



CDSS

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**DEPARTMENT OF SOCIAL SERVICES**  
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EDMUND G. BROWN JR.  
GOVERNOR

August 29, 2012

Susan Loew, Director  
Riverside County Department of Public Social Services  
4060 County Circle Drive  
Riverside, CA 92503

Dear Ms. Loew:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office, Mary Rockwood, during the course of the Civil Rights Compliance Review of June 18-21, 2012. 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 enclosed 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, both documents 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 Ms. Elsa Garcia, of my staff at (916) 654-2110. You may also contact her by e-mail at [Elsa.Garcia@dss.ca.gov](mailto:Elsa.Garcia@dss.ca.gov).

Sincerely,

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

Enclosure

c: Hilary Brown, Civil Rights Coordinator

Linda Patterson, Branch Chief  
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Mike Papin, Chief  
CalFresh Policy Bureau

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR  
RIVERSIDE COUNTY  
DEPARTMENT OF PUBLIC SOCIAL SERVICES**

**Conducted June 18-21, 2012**

**California Department of Social Services**

**Human Resources Management Division**

**Civil Rights Bureau**

**744 P Street, MS 15-70**

**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 Riverside County Department of Public Social Services (DPSS) 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.

Interviews with selected public contact staff were held by telephone prior to the on-site review, which was conducted on June 18-21. An exit interview was held with administrative staff on June 21, 2012

The 2012 review was conducted in the following locations:

<b>Facility</b>	<b>Address</b>	<b>Programs Reviewed</b>	<b>Languages spoken by a substantial number of clients</b>
Jurupa	5961 Mission Blvd., Riverside	CalWORKS; CalFresh; IHSS	English & Spanish
Norco	3178 Hamner Ave. Norco	CalWORKS; CalFresh	English & Spanish
Temecula	43264 Business Park Dr., Temecula	CalWORKS; CalFresh	English & Spanish
Moreno Valley	23119 Cottonwood Building A Building C	CPS & IHSS  CalWORKS; CalFresh	English & Spanish

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

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

- Reviewed the 2012-2013 Annual Civil Rights 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.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Case file reviews
- Facility inspections
- Review of Revised Format/Content for Vendor Contracts
- Accessibility Review of State Hearings Site (Reynolds Road)

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

#### **Interviews Conducted with Public Contact Staff**

<b>Classifications</b>	<b>Total</b>	<b>Bilingual</b>
Eligibility Technician	8	(8)
Office Assistant	4	(3)
Social Worker	3	(3)
<b>Total</b>	<b>15</b>	<b>(14)</b>

#### **Case File Review (Total 91 cases)**

English speakers' case files reviewed	6 + 5 ASL
Non-English or limited-English speakers' case files reviewed	80
Undocumented/Unable to determine	0
Languages of non-English cases	Spanish, Vietnamese, Arabic, Lao, Farsi, Mandarin, Korean, Tagalog, Cambodian, Armenian.

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. Any required corrective actions are stated at the end of each section.

Section IX of the report presents the result of the annual plan review.

Section X of the report presents the findings of the hearing site accessibility review.

Section XI provides a summary conclusion of the review and the agency's compliance status.

### 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?	X			Clients are generally able to access services during the normal hours due to the early 7:00 a.m. opening of most offices. Mail, telephone and home visits are additional alternatives in some situations.
Does the county have extended hours to accommodate clients?	X			Business hours generally included the 7:00 a.m. hour (or 7:30).
<b>Access to Services, Information and Outreach</b>				
Can applicants access services when they cannot go to the office?	X			Alternatives include access via the telephone, mail and home visits, as well as electronic web access.
Does the county ensure the awareness of available services for individuals in remote areas?	X			DPSS maintains a website for public information and participates in a variety of community functions and collaborative efforts with community based organizations to share information on available services.

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs"?	X			The pamphlet is an established part of the intake and annual packets for Self Sufficiency and IHSS programs. The pamphlet is also used in CPS, with routine distribution in the ER and as appropriate in other programs.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			In Self-Sufficiency programs and IHSS, distribution is made routinely and discussion held with clients in conjunction with the rights and responsibility discussions. In CPS, the pamphlet is given at initial contact in the ER program and with new foster home placements.
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Armenian and Cambodian?	X			
Was the Pub 13 available in large print, audiocassette and Braille?	X			The alternative formats were maintained by reception staff in the lobby.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
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			Translated instructional and informational material was excellent; Spanish information was readily provided.

**B. Corrective Actions:** None required.

#### **IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**

The Americans with Disabilities Act 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 ADAAG in the Corrective Action column refers to the federal Standards for Design, and the Title 24 of California Code and Regulations (T24 CCR) are also cited because there are instances when California state law is more stringent 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.

### A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR), and Americans with Disabilities Act Accessibility Guidelines (ADAAG).

#### Facility Location # 1: Jurupa Self Sufficiency District, 5961 Mission Blvd., Riverside

Facility Element	Findings	Corrective Action
Restrooms	1. Door pressure to open doors measured at: (Men's = 12 lbs.; Women's = 12 lbs.)	1. Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]

#### Facility Location # 2: Temecula Self Sufficiency District, 43264 Business Park Dr.

Facility element	Findings	Corrective Action
Parking	<p>1. There is only one designated accessible parking space. (Need 2)</p> <p>2. Pavement markings were so faded that visibility is limited</p> <p>3. Additional signage below freestanding symbol signage noting fine assessment was missing.</p> <p>4. The words "No Parking" were not painted in the access aisle.</p>	<p>1. For every 25 general parking spaces, one accessible space is required. (CA T24 1129B.1; ADA 4.1.2(5)(a))</p> <p>2. Pavement signage shall be 36"x36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.1 &amp; 2)</p> <p>3. Additional sign below the symbol sign shall state "Minimum Fine \$250.00. (CA T24 1129B.4.1)</p> <p>4. The words "No Parking" shall be painted on the ground in each loading/unloading access aisle in white letters no smaller than 12" (CA T24 1129B.3.2)</p>

Facility element	Findings	Corrective Action
	5. Access aisle for the designated accessible space does not connect to an accessible path of travel to the sidewalk (curb extends into path of travel); Walkways minimum 48".	5. Access aisles must connect to the accessible path of travel, including curb cuts or ramps as needed. (CAT24 1129B.3.3, ADA 4.6.3; (CA T24 1133B.7.1)
Building Entrance	Door pressure measured at 18 lbs.	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	<p>1. Door pressure for entering restrooms measured approximately 10 lbs. (Both Men's &amp; Women's)</p> <p>2. Toilet seat protectors mounted on back wall too high and behind toilets. (Both Men's and Women's)</p>	<p>1. Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)]</p> <p>2. 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)</p>

**Facility Location # 3: Norco Self Sufficiency District 3178 Hamner Ave.**

Facility element	Findings	Corrective Action
Parking	<p>1. The signage designating accessible parking spaces was missing the sign regarding minimum fines.</p> <p>2. Both ground painting and Van Accessible sign so faded as to render it "not visible".</p> <p>3. Route/path from parking space to main door has obstructions (free standing sign and in-ground landscape plant)</p> <p><u>NOTE:</u> An alternative route is available, but no signage directing individuals to the walkway. This route has a 21 foot long ramp with no railings (slope from 4.8 to 7.5 degrees)</p>	<p>1. An additional sign below the international symbol of accessibility sign shall state "Minimum Fine \$250.00". (CA T24 1129B.4.1)</p> <p>2. Pavement signage shall be 36"x36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.1 &amp;2)</p> <p>3. Safe continuous uninterrupted path with 48" width is to serve the building. (CA T24 1133B.7.1)</p> <p>Ramps longer than 6' shall have hand railings on both sides. (CA T24 1133B.5.5.1, ADA 4.8.5(1))</p>
Lobby/Reception	<p>1. The height of the information (greeter) window in reception measured 42 ½ inches from the floor.</p>	<p>1. Height of accessible tables or counters is to be between 28-34" from the floor. (CA T24 1122B.4, ADA 4.32.4)</p>
Restrooms	<p>Door pressure for entering restrooms measured approximately at 10 lbs. (Both Men's &amp; Women's)</p>	<p>Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)]</p>

**Facility Location # 4: Moreno Valley, Bldg, A, 23119 Cottonwood**

Facility element	Findings	Corrective Action
Parking	<p>1. Pavement markings were so faded that visibility is limited</p> <p>2. Neither of the 2 designated accessible parking spaces were Van Accessible</p> <p>3. The signage designating accessible parking spaces was missing the sign regarding minimum fines</p>	<p>1. Pavement signage shall be 36"x36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.1 &amp;2)</p> <p>2. 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> <p>3. Additional sign below the symbol sign shall state "Minimum Fine \$250.00. (CA T24 1129B.4.1)</p>
Restrooms	<p>1. There was no wall signage for the women's accessible restroom.</p> <p>2. Door pressure for entering restrooms measured approximately 27 lbs. for the women and 17 lbs. for the men.</p> <p>3. Dispensers for toilet seat covers were mounted 60" from the floor.</p>	<p>1. The sign shall be installed on the wall adjacent to the latch outside of door. If no space, the sign shall be placed on the nearest wall, preferably on the right.</p> <p>2. Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)]</p> <p>3. 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)</p>

**Facility Location #5: Moreno Valley, Building C, 23119 Cottonwood**

Facility element	Findings	Corrective Action
Parking	<p>1. Pavement markings were so faded that visibility is limited</p> <p>2. The signage designating accessible parking spaces was missing the sign regarding minimum fines</p>	<p>1. Pavement signage shall be 36"x36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.1 &amp;2)</p> <p>2. Additional sign below the symbol sign shall state "Minimum Fine \$250.00. (CA T24 1129B.4.1)</p>
Lobby	Excellent accessibility provided with designated reception window and expedited processing for anyone with special needs.	
Restrooms	Door pressure measured approximately 10 pounds for women's restroom and 12 pounds for men's.	Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]

**Accessibility Review of Administrative Hearing Site – 3950 Reynolds Rd., Riverside**

There were two findings that impact accessibility at this site: parking location and building access (entrance door). Discussion was held with the administrator responsible for the Reynolds Road hearing site, as she accompanied the reviewer throughout the review.

**Parking**

Current designated accessible parking is located on the far side of the building, farther away from the entrance than if provided at the first driveway entrance. There is signage directing the public to that existing parking, but it is not visible as one approaches the building's first driveway. It was decided that the best alternative would be to move the designated accessible spaces to the near side of the building (at the first driveway).

## Building Access

The amount of force required to open the entrance door measured approximately 25 pounds and the design of the door does not allow it to be opened with a closed fist. This finding basically renders this site non-accessible. It was reported to this reviewer that the issue of the door/entrance is already being addressed, with a recommendation put forth to install an automatic opener.



There are three hearing rooms at the site, with two of them totally accessible. Agreement was made to label (with appropriate ISA signage) one as the designated accessible hearing room to be utilized as appropriate for individuals needing accommodations.

### **Corrective Action Recommended:**

- Move the designated accessible parking to the first entrance driveway
- Provide access to the building by automatic opener

## **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 (TDDs), 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 be in the individuals' primary language.

### **A. Findings from 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?	X			Each facility is staffed with bilingual Spanish-speaking reception staff and The GEN 1365, Notice of Language Services, is available to staff in determining language service needs. NOTE: Only some offices had the sign "Interpreter Available" displayed. This sign allows a customer to point to his/her language to assist in communication with reception staff as well as inform him/her of interpreter availability.

Question	Yes	No	Some-times	Comments
Does the county use a primary language form?	X			Form 3167, Declaration of Language/Special Needs, is in use. It was noted that improvement has been made in the use of the most current revision of this form. (In prior years, staff were using obsolete versions that did not include essential information on the offer of translated written material.) There were still some staff who used obsolete forms, but a noticeable improvement in this area.
Does the client self-declare on this form?	X			Staff indicates that clients provide the information either written on the form or verbally during interview.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Existing DPSS policy provides for verbal bilingual services to be provided (Policy # 29-4). Bilingual staffing provides excellent verbal bilingual services for the Spanish-speaking clients, which represent the vast majority of the non-English-speaking population.  According to staff, when other languages are spoken, it is often the preference of clients to provide their own interpreters. If needed, other county bilingual staff or a contract interpreter service is utilized.
After it has been determined that the client is limited-English or non-English speaking, what is the county process for procuring an interpreter?	-	-	-	For Spanish-speaking clients, bilingual workers are generally assigned. That also occurs with other languages if there are bilingual workers on staff. When bilingual workers are not available in a given office, DPSS staff first utilizes a county listing of other bilingual staff seek their assistance.  When no county bilingual staff can be located, a contract interpreter service is utilized to secure an interpreter.

Question	Yes	No	Sometimes	Comments
Is there a delay in providing services?			X	According to staff, there may be delays in accessing contract interpreters, which may be why some clients choose to provide their own interpreters when bilingual staff are not available in a specific language. However, they report that this is an exception and there is generally no delay in service.
Does the county have a language line provider, a county interpreter list, or any other interpreter process?		X		This service has been discontinued.
Are county interpreters determined to be competent?	X			Bilingual workers are tested and certified by the agency.
Does the county have adequate interpreter services?	X			At the present time, Spanish-speaking clients represent the vast majority of the non-English speaking population and sufficient bilingual staffing is in place. The combination of the county listing and contract interpreter service appears adequate for other languages.
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			According to staff, it is common for clients to bring someone with them to serve as an interpreter if their primary language is other than English or Spanish.

Question	Yes	No	Some-times	Comments
Does the county use the CDSS-translated forms in the clients' primary languages?	X			Spanish forms are readily available, and were found in the cases reviewed. There was indication from staff during interview that only English and Spanish forms were kept in stock, but they knew how to retrieve translated forms from the intranet as needed. Reportedly, it was common for clients who may speak in another primary language, to request written material in English. This was observed during the case file review (Form 3167).
Is the information that is to be inserted into Notices of Action translated into the client's primary language?	X			If the standard form is not sufficient, additional information is inserted.
Does the county provide auxiliary aids and services, telecommunication devices for the deaf (TDDs) and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials?	X			<p>Several staff, however, indicated passing notes would be the method of initial communication at the reception window with the hearing impaired client, but workers had access to ASL interpreters for their casework communications. (ASL interpreters are available and cases in the sample had excellent documentation of their role as interpreters.)</p> <p>According to staff, the primary means to assist visually impaired clients would be to have a third party assist them by reading and signing documents for them. Some also mentioned magnifying glasses and enlarging print on the copy machine or computer for them.</p>

Question	Yes	No	Some-times	Comments
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			In the course of processing, staff assist those clients who cannot read or write by reading to them and helping with the completion of forms.
Does the county offer screening for learning disabilities?		X		Screening does not occur in the programs included in this review. Reportedly, this occurs in GAIN.
Is there an established process for offering screening?	X			The offer is made as part of the initial assessment process in GAIN.
Is the client identified as having a learning disability referred for evaluation?	X			Further testing and evaluation is provided when appropriate.

### **Additional Discussion**

Riverside DPSS revised the Form 3167 as part of a prior year's corrective action to address the Division 21 requirement to offer translated forms to clients with a primary language other than English and to document client acceptance or refusal of that offer.

Based on findings during the case file review, noticeable improvement has been made in worker use of the current Form 3167, Declaration of Language/Special Needs. However, it appears that some staff still utilizes prior versions of the form which do not fully comply with Division 21 requirements. The older versions of the form did not include the section where translated written forms are offered. Thus, there is no record that such an offer was made in those cases.

Continued oversight and training of staff is necessary to ensure that the current updated version of the Form 3167 is utilized by all workers.

- B. Corrective Actions:** None required; however it is recommended that the "Interpreter Available" sign be displayed in each lobby, along with the existing sign (with the International Symbol of Accessibility) that has been provided to inform the public of available assistance to those with special needs.

## 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: Additional discussion follows this display of information.

Documentation Item	Cal WORKs	CalFresh	IHSS	CPS
Ethnic Origin	SAWS 1 + Form 3167	DFA 285 A1+ Form 3167	Soc 295 +Form 3167	Initial ER Referral
Primary language	SAWS 1 & Form 3167	DFA 285 & Form 3167	Soc 295 + Form 3167	Initial ER Referral
Method of providing bilingual services	(See discussion following table display of findings.)  Documentation is to be in C-IV journal narrative and on Form 1764, Customer Contact Communication Record.	(See discussion following table display of findings.)  Documentation is to be in C-IV journal narrative and on Form 1764, Customer Contact Communication Record.	The case narrative comments were well documented when interpreters were utilized.	Case contact notes and miscellaneous documents, such as investigative summary reports and court recordings.
Client provided own interpreter	C-IV Journal entry	C-IV Journal entry	Case Narrative	CPS does not utilize client interpreters.
Method to inform client of potential problem of ineffective communication using own interpreter	Policy is to use a Form 3810 along with such a discussion; however, it appears not to be in practice.	Policy is to use a Form 3810 along with such a discussion; however, it appears not to be in practice.	Form 3810 is in use and staff indicate that verbal discussion is held.	N/A

<b>Documentation Item</b>	<b>Cal WORKs</b>	<b>CalFresh</b>	<b>IHSS</b>	<b>CPS</b>
Release of information to Interpreter	Form 3810	Form 3810	Form 3810	N/A
Individual's acceptance or refusal of written material offered in primary language	Form 3167	Form 3167	Form 3167	No procedures in place
Translated NOAs contain translated inserts	Workers must insert when C-IV does not print necessary detail	Workers must insert when C-IV does not print necessary detail	Workers must insert when standard form does not provide necessary detail	N/A
Documentation of minor used as interpreter	C-IV Journal (if it occurs)	C-IV Journal (if it occurs)	Case Contact Summary	N/A
Method of identifying client's disability	Observation, Discussion or Form 3167	Observation, Discussion or Form 3167	Observation Discussion or Form 3167	Observation, Discussion
Method of documenting a client's request for auxiliary aids and services	Form 3167/Narrative	Form 3167/Narrative	Form 3167/Narrative	Case contact log would be used if request were received.

### **Additional Comments:**

There was much improvement in the documentation by workers when interpreter service was provided by bilingual caseworker; however, some inconsistency remained. Two specific efforts are noteworthy to mention as evidence of the administration's commitment

to improving required documentation:

- Mandatory use of the Form 1764, Customer Contact Communication Record  
Workers are now required to complete this form, which records specific information related to the provision of language services or other assistance provided to customers with special needs. This documentation is to become standard for all cases, including those handled by bilingual workers and supplements the journal narrative entries.
- Development of a standardized template for C-IV journal entries  
There is a team developing a standardized template for use by workers when they prepare journal entries at intake and annual reviews. The template covers several casework topics, the first of which is Civil Rights and language proficiency/interpreter services.

The mandatory use of the Form 1764 was just recently implemented prior to the 2012 compliance review; therefore, many of the cases in the random sample utilized for documentation review did not contain this document (or it had not been imaged into the C-IV system yet). At the exit meeting, it was acknowledged that the findings (where no documentation was found), may have been impacted by this factor.

The documentation related to the offer of translated written forms in the individual's stated primary language is still missing in cases where obsolete versions of the Form 3167, Declaration of Language/Special Needs. This was improved since the last review, but is included for corrective action in order to establish full compliance with this Division 21 requirement.

## B. Corrective Actions

Areas of Action	Corrective Action
Documentation that bilingual services were provided (Interpreters)	Riverside County DPSS must ensure that all staff 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
Documenting Offer of Translated Written Material/Forms	DPSS needs to provide additional instruction to the staff in the use of the correct version of Form 3167 since that is the method adopted to document the offer of translated material made to non-English speaking/limited-English

Areas of Action	Corrective Action
	<p>speaking clients.</p> <p>CPS workers need to implement use of the Form 3167 or provide alternative documentation of their offer of translated material. Documentation of such an offer is required in all programs. ( Div. 21-116.21 )</p>

## 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		Staff receive civil rights training as new employees (Induction Training), however, those interviewed indicated there is no ongoing training requirement for civil rights.
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			
Do the employees seem knowledgeable about the cultural groups receiving services in their area?	X			In many of the offices, the diversity is limited (basically only Spanish). But in some of the offices there is wider diversity, and staff are

				knowledgeable of those cultures they serve.
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Additional Discussion:

Reminders or key civil rights topics are now being sent out periodically to staff in the form of "E-Blasts" from the Civil Rights Office to provide some form of ongoing civil rights information. During interviews, some of the staff mentioned those E-Blasts when asked about training they receive. It appears to be an effective tool to remind workers of their responsibility related to civil rights (in addition to distribution of the Civil Rights Pamphlets).

The Civil Rights Office has also developed training modules for Staff Development to utilize in the development of actual "sit down" classroom training as part of a regular ongoing mandatory training requirement for workers.

Staff Development representatives were in attendance at the exit and are aware of the Division 21 requirement for a regular ongoing training program for civil rights.

**B. Corrective Actions**

<b>Areas of Action</b>	<b>Corrective Action</b>
Ongoing civil rights training	Each public contact employee shall receive training in the requirements of Division 21. These requirements of Division 21 shall be incorporated into the content of orientation and continuing training programs. Div. 21- 117.1

**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. The Civil Rights Coordinator primarily uses this log once complaints get to him/her.

### 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	Some of the staff did not seem to distinguish between the processes for fair hearings on program issues and a separate process for addressing civil rights 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	Some had a general idea that such a poster was in the lobby area, but were not aware of its content.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	-	-	-	The complaint log was current and provided to the reviewer for reconciliation with CDSS data base information.

**B. Corrective Action:** Ongoing Civil Rights/Division 21 training discussed in the prior section on Staff Development should include discussion of the differences in types of client complaints and the processes to resolve those complaints.

### IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The 2012-2013 Civil Rights Plan was submitted, reviewed and approved as submitted..

In Section 1 of the plan, provision has been made for the Assurance of Compliance Statement to be obtained from each contractor providing additional services to RCDPSS customers.

In response to the findings in last year's Civil Rights Compliance Review, corrective action was taken by DPSS to bring the agency into compliance with this provision. The required Assurance of Compliance is now a standard part of all current contracts.

## **IX. CONCLUSION**

Riverside County Department of Public Social Services (DPSS) was found to be in substantial compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 regulations, and other applicable state and federal civil rights laws. As noted in various sections of this report, corrective action efforts implemented in response to prior reviews were in evidence – most significantly in case documentation and contractor assurance of compliance.

Failure of bilingual staff to provide documentation of language services has been discussed each year at the exit meetings and presented in the written reports, yet it continued to be a major finding each year. In the 2012 compliance review, there were still some cases not appropriately documented; however, the consistency of cases reflecting compliance in documentation requirements was noticeable. DPSS is commended for the effort in this area.

Another repeat finding (and again in 2012) is the absence of an ongoing staff development requirement for civil rights training. The Civil Rights Office is working with Staff Development to develop some ongoing training and, in the interim, has developed what appears to be an effective "E-Blast" electronic reminder to staff on civil rights topics.

A new component of the Compliance Review initiated in the 2012 review year is the accessibility review of the hearing sites where fair hearings are held. This review is now included as a standard part of Civil Rights Compliance Reviews in order to assure appropriate compliance with requirements for client accessibility to these facilities. Riverside DPSS was found to have compliance issues with accessibility at the Reynolds Road hearing site – related primarily to the building entrance door. Discussion of the findings are presented in Section IV of this report.

Riverside County DPSS must remedy the violations 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 by which all actions will be taken to correct the violations. It will be important that supervisory oversight be incorporated in the ongoing corrective actions to reduce the continuing pattern or repeat findings.

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.