CDSS
JOHN A. WAGNER
DIRECTOR

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

ARNOLD SCHWARZENEGGER
GOVERNOR

December 3, 2009

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

Dear Ms. Lowe:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of August 10-12, 2009. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a corrective action plan (CAP). Please submit your CAP within sixty days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it too, becomes a public document. Per the Governor's Executive Order S-08-09, all compliance reviews (and corresponding CAPs) performed after January 2008 will be posted on the state's Reporting Government Transparency website.

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 us by e-mail at crb@dss.ca.gov.

Sincerely,

RAMÓN S. LOPEZ, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Hilary Brown, Civil Rights Coordinator

Chris Webb-Curtis, Branch Chief, CDSS Supplemental Nutrition Assistance Program
M.S. 8-9-32

Mike Papin, CDSS Supplemental Nutrition Assistance Program
Food Stamps Policy Bureau M.S. 8-9-32

Richard Trujillo, CDSS Supplemental Nutrition Assistance Program
Food Stamps Policy Bureau M.S. 8-9-32

Paul Gardes, CDSS Supplemental Nutrition Assistance Program
Food Stamps Policy Bureau M.S. 8-9-32

Thuan Nguyen, Refugee Programs Bureau, M.S. 8-8-46

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

Dominic Pagano, Office of Civil Right
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP
Western Region

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

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

Conducted August 10-12, 2009

California Department of Social Services

Human Resources Management Division

Civil Rights Bureau

744 P Street, MS 8-16-70

Sacramento, CA 95814

(916) 654-2107

Reviewer

Mary Rockwood

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the 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 after the on-site review, which was conducted on August 10-12. An exit interview was held with administrative staff on August 12, 2009.

The 2009 review was conducted in the following locations:

Facility	Address	Programs Reviewed	Languages spoken by a substantial number of clients
Indio	44-199 Monroe St. Ste. D	CalWORKS; NAFS	English & Spanish
Cathedral City	65-615 Perez Rd. Ste. 9A	CalWORKs ;NAFS	English & Spanish
Lake Elsinore	1400 Minthorn St.	CalWORKs;NAFS; IHSS	English & Spanish
Norco	3178 Hammer Ave.	CalWORKs; NAFS	English & Spanish

- There were no other languages representing 5% of the caseload, however, in the case file sample, primary languages represented a somewhat more diverse population and included Spanish, Arabic, Cambodian, Tagalog, Russian, Farsi, Vietnamese, and American Sign Language.

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2008-2009 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

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

Interviews Conducted with Public Contact Staff

Classifications	Total	Bilingual
Eligibility Technician	10	(8)
Lobby Receptionist	2	(2)
Social Worker	2	(0)
Total	**14**	**(10)**

Case File Review (Total 112 cases)

English speakers' case files reviewed	10
Non-English or limited-English speakers' case files reviewed	102
Undocumented/Unable to determine	0
Languages of non-English cases	Spanish, Vietnamese, Arabic, Cambodian, Farsi, Russian, Punjabi, Korean and 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. Any required corrective actions are stated at the end of each section.

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

III. DISSEMINATION OF INFORMATION

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

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Clients 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).
Access to Services, Information and Outreach				
Can applicants access services when they cannot go to the office?	X			Alternatives include access via the telephone, mail and home visits.
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.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
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.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			The distribution is made routinely and discussion held with clients in conjunction with the rights and responsibility discussions.
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			
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.

It is noted that the deficiencies cited in the 2008 review have been corrected (available alternative formats of the Pub 13 and worker compliance with the use of the Pub 13.)

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: Indio District Office, 44-199 Monroe Street

Facility Element	Findings	Corrective Action
Parking	1. There was no warning signage for unauthorized parking in accessible spaces.	1. Additional signage shall be posted in a conspicuous place at entrances or adjacent to and visible from each space stating: "unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates may be towed away at owner's expense. (CA T24 1129B.4.2)

Facility Element	Findings	Corrective Action
	2. The number of designated accessible parking spaces was adequate; however, there was no van accessible space provided.	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))
Building Entrance	The building had automatic doors at the entrance – an excellent feature. There was no signage designating the building as an accessible building.	 A sign (or decal) with the international symbol of accessibility shall posted at the primary entrance designating the building's accessibility. (CA T24 1127B.3; ADA 4.1.3(16B))

Facility Location # 2: **Cathedral City District Office,** 68-615 Perez Rd., Ste. 9A

Facility element	Findings	Corrective Action
Parking	1. There was no warning signage for unauthorized parking in accessible spaces	1. Additional signage shall be posted in a conspicuous place at entrances or adjacent to and visible from each space stating: "unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates may be towed away at owner's expense. (CA T24 1129B.4.2)
	2. None of the accessible parking spaces had the words "No Parking" painted on the pavement within the access aisles.	2. The words "NO PARKING" shall be painted on the ground in each 5 feet or 8 feet loading and unloading access aisle in white letters no smaller than 12 inches. (CA T24 1129B.3.2)

Facility element	Findings	Corrective Action
	3. The number of designated accessible parking spaces was adequate; however, there was no van accessible space provided.	3. 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))
Building Entrance	1. The amount of force/pressure required to open the entrance doors was excessive. There was no actual measurement taken, but entry and exit was made through the doors by the reviewer.	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))
	2. There was no signage designating the building as an accessible building.	2. A sign (or decal) with the international symbol of accessibility shall posted at the primary entrance designating the building's accessibility. (CA T24 1127B.3, ADA 4.1.3(16B))
Restrooms	1. Signage on the door and wall adjacent to both the men's and women's restroom did not meet requirements.	1. In addition to the international symbol centered on doors at a height of 60" above the floor (CA T24 1115B.6), signage for gender identification shall be installed on the wall adjacent to the latch outside of the door. If there is no space, the sign shall be placed on the nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6)
	2. In both the men's and women's restrooms, some of the dispensing equipment was not accessible. The soap dispenser was placed at the	2. At least one of each type of dispensing or disposal fixture must be located with all operable parts at a maximum height of 40". (CA T24 1115B.8.3; ADA 4.23.7)

Facility element	Findings	Corrective Action
	back of the sink out of reach for someone in a wheelchair. The dispenser for toilet seat covers was mounted 53 " from the floor.	

Facility Location # 3: **Norco District Office,** 3178 Hammer Avenue

Facility element	Findings	Corrective Action
Parking	The words "No Parking" painted on the pavement within the access aisles was missing for one of the designated spaces.	Complete the required pavement painting for the second designated space (see regulatory reference cited for other facilities with similar finding).
Restrooms	1. The pressure on both the men's restroom doors was heavy. 2. Signage on the door and wall adjacent to both the men's and women's restroom did not meet requirements.	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)) 2. In addition to the international symbol centered on doors at a height of 60" above the floor (CA T24 1115B.5), signage for gender identification shall be installed on the wall adjacent to the latch outside of the door. If there is no space, the sign shall be placed on the nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6)

Facility Location # 4: Lake Elsinore District Office, 1400 Minthorn Street

This is a new facility with all accessibility features provided. The one minor exception is the signage provided for the van accessible parking space. It was properly located and displayed the designation of a van accessible space; however, the minimum fine information wasnot mounted.

Note: In the reception lobby, it was noted that the one accessible service window that was provided as part of the design, is functionally not available to serve disabled clients seeking assistance in programs other than GAIN. Operationally, decisions were made to station a worker for the GAIN program at that location, leaving all of the other windows available for other clients (none of the other windows with the lowered counter for wheelchair access).

Additionally, the mechanism for dispensing the numbers that clients are required to take (to wait for their turn/number to be called) is out of reach of someone in a wheelchair.

It is recommended that the lowered service counter be made available for its design purpose (ADA accessibility) and the number dispenser be lowered to an accessible position.

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

Question	Yes	No	Some-times	Comments
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 there is the sign, "Interpreter Available" (printed in multiple languages) to assist in identifying a language the staff may be unfamiliar with.
Does the county use a primary language form?	X			Form 3167, Declaration of Language/Special Needs, is in use. Reader is directed to further discussion following the listing of findings for this section.
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. In addition, there is a listing of other bilingual staff who are available to assist with interpreting in other languages. Contract interpreters and telephone translation services are available as additional resources. According to staff, when other languages are spoken, it is often the preference of clients to provide their own interpreters, however.

Question	Yes	No	Some-times	Comments
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 readily available. When bilingual workers are not available, DPSS has both a contract interpreter service and the language line (telephone interpreter service) available for workers to utilize in providing language service. It was found, however, that many workers who have non-English speaking clients who speak neither English nor Spanish, utilize client-provided interpreters in lieu of those alternative resources made available to them by DPSS.
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			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 and interpreter services appear to be in place.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		

Question	Yes	No	Some-times	Comments
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. Appropriate documentation and discussions are held in those cases.
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			
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 (besides the Publication 13)?	X			TDD equipment, as well as ASL interpreters, was mentioned by staff as available assistance for the hearing impaired. Several staff, however, indicated passing notes would be the method of communication used with the hearing impaired client except for interviews. ASL interpreters are available and two cases in the sample had excellent documentation of their role as interpreters.

Question	Yes	No	Some-times	Comments
				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. According to staff, their experience with disabled clients was limited, but indicated that most of the disabled clients bring someone with them to assist.
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			This occurs in the Welfare to Work Program (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.

There has been major improvement in this area, with 100% of the cases reviewed found to have a Primary Declaration Form (3167), including the IHSS cases. Based on findings

during the case file review, however, it appears that some staff still utilize prior versions of the form which do not fully comply with Division 21 regulations. Continued oversight and training of staff is necessary to ensure that the current updated version of the Form 3167 is utilized by the workers.

B. Corrective Actions

Area of Findings	Corrective Actions
Documenting Primary Language choices and the offer of translated written material.	See discussion above regarding the use of the revised Primary Language Form 3167.

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

Documentation Item	Cal WORKs	Food Stamps (NAFS)	IHSS
Ethnic Origin	SAWS 1 + Form 3167	DFA 285 A1+ Form 3167	Soc 295 +Form 3167
Primary language	Saws 1 & Form 3167	DFA 285 & Form 3167	Soc 295 + Form 3167
Method of providing bilingual services	If done, documentation would be in narrative; however, many bilingual workers are still not documenting that they served as interpreter.	If done, documentation would be in narrative; however, many bilingual workers are still not documenting that they served as interpreter.	The case narrative comments were well documented when interpreters were utilized.

Documentation Item	Cal WORKs	Food Stamps (NAFS)	IHSS
Client provided own interpreter	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in sample	Case Narrative well documented.
Method to inform client of potential problem of ineffective communication using own interpreter	Form 3810 and Verbal Discussion	Form 3810 and Verval Discussion	Form 3810 and Verbal Discussion
Release of information to Interpreter	Form 3810	Form 3810	Form 3810
Individual's acceptance or refusal of written material offered in primary language	Revised Form 3167 (not consistently used)	Revised Form 3167 (not consistently used)	Form 3167 (generally correct version)
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 C-IV does not print necessary detail
Documentation of minor used as interpreter	N/A	N/A	N/A
Method of identifying client's disability	Form 3167	Form 3167	Narrative
Method of documenting a client's request for auxiliary aids and services	Form 3167/Narrative	Form 3167/Narrative	Narrative

Additional Comments:

The findings related to deficiencies in documenting delivery of interpreter service by bilingual staff have been ongoing for the past several reviews. In 2009, there was again a finding in this area, however, it was apparent that effort has been made to provide training related to required documentation. The combination of a newly revised Primary Language

Declaration Form (Form 3167) and focus on the requirements related to documentation of the language needs and the means used to meet those needs has increased worker awareness of their responsibility to provide additional documentation. There will be additional discussion in the staff development section of this report related to training that has been implemented.

During the case file review, the effort was in evidence by the use of standardized template formats for workers to use in journal entries to ensure that documentation would be retained in the case record when a bilingual worker (or other interpreter) provided interpreter service to a client. Unfortunately, the use of a template format was not widespread. It is hoped that the efforts will continue to be developed.

B. Corrective Actions

Areas of Action	Corrective Action
Documentation that bilingual services were provided (Interpreters)	Riverside County DPSS must ensure that 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 speaking clients. Documentation of such an offer is required in all programs. Div. 21-116.21

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, and now receive ongoing training in the form of modules distributed electronically and mandated for them. Segment quizzes are a part of the material and are to be completed by all staff.
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			

B. Corrective Actions: None required; however, DPSS is encouraged to continue the on-line training modules and supplement with face-to-face training sessions as deemed necessary. During the interviews, staff consistently gave "rave reviews" on the training and stated that it was very relevant and helpful to them in their day-to-day casework. More than one staff member stated that it brought into focus the "why" of some of the requirements placed on them.

The convenience of the on-line training and the presentation/content were well received and staff felt it was helpful.

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		Staff generally named an administrator in the district as their coordinator.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			They had a general knowledge that such a poster was in the lobby area.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?				The complaint log has been forwarded to the assigned analyst in the Civil Rights Bureau for review.

Recommendation:

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.

B. Corrective Action: Incorporate with Staff Development

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. There was clear evidence that the prior review findings were being addressed and that the administration is committed to a posture of compliance.

The primary area with findings was case documentation. Failure of bilingual staff to document that they provided interpreter service has been discussed each year at the exit meetings and presented in the written reports. This year, however, progress was noted. In the body of the report discussion was presented regarding the use of standardized template formats for journal entries as one means of aiding workers in this area. The recent roll-out of a revised Primary Language Form (Form 3167) was also viewed as an excellent corrective action related to documentation requirements. The task at hand is getting staff to use the current form instead of prior versions of the form that do not fully comply with requirements.

Staff were pleased with new training provided in the area of Civil Rights and appear to be more actively involved on a day-to-day basis. It reflects a more dynamic program and one that the workers understand as one they have a role in delivering.

At this year's exit meeting, there was discussion of the overall findings, including the facility reviews. Overall, the facilities were found to be in substantial compliance, with only minor corrective actions called for.

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.