



CDSS

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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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ARNOLD SCHWARZENEGGER
GOVERNOR

October 20, 2009

Doug Nowka, Director
El Dorado County Department of Human Services
3057 Briw Road, Suite A
Placerville, CA 95667

Dear Mr Nowka:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of August – October 2008. Enclosed is the final report on the review. We apologize for the delay.

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 sixty 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 attached report.

We will provide a copy of our report to any individual who makes a Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it too, becomes a public document. Per the Governor's Executive Order S-08-09, all compliance reviews (and corresponding CAPs) performed after January 2008 will be posted on the state's Reporting Government Transparency website.

If you need technical assistance in the development of your CAP, please feel free to contact the Civil Rights Bureau at (916) 654-2107 (voice) or (916) 654-2098 (TTY). You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

RAMÓN S. LOPEZ, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Debbie Stack, Civil Rights Coordinator

Chris Webb-Curtis, Branch Chief, CDSS Supplemental Nutrition Assistance Program
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Mike Papin, CDSS Supplemental Nutrition Assistance Program
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Richard Trujillo, CDSS Supplemental Nutrition Assistance Program
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
El Dorado County Department of Human Services
Conducted August & October, 2008**

**California Department of Social Services
Human Rights and Community Services Division
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Reviewers

**Susan Wright
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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the El Dorado County Department of Human Services 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 October 27 -30, 2008 with an exit interview held on October 30, 2008 with various managers to review the initial 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)
Placerville District Office	3057 Briw Road Placerville, CA	CalWORKs, Non-Assistance Food Stamps, Employment Services(WTW) & Children's Services	Spanish for CalWORKS & Non-Assistance Food Stamps
Placerville Adult Services Office	3047 Briw Road Placerville, CA	Adult Services (IHSS & APS)	None
South Lake Tahoe District Office	981 Silver Dollar South Lake Tahoe, CA	Employment Services (WTW), Adult Services (IHSS & APS) & Children's Services	Spanish for CalWORKS
South Lake Tahoe District Office	971 Silver Dollar South Lake Tahoe, CA	CalWORKs & Non-Assistance Food Stamps	None

II. SUMMARY OF METHODOLOGY

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

- Reviewed the Annual Civil Rights Plan for April 1, 2008 through March 31, 2009, 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.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

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

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- 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
CalWorks Elig. Workers	4	2
Children Social Workers	3	1
Adult Program Workers	5	2
Employment Services Workers	1	0
Receptionist/Screeners	3	3
Total	16	8

One scheduled CalWorks interview was a no-show

Program Manager Surveys

Number of surveys distributed	1
Number of surveys received	1

Reviewed Case Files

English speakers' case files reviewed	10
Non-English or limited-English speakers' case files reviewed	38
Languages of clients' cases	Romanian, Russian, Spanish, Tagalog

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX 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	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			
Does the county have extended hours to accommodate clients?	X			On a case-by-case basis.
Can applicants access services when they cannot go to the office?	X			Home visits arranged if required.
Does the county ensure the awareness of available services for individuals in remote areas?	X			County shares information with local community

				organizations, and out-stationed EW's at local hospitals.
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Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)?		X		One Adult Services worker indicated that she did not use the PUB 13; another indicated using the PUB 13 only if the case went to case plan.
Is the pamphlet distributed and explained to each client at intake and re-certification?		X		
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?	X			
Was the Pub 13 available in large print, audiocassette and Braille?	X			
Were the current versions of the required posters present in the lobbies?	X			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?		X		Of 16 interviewed workers who responded to this question, 14 knew of the poster, but 2 APS workers did not know of its existence or location.
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?	X			

B. Corrective Actions

Informational Element	Corrective Action Required
Distribution of CDSS' Pub 13	<p>El Dorado County shall ensure that the Pub 13 pamphlet, "Your Rights Under California Welfare Programs" is both given and explained to program participants in all of the programs for which CDSS has oversight responsibility.</p> <p>Div. 21-107.221: Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all CWD waiting rooms and reception areas and <i>shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility</i>. The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (e.g., cassette tapes, large print, etc.).</p>
Directional signage	<p>El Dorado County shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and that where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages.</p> <p>Div. 21-107.212 and .24</p>

C. Recommendations

El Dorado County should ensure that all public contact workers know the location and appearance of the lobby poster (Pub 86 --"Everyone is Different, but Equal Under the Law"--03/07) which includes the name and address of the county's Civil Rights Coordinator, and are able to direct clients to it when necessary. This can be accomplished through training, regular unit meeting reminders, reminder emails or memos, etc.

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.

A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 3057 Briw Road, Placerville, CA

Facility Element	Findings	Corrective Action
Parking	Parking slots 1, 5 and 6 need the words "No Parking" painted in access aisles.	The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p 135
Exterior entrance	As you enter the building, the outside double doors required 14 to 16 lbs of force to open; the inside double doors required 10	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 195

	to 14 lbs of force to open.	
Unisex Restroom	Unisex restroom was not accessible. Workaround directed clients to "Use employee restroom" in English. (Before reviewer's departure, staff had posted a sign in Spanish: "Please see receptionist for accessible handicapped restrooms.")	Div 21.107-212: 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.

Facility Location: 3047 Briw Road, Placerville, CA

Facility Element	Findings	Corrective Action
Parking	Accessible spaces are too short at 16 feet long.	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135
Parking	Access aisle for van accessible space is too narrow at 91" wide,	Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p 135
Exterior entrance	International Symbol of Accessibility (ISA) sign needed at main entrance. (County had placed a temporary one there before consultant departure. Permanent sign needed)	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp 183, 353 Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background,

		either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p 355
Exterior entrance	Left main door (from the outside) requires 9 lbs of force to open. Right main door requires 10 lbs of force to open.	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 195

Facility Location: 981 Silver Dollar, South Lake Tahoe, CA

Facility Element	Findings	Corrective Action
Parking	Right side line of accessible space is short at about 16 feet in length.	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p 135
Entrance Door	Force to open door is excessive at 8 lbs. Door closure speed is too fast at 2 seconds.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 195 Door Closer (if present) must be set so it takes at least 3 seconds to close from an open position of 70 degrees to a point 3" from the latch. (CA T24 1133B.2.5.1, ADA 4.13.10) p 199
Elevator	Elevator is not marked as accessible with an ISA.	Entrances that are accessible to and usable by persons with disabilities are identified with at least 1 International Symbol of Accessibility. Additional directional signs using the

		symbol are visible along approaching pedestrian ways. (CA T24 1117.B.5.8.1.2) p 229
Unisex Restroom (closest to elevator)	No accessible signage on the wall next to the door.	<p>[Accessible] door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 263</p>
Unisex Restroom (closest to elevator)	Force to open door is excessive at 12 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 195
Unisex Restroom (furthest from elevator)	No accessible signage on the wall next to the door.	<p>[Accessible] door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 263</p>

		Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 263
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Facility Location: 971 Silver Dollar, South Lake Tahoe, CA

Facility Element	Findings	Corrective Action
Parking	Height of van accessible sign is too low at 57" from top of finish grade.	Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p 133
Parking	Accessible sign height for the accessible space next to the van accessible space is too low at 55".	Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p 133
Exterior entrance	As you enter exterior entrance double doors, left door requires 15 lbs of force to open, and the right door requires 14 lbs. of force to open	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 195
Exterior entrance	As you enter exterior entrance double doors, the right door closes too quickly in 2 seconds. The left door is ok.	Door Closer (if present) must be set so it takes at least 3 seconds to close from an open position of 70 degrees to a point 3" from the latch. (CA T24 1133B.2.5.1, ADA 4.13.10) p 199
Men's restroom	Accessible wall sign is missing.	[Accessible] door sign and wall sign shall be 60" above the floor. For permanent identification,

		<p>the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 263</p>
Men's restroom	Door requires 10 lbs of force to open.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 195
Men's restroom	Heights of soap dispenser and shelf are too high at 50".	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p 269
Women's restroom	Accessible wall sign is missing.	<p>[Accessible] door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 263</p>

		Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 263
Women's restroom	Door requires 10 lbs of force to open.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 195
Women's restroom	Soap dispenser is located 42" above the floor, and the shelf is too high at 50", and the waste receptacle is too high at 44".	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p 269

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 they 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 interpreters or other means.

Counties must also provide auxiliary aids and services, including Braille material, audio 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, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, 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	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			Some staff use the "I speak" cards, or equivalent; verbal assessment; Use of the county's primary language form.
Does the county use a primary language form?	X			Form EL43. Several interviewees say the form is attached to the application. However, APS workers indicated that the EL43 is not used in their cases.
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Through bilingual workers and contracted telephone interpreters.
Is there a delay in providing services?		X		Usually not, except for more rare difficult languages.
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			The county has a telephone interpretive service, as well as certified bilingual employees.
Are county interpreters determined to be	X			The county uses Merit-certified bilingual staff as interpreters.

Question	Yes	No	Some-times	Comments
competent?				County certified bilingual staff may be used on a limited basis. Non-certified bilingual staff may be used only to let the client know that qualified assistance in their preferred language is being sought.
Does the county have adequate interpreter services?	X			The program manger survey indicates that they have recently seen some improvements, but that additional bilingual workers would be helpful. Workers indicated though the interviews that there were no delays in getting interpretive services, and that they felt that the language services available meet the needs of their LEP clients.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		
Does the county allow the client to provide his or her own interpreter?	X			A number of workers interviewed (but not all) indicated that they would get a signed release from the client. However, in the case reviews, when the client provided the interpreter, no documentation of a release could be found, and no documentation of the required warnings of ineffective communication could be found.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?		X		

Question	Yes	No	Some-times	Comments
Does the county use the CDSS-translated forms in the clients' primary languages?	X			
Is the information that is to be inserted into NOA translated into the client's primary language?	X			NOA's seen in the sampled case files that had inserts were translated into the language of the NOA.
Does the county provide auxiliary aids and services, TDDs 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)?	X			County indicated that some documents, such as the PUB 13 are provided in Braille, large print and audio formats. Large button phones, TTD phones and volume control phones are also provided. Computer magnification and screen reader software with a headset are also available. Mouse activated on screen keyboard is also available. Lowered counter heights for clients in wheelchairs are also provided.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			
Does the county offer screening for learning disabilities?	X			
Is there an established process for offering screening?	X			
Is the client identified as having a learning disability referred for evaluation?	X			

B. Corrective Actions

Area of Findings	Corrective Actions
Use of client provided interpreter.	<p>El Dorado County must ensure that when a client provided interpreter is used, the worker must provide the client a warning of the potential problems of ineffective communication. In the event the client decides to use his/her own interpreter, the worker must obtain a signed consent for the release of information and shall so document it.</p> <p>Div. 21-116.23 When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed.</p> <p>Div. 21-116.24 Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented.</p>

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

For each documentation item, the location and/or form where the item is documented in the case file is noted. Instances where the case review sample did not contain evidence of the documented item, the information is based on worker interviews.

Documented Item	Children's Services	Adult Programs	CalWORKs/WTW	Non-Assisted Food Stamps
Ethnic origin documentation	4 cases, no documentation; Emergency Response Form; SAWS 1	SOC 295; SAWS 1; MediCal Form	SAWS 1; EL43/AD	SAWS 1; EL43/AD
Primary language documentation	Assessment Form; Emergency Response Form	SOC 295; SAWS 1; 2 cases lacked language documentation	SAWS 1; EL43/AD	EL43/AD.
Method of providing bilingual services and documentation	If documentation were provided, it would be in case comments, according to interviews and manager survey. Three non-English cases reviewed contained such documentation in case comments.	If documentation were provided, it would be in case comments, according to interviews and manager survey. 5 non-English IHSS cases contained documentation in case comments indicating how bilingual services were provided.	If documentation were provided, it would be in case comments, according to interviews and manager survey. Note: Documentation was consistently good, with either the use of an abbreviation indicating interpretive services (INT/BIL/SP, for example, indicating Spanish bilingual interpreted conversation), or a case comment to the effect of: "Interview conducted in Spanish".	If documentation were provided, it would be in case comments, according to interviews and manager survey. Note: Documentation was usually good, with either the use of an abbreviation indicating interpretive services (INT/BIL/SP, for example, indicating Spanish bilingual interpreted conversation), or a case comment to the effect of:

Documented Item	Children's Services	Adult Programs	CalWORKs/WTW	Non-Assisted Food Stamps
				"Interview conducted in Spanish". There were 4 cases at Briw Road that did not have language documentation in case comments.
Client provided own interpreter	Case comments, but none in sample reviewed.	Case comments; 4 cases indicated client provided interpreter, but comments did not document warnings or consent form as required.	Case comments; One case mentions 2 daughters helped translate; no other comments.	Case comments, but none in sample reviewed.
Method to inform client of potential problem using own interpreter	Case comments; No documentation of this found in sample cases reviewed.	Case comments; No documentation of this found in sample cases reviewed	Case comments; No documentation of this found in sample cases reviewed.	Case comments; No documentation of this found in sample cases reviewed.
Release of information to Interpreter	Case comments; No documentation found in sample cases reviewed.	Case comments; No documentation of this found in sample cases reviewed	Case comments; No documentation of this found in sample cases reviewed.	Case comments; No documentation of this fou in sample cases reviewed nd.
Individual's acceptance or refusal of written material offered in primary language	Case comments, but none in sample reviewed.	Case comments, but none in sample reviewed.	Case comments, but none in sample reviewed.	Case comments, but none in sample reviewed.

Documented Item	Children's Services	Adult Programs	CalWORKs/WTW	Non-Assisted Food Stamps
Documentation of minor used as interpreter	Case comments, but none in sample reviewed.	Case comments, but none in sample reviewed.	Case comments, but none in sample reviewed.	Case comments, but none in sample reviewed.
Documentation of circumstances for using minor interpreter temporarily	Case comments, but none in sample reviewed.	Case comments, but none in sample reviewed.	Case comments, but none in sample reviewed..	Case comments, but none in sample reviewed.
Translated notice of actions (NOA) contain translated inserts	Inserts were translated.	Reviewer was unable to determine this in four IHSS cases	Inserts were translated.	Inserts were translated.
Method of identifying client's disability	Case comments, but none in sample reviewed.	Case comments; or SOC 293; or MediCal Form.	Case comments or Statement Of Facts, or SAWS 1 but none in sample reviewed.	Case comments or Statement Of Facts or SAWS 1, but none in sample reviewed.
Method of documenting a client's request for auxiliary aids and services	Case comments, but none in sample reviewed.	Case comments, but none in sample reviewed.	Case comments, but none in sample reviewed.	Case comments, but none in sample reviewed.

B. Corrective Actions

Areas of Action	Corrective Action
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients

Areas of Action	Corrective Action
	were so informed. Div. 21-116.23
Documentation of client provided interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22
General	El Dorado County must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness 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	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			Civil Rights training is part of the new hire packet. Training is offered annually through the UC Davis program, and an internal refresher course is given in unit meetings to public

				contact staff.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural Awareness Training?	X			Training provided by UC Davis.
Do the CSWs have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions

No corrective actions required for these findings.

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 the Civil Rights Coordinator's responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a	X			

Interview and review areas	Yes	No	Some-times	Findings
personnel complaint?				
Did the employees know who the Civil Rights Coordinator is?	X			All employees interviewed knew the name of the Civil Rights Coordinator.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?		X		Of 16 interviewed workers who responded to this question, 14 knew of the poster, but 2 APS workers did not know of it's existence or location.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Corrective Action

Element	Corrective Action
Civil Rights Coordinator	El Dorado County shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Div. 21-117 and 21-107.21

X. CONCLUSION

The CDSS reviewer found the El Dorado County Department of Human Services staff warm, welcoming, informative and very supportive. Particular thanks to Debbie Stack, Civil Rights Coordinator, and Jasara Bento, Staff Services Manager, for organizing the details of the review. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance deficiencies and to provide the county with an opportunity to implement corrective action to achieve full compliance with Division 21 regulations. Civil Rights staff is available to provide technical

assistance as requested.

El Dorado County Department of Human Services was found to be in substantial compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

The CDSS commends El Dorado County for providing services with sensitivity and responsiveness to the culturally-diverse population served. However, El Dorado County must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the deficiencies.