



CDSS

WILL LIGHTBOURNE
DIRECTOR

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



EDMUND G. BROWN JR.
GOVERNOR

August 2, 2012

Luke Leung, Acting Director
Santa Clara County Social Services Agency
333 West Julian Street, 5th Floor
San Jose, CA 95110

Dear Mr. Leung:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office, Daniel Cervantes, during the course of the Civil Rights Compliance Review of Santa Clara County Social Services Agency. Enclosed is the final report on the review.

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 the analyst that conducted the review at Daniel.Cervantes@dss.ca.gov.

Sincerely,

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

Enclosure

c: Diane Von Merta, 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
CalFresh Policy Bureau

Thuan Nguyen
Refugee Programs Bureau

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

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

Jodie Berger, Regional Counsel
Legal Services of Northern California

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
Santa Clara County Social Services Agency
Conducted April 2012**

**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

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 Santa Clara Social 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 23, 2012 through April 26, 2012. An exit interview was held on April 26, 2012 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)
Santa Clara Benefits Assistance Center	1867 Senter Road, San Jose, CA	CalFRESH	Spanish
CalWORKS/Continuing	1870 Senter Road, San Jose, CA	CalWORKS	Spanish, Vietnamese
CalWORKS/Employment Services	1879 Senter Road, San Jose, CA	CalWORKs, Employment Services	Spanish
Family & Children's Services	373 W Julian, San Jose, CA	CWS	Spanish
Gilroy Outstation	379 Tomkins Ct, Gilroy, CA	CWS, CalWORKS/ES, CalFRESH	Spanish

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2011 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

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

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

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

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	2	1
Children Social Workers	4	3
Adult Program Workers	4	3
Receptionist/Screeners	4	4
Total	14	11

An additional 4 interviews were scheduled but were not conducted due to a miscommunication between analyst and Civil Rights Coordinator.

Program Manager Surveys

Number of surveys distributed	5
Number of surveys received	5

Reviewed Case Files

English speakers' case files reviewed	8
Non-English or limited-English speakers' case files reviewed	62
Languages of clients' cases	English, Spanish, American Sign Language, Farsi, Amharic, Vietnamese

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

Section IX 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 can meet by telephone or on a case by case basis at the client's home, work, or a mutually agreed upon location. In addition, clients may submit applications by fax, e-mail, apply via Benefits CalWIN, or use Access CalWIN.
Does the county have extended hours to accommodate clients?	X			County staff adjusts hours as needed on an individual basis to meet the client's needs.
Can applicants access services when they cannot go to the office?	X			

Does the county ensure the awareness of available services for individuals in remote areas?				Aside from the various offices throughout the county, Santa Clara County SSA does regular community outreach and often participates in health fairs.
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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 – 6/11)?			X	379 Tomkins has two lobbies. Upon entering, the lobby to the left offers CalFRESH and CalWORKS. The lobby to the right is the CalWORKS employment services lobby. The threshold language in this facility is Spanish. Receptionists on both sides had no idea what the PUB 13 was. The lobby which offers CalWORKS and CalFRESH did have the English version of the pamphlet, but not the Spanish. The CalWORKS ES lobby did not have PUB 13s available.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			The intake workers interviewed were all aware of the PUB 13 pamphlet and always explain it to the clients.
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,	X			The versions displayed by Santa Clara SSA was the most current version of the PUB 13.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Vietnamese?				
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		None of the offices visited had the PUB 13 in neither audio nor large print. *During the visit to Santa Clara SSA, the analyst made arrangements to provide the CRC with Braille versions of the PUB 13.
Were the current versions of the required posters present in the lobbies?		X		<p>1867 Senter Road, 1870 Senter Road, 1879 Senter Road, and 379 Tomkins all had the 2005 version of the PUB 86 poster.</p> <p>1867 Senter Road had the 1998 version of the And Justice for All poster.</p> <p>1879 Senter Road did not have the And Justice for All poster in the lobby.</p> <p>The CPS lobby upstairs at 379 Tomkins did not have the And Justice for All poster.</p>
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and		X		None of the 3 lobby receptionists at 379 Tomkins knew where

Signage, posters, pamphlets	Yes	No	Sometimes	Comments
address?				the CRC's information was located.
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			

B. Corrective Actions

Informational Element	Corrective Action Required
Translated Pub 13	Santa Clara County shall ensure that the current version of the Pub 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language. Div. 21-115.2
Auxiliary aids	Santa Clara County shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.4
Posters	Santa Clara 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

C. Recommendation

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

Pub 13	"Your Rights under California Welfare Programs"	06/11
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07

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: 379 Tomkins Ct, Gilroy, CA

Facility Element	Findings	Corrective Action
Parking	No "Minimum Fine \$250.00" displayed in accessible parking space.	For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the

	The words "NO PARKING" in access aisles are barely visible.	<p>symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133</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>
Outside signage	No sign with international symbol of accessibility at building's entrance.	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
Client lobby	Door pressure excessive at 12 lbs.	<p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</p> <p>Force to open fire door, minimum allowable not to exceed 15 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(1)) p 207</p>
Restroom	<p>Men's:</p> <p>Door pressure excessive at 9 lbs.</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</p> <p>Force to open fire door, minimum allowable not to exceed 15 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(1)) p 207</p>

C. Facility Location: 373 W Julian, San Jose, CA

Facility Element	Findings	Corrective Action
Parking	No "Minimum Fine \$250.00" displayed in accessible parking space.	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
Restroom	Unisex Restroom in visitation and observation area missing door signage designating restroom as wheelchair accessible.	<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>

D. Recommendation

None

E. Facility Location: 1867 Senter Road, San Jose, CA

Facility Element	Findings	Corrective Action
Restroom	Men's and Women's: No wall mounted sign	Door sign and wall sign shall be

	designating restroom as wheelchair accessible.	<p>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>
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F. Recommendation.

None

G. Facility Location: 1870 Senter Road, San Jose, CA

Facility Element	Findings	Corrective Action
Exterior entrance	Door pressure excessive at 9 lbs.	<p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</p> <p>Force to open fire door, minimum allowable not to exceed 15 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(1)) p 207</p>
Restroom	<p>Men's and Women's:</p> <p>Door pressure excessive at 11 lbs.</p>	Force to open doors, exterior and interior is 5 pounds

		<p>maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</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 207</p>
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H. Recommendation

None

I. Facility Location: 1879 Senter Road, San Jose, CA

Facility Element	Findings	Corrective Action
Exterior entrance	<p>Entrance at Employment Connection area of the building:</p> <p>Door pressure excessive at 25 lbs.</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</p> <p>Force to open fire door, minimum allowable not to exceed 15 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(1)) p 207</p>
Restroom	<p>Men's:</p> <p>Pipes under sink not insulated.</p>	<p>Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.4.7.1, ADA 4.24.6) p 343</p>

J. Recommendation

None

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			Information regarding the client's language is found on the Saws1, SCD 1264, or by simply asking the client depending on the program.
Does the county use a primary language form?	X			Several language forms were found throughout the programs reviewed in the county. SCD 1264, SCZ 1649, and SCZ 203.
Does the client self-	X			The client is required to sign the

Question	Yes	No	Some-times	Comments
declare on this form?				form. *It should be noted that there were many forms filled out, but not signed by the client.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Santa Clara County makes a solid effort to match the client with a worker that speaks their language. If not, workers know how to use the language line effectively.
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			See comments above.
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			Santa Clara County uses both a language line and a county interpreter list. When an LEP client requires services, Santa Clara County is able to accommodate them.
Are county interpreters determined to be competent?	X			Bilingual county employees must be certified.
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?	X			Minors have been used to schedule/reschedule appointments, but they are typically not used.
Does the county allow the client to provide his or her own interpreter?	X			When Santa Clara County clients used their own interpreters, workers were not documenting these

Question	Yes	No	Some-times	Comments
				occurrences. Further, clients were not completing the release of information form required by Division 21.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			
Does the county use the CDSS-translated forms in the clients' primary languages?	X			Most of the cases reviewed were in Spanish, but in all of these instances, the CDSS form(s) were sent out in the client's primary language.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			Most of the cases reviewed were in Spanish, but in all of these instances, the information inserted into the NOAs were all in the client's primary language.
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			If a client required assistance reading/writing, the county worker was able to provide that service.
Does the county offer screening for learning disabilities?	X			

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

B. Corrective Actions

Client provided interpreters/release of information	<p>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 documents in the case record that the applicants/recipients were so informed. Div. 21-116.23</p> <p>Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are sued as interpreters and the case record shall be so documented. Div. 21-116.24</p>
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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	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	Soc 1649 Soc 225 Soc 203	Saws1 SCD 1264	Saws1 SCD 1264

Documented Item	Children's Services	CalWORKs & Employment Services	Non-Assistance CalFresh
Primary language documentation	Soc 1649 Soc 225 Soc 203	Saws1 SCD 1264	Saws1 SCD 1264
Method of providing bilingual services and documentation	Case narrative	CalWIN case file notes	CalWIN case file notes
Client provided own interpreter	Case narrative *None found	CalWIN case file notes	CalWIN case file notes
Method to inform client of potential problem using own interpreter	Case narrative *None found	CalWIN case file notes *None found	CalWIN case file notes *None found
Release of information to Interpreter	Case narrative *None found	CalWIN case file notes *None found	CalWIN case file notes *None found
Individual's acceptance or refusal of written material offered in primary language	Case narrative	CalWIN case file notes	CalWIN case file notes
Documentation of minor used as interpreter	Case narrative	CalWIN case file notes	CalWIN case file notes
Documentation of circumstances for using minor interpreter temporarily	*None found	CalWIN case file notes *None found	CalWIN case file notes *None found
Translated notice of actions (NOA) contain translated inserts	N/A	CalWIN case file notes	CalWIN case file notes
Method of	Case narrative	CalWIN case file	CalWIN case file

Documented Item	Children's Services	CalWORKs & Employment Services	Non-Assistance CalFresh
identifying client's disability		notes	notes
Method of documenting a client's request for auxiliary aids and services	Case narrative	CalWIN case file notes	CalWIN case file notes

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
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/recipient's 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	Santa Clara County must ensure that proper

Areas of Action	Corrective Action
	documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

C. Recommendation

Santa Clara County has done an above average job in documenting the services provided across all programs. In the past, more than one Language Preference Form was used to document the client's primary language. It should be noted that Santa Clara County did an exceptional job of having clients self designate their primary language using form SCD 1264. This form, when used as it was intended, fulfills the Division 21 requirements. But, the form must be followed up by coinciding case notes and filled out properly.

The reviewer also noticed that some of the case narratives were completed using a template. Although a template is not required, it has typically been more effective because it requires the county worker to fill out/answer all of the questions. If an effective template is created and is used by all county workers, that typically improves the documentation in the case files significantly.

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			Training is mandatory upon hire as well as regular refresher trainings given by the CRC every 12-18 months.
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			Training is offered at the same time Div 21 training is offered.
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions

None

VIII. DISCRIMINATION COMPLAINT PROCEDURES

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

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?			X	Only half of the employees interviewed over the phone (and 3 employees I spoke with while visiting the county) were able to differentiate between all 3 types of complaints.
Did the employees know who the Civil Rights Coordinator is?	X			Santa Clara County staff all know who the CRC is and how to contact her.

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		Only 4 employees interviewed knew where the Civil Rights Poster was located in the lobby. The rest of the staff interviewed, including all of the receptionists at the facilities visited, had no idea there was a civil rights poster in the lobby.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Corrective Action

Element	Corrective Action
Discrimination Process	Santa Clara County shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Santa Clara County Social Services Agency Civil Rights Compliance Plan for the period December 1, 2010 through November 30, 2011, was received in June 2011. It is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the Santa Clara County Social Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Ms. Lisa Holmes, Civil Rights Coordinator, for organizing the details of the review. In each District Office, staff was very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Santa Clara County Social Services Agency in substantial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

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

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