



CDSS

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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

May 7, 2012

Howard K. Himes, MSW, Director
Fresno County Department of Social Services
P.O. Box 1912
Fresno, CA 93718-1912

Dear Mr. Himes:

This letter is to advise you that the Corrective Action Plan you submitted on June 22, 2011, in response to the results of our February 7-11, 2011 Civil Rights Compliance Review is approved.

We will be monitoring the implementation of your corrective action items through your Civil Rights Coordinator.

If you have any questions, please contact Tiffany Marsh, Program Consultant, at (916) 651-6242. You may also contact your consultant by e-mail at Tiffany.Marsh@dss.ca.gov.

Sincerely,

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

c: Steve Sanchez, Civil Rights Coordinator

Linda Patterson, Branch Chief
CDSS CalFresh Program

Mike Papin, Chief
CalFresh Policy Bureau

Marlene Fleming, Chief
Field Operations Bureau

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Jodie Berger, Regional Counsel
Legal Services of Northern California

**CIVIL RIGHTS CORRECTIVE ACTION PLAN
FOR
Fresno County Department of Social Services
Review Conducted on February 7-10, 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

Mary Rockwood

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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 Fresno County Department of Social Services (DSS) 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 February 7-10, 2011. An exit interview was held on February 10, 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)
West Fresno Regional Center	142 E. California St., Fresno	CalWORKs Cash; CalFresh	Spanish
Selma Regional Center	3800/3880 McCall St., Selma	CalWORKs Cash; CalFresh	Spanish
Children's Services Facility	1360 L Street, Fresno	Child Protective Services (ER, FM/FR)	Spanish
IHSS Facility	3821 Clark St., Fresno	IHSS	Spanish

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2010-11 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
- Vendor Contract Review
- Welfare Fraud Case Documentation Review

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

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

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Worker	4	4
Children Social Workers/Practitioner	3	2
Adult Program Workers	2	2
Reception/Lobby Staff	2	2
Total	11	10

Program Manager Surveys: 7 Completed Surveys submitted

Case File Reviews (Total 130 Cases)

English speakers' case files reviewed	7
Non-English or limited-English speakers' case files reviewed	123
Languages of clients' cases	Spanish, Mixteco, Hmong, Arabic, Armenian, Punjabi, Russian, Lao, Vietnamese, ASL

Vendor Contract Review: 15 contracts reviewed to verify presence of required Assurance Of Compliance.

Welfare Fraud Case Review: 20 cases reviewed for documentation of language services.

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			
Does the county have extended hours to accommodate clients?	X			The office hours are not actually extended, but on a case-by-case basis, arrangements will be made.
Can applicants access services when they cannot go to the office?	X			Telephone interviews when permitted, online access or home visits will be provided.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Staff travel to more remote satellite offices; county website and collaboration with community

				organizations.
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Signage, Posters, Pamphlets	Yes	No	Some-times	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			
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, and Vietnamese?	X			If not physically present, staff state they would download any needed version from the internet.
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?	X			
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	X			
Were the current versions of the required posters present in the lobbies?	X			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			They were aware that posters were in the lobby areas.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated	X			In the sites reviewed, the only threshold language requiring translated signage is

Signage, Posters, Pamphlets	Yes	No	Some-times	Comments
into appropriate languages?				Spanish.

B. Corrective Actions: None Required

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 #1: West Fresno Regional Center; 142 E. California Street

Facility Element	Findings	Corrective Action
Parking	There was no signage to identify a van accessible space. Note: All dimensions and ground markings were in	One in every 8 accessible spaces (no fewer than 1) shall be designated van accessible. Additional signage with this

	place – only the sign was missing.	designation is required. (CA T24 1129B.3.2, ADA 4.1.2(5)(b))
Facility Element	Findings	Corrective Action
Building/Entrance	There is an automatic door opener for the building; however, an inner set of doors requires manual pressure to open. While in excess of the maximum 5 pounds of pressure for compliance with accessibility standards, the inner doors measured only 9 pounds of force to open. It appears DSS is active in its efforts to maintain appropriate accessibility.	2. Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)] <u>Recommendation:</u> Continue a regular maintenance of door pressure adjustments.
Lobby	There is an excellent accessible client counter in this lobby.	No corrective action called for. This is noted as an example of positive actions to provide accessibility and assistance.
Restrooms	Excellent facility accessibility, including soap dispensers with movement sensors and automatic toilet flush; however, door pressure exceeds the 5-pound maximum by a bit.	Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)] <u>Recommendation:</u> Establish a regular maintenance of door pressure adjustments.

Corrective Action: Signage added to designated van accessible space and door pressure adjustments completed in February, 2011.

Facility Location #2: "L" Street Children's Services, 1404 L St., Fresno

Facility Element	Findings	Corrective Action
Restroom	<p>1. The accessible facility was a unisex restroom, which is acceptable; however, the signage was not compliant:</p> <p>There was no wall signage designating the facility as a unisex accessible restroom.</p> <p>2. Door pressure for entering the restroom measured 12 pounds.</p>	<p>1. In addition to the international symbol centered on doors at a height of 60" above the floor (CA T24 1115B.5), signage for gender identification shall be installed on the wall adjacent to the latch outside of the door. If there is no space, the sign shall be placed on the nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7)</p> <p>2. Adjustments are necessary. Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]</p>

Corrective Action: Signage designating the restroom as unisex and accessible was ordered on July 12, 2011 and will be installed by the end of July, 2011. Door pressure was adjusted in February, 2011.

Facility Location #3: Sequoia Building, 3821 N. Clark St., Fresno

Facility Element	Findings	Corrective Action
Parking	The signage designating accessible parking spaces was missing the sign regarding minimum fines.	An additional sign below the international symbol of accessibility sign shall state "Minimum Fine \$250.00". (CA T24 1129B.4.1)
Building/Entrance	The door pressure measured approximately 12 pounds for entry into the building.	Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]

Restrooms	Door pressure to open the men's and women's accessible restrooms measured approximately 10 and 12 pounds, respectively.	Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]
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Corrective Action: Signage designating the minimum fine was installed on the accessible spaces in June, 2011. The door pressure was adjusted in February, 2011.

Facility Location #4: Selma Regional Center, 3800/3880 McCall St., Selma

Facility Element	Findings	Corrective Action
Parking	<p>1. There was no signage alerting drivers to penalties for unauthorized parking in accessible spaces.</p> <p>2. The signage designating accessible parking spaces was missing the sign regarding minimum fines.</p> <p>3. The words "No Parking" were not painted in access aisles for the</p>	<p>1. Additional signage shall be posted in a conspicuous place at entrance to off-street parking or adjacent to and visible from the designated accessible parking. This sign is to state "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away to owner's expense."</p> <p>2. An additional sign below the international symbol of accessibility sign shall state "Minimum Fine \$250.00". (CA T24 1129B.4.1)</p> <p>3. The words, "No Parking" shall be painted on the ground in each of the 5' or 8' loading</p>

	<p>designated accessible parking.</p> <p>4. There were no spaces designated as "Van Accessible".</p>	<p>and unloading access aisles in white letters no smaller than 12". (CA T24 1129B.3.2)</p> <p>4. One in every 8 accessible spaces (no fewer than one) shall be designated van accessible, which requires the loading and unloading access aisle to be 8' wide and on the passenger side of the vehicle. (CA T24 1129B.3.2 and 3.1; ADA 4.1.2).</p>
Facility Element	Findings	Corrective Action
Building Entrance	The amount of force required to open the entrance door measured approximately 17 pounds.	Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]
Lobby/Reception	The accessible window at the reception counter had only 7" of knee space for a person approaching in a wheelchair. The height of the counter top was within the 28" – 34" range, just the knee space is at issue.	Minimum seating knee space is 19". (CA T24 1122B.3; ADA 4.32.3)
Restrooms	<p>Both the soap dispenser and sanitary supply dispenser in the women's restroom were mounted too high (measured 48 inches from the floor).</p> <p>In the men's restroom, fixtures had been ripped</p>	When dispensing or disposal fixtures are provided, at least one of each type must be located with all operable parts at a maximum height of 40 inches. (CA T24 1115B.8.3, ADA 4.23.7)

	off the wall.	
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Corrective Action: The parking lot was restriped and proper signage installed in June, 2011. The door pressure was adjusted in February, 2011. A new ADA compliant counter in the lobby is scheduled to be installed in September, 2011. The restroom soap dispenser was adjusted to 40" in April, 2011.

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

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

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

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

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

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			At initial face-to-face contact or telephone contact. "I speak cards" are available to assist in identifying a language if needed.
Does the county use a				Form 2229 is used to identity

Question	Yes	No	Sometimes	Comments
primary language form?	X			primary language for both verbal and written communication.
Does the client self-declare on this form?	X			Every case record is to contain a signed Form 2229.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Through bilingual staffing, co-workers, contracted interpreters or the AT&T Language Line.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			Cases are generally assigned to bilingual workers, but resources listed above are available.
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			AT&T Language Line is provided.
Are county interpreters determined to be competent?	X			Bilingual staff are tested and certified by the agency.
Does the county have adequate interpreter services?	X			
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			When clients utilize their own interpreter, Form 2229-A is completed to document client's choice to decline agency

Question	Yes	No	Some-times	Comments
				interpreter and provide confidentiality release.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			When possible, the agency has a bilingual staff person present in addition to the client's interpreter.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			The clients are offered English or translated forms and their choice is accommodated.
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			The auxiliary aids are available but rarely called for according to staff. In the West Fresno site, speakers for audio Pub 13 are available.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			It is common practice for a third party (staff) to assist as necessary for this population.
Does the county offer screening for learning disabilities?	X			This offer and screening is available through Welfare To Work Employment Services.
Is there an established process for offering	X			It is a part of initial screening and assessment in WTW.

Question	Yes	No	Some-times	Comments
screening?				
Is the client identified as having a learning disability referred for evaluation?	X			According to staff this would occur... again in the work programs.

B. Corrective Actions: None Required

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. Location of this information in the case records is noted below.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	Adult Programs (IHSS)	CalWORKs Cash	Non-Assistance CalFresh
Ethnic origin documentation	Initial ER Referral	Application (Soc 295)	SAWS-1; CalWin	SAWS-1, DFA 285; Cal-Win
Primary language documentation	Initial ER Referral; Form 2229	Application (Soc 295) ; Form 2229	Form 2229; Cal-Win	Form 2229 Cal-Win
Method of providing bilingual services and documentation	Case narrative in CWS/CMS	Case Contact Log/Narrative	CalWin Journal (See comment at end of section)	CalWin Journal (See comment at end of section)
Client provided own interpreter	N/A (Agency provides interpreters)	Case Contact Log/Narrative; Form 2229-A	CalWin Journal; Form 2229-A	CalWin Journal; Form 2229A
Method to inform client of potential problem using own	N/A	Form 2229-I	Form 2229A	Form 2229-A

Documented Item	Children's Services	Adult Programs (IHSS)	CalWORKs Cash	Non-Assistance CalFresh
interpreter				
Release of information to Interpreter	N/A	Form 2229-A	Form 2229-A	Form 2229-A
Individual's acceptance or refusal of written material offered in primary language	Form 2229	Form 2229A	Form 2229 Cal-Win data fields reflect client choice	Form 2229 Cal-Win data fields reflect client choice
Documentation of minor used as interpreter	N/A	Would be in case narrative	Would be in case narrative	Would be in case narrative
Documentation of circumstances for using minor interpreter temporarily	N/A	Not documented	Not documented	Not documented
Translated notice of actions (NOA) contain translated inserts	N/A	Worker inserts information as needed	Only if not preprinted on automated notices	Only if not preprinted on automated notices
Method of identifying client's disability	Various - MS/CWS	Soc 295 and narrative	CalWin Journal	CalWin Journal
Method of documenting a client's request for auxiliary aids and services	Would be in worker narrative	Would be in case narrative	Would be in CalWin Journal	Would be in CalWin Journal

Additional Comments (Documenting by Bilingual Workers):

There was information gathered during interviews that indicated some bilingual workers are not aware of the need to document in the case record that they have provided the interpreter service to their clients. Because they are bilingual, they do not see that they are the interpreter as well and have not been trained to document in the case record that

they have conducted the interviews/meeting in the primary language of the client. This was validated in case file review.

This was a finding in the Cash and CalFresh programs.. Both the Children's and Adult (IHSS) program cases reflected consistency in documentation by bilingual workers.

Corrective Action: Staff was reminded that they must document interpreter services when they are a bilingual worker in a Program Staff Newsletter in July, 2011. This Newsletter is reviewed with staff by their supervisor, and verification of their attendance is tracked in the eSD6 program by DSS Staff Development and Training.

Review of Welfare Fraud Investigation Cases

The 2011 Civil Rights Compliance Review included a review of a sample of fraud investigation cases to determine the level of compliance with Division 21 documentation requirements related to the delivery of language services to non-English speaking or limited-English speaking clients during the investigation process. The cases reviewed were those of Spanish-speaking clients.

The reviewer found missing documentation related to the use of either bilingual investigative staff or other interpreters in the majority of the cases documentation in those cases that were reviewed, indicates that documentation requirements are not being met with respect to language services provided.

The Welfare Fraud Investigation Unit Chief was present during the review and understood the compliance issue. Immediate corrective action related to this finding was taken via correspondence to investigative staff, informing them of the documentation requirement. Follow up on this action is encouraged for inclusion in the corrective action plan to be prepared by the Civil Rights Coordinator for submission to CDSS in response to this report.

B. Corrective Actions

Areas of Action	Corrective Action
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

Corrective Action: It was confirmed with the Welfare Fraud Investigation Unit that documentation of the method used to provide bilingual services has improved on

July 8, 2011.

C. Review of Vendor Contracts A sample of vendor contracts was reviewed to assess the department's compliance with the requirement to provide the certification by vendors of their "Assurance of Compliance with the California Department of Social Services statement of Nondiscrimination in State and Federally Assisted Programs".

The reviewer found all of the contracts reviewed to be exceptionally well organized in standard format, which did include the required certification by vendors.

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			
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Interview questions	Yes	No	Some-times	Comments
Does the county provide employees Cultural Awareness Training?	X			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups	X			

receiving services in their area?				
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B. Corrective Actions: None required

C. Recommendation:

Either through staff development or supervisory oversight focus needs to be directed to the case documentation by bilingual workers regarding language service they provide in the course of their casework (e.g., interpreter service).

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			Most were able to articulate differences in the resolution processes for the complaints.
Did the employees know who the Civil Rights Coordinator is?	X			
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			They knew that a poster was in the lobby for the clients.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Corrective Action: None Required

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Fresno County Department of Social Services submitted their Civil Rights Plan update for 2010-2011 in accordance with requirements for its inclusion in the compliance review process. The plan is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the Fresno County Department of Social Services in satisfactory compliance with the CDSS Division 21 Regulations and other applicable state and federal laws.

The recent merger of two separate departments into a single social services department required substantial effort both organizationally and administratively. An interface of civil rights policies and procedures that differed between programs had to be implemented to ensure ongoing compliance under the single organization. Based on evidence from the 2011 compliance review, that interface was successful and the county is commended for their efforts. Staff training and oversight had to have been critical in that overall process.

The findings outlined in this report were discussed at the exit meeting which was attended by administrative staff. At that meeting, managers were advised of the excellent review and, in particular, the consistent professionalism in both process and product observed by this reviewer. Perhaps most visible was the consistency of effort by managers and staff to provide a service delivery system to the public that not only recognizes, but accommodates the differences in needs of the community. The corrective actions taken in response to prior reviews were in evidence through physical plant improvements in accessibility. There were some inconsistencies noted in this report, but overall, Fresno had an excellent review.

The documentation by bilingual workers as noted in the documentation section of this report remains an area of needed focus to ensure that all bilingual workers understand their responsibility to include documentation in the case record of their role in the delivery of language services to those non-English speaking clients they serve.

The Fresno County Department of Social Services must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.