



JOHN A. WAGNER  
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
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EDMUND G. BROWN JR.  
GOVERNOR

April 8, 2011

Pauline Cravens, Director  
Modoc County Department of Social Services  
120 North Main Street  
Alturas, CA 96101

Dear Ms. Cravens:

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 October 6, 2010. Enclosed is the final report on the review. We apologize for the delay.

There was 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-09-09, all compliance reviews (and corresponding CAPs) performed after January 2008 will be ported 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,

JIM TASHIMA, Acting Chief  
Civil Rights Bureau  
Human Rights and Community Services Division

Enclosure

c: Nancy Bicondoa, Civil Rights Coordinator

Linda Patterson, Branch Chief  
CDSS CalFresh Program M.S. 8-9-32

Mike Papin, Chief  
CalFresh Policy Bureau M.S. 8-9-32

Richard Trujillo, Chief  
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR  
Modoc County Department of Social Services  
Conducted on October 6, 2010**

**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**

**Cindy 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 Modoc County Department of Social 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 6, 2010. An exit interview was held on October 7, 2010 to review the preliminary 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>
Modoc County Department of Social Services	120 S. Main Street, Alturas, CA 96101	CalWORKS/ Welfare to Work	N/A
Modoc County Department of Social Services	120 N. Main Street, Alturas, CA 96101	CalWORKS (Cash), CalFresh, Adult Programs (IHSS-APS) & Children's Services	Spanish

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

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

- Reviewed the 2010 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of 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	4	0
Children Social Workers	1	0
Adult Program Workers	2	0
Receptionist/Screeners	2	0
<b>Total</b>	<b>9</b>	<b>0</b>

#### Program Manager Surveys

Number of surveys distributed	2
Number of surveys received	2

#### Reviewed Case Files

English speakers' case files reviewed	29
Non-English or limited-English speakers' case files reviewed	8
Languages of clients' cases	Spanish, English

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 reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section X 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?	<b>X</b>			Applications can be mailed into the office or taken over the telephone when necessary.
Does the county have extended hours to accommodate clients?	<b>X</b>			Specific arrangements can be made with workers to accommodate client's needs.
Can applicants access services when they cannot go to the office?	<b>X</b>			Special arrangements can be made with the workers by telephone.
Does the county ensure the awareness of available services for individuals in remote areas?	<b>X</b>			Outreach activities include participation in County Health Fairs each year. Availability of services in remote areas through county/community organizations, schools and word of mouth.

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub	<b>X</b>			

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
13)?				
Is the pamphlet distributed and explained to each client at intake and re-certification?	<b>X</b>			Pub 13 pamphlet is distributed and explained to clients at intake and re-certification.
Is the current version of Pub 13 available in Arabic, Armenian, Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukrainian, and Vietnamese.	<b>X</b>			
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?	<b>X</b>			
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	<b>X</b>			
Were the current versions of the required posters present in the lobbies?	<b>X</b>			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	<b>X</b>			
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?	<b>X</b>			



**B. Corrective Actions**  
**NONE**

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

Pub 13	"Your Rights under California Welfare Programs"	03/07 or 03/10
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact the Civil Rights Bureau 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.

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

## A. Findings and Corrective Actions

**Facility Location:** 120 S. Main Street, Alturas, CA 96101

Facility Element	Findings	Corrective Action
Parking	<b>(Repeat Finding)</b> There is no designated "accessible" parking located in this lot. (Shared with county Probation Department.	Bring parking lot in to compliance (see below).
	No unauthorized parking signage at 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
	No accessible parking spaces located.	Accessible parking spaces shall be located as near as practical to a primary entrance and shall have required spaces according to table. (CA T24 1129B.1, ADA 4.1.2(5)(a)) p. 134
	No adequate van-accessible parking	One in every 8 accessible spaces (no fewer than 1) shall

	spaces.	be designated van accessible. (CA T24 1129B.3.2, ADA 4.1.2(5)(b)) p. 136
	No additional signage below the symbol sign stating "Minimum Fine \$250.00"	For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p. 133
	No freestanding sign or Wall-mounted sign.	Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.4.1, ADA 4.6.5) p. 134  Wall signage shall be centered 36" minimum above grade, ground, or sidewalk at the interior end of space. (CA T24 1129B.3.1) p. 134
	No Accessible space.	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p. 135  Access aisles should be located on the passenger side of a space, and should be a min. of 18' long by 5" wide for aisles, serving car accessible spaces, and a min. 18' by 8' wide for aisles serving van accessible spaces. (CA T24 1129B.3.1) (ADA 4.6.3)  Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p. 135

		<p>Access aisles should be located on the passenger side of a space, and should be a min. of 18' long by 5" wide for aisles, serving car accessible spaces, and a min. 18' by 8' wide for aisles serving van accessible spaces. (CA T24 1129B.3.1) (ADA 4.6.3)</p>
	No Van-Accessible space.	<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.3.2, ADA 4.1.2(5)(b)) p. 136</p>
	No signage on pavement	<p>Van-accessible spaces shall have a sign "Van-Accessible" mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space. (CA T24 1129B.4.2, ADA 4.1.2(5)(B), 4.6.4) p. 133</p> <p>The surface of each accessible parking stall or space must have a surface identification duplicating either of the following schemes:</p> <ul style="list-style-type: none"> <li>• By outlining or painting the stall or space in blue and outlining on the ground in the stall or space in white or suitable contrasting color a profile view depicting a</li> </ul>

		<p>wheelchair with occupant; OR</p> <ul style="list-style-type: none"> <li>By outlining a profile view or a wheelchair with occupant in white on blue background. The profile view shall be located so that it is visible to a traffic enforcement officer when a vehicle is properly parked in the space and shall be 36" by 36".</li> </ul> <p>Pavement signage shall be 36" x 36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.1 &amp; 2) p 133</p>
	No "No Parking" painted on pavement in access aisles.	<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.3.2) p. 135</p>
	Persons with disabilities forced to go behind cars.	<p>Persons with disabilities shall not be forced to go behind parked cars except their own. (CA T24 1129B.3.3)</p>
	No access aisles connect to the accessible path of travel.	<p>Access aisles (load and unload) must connect to the accessible path of travel, including curb cuts or ramps as needed. (CA T24 1129B.3.3, ADA 4.6.3) p. 135</p> <p>Walkways minimum 48". (CA T24 1133B.7.1) p. 160</p>





	\$250.00."	an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p. 133
	Freestanding sign too low at 60".	Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.4.1, ADA 4.6.5) p. 134  Wall signage shall be centered 36" minimum above grade, ground, or sidewalk at the interior end of space. (CA T24 1129B.3.1) p. 134
	Accessible space 8' wide.	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p. 135  Access aisles should be located on the passenger side of a space, and should be a min. of 18' long by 5' wide for aisles, serving car accessible spaces, and a min. 18' by 8' wide for aisles serving van accessible spaces. (CA T24 1129B.3.1) (ADA 4.6.3)
	Signage on pavement does not clearly depict a wheelchair w/occupant, therefore, needs re-painting.	The surface of each accessible parking stall or space must have a surface identification duplicating either of the following schemes: <ul style="list-style-type: none"> <li>• By outlining or painting the stall or space in blue and outlining on the ground in the stall or space in white or suitable contrasting color</li> </ul>



		<p>a profile view depicting a wheelchair with occupant; OR</p> <ul style="list-style-type: none"> <li>• By outlining a profile view or a wheelchair with occupant in white on blue background. The profile view shall be located so that it is visible to a traffic enforcement officer when a vehicle is properly parked in the space and shall be 36" by 36".</li> </ul> <p>Pavement signage shall be 36" x 36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.1 &amp; 2) p 133</p>
Unisex Restroom	No Accessible signage on the door, and on the wall, adjacent to the latch side of the door.	<p>Door sign and wall sign shall be 60" above the floor to the center line of sign.</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>

	No insulation on pipes under sink.	Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.4.7.1, ADA 4.24.6) p. 343
	Toilet protector too high at 54".	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
	Mirror too high at 48".	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
	Paper Towel dispenser 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.8.3, ADA 4.23.7) p. 294

## **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?	<b>X</b>			Lobby staff at initial contact identified the language needs by using the identification card  "I speak card."
Does the county use a primary language form?		<b>X</b>		Staff relies on the SAWS-1 and/or Statement of Facts (SOF) for this information. IHSS uses the Soc 293.
Are non-English- or limited- English-speaking clients provided bilingual	<b>X</b>			

Question	Yes	No	Some-times	Comments
services?				
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			There is no bilingual worker at this time. However, the agency utilizes translation services through a contract service, and through using the Language Line.
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			There is no bilingual worker at this time. However, the agency utilizes translation services through a contract service, and through using the Language Line.
Are county interpreters determined to be competent?	X			
Does the county have adequate interpreter services?	X			Since there is limited non-English speaking clientele, interpretive services are not often needed, and when they are, they use the contracted services.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		The staff reports that using minors to interpret is not appropriate and not done.
Does the county allow the client to provide his or her own interpreter?	X			
Does the county ensure that the client-provided interpreter understands what is being interpreted	X			The majority of workers interviewed have never required the use of an interpreter. Workers state if

Question	Yes	No	Some- times	Comments
for the client?				there is any doubt that the client provided interpreter does not understand, interpretive services are then provided.
Does the county use the CDSS-translated forms in the clients' primary languages?	<b>X</b>			
Is the information that is to be inserted into NOA translated into the client's primary language?	<b>X</b>			
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)?	<b>X</b>			The county staff stated they would provide their clients with whatever auxiliary aids they needed and would do whatever it takes to accommodate their clients.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	<b>X</b>			Workers stated they would read or write for the client and would help in any way needed..
Does the county offer screening for learning disabilities?	<b>X</b>			It is the policy of the county to offer screening through Employment Services Program WTW staff.
Is there an established process for offering screening?	<b>X</b>			

Question	Yes	No	Some-times	Comments
Is the client identified as having a learning disability referred for evaluation?	X			They are referred to the Modoc County Department of Education.

**B. Corrective Actions**  
**NONE**

**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 (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	ER referral form, CWS/CMS	SOC 295	SAWS 1, Statement of Facts	SAWS 1
Primary language documentation	ER referral form, CWS/CMS	SOC 295	SAWS 1 & Statement of Facts	SOC 295
Method of providing bilingual services and documentation	T.E.A.C.H. interpreters & Language Line. Noted in case narrative in WTW cases.	T.E.A.C.H. interpreters & Language Line. Noted in case narrative in WTW cases.	T.E.A.C.H. interpreters & Language Line. Noted in case narrative in WTW cases.	T.E.A.C.H. interpreters & Language Line. Noted in case narrative in WTW cases.
Client provided own interpreter	None found in case file samples.	None found in case file samples.	None found in case file samples.	None found in case file samples.

<b>Documented Item</b>	<b>Children's Services</b>	<b>Adult Programs (IHSS &amp; APS)</b>	<b>CalWORKs &amp; Employment Services</b>	<b>Non-Assistance CalFresh</b>
Method to inform client of potential problem using own interpreter	None found in case file samples.	None found in case file samples.	None found in case file samples.	None found in case file samples.
Release of information to Interpreter	None found in case file samples.	None found in case file samples.	None found in case file samples.	None found in case file samples.
Individual's acceptance or refusal of written material offered in primary language	Statement of Facts.	Statement of Facts.	None found in case file samples.	None found in case file samples.
Documentation of minor used as interpreter	None found in case file samples.	None found in case file samples.	None found in case file samples.	None found in case file samples.
Documentation of circumstances for using minor interpreter temporarily	None found in case file samples.	None found in case file samples.	None found in case file samples.	None found in case file samples.
Translated notice of actions (NOA) contain translated inserts	Provided as needed on Spanish NOA's.	Provided as needed on Spanish NOA's.	None found in case file samples.	Provided as needed on Spanish NOA's.
Method of documenting a client's request for auxiliary aids and services	Would be in case narrative (None found in case samples)	Would be in case narrative (None found in case samples)	Would be in case narrative (None found in case samples)	Would be in case narrative (None found in case samples)

**B. Corrective Actions**  
**NONE**

## 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			Workers stated they have had continued Division 21 Training.
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			
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			

### B. Corrective Actions NONE



## 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

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?		X		Most of the workers could not easily identify the difference between a program, discrimination, and a personnel complaint.
Did the employees know who the Civil Rights Coordinator is?	X			
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	Modoc 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

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

The Modoc County Department of Social Services Civil Rights Compliance Plan for the period December 2009 Thru November 30, 2010, was received on October 13, 2009. It is approved as submitted.

## **X. CONCLUSION**

The CDSS reviewer found the Modoc County Department of Social Services staff warm, welcoming, informative and very supportive. Particular thanks to Nancy Bicondoa, Civil Rights Coordinator, for organizing the details of the review. In each District Office, staff was very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Modoc County Department of Social Services in substantial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The Modoc 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; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is 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.