



CDSS

MILL LIGHTBOURNE
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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES

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EDMUND G. BROWN JR.
GOVERNOR

May 12, 2011

Kathy Gallagher, Director
Santa Barbara County Department of Social Services
234 Camino del Remedio
Santa Barbara, CA 93110

Dear Ms. Gallagher:

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 November 2 – 5, 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 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.

Sincerely,

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

Enclosure

c: Eddie Alanis, Civil Rights Coordinator Investigator

Terrie Concellos, Civil Rights Coordinator

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

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

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Western Region

Jodie Berger, Regional Counsel
Legal Services of Northern California

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
Santa Barbara County Department of Social Services
Conducted on November 2 – 5, 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 Santa Barbara 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 November 2 – 4, 2010. An exit interview was held on November 5, 2010 to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Lompoc Office	1100 West Laurel Ave. Lompoc, CA 93436	CalWORKs CalFresh Child Welfare Services Adult Protective Services	Spanish
Santa Maria Office	2125 S. Centerpoint Pkwy Santa Maria, CA 93455	CalFresh Child Welfare Services Adult Protective Services In Home Support Services	Spanish
Santa Barbara Office	234 Camino del Remedio Santa Barbara, CA 93110	CalWORKs CalFresh Child Welfare Services Adult Protective Services In Home Support Services	Spanish
Benefit Service Center	1318 S. Broadway Santa Maria, CA 93454	Adult Protective Services (Case File Review Only)	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

Classifications	Total	Bilingual
Eligibility Workers	8	4
Children Social Workers	3	1
Adult Program Workers	3	2
Receptionist/Screeners	3	3
Total	17	10

Program Manager Surveys

Number of surveys distributed	3
Number of surveys received	7

Reviewed Case Files

English speakers' case files reviewed	12
Non-English or limited-English speakers' case files reviewed	48
Languages of clients' cases	Spanish, Hmong, Arabic, 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

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Lompoc Office Hours are 7:30 to 5:30. Referrals are taken 24/7 for CWS.APS is 24/7. Access to other services is available through mail or telephone.
Does the county have extended hours to accommodate clients?	X			Arrangements can be made on a case by case basis.

Can applicants access services when they cannot go to the office?	X			Clients can access services by telephone or mail. Home visits can be arranged if needed.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Through outreach, the county website and CBOs. In the one remote area of our County there is an Out-station staffed in Cuyama Valley.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)?	X			Staff interviewed stated the Pub 13 is distributed at intake and re-certification.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			
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, Ukranian, Vietnamese?			X	The Pub 13 was not available in the lobby at the Santa Barbara Office, and the Pub 13 was not available in Spanish at the Santa Maria Office.
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?	X			
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?			X	Santa Maria Office Staff interviewed said they did not know if the Pub 13 is available in Braille, Large Print, Audio, or in Spanish.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
				Santa Barbara Office Staff did not know if they had the Pub 13 available in large print, audio and Braille. They had to ask someone who knew.
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	The posters did not have the current Civil Rights Coordinator information on them in the Santa Barbara Office.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			

B. Corrective Actions

Informational Element	Corrective Action Required
Translated Pub 13	Santa Barbara County shall ensure that the current version of the Pub 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language. Div. 21-115.2
Auxiliary aids	Santa Barbara County shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.4

Informational Element	Corrective Action Required
Posters	Santa Barbara County shall ensure that the most current version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms. Div. 21-107.211

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.

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: 1100 West Laurel Ave.
Lompoc, CA 93436

Facility Element	Findings	Corrective Action
Parking	There is 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
	There is no additional signage below the disabled symbol sign.	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

	<p>Accessible space is too short at 17'</p>	<p>T24 1129B.4.1) p. 133</p> <p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p. 135</p> <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>
	<p>Van-Accessible space too short at 17'</p>	<p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p 135</p> <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>
	<p>Door Pressure on double doors (left door) too high at 12 lbs. and (right door) too high at 11 lbs.</p>	<p>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</p> <p>Force to open fire door, minimum allowable not to exceed 15 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(1)) p. 201</p>

Men's Restroom	<p>Counter too high at 37"</p> <p>Soap dispenser operable parts too high at 48"</p>	<p>Sink is mounted with a counter or rim no higher than 34". (CA T24 1115B.4.7.1, ADA 4.24.2) p. 342</p> <p>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</p>
Women's Restroom	<p>Counter too high at 37"</p> <p>Personal Hygiene Dispenser operable parts, including coin slots too high at 54".</p>	<p>Sink is mounted with a counter or rim no higher than 34". (CA T24 1115B.4.7.1, ADA 4.24.2) p. 342</p> <p>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</p>

C. Facility Location: 2125 S. Centerpoint Pkwy.
Santa Maria, CA 93455

Facility Element	Findings	Corrective Action
Parking	No additional signage below the disabled symbol signs.	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
Client lobby	Pub 13 (Spanish) not in lobby.	Current: 03/07 (Div 21-107.221) or 03/10.
Water fountain	Drinking fountain too high at 40"	The spout is located within 6" of the front edge and 36" of the floor. The water stream is parallel to the front edge of the fountain. (CA T24 1117B.1.4, ADA 4.15.3) p. 233
Men's Restroom	Door pressure too high at 10 lbs. Soap dispenser too high at operable parts at 51".	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 201 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	Door pressure too high at 8 lbs. Hot water drain pipes not insulated or covered. (Left one missing)	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 201 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>Soap dispenser at operable part too high at 50".</p> <p>Personal Hygiene Dispenser operable parts, including coin slots too high at 50".</p>	<p>p. 343</p> <p>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</p> <p>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</p>
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E. Facility Location: 234 Camino del Remedio
Santa Barbara, CA 93110

Facility Element	Findings	Corrective Action
Parking	There is no additional signage below the disabled symbol sign.	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

	<p>Accessible space is too short at 17".</p> <p>Van Accessible space is too short at 17"</p>	<p>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)</p> <p>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)</p>
Client lobby	<p>Accessible Counter too high at 54".</p> <p>No Pub 13 available in lobby.</p>	<p>Height of accessible tables or counters is between 28" – 34" from floor finish. (CA T24 1122B.4, ADA 4.32.4) p. 388</p> <p>Current: 03/07 (Div 21-107.221) or 03/10.</p>
Water fountain	Spout too high at 37 1/2"	The spout is located within 6" of the front edge and 36" of the

		<p>floor. The water stream is parallel to the front edge of the fountain. (CA T24 1117B.1.4, ADA 4.15.3) p. 233</p>
Men's Restroom	<p>Door sign too high.</p> <p>Door pressure too high at 9 lbs.</p> <p>Hot water drain pipes not insulated or covered. (Right one missing)</p>	<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> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 201</p> <p>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</p>
Women's Restroom	Accessible sign too high.	Door sign and wall sign shall be 60" above the floor to the

		<p>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>
	Door pressure too high at 9 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 201

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

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			Client indicates language preference on their application at intake, and then it is coded.
Does the county use a primary language form?		X		Clients indicate on the SAWS 1 Form and/or Public Assistance inquiry Form.
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Client is assigned to a bilingual worker. If the county does not have a bilingual worker that speaks the client's language, then the county will secure an interpreter.
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			Workers contact Human Resources to arrange for an interpreter.
Is there a delay in providing services?		X		No delay in obtaining bilingual services.

Question	Yes	No	Some-times	Comments
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			County has telephone interpreter services.
Are county interpreters determined to be competent?	X			The county interpreters are certified by the department which entails reading and writing in that language.
Does the county have adequate interpreter services?			X	Staff interviewed stated the county has adequate interpreter services, however CWS Manager stated they are having a challenge recruiting for Bi-lingual staff per Manager Survey.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		
Does the county allow the client to provide his or her own interpreter?	X			
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			The client-provided interpreter must sign a release form.
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	X			

Question	Yes	No	Some-times	Comments
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)?				
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			The county assists the client as needed.
Does the county offer screening for learning disabilities?	X			Screening is available through the Welfare to Work Program.
Is there an established process for offering screening?	X			Screening is available through the Welfare to Work Program.
Is the client identified as having a learning disability referred for evaluation?	X			The client is referred to the Department of Rehabilitation.

B. Corrective Actions

Area of Findings	Corrective Actions
Bilingual Staff	Santa Barbara County shall ensure that a sufficient number of qualified bilingual employees shall be assigned to positions and locations serving a substantial number of non-English-speaking persons. Div. 21-115.1

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	CWS/CMS, Referral Form, and Court documents.	Soc 342, Public Assistance Inquiry Form. Soc 293.	SAWS 1, Public Assistance Inquiry Form.	SAWS 1. Public Assistance Inquiry Form.
Primary language documentation	CWS/CMS, Referral Form and Court documents.	Soc 342, Public Assistance Inquiry Form. Soc 293.	SAWS , DSA 882, Public Assistance Inquiry Form.	SAWS 1, Public Assistance Inquiry Form.
Method of providing bilingual services and documentation	Assigned to a bilingual worker.	Assigned to bilingual worker and noted in case narrative.	Assigned to worker. No documentation found in cases reviewed.	Assigned to bilingual worker. No documentation found in cases reviewed.
Client provided own interpreter	No cases found in this case sample.	Documented in case narrative.	Documented in case narrative.	Documented in case narrative.
Method to inform client of potential problem using own interpreter	It would be verbally explained to client.	Verbally explained to client and noted in the case narrative along with signed release form.	It would be verbally explained to client.	It would be verbally explained to client.
Release of information to Interpreter	Client is advised and must sign release form W-711	Client is advised and must sign release form W-711	Client is advised and must sign release form W-711	Client is advised and must sign release form W-711
Individual's acceptance or refusal of written material offered in	Client would be asked and response would be noted	Client would be asked and response would be noted	Client is verbally asked at initial visit	Client is verbally asked at initial visit and response

Documented Item	Children's Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
primary language	in case comments.	in case comments.	and response is recorded in computer data base.	is recorded in computer data base.
Documentation of minor used as interpreter	Not found in this sample.	Not found in this sample	Not found in this sample	Not found in this sample
Documentation of circumstances for using minor interpreter temporarily	Not found in this sample	Not found in this sample	Not found in this sample	Not found in this sample
Translated notice of actions (NOA) contain translated inserts	N/A	Not found in this sample	Translated inserts found in Spanish (threshold language). Other languages are available.	Notices have translated inserts in Spanish (threshold language). Other languages are available.
Method of identifying client's disability	Noted in ERR or case comments.	Noted on Face Sheet and/or case summary.	Statement of Facts.	Statement of Facts.
Method of documenting a client's request for auxiliary aids and services	No cases found in this case sample.	No cases found in this case sample.	No cases found in this case sample.	No cases found in this case sample.

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	A few Santa Barbara and a few Santa Maria workers stated they were not sure if they have had Civil Rights Training.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?			X	A few Santa Maria workers stated they did not understand the county policy regarding a client's rights and procedure to file a discrimination complaint.
Does the county provide employees Cultural Awareness Training?			X	A few Santa Barbara and Santa Maria workers stated they did not remember having Cultural Awareness Training.
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

Training Area	Corrective Action
Division 21, Civil Rights Training	Santa Barbara County shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public

Training Area	Corrective Action
	contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1
Cultural Awareness Training	Santa Barbara County shall ensure that all public contact employees receive cultural awareness training to ensure that public contact staff has an understanding of and sensitivity to the various cultural groups in the county's population. Div. 21-117.2

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	Santa Maria office could not identify what a discrimination complaint would be.
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			

Interview and review areas	Yes	No	Some-times	Findings
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	Santa Barbara 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 Santa Barbara County Department of Social Services Civil Rights Compliance Plan for the period September 1, 2010 through August 31, 2011, was received on September 21, 2010. It is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the Santa Barbara County Department of Social Services staff warm, welcoming, informative and supportive. Particular thanks to Eddie Alanis, Human Resources and Staff Development Division Chief, and Judy Doughty, Human Resources Assistant Manager 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 Santa Barbara 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 Santa Barbara 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.