



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

May 17, 2012

Trent Rhorer, Executive Director
City & County Department of Human Services Agency
P.O. Box 7988
San Francisco, CA 94120-7988

Dear Mr. Rhorer:

This letter is to advise you that the Corrective Action Plan submitted on May 16, 2012, in response to the results of our March 14-18, 2011 Civil Rights Compliance Review is approved.

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

If you have any questions, please contact Elsa Garcia (consultant) at (916) 654-2110. You may also contact your consultant by e-mail at elsa.garcia@dss.ca.gov.

Sincerely,

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

c: Robert Thomas, Civil Rights Coordinator

Linda Patterson, Branch Chief
CDSS CalFresh Program

Mike Papin, Chief
CalFresh Policy Bureau

Marlene Fleming, Chief
Field Operations Bureau

Brian Tam, Chief
CalFresh Management Operations Section

Paul Gardes
CalFresh Policy Bureau

Thuan Nguyen
Refugee Programs Bureau

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

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

Jodie Berger, Regional Counsel
Legal Services of Northern California

City and County of San Francisco



Edwin M. Lee, Mayor

Human Services Agency

Department of Human Services
Department of Aging and Adult Services

Trent Rhorer, Executive Director

VIA EMAIL

May 14, 2012

Jim Tashima
Chief, Civil Rights Bureau
Human Rights and Community Services Division
California Department of Social Services
744 P Street
Sacramento, California 95814

RE: City and County of San Francisco, Human Services Division
Response to Civil Rights Compliance Review Report (March 14-18, 2011)

Dear Mr. Tashima:

Attached please find our corrective action plan (CAP), which addresses each deficiency and outlines our steps and timelines for corrective actions as outlined in the March 2011 survey.

Thank you for the detailed review and subsequent feedback that was provided to our Agency. We have especially appreciated working with Elsa Garcia. She has been very responsive and helpful during the past year in answering our questions.

Should you have any questions, you may contact me at (415) 557-5649.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Thomas".

Robert Thomas
Human Resources Director
Civil Rights Officer

Attachments: Civil Rights Compliance Review Report, March 14-18, 2011
Corrective Action Plan

cc: Trent Rhorer, Executive Director, Human Services Agency
Elsa Garcia, Department of Social Services, Civil Rights Bureau
Phil Arnold, Deputy Director, Human Services Agency
Luenna Kim, Employee/Labor Relations Manager, Human Services Agency
Livelihood

City and County of San Francisco
HUMAN SERVICES AGENCY

Corrective Action Plan
March 14-18, 2011, Survey

I. Abbreviations

California Department of Social Services (CDSS)
Civil Rights Bureau (CRB)
Corrective Action Plan (CAP)

City and County of San Francisco (CCSF)
City and County of San Francisco, Human Services Agency (HSA)
Human Services Agency, Office of Civil Rights (OCR)
Human Services Agency, Support Services Division (SSD)

II. Corrective Action Plan

III. Dissemination of Information

Informational Element	Corrective Action	OCR Response
Auxiliary Aids	HSA shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility.	SSD has the large print and auditory aids. Braille has been placed on order. SSD will distribute them to the appropriate locations as soon as Braille orders are received. Completion Status: Ordered May 3, 2012

Informational Element	Corrective Action	OCR Response
Distribution of CDSS' Pub 13	San Francisco City and County shall ensure that the Pub 13 pamphlet, "Your Rights Under California Welfare Programs," is both given and explained to program participants in all of the programs for which CDSS has oversight responsibility.	<p>SSD ordered new racks for Pub 13 and will be distributed to the appropriate locations.</p> <p>Target completion: May 18, 2012</p> <p>SSD printed copies of all the current version of Pub 13 in all languages that are translated by CDSS.</p> <p>OCR met with the programs to confirm that HSA clients have been given the current Pub 13 version in their primary language at the initial intake interview.</p> <p>Completed: May 2, 2012</p>
Posters	HSA shall ensure that the most current version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms.	<p>SSD ordered the posters, distributed and posted then in the appropriate locations.</p> <p>Completed: May 1, 2012</p>

IV. Facility Accessibility for Individuals with Disabilities

Facility Location: 1235 Mission Street, San Francisco

Facility Element	Corrective Action	OCR Response
Distribution Site Lobby	The house phones – no reduction in the required clear width or path or maneuvering space	<p>SSD engineer removed rows of chairs to provide required space.</p> <p>Completed: May 2, 2012</p>
Distribution Site Lobby	Force to open doors, exterior and interior is 5 pounds maximum.	<p>SSD engineer checked and adjusted the door pressure. Engineers will check door pressure on a routine basis.</p> <p>Completed: May 4, 2012</p>

Facility Element	Corrective Action	OCR Response
<p>Men's Restroom in Client's Lobby</p>	<p>Hot water and drainpipes are insulated or covered. No sharp or abrasive surfaces under lavatories.</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40"</p> <p>Locking/Latching Doors: If hand-operated, to be operable with a single effort (e.g.; lever, panic bar, push/pull)</p>	<p>Kits to wrap pipes were ordered and will be installed as soon as they are received.</p> <p>Target Completion: May 18, 2012</p> <p>SSD engineer moved the dispensing and disposable fixtures to an acceptable height.</p> <p>Target Completion: May 11, 2012</p> <p>SSD engineer repaired broken latch.</p> <p>Completed: May 4, 2012</p>
<p>Women's Restroom in Client's Lobby</p>	<p>Door closer (if present) must be set so it takes at least 3 seconds to close from an open position of 70 degrees to a point 3" from the latch.</p> <p>Hot water and drainpipes are insulated or covered. No sharp or abrasive surfaces under lavatories</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40"</p>	<p>SSD engineer checked and adjusted the door pressure. Engineer will check door pressure on a routine basis.</p> <p>Completed: May 4, 2012</p> <p>Kits to wrap pipes were ordered and will be installed as soon as they are received.</p> <p>Target Completion: May 18, 2012</p> <p>SSD engineer moved the dispensing and disposable fixtures to an acceptable height.</p> <p>Target Completion: May 11, 2012</p>

Facility Location: 3801 Third Street, San Francisco

NOTE: *HSA leases office space in a small office/retail mall. All the findings from the civil rights audit to this location have to do with public areas, which are under the purview of the owner/building management. A letter from the SSD manager has been sent to inform the owner/building manager of the issue that needs to be addressed and corrected.*

Facility Element	Corrective Action	OCR Response
<p>Parking</p>	<p>Each parking space for persons with disabilities shall be identified by a reflectorized sign permanently posted adjacent to and visible from each stall or space, consisting of the International Symbol of accessibility in white on dark blue background.</p> <p>Freestanding sign height (80"), proper signage. Wall-mounted sign height (36" minimum)</p> <p>The sign shall be 70 sq. in. min. and when in a path of travel, shall be posted at a height of 80" min. from the bottom of the sign finished grade.</p> <p>Slope of ramp does not exceed 1:12 (8.3% slope)</p>	<p>See note above</p> <p>Target Completion: December 30, 2012 (For all the corrective actions in the facility of 3801 Third Street)</p>
<p>Main Entrance</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum.</p>	<p>See note above</p>
<p>Lower Level Men's Restroom</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum.</p>	<p>See note above</p>

Facility Element	Corrective Action	OCR Response
<p>Lower Level Women's Restroom</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum.</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum heights of 40"</p>	<p>See note above</p> <p>See note above</p>
<p>Second Level Men's Restroom</p>	<p>Door sign and wall sign shall be 60" above the floor to the centerline of sign.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferable on the right.</p> <p>Raised characters shall be raise 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille.</p>	<p>See note above</p>
<p>Second Level Women's Restroom</p>	<p>Door sign and wall sign shall be 60" above the floor to the centerline of sign.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right.</p>	<p>See note above</p>

Facility Element	Corrective Action	OCR Response
Second Level Women's Restroom (continuation)	<p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille.</p> <p>Hot water and drainpipes are insulated or covered. No sharp or abrasive surfaces under lavatories.</p>	See note above

Facility Location: 170 Otis Street, San Francisco

Facility Element	Corrective Action	OCR Response
Men's Restroom	Hot water and drainpipes are insulated or covered. No sharp or abrasive surfaces under lavatories.	<p>SSD engineer has securely wrapped and covered the drainpipes.</p> <p>Completed: April 27, 2012</p>

V. Provision for Services to Applicants and Recipients who are No-English-Speaking or who have Disabilities

No Corrective Action noted

VI. Documentation of Applicant/Recipient Case Records

Element	Corrective Action	OCR Response
Documentation that bilingual services were provided.	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter.	Programs have already implemented the procedure, and information has been documented in the cases comments regarding the services that were provided. Comments also include the appropriate language that was provided and who provided the interpretive services.
General	HSA must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance.	Implementation effective date: April 2, 2012

VII. Staff Development and Training

No corrective action noted

VIII. Discrimination Complaint Procedures

Element	Corrective Action	OCR Response
Discrimination Process	HSA shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complain processes	Discrimination complaint processes are included in the New Employee Orientation training.
Civil Rights Coordinator	HSA shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located.	OCR will again email all HSA staff regarding the contact information of the civil rights coordinator. Information is included in the New Employee Orientation training handout. Target Completion Date: June 1, 2012