



KIM JOHNSON  
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
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GAVIN NEWSOM  
GOVERNOR

July 26, 2019

Kathryn Harwell, Director  
Stanislaus County Community Services Agency  
P.O. Box 42,  
Modesto, CA 95353-0042

Dear Ms. Harwell:

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 in March 2019. Enclosed is the final report of 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 Ms. Claudia Cabrera at 916-654-1047. 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 & Civil Rights Branch  
Enclosure

c: Bernard Licata, Civil Rights Coordinator

Alexis Fernandez, Acting 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)  
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Kevin Aslanian  
Coalition of California Welfare Rights Organizations, Inc.

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Western Center on Law and Poverty

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Western Center on Law and Poverty

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR  
Stanislaus County Community Services Agency**

**Conducted on  
March 4-7, 2019**

**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 Stanislaus County Community 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 March 4-7, 2019. An exit interview was held on March 7, 2019 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)
Community Services Facility	251 East Hackett Road, Modesto	CalFresh, CalWORKs, Children's Services	Spanish
South County Service Center	1310 West Main Street, Turlock	CalFresh, CalWORKs	Spanish
AAA Building	3525 Coffee Road, Modesto	In Home Support Services (IHSS)	Spanish
Hughson Community Office	2413 3rd Street, Hughson	CalFresh, CalWORKs	Spanish
West County Service Center	101 W. Las Palmas Avenue, Patterson	CalFresh, CalWORKs	Spanish

## II. SUMMARY OF METHODOLOGY

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

- Reviewed the 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 following organization was contacted for feedback:

California Rural Legal Assistance, Inc. (CRLA)  
1111 I Street, Suite 310  
Modesto, CA 95354

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	6	4
Children Social Workers	2	0
Adult Program Workers	2	1
Receptionist/Screeners	5	4
<b>Total</b>	<b>15</b>	<b>9</b>

#### **Civil Rights Coordinator and Program Manager Surveys**

Number of surveys distributed: 7

Number of surveys received: 7

#### **Reviewed Case Files**

English speakers' case files reviewed: 5

Non-English or limited-English speakers' case files reviewed: 85

Languages of clients' cases: Spanish, Farsi, Portuguese, Cambodian, Arabic, American Sign Language (ASL), Lao

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 civil rights 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 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**

<b>Question (Please answer yes/no and provide response with comments.)</b>	<b>Comments</b>
Does the County accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	Yes. Applications can be mailed and staff are allowed to flex their hours for early morning appointments or after-hours appointments with prior supervisor approval.
Can clients, including those with disabilities, access services when they are unable to go to the office?	Yes. Clients can access the C4Yourself online system, Consortium IV (C-IV) Mobile App, and Stanislaus County website at <a href="http://www.stanworks.com">www.stanworks.com</a> . Applications can also be mailed to clients.



Question (Please answer yes/no and provide response with comments.)	Comments
Does the County ensure the awareness of available services individuals in remote areas?	Yes. There are out-stationed offices located in the cities of Patterson and Hughson. Stanislaus County social workers attend community events and share program and benefit information with the public.

**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 included in the application packet.
Is the pamphlet distributed and explained to each client at intake and re-certification?	Yes. The PUB 13 is explained to clients during their initial intake and at re-certifications.
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?	Yes, all offices reviewed had the PUB 13 pamphlets available in their lobbies.
Were the current versions of the required posters present in the lobbies?	Yes. All required posters were present in the lobbies.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non- English-speaking clients translated into appropriate languages?	Yes. Instructional and directional signs were posted in threshold language, Spanish.

- C. Corrective Actions:** The office locations in Hughson and Patterson have a bell located at the entrance to the office. There is a notice posted by the bell that reads "If you need assistance, ring bell." This notice is only in English and shall be translated into the threshold language, Spanish, informing Spanish-speaking clients of the instructions and purpose of the bell. (Division 21-107)

**D. Recommendation**

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

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. 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: 251 East Hackett Road, Modesto**

<b>Facility Element/Finding</b>	<b>Corrective Action</b>
Parking: The entire parking lot does not meet numerous ADA accessibility requirements.	Please refer to <i>Parking Space, Signage and Markings</i> at CA T24 11B-502, California Accessibility Reference Manual (CARM) 2017 edition, pages 158-167 for guidance.

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

**2. Facility Location: 1310 W. Main Street, Turlock**

No ADA deficiencies were identified at this office location.

**Recommendation:** None.

**3. Facility Location: 3525 Coffee Road, Modesto**

Facility Element/Finding	Corrective Action
<p>Parking: The words "No Parking" are not painted in the access aisle corresponding to the parking space on the left side of the building.</p>	<p>The words NO PARKING shall be painted on the surface each access aisle. (CA T24 11B-502.3.3) CARM page 166</p> <p>This notice shall be painted in white letters a minimum of 12 inches in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3) CARM page 166</p>
<p>Main Entrance: First door entering main building, pressure is heavy at 19 pounds.</p> <p>Second door leading to the entrance towards the elevator for IHSS is heavy at 15 pounds.</p>	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> <li>1. Interior hinged doors and gates: 5 pounds maximum</li> <li>2. Sliding or folding doors: 5 pounds maximum</li> <li>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) CARM page 222</li> </ol>
<p>Lobby: No accessible counter. The counter available is high at 38 inches.</p>	<p>A portion of the counter surface that is 36 inches long minimum and 34 inches high maximum above the finish floor or ground shall be provided. (CA T24 11B-904.4.2) (ADA 904.4.2) CARM page 323</p> <p>Knee and toe space complying with Section 38 (11B-306) <i>Clear Floor or Ground Space for Wheelchairs</i> shall be provided under the counter. (CA T24 11B-904.4.2) (ADA 904.4.2) CARM page 323</p> <p>A clear floor or ground space complying with Section 38 (11B-305), <i>Clear Floor or Ground space for Wheelchairs</i> shall be positioned for a forward approach to the counter. (CA T24 11B-904.4.2) (ADA 904.4.2) CARM page 323</p>

Facility Element/Finding	Corrective Action
Emergency Alarm: No audible or visual emergency alarm.	<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) CARM page 56</p> <p>Visible alarm notification appliances shall be provided in public use areas and common use areas, including but not limited to:</p> <p>Sanitary facilities including restrooms, bathrooms and shower rooms, corridors, multipurpose rooms, occupied rooms where ambient noise impairs hearing of the fire alarms, lobbies, meeting rooms, and classrooms. (CA T24 907.5.2.3.1) CARM page 58</p>

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

#### 4. Facility Location: 2413 3<sup>rd</sup> Street, Hughson

Facility Element/Finding	Corrective Action
Main Entrance: Door pressure is excessively heavy at 24 pounds.	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> <li>1. Interior hinged doors and gates: 5 pounds maximum</li> <li>2. Sliding or folding doors: 5 pounds maximum</li> <li>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 &amp; 2)) CARM page 222</li> </ol>

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

#### 5. Facility Location: 101 W. Las Palmas Avenue, Patterson

Facility Element/Finding	Corrective Action
Parking: There is no unauthorized parking signage at the entrance to off-street accessible parking.	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

Facility Element/Finding	Corrective Action
	<p>accessible parking and visible from each parking space. (CA T24 11B-502.8) CARM page 159</p> <p>The additional sign shall not be less than 17 inches wide by 22 inches high. (CA T24 11B-502.8.1) CARM page 159</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) CARM page 159</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) CARM page 159</p>
Accessible parking space wall-mounted sign is low at 55 inches.	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) CARM page 158
Main Entrance: Door pressure is heavy at 16 pounds.	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> <li>1. Interior hinged doors and gates: 5 pounds maximum</li> <li>2. Sliding or folding doors: 5 pounds maximum</li> <li>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) CARM page 222</li> </ol>

**Recommendation:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action chart above (Section A, 5).

## 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**

<b>Question: (Please answer yes/no and provide response with comments)</b>	<b>Comments</b>
Does the County identify a client's language need upon first contact? How?	Yes. Stanislaus County staff use the "I Speak" cards or certified bilingual staff to help assist clients identify their language.
Does the County use a primary language form?	No. Stanislaus County does not use a primary language form. Clients either self-identify on their application or staff help assist identify their primary language.
Does the client self-declare on this form?	Not applicable.
Are non-English- or limited- English-speaking clients provided bilingual services?	Yes.
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. Certified bilingual County staff provide interpretive services or staff use telephone interpretive services through contracted service provider Language Line.
Does the County have a contracted language line provider, a county interpreter list, or any other interpreter process?	Yes, Language Line.

<b>Question: (Please answer yes/no and</b>	<b>Comments</b>
Is there a delay in providing interpretive services?	There is no delay in providing interpretive services.
Are County interpreters certified?	Yes, County interpreters are certified.
Does the County have adequate interpreter services?	Yes, Stanislaus County has adequate interpreter services.
Does the County allow minors to be interpreters? If so, under what circumstances?	Yes, but only in rare situations, and only for the purpose of re-scheduling a future appointment with an interpreter available.
Does the County allow the client to provide his or her own interpreter?	Yes, clients are allowed to provide their own interpreters, but they must be at least 18 years old.
Does the County ensure that the client-provided interpreter understands what is being interpreted for the client?	Yes. If the client-provided interpreter appears to have difficulty understanding or communicating, staff interrupt the interview and do not proceed until staff can communicate effectively using a County-provided interpreter or Language Line.
If there is not a Release of Confidentiality Information form, how and where is the client-provided interpreter documented?	The client-provided interpreter used is documented in the case record.
Does the County use the CDSS-translated forms in the clients' primary languages?	Yes. Stanislaus County is aware of and uses CDSS-translated forms.
Is the information that is to be inserted into NOA translated into the client's primary language?	Yes. The NOA information is translated into the client's primary language.
If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language?	Yes. Stanislaus County certified bilingual staff translate the necessary information on the NOAs.
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)?	No. A client with a disability is identified only upon voluntary disclosure.
Does the County assist clients with self-identifying a disability?	No. A client with a disability is identified only upon voluntary disclosure.
Does the County have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?	Six (6) of the 15 staff interviewed stated they were not aware of a policy and

Question: (Please answer yes/no and provide response with comments)	Comments
	procedure in place for assisting clients with a disability.
Does the County offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	No. A reasonable accommodation is only provided upon client request.
Does the County identify and assist the client who has learning disabilities or a client who cannot read or write?	Yes. For clients who cannot read or write, staff assist clients complete documents or read materials out-loud to clients.
Does the County offer a screening for learning disabilities?	Yes, only in the Welfare to Work (WTW) program.
Is there an established process for offering a screening?	Yes, only in the WTW program.
Is the client identified as having a learning disability referred for an evaluation?	Yes. Clients will be referred to community resources for further evaluation.

## B. Corrective Action

Area of Findings	Corrective Actions
Effective Services	Stanislaus 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, All County Letter (ACL) 19-45

**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, C-IV Case Summary
Method of identifying client's primary language	C-IV Case Summary and Individual Demographics Page
Method of documenting client's primary language	C-IV Case Summary and Case Journal
Method of providing bilingual services and documentation	C-IV Case Journal
Client provided own interpreter	No documentation found in cases reviewed as there were no client-provided interpreters used
Method to inform client of potential problem using own interpreter	No documentation found in cases reviewed as there were no client-provided interpreters used
Release of information to interpreter	No documentation found in cases reviewed as there were no client-provided interpreters used
Individuals acceptance or refusal of written material offered in primary language	C-IV Case Summary
Documentation of minor used as interpreter	No documentation found in cases reviewed as there were no minors used as interpreters
Documentation of circumstance for using minor interpreter temporarily	No documentation found in cases reviewed as there were no minors used as interpreters
Method of identifying client's disability	No documentation found in cases reviewed due to no clients with a disability
Method of documenting client's disability (physical, mental, or learning)	No documentation found in cases reviewed due to no clients with a disability
Method of offering a reasonable accommodation to the client with a disability	No documentation found in cases reviewed due to no reasonable accommodation requests being made by clients
Method of documenting client's reasonable accommodation	No documentation found in cases reviewed due to no reasonable accommodation requests being made by clients

### Adult Programs (IHSS)

Item	How item is Documented
Ethnic Origin	Application for Social Services (SOC 873), Needs Assessment Form (SOC 293), Case Management, Information and Payrolling System (CMIPS) Person Home Page

<b>Item</b>	<b>How item is Documented</b>
Method of identifying client's primary language	CMIPS Service Evidence-Assessment Narrative
Method of documenting client's primary language	CMIPS Service Evidence-Assessment Narrative
Method of providing bilingual services and documentation	CMIPS Case Narrative
Client provided own interpreter	CMIPS Case Narrative
Method to inform client of potential problem using own interpreter	No documentation found in cases reviewed due to inadequate staff documentation
Release of information to interpreter	No documentation found in cases reviewed due to inadequate staff documentation
Individuals acceptance or refusal of written material offered in primary language	CMIPS "blind or visually impaired" Tab
Documentation of minor used as interpreter	No documentation found in cases
Documentation of circumstance for using minor interpreter temporarily	No documentation found in cases reviewed
Method of identifying client's disability	CMIPS Screen for "blind or visually impaired" Tab, CMIPS Service Evidence-Assessment Narrative
Method of documenting client's disability (physical, mental, or learning)	CMIPS "blind or visually impaired" Tab
Method of offering a reasonable accommodation to the client with a disability	CMIPS Case Narrative
Method of documenting client's reasonable accommodation	No documentation found in cases reviewed due to no reasonable accommodation requests being made by clients

## CalWORKs

<b>Item</b>	<b>How item is Documented</b>
Ethnic Origin	C-IV Case Summary and Individual Demographics Page
Method of identifying client's primary language	C-IV Case Summary and Individual Demographics Page
Method of documenting client's primary language	C-IV Case Summary and Case Journal
Method of providing bilingual services and documentation	C-IV Case Journal

<b>Item</b>	<b>How item is Documented</b>
Client provided own interpreter	No documentation found in cases reviewed as there were no client-provided interpreters used
Method to inform client of potential problem using own interpreter	No documentation found in cases reviewed as there were no client-provided interpreters used
Release of information to interpreter	No documentation found in cases reviewed as there were no client-provided interpreters used
Individuals acceptance or refusal of written material offered in primary language	C-IV Case Summary
Documentation of minor used as interpreter	No documentation found in cases reviewed as there were no minors used as interpreters
Documentation of circumstance for using minor interpreter temporarily	No documentation found in cases reviewed as there were no minors used as interpreters
Method of identifying client's disability	No documentation found in cases reviewed due to no clients with a disability
Method of documenting client's disability (physical, mental, or learning)	No documentation found in cases reviewed due to no clients with a disability
Method of offering a reasonable accommodation to the client with a disability	No documentation found in cases reviewed due to no reasonable accommodation requests being made by clients
Method of documenting client's reasonable accommodation	No documentation found in cases reviewed due to no reasonable accommodation requests being made by clients

## **CalFresh Fraud**

<b>Item</b>	<b>How item is Documented</b>
Ethnic Origin	C-IV Case Summary
Method of identifying client's primary language	C-IV Case Summary and Individual Demographics Page
Method of documenting client's primary language	C-IV Case Summary and Individual Demographics Page
Method of providing bilingual services and documentation	Reviewer identified inconsistent documentation due to bilingual staff not documenting services in case file
Client provided own interpreter	No interpretive services documentation found in cases reviewed because bilingual investigators were identified
Method to inform client of potential problem using own interpreter	No interpretive services documentation found in cases reviewed because bilingual investigators were identified

<b>Item</b>	<b>How item is Documented</b>
Release of information to interpreter	No interpretive services documentation found in cases reviewed because bilingual investigators were identified
Individuals acceptance or refusal of written material offered in primary language	C-IV Case Summary
Documentation of minor used as interpreter	No documentation found in cases reviewed as there were no minors used as interpreters
Documentation of circumstance for using minor interpreter temporarily	No documentation found in cases reviewed as there were no minors used as interpreters
Method of identifying client's disability	No documentation found in cases reviewed due to no clients with a disability
Method of documenting client's disability (physical, mental, or learning)	No documentation found in cases reviewed due to no clients with a disability
Method of offering a reasonable accommodation to the client with a disability	No documentation found in cases reviewed due to no reasonable accommodation requests made by clients
Method of documenting client's reasonable accommodation	No documentation found in cases reviewed due to no reasonable accommodation requests being made by clients

## **Children's Services**

<b>Item</b>	<b>How item is Documented</b>
Ethnic Origin	Child Welfare Services-Case Management System (CWS-CMS) ID Page, Emergency Response Referral Information (IN-ERREFR) Form
Method of identifying client's primary language	CWS-CMS Case Transfer Summary Page, IN-ERREFR
Method of documenting client's primary language	CWS-CMS ID Page
Method of providing bilingual services and documentation	Reviewer identified a lack of documentation due to bilingual staff not documenting services in case file
Client provided own interpreter	None found in cases reviewed due to no client-provided interpreter used
Method to inform client of potential problem using own interpreter	None found in cases reviewed due to no client-provided interpreter used
Release of information to interpreter	None found in cases reviewed due to no client-provided interpreter used

Item	How item is Documented
Individuals acceptance or refusal of written material offered in primary language	CWS-CMS Case Narrative and Delivered Services Log
Documentation of minor used as interpreter	No documentation found in cases reviewed as there were no minors used as interpreters
Documentation of circumstance for using minor interpreter temporarily	No documentation found in cases reviewed as there were no minors used as interpreters
Method of identifying client's disability	No documentation found in cases reviewed due to no clients with a disability
Method of documenting client's disability (physical, mental, or learning)	No documentation found in cases reviewed due to no clients with a disability
Method of offering a reasonable accommodation to the client with a disability	No documentation found in case reviewed due to no reasonable accommodation requests being made by clients
Method of documenting client's reasonable accommodation	No documentation found in case reviewed due to no reasonable accommodation requests being made by clients

## B. Corrective Action

Areas of Action	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, or client provided interpreter. Division 21-116.22
General	Stanislaus County must ensure that proper and consistent documentation is kept in the file that identifies all the required elements to ensure and demonstrate compliance. Division 21-116

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

**Observation:** Stanislaus County uses an IHSS Stan 9 "Recipient Authorization for Release of Information Interpreter Statement" Form (IHSS Stan 9) to document the use of client-provided interpreters. This form is kept in the client's paper case file and is not electronically scanned in CMIPS. The only documentation found in the CMIPS cases reviewed was a checkbox for "Interpreter Statement" that is meant to inform staff that the IHSS Stan 9 was obtained and is in the paper file. This process was unclear to the Reviewer. Stanislaus County CSA shall take appropriate action to ensure that all IHSS staff are aware of documentation requirements in case files to inform clients of potential

problems using their own interpreter and document the interpreter release of information was provided and obtained to comply with Division 21-116.1, which states that “Each agency shall maintain case record documentation in sufficient detail to permit a reviewer to determine the agency's compliance with the requirements of Division 21.”

## **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**

<b>Interview Questions: (Please answer yes/no and provide response with comments)</b>	<b>Comments</b>
Are employees trained in the requirement of Section 504 and ADA?	No. Staff interviewed were not aware and have not been provided with Section 504 and ADA training.
Do employees receive continued Division 21 Training?	Yes. Division 21 training is provided annually.
Do employees understand the County policy regarding a client's rights and procedure to follow when receiving a discrimination complaint?	Yes. All staff interviewed stated they are aware of and contact Bernard Licata, Civil Rights Coordinator.
Does the County provide employees Cultural Awareness Training?	Yes. All staff interviewed stated they receive cultural awareness training via an annual Cultural Heritage Event. Attendance is mandatory for Stanislaus CSA staff.
Do the CSW's have an understanding of Multi-Ethnic Placement Act (MEPA)?	Yes. The Children Services Workers interviewed stated they all understand and received MEPA training.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	Yes. All staff interviewed are knowledgeable about the predominant cultural groups in their area.
Does the County provide training on how to identify clients with disabilities (physical, mental, and learning)?	No training is provided to staff on identifying clients with disabilities.
Do employees receive training on reasonable accommodation for clients with disabilities?	No training is provided to staff on reasonable accommodation for clients with disabilities.

<b>Interview Questions: (Please answer yes/no and provide response with comments)</b>	<b>Comments</b>
Do the employees understand the County policy regarding a client's right to a reasonable accommodation?	Stanislaus County has recently adopted and is in the process of implementing a new reasonable accommodation policy.

## **B. Corrective Actions**

<b>Training Area</b>	<b>Corrective Action</b>
Section 504 and ADA training	Stanislaus County shall provide Section 504 and ADA training to all public contact employees to ensure non-discrimination on the basis of disability. Title II of the ADA, 28 CFR 35.130, All County Letter 19-45

**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**

<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?	Yes. All staff interviewed identified the differences between all three complaints.
Do the employees know who the Civil Rights Coordinator is?	Yes. All staff interviewed identified Bernard Licata 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 stated posters were available in the lobby.

<b>Interview and Review Areas: (Please answer yes/no and provide response with comments)</b>	<b>Findings</b>
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	4
Number of Contracts with an Assurance of Compliance Agreement	4

**B. Corrective Action:** None.

**Recommendation:** 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?	Yes, Stanislaus County operates a Benefits Call Center.
Is the Call Center/Service Center Publicly accessible to clients?	There is no public access to the Benefits Call Center.
Does the Call Center/Service Center answer calls for the entire County, by district, or regional office?	The Benefits Call Center answers calls for the entire County.
Does the Call/Service Center have an Interactive Voice Response system?	Yes, the Benefits Call Center has an interactive voice response system.



<b>Question: (Please answer yes/no and provide response with comments)</b>	<b>Comments</b>
If so, does the Interactive Voice Response system have language options for all County threshold languages?	Yes, Spanish is available.
Does the Interactive Voice Response system have an option to request free interpretive services?	Yes.
Is the Call/Service Center accessible to clients with a disability (hearing impaired, physical, mental, or learning)?	Yes.
Does the Call/Service Center accommodate clients with a disability (physical, mental, or learning)?	Yes.
Are the Call/Service Center calls monitored for quality assurance?	Yes, supervisors can monitor live telephone calls.
Does the Call/Service Center staff provide services to client's individual case?	Yes. CalFresh application interviews can be conducted over the phone with the option for clients to submit e-signatures.
Does the Call/Service Center staff identify and document the client's preferred language?	Yes. All staff interviewed stated they have direct access to client case files and can document the client's preferred language.
Does the Call/Service Center staff document the method of providing bilingual interpretive services?	Yes.

**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 CRLA, Inc. No response or input was received.

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

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

1. Section II. Assignment of Resources:

- Provide the Stanislaus County CSA conflict of interest policy regarding employees conducting investigations as specified in Division 21, Section 203.3.

2. Section V. Services to Non-English-Speaking, Limited-English-Proficient and Disabled Applicants/Recipients:

- Provide procedures for offering a language identification form to a client and the timing for offering such a form. Provide a copy of the form.
- Provide procedures for when an applicant/recipient fails to self-identify primary language, including actions to be taken by a worker and procedures for disclosing such action to the applicant/recipient.
- Provide the Stanislaus County CSA policies and procedures for offering free interpreter services and auxiliary aids as specified in Division 21, Section 115.
- Provide the Stanislaus County CSA procedures, if any, for capturing and reporting statistics regarding the number of cases, by program, of individuals who are identified (self-identified or otherwise identified) as having a disability as specified in Division 21, Section 115.

3. Section VI. Documentation of Applicants'/Recipients' Case Records:

- Provide the Stanislaus County CSA policies and procedures for documentation in applicants'/recipients' case files as specified in Division 21, Section 116.

4. Section XII. Discrimination Complaint Procedure:

- Provide the Stanislaus County CSA discrimination complaint policies and procedures as specified in Division 21, Section 203.

Ensure the policy is updated with the information below:

- Age complaints. See ACL 18-03 for specific instructions regarding age discrimination complaints. The current Stanislaus County CSA policy is inaccurate;
- Protected classes. Update all protected bases. See CDSS Form GEN 1179 *Complaint of Discrimination* (revised 5/18) for reference;
- General discrimination complaint handling. See Division 21-203 *Complaints of Discriminatory Treatment* for specific details on investigating discrimination complaints as well as closure complaint files. The current Stanislaus CSA policies are inaccurate.

Please submit these items with your CAP for this review.

### **XIII. CONCLUSION**

The CDSS Reviewer found the Stanislaus County Community Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Bernard Licata, Civil Rights Coordinator, for organizing the details of the review, and to Elizabeth Hewitt, Civil Rights Investigator and Mark Zachreus, Facility Manager, who assisted in each of the facility reviews. In each office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Stanislaus County Community Services Agency in partial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The Stanislaus County Community 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.