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DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

February 27, 2012

Mr. Joseph Chelli, Director
San Joaquin County Human Services Agency
102 San Joaquin Street
P.O. Box 201056
Stockton, CA 95201-3006

Dear Mr. Chelli:


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 San Joaquin County. 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.

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: Melissa Sangalang, Civil Rights Coordinator

Linda Patterson, Branch Chief
CDSS CalFresh Program

Mike Papin, Chief
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
SAN JOAQUIN COUNTY HUMAN SERVICES AGENCY
Conducted on April 11-14, 2011**

**California Department of Social Services
Human Rights and Community Services Division**

**Civil Rights Bureau
744 P Street, M.S. 8-16-70
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Reviewer

Daniel Cervantes

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the San Joaquin 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 April 11-14, 2011. An exit interview was held on April 14, 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)
San Joaquin General Hospital	500 W Hospital Rd. French Camp, CA	NAFS, CalWORKS	Spanish
Channel Medical Group (Part time lease)	701 E Channel Stockton, CA 95202	NAFS, CalWORKS	Spanish
Woodbridge Medical Group (Part time lease)	2401 Turner Road Woodbridge, CA	NAFS, CalWORKS	Spanish
CalWORKS Employment Center	900 E Oak Street, 2 nd Floor Stockton, CA 95202	CalWORKS	Spanish
San Joaquin County HAS	102 S San Joaquin St Stockton, CA	All Programs	Spanish

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2010-2011 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	8	7
Children Social Workers	3	2
Adult Program Workers	3	1
Receptionist/Screeners	3	3
Employment Training Specialist	3	2
Total	20	15

An additional 3 interviews were scheduled but were not conducted due to staff unavailability.

Program Manager Surveys

Number of surveys distributed	5
Number of surveys received	7

Reviewed Case Files

English speakers' case files reviewed	15
Non-English or limited-English speakers' case files reviewed	60
Languages of clients' cases	English, Spanish, Vietnamese, Hmong, Cambodian, Russian, Farsi

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			Clients are allowed to fill out Food Stamp Applications online. They also make accommodations for working clients by providing early morning and evening hours as necessary. They can also mail applications in when necessary.
Does the county have extended hours to accommodate clients?	X			Workers stated that accommodations can be made on an as needed basis.
Can applicants access services	X			See comments above.

when they cannot go to the office?				
Does the county ensure the awareness of available services for individuals in remote areas?	X			Contracted case management agencies (such as the locations in the hospitals visited during this review) are available to individuals in remote areas of the county. The county also provides brochures, pamphlets, and posters at a variety of events/locations within the county. Information is also available from the San Joaquin County HSA website.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)? Is the pamphlet distributed and explained to each client at intake and re-certification?	X			The Pub 13 pamphlet is provided with the initial processing of the application. All staff interviewed explained that they review the Pub 13 with every client at intake and all renewals/recertification. They ask every client if they understand the info provided in the Pub 13.
Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukrainian, Vietnamese?			X	The Woodbridge Medical Group and the San Joaquin hospital location did not have the Pub 13 available.
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		The Woodbridge Medical Center, Channel Medical Group, and San Joaquin General Hospital were

Signage, posters, pamphlets	Yes	No	Some-times	Comments
				missing this poster.
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?				Only the main office located on 102 S San Joaquin Street had alternate versions of the Pub 13 available. San Joaquin Hospital, Channel Medical Group, Woodbridge Medical Group, and the CalWORKs Office were all missing these versions of the Pub 13.
Were the current versions of the required posters present in the lobbies?		X		Of the offices that had the posters, all but 2 were outdated.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			All county staff interviewed knew of the CRC and where her information should be posted.
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			Very good digital display of directional and informational signage at every location visited.

B. Corrective Actions

Informational Element	Corrective Action Required
Translated Pub 13	San Joaquin HSA <u>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.</u> <u>Div. 21-115.2</u>

Informational Element	Corrective Action Required
Auxiliary aids	San Joaquin HSA 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
Posters	San Joaquin HSA 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

C. Recommendations

None

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

Pub 13	"Your Rights under California Welfare Programs"	06/11
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: 500 W. Hospital Rd, French Camp, CA (Facility inside of San Joaquin General Hospital)

Facility Element	Findings	Corrective Action
Restroom (Men's and Women's)	Sign on restroom door(s) not ADA compliant.	<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>

B. Facility Location: 701 E. Channel St. Stockton, CA

Facility Element	Findings	Corrective Action
Exterior entrance	No accessible signage at building's main entrance.	<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>
Restroom (Woman's only)	Paper towel dispenser too high at 50 in.	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

C. Facility Location: 2401 Turner Road, Lodi, CA

Facility Element	Findings	Corrective Action
Parking	<p>No van accessible parking available.</p> <p>No signage, either freestanding or on the wall designating accessible parking stall.</p>	<p>One in every 8 <i>accessible</i> spaces (no fewer than 1) shall be designated van accessible. (CA T24 1129B.3.2, ADA 4.1.2(5)(b)) p 136</p> <p>Each parking space for persons with disabilities shall be identified by a reflectorized sign permanently posted adjacent to</p>

	<p>Available handicap stall only 15 ft long.</p> <p>Handicap parking stall is not located as close as possible to building's main entrance.</p>	<p>and visible from each stall or space, consisting of the International Symbol of Accessibility in white on dark blue background.</p> <p>The sign shall be 70 sq. in. min. and, when in a path of travel, shall be posted at a height of 80" min. from the bottom of the sign to the finished grade. (CA T24 1129B.) (ADA4.6.4) p133</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>Located on shortest accessible route. (CA T24 1129B.1.4, ADA 4.6.2(1)) p 134</p>
Restroom (Unisex)	<p>Soap dispenser too high at 53 in.</p> <p>Toilet protector too high at 48 in.</p> <p>Mirror base too high at 48 in.</p> <p>Paper towel dispenser too high at 41 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>

D. Facility Location: 900 E Oak St., Stockton, CA

Facility Element	Findings	Corrective Action
Outside signage	No accessible signage at building's main entrance.	<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>
Restroom (2 nd Floor)	<p>Men's:</p> <p>Paper towel dispenser too high at 52 in.</p> <p>Women's:</p> <p>Toilet protector dispenser too high at 46 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>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,</p>

	<p>Toilet tissue dispenser too far from front edge of toilet at 39 in.</p>	<p>ADA 4.23.7) p 294</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>
Restroom (3 rd Floor)	<p>Men's:</p> <p>Toilet protector dispenser too high at 39 in.</p> <p>Toilet tissue dispenser too far from front edge of toilet at 39 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 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>

E. Facility Location: 102 S. San Joaquin St., Stockton, CA

Facility Element	Findings	Corrective Action
Parking	<p>Parking is located across the street from the facility under the freeway. The findings from the last review have been fixed with the exception of the following:</p> <p>Only 3 of the 6 handicap</p>	<p>For both posted and wall-</p>

	stalls had proper "minimum Fine \$250.00" signage	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
Restroom (Men's and Women's)	Door pressure excessive at 8 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	X			The county has trained first

Question	Yes	No	Some-times	Comments
a client's language need upon first contact? How?				contact staff/receptionist to identify language needs. If needed, the I SPEAK card is used to help identify a client's language.
Does the county use a primary language form?	X			Form SJ100. The form was consistently found in the case files reviewed.
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Spanish speakers are assigned a Spanish speaking worker. Other languages are offered interpreters in their preferred language as needed.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?				The workers interviewed had knowledge of how to request interpretive services if they could not communicate effectively with the client. San Joaquin HSA has a contract with Certified Languages International to provide translation services over the phone.
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			Please see comments above.
Are county interpreters determined to be competent?	X			Bilingual workers are certified through the county human resources.
Does the county have adequate interpreter services?	X			

Question	Yes	No	Some-times	Comments
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			Client's that prefer their own interpreter must fill out form SJ31.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			County workers make an early determination as to whether client-provided interpreters are competent. If not, the county worker requests their own interpreter.
Does the county use the CDSS-translated forms in the clients' primary languages?			X	Most of the time. There were no issues with Spanish speaking clients. There were two cases reviewed (Vietnamese and Portuguese) in which the client did not receive all forms in their designated language.
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			County staff were knowledgeable about any auxiliary aids needed to assist clients that needed accommodation.

Question	Yes	No	Some-times	Comments
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			County workers stated that they read information slowly and carefully to the client, frequently checking for understanding.
Does the county offer screening for learning disabilities?	X			
Is there an established process for offering screening?	X			Screening is offered in the Employment Services program at orientation.
Is the client identified as having a learning disability referred for evaluation?	X			Clients are referred to the local junior college for further examination.

B. Corrective Actions

Area of Findings	Corrective Actions
Written Materials	San Joaquin HSA must use and provide translated forms, to include translated notice of action forms, in the clients' primary languages when translated by CDSS. Div. 21-115.2

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	SOC 158, CPS2	ACS 48	SAWS 1, SOF	SAWS 1
Primary language documentation	SJ100, CWS/CMS	SJ100, ACS48	SJ100, SAWS 1	SJ100, SAWS 1
Method of providing bilingual services and documentation	Services were provided through a bilingual worker or the language line. There were cases where the service(s) were not documented.	Services were provided through a bilingual worker or the language line. There were cases where the service(s) were not documented.	Services were provided through a bilingual worker or the language line. There were cases where the service(s) were not documented.	Services were provided through a bilingual worker or the language line. There were cases where the service(s) were not documented.
Client provided own interpreter	HSA 31	HSA 31	HSA 31	HSA 31
Method to inform client of potential problem using own interpreter	Worker verbally informed client of the possibility of ineffective communication	Worker verbally informed client of the possibility of ineffective communication	Worker verbally informed client of the possibility of ineffective communication	Worker verbally informed client of the possibility of ineffective communication
Release of information to Interpreter	HSA 31	HSA 31	HSA 31	HSA 31
Individual's acceptance or refusal of written	SJ100	SJ100	SJ100	SJ100

Documented Item	Children's Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
material offered in primary language				
Documentation of minor used as interpreter	Minors not used	Minors not used	Minors not used	Minors not used
Documentation of circumstances for using minor interpreter temporarily	Minors not used	Minors not used	Minors not used	Minors not used
Translated notice of actions (NOA) contain translated inserts	N/A	As needed	As needed	As needed
Method of identifying client's disability	SOF, Case narrative	ACS 48, SOF, Case narrative	SOF, Case narrative	SOF, Case narrative
Method of documenting a client's request for auxiliary aids and services	Case narrative	Case narrative	Case narrative	Case narrative

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

Areas of Action	Corrective Action
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
Documentation of primary language	Each agency shall ensure that case record identification shows the applicant's/recipients ethnic origin and primary language. Div. 21-201.21
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22
General	4. San Joaquin HSA County must ensure that proper documentation is kept in the file that identifies all the required elements the following to ensure compliance with Division 21 Regulations (Div. 21 21-116): [Erika: I think these GAs should reflect the categories above.] <u>to ensure compliance.</u> <u>Div. 21-116</u>

C. Recommendation

Further information concerning interpretive services documentation requirements can be found in ACL 08-65, of December 31, 2008.

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-	Comments
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			times	
Do employees receive continued Division 21 Training?	X			In previous reviews, staff were inconsistent in their answers in regards to Division 21 training. During this review, staff were consistent in the dates of their most recent training.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural Awareness Training?			X	Not all staff were able to state they had received cultural awareness training. Some staff even mentioned that they had never received this type of 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	San Joaquin HSA 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 contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1
Cultural Awareness Training	San Joaquin HSA County shall ensure that

Training Area	Corrective Action
	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			Staff were able to distinguish the different types of complaint without issue.
Did the employees know who the Civil Rights Coordinator is?	X			All staff interviewed were able to name Melissa Sangalang 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			All staff knew about the posters and were able to provide the location in their respective lobby.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			Since the review was conducted, the civil rights log has been reconciled with CDSS Civil Rights Bureau.

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The San Joaquin HSA Civil Rights Compliance Plan for the period October 1, 2010 – September 30, 2011, was received on March 3, 2011. It is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the San Joaquin HSA staff warm, welcoming, informative and very supportive. Particular thanks to Melissa Sangalang, Civil Rights Coordinator, for organizing the details of the review. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

CDSS found the San Joaquin HSA 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.

San Joaquin HSA 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.

Please accept our apologies for the delay in receiving the report. 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.