



CDSS

WILL 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

June 13, 2014

Paul 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 submitted on January 24, 2014 and with an update on May 27, 2014 in response to the results of our August 2013 Civil Rights Compliance Review is approved.

If you have any further questions, please contact Mr. James Urquizo at (916) 654-2101 or by e-mail at James.Urquizo@dss.ca.gov.

Sincerely,

Original signed by Bureau Chief

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

c: Kathryn Montoya, Civil Rights Coordinator

c: Mike Papin, Chief
CalFresh Policy Bureau

John Mason, Chief
Field Operations Bureau

Sysvanh Kabkeo, Chief
CalFresh Management Operations Section

Taadhimeka Haynes
Staff Services Manager I

Paul Gardes
CalFresh Policy Bureau

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Refugee Programs Bureau

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

Jodie Berger, Regional Counsel
Legal Services of Northern California

Department of Human Assistance

Paul G. Lake, Director



Divisions

Employment & Supportive Services
Administration & Financial Management

County of Sacramento

January 24, 2014

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 2013. 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 2013
Summary of Findings and Corrective Action

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			

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

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.

Comment

The report states that only threshold language Pub 13s are on display in the lobby, that other languages are being kept by lobby receptionists. All of DHA's lobbies display Pub 13 in all of the languages that CDSS provides; only Braille, Large Print and CDs are kept by lobby receptionists in their work areas. During the review, the CRC confirmed the display of Pub 13 in all of the languages that CDSS provides.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

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.</p> <p>(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.</p> <p>(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.</p> <p>(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> <p>(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.</p> <p>(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> <p>(CA T24 1129B.3.1)</p>
<p>Directional signage to accessible entrance if not main entrance?</p>	<p>Directional signs directing clients to main accessible entrance to building are</p>	<p>Signs shall indicate the direction to accessible building entrances and facilities,</p>

	missing.	(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
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Corrective Action Plan

The Facility Manager has submitted requests and is working with Property Management to:

- Raise all parking stall signage to the minimum 80” requirement
- Correct the ramps to not encroach into the disabled accessible aisle
- Install a Van Accessible sign
- Paint the loading and unloading access aisle border and interior in blue

The Facility Manager has requested quotes from sign manufacturers to make and install directional signs.

All of the corrections will be completed by February 28, 2014.

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 (05/01)?	Receptionist questioned at counter did not have Pub 13 in braille, audio or know of "I Speak Cards"	Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall 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	In Women's Restroom – 4 pipes under the sink	Hot water and drain pipes are insulated or covered. No sharp or

securely insulated?	are not wrapped and insulated.	abrasive surfaces under lavatories. (CA T24 1115B.4.3.4) (ADA 4.19.4) p 296
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Corrective Action Plan

The Facility Manager has submitted requests and is working with Property Management to:

- Correct the ramps to not encroach into the disabled accessible aisle
Completion expected by June 30, 2014.

The Facility Manager will post signs in threshold languages (“Dangerous Weapons” and “Health Care Options”) no later than January 31, 2014.

The Facility has only 3 meeting rooms (not 9) available to clients. During the review, signs were added, and seen by the reviewer, to designate ADA accommodations on the tables/training stations.

The reviewer discussed with the Facility Managers the extra interview room that had been designated an ADA room and contains the table not in compliance. The room is being reviewed for possible reconfiguration; if that is not possible, the designation will be removed. The Facility has an ADA interview room that is in compliance.

Requests to reset the door pressure on the bathroom doors and to rewrap the pipes under the sink were submitted on July 31 and completed on August 13, 2013.

No later than January 31, 2014, the CRC will issue instructions to the DHHS Home Care Options staff, at the first desk inside the door, to direct DHA customers to the DHA reception counters where they will have access to Pub 13 versions in Large Print, Braille and audio, and where the staff have access to “I Speak Cards.”

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	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)

18' long?		p 136 Dimension to centerline of stripes. (CA T24 1129B.3.1) p136
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Corrective Action Plan

The Facility Manager has submitted requests and is working with Property Management to:

- Correct the ramp to not encroach into the disabled accessible aisle
- Repaint all Disabled Parking lines

Completion of work is expected no later than June 30, 2014.

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.)	<p>An additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space.</p> <p>The sign shall be 17” by 22” min. in size with lettering 1” min. high, stating:</p> <p>“Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away 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>

Corrective Action Plan

The Facility Manager requested and received quotes for the sign. Installation will be completed no later than February 28, 2014.

5. Facility Location: 2007 19th Street

Facility Element	Findings	Corrective Action
<p>Is there proper parking stall signage, either on wall or freestanding?</p>	<p>Four Disabled Parking signs at a height lower than the required 80" (73", 77" 75" 77")</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.</p> <p>(CA T24 1129B. 4) (ADA 4.6.4) p 134</p>
<p>Van-accessible signage mounted below symbol of accessibility and not obscured by vehicle in space?</p>	<p>One 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>Street surface signage clearly depicts a wheelchair w/occupant?</p>	<p>Disabled wheelchair sign on parking spot, needs to be repainted.</p>	<p>Street surface Signage: The surface of each accessible parking stall or space must have a surface identification duplicating either of the following schemes:</p> <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</p> <p>(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</p>

		<p>traffic enforcement officer when a vehicle is properly parked in the space and shall be 36" by 36".</p> <p>(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> <p>(CA T24 1129B.4) (ADA 4.6.4) p 134</p>
<p>Directional signage to accessible entrance if not main entrance?</p>	<p>There are no directional signs that clearly show clients to the main entry.</p>	<p>Signs shall indicate the direction to accessible building entrances and facilities, (CA T24 1117B.3) p 191, 400</p> <p>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</p>

<p>Accessible parking space minimum: 9' wide by 18' long?</p> <p>Access aisle for accessible space minimum: 5' wide by 18' long?</p>	<p>All Disabled Parking Lines are difficult to see. Need to be repainted.</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>Directional and Informational Signage Available in threshold languages?</p>	<p>At front of Building – Hours of Business needs to be in Threshold Language(s).</p>	<p>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>
<p>Persons with disabilities forced to go behind cars?</p> <p>Do access aisles connect to the accessible path of travel?</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>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>Disabled Parked clients are forced to unsafely go behind numerous cars to get to the front entrance</p>	<p>The space shall be located so the disabled 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>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>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>

	to the building. No access aisles available.	<p>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>
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Corrective Action Plan

The Facility Manager submitted requests, and the following work has been completed:

- Raise all parking stall signage to the minimum 80” requirement (9/3/2013)
- Repaint wheelchair sign on Disabled Parking Space (9/7/2013)
- Repaint the loading and unloading access aisle border and interior in blue in all Disabled Parking Spaces (9/7/2013)
- Remove tree branches obscuring the Disabled Parking Space sign (8/21/2013)
- Post signs designating direction to accessible building entrances (8/26/2013)
- Post Business Hours signs in threshold languages (8/26/2013)

The Facility Manager submitted a request and received approval to install aisles to complete an accessible route of travel to the facility entrance. Completion is expected by January 31, 2014.

“One in every 8 accessible spaces must be van accessible” (CA T24 1129B.3.1) p 138. The facility has a total of 5 designated Disabled Parking Spaces next to the building, and one of them is van accessible and designated with the appropriate sign.

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	Some-times	Comments
Does the county				Yes, at intake any special needs

Question	Yes	No	Some-times	Comments
identify a client's language need upon first contact? How?	X			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-speaking clients provided bilingual services?	X			In-House Certified Translators and contracted telephonic 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,				There is a current County policy to <u>not</u> allow minors under 18 to interpret for a client.

Question	Yes	No	Some-times	Comments
under what circumstances?		X		
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-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	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

Question	Yes	No	Some-times	Comments
write?				is still a lack of understanding identifying clients with learning disabilities.
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.

Corrective Action Plan

DHA Executive Management will direct the development and publication of a written procedure by June 30, 2014. Initially Program Managers and Supervisors will train their individual staff. The procedure will be included in the 2014 Annual Civil Rights Training that is mandatory for all staff and included in the New Hire Training.

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Corrective Actions: None

Recommendation: None

VII. STAFF DEVELOPMENT AND TRAINING

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

B. Recommendation: None

Corrective Action Plan

Mandatory Civil Rights Training is done on an annual basis. In 2011, an online training was developed and conducted in September and October of that year. The 2012 Training was conducted beginning in December 2012. The 2013 Training was conducted October through December 2013. All new staff receives in person training from the CRC during their Induction Classes. Individual completions of the trainings are automatically tracked online.

DHA Civil Rights Annual and New Hire Trainings meet the specific criteria of Div. 21-117.1

The CRC will increase the number of reminder/update emails to all staff and the number of Announcement Bulletins published on the DHA internal website. The CRC will remain available to staff by phone and email, and by meeting personally with staff as requested.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

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.

Interview and review areas	Yes	No	Some-times	Findings
				Div. 21-117.1

A. 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,

B. Recommendation

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

Corrective Action Plan

The CRC erred in not sending the report to CDSS-CRB and not including the CDSS-CRB information in the letter sent to a client. The CRC has reviewed the manual and procedures and will follow them. The CRC will request additional training.

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.

Comment

The Sacramento County Department of Human Assistance Civil Rights Compliance Plan for the period June 1, 2013 through May 31, 2014 was submitted on May 9, 2013.

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.

Comment

The current on-site interpretation and document translation contracts were originally issued 04/01/2011. They have been extended and are due to expire on 03/31/2014. Confirmation that all languages frequently used can be interpreted will be reviewed at the time of contract renewal. Specific information on interpretation/translation contract contacts was given to all staff in an Announcement Bulletin published on the DHA internal website most recently on November 8, 2013.

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) 876-4287.

Sincerely,

Original signed by Director

Paul G. Lake, Director

c: Mary E. Shuba, Civil Rights Coordinator

COUNTY OF SACRAMENTO

Memorandum

June 23, 2014

TO: James Uргуizo
FROM: Dawn Mason
Department of Human Assistance
SUBJECT: SAC DHA CAP 2013

Per your request, June 23, 2014, I'm resending Kathryn Montoya's status update of SAC DHA CAP 2013 to you as a Word document. Below is the response Kathryn sent to you via email on May 27, 2014.

Section of CAP: IV. A. 1. (pg. 4 and 5 of review sheets)

Location: 3960 Research Drive

Issue: The Facility Manager has submitted requests and is working with Property Management to:

- Raise all parking stall signage to the minimum 80" requirement
- Correct the ramps to not encroach into the disabled accessible aisle
- Install a Van Accessible sign
- Paint the loading and unloading access aisle border and interior in blue

The Facility Manager has requested quotes from sign manufacturers to make and install directional signs.

All of the corrections will be completed by February 28, 2014.

State Question: Have these items been corrected?

County Response: The signs are installed as specified above. County Real Estate and the lessor are aware of the request to correct the ramps and re-paint. However, the work is not completed and there is no timeline communicated from the lessor whether there is intention to complete the request. Costs are a factor and lessors believe that they are within County/City code requirements. DHA does not have the power or authority to enforce such

changes. However, if there is a new lease, they can be included as part of a negotiated item.

Section of CAP: IV. A. 2. (pg. 6 of review sheets)

Location: 2450 Florin Road

Issue: The Facility Manager has submitted requests and is working with Property Management to:

- Correct the ramps to not encroach into the disabled accessible aisle
Completion expected by June 30, 2014.

State Question: Has this date changed?

County Response:

This work has not been completed and the issue is with lessor. The lessor and County Real Estate have been aware of this request for many years now. This lessor can not afford to do this work at this time. DHA can not pay for this work and the lessor owes DHA for work already paid for by DHA through the lease that has not been completed by the lessor.

Section of CAP: IV. A. 2. (pg. 6 of review sheets)

Location: 2450 Florin Road

Issue: The Facility Manager will post signs in threshold languages (“Dangerous Weapons” and “Health Care Options”) no later than January 31, 2014.

State Question: Has this item been corrected?

County Response:

Yes. It was done during the actual audit and James signed off on it. We put international symbol for weapons. “Health Care Options” is a title and doesn’t need to be translated just like “Department of Human Assistance”.

Section of CAP: IV. A. 2. (pg. 6 of review sheets)

Location: 2450 Florin Road

Issue: Requests to reset the door pressure on the bathroom doors and to rewrap the pipes under the sink were submitted on July 31 and completed on August 13, 2013.

State Question: Have these items been corrected?

County Response: Yes. The CAP says it was done on August 13, 2013.

Section of CAP: IV. A. 2. (pg. 6 and 7 of review sheets)

Issue: No later than January 31, 2014, the CRC will issue instructions to the DHHS Home Care Options staff, at the first desk inside the door, to direct DHA customers to the DHA reception counters where they will have access to Pub 13 versions in Large Print, Braille and audio, and where the staff have access to "I Speak Cards."

State Question: Has this item been corrected?

County Response: Yes. We already had "I Speak Cards" but non-DHA staff, (Health Care Options) weren't aware that they are available at the reception windows. They know now.

Section of CAP: IV. A. 3. (pg. 7 of review sheets)

Location: 4433 Florin Road

Issue: The Facility Manager has submitted requests and is working with Property Management to:

- Correct the ramp to not encroach into the disabled accessible aisle
- Repaint all Disabled Parking lines

Completion of work is expected no later than June 30, 2014.

State Question: Have these items been corrected?

County Response: No. The lessor believes that they are grandfathered in under old code and do not have to correct the ramps.

Repainting of disabled parking lines is scheduled to be completed by July 31, 2014.

Section of CAP: IV. A. 4. (pg. 7 and 8 of review sheets)

Location: 1725 28th Street

Issue: The Facility Manager requested and received quotes for the sign. Installation will be completed no later than February 28, 2014.

State Question: Has this item been corrected?

County Response: Yes.

Section of CAP: IV. A. 5. (pg. 11 of review sheets)

Location: 2007 19th Street

Issue: The Facility Manager submitted requests, and the following work has been completed:

- Raise all parking stall signage to the minimum 80" requirement (9/3/2013)
- Repaint wheelchair sign on Disabled Parking Space (9/7/2013)
- Repaint the loading and unloading access aisle border and interior in blue in all Disabled Parking Spaces (9/7/2013)
- Remove tree branches obscuring the Disabled Parking Space sign (8/21/2013)
- Post signs designating direction to accessible building entrances (8/26/2013)
- Post Business Hours signs in threshold languages (8/26/2013)

The Facility Manager submitted a request and received approval to install aisles to complete an accessible route of travel to the facility entrance. Completion is expected by January 31, 2014.

County Response: Completed on 1-23-14.
All the above dates are dates of completion.

Section of CAP: V. B. (pg. 14 of review sheets)

Issue: DHA Executive Management will direct the development and publication of a written procedure by June 30, 2014. Initially Program Managers and Supervisors will train their individual staff. The procedure will be included in the 2014 Annual Civil Rights Training that is mandatory for all staff and included in the New Hire Training.

State Question: How is this going? Has this date changed?

County

Response: Kathryn Montoya met with the Bureau Program Managers to discuss the Corrective Action Plan. By June 15, 2014, Program Managers will ensure that their Bureau Supervisors re-address with their staff, sensitivity to potential learning disabilities of their clients. For example:

1. It is noted that workers can not ask about the nature of a disability or ask a person if they are disabled. Workers must not make case comments that diagnose or identify a specific disability.
2. In some programs, the client has the ability to use a form to self-identify a disability where they may require assistance. Workers will note if the client has used a form or has verbally self-identified any disability, including learning disabilities that may require assistance from DHA staff or other qualified individuals. Such assistance will be provided.
3. Workers will pay attention to paperwork the client is submitting and/or check in with the client to see if the client is understanding the process.
4. Workers may ask the client if they need help filling out documents or understanding the forms. If so, workers will provide the assistance or ensure that the client gets needed assistance in a timely manner.
5. Case comments will be made about the type of assistance that the client may need. Staff will ensure that they review the case for this information when assisting clients.

Dawn Mason will work with SDO and Training Partner to incorporate the above information and procedures into the Annual Civil Rights Training. This training is given at new employee induction, as well as, annually.

Section of CAP: X. B. (pg. 17 of review sheets)

Issue: The current on-site interpretation and document translation contracts were originally issued 04/01/2011. They have been extended and are due to expire on 03/31/2014. Confirmation that all languages frequently used can be interpreted will be reviewed at the time of contract renewal. Specific information on interpretation/translation contract contacts was given to all staff in an Announcement Bulletin published on the DHA internal website most recently on November 8, 2013.

State Question: Has the site interpretation and document translation contract been reviewed? Do you have a current contract active?

County**Response:**

Please see contract information below. DHA is diligent in keeping the interpretation and translation contracts active.

Contract #	Vendor	Issued	Expires
MA00027114	ALL GLOBAL SOLUTIONS	10/1/2013	9/30/2014
MA00027117	INTERNATIONAL LANGUAGE INTERPRETERS	10/1/2013	9/30/2014
MA00029693	CARMAZZI GLOBAL SOLUTIONS	1/1/2014	12/31/2014
MA00029694	LANGUAGE LINE LLC	1/1/2014	12/31/2014
MA00029695	PACIFIC INTERPRETERS INC	1/1/2014	12/31/2014
WA00027030	ALL GLOBAL SOLUTIONS	10/1/2013	9/30/2014
WA00027031	CARMAZZI GLOBAL SOLUTIONS	10/1/2013	9/30/2014
WA00027032	EASTERN EUROPEAN INTERPRETERS	10/1/2013	9/30/2014
WA00027033	LANGUAGE WORLD	10/1/2013	9/30/2014
WA00030949	A SHOW OF HANDS	10/1/2013	9/30/2014
WA00030950	CLASS ACT ALLIANCE INC	10/1/2013	9/30/2014
WA00030951	EATON INTERPRETING SERVICES INC	10/1/2013	9/30/2014
WA00030952	NORCAL SERVICES FOR DEAF & HARD OF HEARING	10/1/2013	9/30/2014
WA00030953	SIGN LANGUAGE INTERPRETING	10/1/2013	9/30/2014