



North Carolina Department of Health and Human Services Division of Social Services

2420 Mail Service Center • Raleigh, North Carolina 27699-2420

Beverly Eaves Perdue, Governor
Lanier M. Cansler, Secretary

Sherry S. Bradsher, Director
(919) 733-3055

February 5, 2010

Dear County Directors of Social Services

Attention: Work First Program Administrators, Managers, and Supervisors

Subject: Forms- Title VI Requirements

Several years ago the Office of Civil Rights (OCR) initiated a Title VI Compliance Review to determine if program policies and procedures unlawfully prevented immigrant access to public benefits. OCR reviewed county forms and expressed concerns that some forms developed by county departments of social services were not in compliance with Federal requirements of Title VI of the Civil Rights Act.

OCR requires the Division to reiterate to counties that locally developed forms must neither ask for nor suggest that non applicants, including financially responsible persons, must provide Social Security numbers or Citizenship/Immigration status information. These individuals can not be required to disclose this information as a condition of eligibility for individuals that are applying for benefits.

County departments of social services must review all in house forms to ensure that these requirements are met. If in house forms do not meet these requirements, they must be revised to be in compliance or removed from use. The county department of social services will need to document the date the form was revised or the date the form was removed from use. Counties must keep a copy of this information in the event OCR requires further review or proof of actions taken.

If the county develops a county form or modifies a State form, the county must submit the local form to dssweb@dhhs.nc.gov for review and compliance. The form number must also indicate that it is a modified form.

Please confirm in writing to the Division of Social Services that your agency has reviewed all locally developed and modified State forms to ensure compliance with the above requirements by **March 15, 2010**. Use the attached form to indicate when the review was completed and the type of action taken. Mail a signed copy to the address shown on the form.

To ensure continued compliance with OCR, all in house forms developed after the above date must be evaluated and certified for compliance. Your prompt attention to this matter is most appreciated. If additional guidance is needed, please contact your Work First Program Consultant.

Sincerely,



Dean Simpson, Chief
Economic and Family Services



Carlotta Dixon, NCDSS Title VI-Civil Rights
Compliance Coordinator

EFS-WF-05-2010

DS/sm

Attachment:
Compliance Review Form

cc: Sherry Bradsher
Jack Rogers
Sarah Barham
Hank Bowers
Charisse Johnson
Work First Program Consultants
Local Business Liaisons