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**DEPARTMENT OF SOCIAL SERVICES**  
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ARNOLD SCHWARZENEGGER  
GOVERNOR

March 15, 2010

Leland W. Collins, Director  
San Luis Obispo County Social Services Department  
3433 South Higuera  
San Luis Obispo, CA 92243

Dear Mr. Collins:

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 June 22-26, 2009. 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 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. 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. 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: Debbie Aiello, Civil Rights Coordinator, San Luis Obispo County Social Services  
Department o

Chris Webb-Curtis, Branch Chief, CDSS Supplemental Nutrition Assistance Program  
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Mike Papin, CDSS Supplemental Nutrition Assistance Program  
Food Stamps Policy Bureau M.S. 8-9-32

Richard Trujillo, CDSS Supplemental Nutrition Assistance Program  
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Paul Gardes, CDSS Supplemental Nutrition Assistance Program  
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR SOCIAL SERVICES DEPARTMENT  
COUNTY OF SAN LUIS OBISPO**

**Conducted June 22-26, 2009**

**California Department of Social Services**

**Human Rights and Community Services Division**

**Civil Rights Bureau**

**744 P Street, M.S. 8-16-70**

**Sacramento, CA 95814**

**(916) 654-2107**

**Reviewer**

**James Urquizo**

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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 San Luis Obispo County Social Services Department 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 June 22-26, 2009 with an exit interview held with seven county managers and staff on June 26, 2009, to review the initial 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>
Arroyo Grande	1086 Grand Avenue	CalWorks, Food Stamps, Child Welfare Services, In-Home Support Services	Spanish
Nipomo	681 W. Taft	CalWorks, Food Stamps, Child Welfare Services	Spanish
Paso Robles	530 12 <sup>th</sup> Street	CalWorks, Food Stamps,	Spanish

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

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

- Reviewed the latest 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:

- Limited 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	1	1
Children Social Workers	3	2
Adult Program Workers	3	2
Receptionist/Screeners	3	2
Total	10	7

An additional 11 interviews were scheduled but were not conducted due to unavailability of county staff and CDSS staffing constraints.

#### Program Manager Surveys

Number of surveys distributed	5
Number of surveys received	5

#### Reviewed Case Files

English speakers' case files reviewed	11
Non-English or limited-English speakers' case files reviewed	36
Languages of clients' cases	Spanish (35), ASL (1)
Unidentifiable case language	3

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>Comments</b>
Does the county have a written policy to accommodate clients who cannot go to the office during normal business hours?	X		The County has written instructions on how to address after-hour appointments with clients.
Is the policy followed?	X		Depending on the office, program managers indicate that core hours are either 8 AM to 5 PM, or 7 AM to 7 PM. Managers indicated that appointments can be made as needed outside of those hours, and home visits and telephone meetings are also available.
If the county does not have a written policy, how does the county accommodate clients who cannot go to the office during normal business hours?	N/A		
Can applicants access services when they cannot go to the office?	X		Program managers indicated that home visits can be arranged, and if appropriate, telephone interviews conducted.

Does the county ensure the awareness of available services for individuals in remote areas?	X		Program managers indicate the following methods are used to ensure awareness: Outreach Committees by DSS employees; Community and Partner Agencies, Brochures; Community Events; the "211" phone line, and the internet; and partnering with school districts.
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<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)?	X		Yes, based on conversations with county staff.
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/CD 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		Yes. All staff questioned knew the location of the posters.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated	X		Yes. All signs posted in client-accessible areas were translated into Spanish.



Signage, posters, pamphlets into appropriate languages?	Yes	No	Comments

#### 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:** 1086 Grand, Arroyo Grande

Facility Element	Findings	Corrective Action
Parking	There is no "unauthorized parking" signage at the entrance to off-street accessible parking.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high,

		stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p 133
Parking	Four accessible spaces are too short at 16' long.	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p 135
Parking	One van accessible space has an access aisle that is too narrow at 5' 4" wide.	Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.3.1, ADA 4.6.3) p 135
Parking	Four disabled spaces need to be repainted.	[International Symbol of Accessibility] Pavement signage shall be 36" x 36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.2) p 134  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.3.2) p 135
Exterior entrance	Pressure to open main entrance door exceeds 5 lb. ADA standard. Left door required 12 lbs. of pressure to open. Right door required 13 lbs. of pressure 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 201
Exterior entrance	Door closes in only 2 seconds.	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 205
Emergency Alarms	Emergency alarms are audible only. They are not visual.	If emergency warning systems are required, they shall activate a means of warning the hearing impaired. (CA T24 1114B.2.2, ADA 4.28.1) p 243
Men's Restroom	Towel dispensers are located too high at 43" from floor.	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.8.3, ADA 4.23.7) p 294
Women's Restroom	Towel dispensers are located too high at 43" from floor.	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.8.3, ADA 4.23.7) p 294

**Facility Location:** 530 12<sup>th</sup> Street, Paso Robles

Facility Element	Findings	Corrective Action
Parking	There is no "unauthorized parking" signage at the entrances to off-street accessible parking.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not

		displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p 133
Parking	Signage for disabled spaces needs to be repainted.	[International Symbol of Accessibility] Pavement signage shall be 36" x 36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.2) p 134  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.3.2) p 135
Exterior entrance	Pressure to open main entrance door exceeds 5 lbs. ADA standard. Door pressure is 6 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 201
Emergency Alarms	Emergency alarms are audible only. They are not visual.	If emergency warning systems are required, they shall activate a means of warning the hearing impaired. (CA T24 1114B.2.2, ADA 4.28.1) p 243
Men's Restroom	Towel dispenser is located too high at 43" from floor.	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.8.3, ADA 4.23.7) p 294
Women's Restroom	Towel dispensers are located too high at 43" from floor.	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.8.3, ADA 4.23.7) p 294
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**Facility Location: 681 W. Taft, Nipomo**

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Parking	There is no "unauthorized parking" signage at the entrance to off-street accessible parking.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p 133
Parking	Pavement signage for disabled spaces needs to be repainted.	[International Symbol of Accessibility] Pavement signage shall be 36" x 36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.2) p 134  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.3.2) p 135

Exterior entrance	Force to open main entrance door exceeds 5 lb. ADA standard at 8 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 201
Men's Restroom	Wall sign lacking Braille lettering.	<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 281</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 282</p>
Men's Restroom	Force to open door exceeds ADA standard at 12 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 201
Women's Restroom	Wall sign lacking Braille lettering.	<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 281</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 282
Women's Restroom	Force to open door exceeds 5 lbs.ADA standard at 15 lbs of force.	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 201

## B. Recommendations

530 12<sup>th</sup> Street, Paso Robles: Recommendation: move the designated disabled ramp to a smoother side of the sidewalk.

530 12<sup>th</sup> Street, Paso Robles: Recommendation: move towel dispenser in men's room to front of counter.

530 12<sup>th</sup> Street, Paso Robles: Recommendation: move towel dispenser in women's room to front of counter.

681 Taft, Nipomo: Recommendation: Install bubble mat on concrete sidewalk to slow wheelchair.

## V. FACILITY PHOTOGRAPHS



**COUNTY OF SAN LUIS OBISPO  
1086 GRAND, ARROYO GRANDE**





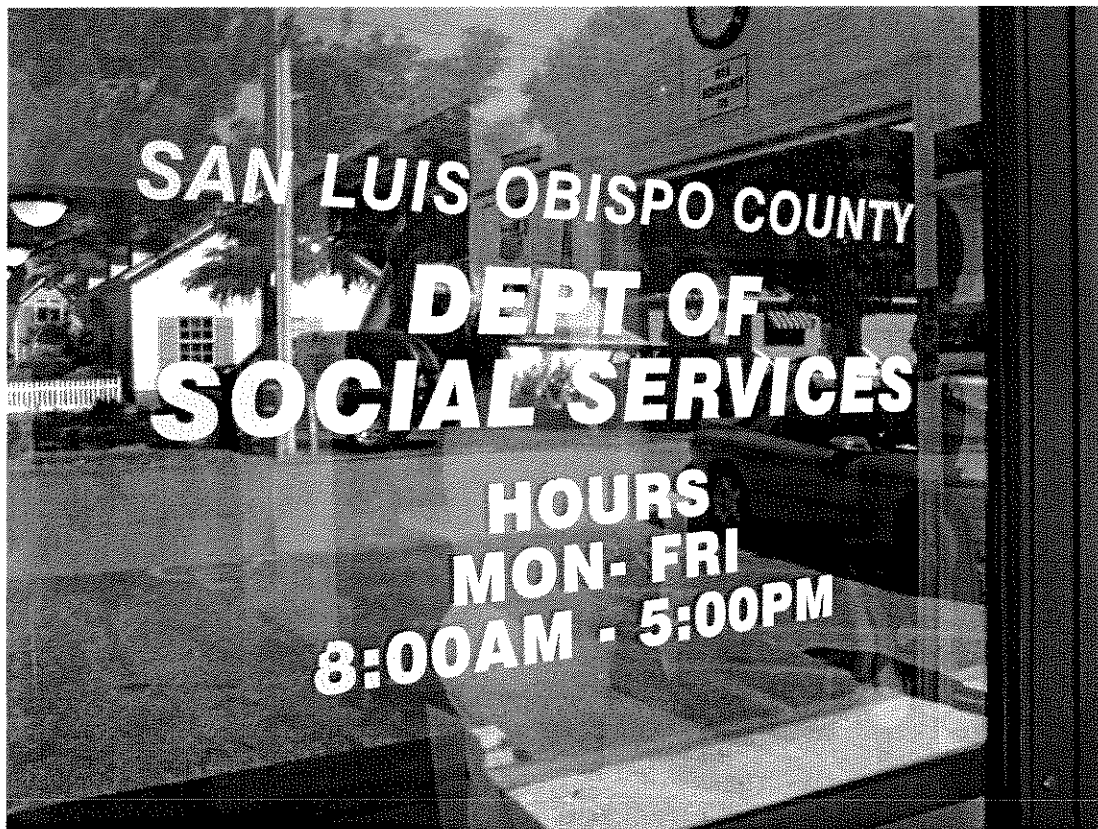
Correct unauthorized parking sign not being used



**Disabled spot needs to be repainted**



**Disabled spot needs to be repainted**



**COUNTY OF SAN LUIS OBISPO  
530 12<sup>th</sup> STREET, PASO ROBLES**



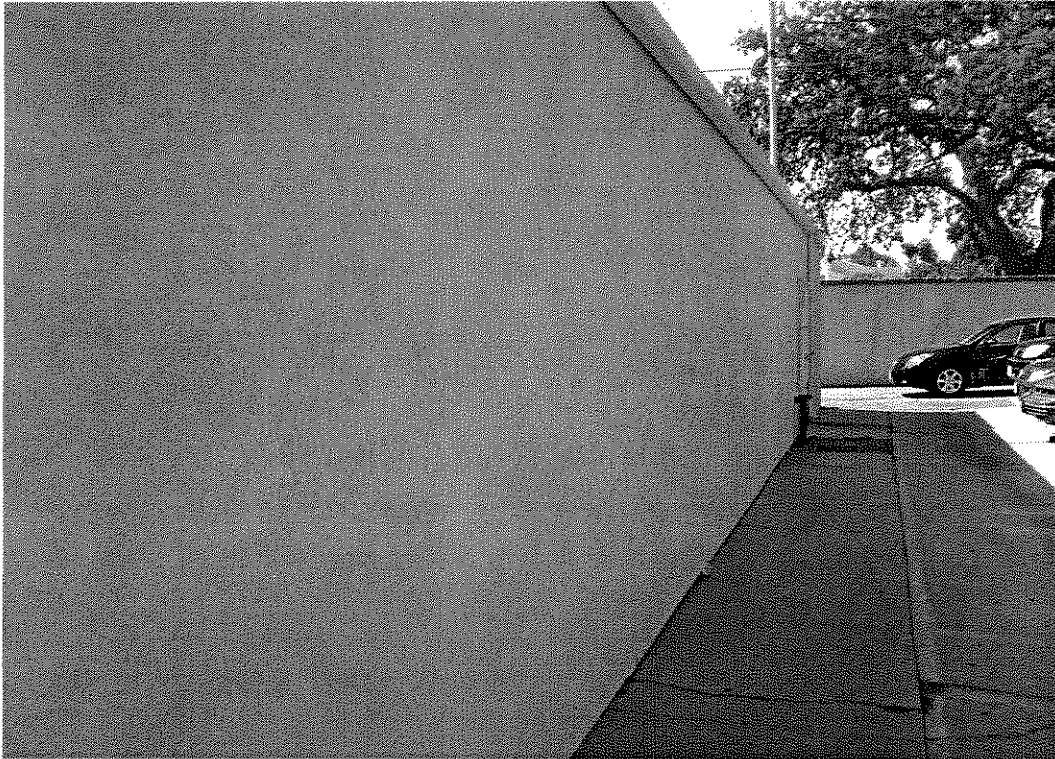




**Disabled spot needs to be repainted**



**Disabled spot needs to be repainted**



**Directional sign to front entrance needed**



**Correct disabled sign to bathroom is needed on door**



**COUNTY OF SAN LUIS OBISPO  
681 WEST TAFT, NIPOMO**



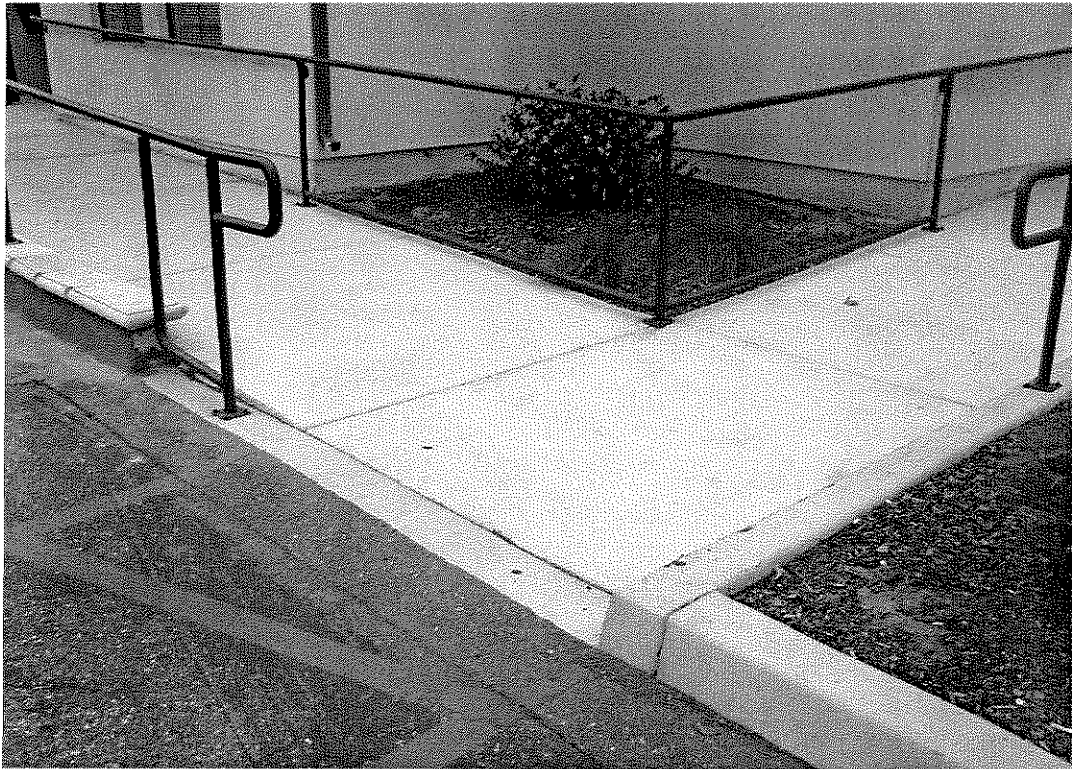




**Disabled spot needs to be repainted**



**Disabled spot needs to be repainted**



**Recommendation:**  
**That a bubble mat be considered at this walkway intersection**



## **VI. 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 Limited English Proficiency (LEP) 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>Comments</b>
Does the county identify a client's language need upon first contact?	X		Yes. The county allows clients to self-certify language needs.
Does the county use a primary language form?	X		County Form DSS 72, Designation of Preferred Language.
Does the client self-declare on this form?	X		
Are LEP clients provided bilingual services?	X		County uses certified bilingual workers, other certified interpreters, and Language Line telephone interpreter services.

Question	Yes	No	Comments
After it has been determined that the client is an LEP client, is there a county process for procuring an interpreter?	X		County's DSS Net has a desk guide that has instructions.
Is there an undo delay in providing services?		X	
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X		Language Line
Are county interpreters determined to be competent?	X		All bilingual workers are certified by County.
Does the county have adequate interpreter services?	X		All five program managers who complete the Program Manager Survey felt that they have a sufficient number of bilingual workers to meet the needs of the client population.
Does the county allow minors to be interpreters?		X	Staff are instructed to not accept minors as interpreters.
Does the county allow the client to provide his or her own interpreter?	X		County does allow, but they insure that staff explain to clients the potential for miscommunication and loss of information.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X		When the client insists on using his/her own interpreter, the County insures a staff interpreter is either present or available to confirm that the client-provided interpreter understands what is being said and can translate accurately.
Does the county use the CDSS-translated forms in the clients' primary languages?	X		

Question	Yes	No	Comments
Is the information that is to be inserted into various forms (i.e. NOAs, letters, case plans, etc.) 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/CDs, large print materials (besides the Pub 13)?	X		The county utilizes TDD, ASL interpreters, California Relay Services, ADA compliant buildings, accessible counters and interview rooms and large print forms.
Does the county identify and assist clients who have learning disabilities or who cannot read or write?	X		Yes, the County identifies and assists clients who have a learning disability. This is accomplished at intake.
Does the county offer screening for learning disabilities?	X		Screening is accomplished at intake and at initial interview.
Is there an established process for offering screening?	X		Yes. Screening is offered at intake. The client is referred to a worker that completes the screening process.
Is the client identified as having a learning disability referred for evaluation?	X		Yes, this is done at the screening stage.
Is there a policy or process in place for accommodating clients with a documented mental illness or who exhibit signs of mental illness?	X		

## VII. 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	In Home Supportive Services	CalWORKs and Food Stamps
Ethnic origin documentation	Six cases did not identify ethnicity. The remainder did, using the SS8572, DSS 273, DSS 72, Police Report, or a Foster Care Document	SOC 295 in all cases	SAWS 1
Primary language documentation	Nine cases did not identify the primary language. The remainder did, using the DSS 72, or the SS8572. However, 15 cases did not use the DSS 72, <i>Designation of Preferred Language</i> .	SOC 295 in all cases.  The DSS 72, <i>Designation of Preferred Language</i> , was not found in any case file.	SAWS 1 and DSS 72, <i>Designation of Preferred Language</i> . DSS 72 used in 8 reviewed cases.
Method of providing bilingual services and documentation	Bilingual Workers. However, 11 cases contained no required narrative or case comments as to the method and identity of bilingual services provider. Eight cases did indicate interactions in Spanish.	Three cases documented provision of bilingual services through bilingual staff, and three did not contain documentation of how interpretive services were provided.	Bilingual workers, however narrative often lacking documentation of this.

<b>Documented Item</b>	<b>Children's Services</b>	<b>In Home Supportive Services</b>	<b>CalWORKs and Food Stamps</b>
Client provided own interpreter	No such cases reviewed.	No such cases reviewed.	No such cases reviewed.
Method to inform client of potential problem using own interpreter	No such cases reviewed.	No such cases reviewed.	No such cases reviewed.
Release of information to Interpreter	No such cases reviewed.	No such cases reviewed.	No such cases reviewed.
Individual's acceptance or refusal of written material offered in primary language	Six cases used the DSS 72, <i>Designation of Preferred Language</i> . The remainder did not indicate acceptance or refusal of written material in the primary language.	No use of the county's form DSS 72, <i>Designation of Preferred Language</i> , indicated. So no indication of client's acceptance or refusal of written material in primary language.	Eight cases used the DSS 72, <i>Designation of Preferred Language</i> . The remainder did not indicate acceptance or refusal of written material in the primary language.
Documentation of minor used as interpreter	No such cases reviewed.	No such cases reviewed.	No such cases reviewed.
Documentation of circumstances for using minor interpreter temporarily	No such cases reviewed.	No such cases reviewed.	No such cases reviewed.
Translated forms (NOA, case plans, letters, etc.) contain translated inserts	Observed in most cases.	Observed in most cases.	Observed in most cases.
Method of identifying client's disability	No such cases reviewed.	DS293A	DSS 345

Documented Item	Children's Services	In Home Supportive Services	CalWORKs and Food Stamps
Method of documenting a client's request for auxiliary aids and services	No such cases reviewed.	DS293A	DSS 345. No documentation of how and who provided ASL interpretive service.

## B. Corrective Actions

Areas of Action	Corrective Action
Documentation of primary language and ethnicity	Each agency shall ensure that case record identification shows the applicant's/recipient's ethnic origin and primary language. Div. 21-201.21
Documentation that bilingual services were provided	San Luis Obispo County must 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; All County Letter 80-65, December 31, 2008
General	San Luis Obispo County must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

## C. Recommendation

San Luis Obispo County should consider using their form **DSS 72, *Designation of Preferred Language***, for all programs to allow clients to self designate on language interpretive issues.

## VIII. 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	Comments
Do employees receive continued Division 21 Training?	X		Training is conducted every 2 years.
Do employees understand the county policy regarding a client's rights and the procedure to file a discrimination complaint?	X		Yes. Civil Rights training reinforces the workers duty to advise clients on rights and complaint procedure.
Does the county provide employees Cultural Awareness Training?	X		Bi-Annually.  One program manager indicated that cultural awareness training was required every two years. One program manager indicated that she was unsure as to whether staff were provided ADA and sensitivity (access and accommodation) trainings.
Have employees received Cultural Awareness Training within the last year?	X		
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X		Per conversations with numerous workers in the offices, they are aware of various cultures receiving services in their offices.
Do the Children's Services Workers have an understanding of MEPA (Multi-Ethnic Placement Act)?	X		Yes. At sites numerous workers were queried on their knowledge of MEPA, with good results.

## IX. 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

Interview and review areas	Yes	No	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X		Yes, numerous workers were queried on their knowledge.
Do the employees know what the discrimination complaint process is?	X		Yes, numerous workers were queried on their knowledge.  All program managers surveyed demonstrated knowledge of correct procedures.
Did the employees know who the Civil Rights Coordinator is?	X		Yes, all workers that were asked were aware of who the Civil Rights coordinator was.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X		Yes, all workers that were asked were aware of the location of the Civil rights poster.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X		Yes, Compliant Log reviewed at site.



## **X. CONCLUSION**

The CDSS reviewers found the San Luis Obispo County Department of Social Services staff welcoming, informative and very supportive.

Particular thanks to Debbie Aiello, Civil Rights Coordinator, 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 actions to achieve compliance with Division 21 regulations. CDSS Civil Rights Bureau staff are available to provide technical assistance as requested.

The CDSS found the San Luis Obispo County Department of Social Services in substantial compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

For those items found that are not in compliance with current regulations and laws, San Luis Obispo County Department of Social Services 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. The plan must include a schedule by which all actions will be taken to correct the violations.