



CDSS

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DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



EDMUND G. BROWN JR.  
GOVERNOR

April 12, 2012

Melody Brawley, Director  
Lassen County Welfare Department  
720 Richmond Road  
P.O. Box 1359  
Susanville, CA 96130

Dear Ms. Brawley:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office, Cindy Guzman during the course of the Civil Rights Compliance Review of October 12 – 14, 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. In addition, they are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>

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, Chief  
Civil Rights Bureau  
Human Rights and Community Services Division

Enclosure

c: Bill Jost, Civil Rights Coordinator

Linda Patterson, Branch Chief  
CDSS CalFresh Program

Mike Papin, Chief  
CalFresh Policy Bureau

Marlene Fleming, Chief  
Field Operations Bureau

Brian Tam, Chief  
CalFresh Management Operations Section

Paul Gardes  
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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**

**Lassen County Welfare Department**

**Conducted on October 12 – 14, 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**

**Cindy Guzman**

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## **CIVIL RIGHTS COMPLIANCE REVIEW REPORT**

### **I. INTRODUCTION**

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Lassen County Welfare Department with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on October 12 – 14, 2011. An exit interview was held on October 15, 2011 to review the preliminary findings.

The review was conducted in the following locations:

<b>Name of Facility</b>	<b>Address</b>	<b>Programs</b>	<b>Non-English languages spoken by a substantial number of clients (5% or more)</b>
Public Assistance Programs	720 Richmond Road Susanville, CA	Intake/Eligibility Adult Services IHSS	N/A
Lassen Career network	1616 Chestnut Street Susanville, CA	CalWORKS Welfare to Work	N/A
Children's Services	1445 Paul Bunyan Rd. Susanville, CA	Children's Services	N/A

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

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

- Reviewed the 2007 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff

- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

#### Interviews Conducted of Public Contact Staff

<b>Classifications</b>	<b>Total</b>	<b>Bilingual</b>
Eligibility Workers	5	1
Children Social Workers	2	0
Adult Program Workers	1	0
Receptionist/Screeners	2	0
<b>Total</b>	<b>12</b>	<b>1</b>

#### Program Manager Surveys

Number of surveys distributed	3
Number of surveys received	3

#### Reviewed Case Files

English speakers' case files reviewed	40
Non-English or limited-English speakers' case files reviewed	13
Languages of clients' cases	English and Spanish

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

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

Section X of the report is reserved for a declaration of overall compliance.

### III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

#### A. Findings

<b>Access to Services, Information and Outreach</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	<b>X</b>			
Does the county have extended hours to accommodate clients?			<b>X</b>	By appointment and home visits if needed.
Can applicants access services when they cannot go to the office?	<b>X</b>			The county accommodates clients during extreme weather conditions by appointments that can be made by telephone, and in-home appointments are offered.
Does the county ensure the awareness of available services for individuals in remote areas?	<b>X</b>			Through outreach services to rural areas.

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county use the CDSS	<b>X</b>			

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
pamphlet "Your Rights Under California Welfare Programs" (Pub 13)?				
Is the pamphlet distributed and explained to each client at intake and re-certification?	<b>X</b>			
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?	<b>X</b>			
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?	<b>X</b>			
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	<b>X</b>			
Were the current versions of the required posters present in the lobbies?		<b>X</b>		720 Richmond Road needs the current poster "And Justice for All" (#475B)
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?			<b>X</b>	
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?				<b>N/A</b>



## B. Corrective Actions

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

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

Pub 13	"Your Rights under California Welfare Programs"	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](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:** 720 Richmond Road  
Susanville, CA

Facility Element	Findings	Corrective Action
Parking	<p><b>REPEAT FINDING:</b> There is no "unauthorized parking" signage at entrance to off street accessible parking.</p>	<p>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</p>
	<p><b>REPEAT FINDING:</b> Length of Van-Accessible parking space too short at 16". There is no Van Access Aisle.</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</p>

		<p>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><b>REPEAT FINDING:</b></p> <p>There is no clearance access aisle on passenger side of van space.</p>	<p>One in every 8 accessible spaces (p 136) and no less than 1 shall be served by an access aisle 96" wide minimum placed opposite the driver's side and shall be designated Van-Accessible. (CA T24 1129.B.3.2, ADA 4.1.2(5)(b)) p. 136</p>
	<p><b>REPEAT FINDING:</b></p> <p>There is no "No Parking" painted on pavement in access aisle (letters min. 12 " high)</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>
	<p>Signage on pavement is not clearly depicting a wheelchair w/occupant, and needs re-painting.</p>	<p>The surface of each accessible parking stall or space must have a surface identification duplicating either of the following schemes:</p> <ul style="list-style-type: none"> <li>• By outlining or painting the stall or space in blue and outlining on the ground in the stall or space in white or suitable contrasting color a profile view depicting a wheelchair with occupant; OR</li> </ul>

		<ul style="list-style-type: none"> <li>By outlining a profile view or a wheelchair with occupant in white on blue background. The profile view shall be located so that it is visible to a traffic enforcement officer when a vehicle is properly parked in the space and shall be 36" by 36".</li> </ul> <p>Pavement signage shall be 36" x 36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.1 &amp; 2) p. 133.</p>
	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/ Outside signage	No international symbol of accessibility (ISA) signage at primary 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</p>

		T24 1117B.5.2, ADA 4.30.5) p 396
Client lobby	No Poster "And Justice for All" (#475B)	And Justice for All -Current: 12/99 (Div 21-107.211)
Unisex Restroom/ Not Accessible	<p><b>Repeat Finding on Unisex Restroom Not Accessible:</b></p> <p>No international symbol of accessibility (ISA) signage on door or wall.</p> <p>Door knob hand operated, and not operable with a single effort of lever, push/pull.</p> <p>Door width small at 30 "across.</p>	<p>Door sign and wall sign shall be 60" above the floor to the center line of sign.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 281</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 282</p> <p>Locking/Latching Doors: If hand-operated, to be operable with a single effort (e.g.; lever, panic bar, push/pull). (CA T24 1133B.2.5.2, ADA 4.13.9) p. 205</p> <p>Clear Width: Minimum clearance width of exit way must be 32". (CA T24 1133B.2.2) p. 198</p>

	Not adequate turning space. Measured at 35" circular turning diameter.	There shall be a 60" minimum circular turning diameter. (CA T24 1118B.3, ADA 4.2.3) p. 236
	Soap dispenser too high at 49".  Mirror too high at 47".  Paper Towel Dispenser too high at 59".	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

## B. Recommendation

Place notice on Unisex Restroom door that it is not accessible, and not available for public access.

## C. Facility Location: 1616 Chestnut Street Susanville, CA

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

	Freestanding sign height too low at 61" on all handicapped parking.	<p>T24 1129B.4.1) p. 133.</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>Wall signage shall be centered 36" minimum above grade, ground, or sidewalk at the interior end of space. (CA T24 1129B.3.1) p. 134.</p>
Main Entrance	Main entrance door pressure too high at 10 lbs.	<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	No poster "And Justice for All" (#475B)	Need Current: 12/99 "And Justice for All" (#475B) (Div 21-107.211)
Women's Restroom	<p>Door pressure too high at 10 lbs.</p> <p>Soap dispenser too high at 49".</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>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least</p>

		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.
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**E. Facility Location:** 1445 Paul Bunyan Rd.  
Susanville, CA

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Parking	No unauthorized parking signage at entrance to off-street accessible parking.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p. 133.



	<p><b>One handicapped parking space without sign, without access aisle, and no Van Accessible space:</b></p> <p>No Van-Accessible space.</p> <p>No Van-Access Aisle.</p> <p>No Freestanding signs at height of 80" from bottom of sign to top of finish grade, or Wall-counted sign at height 36" minimum.</p>	<p>One in every 8 accessible 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>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>Each parking space for persons with disabilities shall be identified by a reflectorized sign permanently posted adjacent to and visible from each stall or space, consisting of the International Symbol of Accessibility in white on dark blue background.</p>
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		<p>The sign shall be 70 sp. 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>There is no additional sign below the symbol sign stating "Minimum Fine \$250.00."</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. 133.</p>
	<p>No access aisle.</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>No "No Parking" painted on pavement in access aisles (letters min. 12" high)</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>
<p>Outside signage</p>	<p>No Accessible signage at primary entrance- the international symbol of</p>	<p>A sign with the international symbol of accessibility shall be at every primary entrance and</p>

	accessibility (ISA).	<p>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>
Client lobby	Double Door pressure at main entrance too high, left at 12 lbs. and right at 14 lbs.	<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>
Unisex Restroom	<ul style="list-style-type: none"> <li>• Toilet protector too high at 56".</li> <li>• Mirror base too high at 49".</li> <li>• Paper towel dispenser too high at 49".</li> </ul>	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.
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**V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

**A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews**

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county identify a client's language need upon first contact? How?	<b>X</b>			The county uses the "I Speak" cards.
Does the county use a primary language form?		<b>X</b>		
Does the client self-declare on this form?				<b>N/A</b>
Are non-English- or limited- English-speaking clients provided bilingual services?	<b>X</b>			The county has the language line and one bilingual Spanish worker.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	<b>X</b>			The county has the language line and one bilingual Spanish worker.
Is there a delay in providing services?		<b>X</b>		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	<b>X</b>			
Are county interpreters determined to be competent?	<b>X</b>			The county has a Spanish bilingual worker who is certified.
Does the county have adequate interpreter services?	<b>X</b>			
Does the county allow minors to be interpreters?		<b>X</b>		

Question	Yes	No	Some-times	Comments
If so, under what circumstances?				
Does the county allow the client to provide his or her own interpreter?	X			The county informs the client they have the right to free interpretive services.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			The county informs the client they have the right to free interpretive services.
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			
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			Clients can opt to be screened or tested for learning disabilities. Staff can assist them with this process as in reading or writing.
Does the county offer screening for learning	X			

Question	Yes	No	Some-times	Comments
disabilities?				
Is there an established process for offering screening?	X			
Is the client identified as having a learning disability referred for evaluation?	X			

**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**

<b>Documented Item</b>	<b>Children's Services</b>	<b>Adult Programs (IHSS &amp; APS)</b>	<b>CalWORKs &amp; Employment Services</b>	<b>Non-Assistance CalFresh</b>
Ethnic origin documentation	Referral Form	Intake Form	Saws 1	Saws 1
Primary language documentation	Referral Form	Intake Form	Saws 1	Saws 1
Method of providing bilingual services and documentation	In case comments.	In case comments.	In case comments.	In case comments.
Client provided own interpreter	Not noted in case file samples.	Found in case comments.	Not noted in case file samples.	Found in case comments.
Method to inform client of potential problem using own interpreter	Not noted in case file samples.	Not noted in case file samples.	Not noted in case file samples.	Not noted in case file samples.
Release of information to Interpreter	Not noted in case file samples.	Not noted in case file samples.	Not noted in case file samples.	Not noted in case file samples.
Individual's acceptance or refusal of written material offered in	Not noted in case file samples.	Not noted in case file samples.	Not noted in case file samples.	Not noted in case file samples.



Documented Item	Children's Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
primary language				
Documentation of minor used as interpreter	Not noted in case file samples.	Not noted in case file samples.	Not noted in case file samples.	Not noted in case file samples.
Documentation of circumstances for using minor interpreter temporarily	Not noted in case file samples.	Not noted in case file samples.	Not noted in case file samples.	Not noted in case file samples.
Translated notice of actions (NOA) contain translated inserts	Yes.	Yes.	Yes.	Yes.
Method of identifying client's disability	Not noted in case file samples.	Not noted in case file samples.	Not noted in case file samples.	Not noted in case file samples.
Method of documenting a client's request for auxiliary aids and services	Not noted in case file samples.	Not noted in case file samples.	Not noted in case file samples.	Not noted in case file samples.

## B. Corrective Actions/None

General	<p>4.—Lassen 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. 21-116): [Erika: I think these CAs should reflect the categories above.]</p> <p>to ensure compliance.  <u>Div. 21-116</u></p>
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## VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

### A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?			X	Richmond Road says they have Division 21 Training. Paul Bunyan Office, CPS says they don't remember having Division 21 Training.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural Awareness Training?			X	Richmond Road says they have Cultural Awareness Training. Paul Bunyan APS says they have a good training on Cultural awareness. Paul Bunyan CPS says they don't remember having this 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	Lassen 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	Lassen County shall ensure that all public contact employees receive cultural awareness training to ensure that public contact staff has an understanding of and sensitivity to the various cultural groups in the county's population. Div. 21-117.2

## VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

### A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			
Did the employees know who the Civil Rights Coordinator is?	X			

Interview and review areas	Yes	No	Some-times	Findings
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

## IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Lassen County Welfare Department Civil Rights Compliance Plan for the period November 1, 2009, through October 31, 2011 is over due, and therefore not approved.

## X. CONCLUSION

The CDSS reviewer found the Lassen County Welfare Department staff warm, welcoming, informative and very supportive. Particular thanks to Bill Jost, Civil Rights Coordinator, for organizing the details of the review. In each Office, staff was very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Lassen County Welfare Department in adequate 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.

Lassen County Welfare Department 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.

