



CDSS

JOHN A. WAGNER  
DIRECTOR

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

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ARNOLD SCHWARZENEGGER  
GOVERNOR

June 25, 2010

Paul Lake, Acting Director  
Sacramento County Department of Human Assistance  
2433 Marconi Avenue  
Sacramento, CA 95821

Dear Mr. Lake:

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 February 22-25, 2010. Enclosed is the final report on the review. We apologize for the delay.

There are some compliance 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 timelines for the completion of all corrective actions and recommendations listed in the attached report.

We have also reviewed the 2010 Civil Rights Compliance Plan. We have included the results of that review in Section IX of the report. Please submit your augmentations addressing the sections with missing information to our office along with your Corrective Action Plan. Upon receipt of the requested information, approval of the Civil Rights Compliance Plan will be made for 2010.

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,

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

Enclosure

c: Mr. Alexander Kurdyumov, Civil Rights Coordinator

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

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

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

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

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

Joe Torres, Office of Civil Rights  
USDA Food and Nutrition Services  
Supplemental Nutrition Assistance Program (SNAP)  
Western Region

Dominic Pagano, Office of Civil Right  
USDA Food and Nutrition Services  
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Hope Rios,  
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Supplemental Nutrition Assistance Program (SNAP)  
Western Region

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT**  
**FOR**  
**Sacramento County Department of Human Assistance**  
**Conducted**  
**February 22-25, 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**

**Claudia Cabrera**

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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 Sacramento County Department of Human Assistance 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 February 22-25, 2010. An exit interview was held on February 25, 2010 at the Folsom Blvd Building to review the findings. The following staff attended:

NAME	TITLE	OFFICE
Rob Schultz	Division Chief	Marconi
Dan Peak	Civil Rights Coordinator	Research
Alex Kurdyumov	ASO II	Research
Gordon Gochenaur	ASO II	Arena
Sue Daly	ASO I	Rancho Cordova
Ben Crittenden	ASO I	Pat Wright Building
Laurie Carriker	Program Manager	Rancho Cordova
Deborah Minter	Assistant Program Manager	DHA Administrative Office
Nancy Schieber	ASO II	DHA Administrative Office
Vicky O'Brien	Program Specialist	DHA Administrative Office
James Cook	ASO II	Research
Keith Holman	ASO I	Pat Wright Building
Ludy Garrucho	Acting Program Manager	Bowling Green

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)
Rancho Cordova	10013 Folsom Blvd Sacramento	CalWORKs/Food Stamps	Spanish, Russian
Pat Wright Building	1725 28 <sup>th</sup> Street Sacramento	CalWORKs/Food Stamps	Spanish
Susie Gaines Mitchell	2450 Florin Rd Sacramento	CalWORKs/Food Stamps	Spanish
Bowling Green	4433 Florin Rd Sacramento	CalWORKs/Food Stamps	Spanish, Hmong, Vietnamese

## 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.

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	12	5
Receptionist/Screeners	4	2
<b>Total</b>	<b>16</b>	<b>7</b>

### Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

### Reviewed Case Files

English speakers' case files reviewed	5
Non-English or limited-English speakers' case files reviewed	15
Languages of clients' cases	English, Spanish, Russian, Vietnamese,

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 includes augmentations to the County's Civil Rights Compliance Plan that should be submitted with the corrective action plan.

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>Comments</b>
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X		Normal business hours are 7:00 am-4:00 pm. Staff will accommodate working clients by scheduling appointments after 4 pm if needed. Applications can also be mailed in.
Does the county have extended hours to accommodate clients?	X		Staff will accommodate working clients by scheduling appointments after 4 pm if needed.
Can applicants access services when they cannot go to the office?	X		Clients can mail in applications, access SAC DHAs website or request an in-home visit.
Does the county ensure the awareness of available services for individuals in remote areas?	X		There are out-stationed offices in Galt, Lodi, Community Centers and schools throughout the county as well as SETA and La Familia.

<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		
Is the pamphlet distributed and explained to each client at intake and re-certification?	X		PUB 13 is distributed during initial application and at renewal/re-certification.
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		All offices had the PUB 13 pamphlets available in the lobbies.
Was the Pub 13 available in large print, audio and Braille?		X	<p>The Bowling Green Office did not have the PUB 13 Braille, audio or large print available in the lobby.</p> <p>The Pat Wright Building keeps the PUB 13 Braille, audio and large print in a back room and not with clerical staff in the lobby.</p> <p>All other office had these materials available in the lobby.</p>
Were the current versions of the required posters present in the lobbies?		X	The Susie Gaines Building had an outdated 01/05 PUB 86 poster. All other offices had the required posters.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X		All staff were aware that the CRC poster was located in the lobby.
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	<p>The Rancho Cordova office did not have the sign posted on the entrance door for office hours and the document drop-off directional sign located in the lobby into threshold languages; Spanish and Russian (please see Exhibit A below).</p> <p>The Susie Gaines office did not have the instructional sign located at entrance translated in</p>



Signage, posters, pamphlets	Yes	No	Comments
			<p>threshold language, Spanish (please see Exhibit B below).</p> <p>The ANEX building did not have the instructional signs posted in lobby windows translated into threshold language, Spanish (please see Exhibit C).</p>

Exhibit A

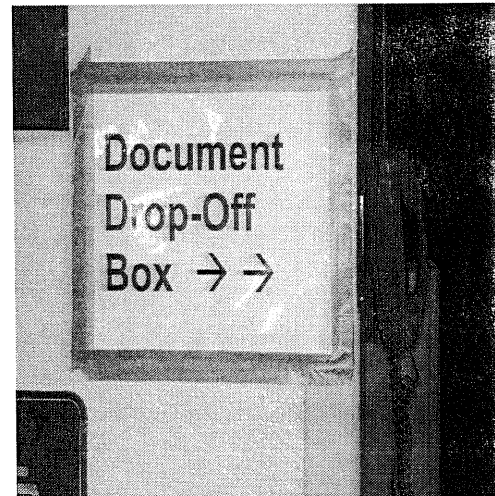
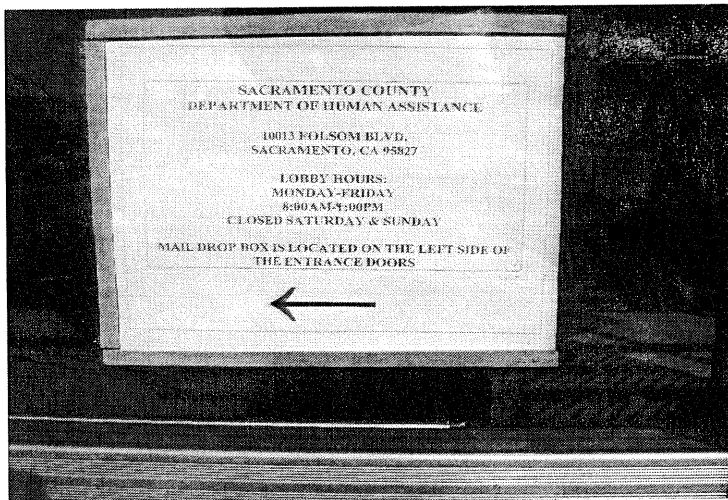
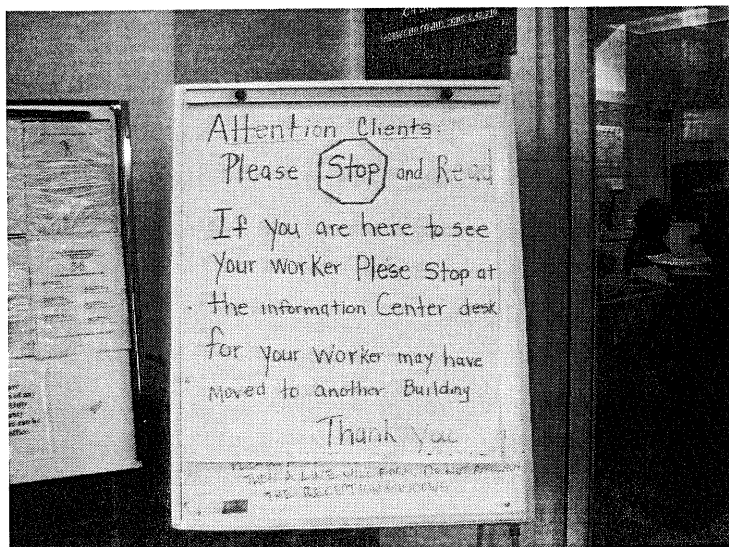
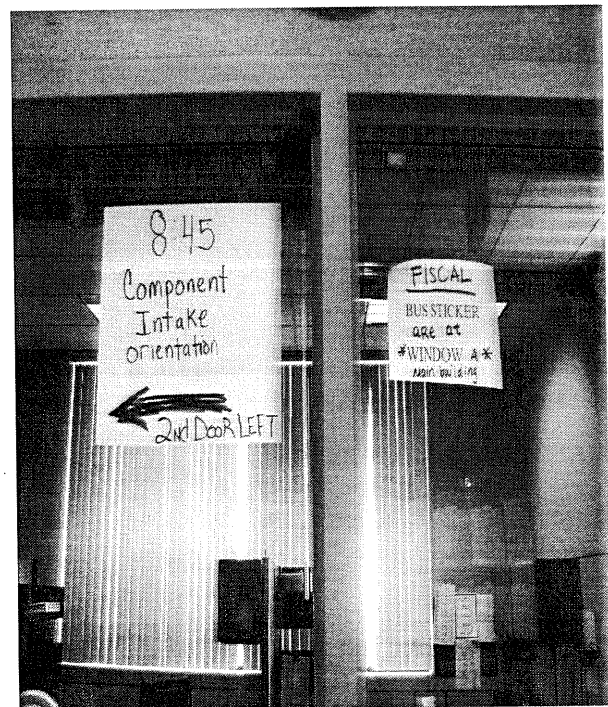
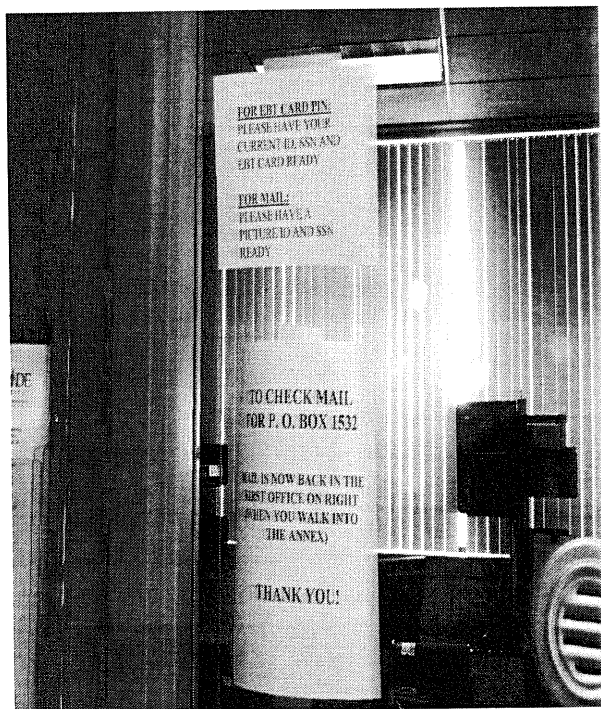
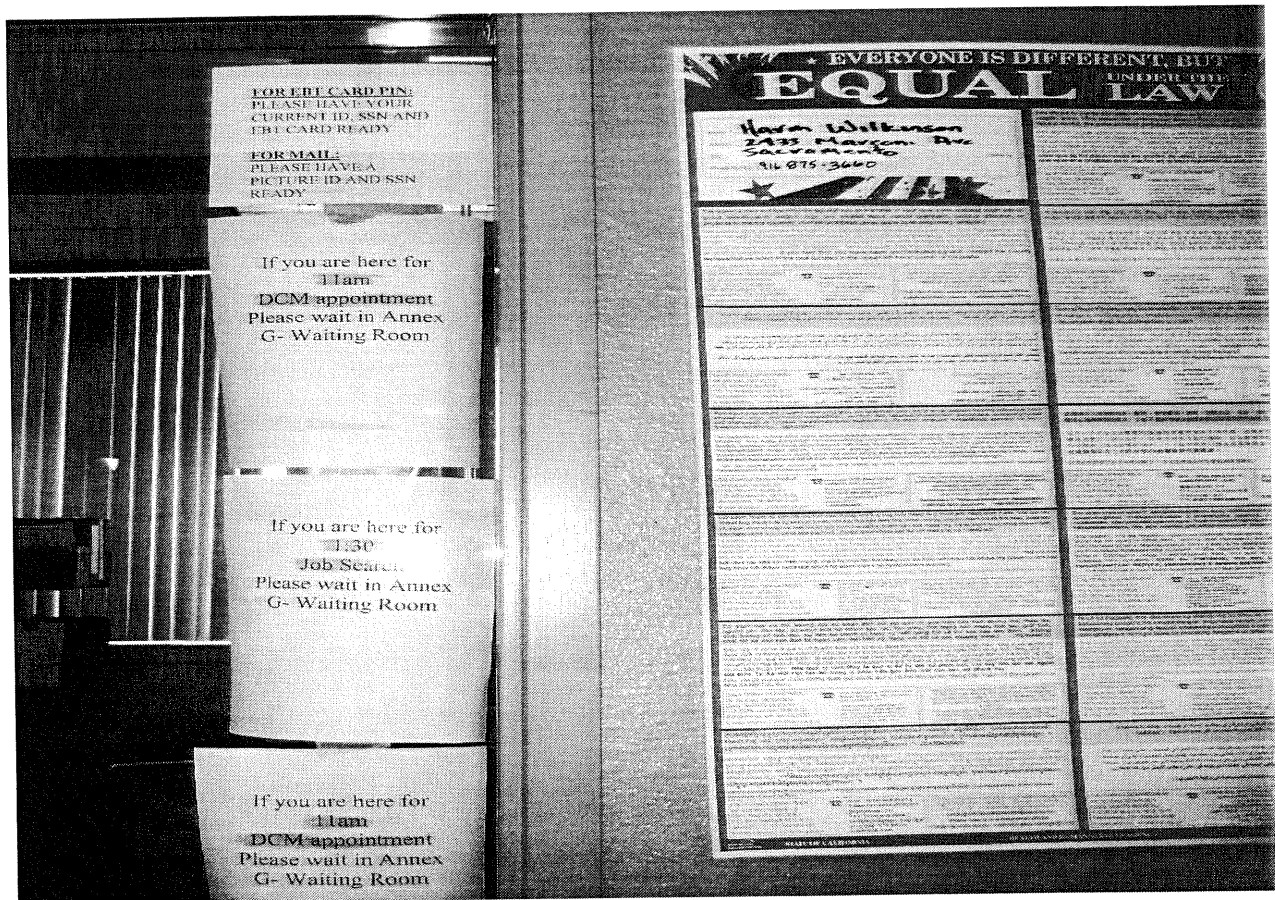


Exhibit B



## Exhibit C



## B. Corrective Actions

Informational Element	Corrective Action Required
Auxiliary aids	Sacramento County DHA shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. <u>Div. 21-115.4</u>
Posters	Sacramento County DHA 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. <u>Div. 21-107.211</u>
Directional signage	Sacramento County DHA shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and that where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages. <u>Div. 21-107.212 and .24</u>

## C. Recommendation

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

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

Contact your program consultant to receive the most recent versions, or download the Pub 13 from the CRB website [http://www.dss.cahwnet.gov/civilrights/YourRights\\_498.htm](http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm).

## IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

### A. Findings and Corrective Actions

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

**Facility Location:** Pat Wright Building, 1725 28<sup>th</sup> Street, Sacramento

Facility Element	Findings	Corrective Action
Parking	The "unauthorized parking" signage located at the 28 <sup>th</sup> street entrance does not have a contact number.	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
	Length of accessible parking space access aisle short at 4ft 7in.	Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.3.1, ADA 4.6.3) p 135

Restroom	<p>Men's: There was no accessible signage on the wall adjacent to the latch side of the door.</p>	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 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>Door pressure is excessive at 15 lbs.</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>Soap dispenser is high at 44 in.</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>Toilet tissue dispenser is located 16 in from front edge of toilet seat.</p>	<p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301</p>
	<p>Women's: There was no accessible</p>	<p>Door sign and wall sign shall be</p>

	signage on the wall adjacent to the latch side of the door.	60" above the floor.  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  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
	Door pressure is excessive at 17 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201
	Toilet tissue dispenser is located 17 in from front edge of toilet seat.	Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301
	Toilet tissue dispenser is too low at 17 in from floor.	Toilet paper dispenser minimum height from floor is 19". (CA T24 1115B.8.4, ADA 4.16.6) pp 295, 301

**Facility Location:** Pat Wright Building-ANEX, 1725 28<sup>th</sup> Street, Sacramento

Facility Element	Findings	Corrective Action
Main Entrance	Clients are not allowed to enter through the door located by the parking lot off of 28 <sup>th</sup> and Q street. There was no directional	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to

	<p>sign posted by the door directing clients to the entrance around the corner.</p> <p>There was no ISA (International Symbol of Accessibility) sign posted at the entrance.</p> <p>Door pressure is excessive at 21 lbs.</p>	<p>accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.1) pp 186, 394</p> <p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.1) pp 186, 394</p> <p>Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p 396</p> <p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p 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>
Client lobby	PUB 86 did not have the current contact information for the civil rights coordinator.	PUB 86, dated 3/07, with current CRC information. (Div 21-107.211)



**Facility Location:** Susie Gaines Building, 2450 Florin Rd, Sacramento

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Parking	<p>Signage on pavement in accessible spaces of wheelchair w/ occupant needs to be repainted.</p> <p>The words "NO PARKING" were not painted on pavement in access aisles.</p>	<p>Pavement signage shall be 36" x 36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.2) p 134</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.3.2) p 135</p>
Client lobby	PUB 86 was outdated, 01/05.	PUB 86, dated 3/07, with current CRC information. (Div 21-107.211)
Restroom	<p>Men's: Door pressure is excessive at 13 lbs.</p> <p>Toilet tissue dispenser was located 14 in from front edge of toilet seat.</p> <p>Women's: Door pressure is excessive at 11 lbs.</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>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201</p>

**Facility Location:** Bowling Green Building, 4433 Florin Rd, Sacramento

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Parking	Entrance to off-street parking through the Home Depot parking lot did not have the "unauthorized parking" sign.	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



		<p>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</p>
	<p>The words "NO PARKING" need to be repainted in access aisles.</p>	<p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.3.2) p 135</p>
Main entrance	<p>Door pressure is excessive at 15 lbs.</p> <p>There was no ISA (International Symbol of Accessibility) sign posted at the entrance.</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p 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> <p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.1) pp 186, 394</p> <p>Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background,</p>

		either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p 396
Client Interview Rooms	Interview rooms are not accessible. Wheelchair turning space in rooms is too narrow.	Wheelchair Turning Space is a minimum space for a wheelchair to turn 180 degrees in a 60" diameter or T-shaped space. (CA T24 1118B.3, ADA 4.2.3) p 236
Restroom	Men's: Door pressure is excessive at 15 lbs.  Women's: Door pressure is excessive at 15 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201  Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201

## B. Recommendation

There was a "Drop-Box" located near the entrance into the lobby. This is not accessible as it is located too high. It is recommended the box be lowered to a maximum of 40" making it accessible.

## 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	Comments
Does the county identify a client's language need upon first contact? How?	X		Clients identify their language need by filling out a Primary Language Designation Form, SC 106.
Does the county use a primary language form?	X		SC 106
Does the client self-declare on this form?	X		Clients fill out the SC 106.
Are non-English- or limited- English-speaking clients provided bilingual services?	X		Non-English or limited-English-speaking clients are either assigned to bilingual workers or interpreters are used to provide bilingual services in the client's primary language.
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		Non-English or limited-English-speaking clients are assigned to a Special Skills Worker.
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		Over-the-phone interpretation is provided through CTS Languagelink, Carmazzi, and Language World. For the hearing impaired, interpretive services are provided through NorCal, Carmazzi and Sign Language Interpreting.
Are county interpreters determined to be competent?	X		Interpreters are certified through Sacramento County.
Does the county have adequate interpreter services?	X		
Does the county allow minors to be interpreters?	X		Minors are only allowed to be used as interpreters only under extenuating

Question	Yes	No	Comments
If so, under what circumstances?			circumstances and just to relay information regarding next appointment when an interpreter will be available.
Does the county allow the client to provide his or her own interpreter?	X		Both client and client-provided interpreter must sign SC106.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X		
Does the county use the CDSS-translated forms in the clients' primary languages?	X		
Is the information that is to be inserted into NOA translated into the client's primary language?	X		
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X		Staff will use a magnifying glass or write back and forth to help assist a client who has a hearing or vision impairment.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X		Staff will assist clients who cannot read or write by reading out loud to them or helping them fill out information. A witness will be present and this is noted in CalWIN case comments.
Does the county offer screening for learning disabilities?	X		Screening for learning disabilities is offered to applicants during intake and renewal or when they enter WTW.
Is there an established process for offering screening?	X		Clients answer a series of questions on an assessment form, WTW17, and depending on the results, clients will be referred to a Vocational Assessment Counselor (VAC) for further evaluation.

Question	Yes	No	Comments
Is the client identified as having a learning disability referred for evaluation?	X		The VAC will accommodate and determine what level of WTW activities the clients will be assigned to.

## B. Corrective Actions

None

## V. 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	CalWORKs	Non-Assisted Food Stamps
Ethnic origin documentation	CalWIN Demographics page, SAWS I	CalWIN Demographics page, SAWS I
Primary language documentation	CalWIN Demographics page, SAWS I, DFA 285, SC106	CalWIN Demographics page, SAWS I, DFA 285, SC106
Method of providing bilingual services and documentation	Document in case comments	Document in case comments
Client provided own interpreter	None found in cases reviewed	None found in cases reviewed
Method to inform client of potential problem using own interpreter	None found in cases reviewed	None found in cases reviewed
Release of information to Interpreter	None found in cases reviewed	None found in cases reviewed
Individual's acceptance or refusal of written material offered in primary language	SC106	SC106
Documentation of minor used as interpreter	None found in cases reviewed	None found in cases reviewed
Documentation of circumstances for using minor interpreter temporarily	None found in cases reviewed	None found in cases reviewed
Translated notice of actions (NOA) contain translated	CalWIN Correspondence	CalWIN Correspondence

Documented Item	CalWORKs	Non-Assisted Food Stamps
inserts		
Method of identifying client's disability	SOF	SOF
Method of documenting a client's request for auxiliary aids and services	None found in cases reviewed	None found in cases reviewed

## 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	Comments
Do employees receive continued Division 21 Training?	X		Staff receive DIV 21 training on an annually basis.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?		X	Not all staff interviewed were aware of the policy and procedure for a discrimination complaint.
Does the county provide employees Cultural Awareness Training?	X		Cultural Awareness Training is included with DIV 21 training.
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	Sacramento County Department of Human Assistance shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1

## 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	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?		X	Six out of 16 staff interviewed were not aware of what a civil rights or program complaint was and could not identify what the procedure is to file a complaint.
Did the employees know who the Civil Rights Coordinator is?		X	Three out of 16 staff interviewed were not aware that Dan Peak was the current Civil Rights Coordinator during the civil rights review.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X		All staff interviewed were aware that the civil rights poster is located in the lobby.
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	Sacramento County Department of Human Assistance shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203
Civil Rights Coordinator	Sacramento County Department of Human Assistance shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Div. 21-117 and 21-107.21

## C. Recommendation

It is recommended that all staff be updated whenever there is a change with the current Civil Rights Coordinator and that they get refresher training on the discrimination complaint process.

## IX. ANNUAL PLAN

Thank you for submitting your agency's Civil Rights Compliance Plan. We found that there were some items missing in the plan. Before your plan is approved, however, we are requesting the following augmentations to your plan:

1. When a client fails to self-identify primary language:
  - What is the policy/procedure for workers in such situation?
  - What is the policy/procedure for disclosing such action to the applicant/recipient?
2. What is the policy/procedure to identify a client's disability (physical or mental), which could limit access or participation?
3. What is the policy/procedure for capturing and reporting statistics regarding the number of cases, by program, of individuals who are identified (self-identified or otherwise identified) as having a disability?
4. What is the policy/procedure for documentation when a client provides their own interpreters, including temporary emergency use of minors to translate?
5. What is the policy/procedure for documentation of a client's consent for release of information to interpreters?
6. What is the policy/procedure for addressing complaints filed with or against a contractor?
7. What is the policy/procedure for ensuring that contractors accommodate individuals with hearing & visual impairments and other disabilities?
8. What is the policy/procedure for contractors to provide appropriate language services, including a breakdown of the number of bilingual staff or interpreters



available to provide services and how written information is effectively communicated to non-English-speaking and limited-English-proficient individuals?

9. What is the policy/procedure for ensuring that contractor staff are adequately trained in the requirements of Division 21?
10. Please provide a copy of Sacramento County DHA's training module that includes the following information:

- Contents of training; what are the specific learning objectives of training?

Please submit your augmentations addressing the above sections to our office along with your Corrective Action Plan. Upon receipt of the requested information, approval of the Civil Rights Compliance Plan will be made for 2010.

## **X. CONCLUSION**

The CDSS found the Sacramento County Department of Human Assistance in satisfactory 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.

Sacramento County DHA must remedy the violations identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the violations.

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.