Update 2012-29: Common Place Handbook
Civil Rights Compliance Review

Background
The California Department of Social Services (CDSS) Human Rights and Community Services Division conducted a Civil Rights Compliance Review in Santa Clara County in April 2012. The review was conducted in the following Social Services Agency (SSA) locations: Benefits Assistance Center (BAC), Continuing Benefit Services (CBS), CalWORKs Employment Services (CWES), Department of Family and Children Services (DFCS), and South County.

Each site 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, and
- Discrimination Complaint Procedures.

Policy
SSA was found to need improvement in the areas of:

- Dissemination of Information,
- Services for Non-English Speaking Clients,
- Documentation of Client Case Records, and
- Discrimination Complaint Procedures

THIS IS NOT A CHANGE. Agency policy is being reiterated as a corrective action measure to ensure staff are in compliance with Division 21 regulations. Current agency policy is included in the Common Place Handbook. [Refer to “Civil Rights,” page 36-1]
Dissemination of Information

- All District Offices must ensure that the current version of the pamphlet “Your Rights Under California Welfare Programs” (Pub 13; rev. 6/11) is available in all languages translated by CDSS.
- Non-English speaking/reading clients must be provided with the translated version of Pub 13 in their primary language.
- The most current version of the poster “Everyone is Different, but Equal Under the Law” (Pub 86; rev. 3/07) must be prominently displayed in all District Office lobbies.

[Refer to ““Your Rights Under California Welfare Programs” (PUB 13),” page 36-10 and “Informing Signs,” page 36-6 for detailed information.]

Services for Non-English Speaking Clients

When clients provide their own interpreter, SSA staff must inform the client of the potential problems in communication. The EW must document in Maintain Case Comments in CalWIN that the client was informed.

EWs must obtain a consent for the release of information from all clients who use a non-County of Santa Clara employee as an interpreter and must document in Maintain Case Comments in CalWIN.

[Refer to “Interpreter Services,” page 36-3 for detailed information.]

Documentation of Case Records

Documentation of bilingual services provided must be thoroughly documented on the Maintain Case Comments window.

The following information must be documented in the case record:

- Staff must clearly document in CalWIN the client’s ethnic origin and primary language.
- Staff must clearly document on the Maintain Case Comments window the method used for providing bilingual services (e.g. Bilingual EW, The Language Line, etc.).
- When a client provides his/her own interpreter, the EW must clearly document on the Maintain Case Comments window that the client was informed of the potential problems for ineffective communication.
- When a client uses a non-County of Santa Clara employee as his/her interpreter, the EW must clearly document on the Maintain Case Comments window that a Consent for release of information was obtained from the client.
Discrimination Complaint Procedures

SSA staff must know the discrimination complaint process and be able to differentiate it from other complaint processes.

[Refer to “Grievance Procedures,” page 36-5 for the additional information regarding the Discrimination Complaint Process.]

Implementation

These civil rights policies are already in effect. These clarifications are being issued to reinforce current policy and procedures.

Clerical

Office Management Coordinators (OMCs) must review this Update with their respective staff at their next clerical meeting, and ensure that correct procedures are being followed.

Eligibility Supervisors

Eligibility Work Supervisors must review this Update with their respective staff at their next unit meeting, and ensure that correct procedures are being followed.