaint, and the date the complaint was resolved or the investigation was completed. The log must be sufficiently clear to ensure that a CDSS reviewer can determine the reason that the complaint was closed. (MPP Section 21-116.) CWDs should consult the Attachment to this letter, "Instructions for Completing Discrimination Complaint Log," which describes how to accurately complete each required log category.

The CWDs must ensure that all information on the log is accurate and up-to-date. The log submission must contain all new complaints received within the quarter, and updated information for older complaints, as necessary to ensure information on the log is accurate and current (e.g., the resolution for a withdrawn complaint would need to be updated if the complainant had requested to re-open their complaint). At the time of submission to the CDSS, the log should not contain blank or empty fields; CWDs should use "TBD" or "N/A" as needed to avoid blank or empty fields. Older complaints should not be deleted or removed from the log.

The CWDs may contact the CDSS to request a template complaint log. CWDs may also submit logs in their own format that adhere to the requirements of this letter and MPP Section 21. Logs must be submitted electronically in editable spreadsheet format; PDFs will not be accepted.

### **When to Submit Quarterly Complaint Logs**

The CWDs must submit complaint logs by the following dates of each calendar year.

- May 15: Quarter 1 log due, reflecting complaints received January 1 through March 31
- August 15: Quarter 2 log due, reflecting complaints received April 1 through June 30
- November 15: Quarter 3 log due, reflecting complaints received July 1 through September 30
- February 15: Quarter 4 log due, reflecting complaints received October 1 through December 31

If the due date falls on a weekend or holiday, the CWD must submit their log by the following business day. Extension requests must be submitted to CDSS at least one week before the deadline and must contain the justification for the extension request.

The CWD does not need to submit anything or take any action by a given quarterly deadline if both of the following are true:

- They did not receive any new discrimination complaints in that quarter; and
- There is no new information to report about complaints received in prior quarters (e.g., investigations completed, complaints re-opened, etc.).

**The CWDs must submit their first log by the next upcoming submission deadline.** The CDSS will provide further guidance on how to submit the log in a separate email to Civil Rights Coordinators.

### **Complaints Not Requiring Investigation**

Investigations are not required, and should not be conducted, if the complainant withdraws the complaint, loses contact, or fails to participate in the complaint process. (MPP Section 21-203.81.) Investigations are not required, and should not be conducted, if the complaint is not within the jurisdiction of MPP Division 21, the complaint is missing a required discrimination and/or retaliation complaint element, or the complainant does not have standing to file a complaint. With release of this guidance, CWDs will directly close discrimination and/or retaliation complaints not requiring investigation and notify complainants of the complaint outcome pursuant to MPP Section 21-203.251 and of appropriate appeal rights pursuant to MPP Section 21-203.26 and ACL 23-98.

For discrimination and/or retaliation complaints not requiring investigation, quarterly complaint log submission will replace the previous case-by-case submission to CDSS for review and approval. (Case-by-case submissions are known as “closure requests”.) With release of this guidance, CWDs will **stop** submitting closure requests to CDSS for review, and CDSS will stop reviewing these complaints on a case-by-case basis prior to closure.

### **CDSS Response to Quarterly Complaint Logs**

The CDSS will review all quarterly complaint logs for completion and to ensure they reflect all complaints remanded by the CDSS to the CWD. Pursuant to MPP Section 21-203.252, CDSS will use complaint logs to monitor the closure reason for complaints not requiring investigation. CDSS will maintain the quarterly logs as records of the case resolution for complaints not requiring investigation. (MPP Section 21-203.252.)

The CDSS will follow up with the CWD if logs are incomplete, inaccurate, or missing CDSS-remanded complaints. The CWDs must make requested corrections by the deadline communicated by the CDSS. Failure to submit logs, repeatedly late log submissions, incomplete logs, or logs missing remanded complaints may result in corrective action pursuant to MPP Section 21-205.1.

The CDSS will follow up individually with CWDs regarding case closure requests already submitted to CDSS that fall within the category of discrimination complaints not requiring investigation.

### **Complaints Requiring Investigation**

**This change does not apply to discrimination and or retaliation complaints that require investigation.** The CWDs must continue to submit all civil rights investigation reports to CDSS for review and approval pursuant to MPP Sections 21-203.243 and 21-203.8. The CWDs may not inform the complainant or close discrimination and/or retaliation cases with investigation reports without CDSS approval.

The changes announced in this ACL do not prevent CDSS from requesting to review discrimination and/or retaliation complaint case records and documents during civil rights compliance reviews or if other compliance concerns arise.

### **Inquiries**

If you have any questions or need additional guidance regarding the information in this letter, contact the Civil Rights Section at [crb@dss.ca.gov](mailto:crb@dss.ca.gov).

Sincerely,

### ***Original Document Signed By***

KATHY YANG  
Deputy Director  
Office of Equity Division

Attachment

**Instructions for Completing Discrimination Complaint Log**

| <b>Division 21-203.21 Requirement</b> | <b>Log Field</b>           | <b>Instructions</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------------------------------|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| .211                                  | Complainant name           | <b>Write the name of the complainant.</b> Do not write the name of the complaint filer if they are filing a complaint on behalf of someone else. You may note the filer's name in parentheses.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| .212                                  | Date received              | <b>Write the date the CWD received the complaint.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| .213                                  | CDSS case number           | <b>Write the CDSS case number, if one exists.</b> Use "N/A" if there is no case number.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| .214                                  | Program(s) involved        | <b>Select all programs involved in the complaint.</b> Use "Non-Covered Program" if the program is not within CDSS' jurisdiction. Use "Not specified" if the program is not specified.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| .215                                  | Basis of discrimination    | <b>Select all protected bases named in the complaint.</b> Use "Not a Legally Protected Basis" if the basis is not legally protected. Use "Not specified" if the basis is not specified. Use "retaliation" for retaliation complaints.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| .216                                  | Nature of complaint        | <b>Write a 1-2 sentence description of the issues raised in the complaint.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| .217                                  | Resolution                 | <b>Select the appropriate option that corresponds to the complaint evaluation outcome:</b> <ul style="list-style-type: none"> <li>• Lost contact: "Lost Contact: No Investigation Required"</li> <li>• Withdrawn or withheld consent: "Withdrawal: No Investigation Required"</li> <li>• Beyond 180 days: "Non-jurisdictional: No Investigation Required"</li> <li>• Missing covered entity or program: "Non-jurisdictional: No Investigation Required"</li> <li>• No standing: "No Investigation Required"</li> <li>• Missing a legally protected basis, harm, or nexus: "Missing Prima Facie Elements: No Investigation Required"</li> <li>• Investigation Conducted</li> <li>• <i>Select "TBD" while the complaint is pending (open) and is being evaluated/investigated</i></li> </ul> |
| .218                                  | Decision                   | <b>Select the appropriate option that corresponds to the complaint evaluation outcome:</b> <ul style="list-style-type: none"> <li>• Lost contact: "Procedural Closure"</li> <li>• Withdrawn or withheld consent: "Procedural Closure"</li> <li>• Beyond 180 days: "Decision made that investigation is not required"</li> <li>• Missing covered entity or program: "Decision made that investigation is not required"</li> <li>• No standing: "Decision made that investigation is not required"</li> <li>• Missing a legally protected basis, harm, or nexus: "Decision made that investigation is not required"</li> <li>• Substantiated</li> <li>• Unsubstantiated</li> <li>• <i>Select "TBD" while the complaint is pending (open) and is being evaluated/investigated</i></li> </ul>  |
| .219                                  | Date completed or resolved | <b>Write the date the Complainant was notified of the closure of their complaint.</b> Write "TBD" while the complaint is open.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |