

**SUBMITTAL TO THE BOARD OF SUPERVISORS  
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA**

630



**FROM:** Executive Office

**SUBMITTAL DATE:**  
September 15, 2016

**SUBJECT:** Response to the 2015-2016 Grand Jury Report Regarding the Department of Public Social Services Administrative Policies and Procedures [All Districts]; [\$0].

**RECOMMENDED MOTION:** That the Board of Supervisors:

1. Approve, with or without modification, the attached response to the 2015-2016 Grand Jury report regarding the Riverside County Department of Public Social Services Administrative Policies and Procedures; and
2. Direct the Clerk of the Board to immediately forward the Board's finalized responses to the Grand Jury, the Presiding Judge and to the County Clerk-Recorder (for mandatory filing with the state).

**BACKGROUND:**

**Summary**

Penal Code Section 933(c) requires the Board of Supervisors comment on the Grand Jury's recommendations pertaining to matters under the Board's control. In addition, responses must be provided to the Presiding Judge of the Superior Court within 90 days of receipt of the report.

(Continued on page 2.)

Departmental Concurrence

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost:	POLICY/CONSENT (per Exec. Office)
COST	\$ N/A	\$ N/A	\$ N/A	\$ N/A	Consent <input type="checkbox"/> Policy <input checked="" type="checkbox"/>
NET COUNTY COST	\$ N/A	\$ N/A	\$ N/A	\$ N/A	

<b>SOURCE OF FUNDS:</b>	<b>Budget Adjustment:</b> No
	<b>For Fiscal Year:</b> 2015/16

**C.E.O. RECOMMENDATION:**

**APPROVE**

BY: 

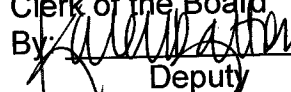
George A. Johnson

County Executive Office Signature

**MINUTES OF THE BOARD OF SUPERVISORS**

On motion of Supervisor Ashley, seconded by Supervisor Washington and duly carried by unanimous vote, IT WAS ORDERED that the above matter is approved as recommended.

**Ayes:** Jeffries, Tavaglione, Washington, Benoit and Ashley  
**Nays:** None  
**Absent:** None  
**Date:** September 20, 2016  
**xc:** EO, Grand Jury, Presiding Judge, DPSS, Recorder

Kecia Harper-Ihem  
 Clerk of the Board  
 By:   
 Deputy

**Prev. Agn. Ref.:** **District:** All **Agenda Number:**

**3-15**

- A-30
- Positions Added
- 4/5 Vote
- Change Order

**RESPONSE TO  
2015-2016 GRAND JURY REPORT  
COUNTY OF RIVERSIDE  
DEPARTMENT OF PUBLIC SOCIAL SERVICES  
ADMINISTRATIVE POLICIES AND PROCEDURES**

The Riverside County Department of Public Social Services (DPSS) submits this report in response to the Findings and Recommendations of the Riverside County Grand Jury Report dated June 21, 2016.

**BACKGROUND RESPONSE:**

Riverside County DPSS has three (3) policy development groups responsible for developing and publishing department policies. Children's Services Division (CSD) is responsible for Child Welfare and Foster Care (FC) program specific policies. Adult Services Division (ASD) is responsible for Adult Protective Services (APS) and In-Home Supportive Services (IHSS) program specific policies. Planning and Evaluation Policy Development (PEPD) is responsible for Administrative policies and Self-Sufficiency (SS) program specific policies, which include Medi-Cal, CalFresh, California Work Opportunity and Responsibility for Kids (CalWORKs), Welfare-to-Work, and Child Care programs.

Program policies are developed from State and Federal program laws, legislation, and regulation. Administrative policies apply to all DPSS staff. DPSS' responses to the following findings and recommendations are organized to identify whether it applies to program specific policy and/or administrative policy.

**FINDING NO. 1:**

The DPSS Administrative Policy and Procedure manual located on the department's intranet lacks a systematic order and is not user-friendly. According to DPSS Administrative Policy 17-001, policies and procedures are categorized by division. However, the Grand Jury found evidence of several policies that were not categorized by division and did not meet the index description indicated in the policy. It also found that the mapping index was not alphabetized nor categorized to facilitate accessibility.

Between February and March 2016, the Grand Jury visited DPSS regional offices located in the cities of Hemet, Riverside, and Blythe. The purpose of the visits and subsequent interviews was to evaluate the accessibility and effectiveness of DPSS Administrative policies. DPSS Administrative policies are located and maintained on the department's intranet. During the course of the visits, the Grand Jury observed that a majority of the Regional Managers, Deputy Regional Managers, and Supervisors interviewed (9 of 13) could not locate specific administrative policies and procedures on the department's intranet when requested by the Grand Jury. This was due to the lack of an organized system for categorizing and tracking department policy.

**RESPONSE: Respondent disagrees partially with this finding.**

Currently, DPSS staff utilizes the "Policies & Forms" section of the DPSS Intranet to access Department Policies, Memorandums, Forms and Program Announcements, with the exception of child welfare policy. Here, staff can search by keyword, program,

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category, alphabetical order or document number. However, DPSS agrees that this method for locating specific policies is limited by staff's use of appropriate key words and by the reliance on policy titles and keywords to search. Another option available to staff is a Table of Contents for all Department Policies which is updated monthly. The policies are grouped by type to assist staff with locating specific types of policies. For example, all personnel related policies are grouped together as division 11 and all CalFresh policies are grouped together under division 63.

For Children Services, due to State restrictions, child welfare policy is maintained in a separate system, where staff is able to access program specific policies that are organized in accordance with the State Department of Social Services policy manual. Staff is able to use an index as well as a search function to locate policies and related forms.

Overall, DPSS concurs that the existing tool has limitations and has been working with Riverside County Information Technology (RCIT) to identify a more robust, user-friendly system for staff to easily access the more than 1,000 department policies that exist. Ideally, we are looking for a solution where there are hyper-links between related department memorandums, policies and forms.

**RECOMMENDATION NO. 1:**

Establish a standard for categorizing, cross referencing, and/or mapping policy titles for easier access to information. Revise the DPSS Administrative Policies and Procedures Manual Table of Contents (mapping index) to conform to a more systematic, organized, and simplistic format for easy accessibility.

According to the Bureau of Business Practice (1988), "Policies convey the mission, philosophy, and goals of the Department." Having policies and procedures well organized saves time and eliminates confusion. Lack of an organized system for locating administrative policies and procedures could affect management's ability to effectively manage resources and ensure the department's mission, philosophy, and goals are consistently implemented across the enterprise.

**Response: This recommendation has been partially implemented, with additional implementation in the future.**

Currently, policies are organized and grouped by type to assist staff with locating different kinds of policies. For example, administrative policies have been numbered by group type, such as communication and confidentiality. Program policies are grouped into divisions utilizing a numbering system by program category in alignment with the California Department of Social Services (CDSS) Manual of Policies and Procedures (MPP).

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When utilizing the DPSS Intranet, staff sort and/or locate program and administrative policies numerically, alphabetically and through key word functionality. The document search provides staff the policies and related forms identified through the search. Policy staff updates keywords when revising policies to further assist staff with locating policies.

As noted earlier, DPSS is in discussion with Riverside County Information Technology (RCIT) regarding additional technological solutions (i.e., Microsoft SharePoint) to improve organizing, locating, searching, and accessing program and administrative policies, procedures, forms and related documents. A final determination of the appropriate solution is expected no later than December 30, 2016, with implementation planning to begin by January 2017.

**FINDING NO. 2:**

During the course of the Grand Jury's review of DPSS Administrative Policies and Procedures, it found the department does not have a system or policy in place for the periodic review and/or revision of policy to ensure policies and procedures remain current, accurate, and applicable. The Grand Jury also found evidence that specific requirements mandated by state and federal regulations, such as the Health Insurance Portability and Accountability Act (HIPAA), the Privacy Act of 1974, and the California/Welfare and Institution Code §5328 had not been incorporated into all applicable DPSS policies. The incorporation of these laws and regulations into DPSS operating policies and procedures is critical to protect the confidentiality of the client's legal, medical, and personal information.

**RESPONSE: Respondent agrees with the finding.**

Due to the volume of program and policy changes to be communicated to staff, it is accurate that DPSS has some older policies and procedures that need to be updated and/or deleted. The Department has been filling positions as funding permits in order to ensure that staff receives current and accurate information with which to perform their duties. The Department has a policy for HIPAA, the Privacy Act of 1974 and the California/Welfare and Institution Code §5328, and includes references to these requirements in other policies as needed. There may be some older policies that do not include these references.

**RECOMMENDATION NO. 2:**

Establish standards for the periodic review, revision, and approval of administrative policies and procedures at planned intervals, or when significant changes occur to ensure policies and procedures are current, accurate, and applicable. Update existing policies and procedures to ensure compliance with state and federal laws and regulations.

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**RESPONSE:** This recommendation has been partially implemented, with additional implementation in the future.

Each policy unit is taking steps to ensure that a process is in place for periodic review as well as compliance with current State and Federal laws and regulations. In some cases, the need for additional staffing was identified and is being addressed to enable the Department to keep up with the volume of new policies that need to be written as well as ensuring that existing policies are kept up to date.

DPSS will finalize a plan by December 31, 2016, for reviewing all existing policies to confirm compliance with current state and federal laws and regulations by June 30, 2017.

**FINDING NO. 3:**

Department Memorandums (DM) are not in compliance with administrative policies.

DPSS Policy 17-001 (dated 01-15-2003) *Department Written Communications* states:

*A DM is written when a requester is providing impacted staff with information that is needed immediately and is usually needed for a short duration. A short duration is defined as six months or less.*

The Grand Jury found that more than one hundred DMs were active for extensive periods of time. They are not removed from the DPSS intranet or converted to policy within six months. The Grand Jury found multiple DMs in the department policy manual which were more than 12 years old.

**RESPONSE:** Respondent agrees with the finding.

The DM serves as a mechanism to provide immediate direction to staff and remains in effect until a department policy can be developed and/or modified. Our desire is to have policy issued within six months or less; however, there are a variety of circumstances that have resulted in DMs remaining active for extended periods of time.

There are approximately 200 older DMs that are scheduled for review. The oldest DMs were issued to Adult Services staff, which has had the most limited staffing available to support policy development. It is only in the last few years that additional funding has been made available to hire staff to support Adult Services' policy development needs.

Another factor that impacts the development of policy is the timing of receiving clarifying information from the State. Depending on the complexity of the policy, there are often numerous questions raised by counties that require further analysis by the State. In order to provide clear direction to staff with as few iterations as possible, we often opt to wait for further guidance from the State.

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The Department also acknowledges that the overall volume of DMs and policies to be issued has exceeded our staff capacity, which has also impacted our ability to timely convert DMs to policy. DPSS is in the process of expanding staffing to keep up with the demand as well as to ensure that existing policies are kept current.

**RECOMMENDATION NO. 3:**

DMs that exceed the six month time frame be converted to a policy, assigned to a policy or deleted.

**RESPONSE: This recommendation has been partially implemented, with additional implementation in the future.**

Department Policy (DP) 17-001, Department Written Communication, will be revised to provide for a one-year approval for DMs, extendable for additional time for DMs that are temporary and/or are not appropriate for inclusion into the program or administrative policy manuals. The revision is expected to be released by December 2016.

By June 30, 2017, each policy unit will review all existing program DMs to:

- (1) incorporate existing DMs into the appropriate policy manual sections, obsoleting DMs that are incorporated, or
- (2) determine the need to extend or archive the remaining DMs, as appropriate.

**FINDING NO. 4:**

Acronyms used in administrative policies are not defined when first utilized and in some cases not spelled out. For example, the acronym PEPD is used on page 7 of Policy 17-001, *Department Written Communication*, but not spelled out until page 20 as "Planning and Evaluation Policy Development." According to this policy, "*acronyms must be completely written the first time used followed by the acronym in parenthesis.*"

**RESPONSE: Respondent agrees with this finding.**

The standards for policy writing instruct policy writers to spell out all acronyms at the first use, and use the acronym thereafter.

**RECOMMENDATION NO. 4:**

DPSS personnel responsible for developing and reviewing department policy be retrained on the proper use of acronyms. Department management to direct personnel to comply with DPSS Policy 17-001. Review and revise existing policies to ensure compliance with department policy on the use of acronyms. Devise a process for educating DPSS personnel on the use of acronyms and the dissemination of department policy containing acronyms to ensure policies are not misunderstood or misinterpreted.

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**Response: The recommendation has been implemented.**

DPSS recognizes the importance of providing clear communication to staff and is sensitive to the fact that acronyms are heavily used throughout the Department. DPSS has reinforced with staff and supervisors involved with policy writing and review the expectations that acronyms be spelled out completely the first time used. This information will also be included in the standardized training provided to staff that are responsible for developing and reviewing department program and administrative policy.

**FINDING NO. 5:**

The Grand Jury observed that policies under revision are identified on the DPSS intranet as "under construction." During that time, policy information is not available on the intranet, and the only accessibility to policies and procedures is through the use of office hard copies. Two of the six DPSS office locations did not have hard copies of administrative policies and procedures.

**RESPONSE: Respondent disagrees with this finding.**

The issue referenced relates to new policy being developed for Children Services. Based on the finding, it appears that there may have been some confusion. As new program policy needs are identified, Children Service's practice has been to label that new section of the policy manual as "Under Construction". This is only a placeholder for new program policies. Children Services staff continues to have access to all existing policies. Existing policies are not removed or obsoleted until they are replaced by an updated version.

**RECOMMENDATION NO. 5:**

Update the intranet so that policies and procedures under construction or revision remain valid and accessible until the updated policy has been approved and ready for distribution. Develop an electronic storage system such as a Compact Disk (CD) or USB Flash Drive that can be used as back-up when the intranet is not available for field support accessibility. Ensure outdated versions of policies and procedures are available to supervisors and administrators for historical and/or reference purposes.

**RESPONSE: This recommendation has not been implemented, but will be partially implemented in the future.**

In order to avoid any possible confusion, by December 31, 2016, Children Services Division plans to remove those sections that are labeled as "under construction" and leave them blank. Currently, those sections are placeholders for new policy to be created.

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Program policies and administrative policies are currently backed up via an electronic storage system. Previously released versions of program and administrative policies are maintained centrally and are available to supervisors and administrators for historical and/or reference purposes as needed upon request. This information is maintained centrally in order to ensure that only the most current policy information is being accessed. By September 30, 2016, supervisors and administrators will be sent a reminder of the availability of program and administrative policies for historical and/or reference purposes.

DPSS is in discussion with Riverside County Information Technology (RCIT) regarding additional technological solutions (i.e., Microsoft SharePoint) to improve organizing, locating, searching, and accessing program and administrative policy and procedures documents. A final determination of the appropriate solution is expected to be completed by December 30, 2016, with implementation planning beginning January 2017.

The recommendation to use a CD or Flash Drive for backup accessibility is not feasible for program or administrative policy due to the cost of maintaining and distributing up-to-date versions, and becomes unnecessary with centralized intranet and cloud storage technology.