



CDSS

MILL LIGHTBOURNE
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



EDMUND G. BROWN JR.
GOVERNOR

March 29, 2012

Mr. Paul G. Lake, Director
Sacramento County Department of Human Assistance
2433 Marconi Avenue
Sacramento, CA 95821

Dear Mr. Lake:

This letter is to advise you that the Corrective Action Plan you submitted on January 27, 2012, in response to the results of our 2011 Civil Rights Compliance Review is approved. We applaud your continued effort.

We will be monitoring the implementation of your corrective action items through your Civil Rights Coordinator.

If you have any questions, please contact Claudia Cabrera at (916) 654-2107. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

JIM TASHIMA, Chief
Civil Rights Bureau
Human Rights and Community Services Division

c: Mary Shuba, Civil Rights Coordinator

Linda Patterson, Branch Chief
CDSS CalFresh Program

Mike Papin, Chief
CalFresh Policy Bureau

Marlene Fleming, Chief
Field Operations Bureau

Brian Tam, Chief
CalFresh Management Operations Section

Paul Gardes
CalFresh Policy Bureau

Thuan Nguyen
Refugee Programs Bureau

Joe Torres, Office of Civil Rights
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Hope Rios,
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Jodie Berger, Regional Counsel
Legal Services of Northern California

Countywide Services Agency

Department of
Human Assistance

Paul G. Lake, Director

Gladys Deloney, Deputy Director

Kathryn Harwell, Deputy Director



Bradley J. Hudson, County Executive
Bruce Wagstaff, Administrator

County of Sacramento

FEB 06 2012

January 27, 2012

Jim Tashima, Chief
California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
Sacramento, CA 95814

Dear Mr. Tashima:

I would like to take this opportunity to thank your staff for coming to our office and sharing with us the findings of the Annual Civil Rights Compliance Review for 2011. The following sections identify areas found to be deficient during your review for compliance under the CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws and our plan for correction.

Civil Rights Compliance Review 2011
Summary of Findings and Corrective Action

III. DISSEMINATION OF INFORMATION

A. Findings

- The Fulton Avenue Office did not have the PUB 13 Braille, audio, or large print available in the lobby. The large print copy was being kept by a clerical supervisor who was not available on the day of the review. Copies of PUB 13 was displayed in the lobby in only the threshold languages and not in all available languages.
- Two of the 12 staff interviewed did not know the location of the PUB 86 poster with the civil rights coordinator's name on it.

Enriching people's lives by building bridges to better futures

B. Corrective Actions

Informational Element	Correction Action Required
Translated PUB 13	Sacramento County DHA shall ensure that the current version of the PUB 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language. Div. 21-115/2
Auxiliary aids	Sacramento County DHA shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.4

Corrective Action Plan

- The Fulton Avenue Office has requested the PUB 13 pamphlets in Braille, audio, and copies in all languages translated by CDSS. The regular pamphlets in all languages will be available in the lobby. The large print edition has been moved to the lobby clerical area and the Braille and audio versions will be kept there for easy access by clients and workers.
- An email has been issued to all department staff to remind them of the location of the PUB 86 poster with the civil rights coordinator’s name on it.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

A. Findings

Facility Location: 10013 Folsom Blvd

Facility Element	Findings	Corrective Action
Exterior entrance	Door Pressure Walking into the building: Double doors on the left are excessive with the left door measuring 15lbs and the right door measuring 11lbs. Double doors on the right are excessive with both doors measuring 12lbs each.	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207

<p>Client lobby</p>	<p>Door Pressure Double doors walking into the lobby are excessive, both measuring 10lbs each.</p> <p>Designated accessible counter at window is low at 22 ½”.</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</p> <p>Height of accessible tables or counters is between 28” – 34” from floor finish. (CA T24 1122B.4, ADA 4.32.4) p 388</p>
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<p>Restroom</p>	<p>Men’s Restroom:</p> <p>First Door: Door pressure is excessive at 11lbs.</p> <p>Second Door: Door pressure is excessive at 12lbs.</p> <p>Soap dispenser is high at 43”.</p> <p>Women’s Restroom:</p> <p>First Door: Door pressure is excessive at 10lbs.</p> <p>Second Door: Door pressure is excessive at 9lbs.</p> <p>Soap dispenser is high at 47½”.</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40”. (CA T24 1115B.8.3, ADA 4.23.7) p 294</p> <p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40”. (CA T24 1115B.8.3, ADA 4.23.7) p 294</p>
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Corrective Action Plan

Exterior and Client Lobby Doors

- Door pressure on the exterior and client lobby doors have been adjusted to 5 pounds maximum pressure. DHA will continue to periodically check door pressure and take corrective actions as necessary.

Client Lobby

- The Facility Manager from DHA General Services measured the designated accessible counter at 30 inches.

Restrooms

- Door pressure on men's and women's restrooms has been adjusted to 5 pounds maximum pressure. DHA will continue to periodically check door pressure and take corrective actions as necessary.
- Property Management is currently working on correcting the height of the soap dispensers in men's and women's restrooms. The work is scheduled to be completed by March 1, 2012.

Facility Location: 5747 Watt Ave

Facility Element	Findings	Corrective Action
Parking	There is no "Minimum Fine \$250.00" sign posted below the accessible symbol sign.	For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133
Telephone	The Public Pay Telephone does not have a volume control.	At least one in each telephone bank and a minimum of 25% of the total number of public telephones shall be equipped with a volume control and shall be hearing aid compatible. (CA T24 1117B.2.8, ADA 4.1.3.17(b)) p 273 Telephones with volume control shall be hearing aid compatible and identified with a sign. (CA T24 1117B.2.8 & 1117B.5.8.3, ADA 4.1.3.17(b)) p 273

Restroom	Men's Restroom: Door pressure is excessive at 15 lbs.	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207
	Women's Restroom: Door pressure is excessive at 20 lbs.	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207

Corrective Action Plan

Parking

- A "Minimum Fine \$250.00" sign has been posted below the accessible symbol sign.

Telephone

- The Public Pay Telephone is located at the opposite end of the building from the DHA public entrance, which is at the west end; it was not installed by nor is it paid for by DHA; it is next to a commercial entity occupying the east end of the building.

Restrooms

- Door pressure on men's and women's restrooms has been adjusted to 5 pounds maximum pressure. DHA will continue to periodically check door pressure and take corrective actions as necessary.

Facility Location: 2700 Fulton Ave

Facility Element	Findings	Corrective Action
Parking	<p>There is no "Minimum Fine \$250.00" sign posted below the accessible symbol sign.</p> <p>The words "No Parking" are faded and need to be repainted.</p>	<p>For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.3.2) p 135</p>

Restroom	Men's Restroom:	Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301
	Women's Restroom:	Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301

Corrective Action Plan

Parking

- "Minimum Fine \$250.00" signs will be posted on January 30, 2012
- Property Management repainted "NO PARKING" words in access aisles.

Restrooms

- Property Management is currently working on correcting the location of toilet tissue dispensers in men's and women's restroom. The work was completed on January 16, 2012.

Facility Location: 257 South Lincoln Way, Galt

Facility Element	Findings	Corrective Action
Exterior entrance	Door pressure is excessive at 15 lbs.	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207

<p>Restroom</p>	<p>Men's Restroom:</p> <p>Sign on wall is low at 54".</p> <p>Door pressure is excessive at 10 lbs.</p> <p>Women's Restroom:</p> <p>Sign on wall is low at 54".</p> <p>Door pressure is excessive at 10 lbs.</p>	<p>Door sign and wall sign shall be 60" above the floor to the center line of sign.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 281</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 282</p> <p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</p> <p>Door sign and wall sign shall be 60" above the floor to the center line of sign.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 281</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 282</p> <p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</p>
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Note: There are no interview rooms. Workers interview clients in their office. If accessible rooms are needed, workers will take clients to their multi-purpose conference room where there are tables and chairs that can easily be re-arranged.

When being escorted to this multi-purpose conference room, the reviewer noticed that there is a large cabinet located in the aisle leading to this conference room. Walking down this hall with the cabinet in the way only leaves a 28 ½” pathway. Clear width, minimum Civil Rights Compliance Review Sacramento Department of Human Assistance August 2011 13 clearance of a point is 32” (CA T24 1133B.1.1.1.1, ADA 4.13.5 and CA T24 1118B.1, ADA 4.21) pp197, 235. Although there is an alternate route to this room, it is advised to move this cabinet to another area allowing for a much wider path through the hallway.

Corrective Action Plan

Exterior Entrance

- Door pressure on the exterior door has been adjusted to 5 pounds maximum pressure. DHA will continue to periodically check door pressure and take corrective actions as necessary.

Restrooms

- The Facility Manager from DHA General Services will install additional signage with the proper placement. Completion expected by February 29, 2012.
- Door pressure on men’s and women’s restrooms has been adjusted to 5 pounds maximum pressure. DHA will continue to periodically check door pressure and take corrective actions as necessary.

Hallway

- The cabinet was been removed immediately after the review.

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH SPEAKING OR WHO HAVE DISABILITIES

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Comments
Does the county allow minors to be interpreters? If so, under what circumstances?	X		Only in an emergency and under an extenuating circumstance, workers will use a minor.

B. Corrective Actions

Area of Findings	Corrective Actions
Use of Minors	Sacramento County DHA shall only allow the use of a minor (under the age of 18 years) to temporarily act as an interpreter under extenuating circumstances or at the specific request of the applicant/recipient. Div. 21-115.16

Corrective Action Plan

Sacramento County DHA will continue to allow a minor to act temporarily as an interpreter only in emergencies under extenuating circumstances and/or at the specific request of the applicant/recipient.

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

A. Findings from Case File Reviews and Staff Interviews

Documented Item	CalWORKs & Employment Services	Non-Assistance CalFresh
Client provided own interpreter	None found in cases reviewed	None found in cases reviewed
Release of information to Interpreter	None found in cases reviewed	None found in cases reviewed

B. Corrective Actions

Areas of Action	Corrective Action
Temporary use of a minor (under 18 years of age) as an interpreter	When a minor (under 18 years of age) is used as an interpreter, the CWD shall so document the circumstances requiring temporary use of minors in the case record. Div. 21-116.22 Only under extenuating circumstances or at the specific request of the applicant/recipient shall a CWD allow a minor (under the age of 18 years) to temporarily act as an interpreter.
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22
General	Sacramento County DHA must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

Corrective Action Plan

Program Managers and Supervisors will add items to staff meeting agendas, and the civil rights coordinator will issue regular emails to all department staff, which will include a greater emphasis on the necessity of documentation in the appropriate places in CalWIN and FileNet.

VII. STAFF DEVELOPMENT AND TRAINING

A. Findings

No negative findings were reported.

Note: The civil rights coordinator will issue regular informational emails to all department staff to increase civil rights awareness and supplement the annual training.

VIII. DISCRIMINATION COMPLAINT PROCEDURE

A. Findings

Six out of 12 staff interviewed could not clearly identify what the difference between a program and personnel complaint.

Two of the 12 staff interviewed did not know the location of the PUB 86 poster with the civil rights coordinator's name on it.

B. Corrective Actions

Element	Corrective Action
Discrimination Process	Sacramento County Department of Human Assistance shall ensure that staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117.1
Civil Rights Coordinator	Sacramento County Department of Human Assistance shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Div. 21-117 and 21-107.21

Corrective Action Plan

The civil rights coordinator along with Staff Development Office will put a greater emphasis on policy and procedure for discrimination and program complaints during the Civil Rights Training at the Induction Class and the mandatory annual training.

On January 20, 2012, an email was sent to all department staff with the information that the PUB 86 poster is located in the lobby of the bureaus. The email also informed staff that the name of the current civil rights coordinator can be found on the poster.

Once again, on behalf of our staff, I thank you for your assistance in helping DHA to achieve compliance with Division 21 regulations. If there is any further information required regarding this Corrective Action Plan, please contact Mary E. Shuba, Civil Rights Coordinator, at (916) 648-0363.

Sincerely,

A handwritten signature in cursive script that reads "Paul G. Lake". The signature is written in black ink and is positioned above the typed name of the signatory.

Paul G. Lake, Director

c: Mary E. Shuba, Civil Rights Coordinator