

**COUNTY OF ORANGE SOCIAL SERVICES AGENCY
ADMINISTRATIVE POLICIES AND PROCEDURES
MANUAL**

Category: Policies

Subject: Civil Rights and Nondiscrimination and American
with Disabilities Act, Title II

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Approved: Signature on file

POLICY

Civil Rights: Pursuant to federal (<http://www.justice.gov/crt/about/cor/coord/titlevi.php>), state laws (<https://www.cdss.ca.gov/inforesources/civil-rights>), the California Department of Social Services (CDSS) Manual of Policies and Procedures (MPP) [Division 21](#), [ACL 18-33 Implementation of Assembly Bill \(AB\)959: Lesbian, Gay, Bisexual and Transgender Disparities Reduction Act](#) and [Senate Bill \(SB\) 179 Gender Recognition Act](#), counties are required to ensure nondiscriminatory administration of public assistance and social services programs. No person shall, because of protected status [i.e., race, color, national origin, language, immigration status, age, disability (including HIV status), religion, sex, gender identity, gender expression, sexual orientation, political affiliation, marital status, ethnic group identification, domestic partnership, medical condition, genetic information, ancestry and any other applicable basis be subjected to disparate treatment, excluded from participation in, denied benefits, or subjected to discrimination under any program or activity. Administrative methods and procedures that have the effect of subjecting individuals to discrimination or defeating the objectives of these laws and regulations are prohibited.

Pursuant to CDSS MPP 21-103.3 & .4, CDSS reserves the right to interview staff, review, copy, or obtain all data, records, reports, case files and other materials determined necessary in the conduct of discrimination complaint investigations involving all agencies subject to these requirements. County welfare departments, contractors, vendors, consultants, and other providers of service, who receive state or federal financial assistance through CDSS for administration of public assistance, or through agencies covered by CDSS regulations, are mandated to comply with these requirements.

ADA Title II: Agency staff shall ensure non-discriminatory work and public service facilities providing access to programs and services for people with disabilities as outlined in the ADA Title II requirements. Complaints regarding barriers to public access to Agency programs and services shall be handled as efficiently and expeditiously as possible with recommended accommodations completed as necessary. Agency staff shall follow the County's grievance procedures for those individuals with disabilities that are not or cannot be accommodated, or for those individuals who deny recommended accommodations.

ACL 18-33 and SB179: County Welfare Departments should make efforts for periodic training of all front-line staff on Sexual Orientation and Gender Identity (SOGI) sensitivity and best practices.

Transgender people may identify as female, male, or nonbinary, may or may not have been born with intersex traits, may or may not use gender-neutral pronouns, and may or may not use more specific terms to describe their genders, such as agender, genderqueer, gender fluid, Two Spirit, bigender, pangender, gender

nonconforming, or gender variant. Studies show that transgender people disproportionately face discrimination, harassment, and violence in areas of life including housing, education, employment, health care, and law enforcement.

All complaints, regardless whether they have been readily resolved or not, shall be reported to the Program Integrity Unit for documentation, and/or investigation. These complaints could be any allegations of discrimination reported by any clients or their authorized representatives of social services programs in compliance with the State and Federal Civil Rights and ADA Title II laws and regulatory requirements.