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DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

September 17, 2012

Michael L. Riley, Ph.D., Director
Orange County Social Services Agency
888 N. Main Street
Santa Ana, CA 92701

Dear Dr. Riley:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office, Cindy Guzman, during the course of the Civil Rights Compliance Review of July 23 – 27, 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 60 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, these reports 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 Cindy Guzman at (916) 654-2117, or by e-mail at cindy.guzman@dss.ca.gov.

Sincerely,

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

Enclosure

c: Lisa Tamres , Program Integrity Manager/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
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
Orange County Social Services Agency**

**Conducted on
July 23 – 27, 2012**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
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(916) 654-2107**

Cindy Guzman

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Orange County 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 July 23 – 26, 2012. An exit interview was held on July 27, 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)
North Region	3320 E. La Palma Avenue. Anaheim, CA 92806	CalWorks, CalFresh, WTW	Spanish, Vietnamese
Manchester Office	301 The City Drive South, Bldg. #44 Orange, CA 92868	Children & Family Services	Spanish
North Region Sand Dollar	1240 S. State College Blvd. Anaheim, CA 92806	CalWorks	Spanish
Central Regional Center	2020 W. Walnut Street Santa Ana, CA 92703	CalFresh	Spanish
East Region Hearing Office	1928 S. Grand Ave. Santa Ana, CA 92705	Hearings Room ADA Review (Only)	N/A

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2010 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	7	5
Children Social Workers	4	3
Receptionist/Screeners	4	3
Total	15	11

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	13
Non-English or limited-English speakers' case files reviewed	73
Total Case Files Reviewed	86
Languages of clients' cases	English, Spanish, Vietnamese, Arabic, Romanian, Farsi

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

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

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

III. DISSEMINATION OF INFORMATION

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

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			County accommodates clients through their early and later hours if needed.
Does the county have extended hours to accommodate clients?	X			County accommodates clients through their early and later hours if needed.

Can applicants access services when they cannot go to the office?	X			Through home visits, telephone, web-based system. In the CalWORKs Program workers are able to make home calls, or do site visits to place of employment if needed. Clients are able to apply for CalFresh or CalWORKs Programs through e-application. A face to face interview is still required for the CalWORKs program.
Does the county ensure the awareness of available services for individuals in remote areas?	X			The County ensures awareness through Community Resource Centers, the County Website, and Community Programs.

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			
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, Ukranian, and Vietnamese?	X			The county has a good display of the current version of Pub 13 in all languages.
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?	N/A			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
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			
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
None

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

Pub 13	"Your Rights under California Welfare Programs"	06/11
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact the Civil Rights Bureau to receive the most recent versions, or download the Pub 13 from the CRB website http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

1. Facility Location: North Region, 3320 E. La Palma Avenue, Anaheim, CA

Facility Element	Findings	Corrective Action
Parking	Additional signage below the symbol of accessibility stating "Minimum Fine \$250" needed on only one accessible parking space across from the building.	An additional sign or additional language below the symbol sign of accessibility shall state "Minimum Fine \$250" (CA T24 1129B.4) p 134

Men's Restroom	Door pressure too high at 15 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207
Women's Restroom	<p>Accessible signage on door too high at 67" above the floor to the center line of sign.</p> <p>Door pressure too high at 9 lbs. (outside door) 7 lbs. (inside door).</p>	<p>Door sign and wall sign shall be 60" above the floor to the center line of sign.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7) (ADA 4.30.6) p 287</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 287</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207</p>
Emergency egress	Emergency Alarm is audible, but is not also visual. However, the county does have an evacuation plan in which they go through the building to ensure all	<p>If emergency warning systems are provided, they should include both audible alarms and visual alarms.</p> <p>If emergency warning systems are required, they shall activate</p>

	clients are escorted out in an emergency.	<p>a means of warning the hearing impaired.</p> <p>(CA T24 1114B.2.2, ADA 4.28.1) p 242</p>
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2. Facility Location: Manchester Office, 301 The City Drive South, Bldg. #44, Orange, CA

Facility Element	Findings	Corrective Action
Parking	<p>Additional signage below the symbol of accessibility stating "Minimum Fine \$250" needed on all accessible parking.</p> <p>"No Parking" painted on pavement needed on all accessible parking access aisles.</p>	<p>An additional sign or additional language below the symbol sign of accessibility shall state "Minimum Fine \$250" (CA T24 1129B.4) p 134</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.3.1) p 136</p>
Men's Restroom	<p>Door pressure too high at 9 lbs.</p> <p>Soap dispenser too high at 55" at operable part.</p>	<p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures</p>

		are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.1.1) (ADA 4.19.6) p 296, 299, 304
Women's Restroom	<p>Door pressure too high at 9 lbs.</p> <p>Soap dispenser too high at 43" at operable part.</p>	<p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.1.1) (ADA 4.19.6) p 296, 299, 304</p>

3. Facility Location: North Region Sand Dollar, 1240 S. State College Blvd., Anaheim, CA

Facility Element	Findings	Corrective Action
Parking	Additional signage below the symbol of accessibility stating "Minimum Fine \$250" needed on all accessible parking.	An additional sign or additional language below the symbol sign of accessibility shall state "Minimum Fine \$250" (CA T24 1129B.4) p 134
Men's Restroom	Door pressure too high at 8 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207

Women's Restroom	Door pressure too high at 9 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207
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4. Facility Location: Central Regional Center, 2020 W. Walnut Street, Santa Ana, CA

No Findings.

Note: We would like to commend the county for their continued efforts in providing reasonable accommodations to clients. The Central Regional Center has a stamp they use at entry into lobby, and/or at lobby window, Stating "SPECIAL ACCOMMODATIONS PLEASE EXPEDITE" for clients who may need reasonable accommodations.

4. Facility Location: 1928 South Grand Avenue, Santa Ana, CA (HEARING OFFICE)

No Findings. The Hearing Room at this facility meets all ADA compliance.

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	Sometimes	Comments
Does the county identify a client's language need upon first contact? How?	X			At intake. They have the Language "I Speak Cards"
Does the county use a primary language form?	X			
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			The client is assigned a caseworker, who will coordinate with an SSA employee who can provide translation. The county also has the International Language Interpreters Line if needed.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			The client is assigned a caseworker, who will coordinate with an SSA employee who can provide translation. The county also has the International Language Interpreters Line if needed.
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or	X			The county has the International Language Interpreters Line.

Question	Yes	No	Some-times	Comments
any other interpreter process?				
Are county interpreters determined to be competent?	X			
Does the county have adequate interpreter services?	X			The client is assigned a caseworker, who will coordinate with an SSA employee who can provide translation. The county also has the International Language Interpreters Line if needed.
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			
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			
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	X			The county provides the TDD/TTY and the California Relay Services, and contracts with American Sign Language and DEAFinitely Interpreting

Question	Yes	No	Some-times	Comments
impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?				Services, a division of Goodwill Industries. The county provides magnifiers, large print, and audio tapes. They also have the Pub 13 in Braille, large print, and audio.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			There is a screening process through the CalWORKS Program.
Does the county offer screening for learning disabilities?	X			Through the CalWORKS Program
Is there an established process for offering screening?	X			Through the CalWORKS Program
Is the client identified as having a learning disability referred for evaluation?	X			Yes, through the CalWORKS Program

NOTE: Workers stated that they work with the Mental Health behavior specialist to help assist clients who may have a mental health needs.

**B. Corrective Actions
None**

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	CWS/CMS Referral Form	SAWS 1 Application CalWIN	SAWS 1 Application (CR Data Collection Form) Reception Referral
Primary language documentation	CWS/CMS Referral Form	SAWS 1 CalWIN	CalWIN SAWS 1 Application (CR Data Collection Form) Reception Referral
Method of providing bilingual services and documentation	CWS/CMS Client Notebook	CalWIN Case Comments	CalWIN
Client provided own interpreter	CWS/CMS Client Notebook	CalWIN Case Comments	CalWIN
Method to inform client of potential problem using own interpreter	CWS/CMS Client Notebook	CalWIN Case Comments	CalWIN
Release of information to Interpreter	CWS/CMS Client Notebook	CalWIN Case Comments	CalWIN
Individual's acceptance or refusal of written material offered in primary language	CWS/CMS Client Notebook	CalWIN Case Comments	CalWIN

Documented Item	Children's Services	CalWORKs & Employment Services	Non-Assistance CalFresh
Documentation of minor used as interpreter	None noted in case file sample. Would be in CWS/CMS Client Notebook	CalWIN None noted in case sample. Would be in Case Comments.	CalWIN
Documentation of circumstances for using minor interpreter temporarily	None noted in case file sample. Would be in CWS/CMS Client Notebook	CalWIN None noted in case sample. Would be in Case Comments.	CalWIN
Translated notice of actions (NOA) contain translated inserts	N/A	YES	YES
Method of identifying client's disability	None noted in case file sample. Would be in CWS/CMS Client Notebook	CalWIN	CalWIN Was noted in one case sample American Sign Language (ASL), Representative present as ASL Interpreter.
Method of documenting a client's request for auxiliary aids and services	None noted in case file sample. Would be in CWS/CMS Client Notebook	CalWIN	CalWIN

B. Corrective Actions
None

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			
Does the county provide employees Cultural Awareness Training?	X			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?		X		When asked, Children's Social Workers stated they do not remember having MEPA (Multi-Ethnic Placement Act) as part of their training.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions

Training Area	Corrective Action
MEPA Training for Children's Social Workers.	Orange County shall ensure that CSW's receive MEPA training to ensure that public contact staff has knowledge of, and properly apply the placement prohibitions contained in MEPA. 42 U.S.C. 672, 674, and 1996(b)

VIII. DISCRIMINATION COMPLAINT PROCEDURES

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

A. Findings from Staff Interviews and Program Manager Surveys

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

**B. Corrective Action
None**

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Orange County Department of Social Services Civil Rights Compliance Plan for the period July 1, 2012 through June 30, 2013, was received in our office, and is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the Orange County Department of Social Services staff warm, welcoming, informative and very supportive. Particular thanks to Lisa Tamres, Civil Rights Coordinator, for organizing the details of the review, and to Joe Quader, Facilities Manager, who assisted in each of the facility reviews. In each District Office, staff was very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Orange County Department of Social Services in substantial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. Orange County ensures that clients are treated with respect and assisted as their illness allows and as the client desires. If a client is in need of mental health treatment and desires assistance, the client would be referred for service. County workers work with mental health services, including the Health Care Agency (HCA), in these instances. HCA's Centralized Assessment Team comes to the regional office when requested. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The Orange 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.