
**ORANGE COUNTY SOCIAL SERVICES AGENCY
CFS OPERATIONS MANUAL**

Effective Date: July 26, 2001
Revised: November 13, 2025

Number: B-0105

Client Rights

Purpose	To provide guidelines for ensuring the rights of Children and Family Services (CFS) clients as mandated by State and Federal civil rights laws and regulations.
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Approved	This policy was approved by Loan English, Director of CFS. <i>Signature on file.</i>
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Most Recent Revisions	This revision of the Policy and Procedure (P&P) incorporates: • Attachment 1 – Guidelines for Identification/ Documentation of Individuals with a Disability under the Americans with Disabilities Act (ADA) and Reasonable Accommodations • Guidance per All County Letter (ACL) 19-45 that child welfare agencies provide reasonable accommodations to individuals with disabilities.
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Background	The California Department of Social Services (CDSS) requires county welfare departments and all other agencies receiving federal or state financial assistance to ensure that programs are nondiscriminatory, eliminate barriers to access, and are in compliance with the Title VI Civil Rights Act of 1964 as amended.
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Division 21 of the CDSS Manual of Policy and Procedures (MPP) provides comprehensive guidelines for agencies to use in meeting these requirements. These guidelines outline the responsibilities of agencies to implement nondiscriminatory practices and ensure equitable delivery of benefits and services to all eligible individuals.

[All County Letter \(ACL\) 19-45](#) emphasizes the obligation of agencies to provide reasonable accommodations and ensure equal access to individuals with disabilities. This includes, but is not limited to, ensuring effective communication by offering auxiliary

aids and services, such as qualified interpreters or assistive technology, to facilitate meaningful access to programs and services for persons with disabilities.

Together, these statutory and regulatory requirements serve to uphold the civil rights of all individuals by ensuring that programs and services are free from discrimination and accessible to everyone, regardless of race, color, national origin, disability, or other protected bases.

Definitions

None.

POLICY

Civil Rights

CFS will ensure the protection of client rights by:

- A. Informing clients of their rights.
- B. Delivering services that are non-discriminatory.
- C. Documenting evidence of attention to client civil rights.
- D. Cooperating with monitoring or investigation activities by CDSS and the SSA Civil Rights Unit.
- E. Providing the complaint procedure to clients who claim discrimination.

**Informing
Clients**

Clients will be informed of their rights by provision of:

- A. Civil Rights posters (listed below) along with the PUB 13 pamphlet *"Your Rights Under California Welfare Programs"* in threshold languages (English, Spanish, Vietnamese, Korean, Farsi, and Chinese):
 - "And Justice for All"
 - "Americans with Disabilities Act of 1990 Non-Discrimination Notice"
 - PUB 86: "Discrimination is Against the Law"

Reception employees will ensure that the Civil Rights publications are prominently displayed in CFS waiting rooms and reception areas.

CFS Store Clerk employees will order and maintain a supply of the Civil Rights publications.

- B. "Your Rights Under California Welfare Programs" (PUB 13) pamphlets will be provided by the Assigned Senior Social (ASW) and other CFS employees, as appropriate, and explained in the client's preferred language.

Additional languages may be found on the [CDSS Translated Forms and Publications](#) website.

Note: Any individual who has contact with SSA is entitled to file a complaint and/or request a PUB 13 pamphlet, and must be provided the pamphlet.

The PUB 13 pamphlets must be given by CFS employees to clients:

1. During emergency response visits.
2. At investigation interviews.
3. When a client makes a complaint of discrimination.
4. Whenever requested.

- C. Non-discrimination advisement inserts informing clients that they may request reasonable accommodations if they have a disability and need assistance accessing SSA services.

The Advisement Insert will be provided during investigation interviews, to clients and to all other individuals encountered during an investigation involving CFS programs and services and whenever the PUB 13 is given.

Examples of written communication that should include the advisement insert, though not limited to, are: Protective Custody Warrants, forms, letters, and Notices of Action, etc.

Refer to policy section "Written Communication" in SSA Administrative P&P [Civil Rights Reasonable Accommodations \(A 11\)](#) for further guidance.

**Offering
Reasonable
Accommodations**

The obligation to offer and provide reasonable accommodations to an individual with a disability begins at the first contact and continues throughout the individual's participation in any SSA program.

When a disability is apparent or has been identified, CFS employees must assess whether the client requires additional assistance and provide necessary accommodations. Employees should proactively offer accommodations, even if the disability has not been disclosed.

For additional guidelines on identification and documentation of disabilities refer to [Attachment 1 — Guidelines for Identification/Documentation of Individuals with a Disability under the Americans with Disabilities Act \(ADA\) and Reasonable Accommodations](#).

Whenever a client requests a change in the normal policies, practices, or procedures because of their disability, this should be treated as a reasonable accommodation request. The SSA [Reasonable Accommodation Request Form](#) may be used for this purpose but is not necessary.

Note: A non-disabled individual may also request an accommodation that is needed due to the disability of another person with whom they are associated, such as a family member.

CFS employees will engage in an interactive process with the client requesting the accommodation or the person acting on their behalf.

An interactive process is a collaborative effort between the client and CFS to identify an accommodation that ensures equal access.

For further information on the Interactive Process, refer to policy section “Interactive Process” in SSA Administrative P&P [Civil Rights Reasonable Accommodations \(A 11\)](#) for further guidance.

Note: The determination to deny a reasonable accommodation request can only be made by the SSA Director or their designee.

**Caregiver
Accommodations**

Caregivers play a vital role in supporting families and are also entitled to reasonable accommodations to support their participation in services and interactions with the agency. This may include, but is not limited to, adjusted meeting times, accessible communication formats, and physical access accommodations.

For procedural guidelines to facilitate accurate identification, documentation, and provision of services that constitute reasonable accommodation for caregivers, refer to [Attachment 1 — Guidelines](#)

[for Identification/Documentation of Individuals with a Disability under the Americans with Disabilities Act \(ADA\) and Reasonable Accommodations.](#)

Delivery of Services

Provisions will be made for CFS clients who are non-English speaking and Limited English Proficiency or Clients with Disabilities as follows:

A. Non-English Speaking or Limited-English Proficient (LEP) Clients

At initial contact, CFS employees will request that the client identify their primary/preferred language for both oral and written communication. If needed, the client may use the SSA [Language Identification Guide](#) for identifying their language. CDSS also provides "[I Speak](#)" cards available through their website to assist in identifying a client's language.

Interpretation services for non-English speaking or LEP clients may be provided by:

1. SSA Certified bilingual employees.
2. SSA contracted interpreter.
3. Non-SSA interpreter at the request of the client. Prior to clients using their own interpreter, CFS employees are required to advise clients of the following:
 - Their right to request free SSA county-provided interpretive services at any time.
 - The possibility of communication errors when they use their own interpreter.
 - The need to interpret sensitive and personal information, and that CFS employees cannot guarantee that the client-provided interpreter will maintain confidentiality.
 - The need for a signed *Interpreter Services Statement and Confidentiality Agreement* (CR 6181).

When clients opt to use their own interpreter after being offered free SSA county-provided interpretation services, CFS employees must use the CR 6181. The CR 6181 serves as a consent and release of information document, enabling the client to use their own interpreter and must be explained in the client's preferred language.

A new CR 6181 must be completed:

- if no CR 6181 is on file
- if the CR 6181 was completed over a year ago
- if the client opts to use a different interpreter

CFS employees may not use the client-provided interpreter without a completed CR 6181. If the client or their interpreter refuses to complete the CR 6181, CFS employees must use a county-provided interpreter or qualified bilingual employee. Household members (including spouses) may not be used as interpreters for a client without a completed CR 6181.

Note: Per [ACL 24-68](#), requirements to use the CR 6181 are not intended to interfere with or delay a CFS employee member's response to an emergency situation. In an emergency situation, completion of the CR 6181 is not required and the CFS employees will document efforts to complete the CR 6181.

Refer to policy section "Non-English Language Interpretation (SSA-Provided) in SSA Administrative P&P [Civil Rights Obligations for Non-English Language and Sign Language Interpretation Services \(E 21\)](#) for further guidance.

While clients may use their own interpreter, CFS employees must not compel, encourage, or require the clients to do so, or discourage requests for and/or use of an SSA-provided interpretation service at any time. CFS employees may arrange for a certified county interpreter to assist if a conflict of interest or accuracy of the translation being provided is in question.

Clients are to be advised of their right to free interpretive services and provided an interpreter at each telephone and in-person contact. Employees should not conduct substantive, program-related conversations with the client until qualified interpretive services are available. Substantive contacts involve discussion of benefits, services, rights, responsibilities, or appointment scheduling.

Note: CFS employees shall not rely on minor children, employees of other agencies or non-SSA interpreters (i.e. law enforcement, etc.) to interpret or facilitate communication, except in an emergency involving an imminent threat to the

safety or welfare of an individual or the public, and when there is no interpreter available. (ACL 19-45)

Refer to SSA Administrative P&P [Civil Rights Obligations for Non-English Language and Sign Language Interpretation Services \(E 21\)](#) for further guidance on the imminent threat exception.

Note: Google Translate or other applications cannot be used.

Forms and other written material required for services in the client's primary language will be offered to the client. When such forms and written material contain spaces in which employee insert information, the inserted information will also be in the client's primary language. [Translated forms](#) provided by CDSS may be obtained through their website.

B. Non-English Speaking or Limited-English Proficient (LEP) Youth

Per [ACL 23-04](#), youth who are non-English speaking or LEP are entitled to receive a copy of the following documents in their primary language:

- Court report
- Case plan
- Transition to Independent Living Plan (TILP)
- Foster Youth Bill of Rights

CFS employees will ensure that each of these documents is provided to the youth in their preferred language.

Refer to Attachment C “*Non-English Language Interpretation Services*” in SSA Administrative P&P [Civil Rights Obligations for Non-English Language and Sign Language Interpretation Services \(E 21\)](#) for information on obtaining interpretation services from SSA’s contracted service providers.

C. Disabled Clients

CFS will provide clients with disabilities the opportunity to request auxiliary aids or services of their choice to ensure full access to all programs and services. Employees will give primary consideration to the requests of these individuals.

Refer to SSA Administrative P&P [Civil Rights and Nondiscrimination and Americans with Disabilities Act \(D 19\)](#) for further guidance regarding provision of auxiliary aids for individuals with disabilities.

Documentation

Information and actions relative to the above policy are to be documented by CFS employees for non-English speaking, limited English proficiency, or disabled clients in the following:

A. Child's Case File

1. The [Language Assessment \(F063-25-468\)](#) may be used for the identification of the client's primary/preferred language. The document will be imaged/stored in OnBase.
2. A signed *Interpreter Services Statement and Confidentiality Agreement (CR 6181)* form is needed when a client opts to use a non-SSA interpreter. The document/signature will be obtained at initial use of that interpreter. Once signed, it will serve as documentation for a maximum of one year, unless the client changes their non-SSA interpreter. An updated CR 6181 must be completed annually and be imaged/stored in OnBase.

B. CWS/CMS

Entries to be made in CWS/CMS include:

1. Primary language documented in Client Management Section, Existing Clients notebook, ID page. Choose correct language from drop down menu.

Note: If client is illiterate, check "No" in "Literate" box.

2. Language-related accommodations documented in case contact narrative at initial contact, every substantive contact, and updated annually:
 - That the non-English speaking/LEP client was offered free language services in their primary/preferred language for oral/written communication
 - Whether the client accepted or refused
 - The language used and who provided language services
 - That the client was informed of potential problems for ineffective or inaccurate communication when requesting a non-SSA interpreter
 - That free county interpreter services were offered even when the client self-selected their own interpreter, documented at the first occurrence and every contact.

3. Ethnicity documented in Client Management Section, Existing Clients notebook, ID page. Select client's ethnicity from drop down menu.
4. Receipt of *PUB 13* pamphlet –
 - If child removed: In the Placement Management Section, Existing Placement Notebook on the Child Removal page, check appropriate box, “Notified of Civil Rights” and in the Investigation Narrative, “Language/Civil Rights” section.
 - If child not removed: In the Investigation Narrative, “Language/Civil Rights” section.
5. Disability/Reasonable Accommodations information will be documented as follows:
 - Child/NMD/Parent/Guardian
 - Screener/Case alerts on ID page
 - Complicating Factors in Screener Narrative (Referral only)
 - Investigation Narrative (Referral only)
 - Case contact narratives
 - Health notebook
 - Summary tab in Health Notebook (Child only)
 - Health and Education Passport (HEP) (Child only)
 - Caregiver
 - Screener/Case alerts on ID page
 - Investigation Narrative
 - Case contact narratives

Refer to [Attachment 1 – Guidelines for Identification/Documentation of Individuals with a Disability under the Americans with Disabilities Act \(ADA\) and Reasonable Accommodations](#) for further details regarding this process.

Note: The determination to deny a reasonable accommodation request can only be made by the SSA Director or their designee.

Refer to policy section “Denial of Reasonable Accommodation Requests” in SSA Administrative P&P [Civil Rights Reasonable Accommodations \(A 11\)](#) for further information.

C. **Court Reports**

Statements are also to be included in court reports, providing information regarding a child and parent/guardian(s) primary language, impairments, disabilities, and services/ accommodations provided.

Note: For caregivers, document only the accommodation provided, that it does not impact the child's safety or well-being, and is consistent with ADA regulations.

For further guidance on documentation requirements, refer to [Attachment 1 – Guidelines for Identification/Documentation of Individuals with a Disability under the Americans with Disabilities Act \(ADA\) and Reasonable Accommodations](#).

D. **Forms**

Forms are available for employees to record and document client rights were addressed:

1. *Interpreter Services Statement and Confidentiality Agreement (CR 6181)* is used to document confidentiality and release of information for the child's file when the client selects their own interpreter. A new CR 6181 must be completed when:
 - No CR 6181 is on file
 - The CR 6181 was completed over a year ago
 - The client opts to use a different interpreter

This form is available in English, Spanish, Vietnamese, Korean, Farsi, Chinese, and other languages on the CDSS website

2. [Language Assessment \(F063-25-468\)](#) may be used to identify the client's primary/preferred language at initial contact, updated annually, and at any time the client requests a change in either their preferred oral or written language. This form is not required or necessary for a client to request a change in language.

Note: The [Language Identification Guide](#) may also be used and is located in any SSA ADA/Civil Rights Bin.

3. Any information concerning client language needs, disabilities, and services/accommodations are to be included in the [Case Transfer Summary \(F063-28-319R\)](#) when the case is transferred.

Monitoring Client Rights

The SSA Civil Rights Unit:

- A. Monitors and facilitates compliance with [CDSS Division 21](#) regulations.
- B. Completes an annual Civil Rights Plan for Orange County.
- C. Provides support and training to agency employees.
- D. Receives and investigates discrimination complaints against SSA employees, practices, and contract service providers.
- E. Maintains complaint records for a minimum of three years.
- F. Provides support for updating policy and procedures.

Additionally, CDSS conducts annual reviews and oversees complaint investigations. CDSS may interview CFS employees for this purpose.

Complaints

When a client has a complaint of discrimination, CFS employees will:

- A. Provide both the complaint form, [Discrimination/Retaliation Complaint \(F063-07-80\)](#) and PUB 13 in the client's primary language. Check the [CDSS website](#) or [Civil Rights SharePoint](#) for non-English translation if unavailable in Electronic Forms Management System (EFMS). Complaints may be accepted in any format and do not require the complaint form. Inform the client to file the complaint within 180 days of the alleged discriminatory act.

Note: Any individual accessing SSA facilities has the right to file a complaint regardless of whether they are receiving services directly.

- B. Advise the client that they may file the complaint with the SSA Civil Rights Unit or directly with the California Department of Social Services (CDSS), and the U.S. Department of Health and Human Services (HHS) or California Civil Rights Department (CRD).
- C. Provide the address and phone number of the Civil Rights Unit as needed:

County

Program Integrity Civil Rights Unit
P.O. Box 22001

Santa Ana, CA 92705
(714) 438-8877
SSApcivilrights@ssa.ocgov.com
Pony Mail: Building 180

State

California Department of Social Services
Civil Rights Unit
PO Box 944243, MS 8-16-70
Sacramento, CA 94244-2430
(866) 741-6241 (toll free)
crb@dss.ca.gov

State

California Civil Rights Department (CRD)
651 Bannon Street, Suite 200
Sacramento, CA 95811
800-884-1684 (voice)
800-700-2320 (TTY)
contact.center@calcivilrights.ca.gov

Federal

U.S. Dept of Health and Human Services
Centralized Case Management Operation
200 Independence Avenue, S.W.
Room 509F, HHH Bldg.
Washington, D.C. 20201
(800) 368-1019 (Toll Free)
ocrcomplaint@hhs.gov

- D. Assist the client with completion of the form, if requested, **or** if the complaint is received by telephone/remote access. If the employee is taking the complaint by telephone/remotely, a [*Discrimination/Retaliation Complaint \(F063-07-80\)*](#) form and *PUB 13* in the client's preferred language must also be mailed and documented in the client's case record.
- E. Promptly forward the completed form to Civil Rights Unit, Bldg. #180, if completing the form for the client, and inform client that someone from the Civil Rights Unit will contact them. The client may also file the complaint directly by telephone. Advise the client of the phone number for the SSA Civil Rights/ADA Coordinator: (714) 438-8877.
- F. Cooperate with any SSA Civil Rights investigation, when requested.

G. If contacted by an attorney or an individual identifying themselves as a Civil Rights Investigator from an outside agency, either by phone or email, respond as follows:

- Do not confirm or deny whether the client is receiving services through the agency.
- Do not disclose any case information.
- Forward the communication to the Civil Rights Unit for proper handling and evaluation.

REFERENCES

Hyperlinks

Employees accessing this document by computer may create a direct connection to the following references by clicking on them.

- [SSA Administrative Policy and Procedure Civil Rights and Nondiscrimination and Americans with Disabilities Act, Title II \(D 19\)](#)
- [SSA Administrative Policy and Procedure Civil Rights Obligations for Non-English and Sign Language Interpretation Services \(E 21\)](#)
- [SSA Administrative Policy and Procedure Civil Rights Reasonable Accommodations \(A 11\)](#)
- [Program Integrity-Civil Rights, SSA Administration](#)
- [CDSS Civil Rights Website](#)

REQUIRED FORMS

Online Forms

Required forms listed below may be printed out and completed, or completed online, and may be accessed by clicking on the link provided.

Form Name	Form Number
Language Assessment	F063-25-468
Discrimination/Retaliation Complaint	F063-07-80
Discrimination/Retaliation Complaint (Spanish)	F063-07-80 (Spanish)
Discrimination/Retaliation Complaint (Vietnamese)	F063-07-80 (Vietnamese)
Discrimination/Retaliation Complaint (Farsi)	F063-07-80 (Farsi)
Interpreter Services Statement and Confidentiality Agreement	CR 6181

Interpreter Services Statement and Confidentiality Agreement (Spanish)	CR 6181 (Spanish)
Interpreter Services Statement and Confidentiality Agreement (Vietnamese)	CR 6181 (Vietnamese)
Interpreter Services Statement and Confidentiality Agreement (Korean)	CR 6181 (Korean)
Interpreter Services Statement and Confidentiality Agreement (Farsi)	CR 6181 (Farsi)
Interpreter Services Statement and Confidentiality Agreement (Chinese)	CR 6181 (Chinese)
Placement Information Change (PIC) Notice	F063-28-301

Hard Copy Forms

Forms listed below must be completed in hard copy (including multi-copy NCR forms). ***For reference purposes only***, links are provided to view these hard copy forms, where available.

Form Name	Form Number
None.	

CWS/CMS Forms

The following required forms may ***only*** be obtained in CWS/CMS. ***For reference purposes only***, links are provided to view these CWS/CMS forms, where available.

Form Name	Form Number
None.	

Brochures

Brochures to distribute in conjunction with this policy include:

Brochure Name	Brochure Number
Your Rights under California Welfare Programs (English)	PUB 13

(Other languages available: [Spanish](#), [Vietnamese](#), [Chinese](#), [Cambodian](#), [Armenian](#), [Russian](#), [Arabic](#), [Farsi](#), [Hmong](#), [Korean](#), [Lao](#), [Tagalog](#), [Japanese](#), [Mien](#), [Portuguese](#), [Punjabi](#), [Russian](#) and [Ukrainian](#))

Also available in [large font print](#), Braille, and audio formats.

Discrimination is Against the Law	PUB 86
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LEGAL MANDATES

[ACL 01-28](#) discusses the revised Civil Rights Annual Plan, required by Division 21, which outlines each county's anti-discrimination policies and procedures for CDSS-funded services, and, once approved by the Civil Rights Bureau, serves as a standard for compliance reviews, where actual practices are checked against the plan and any discrepancies must be corrected.

[ACL 06-20](#) reminds child welfare departments of the obligation to comply with the California Department of Social Services (CDSS) Manual of Policies and Procedures (MPP) Division 21 regulations regarding the provision of effective language services to all clients in their primary language. These requirements apply regardless of whether the county provides an interpreter or the client chooses to provide their own interpreter.

[ACL 08-65](#) provides information on how counties must document that interpretive services were offered and provided to non-English speaking or Limited English Proficient (LEP) clients and the documentation should be "in sufficient detail to permit a reviewer to determine the agency's compliance with the requirements of Division 21".

[ACL 19-45](#) reminds child welfare departments of the ongoing obligation to ensure equal and meaningful access for individuals with disabilities to state and federally funded public assistance and social service programs.

[ACL 23-04](#) states when youth are entitled to receive a copy of their court report, case plan, transition to independent living plan (TILP), or Foster Youth Bill of Rights, social workers shall ensure those documents are translated in the youth's primary language if it is not English.

[ACL 23-98](#) communicates changes to required appeal language for civil rights complaints. Counties must inform civil rights complainants, in writing, of the result of their complaint and notify complainants of their right to appeal a county decision to the CDSS. Counties must also notify complainants of their rights to appeal to or file a new complaint with the federal government, whether or not a complaint investigation was conducted.

[ACL 24-68](#) provides guidance and instructions to county welfare department employees for completing and documenting Form CR 6181 Interpreter Services Statement and Confidentiality Agreement (CR 6181). It contains new guidance on using the CR 6181 when Deaf and hard of hearing (DHH) individuals want to use their own interpreter, instructions for completing the form during remote service delivery, and reminders regarding use of Telecommunication Relay Services.

[ACIN I-09-06](#) reminds counties of their obligation to provide effective language services in each individual's primary language to all clients and to document how services are provided for non-English/limited-English-proficient and disabled clients.

[ACIN I-39-24](#) reminds child welfare departments of the obligation to ensure effective communication with individuals who are Deaf and hard of hearing (DHH).

[Title VI Civil Rights Act of 1964, as amended](#), prohibits discrimination on the basis of race, color, and national origin in any program or activity receiving federal financial assistance, ensuring that no person in the United States is excluded from participation in, denied the benefits of, or subjected to discrimination under such programs.

[CDSS-MPP, Division 21](#) mandates that counties and contractors ensure nondiscriminatory access to all CDSS-funded programs by complying with federal and state civil rights laws, providing reasonable accommodations, language services, and protections for all protected classes. This division also requires counties to implement policies, conduct complaint investigations, and submit annual civil rights compliance plans to promote equitable service delivery.

REVISION HISTORY

Since the Effective Date of this P&P, and prior to the Current Revision Date, the following revisions of this P&P were published:

November 1, 2004
August 29, 2006
April 22, 2008
April 7, 2009
July 7, 2010