



WILL LIGHTBOURNE
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



EDMUND G. BROWN JR.
GOVERNOR

July 26, 2011

Ms. Ann E. Connolly, Director
Tuolumne County Human Services Agency
20075 Cedar Road North
Sonora, CA 95370

Dear Ms. Connolly:

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 January 27, 2011. Enclosed is the final report on the review. We apologize for the delay.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a corrective action plan (CAP). Please submit your CAP within sixty days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. Per the Governor's Executive Order S-08-09, all compliance reviews (and corresponding CAPs) performed after January 1, 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, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Amy Arndt, 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

Marlene Fleming, Chief
Field Operations Bureau M.S. 8-9-32

Brian Tam, Chief
CalFresh Management Operations Section M.S. 8-9-32

Paul Gardes
CalFresh 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 Rights
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Hope Rios,
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Jodie Berger, Regional Counsel
Legal Services of Northern California

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
Tuolumne County Human Services Agency
Conducted on March
January 27, 2011**

**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

TABLE OF CONTENTS

- I. INTRODUCTION**
- II. SUMMARY OF METHODOLOGY**
- III. DISSEMINATION OF INFORMATION**
- IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**
- V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**
- VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**
- VII. STAFF DEVELOPMENT AND TRAINING**
- VIII. DISCRIMINATION COMPLAINT PROCEDURES**
- IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL**
- X. CONCLUSION**

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 Tuolumne County Human Services Agency 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 January 27, 2011. An exit interview was held on January 27, 2011 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)
Tuolumne County Human Services Agency	20075 Cedar Rd North Sonora, CA	CalFresh, CalWorks, IHSS	None
Tuolumne County Human Services Agency	20111 Cedar Rd North Sonora, CA	Children's Services	None

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2011 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	4	1
Children Social Workers	2	1
Adult Program Workers	2	
Receptionist/Screeners	2	
Total	10	2

Program Manager Surveys

Number of surveys distributed	2
Number of surveys received	2

Reviewed Case Files

English speakers' case files reviewed	4
Non-English or limited-English speakers' case files reviewed	16
Languages of clients' cases	English, Spanish, Cantonese

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	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X		Staff will accommodate clients by scheduling home visits, allowing applications to be mailed in, and scheduling appointments during lunch.
Does the county have extended hours to accommodate clients?	X		Staff can accommodate clients by scheduling home visits as early as 7:00am and as late as 6:00pm and appointments before the normal business hours or during after hours, when requested and with prior approval.
Can applicants access services when they cannot go to the office?	X		Interviews can be conducted over-the-phone and applications can be mailed in or submitted via the "See for Yourself" web-based application system. The Children's Services office has a 24 hour emergency line that clients can call to speak with a worker assigned for the day.
Does the county ensure the awareness of available services for individuals in remote areas?	X		Some staff are stationed at the Sonora Regional Medical Center M-F from 12:00-4:00pm. Booths are set up during the county fair and information is available at some of the local food banks.

Signage, posters, pamphlets	Yes	No	Comments
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		<p>Pamphlet given to clients during the initial contact and is included in the intake/application packet.</p> <p>For IHSS clients, pamphlet is given during initial home visit and during re-certification.</p>
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		Printed copies of the PUB 13 were only available in English and Spanish. Other languages available can be accessed online and printed upon request.
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	<p>No poster indicating that the PUB 13 is available in other languages but the Children's Services office had a big poster in their lobby that stated "We speak your language. Show us your language so we can provide a telephone interpreter" poster allowing clients to indicate their language so that an interpreter can be provided.</p> <p>The main office also had interpretive services posters available by the receptionist windows.</p>
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?		X	The receptionist at the window for Children's Services was not aware of the location of the PUB 13 Braille and audio. After asking a few staff of the location of these materials, it was determined that it was current practice to store these materials in the interview room. One problem arose from the location

Signage, posters, pamphlets	Yes	No	Comments
			<p>of the materials because if someone comes into the office and asks for the PUB 13 Braille or audio, these materials cannot be accessed if the interview room is in use.</p> <p>The receptionist at the main office clearly identified the location of the PUB 13 Braille, audio and large print.</p>
Were the current versions of the required posters present in the lobbies?	X		Both offices had current copies of required posters.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X		All staff interviewed know of the location of the PUB 86 poster and were able to identify Amy Arndt as the civil rights coordinator.
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	No threshold languages.

B. Corrective Actions

Informational Element	Corrective Action Required
Distribution of CDSS' Pub 13	Tuolumne County shall ensure that the Pub 13 pamphlet, "Your Rights Under California Welfare Programs" is both given and explained to program participants in all of the programs for which CDSS has oversight responsibility. Div. 21-107.221
Translated Pub 13	Tuolumne 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

Informational Element	Corrective Action Required
Auxiliary aids	Tuolumne 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

C. Recommendation

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: 20111 Cedar Rd North, Sonora

Facility Element	Findings	Corrective Action
Parking	There is no additional signage below the symbol sign stating the "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
Main entrance	There is no ISA sign posted at primary entrance. Door pressure is excessive at 15lbs.	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 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
Restroom	Men's restroom: Signage on door is high at 65". Signage on wall is low at 56". Women's restroom: Signage on door is high at 65". Signage on wall is 55 ½". Door pressure is excessive at 10lbs.	Door sign and wall sign shall be 60" above the floor to the center line of sign. Door sign and wall sign shall be 60" above the floor to the center line of sign. Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201

	<p>Unisex restroom:</p> <p>Toilet tissue dispenser is located too far from the front edge of the toilet at 20" and too high at 36".</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>Toilet paper dispenser minimum height from floor is 19". (CA T24 1115B.8.4, ADA 4.16.6) pp 295, 301</p>
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B. Recommendation

Note: women's restroom is located and shared with Public Health. Children's Services may have to consult with Public Health on getting the door pressure adjusted and the signs on the door and wall installed according to the required height.

C. Facility Location: 20075 Cedar Rd. North, Sonora

Facility Element	Findings	Corrective Action
Parking	<p>There is no additional signage below the symbol sign stating the "minimum fine \$250.00".</p> <p>The first freestanding sign height (see image A) is low at 69".</p> <p>The second freestanding sign height (see image B) is low at 76".</p> <p>The words "No Parking" were painted outside of the access aisle.</p>	<p>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 134</p> <p>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</p> <p>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</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.3.1) p 136</p>

Exterior entrance	<p>Door pressure for the outside doors leading to the office, facing the building, are excessive. Left door is 20lbs and right door is 15lbs.</p> <p>Door pressure for the inside doors are excessive. Left door is 10lbs and right door is 11lbs.</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 207</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 207</p>
Client lobby	The designated accessible interview room is not identified as accessible.	<p>Where permanent identification is provided for rooms and spaces, signs are installed on the wall adjacent to the latch outside of the door. (CA T24 1117B.5.7, ADA 4.30.6) p 397</p> <p>Mounting height is 60" above the finished floor to the center of the sign. (CA T24 1117B.5.7, ADA 4.30.6) p 397</p>
Restroom	<p>Men's Restroom:</p> <p>Both the sign on the wall and on the door is high at 62 ½".</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 286</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</p>

		1117B.5.5.1, ADA 4.30.4) p 286
	The space in front of the urinal is not wide enough, therefore making it inaccessible.	Urinals: Where there are urinals provided, at least one (1) shall provide a clear floor space of 30" wide x 48" deep in front of the urinal to allow for a forward approach. This clear space may extend 6" maximum under the urinal if the urinal has a 9" minimum toe clearance from the floor to the urinal's bottom. (CA T24 1115B.4.2.3, ADA 4.18.3 & 4.22.5) p 289
	The door handle is high at 49", therefore, inaccessible.	The hardware shall be centered between 30" and 44" above the floor (CA T2401133B2.5.2) (ADA 4.13.9) p 211
	Women's Restroom:	
	Both the sign on the wall and on the door is high at 62".	Door sign and wall sign shall be 60" above the floor to the center line of sign. 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 286 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 286

D. Corrective Action

Image A



Image B



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		Form WD 55-183 is given to all clients during screening and initial contact.
Does the county use a primary language form?	X		Primary Language Form WD 55-183.
Does the client self-declare on this form?	X		Client fills out form.
Are non-English- or limited- English-speaking clients provided bilingual services?	X		Non-English or limited-English speaking clients are provided interpretive services through bilingual staff or through the use of Language Line.
After it has been determined that the client is limited-English or non-English speaking, is there	X		If available, a county bilingual staff will be used to interpret. If no bilingual staff is available, workers can either use Language Line or procure an

Question	Yes	No	Comments
a county process for procuring an interpreter?			interpreter using the list of volunteer interpreters within the community.
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		Language Line, county interpreter list, and a volunteer list of interpreters within the community.
Are county interpreters determined to be competent?	X		All county interpreters are certified.
Does the county have adequate interpreter services?	X		Certified bilingual staff and language line are available for interpretive services.
Does the county allow minors to be interpreters? If so, under what circumstances?		X	Only under an extreme emergency.
Does the county allow the client to provide his or her own interpreter?	X		If requested, clients may use their own interpreter.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X		Workers will speak to the client provided interpreter and determine their level of understanding prior to using them as interpreters to make sure they can effectively communicate what is being interpreted.
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	X		Staff are aware of the availability of the stereo amplified listener for clients who are hearing impaired. An ASL interpreter can also be provided. Interactive interviews can also be scheduled.

Question	Yes	No	Comments
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		For a client who cannot read, the worker will read out loud and assist in filling out any forms. Print on forms can be enlarged as well. This will be documented in the C-IV journal.

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	IHSS	CalWORKs	Non-Assistance CalFresh
Ethnic origin documentation	Emergency Response Referral, CMS-CWS	SOC 295	SAWS I, DFA 285	C-IV Individual Demographics, SAWS I
Primary language documentation	Primary Language Designation Form WD 55-183, C-IV case summary	SOC 295, Primary Language Designation Form WD 55-183	SAWS I, DFA 285, C-IV case summary page	C-IV Case Summary, SAWS I
Method of providing bilingual services and documentation	C-IV case summary	Case narrative	C-IV case summary	C-IV Journal
Client provided own interpreter	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed
Method to inform	None found in	None found in	Spanish-	Spanish-

Documented Item	Children's Services	IHSS	CalWORKs	Non-Assistance CalFresh
client of potential problem using own interpreter	cases reviewed	cases reviewed	speaking cases reviewed had a Spanish bilingual staff assigned to case	speaking cases reviewed had a Spanish bilingual staff assigned to case
Release of information to Interpreter	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed
Individual's acceptance or refusal of written material offered in primary language	Primary Language Designation Form WD 55-183	Primary Language Designation Form WD 55-183	Primary Language Designation Form WD 55-183	Primary Language Designation Form WD 55-183
Documentation of minor used as interpreter	None found in cases reviewed	None found in cases reviewed	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	None found in cases reviewed	None found in cases reviewed
Translated notice of actions (NOA) contain translated inserts	None found in cases reviewed	Case file	Case file	C-IV Correspondence tab
Method of identifying client's disability	None found in cases reviewed	Case narrative	SOF	SOF
Method of documenting a client's request for auxiliary aids and services	Primary Language Designation Form WD 55-183	Primary Language Designation Form WD 55-183	Primary Language Designation Form, WD 85-183	Primary Language Designation Form WD 55-183

B. Corrective Actions

Areas of Action	Corrective Action
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23
Temporary use of a minor (under 18 years of age) as an interpreter	When a minor (under 18 years of age) is used as an interpreter, the CWD shall so document the circumstances requiring <u>temporary</u> use of minors in the case record. Div. 21-116.22 Only under extenuating circumstances or at the specific request of the applicant/recipient shall a CWD allow a minor (under the age of 18 years) to temporarily act as an interpreter.
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24

C. Recommendation

Out of the nine county staff interviewed, one was unaware of what the county policy is regarding the use of client-provided interpreters.

Staff interviewed mentioned the use of a form "Oath of Confidentiality" that is to be signed by client-provided interpreters. This form was not found in the cases reviewed where the client preferred to use their own interpreter. If the county has developed such form, staff need to be trained/or reminded that they must use this form and have the client-provided interpreter fill out the form when interpreting for a client.

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		Amy Arndt, the civil rights coordinator, provides mandatory DIV 21 training on a continuous basis. Refresher trainings are also provided through UC Davis.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X		All staff interviewed are able to identify the procedure for filing a discrimination complaint.
Does the county provide employees Cultural Awareness Training?	X		Cultural awareness training is incorporated within DIV 21 training and at times conducted at tribal offices as well.
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	Findings
Can the employees easily identify the difference between a program, discrimination, and a		X	One out of nine staff interviewed was not able to identify the difference between a program, discrimination or personnel complaint.

Interview and review areas	Yes	No	Findings
personnel complaint?			
Did the employees know who the Civil Rights Coordinator is?	X		All staff were able to identify Amy Arndt as the civil rights coordinator.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X		Staff indicated that the civil rights poster was posted in the lobby.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X		

B. Corrective Action

None

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Tuolumne County Human Services Agency Civil Rights Compliance Plan for the period January 1, 2011 through December 31, 2014, was received on January 7, 2011. It is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the Tuolumne County Human Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Amy Arndt, Civil Rights Coordinator, for organizing the details of the review. Staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Tuolumne County Human Services Agency 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 Tuolumne County Human Services Agency 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.