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DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

November 22, 2013

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

Dear Mr. Lake:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of July 29 to August 2, 2013. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>

If you need technical assistance in the development of your CAP, please feel free to contact Mr. James Urquizo at (916) 654-2101. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

Original signed by Civil Rights Bureau Chief

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

Enclosure

c: Mary Shuba, Civil Rights Coordinator

Mike Papin, Chief
CalFresh Policy Bureau

Marlene Fleming, Chief
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
SACRAMENTO COUNTY DEPARTMENT
OF HUMAN ASSISTANCE**

**Conducted on
July 29 to August 2, 2013**

**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
(916) 654-2107**

Reviewer: James Urquizo

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Sacramento County Department of Human Assistance with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on June 29 to August 2, 2013. An exit interview was held on August 5, 2013, to review the preliminary findings.

The review was conducted in the following locations:

| Name of Facility | Address | Programs | Non-English languages spoken by a substantial number of clients (5% or more) |
|--------------------------------------------------|------------------------------|-------------------------------|------------------------------------------------------------------------------|
| Sacramento County Department of Human Assistance | 3960 Research Drive | CalWorks, Intake | Spanish |
| Sacramento County Department of Human Assistance | 2450 Florin Road | Calworks | Spanish |
| Sacramento County Department of Human Assistance | 4433 Florin Road | Calworks | Spanish |
| Sacramento County Department of Human Assistance | 1725 28 th Street | Calfresh | Spanish |
| Sacramento County Department of Human Assistance | 2007 19 th Street | Admin Hearing (facility only) | Spanish |
| Sacramento County Department of Human Assistance | 2001 19 th Street | CalWorks (Child Care) | Spanish |

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2012 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.
- Conducted a conference call with the Bay Area Legal Aid Group.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews

- Facility inspections
- Focus on issues brought up by the Bay Area Legal Aid Group.

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures
- Issues brought up by the Bay Area Legal Aid Group.

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

| Classifications | Total | Bilingual |
|------------------------|--------------|------------------|
| Eligibility Workers | 20 | 15 |
| Receptionist/Screeners | 4 | 3 |
| Total | 24 | 18 |

Program Manager Surveys

| | |
|-------------------------------|---|
| Number of surveys distributed | 5 |
| Number of surveys received | 5 |

Reviewed Case Files

| | |
|--------------------------------------------------------------|------------------|
| English speakers' case files reviewed | 10 |
| Non-English or limited-English speakers' case files reviewed | 70 |
| Languages of clients' cases | English, Spanish |

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section X highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XI of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

| Access to Services, Information and Outreach | Yes | No | Some-times | Comments |
|--------------------------------------------------------------------------------------------------------------|------------|-----------|-------------------|-----------------|
| Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in? | X | | | |
| Does the county have extended hours to accommodate clients? | X | | | |
| Can applicants access services when they cannot go to the office? | X | | | |
| Does the county ensure the awareness of available services for individuals in remote areas? | X | | | |

| Signage, posters, pamphlets | Yes | No | Some- times | Comments |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------|------------------------|----------------------------------------------------------------------------------------------------------------------|
| Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)? | X | | | |
| Is the pamphlet distributed and explained to each client at intake and re-certification? | X | | | |
| Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukranian, Vietnamese? | X | | | Threshold Pub 13's <u>are</u> on display in the lobby. Other Languages are being kept by lobby receptionists. |
| If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages? | X | | | |
| Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille? | X | | | |
| Were the current versions of the required posters present in the lobbies? | X | | | |
| Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address? | X | | | |
| Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated | X | | | |

| Signage, posters, pamphlets | Yes | No | Some- times | Comments |
|------------------------------------|------------|-----------|------------------------|-----------------|
| into appropriate languages? | | | | |

B. Corrective Actions

None

C. Observation

Sacramento County is utilizing the CDSS pamphlet “Your Rights Under California Welfare Programs” (Pub 13) in a highly visible manner. Required pub 13’s are being display clearly in the lobby where any client can access.

County staff is aware of Pub 13 Location and regularly read the Pub 13 to clients for comprehension.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

1. Facility Location: 3960 Research Drive

| Facility Element | Findings | Corrective Action |
|--------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Is there proper parking stall signage, either on wall or freestanding?</p> | <p>Five Disabled Parking signs at a height lower than the required 80" (68", 74", 76", 73" and 72")</p> | <p>When mounted on a post and in a path of travel, sign shall be posted at a minimum height of 80" min. from the bottom of the sign to the finished grade. (CA T24 1129B. 4) (ADA 4.6.4) p 134</p> |
| <p>Access aisle for accessible space minimum: 5' wide by 18' long?</p> | <p>There are two ramps that encroach into the disabled accessible aisle.</p> | <p>Ramps shall not encroach into any accessible parking space or the adjacent access aisle. (CA T24 1129B.3.3) (ADA 4.7.8)</p> |
| <p>Van-accessible signage mounted below symbol of accessibility and not obscured by vehicle in space?</p> | <p>One pole sign does not have the appropriate van-accessible sign.</p> | <p>Each van-accessible parking space shall have an additional sign or additional language that states "Van-Accessible" placed below the accessibility sign. (CA T4 1129B.4.2) (ADA 4.1.2 (5) (B), 4.6.4.) p 134</p> <p>Signs identifying accessible parking spaces shall be located so they cannot be obscured by a vehicle parked in the space. (CA T24 1129B.4) (ADA 4.6.4) p 134</p> |
| <p>Accessible parking space minimum: 9' wide by 18' long? Access aisle for accessible space minimum: 5' wide by 18' long?</p> | <p>One accessible parking aisle spot is missing the lines on the parking floor.</p> | <p>The loading and unloading access aisle shall be marked by a border painted blue. (CA T24 1129B.3.1)</p> <p>Within the blue border, hatched lines a maximum of 36" on center shall be painted a color contrasting with the parking surface preferably blue or white</p> |

| | | |
|-------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | (CA T24 1129B.3.1) |
| Directional signage to accessible entrance if not main entrance? | Directional signs directing clients to main accessible entrance to building are missing. | Signs shall indicate the direction to accessible building entrances and facilities, (CA T24 1117B.3) p 191, 400 Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2) (ADA 4.30.5) p 403 |

2. Facility Location: 2450 Florin Road

| Facility Element | Findings | Corrective Action |
|--------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Access aisle for accessible space minimum: 5' wide by 18' long? | There are four ramps that encroach into the disabled accessible aisle. | Ramps shall not encroach into any accessible parking space or the adjacent access aisle. (CA T24 1129B.3.3) (ADA 4.7.8) |
| Directional and Informational Signage Available in threshold languages? | <u>Dangerous Weapons</u> sign not in threshold language. <u>Health Care Options</u> sign not in threshold language. | All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212) |
| Pub 13 available in large print (06/11), Braille (12/04), audio | Receptionist questioned at counter did not have Pub 13 in braille, audio or | Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall |

| | | |
|---------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (05/01)? | know of "I Speak Cards" | be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (e.g., cassette tapes, large print, etc.). (Div. 21-107.221) |
| Client Interview Rooms and Booths | Building had 9 meeting rooms and 5 training stations. There were no disabled accessible rooms designated and in compliance. | Client and visitor areas and office areas, together with related toilet rooms shall be made accessible. (CA T24 1105B.3.2.1) Conference/counseling rooms, cubicles and similar areas shall be made accessible. (CA T24 1105B.3.2.2) |
| Client Interview Rooms and Booths In Interview Room(s) | One Disabled room had a client table that was 6" deep instead of the required 19" deep. | Minimum seating knee space is 27" high, 30" wide and 19" deep. (CA T24 1122B.3) (ADA 4.32.3) p 394 |
| Men's Restroom Door pressure 5 lbs. or less? | Men's Bathroom door pressure was 7 lbs. | Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 207 |
| Women's Restroom Door pressure 5 lbs. or less? | Women's Bathroom door pressure was 7 lbs. | Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 207 |
| Women's Restroom Pipes under sink securely insulated? | In Women's Restroom – 4 pipes under the sink are not wrapped and insulated. | Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. |

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| | | (CA T24 1115B.4.3.4) (ADA 4.19.4) p 296 |
|--|--|--------------------------------------------|

3. Facility Location: 4433 Florin Road

| Facility Element | Findings | Corrective Action |
|-----------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Access aisle for accessible space minimum: 5' wide by 18' long? | There is one ramp that encroaches into the disabled accessible aisle. | Ramps shall not encroach into any accessible parking space or the adjacent access aisle. (CA T24 1129B.3.3) (ADA 4.7.8) |
| Accessible parking space minimum: 9' wide by 18' long? Access aisle for accessible space minimum: 5' wide by 18' long? | All Disabled Parking Lines are difficult to see. Need to be repainted. | Parking space dimensions: 9' wide by 18' long. Access aisle dimensions: 5' wide by 18' long. (CA T24 1129B.3.1 &2) ADA 4.6.3) p 136 Dimension to centerline of stripes. (CA T24 1129B.3.1) p136 |

4. Facility Location: 1725 28th Street

| Facility Element | Findings | Corrective Action |
|--------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Is there unauthorized parking signage at entrance to off-street accessible parking? | One parking sign designating entry information into the parking lot was missing. (Big Parking lot in the back of the building.) | An additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. The sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away |

| | | |
|--|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | <p>at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____."</p> <p>Blank spaces are to be filled in with appropriate information as a permanent part of the sign.</p> <p>(CA T24 1129B.4) p 134</p> |
|--|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

5. Facility Location: 2007 19th Street

| Facility Element | Findings | Corrective Action |
|-----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Is there proper parking stall signage, either on wall or freestanding? | Four Disabled Parking signs at a height lower than the required 80" (73", 77" 75" 77") | When mounted on a post and in a path of travel, sign shall be posted at a minimum height of 80" min. from the bottom of the sign to the finished grade. (CA T24 1129B. 4) (ADA 4.6.4) p 134 |
| Van-accessible signage mounted below symbol of accessibility and not obscured by vehicle in space? | One sign does not have the appropriate van-accessible sign. | Each van-accessible parking space shall have an additional sign or additional language that states "Van-Accessible" placed below the accessibility sign. (CA T4 1129B.4.2) (ADA 4.1.2 (5) (B), 4.6.4.) p 134 Signs identifying accessible parking spaces shall be located so they cannot be obscured by a vehicle parked in the space. (CA T24 1129B.4) (ADA 4.6.4) p 134 |
| Street surface signage clearly depicts a wheelchair w/occupant? | Disabled wheelchair sign on parking spot, needs to be repainted. | Street surface Signage: The surface of each accessible parking stall or space must have a surface identification duplicating either of the following schemes: |

| | | |
|------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | <p>(a) By outlining or painting the stall or space in blue and outlining on the ground in the stall or space in white or suitable contrasting color a profile view depicting a wheelchair with occupant; OR (b) By outlining a profile view of a wheelchair with occupant in white on blue background.</p> <p>The profile view shall be located so that it is visible to a traffic enforcement officer when a vehicle is properly parked in the space and shall be 36" by 36". (CA T24 1129B.4.1 & 2) p 134</p> |
| <p>Access aisle for accessible space minimum: 5' wide by 18' long?</p> | <p>Access aisle lines difficult to view. Needs repainting.</p> | <p>The loading and unloading access aisle shall be marked by a border painted blue. (CA T24 1129B.3.1)</p> <p>Within the blue border, hatched lines a maximum of 36" on center shall be painted a color contrasting with the parking surface preferably blue or white (CA T24 1129B.3.1)</p> |
| <p>Van-accessible signage mounted below symbol of accessibility and not obscured by vehicle in space?</p> | <p>One van accessible disable parking sign had tree branches blocking the signs visibility. There should be clear line-of-sight visibility of the sign.</p> | <p>Each van-accessible parking space shall have an additional sign or additional language that states "Van-Accessible" placed below the accessibility sign. (CA T4 1129B.4.2) (ADA 4.1.2 (5) (B), 4.6.4.) p 134</p> <p>Signs identifying accessible parking spaces shall be located so they cannot be obscured by a vehicle parked in the space.</p> |

| | | |
|-------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | (CA T24 1129B.4) (ADA 4.6.4) p 134 |
| Directional signage to accessible entrance if not main entrance? | There are no directional signs that clearly show clients to the main entry. | Signs shall indicate the direction to accessible building entrances and facilities, (CA T24 1117B.3) p 191, 400 Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2) (ADA 4.30.5) p 403 |
| Accessible parking space minimum: 9' wide by 18' long? Access aisle for accessible space minimum: 5' wide by 18' long? | All Disabled Parking Lines are difficult to see. Need to be repainted. | The loading and unloading access aisle shall be marked by a border painted blue. (CA T24 1129B.3.1) Within the blue border, hatched lines a maximum of 36" on center shall be painted a color contrasting with the parking surface preferably blue or white (CA T24 1129B.3.1) |
| Directional and Informational Signage Available in threshold languages? | At front of Building – Hours of Business needs to be in Threshold Language(s). | All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div 21-107.212) |

| | | |
|--------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Persons with disabilities forced to go behind cars?</p> | <p>Disabled Parked clients are forced to unsafely go behind numerous cars to get to the front entrance to the building. No access aisles available.</p> | <p>The space shall be located so the disable are not forced to wheel or walk behind parking spaces other than their own accessible parking space. (CA T24 1129B.3.3) p 136</p> |
| <p>Do access aisles connect to the accessible path of travel?</p> | <p>Disabled Parked clients are forced to unsafely go behind numerous cars to get to the front entrance to the building. No access aisles available.</p> | <p>The parking access aisles shall be part of an accessible route of travel to the building or facility entrance. (CA T24 1129B.3.1) p 137</p> |
| <p>Is parking located as close as possible to entrance?</p> | <p>Disabled Parked clients are forced to unsafely go behind numerous cars to get to the front entrance to the building. No access aisles available.</p> | <p>Accessible parking spaces serving a particular building shall be located on the shortest available route of travel from adjacent parking to an accessible entrance. (CA T24 1129B.1)(ADA 4.6.2) p 135</p> <p>In parking facilities that do not serve a particular building, accessible parking shall be located on the shortest accessible pedestrian entrance of the parking facility. (CA T24 1129B.1) (ADA 4.6.2) p 135</p> <p>In building with multiple accessible entrances, with adjacent parking, accessible parking spaces shall be dispersed and located closest to the accessible entrances. (CA T24 1129B.1) (ADA 4.6.2) p 135</p> |

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

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

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

| Question | Yes | No | Some-times | Comments |
|-----------------------------------------------------------------------------------|------------|-----------|-------------------|-------------------------------------------------------------------------------------------------------|
| Does the county identify a client's language need upon first contact? How? | X | | | Yes, at intake any special needs are identified and documented in a SOC 295 and a 8072 Language form. |
| Does the county use a primary language form? | X | | | Yes, the County uses a SOC 295 and a 8072 Language form. |
| Does the client self-declare on this form? | X | | | |
| Are non-English- or limited- English- | | | | In-House Certified Translators and contracted telephonic |

| Question | Yes | No | Some-times | Comments |
|--------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| speaking clients provided bilingual services? | X | | | Language line services are utilized when needed. |
| After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter? | X | | | In-House Certified Translators and contracted telephonic Language line services are utilized when needed. |
| Is there a delay in providing services? | | X | | |
| Does the county have a language line provider, a county interpreter list, or any other interpreter process? | X | | | In-House Certified Translators and contracted telephonic Language Line services are utilized when needed. |
| Are county interpreters determined to be competent? | X | | | Yes, In-House Translators are certified |
| Does the county have adequate interpreter services? | X | | | Yes, SAC County has very good translation services. In House translators are competent and the Language Line services are used very well. |
| Does the county allow minors to be interpreters? If so, under what circumstances? | | X | | There is a current County policy to <u>not</u> allow minors under 18 to interpret for a client. |
| Does the county allow the client to provide his or her own interpreter? | X | | | If a client strongly wants to provide his/her own interpreter, it is allowed, but they are advised of the possible loss of information by using a non- |

| Question | Yes | No | Some- times | Comments |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | | | certified translator. |
| Does the county ensure that the client-provided interpreter understands what is being interpreted for the client? | X | | | The County does its best to insure information is delivered as clearly as possible. |
| Does the county use the CDSS-translated forms in the clients' primary languages? | X | | | The county uses most CDSS provided translated forms regularly in client's primary language In over 95% of the cases reviewed. |
| Is the information that is to be inserted into NOA translated into the client's primary language? | X | | | Yes, workers are insuring that NOAs are translated and inserted into the NOAs when necessary. |
| Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)? | X | | | The County has outstanding auxiliary aids and services, like font enlargement screens, dual telephonic translation lines, braille and height rising desktops. |
| Does the county identify and assist the client who has learning disabilities or a client who cannot read or write? | X | | | Based on telephone interviews and personal on-site questions, workers are making efforts to insure clients are assisted when they can not read or write. There is still a lack of understanding identifying clients with learning disabilities. |

| Question | Yes | No | Some-times | Comments |
|------------------------------------------------------------------------------------------|-----|----|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Does the county offer screening for learning disabilities? | X | | | From Interviews and conversations with staff - there is a lack of understanding concerning screening clients with learning disabilities. There is a management understanding of the need to refer clients to Community Mental Health services and to local behavioral providers, but all staff need to be regularly trained on this process. |
| Is there an established process for offering screening? | X | | | No process was clearly identifiable during the staff interviews. Management has an understanding of the need to offer screening but staff needs to be appraised regularly of this process. |
| Is the client identified as having a learning disability referred for evaluation? | X | | | No clear and concise program is visible that offers screen for a learning disability. |

B. Recommendation

The Sacramento County Department of Human Assistance needs to develop and implement a clear and decisive program to assist all clients with any possible learning disability needs. Staff needs to be regularly trained on this requirement and where to specifically refer clients to if a learning disability is detected. Staff needs to clearly document this process in the clients file or online.

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

| Documented Item | CalWorks (Child Care) | CalWORKs & Employment Services | Non-Assistance CalFresh |
|---------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| Ethnic origin documentation | Ethnicity is being identified at intake | CalWin | Ethnicity is being identified at intake |
| Primary language documentation | Primary language is being identified at intake | FS 27 Primary language | FS 27 Primary language |
| Method of providing bilingual services and documentation | Bilingual Services are identified at intake and documented in case comments CWS/CMS | Bilingual Services are identified at intake and documented in CalWin | Bilingual Services are identified at intake and documented in CalWin |
| Client provided own interpreter | Did not find evidence that the County is inappropriately using younger than 18 as translators. | Did not find evidence that the County is inappropriately using younger than 18 as translators. | Did not find evidence that the County is inappropriately using younger than 18 as translators. |
| Method to inform client of potential problem using own interpreter | As seen in documentation, County workers are informing clients of potential problems using their own interpreter. | As seen in documentation, County workers are informing clients of potential problems using their own interpreter. | As seen in documentation, County workers are informing clients of potential problems using their own interpreter. |
| Release of information to Interpreter | As seen in documentation, County workers are documenting and aware to safeguard client | As seen in documentation, County workers are documenting and aware to safeguard client | As seen in documentation, County workers are documenting and aware to safeguard client |

| Documented Item | CalWorks (Child Care) | CalWORKs & Employment Services | Non-Assistance CalFresh |
|-------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | information as identified in case files and online | information as identified in case files and online | information as identified in case files and online |
| Individual's acceptance or refusal of written material offered in primary language | In approximately 95% of cases viewed documentation was found in case files and online, where the client accepted or refused written materials in their language. | In approximately 95% of cases viewed documentation was found in case files and online, where the client accepted or refused written materials in their language. | In approximately 95% of cases viewed documentation was found in case files and online, where the client accepted or refused written materials in their language. |
| Documentation of minor used as interpreter | In 95% of cases viewed, the County has a policy to not admit anyone younger than 18 to serve as an interpreter. There were references in case comments about advising the client on usage of a minor as an interpreter. | In 95% of cases viewed, the County has a policy to not admit anyone younger than 18 to serve as an interpreter. There were references in case comments about advising the client on usage of a minor as an interpreter | In 95% of cases viewed, the County has a policy to not admit anyone younger than 18 to serve as an interpreter. There were references in case comments about advising the client on usage of a minor as an interpreter. |
| Documentation of circumstances for using minor interpreter temporarily | In 95% of cases viewed, the County has a policy to not admit anyone younger than 18 to serve as an interpreter. There were | In 95% of cases viewed, the County has a policy to not admit anyone younger than 18 to serve as an interpreter. | In 95% of cases viewed, the County has a policy to not admit anyone younger than 18 to serve as an interpreter. There were |

| Documented Item | CalWorks (Child Care) | CalWORKs & Employment Services | Non-Assistance CalFresh |
|--------------------------------------------------|------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| | references in case comments about advising the client on usage of a minor as an interpreter | There were references in case comments about advising the client on usage of a minor as an interpreter | references in case comments about advising the client on usage of a minor as an interpreter |
| Method of identifying client's disability | Clients disability was being identified at intake, documented in case file comments and online | Clients disability was being identified at intake, documented in case file comments and online | Clients disability was being identified at intake, documented in case file comments and online |

B. Corrective Actions

None

C. Recommendation

None

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

| Interview questions | Yes | No | Some-times | Comments |
|-------------------------------------------------------------|-----|----|------------|-------------------------------------------------------------------------------------------|
| Do employees receive continued Division 21 Training? | | X | | From conducting and reviewing the staff interviews, it is observed that Civil Rights (CR) |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------|---|--|--|---------------------------------------------------------------|
| | | | | training <u>does not get accomplished on a regular basis.</u> |
| Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint? | X | | | |
| Does the county provide employees Cultural Awareness Training? | X | | | |
| Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)? | X | | | |
| Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area? | X | | | |

B. Corrective Actions

| Training Area | Corrective Action |
|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Division 21, Civil Rights Training | SAC County shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1 |

C. Recommendation

None

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

| Interview and review areas | Yes | No | Some-times | Findings |
|--------------------------------------------------------------------------------------------------------------------------------------|-----|----|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Can the employees easily identify the difference between a program, discrimination, and a personnel complaint? | X | | | |
| Did the employees know who the Civil Rights Coordinator is? | X | | | |
| Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint? | X | | | |
| When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date? | X | | | |
| Is the County utilizing correct correspondence to address the final results to the complainant after the investigation is completed? | | X | | The county did not submit an investigation report after a discrimination complaint, and did not send an appropriate closure letter to the client containing appeal information. Div. 21-117.1 |

B. Corrective Action

Correctly address all complainants at the completion of the investigation, following Division 21 regulations and the guidance document provided by CDSS Civil Rights Bureau..

Division, 21-203, .263, .264 - APPLICANT/RECIPIENT COMPLAINTS OF DISCRIMINATORY TREATMENT,

C. Recommendation

CRC re-training needed. (available through CDSS CRB.)

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Sacramento County Department of Human Assistance Civil Rights Compliance Plan for the period June 1, 2013 through May 31, 2014, was received on July 1, 2013. It is approved as submitted.

X. COMMUNITY INPUT

The reviewer received, via email, observations from a representative from the Legal Services of Northern California, Stephen Goldberg. A copy of the written input is provided as Exhibit 1 of this report. The concerns expressed by the representative are consistent with discussion and audit items presented in this report (see Exhibit 1 below)

A. LANGUAGE ACCESS

- Sacramento County DHA is not providing interpreters for verbal communication or using a telephone interpretation service for languages that do not have translated documents. In the last few months I have spoken to clients or heard from service providers that interpreters or telephone interpretation was not provided for Marshallese, Hmong and Karen speaking clients.

B. REVIEWER OBSERVATIONS

- For the most part - The Sacramento County Department of Human Assistance is providing timely interpretative services. The County has professional certified translation and Interpretation staff in-house and when needed utilizes a reliable phone system to connect with contracted telephonic translation services. Staff workers make concerted efforts to translate documents in the client's

language(s). The County will check with its contracted interpretative service (language line) and confirm that all languages frequently used can be interpreted.

XI. CONCLUSION

The CDSS reviewer found the Sacramento County Department of Human Assistance staff warm, welcoming, informative and very supportive. Particular thanks to Mary Shuba, Civil Rights Coordinator - for organizing the details of the review, and to each Facilities Manager, who assisted in each of the facility reviews. In each District Office staff, were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Sacramento County Department of Human Assistance in substantial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The Sacramento County Department of Human Assistance must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.