



CDSS

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

July 28, 2009

Ted Myers, Director  
Ventura County Human Services Agency  
855 Partridge Drive  
Ventura, CA 93003

Dear Mr. Myers:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of September 23, 2008. Enclosed is the final report.

There were some compliance issues identified in the report, which will require the development of a corrective action plan. Please submit your plan 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 request since our report is a public document. If you would like us to include a copy of your corrective action plan when responding to these requests, please indicate this when submitting your plan.

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

Sincerely,

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

Enclosure

c: Don Aguirre, Civil Rights Coordinator

Chris Webb-Curtis, Branch Chief, CDSS Supplemental Nutrition Assistance  
Program, M.S. 8-9-32

Mike Papin, CDSS Supplemental Nutrition Assistance Program  
Food Stamps Policy Bureau M.S. 8-9-32

Yvonne Lee, CDSS Supplemental Nutrition Assistance Program  
Food Stamps Policy Bureau M.S. 8-9-32

Richard Trujillo, CDSS Supplemental Nutrition Assistance Program  
Food Stamps Policy Bureau M.S. 8-9-32

Paul Gardes, CDSS Supplemental Nutrition Assistance Program  
Food Stamps Policy Bureau M.S. 8-9-32

Thuan Nguyen, Refugee Programs Bureau, M.S. 8-8-46

Joe Torres, Office of Civil Rights  
USDA Food and Nutrition Services  
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Supplemental Nutrition Assistance Program (SNAP)  
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR  
VENTURA COUNTY HUMAN SERVICES AGENCY  
  
Conducted September 23 – September 25, 2009**

**California Department of Social Services  
Human Rights and Community Services Division  
  
Civil Rights Bureau  
744 P Street, M.S. 6-70  
Sacramento, CA 95814  
  
(916) 654-2107**

**Reviewer**

**Cindy S. Guzman**

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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 Ventura County Health and 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 September 23, 2008 – September 25, 2008 with Civil Rights Coordinator Don Aguirre. An exit interview was held on September 25, 2008 to review the findings.

The review was conducted in the following locations:

<b>Name of Facility</b>	<b>Address</b>	<b>Programs</b>	<b>Non-English languages spoken by a substantial number of clients (5% or more)</b>
Ventura Intake & Eligibility Center	4651 Telephone Road, Suite 100, Ventura, CA	N/A Food Stamps	Spanish
Ventura Adult & Family Services	4651 Telephone Road, Suite 201, Ventura, CA	IHSS	Spanish
Ventura Children & Family Services	4245 Market Street, Suite 204, Ventura, CA	Children & Family Services	Spanish
Santa Clara Valley Intake & Eligibility Center/Job Career Center	725 Easy Main Street, Suite 301, Santa Paula, CA	CalWORKS Food Stamps	Spanish

### **II. SUMMARY OF METHODOLOGY**

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

- Reviewed the 2007 Annual Civil Rights 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.

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

<b>Classifications</b>	<b>Total</b>	<b>Bilingual</b>
Eligibility Workers	6	4
Children Social Workers	2	1
Adult Program Workers	2	1
Receptionist/Screeners	3	1
<b>Total</b>	<b>13</b>	<b>7</b>

#### 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	42
Languages of clients' cases reviewed	English and Spanish

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 team 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**

<b>Access to Services, Information and Outreach</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			County has many workers with flexible schedules who are available until 6:00 P.M. Mail- in applications are accepted. Home visits are available when there is hardship. Children and Family Services is a mandated 24/7 operation. The hotline operates 24 hours a day, 7 days a week. Adult Family Services has 24 hour application phone lines.
Does the county have extended hours to accommodate clients?	X			Several workers have flexible hours until 6:00 P.M.

Can applicants access services when they cannot go to the office?	X			There is an outside drop off box for applications. Home visits are available when there is hardship.
Does the county ensure the awareness of available services for individuals in remote areas?	X			The county ensures the awareness of available services for individuals in remote areas through county website, Outreach events in the community.

In Signage, posters, pamphlets	Yes	No	Sometimes	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)? Is the pamphlet distributed and explained to each client at intake and re-certification?	X			The pamphlets are distributed and discussed at intake and annual review and are also on display in lobby/reception areas.
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			The county had Pub 13 available in large print, audio cassette and Braille at each facility.
Were the current versions of the required posters present in the lobbies?	X			All posters were current.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			County staff knows the location of the required posters are in the main lobby.



In Signage, posters, pamphlets	Yes	No	Sometimes	Comments
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			Translated instructional and informational materials were available in the locations reviewed.

**B. Corrective Actions/None**

**C. Recommendation**

The most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	03/07
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact your program consultant to receive the most recent versions, or download the Pub 13 from the CRB website

[http://www.dss.cahwnet.gov/civilrights/YourRights\\_498.htm](http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm).

**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:** 4651 Telephone Road, Suite 100 (Telephone Road – Main East Entrance)

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Parking	There were no negative findings on parking at the Telephone Road facility.	None Needed.
Exterior entrance	No ISA (International Symbol of accessibility) at Main Entrance.	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
Outside signage	ISA needed at Main Entrance.	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
	Force to open Main Entrance doors and Lobby doors exceeds 5 lbs. at 9 lbs.	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

Client lobby	Posters: Everyone is Difference, but Equal under the Law has no contact information listed on poster near right wall near entrance.	Current: 12/99 3/07, with current CRC information (Div 21-107.211)
Men's Restroom	Force to open Men's Restroom door exceeds 5 lbs. at 9 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
Women's Restroom	Force to open Women's Restroom door exceeds 5 lbs. at 9 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195

**Facility Location:** 4651 Telephone Road, Suite 201 (Second Floor)

Facility Element	Findings	Corrective Action
Parking	(See Parking for Suite 100) Shared parking	None Needed
Exterior entrance	No ISA (International Symbol of accessibility) at Lobby Entrance.	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
Outside signage	ISA needed at Lobby Entrance.  Force to open Lobby Entrance doors exceeds 5 lbs. at 14 lbs.	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  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

Telephone	Public Pay Telephone on second floor did not have volume control.	If there is one or more single units, one or at least 50% of telephone unit(s) per floor must be accessible. (CA T24 1117B.2.1, ADA 4.1.3(17)(a)) p. 251
Elevator	No ISA (International Symbol of accessibility) at Elevator Entrance.	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
Women Restroom	Posted "Employee Restroom Only" in Threshold Languages	None Needed
Men's Restroom	Posted "Employee Restroom Only" in Threshold Languages	None Needed

**Facility Location:** 4245 Market Street – Children's Services

Facility Element	Findings	Corrective Action
Parking	No negative findings – Shared parking	None Needed
Exterior entrance	No ISA (International Symbol of accessibility) at Entrance.	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

Outside signage	<p>ISA needed at Entrance.</p> <p>Force to open Entrance doors exceeds 5 lbs. at 15 lbs.</p>	<p>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</p> <p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p. 195</p>
Unisex Restroom	<p>No ISA Signage on the door, and on the wall, adjacent to the latch side of the door.</p> <p>Accessible urinal too high at 19".</p>	<p>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> <p>Rim height shall be a maximum of 17" in height above the floor. (CA T24 1115B.2.1.1.1, ADA 4.18.2) p. 265</p>

	Pipes under sink not securely insulated.	Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p. 267
	Toilet Protector too high at 59"	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 T24 1115B.9.2 and CA T24 1115B.9.1.2, ADA 4.19.6) p. 269
	Paper Towel dispenser high at 56".	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 T24 1115B.9.2 and CA T24 1115B.9.1.2, ADA 4.19.6) p. 269

**Facility Location:** 725 East Main, Santa Paula (3 Story Building) No lobby on second floor.

Facility Element	Findings	Corrective Action
Parking	There were 4 spaces designated for disabled parking, however 2 spaces on the right had freestanding signs at 70"high.	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 Wall signage shall be centered 36" minimum above grade, ground, or sidewalk at the interior end of space. (CA T24 1129B.5) p. 133
	Van accessible space was 5' wide.	Length of parking space shall be at least 18' long, 9' wide.

	<p>Clearance access aisle on passenger side of van space was too narrow at 60".</p> <p>Access aisles have no "No Parking" painted on pavement in access aisles (letters min. 12" high)</p>	<p>(CA T24 1129B.4.1) p 135 Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p. 135</p> <p>One in every 8 accessible spaces (p 136) and no less than 1 shall be served by an access aisle 96" wide minimum placed opposite the driver's side and shall be designated Van-Accessible (CA T24 1129.B.4.2, ADA 4.1.2(5)(b)) p. 135</p> <p>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 &amp; 2) p. 135</p>
Exterior entrance	No ISA (International Symbol of accessibility) at Main Entrance.	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
Outside signage	ISA needed at Entrance.	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

Elevator	No ISA (International Symbol of accessibility) at Elevator Entrance.	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
Men's Restroom	<p>First Floor: Force to open Entrance doors exceeds 5 lbs. at 17 lbs.</p> <p>Second Floor: Force to open Entrance doors exceeds 5 lbs. at 17 lbs.</p> <p>Third Floor: Force to open Entrance doors exceeds 5 lbs. at 17 lbs.</p> <p>Second Floor: Accessible urinal too high at 26".</p> <p>Third Floor: Accessible urinal too high at 25".</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p. 195</p> <p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p. 195</p> <p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p. 195</p> <p>Rim height shall be a maximum of 17" in height above the floor. (CA T24 1115B.2.1.1.1, ADA 4.18.2) p. 265</p> <p>Rim height shall be a maximum of 17" in height above the floor. (CA T24 1115B.2.1.1.1, ADA 4.18.2) p. 265</p>



	Third Floor: Toilet Protector too high at 47".	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 T24 1115B.9.2 and CA T24 1115B.9.1.2, ADA 4.19.6) p. 269
Women's Restroom	First Floor: No Accessible sign on wall adjacent to latch outside of door.	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  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
	Third Floor: No Accessible sign on wall adjacent to latch outside of door.	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  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

	First Floor: Force to open Entrance doors exceeds 5 lbs. at 17 lbs.	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
	Second Floor: Force to open Entrance doors exceeds 5 lbs. at 17 lbs	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
	Third Floor: Force to open Entrance doors exceeds 5 lbs. at 17 lbs	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
	First Floor: Paper Towel dispenser too high at 47".	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 T24 1115B.9.2 and CA T24 1115B.9.1.2, ADA 4.19.6) p. 269
	Third Floor: Toilet Protector too high at 49".	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 T24 1115B.9.2 and CA T24 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 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 (TDD's), 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**

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county identify a client's language need upon first contact? How?	X			Each facility utilizes the "I Speak" cards or they ask the clients what language they need or prefer.
Does the county use a primary language form?	X			Primary Language Form is in use to identify the client preferences for both spoken and written communication.
Does the client self-declare on this form?	X			Staff indicates that clients self declare on this form.

Question	Yes	No	Some-times	Comments
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Clients are assigned to a bilingual worker. Staff provides interpreter service to their own caseload and assist co-workers as needed. They also use the 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?	X			Clients are assigned to bilingual workers. In some cases, workers help outside their caseload as needed.
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			The county uses the CyraCom phone system language line which can be used to interpret other languages. The county also has assigned Bilingual Spanish/English workers.
Are county interpreters determined to be competent?	X			
Does the county have adequate interpreter services?	X			Clients are assigned to a bilingual worker. Staff provides interpreter service to their own caseload and assist co-workers as needed. They also use the language line.
Does the county allow minors to be interpreters? If so, under what circumstances?	X			County allows minors to be interpreters only temporarily under extenuating circumstances.
Does the county allow the client to provide his or her own interpreter?	X			The county does allow the client to provide his or her own interpreter if they prefer.

Question	Yes	No	Some-times	Comments
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			
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			
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)?	X			The county has a language bank process to request an American Sign Language interpreter. The client can also dial the 800 number to utilize the California Relay Service to request necessary information. Workers read and explain documents to the clients if needed. The CalWIN system is an interactive interview process. The clients are asked questions and the worker inputs the information into the system for them.
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			The screening occurs in the Welfare to Work Program.

Question	Yes	No	Some-times	Comments
Is there an established process for offering screening?	X			The screening consists of 12 questions, and occurs in the Welfare to Work Program.

## **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**

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Ethnic origin documentation	ER/Referral	Application Form (Soc 295)	SAWS 1	DFA 285
Primary language documentation	CPS: ER referral form	Application Form (Soc 295)	SAWS 1, CalWIN Screen	DFA 285, CalWIN Screen
Client provided own interpreter	N/A	N/A	N/A	N/A
Method to inform client of potential problem using own interpreter	N/A	Is explained to client	Is explained to client	Is explained to client
Individual's acceptance or refusal of written material offered in primary language	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in sample
Documentation of minor used as interpreter	N/A	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in sample

<b>Documented Item</b>	<b>Children's Services</b>	<b>Adult Programs</b>	<b>CalWORKs</b>	<b>Non-Assisted Food Stamps</b>
Documentation of circumstances for using minor interpreter temporarily	N/A	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in sample
Translated notice of actions (NOA) contain translated inserts	Yes	Yes	Yes	Yes
Method of identifying client's disability	ER/Referral	In Narrative	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in sample
Method of documenting a client's request for auxiliary aids and services	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in sample

## **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**

<b>Interview questions</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Do employees receive continued Division 21 Training?	X			New county staff receives continued Division 21 training. New staff attend the training "Foundations for Success" which includes civil rights training. All staff attends Civil Rights mandatory training every two years.

Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			While conducting the telephone interview with staff, all staff understood the procedure to file a discrimination complaint.
Does the county provide employees Cultural Awareness Training?	X			There is a cultural newsletter and a cultural competency workgroup to develop plans to ensure all staff members are well versed in cultural awareness for their clients and coworkers.
Do the CSW's 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			

### **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 responsibility to maintain this log.

#### **A. Findings from Staff Interviews and Program Manager Surveys**

<b>Interview and review areas</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Findings</b>
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?		X		One county staff did not know the difference between a program discrimination complaint and a personnel complaint.



Interview and review areas	Yes	No	Some-times	Findings
Did the employees know who the Civil Rights Coordinator is?		X		Two county staff did not know who the Civil Rights Coordinator is.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

## B. Corrective Action

Element	Corrective Action
Discrimination Process	Ventura County shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203
Civil Rights Coordinator	Ventura 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

## IX. CONCLUSION

Ventura County Human Services Agency (HSA) 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 professional courtesy and assistance provided to the reviewer by both the Civil Rights Office and the various facility managers was exceptional and facilitated a very successful review.

There was clear evidence of the efforts made by HSA to provide accessible services to the disabled population and to establish a "climate" that was both accommodating and non-threatening.

The Ventura HSA client population has very limited diversity, with the non-English-speaking portion primarily Spanish speaking. The agency does very well in providing language services to this Spanish-speaking population, through both bilingual workers and translated forms and material.

The county must remedy the violations 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 violations. Monitoring visits may be made by staff from the Civil Rights Bureau to track progress in the implementation of the 2006 corrective action plan.

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