



CDSS

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DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

July 23, 2013

Ms. Linda Haugan, Assistant County Administrator
San Bernardino County Human Services System
385 N. Arrowhead Drive, 5th Floor
San Bernardino, CA 92415-0140

Dear Ms. Haugan:

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 May 7 – 10, 2013. Enclosed is the final report on the review.

There is 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 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 Cindy Guzman at (916) 654-2117. You may also contact her by e-mail at cindy.guzman@dss.ca.gov.

Sincerely,

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

Enclosure

c: Denise Shefchik, Civil Rights Coordinator

Mike Papin, Chief
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Marlene Fleming, Chief
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
San Bernardino County Human Services System**

**Conducted on
May 7 – May 10, 2013**

**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**

**Reviewer
Cindy Guzman**

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the San Bernardino County Human Services System 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 May 7 – 9, 2013. An exit interview was held May 10, 2013 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)
Fontana	7977 Sierra Avenue Fontana, CA 92335	WTW/Calworks	Spanish
CSF Placement Resources	412 Hospitality Lane, 2 nd Floor San Bernardino, CA 92415	Children's Placement/ Placement Homes	Spanish
PID/Hearings Office	1111 E. Mill Street, Suite 200 San Bernardino. CA 92415	N/A	Spanish
Customer Call Center	860 E. Brier Street San Bernardino, CA 92415	CalFresh Children's WTW/CalWorks Adult Services	Spanish
ASD - Contracts	150 S. Lena Road San Bernardino, CA 92415	Children's WTW/CalWorks	Spanish

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2013 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
- Accommodations Review of Fraud Cases
- Facility inspections
- Hearing room inspection
- Visit to Call Center

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	5	3
Children Social Workers	4	3
Receptionist/Screeners	3	2
Total	12	8

Program Manager Surveys

Number of surveys distributed	3
Number of surveys received	3

Reviewed Accommodations in Fraud Cases

Non-English or limited-English Speakers Case files reviewed	10 Spanish Cases
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Reviewed Case Files

English speakers' case files reviewed	11
Non-English or limited-English speakers' case files reviewed	84
Total case files reviewed	95
Languages of clients' cases	Spanish; Turkish; Arabic; Cantonese Mandarin; Vietnamese; Cambodian; Bengali; Samoan; Chinese; Tagalog; American Sign Language (ASL)

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			Workers can flex their hours to accommodate working clients.
Does the county have extended hours to accommodate clients?	X			The county staff can flex their hours in order to accommodate those clients who need accommodations.
Can applicants access services when they cannot go to the office?	X			Applications or questions can be submitted by email/internet through the county website & information can be sent via mail or fax.
Does the county ensure the awareness of available services for individuals in remote areas?	X			San Bernardino workers reach out to all San Bernardino County offices in order to spread information and learn what clients and community partners need. Clients and community partners are included in notifications via mail, email and phone and include in face to face meetings as applicable.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub	X			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
13 – 6/11)?				
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, Vietnamese?	X			
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?	X			
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	X			
Were the current versions of the required posters present in the lobbies?	X			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			
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.cdss.ca.gov/civilrights/entres/forms/English/pub13.pdf>.

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: 7977 Sierra Avenue Fontana, CA 92335

Facility Element	Findings	Corrective Action
Parking	<p>Two accessible parking spaces on left are too short at 17' 2 ".</p> <p>The words "No Parking" are missing from all accessible parking space access aisles.</p>	<p>Parking space dimensions: 9' wide by 18' long. Access aisle dimensions: 5' wide by 18' long. (CA T24 1129B.3.1 &2) ADA 4.6.3) p 136</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>
Exterior entrance	The sign with the international Symbol of accessibility (ISA) is missing from the main entrance.	<p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction where the accessible route of travel diverges from the regular circulation path along or leading to an accessible route of travel, entrance or facility.</p> <p>(CA T24 1127B.3) p 191 The International Symbol of Accessibility shall be the standard used to identify facilities that are accessible to and usable by physically disabled persons as set forth in these building standards and as specifically required in this section.</p>

	<p>Main Entrance double door pressure too high. Left door pressure high at 9 lbs., Right door pressure high at 8 lbs.</p>	<p>CA T 24 117B.5.8.1) (ADA 4.1.2(7)) p 400</p> <p>The maximum force required to push or pull open a door shall comply with the following:</p> <p>Exterior Door: 5 pounds of force max. Pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(A)) p 207</p> <p>Interior Door: 5 pounds of force max. Pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)) (B)) p 207</p> <p>Fire Door: Min. allowable by administrative authority, not to exceed 15 pounds of force max. (CA T24 1133B.2.5) (ADA 4.13.11(1)) p 207</p>
Emergency alarms:	Emergency alarm is not visual.	<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 a means of warning the hearing impaired.</p> <p>(CA T24 1114B.2.2, ADA 4.28.1) p 242</p>
Men's Restroom	Accessible signage on the door is too high at 64", and on the wall adjacent to the latch side of the door is too low at 55".	<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</p>

		<p>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>
Women's Restroom	<p>Accessible signage on the door is too high at 64", and on the wall adjacent to the latch side of the door is too low at 56".</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>

**2. Facility Location: 412 Hospitality Lane, 2nd Floor
San Bernardino, CA 92415**

Facility Element	Findings	Corrective Action
Parking	Additional signage or additional language below the symbol of accessibility " Minimum Fine \$250 " is missing on all accessible parking spaces.	An additional sign or additional language below the symbol sign of accessibility shall state "Minimum Fine \$250" (CA T24 1129B.4) p 134

**3. Facility Location: 1111 E. Mill Street, Suite 200 (Hearings Office Review)
San Bernardino. CA 92415**

Facility Element	Findings	Corrective Action
Parking	Additional signage or additional language of accessibility " Minimum Fine \$250 " is missing from the 9 accessible parking spaces	An additional sign or additional language below the symbol sign of accessibility shall state "Minimum Fine \$250" (CA T24 1129B.4) p 134
Main entrance	There are two sets of double doors at entrance. Door pressure for these doors are too high at: Left exterior door 17 lbs. Right exterior door at 18 lbs. Inside double doors high at: Left inside door 17 lbs. Right inside door at 19 lbs.	The maximum force required to push or pull open a door shall comply with the following: Exterior Door: 5 pounds of force max. Pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(A)) p 207 Interior Door: 5 pounds of force max. Pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)) (B)) p 207 Fire Door: Min. allowable by administrative authority, not to exceed 15 pounds of force

		max. (CA T24 1133B.2.5) (ADA 4.13.11(1)) p 207
Unisex Restroom	<p>Soap dispenser too high at operable part high at 42 ½", Paper towel dispenser at operable part high at 58"</p> <p>Door pressure too high at 13 lbs.</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> <p>The maximum force required to push or pull open a door shall comply with the following:</p> <p>Exterior Door: 5 pounds of force max. Pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(A)) p 207</p> <p>Interior Door: 5 pounds of force max. Pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)) (B)) p 207</p> <p>Fire Door: Min. allowable by administrative authority, not to exceed 15 pounds of force max. (CA T24 1133B.2.5) (ADA 4.13.11(1)) p 207</p>
Hearings Office A	No Findings	N/A
Interview Room B	No Findings	N/A

4. Facility Location: 860 E. Brier Street, San Bernardino, CA 92415– Transitional Assistance Department - Call Center (No Public Access)

The analyst visited the Transitional Assistance Department Call Center on Brier Street in San Bernardino County. This facility does not have public access, and is not open to clients for services. A tour was given which included the training room, the different work stations, the call board, and the daily functions for incoming calls. This Call Centers' annual number of calls for 2013 is 294,883. As part of new employees' orientation, the workers receive training on customer service, special accommodations, and Civil Rights/Cultural Awareness.

5. Facility Location: Contracts – 150 S. Lena Road, San Bernardino, CA 92415

The Analyst visited the contracts unit at 150 S. Lena Road in San Bernardino County to insure the county services provided by contractors, subcontractors, and vendors follow the Civil Rights language included in the assurance of compliance. Ten case files were pulled and reviewed.

Findings: One contractor case file used their own wording for their assurance of compliance. Two of the assurance of compliance forms were missing, however were found in the "working file". In one case file it was noted the contractor was exempt from signing the assurance of compliance due to having no contact with the public.

Correction Needed: Contractors should use the assurance of compliance form with the correct wording and it should be signed and placed in the actual case file. No contractor is exempt from signing the assurance of compliance form. The analyst was informed the workers have had a recent training and reminder regarding the procedures for the assurance of compliance.

6. Advocate group (Inland Counties Legal Services)

Inland Counties Legal Services, Bay Area Legal Advocates were contacted to ask for input or concerns they may have regarding the county. There was no response; therefore, no input was received for this compliance review.

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			
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			
After it has been determined that the client	X			

Question	Yes	No	Some-times	Comments
is limited-English or non-English speaking, is there a county process for procuring an interpreter?				
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			
Are county interpreters determined to be competent?	X			
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?		X		
Does the county allow the client to provide his or her own interpreter?	X			
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	X			

Question	Yes	No	Some-times	Comments
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			
Does the county offer screening for learning disabilities?	X	-	-	The offer is made as part of the initial assessment process in employment program.
Is there an established process for offering screening?	X	-	-	The offer is made as part of the initial assessment process in employment program.
Is the client identified as having a learning disability referred for evaluation?	X	-	-	In the employment services programs, either co-located staff or referrals would be processed.

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	Face sheet, CFS 104, Application Sheet ADS, 158 A	SAWS 1, C-IV	SAWS 1, C-IV
Primary language documentation	Face sheet, CFS 104, Application Sheet ADS, 158 A	SAWS 1, C-IV, C-IV Flag	SAWS 1, C-IV, C-IV Flag
Method of providing bilingual services and documentation	Face sheet, CFS 262 AD, CFS.10.1	C-IV Journal	C-IV Journal
Client provided own interpreter	CFS 262 AD	Case Journal	Case Journal
Method to inform client of potential problem using own interpreter	None found in case samples	229 Release Form	229 Release Form
Release of information to Interpreter	None found in case samples	229 Release Form	229 Release Form
Individual's acceptance or refusal of written material offered in primary language	None found in case sample	None found in case sample	None found in case sample
Documentation of minor used as interpreter	None found in case sample	None found in case sample	None found in case sample

Documented Item	Children's Services	CalWORKs & Employment Services	Non-Assistance CalFresh
Documentation of circumstances for using minor interpreter temporarily	None found in case sample	None found in case sample	None found in case sample
Translated notice of actions (NOA) contain translated inserts	N/A	Found in NOA	Found in NOA
Method of identifying client's disability	Orange Flag on Case File	C-IV Flag	C-IV Flag
Method of documenting a client's request for auxiliary aids and services	Orange Flag on Case File	C-IV Flag Journal	C-IV Flag Journal

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			Employees stated they receive Division 21 Training and Cultural Awareness Training at orientation and every year.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			Employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint.
Does the county provide employees Cultural Awareness Training?	X			Employees stated they receive Division 21 Training and Cultural Awareness Training at orientation and every year.
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			The employees seem knowledgeable about the cultural groups receiving services.

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			
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			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

**B. Corrective Action
None**

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The San Bernardino County Department of Social Services Civil Rights Compliance Plan for the period 2012 - 2013 is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the San Bernardino County Department of Social Services staff warm, welcoming, informative and very supportive. Particular thanks to Denise Shefchik, Civil Rights Coordinator, for organizing the details of the review, and to Randy Frazier, John Shahan, and Adolphus Okeke, Facilities Managers, who assisted in each of the facility reviews. I also would like to thank Gregg Lacy for giving a tour of the Call Center Facility, and Regina Dalton, for assistance with the Contracts. In each District

Office, staff was very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the San Bernardino County Department of Social Services 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 San Bernardino 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.