



KIM JOHNSON
DIRECTOR

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



GAVIN NEWSOM
GOVERNOR

July 22, 2019

Karen Larsen, Director
Yolo County Health & Human Services Agency
25 North Cottonwood Street
Woodland, CA 95695

Dear Ms. Larsen:

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 January 2019 Civil Rights Compliance Review. Enclosed is the final review report.

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 Daniel Cervantes at 916-654-0946. You may also contact us via the [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: Jessica Morrish, 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)
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
Yolo County Health & Human Services Agency**

**Conducted on
January 22-24, 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 Yolo County Health & Human Services Agency with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on January 22-24, 2019. An exit interview was held on January 24, 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)
Yolo County Health & Human Services Agency	25 North Cottonwood Woodland, CA	CalFresh, CalWORKs	Spanish, Russian
Yolo County Health & Human Services Agency	137 North Cottonwood Woodland, CA	In Home Supportive Services (IHSS), Children's Services	Spanish, Russian
Yolo County Health & Human Services Agency	500 Jefferson Blvd West Sacramento, CA	CalFresh, CalWORKs	Spanish, Russian
Yolo County Health & Human Services Agency	111 E. Grant Ave Winters, CA	CalFresh, CalWORKs	Spanish, Russian

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2018 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the County.

Headquarters and on-site review procedures included:

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

Coalition of California Welfare Rights Organizations (CCWRO)
1111 Howe Avenue, Suite 150
Sacramento CA 95825

Legal Services of Northern California (LSNC)
619 North Street
Woodland CA 95695

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

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Program Accessibility for Clients with Disabilities (physical, mental, learning, visual or hearing impairment, etc.)
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	6	4
Children Social Workers	4	2
Adult Program Workers	1	1
Receptionist/Screeners	4	2
Total	15	9

Civil Rights Coordinator and Program Manager Surveys

Number of surveys distributed: 4

Number of surveys received: 4

Reviewed Case Files

English speakers' case files reviewed: 8

Non-English or limited-English speakers' case files reviewed: 78

Languages of clients' cases: Spanish, Russian, Guatemalan, Thai, Farsi, Pushto

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

Question (Please answer yes/no and provide response with comments.)	Comments
Does the County accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	Yes. Applications can be mailed in and staff are allowed to flex their hours 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 Yolo County website, call to have an application mailed to them, request telephone interviews, and/or request a home visit as an accommodation.
Does the County ensure the awareness of available services for individuals in remote areas?	Yes. There is an out-stationed office located in the city of Winters that provides access to rural residents. A CalFresh Public Assistance Specialist is stationed at the University of California Davis once a week and provides services to the student population. Yolo County also participates in community events such as local health fairs.

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 and part of the re-certification process.
Is the pamphlet distributed and explained to each client at intake and re-certification?	Yes. The PUB 13 is explained to clients during 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?	No. All offices reviewed only had the English, Spanish, and Russian versions of the PUB 13 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 the County's threshold languages of Spanish and Russian.

C. Corrective Actions

Informational Element	Corrective Action Required
Translated PUB 13	Yolo County shall ensure that the current version of the PUB 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language. Division 21-115.2

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

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

PUB 13 “Your Rights under California Welfare Programs” (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: 25 North Cottonwood, Woodland, CA

Facility Element/Finding	Corrective Action
<p>Parking:</p> <p>The words "No Parking" are painted on the pavement in access aisles but they are small, measuring 3 inches.</p>	<p>The words NO PARKING shall be painted on the surface each access aisle. (CA T24 11B-502.3.3); California Accessibility Reference Manual, 2017 Edition (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>Unisex Restroom:</p> <p>Soap dispenser is high at 43 inches.</p> <p>Toilet protector is high at 43 inches.</p>	<p>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); CARM page 382</p> <p>All operable parts, including coin slots, shall be 40 inches maximum above the finish floor. (CA T24 11B-603.5); CARM page 382</p>
<p>Men's Restroom:</p> <p>Door sign is high at 65 inches.</p> <p>Wall sign is high at 61 inches.</p>	<p>The International Symbol of Accessibility (Symbol) shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol. (CA T24 11B-703.7.2.6); CARM page 376</p>

Facility Element/Finding	Corrective Action
<p>Women's Restroom:</p> <p>Door sign is high at 64 inches.</p> <p>Wall sign is high at 68 inches.</p>	<p>The Symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol. (CA T24 11B-703.7.2.6); CARM page 376</p>

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: 111 E. Grant Ave, Winters, CA

Facility Element/Finding	Corrective Action
<p>Main Entrance:</p> <p>No directional signage to accessible entrance.</p>	<p>Directional signs complying with Visual Characters heading in Section 63 (11B-703.5), <i>Signs & Identification</i>, including the Symbol complying with Symbol heading in Section 63 (11B-703.7.2.1) <i>Signs & Identification</i>, indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path. (CA T24 11B-216.6); CARM page 35</p> <p>Visual characters shall be 40 inches minimum above the finish floor or ground. (CA T24 11B-703.5.6) (ADA 703.5.6); CARM page 449</p>
<p>Door pressure is high at 9 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"> 1. Interior hinged doors and gates: 5 pounds maximum 2. Sliding or folding doors: 5 pounds maximum 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
<p>There is no knee space at the counter.</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>

Facility Element/Finding	Corrective Action
	<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>
<p>Unisex Restroom:</p> <p>Door pressure is high at 7 pounds.</p>	<p>The force required to activate operable parts shall be 5 pounds. (CA T24 11B-309.4); (ADA 309.4); CARM page 221</p>

Recommendation: Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action chart above (Section A, 2).

3. Facility Location: 500 Jefferson Blvd, West Sacramento, CA

Facility Element/Finding	Corrective Action
<p>Main Entrance:</p> <p>No directional signage informing clients of the main entrance to building.</p>	<p>Directional signs complying with <i>Visual Characters</i> heading in Section 63 (11B-703.5), <i>Signs & Identification</i>, including the Symbol complying with Symbol heading in Section 63 (11B-703.7.2.1), <i>Signs & Identification</i>, indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path. (CA T24 11B-216.6); CARM page 35</p> <p>Visual characters shall be 40 inches minimum above the finish floor or ground. (CA T24 11B-703.5.6); (ADA 703.5.6); CARM page 449</p>
<p>Lobby:</p> <p>No accessible counter. Counter available is high at 41 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>

Facility Element/Finding	Corrective Action
	<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>
<p>Client Interview Room:</p> <p>Room I-6 has been designated as the accessible client interview room. No accessible signage posted.</p>	<p>Installation height above finished floor shall be 40 inches minimum. Please see Table 11B-703.5.5, CARM page 449; (CA T24 11B-703.5); (ADA 703.5); CARM page 455</p>
<p>No clear turnaround space in Client Interview Room I-6.</p>	<p>Where the accessible route makes a 180 degree turn around an element which is less than 48 inches wide, clear width shall be 42 inches minimum approaching the turn, 48 inches minimum at the turn and 42 inches minimum leaving the turn. (CA T24 11B-403.5.2); (ADA 403.5.2); CARM page 212</p> <p>The turning space shall be a space of 60 inches diameter minimum. (CA T24 11B-304.3.1); (ADA 304.3.1); CARM page 306</p> <p>The turning space shall be a T-shaped space within 60 inches by 60 inches minimum square with arms and base 36 inches wide minimum. (CA T24 11B-304.3.2); CARM page 306</p>
<p>Directional & Informational signage not in threshold languages (Spanish, Russian).</p>	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Division 21-107.212)</p>
<p>Men's Restroom:</p> <p>Sign on wall is high at 64 inches.</p>	<p>The Symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the Symbol. (CA T24 11B-703.7.2.6); CARM page 376</p>

Facility Element/Finding	Corrective Action
Sign on door is missing tactile Braille characters.	Tactile characters on signs must be located 48 inches minimum above the finish floor or ground surface, measured from the baseline of the lowest Braille cells and 60 inches maximum above the finish floor or ground surface, measured from the baseline of the highest line of raised characters. (CA T24 11B-703.4.1)
<p>Women's Restroom:</p> <p>Sign on wall is high at 66 inches.</p> <p>Sign on door is missing tactile Braille characters.</p>	<p>The Symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the Symbol. (CA T24 11B-703.7.2.6) CARM page 376</p> <p>Tactile characters on signs must be located 48 inches minimum above the finish floor or ground surface, measured from the baseline of the lowest Braille cells and 60 inches maximum above the finish floor or ground surface, measured from the baseline of the highest line of raised characters. (CA T24 11B-703.4.1)</p>

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

Observation: Client Interview Room I-6, designated as accessible, had 5 chairs in the room and was too crowded for the required turnaround space. The County should ensure the room is clear of extra furniture to avoid reducing the turnaround space necessary for a client in a wheelchair.

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a County may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which it can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a

substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDDs), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, counties must ensure that written materials be available in individuals' primary languages if the forms and materials are provided by CDSS in that language, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County identify a client's language need upon first contact? How?	Yes. When clients are in the office, Yolo County staff use the "I Speak" cards or certified bilingual staff to help assist clients identify their language needs. Clients may also self-identify their language needs via the online application process through www.mybenefitscalwin.org .
Does the County use a primary language form?	No, but preferred language and need for an interpreter are asked on page two of the County-created Inquiry Document and Information Clearance Sheet (YC9) that captures primary language.
Does the client self-declare on this form?	Yes. The client self-declares and completes the YC9 form.
Are non-English- or limited- English-speaking clients provided bilingual services?	Yes. Yolo County certified bilingual staff provide interpretive services and/or use interpretive telephone services provided by Language Line.
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. Yolo County uses certified bilingual staff to provide interpretive services and/or use Language Line.
Does the County have a contracted language line provider, a county interpreter list, or any other interpreter process?	Yes. Yolo County has contracts with Language Line and NorCal Services for the Deaf and Hard of Hearing.

Question: (Please answer yes/no and provide response with comments)	Comments
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. Yolo County has adequate interpreter services.
Does the County allow minors to be interpreters? If so, under what circumstances?	No minors allowed to be used as interpreters.
Does the County allow the client to provide his or her own interpreter?	Yes. Clients are allowed to provide their own interpreters and must complete the Interpreter Confidentiality/Customer Notification/Release of Information and Acceptance/Refusal of Translated Form (YC 173).
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 may stop the interview until they are able to communicate with the client effectively using a County-provided certified interpreter or Language Line.
If there is not a Release of Confidentiality Information form, how and where is the client-provided interpreter documented?	Form YC 173 is used and is documented in case comments, and a copy of the YC 173 is scanned into the Compass Pilot System.
Does the County use the CDSS-translated forms in the clients' primary languages?	Yes. Yolo 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 a NOA is not available, is there a procedure to ensure information translated to client's primary language?	Yes. Yolo County certified bilingual staff translate necessary information on NOAs and include the Notice of Language Services Form (GEN 1365) when mailing 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. Clients with a disability are identified only upon voluntary disclosure during initial

Question: (Please answer yes/no and provide response with comments)	Comments
	contact. This is documented in the case comments.
Does the County assist clients with self-identifying a disability?	No. Clients with a disability are identified only upon voluntary disclosure during initial contact.
Does the County have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?	No. Yolo County does not have a policy and procedure in place for assisting clients with a disability.
Does the County offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	The County only offers accommodations if requested by a client.
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 offer to assist by reading and explaining information to ensure clients understand what is being given to them. Staff also assist clients complete forms.
Does the County offer a screening for learning disabilities?	The County only screens for learning disabilities 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 are referred for further evaluation.

B. Corrective Action

Area of Findings	Corrective Actions
Interpretive Services and Accessibility	Yolo County shall ensure that administrative practices do not have the effect of denying non-English speaking persons and individuals with disabilities equal access to and participation in the available programs and activities. Division 21-115.3
Effective Services	Yolo 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 (SAWS1), CalWIN Demographics
Method of identifying client's primary language	SAWS1, Form YC9, CalWIN Demographics
Method of documenting client's primary language	CalWIN Demographics and Case Comments
Method of providing bilingual services and documentation	CalWIN cases reviewed were inconsistent with the documentation of bilingual services. Several non-English cases were missing documentation identifying who provided interpretive services and in what language.
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	CalWIN Case Comments
Documentation of minor used as interpreter	None found in cases reviewed due to minors not being allowed to interpret
Documentation of circumstance for using minor interpreter temporarily	None found in cases reviewed due to minors not being allowed to interpret
Method of identifying client's disability	Not applicable; clients did not have disabilities.
Method of documenting client's disability (physical, mental, or learning)	Not applicable; clients did not have disabilities.
Method of offering a reasonable accommodation to the client with a disability	No documentation found in cases reviewed due to no reasonable accommodation requests
Method of documenting client's reasonable accommodation	No documentation found in cases reviewed due to no reasonable accommodation requests

Adult Programs (IHSS)

Item	How item is Documented
Ethnic Origin	Application for Social Services (SOC 873), Needs Assessment Form (SOC 293), Case Management, Information & Payrolling System (CMIPS) Person Home Page
Method of identifying client's primary language	CMIPS Person Home Page
Method of documenting client's primary language	SOC 293, CMIPS Person Home Page and Case Narrative
Method of providing bilingual services and documentation	CMIPS cases reviewed were inconsistent with the documentation of bilingual services. Several non-English cases were missing documentation identifying who provided interpretive services and in what language.
Client provided own interpreter	CMIPS Case Narrative
Method to inform client of potential problem using own interpreter	Release of Information Form (YC 445 D)
Release of information to interpreter	Form YC 445 D
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 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	CMIPS "blind or visually impaired" Tab
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	No documentation found in cases reviewed due to no reasonable accommodation requests
Method of documenting client's reasonable accommodation	No documentation found in cases reviewed due to no reasonable accommodation requests

CalWORKs

Item	How item is Documented
Ethnic Origin	CalWIN Case Summary
Method of identifying client's primary language	Form YC9, CalWIN Demographics
Method of documenting client's primary language	CalWIN Demographics and Case Comments
Method of providing bilingual services and documentation	CalWIN cases reviewed were inconsistent with the documentation of bilingual services. Several non-English cases were missing documentation identifying who provided interpretive services and in what language.
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	CalWIN Case Comments
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	CalWIN Case Comments
Method of documenting client's disability (physical, mental, or learning)	No documentation found in cases reviewed due to no reasonable accommodation requests
Method of offering a reasonable accommodation to the client with a disability	No documentation found in cases reviewed due to no reasonable accommodation requests
Method of documenting client's reasonable accommodation	No documentation found in cases reviewed due to no reasonable accommodation requests

Fraud

Item	How item is Documented
Ethnic Origin	CalWIN Demographics
Method of identifying client's primary language	Form YC9, CalWIN Demographics

Item	How item is Documented
Method of documenting client's primary language	CalWIN Demographics and Case Comments
Method of providing bilingual services and documentation	CalWIN cases reviewed were inconsistent with the documentation of bilingual services. Several non-English cases were missing documentation identifying who provided interpretive services and in what language.
Client provided own interpreter	No interpretive services documentation found in cases reviewed because investigators identified as certified bilingual staff
Method to inform client of potential problem using own interpreter	No interpretive services documentation found in cases reviewed because investigators identified as certified bilingual staff
Release of information to interpreter	No interpretive services documentation found in cases reviewed because investigators identified as certified bilingual staff
Individuals acceptance or refusal of written material offered in primary language	CalWIN Case Comments
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	Not applicable; clients did not have disabilities.
Method of documenting client's disability (physical, mental, or learning)	Not applicable; clients did not have disabilities.
Method of offering a reasonable accommodation to the client with a disability	No documentation found in cases reviewed due to no reasonable accommodation requests
Method of documenting client's reasonable accommodation	No documentation found in cases reviewed due to no reasonable accommodation requests

Children's Services

Item	How item is Documented
Ethnic Origin	Child Welfare Services-Case Management System (CWS-CMS) ID Page, Emergency Response Referral Information (IN-ERREFR) Form

Item	How item is Documented
Method of identifying client's primary language	CWS-CMS Case Transfer Summary Page, IN-ERREFR, Emergency Response Checklist
Method of documenting client's primary language	CWS-CMS ID Page
Method of providing bilingual services and documentation	CWS-CMS cases reviewed were inconsistent with the documentation of bilingual services
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
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	None found in cases reviewed due to minors not being allowed to interpret
Documentation of circumstance for using minor interpreter temporarily	None found in cases reviewed due to minors not being allowed to interpret
Method of identifying client's disability	CWS-CMS Case Narrative
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	No documentation found in case reviewed due to no reasonable accommodation requests
Method of documenting client's reasonable accommodation	No documentation found in case reviewed due to no reasonable accommodation requests

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, All County Letter (ACL) 08-65
General	Yolo County must ensure that proper and consistent documentation is kept in the file that identifies all the required elements to ensure 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).

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights, cultural awareness, Section 504 of the Rehabilitation Act of 1973 (Section 504), and ADA training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview Questions: (Please answer yes/no and provide response with comments)	Comments
Are employees trained in the requirement of Section 504 and ADA?	Yes. The requirements of Section 504 and ADA are included in the County's Division 21 Civil Rights Training.
Do employees receive continued Division 21 Training?	Yes. Division 21 training is offered annually and provided by the Staff Development Unit.
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 the discrimination complaint process and will contact Jessica Morrish, Civil Rights Coordinator.
Does the County provide employees Cultural Awareness Training?	Yes. The Reviewer notes that 6 of the 14 staff interviewed stated they were not sure or did not remember if they received cultural awareness training.
Do the Children Services Workers (CSW) have an understanding of Multi-Ethnic Placement Act (MEPA)?	Yes. The CSWs interviewed stated they understand and have received MEPA training.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	Yes.
Does the County provide training on how to identify clients with disabilities (physical, mental and learning)?	No. Eight (8) of the 14 staff interviewed could not recall receiving training on how to identify clients with disabilities.
Do employees receive training on reasonable accommodation for clients with disabilities?	No. Seven (7) of the 14 staff interviewed could not recall receiving training on reasonable accommodation for clients with disabilities.

Interview Questions: (Please answer yes/no and provide response with comments)	Comments
Do the employees understand the County policy regarding a client's right to a reasonable accommodation?	The County does not have a reasonable accommodation policy.

B. Corrective Actions

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

Interview and Review Areas: (Please answer yes/no and provide response with comments)	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	Yes. Staff interviewed were able to identify the differences between all three complaints.
Do the employees know who the Civil Rights Coordinator is?	Yes. All staff interviewed identified Jessica Morrish 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 were aware of the posters available, which are located in the lobby.

Interview and Review Areas: (Please answer yes/no and provide response with comments)	Findings
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 are provided in a nondiscriminatory manner toward non-English speaking clients and clients with a disability (physical, mental, or learning).

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

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County have a Call Center/Service Center?	Yes, Yolo County operates a Customer Call Center (Call Center).
Is the Call Center/Service Center Publicly accessible to clients?	No.
Does the Call Center/Service Center answer calls for the entire County, by district, or regional office?	The Call Center answers calls for the entire county.
Does the Call/Service Center have an Interactive Voice Response system?	Yes.

Question: (Please answer yes/no and provide response with comments)	Comments
If so, does the Interactive Voice Response system have language options for all County threshold languages?	Yes.
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?	No.
Does the Call/Service Center staff provide services to client's individual case?	Yes. All Call Center staff interviewed stated they have direct access to client case files.
Does the Call/Service Center staff identify and document the client's preferred language?	Yes. All Call Center 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 CCWRO and LSNC. 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 V. Services to Non-English-Speaking, Limited-English-Proficient and Disabled Applicants/Recipients:
 - Provide Yolo County HSA policies and procedures to identify a client's disability (physical or mental) and how to provide a reasonable accommodation as specified in ALC 19-45 and Division 21, Section 115.
 - Provide Yolo County HSA 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.
2. Section VI. Documentation of Applicants'/Recipients' Case Records:
 - Provide Yolo County HSA policies and procedures for documentation in applicants'/recipients' case files as specified in Division 21, Section 116.

Please submit these items with your CAP for this Review.

XIII. CONCLUSION

The CDSS Reviewer found the Yolo County Health & Human Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Jessica Morrish, Civil Rights Coordinator, for organizing the details of the review. In each office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS Reviewer found the Yolo County Health & Human 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 Yolo County Health & Human Services Agency must remedy the deficiencies identified in this report by taking corrective actions. A CAP must be received by CDSS within 60 days of the date of the cover letter to this report. The CAP 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.