



CDSS

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DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**

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EDMUND G. BROWN JR.  
GOVERNOR

October 1, 2018

Grant Nash Colfax, MD, Director  
Marin County Department of Health  
& Human Services  
20 North San Pedro Rd. Ste 2002  
San Rafael, CA 94903

Dear Mr. Colfax:

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 May 21, 2018 through May 25, 2018. 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 the Americans with Disabilities Act website accessibility, we also require the CAP to be submitted electronically as a Word document via [crb@dss.ca.gov](mailto: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 at <http://www.cdss.ca.gov/inforesources/Civil-Rights/Compliance-Reports-and-Corrective-Action-Plans>

If you need technical assistance in the development of your CAP, please feel free to contact James Urquizo at (916) 607-5916. You may also contact us at [crb@dss.ca.gov](mailto:crb@dss.ca.gov).

Sincerely,

*Original signed by Christina Teixeira*

CHRISTINA TEIXEIRA, Manager  
Civil Rights Unit  
Housing, Homelessness, and Civil Rights Branch  
Enclosure

c: John Bhambra, Civil Rights Coordinator

Kim McCoy Wade, Chief  
CalFresh Branch

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CalFresh Operations Bureau

Alexis Fernandez, Chief  
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Maribelle Balbes, Chief  
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Supplemental Nutrition Assistance Program (SNAP)  
Western Region

Kevin Aslanian  
Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier  
Western Center on Law and Poverty

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR  
Marin County Department of Health & Human Services  
Conducted on  
May 21, 2018 through May 25, 2018**

**California Department of Social Services  
Housing, Homelessness, and Civil Rights Branch  
Civil Rights Unit  
744 P Street, M.S. 8-16-70  
Sacramento, CA 95814  
(916) 654-2107**

**Reviewer: Jaime Urquizo**

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## I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Unit (CRU) staff was to assess the Marin County Department of Health & Human Services 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 May 21, 2018 through May 25, 2018. An exit interview was held on May 25, 2018, 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)
Social Services Multi-Service Center	120 North Redwood Drive – San Rafael, CA	Calworks, Welfare to Work, Calfresh	Spanish
Children and Family Services	3240 / 3250 Kerner – San Rafael, CA	Calworks, Children Family Services, Calfresh	Spanish
Children and Family Services	6 <sup>th</sup> Street - Point Reyes, CA	Children Family Services	Spanish
Public Assistance	75 Rowland Avenue – Novato, CA	Calworks, Calfresh	Spanish

## II. SUMMARY OF METHODOLOGY

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

- Reviewed the **2018-2019** 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.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of civil rights coordinator
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussion with community advocate groups. In this review the following organization(s) were contacted for feedback.

Child Parent Institute  
7345 Burton Avenue  
Rohnert Park, CA  
Telephone: (707) 585-6108  
Fax: (707) 585-6155

Marin JCC Camp  
200 N. San Pedro Road  
San Rafael, CA  
(415) 444-8055

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

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Program Accessibility for Clients with Disabilities (physical, mental, learning, visual or hearing impairment, etc.)
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

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

#### **Interviews Conducted of Public Contact Staff**

<b>Classifications</b>	<b>Total</b>	<b>Bilingual</b>
Eligibility Workers	21	10
Children Social Workers	11	6
Receptionist/Screeners	8	6
<b>Total</b>	<b>40</b>	<b>26</b>

## **Civil Rights Coordinator and Program Manager Surveys**

Number of surveys distributed: (5)

Number of surveys received: (5)

## **Reviewed Case Files**

English speakers' case files reviewed: (24)

Non-English or limited-English speakers' case files reviewed: (106)

Languages of clients' cases: (English / Spanish)

Reasonable Accommodation cases reviewed: (3)

Sections III through IX 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 X evaluates the County's Call/Service Centers services provided to non-English speaking clients and clients with a disability.

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

Section XIII 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**

<b>Question (Please answer yes/no and provide response with comments.)</b>	<b>Comments</b>
Does the County accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	Yes, clients are able to mail in documents necessary to complete their service application(s).
Can clients, including those with disabilities, access services when they are unable to go to the office?	Yes, online services are available for clients.
Does the County ensure the awareness of available services individuals in remote areas?	Yes, the County has informational outreach programs to reach clients in remote areas.

**b. Findings: Signage, Posters and Pamphlets**

<b>Question (Please answer yes/no and provide response with comments.)</b>	<b>Comments</b>
Does the County use the CDSS pamphlet "Your Rights under California Welfare Programs" (Publication 13 – August 2016)?	Yes, Publication 13 is available to all clients.
Is the pamphlet distributed and explained to each client at intake and re-certification?	Yes, at intake all clients are briefed using the Publication 13 and handed the brochure.
Is the current version of Publication 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukrainian, and Vietnamese?	Yes, receptionists are aware of where to obtain Publication 13 in other languages at the CDSS website.
Were the current versions of the required posters present in the lobbies?	Yes, current versions of the required posters were available and visibly posted (i.e. And Justice for All (AD-475B), Everyone is Different, but Equal under the Law (PUB 86 Revised 03/07) with current CRC contact information.

Question (Please answer yes/no and provide response with comments.)	Comments
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?	Yes, instructional and directional signs are well posted in lobby areas for clients to utilize.

c. **Corrective Action:** None.

d. **Recommendation:** None.

#### 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: (120 North Redwood Drive, San Rafael, CA)**

Facility Element/Finding	Corrective Action
<p><b>Disabled Parking:</b></p> <p>Two signs at entry of parking lot missing tow company and telephone numbers</p>	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space.</p> <p><b>(CA T24 11B-502.8) California Accessibility Reference Manual (CARM) page 159</b></p> <p>The additional sign shall not be less than 17 inches wide by 22 inches high.</p> <p><b>(CA T24 11B-502.8.1 Figure 4) CARM page 159</b></p> <p>The additional sign shall clearly state in letters with a minimum height of 1 inch the following: Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____.</p> <p><b>(CA T24 11B-502.8.2) CARM page 159</b></p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign.</p> <p><b>(CA T24 11B-502.8.2) CARM page 159</b></p>
<p><b>Disabled Parking:</b></p> <p>Two directional signs needed coming up the driveway.</p>	<p>Directional signs complying with "Visual Characters" heading in Section 57, Signs &amp; Identification, including the International Symbol of Accessibility complying with "International Symbol of Accessibility" heading in Section 57, Signs &amp; Identification, indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path.</p>

Facility Element/Finding	Corrective Action
<p><i>Continued from previous page</i></p>	<p><i>Continued from previous page</i></p> <p><b>(CA T24 11B-216.6) page 28</b></p> <p>Visual characters shall be <b>40 inches</b> minimum above the finish floor or ground.</p> <p><b>(CA T24 11B-703.5.6) (ADA 703.5.6) page 376</b></p>
<p><b>Disabled Parking:</b></p> <p>Bus stop sign next to building has a disabled sign with incorrect wording.</p>	<p>Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign.</p> <p><b>(CA T24 11B-502.6) (ADA 502.6) CARM page 158</b></p> <p>Exceptions: Signs located within an accessible route shall be a minimum of 80 inches above the finish floor or ground surface measured to the bottom of the sign.</p> <p><b>(CA T24 11B-502.6) CARM page 158</b></p> <p>Additional language or an additional sign below the International Symbol of Accessibility shall state Minimum Fine \$250.</p> <p><b>(CA T24 11B-502.6.2) CARM page 158</b></p>
<p><b>Disabled Parking:</b></p> <p>Bus stop sign next to building does not have correct painted disabled parking lines.</p>	<p>Parking space minimum dimensions: 9 feet wide by 18 feet long.</p> <p><b>(CA T24 11B-502.2 Figure 9) (ADA 502.2) CARM page 166</b></p> <p>Access aisle minimum dimensions: 5 feet wide by 18 feet long.</p> <p><b>(CA T24 11B-502.3.1 Figure 9) (ADA 502.3) CARM page 166</b></p> <p>Access aisles shall adjoin an accessible route.</p> <p><b>(CA T24 11B-502.3) (ADA 502.3) CARM page 166</b></p>

Facility Element/Finding	Corrective Action
<p><i>Continued from previous page</i></p>	<p><i>Continued from previous page</i></p> <p>Two parking spaces shall be permitted to share a common access aisle.</p> <p><b>(CA T24 11B-502.3) (ADA 502.3) CARM page 166-167</b></p> <p>Access aisles serving car and van parking spaces shall be 5 feet wide minimum.</p> <p><b>(CA T24 11B-502.3.1) (ADA 502.3.1) CARM page 173</b></p> <p>Access aisles shall extend the full required length of the parking spaces they serve.</p> <p><b>(CA T24 11B-502.3.2) (ADA 502.3.2) CARM page 167</b></p>
<p><b>Disabled Parking:</b></p> <p>Crosswalk from street not painted correctly with disabled crosswalk lines.</p>	<p>Access aisles shall adjoin an accessible route.</p> <p><b>(CA T24 11B-502.3) (ADA 502.3) CARM page 164</b></p>
<p><b>Elevator:</b></p> <p>Elevator is not correctly marked with raised lettering braille sticker.</p>	<p>A visible and audible signal shall be provided at each hoist way entrance to indicate which car is answering a call and the car's direction of travel.</p> <p><b>(CA T24 11B-407.2.2.1) (ADA 407.2.2.1) CARM page 242</b></p> <p>Visible signal fixtures shall be centered at 72 inches minimum above the finish floor or ground.</p> <p><b>(CA T24 11B-407.2.2.2) (ADA 407.2.2.2) CARM page 242</b></p> <p>Audible signals shall sound once for the up direction and twice for the down direction or shall have verbal annunciators that indicate the direction of elevator car travel.</p>

Facility Element/Finding	Corrective Action
	<p><b>(CA T24 11B-407.2.2.3) (ADA 407.2.2.3) CARM page 242</b></p> <p>The call button that designates the up direction shall be located above the call button that designates the down direction.</p> <p><b>(CA T24 11B-407.2.1.4) (ADA 407.2.1.4) CARM page 241</b></p> <p>Where a forward reach is unobstructed, the high forward reach shall be 48 inches maximum and the low forward reach shall be 15 inches minimum above the finish floor or ground.</p> <p><b>(CA T24 11B-308.2.1) (ADA 308.2.1) CARM page 309</b></p>
<p><b>Men's Restroom:</b></p> <p>Men's Restroom does not have disabled door signs</p>	<p>Men's toilet and bathing facilities shall be identified by an equilateral triangle, ¼ inches thick with edges 12 inches long and a vertex pointing upward.</p> <p><b>(CA T24 11B-703.7.2.6.1) CARM page 376</b></p> <p>The triangle symbol shall contrast with the door, either light on a dark background or dark on a light background.</p> <p><b>(CA T24 11B-703.7.2.6.1) CARM page 376</b></p> <p>The symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol.</p> <p><b>(CA T24 11B-703.7.2.6) CARM page 376</b></p> <p>Where a door is provided the symbol shall be mounted within 1 inches of the vertical centerline of the door.</p> <p><b>(CA T24 11B-703.7.2.6) CARM page 376</b></p>

Facility Element/Finding	Corrective Action
<i>Continued from previous page</i>	<p><i>Continued from previous page</i></p> <p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</b></p>
<p><b>Women's Restroom:</b></p> <p>Women's Restroom does not have disabled door signs</p>	<p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 447</b></p> <p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 447</b></p>
<p><b>Men's Restroom:</b></p> <p>Men's Restroom does not have the correct disabled wall signs. Raised braille lettering needed.</p>	<p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</b></p> <p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</b></p>
<p><b>Women's Restroom:</b></p> <p>Women's Restroom does not have the correct disabled wall signs. Raised braille lettering needed.</p>	<p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</b></p> <p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</b></p>

Facility Element/Finding	Corrective Action
<p><b>Client Interview Rooms and Booths:</b></p> <p>Second floor Career Resource Room – no disabled sign at front entrance wall and no sign at room table designation.</p>	<p>Installation height above finished floor shall be 40 inches maximum.</p> <p><b>(CA T24 11B-703.5 Table 57-5) (ADA 703.5) CARM page 455</b></p>
<p><b>Client Interview Rooms and Booths:</b></p> <p>Second floor Office number one – no disabled sign at front entrance wall and no sign at room table designation.</p>	<p>Installation height above finished floor shall be 40 inches maximum.</p> <p><b>(CA T24 11B-703.5 Table 57-5) (ADA 703.5) CARM page 455</b></p>
<p><b>Client Interview Rooms and Booths:</b></p> <p>Third floor- fifteen Employment Training rooms not complaint.</p>	<p>Installation height above finished floor shall be 40 inches maximum.</p> <p><b>(CA T24 11B-703.5 Table 57-5) (ADA 703.5) CARM page 455</b></p> <p>Where the accessible route makes a 180 degree turn around an element which is less than 48 inches wide, clear width shall be 42 inches minimum approaching the turn, 48 inches minimum at the turn and 42 inches minimum leaving the turn.</p> <p><b>(CA T24 11B-403.5.2) (ADA 403.5.2) CARM page 212</b></p> <p>The turning space shall be a space of 60 inches diameter minimum.</p> <p><b>(CA T24 11B-304.3.1) (ADA 304.3.1) CARM page 306</b></p> <p>The turning space shall be a T-shaped space within a 60 inches by 60 inches minimum square with arms and base 36 inches wide minimum.</p> <p><b>(CA T24 11B-304.3.2) CARM page 306</b></p>

Facility Element/Finding	Corrective Action
<p><i>Continued from previous page</i></p>	<p><i>Continued from previous page</i></p> <p>Where knee clearance is required under an element as part of a clear floor space, the knee clearance shall be 11 inches minimum deep at 9 inches above the finish floor or ground and 8 inches minimum deep at 27 inches above the finish floor or ground.</p> <p><b>(CA T24 11B-306.3.3) (ADA 306.3.3) CARM page 305</b></p> <p>Knee clearance shall be 30 inches minimum wide.</p> <p><b>(CA T24 11B-306.3.5) (ADA 306.3.5) CARM page 305</b></p>
<p><b>Client Interview Rooms and Booths:</b></p> <p>Sycamore Room – no disabled sign at front entrance wall and no sign at room table designation.</p>	<p>Installation height above finished floor shall be 40 inches maximum.</p> <p><b>(CA T24 11B-703.5 Table 57-5) (ADA 703.5) CARM page 455</b></p>
<p><b>Client Interview Rooms and Booths:</b></p> <p>Madrone Room – no disabled sign at front entrance wall and no sign at room table designation.</p>	<p>Installation height above finished floor shall be 40 inches maximum.</p> <p><b>(CA T24 11B-703.5 Table 57-5) (ADA 703.5) CARM page 455</b></p>
<p><b>Client Interview Rooms and Booths:</b></p> <p>West End (Intake) – ten Interview rooms with no disabled sign at front entrance wall, no sign at room table designation, no 5 feet turnabout, and table short in depth.</p>	<p>Installation height above finished floor shall be 40 inches maximum.</p> <p><b>(CA T24 11B-703.5 Table 57-5) (ADA 703.5) CARM page 455</b></p>

Facility Element/Finding	Corrective Action
<p><b>Women's Restroom:</b></p> <p>West End Women's Restroom (outside) door sign does not have raised braille lettering and wheelchair image is missing.</p>	<p>The circle symbol shall contrast with the door, either light on a dark background or dark on a light background.</p> <p><b>(CA T24 11B-703.7.2.6.2) CARM page 376</b></p> <p>The symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol.</p> <p><b>(CA T24 11B-703.7.2.6) CARM page 376</b></p> <p>Where a door is provided the symbol shall be mounted within 1 inches of the vertical centerline of the door.</p> <p><b>(CA T24 11B-703.7.2.6) CARM page 376</b></p> <p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 447</b></p>
<p><b>Men's Restroom:</b></p> <p>West End Men's Restroom (outside) door sign does not have raised braille lettering and wheelchair image is missing.</p>	<p>Men's toilet and bathing facilities shall be identified by an equilateral triangle, ¼ inches thick with edges 12 inches long and a vertex pointing upward.</p> <p><b>(CA T24 11B-703.7.2.6.1) CARM page 376</b></p> <p>The triangle symbol shall contrast with the door, either light on a dark background or dark on a light background.</p> <p><b>(CA T24 11B-703.7.2.6.1) CARM page 376</b></p> <p>The symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol.</p> <p><b>(CA T24 11B-703.7.2.6) CARM page 376</b></p>

Facility Element/Finding	Corrective Action
<i>Continued from previous page</i>	<p><i>Continued from previous page</i></p> <p>Where a door is provided the symbol shall be mounted within 1 inches of the vertical centerline of the door.</p> <p><b>(CA T24 11B-703.7.2.6) CARM page 376</b></p> <p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</b></p>

- a. **Corrective Action:** Refer to Corrective Action column above (Section A, 1).
- b. **Recommendation:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 1).

**2. Facility Location: (3250 / 3240 Kerner Blvd, San Rafael, CA)**

Facility Element/Finding	Corrective Action
<p><b>Main Entry to Parking:</b></p> <p>Disabled parking sign at entry to parking lot missing tow company and correct language.</p>	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space.</p> <p><b>(CA T24 11B-502.8) CARM page 159</b></p> <p>The additional sign shall not be less than 17 inches wide by 22 inches high.</p> <p><b>(CA T24 11B-502.8.1 Figure 4) CARM page 159</b></p> <p>The additional sign shall clearly state in letters with a minimum height of 1 inch the following: Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____.</p>

Facility Element/Finding	Corrective Action
<i>Continued from previous page</i>	<p><i>Continued from previous page</i></p> <p><b>(CA T24 11B-502.8.2) CARM page 159</b></p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign.</p> <p><b>(CA T24 11B-502.8.2) CARM page 159</b></p>
<p><b>Main Entry to Parking:</b></p> <p>Two Parking Directional Signs needed next to driveway coming up the main driveway, leading disabled clients to the designated disabled parking spots and to the front main entrance to the building.</p>	<p>Directional signs complying with Visual Characters heading in Section 63 (11B-703.5)(Signs &amp; Identification), including the International Symbol of Accessibility complying with "International Symbol of Accessibility" heading in Section 63 (11B-703.7.2.1)(Signs &amp; Identification), indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path.</p> <p><b>(CA T24 11B-216.6) CARM page 35</b></p>

### BUILDING 3250

Facility Element/Finding	Corrective Action
<p><b>Disabled Parking:</b></p> <p>Two disabled parking spots in front of the building are not ADA compliant. Language on sign incorrect.</p>	<p>Parking identification signs shall be reflectorized with a minimum area of 70 square inches.</p> <p><b>(CA T24 11B-502.6.1) CARM page 158</b></p> <p>Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign.</p> <p><b>(CA T24 11B-502.6) (ADA 502.6) CARM page 158</b></p> <p>Exceptions: Signs located within an accessible route shall be a minimum of 80 inches above the finish floor or ground surface measured to the bottom of the sign.</p> <p><b>(CA T24 11B-502.6) CARM page 158</b></p>

Facility Element/Finding	Corrective Action
	<p>Additional language or an additional sign below the International Symbol of Accessibility shall state Minimum Fine \$250.</p> <p><b>(CA T24 11B-502.6.2) CARM page 158</b></p>
<p><b>Disabled Parking:</b></p> <p>All disabled parking lines need to be repainted.</p>	<p>The parking space shall be marked with the International Symbol of Accessibility in white on a blue background - a minimum 36 inches wide by 36 inches high.</p> <p><b>(CA T24 11B-502.6.4.1) CARM page 159</b></p> <p>OR</p> <p>In white or a suitable contrasting color.</p> <p><b>(CA T24 11B-502.6.4.2) CARM page 159</b></p> <p>The centerline of the International Symbol of Accessibility shall be a maximum of 6 inches from the centerline of the parking space, its sides parallel to the length of the parking space and its lower corner at, or lower side aligned with, the end of the parking space length.</p> <p><b>(CA T24 11B-502.6.4.2) CARM page 159</b></p> <p>The words NO PARKING shall be painted on the surface of each access aisle.</p> <p><b>(CA T24 11B-502.3.3) CARM page 166</b></p> <p>This notice shall be painted in white letters a minimum of 12 inches in height and located to be visible from the adjacent vehicular way.</p> <p><b>(CA 11B-502.3.3) CARM page 166</b></p> <p>Access aisles shall be marked with a blue painted borderline around their perimeter.</p>

Facility Element/Finding	Corrective Action
<p><i>Continued from previous page</i></p>	<p><i>Continued from previous page</i></p> <p><b>(CA T24 11B-502.3.3) (ADA 502.3.3) CARM page 164</b></p> <p>The area within the blue borderlines shall be marked with hatched lines a maximum of 36 inches on center in a color contrasting with that of the aisle surface, preferably blue or white.</p> <p><b>(CA T24 11B-502.3.3) CARM page 164</b></p>
<p><b>Disabled Parking Signage:</b></p> <p>Directional signs need to be posted to guide disabled clients safely to the front entrance from the disabled parking spots.</p>	<p>In existing buildings and facilities where not all entrances comply with Section 28 (11B-404)(Doors, Doorways and Gates), entrances complying with Section 28 (Doors, Doorways and Gates) shall be identified by the International Symbol of Accessibility complying with “International Symbol of Accessibility” heading in Section 63 (11B-703.7.2.1)(Signs &amp; Identification).</p> <p><b>(CA T24 11B-216.6) (ADA 216.6) CARM page 35</b></p> <p>Directional signs complying with Visual Characters heading in Section 63 (11B-703.5)(Signs and Identification), including the International Symbol of Accessibility complying with “International Symbol of Accessibility” heading in Section 63 (11B-703.7.2.1)</p> <p>(Signs and Identification), indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path.</p> <p><b>(CA T24 11B-216.6) CARM page 35</b></p> <p>Visual characters shall be 40 inches minimum above the finish floor or ground.</p> <p><b>(CA T24 11B-703.5.6) (ADA 703.5.6) CARM page 449</b></p>

Facility Element/Finding	Corrective Action
<p><b>Women's Restroom:</b></p> <p>Women's restroom door ADA sign is not compliant with the correct symbols.</p>	<p>Women's toilet and bathing facilities shall be identified by a circle, ¼ inches thick and 12 inches in diameter.</p> <p><b>(CA T24 11B-703.7.2.6.2) CARM page 376</b></p> <p>The circle symbol shall contrast with the door, either light on a dark background or dark on a light background.</p> <p><b>(CA T24 11B-703.7.2.6.2) CARM page 376</b></p> <p>The symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol.</p> <p><b>(CA T24 11B-703.7.2.6) CARM page 376</b></p> <p>Where a door is provided the symbol shall be mounted within 1 inches of the vertical centerline of the door.</p> <p><b>(CA T24 11B-703.7.2.6) CARM page 376</b></p> <p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 447</b></p>
<p><b>Women's Restroom:</b></p> <p>Women's restroom wall ADA sign is not compliant with the correct symbols.</p>	<p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 447</b></p>
<p><b>Men's Restroom:</b></p> <p>Men's restroom door ADA sign is not compliant with the correct symbols.</p>	<p>Men's toilet and bathing facilities shall be identified by an equilateral triangle, ¼ inches thick with edges 12 inches long and a vertex pointing upward.</p> <p><b>(CA T24 11B-703.7.2.6.1) CARM page 376</b></p>

Facility Element/Finding	Corrective Action
<p><i>Continued from previous page</i></p>	<p><i>Continued from previous page</i></p> <p>The triangle symbol shall contrast with the door, either light on a dark background or dark on a light background.</p> <p><b>(CA T24 11B-703.7.2.6.1) CARM page 376</b></p> <p>The symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol.</p> <p><b>(CA T24 11B-703.7.2.6) CARM page 376</b></p> <p>Where a door is provided the symbol shall be mounted within 1 inches of the vertical centerline of the door.</p> <p><b>(CA T24 11B-703.7.2.6) CARM page 376</b></p> <p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</b></p>
<p><b>Men's Restroom:</b></p> <p>Men's restroom wall ADA sign is not compliant with the correct symbols.</p>	<p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</b></p>
<p><b>Interview Room:</b></p> <p>G Room is not ADA compliant with correct ADA signage, turnaround is not five feet and table depth is short of 40 inches.</p>	<p>Installation height above finished floor shall be 40 inches maximum.</p> <p><b>(CA T24 11B-703.5 Table 57-5) (ADA 703.5) CARM page 455</b></p> <p>Where the accessible route makes a 180 degree turn around an element which is less than 48 inches wide, clear width shall be 42 inches minimum approaching the turn, 48 inches minimum at the turn and 42 inches minimum leaving the turn.</p> <p><b>(CA T24 11B-403.5.2) (ADA 403.5.2) CARM page 212</b></p>

Facility Element/Finding	Corrective Action
<p><i>Continued from previous page</i></p>	<p><i>Continued from previous page</i></p> <p>The turning space shall be a space of 60 inches diameter minimum.</p> <p><b>(CA T24 11B-304.3.1) (ADA 304.3.1) CARM page 306</b></p> <p>The turning space shall be a T-shaped space within a 60 inches by 60 inches minimum square with arms and base 36 inches wide minimum.</p> <p><b>(CA T24 11B-304.3.2) CARM page 306</b></p> <p>Where knee clearance is required under an element as part of a clear floor space, the knee clearance shall be 11 inches minimum deep at 9 inches above the finish floor or ground and 8 inches minimum deep at 27 inches above the finish floor or ground.</p> <p><b>(CA T24 11B-306.3.3) (ADA 306.3.3) CARM page 305</b></p> <p>Knee clearance shall be 30 inches minimum wide.</p> <p><b>(CA T24 11B-306.3.5) (ADA 306.3.5) CARM page 305</b></p>

## BUILDING 3240

Facility Element/Finding	Corrective Action
<p><b>Disabled Parking:</b></p> <p>Two disabled parking spots in the back of the building are not ADA compliant. Language on sign incorrect.</p>	<p>Parking identification signs shall be reflectorized with a minimum area of 70 square inches.</p> <p><b>(CA T24 11B-502.6.1) CARM page 158</b></p> <p>Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign.</p> <p><b>(CA T24 11B-502.6) (ADA 502.6) CARM page 158</b></p> <p>Exceptions: Signs located within an accessible route shall be a minimum of 80 inches above the finish floor or ground surface measured to the bottom of the sign.</p>

Facility Element/Finding	Corrective Action
<p><i>Continued from previous page</i></p>	<p><i>Continued from previous page</i></p> <p><b>(CA T24 11B-502.6) CARM page 158</b></p> <p>Additional language or an additional sign below the International Symbol of Accessibility shall state Minimum Fine \$250.</p> <p><b>(CA T24 11B-502.6.2) CARM page 158</b></p>
<p><b>Women's Restroom:</b></p> <p>Women's restroom door ADA sign is not compliant with the correct symbols.</p>	<p>Women's toilet and bathing facilities shall be identified by a circle, 1/4 inches thick and 12 inches in diameter.</p> <p><b>(CA T24 11B-703.7.2.6.2) CARM page 376</b></p> <p>The circle symbol shall contrast with the door, either light on a dark background or dark on a light background.</p> <p><b>(CA T24 11B-703.7.2.6.2) CARM page 376</b></p> <p>The symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol.</p> <p><b>(CA T24 11B-703.7.2.6) CARM page 376</b></p> <p>Where a door is provided the symbol shall be mounted within 1 inches of the vertical centerline of the door.</p> <p><b>(CA T24 11B-703.7.2.6) CARM page 376</b></p>
<p><b>Women's Restroom:</b></p> <p>Women's restroom wall ADA sign is not compliant with the correct symbols.</p>	<p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 447</b></p> <p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 447</b></p>

Facility Element/Finding	Corrective Action
<p><b>Men's Restroom:</b></p> <p>Men's restroom door ADA sign is not compliant with the correct symbols.</p>	<p>Men's toilet and bathing facilities shall be identified by an equilateral triangle, ¼ inches thick with edges 12 inches long and a vertex pointing upward.</p> <p><b>(CA T24 11B-703.7.2.6.1) CARM page 376</b></p> <p>The triangle symbol shall contrast with the door, either light on a dark background or dark on a light background.</p> <p><b>(CA T24 11B-703.7.2.6.1) CARM page 376</b></p> <p>The symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol.</p> <p><b>(CA T24 11B-703.7.2.6) CARM page 376</b></p> <p>Where a door is provided the symbol shall be mounted within 1 inches of the vertical centerline of the door.</p> <p><b>(CA T24 11B-703.7.2.6) CARM page 376</b></p>
<p><b>Men's Restroom:</b></p> <p>Men's restroom wall ADA sign is not compliant with the correct symbols.</p>	<p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</b></p> <p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</b></p>
<p><b>Interview Room:</b></p> <p>Interview Room 40113 is not ADA compliant to accept clients with a turnabout of five feet. Table depth is short also.</p>	<p>Where the accessible route makes a 180 degree turn around an element which is less than 48 inches wide, clear width shall be 42 inches minimum approaching the turn, 48 inches minimum at the turn and 42 inches minimum leaving the turn.</p> <p><b>(CA T24 11B-403.5.2) (ADA 403.5.2) CARM page 212</b></p> <p>The turning space shall be a space of 60 inches diameter minimum.</p>

Facility Element/Finding	Corrective Action
<p><i>Continued from previous page</i></p>	<p><i>Continued from previous page</i></p> <p><b>(CA T24 11B-304.3.1) (ADA 304.3.1) CARM page 306</b></p> <p>The turning space shall be a T-shaped space within a 60 inches by 60 inches minimum square with arms and base 36 inches wide minimum.</p> <p><b>(CA T24 11B-304.3.2) CARM page 306</b></p>
<p><b>Interview Room:</b></p> <p>Interview Room 40115 is not ADA compliant to accept clients with a turnabout of five feet. Table depth is short also.</p>	<p>Where the accessible route makes a 180° turn around an element which is less than 48 inches wide, clear width shall be 42 inches minimum approaching the turn, 48 inches minimum at the turn and 42 inches minimum leaving the turn.</p> <p><b>(CA T24 11B-403.5.2) (ADA 403.5.2) CARM page 212</b></p> <p>The turning space shall be a space of 60 inches diameter minimum.</p> <p><b>(CA T24 11B-304.3.1) (ADA 304.3.1) CARM page 306</b></p> <p>The turning space shall be a T-shaped space within a 60 inches by 60 inches minimum square with arms and base 36 inches wide minimum.</p> <p><b>(CA T24 11B-304.3.2) CARM page 306</b></p>
<p><b>Interview Room:</b></p> <p>Interview Room 40116 is not ADA compliant to accept clients with a turnabout of five feet. Table depth is short.</p>	<p>Where the accessible route makes a 180 degree turn around an element which is less than 48 inches wide, clear width shall be 42 inches minimum approaching the turn, 48 inches minimum at the turn and 42 inches minimum leaving the turn.</p> <p><b>(CA T24 11B-403.5.2) (ADA 403.5.2) CARM page 212</b></p> <p>The turning space shall be a space of 60 inches diameter minimum.</p> <p><b>(CA T24 11B-304.3.1) (ADA 304.3.1) CARM page 306</b></p>

Facility Element/Finding	Corrective Action
<i>Continued from previous page</i>	<p><i>Continued from previous page</i></p> <p>The turning space shall be a T-shaped space within a 60 inches by 60 inches minimum square with arms and base 36 inches wide minimum.</p> <p><b>(CA T24 11B-304.3.2) CARM page 306</b></p>

**a. Corrective Action:** Refer to the Corrective Action column above (Section A, 2).

**b. Recommendation:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 2).

**3. Facility Location: (6<sup>th</sup> Street, Point Reyes, CA)**

Facility Element/Finding	Corrective Action
<p><b>Disabled Parking:</b></p> <p>One parking sign to entrance to parking lot is missing.</p> <p>Note: A sign that can function as a street entry sign was posted on one of the parking spots.</p>	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space.</p> <p><b>(CA T24 11B-502.8) CARM page 159</b></p> <p>The additional sign shall not be less than 17 inches wide by 22 inches high.</p> <p><b>(CA T24 11B-502.8.1 Figure 4) CARM page 159</b></p> <p>The additional sign shall clearly state in letters with a minimum height of 1 inch the following: Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____.</p> <p><b>(CA T24 11B-502.8.2) CARM page 159</b></p>

Facility Element/Finding	Corrective Action
<p><i>Continued from previous page</i></p>	<p><i>Continued from previous page</i></p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign.</p> <p><b>(CA T24 11B-502.8.2) CARM page 159</b></p>
<p><b>All Gender Restroom:</b></p> <p>The All Gender restroom wall sign is too low. Needs to be mounted at 58 inches to 60 inches from the parking floor.</p>	<p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</b></p> <p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall.</p> <p><b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</b></p>
<p><b>Interview Room:</b></p> <p>Three Interview Rooms are Not ADA compliant – Rooms do not have a 60 inches diameter turnabout and table knee clearance is short at 9 inches.</p>	<p>Where the accessible route makes a 180 degree turn around an element which is less than 48 inches wide, clear width shall be 42 inches minimum approaching the turn, 48 inches minimum at the turn, and 42 inches minimum leaving the turn.</p> <p><b>(CA T24 11B-403.5.2) (ADA 403.5.2) CARM page 212</b></p> <p>The turning space shall be a space of 60 inches diameter minimum.</p> <p><b>(CA T24 11B-304.3.1) (ADA 304.3.1) CARM page 306</b></p> <p>The turning space shall be a T-shaped space within a 60 inches by 60 inches minimum square with arms and base 36 inches wide minimum.</p> <p><b>(CA T24 11B-304.3.2) CARM page 306</b></p> <p>Where knee clearance is required under an element as part of a clear floor space, the knee clearance shall be 11 inches minimum deep at 9 inches above the finish floor or ground and 8 inches minimum deep at 27 inches above the finish floor or ground.</p>

Facility Element/Finding	Corrective Action
<i>Continued from previous page</i>	<i>Continued from previous page</i>  <b>(CA T24 11B-306.3.3) (ADA 306.3.3) CARM page 305</b>  Knee clearance shall be 30 inches minimum wide.  <b>(CA T24 11B-306.3.5) (ADA 306.3.5) CARM page 305</b>

- a. **Corrective Action:** Refer to the Corrective Action column above (Section A, 3).
- b. **Recommendation:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 3).

**4. Facility Location: (75 Rowland Avenue, Novato, CA)**

Facility Element/Finding	Corrective Action
<b>Men's Restroom:</b>  Men's restroom wall ADA sign is missing.	Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.  <b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</b>  Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall.  <b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</b>
<b>Women's Restroom:</b>  Women's restroom wall ADA sign is missing.	Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.  <b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</b>  Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall.  <b>(CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</b>

Facility Element/Finding	Corrective Action
<p><b>Lobby – Receptionist:</b></p> <p>Receptionist was not able to provide a discrimination complaint form quickly. It took more than 10 minutes to find a form.</p>	<p>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 (example, cassette tapes, large print, etc.).</p> <p><b>(Div. 21-107.221)</b></p>

- a. **Corrective Action:** Refer to the Corrective Action column above (Section A, 3).
- b. **Recommendation:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 3).

## 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 it 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 (TDDs), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, counties must ensure that written materials be available in individuals’ primary languages if the forms and materials are provided by

CDSS in that language, 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**

<b>Question: (Please answer yes/no and provide response with comments)</b>	<b>Comments</b>
Does the County identify a client's language need upon first contact? How?	Yes, the County is able to access the client's language requirements on first contact by using an intake sheet where the questions are asked.
Does the County use a primary language form?	Yes, a primary language form is used.
Does the client self-declare on this form?	Yes, clients are able to self-declare.
Are non-English- or limited- English-speaking clients provided bilingual services?	Yes, non-English- or limited- English-speaking clients are provided bilingual services.
After it has been determined that the client is limited-English or non-English speaking, is there a County process for procuring an interpreter?	Yes, the County utilizes a process to procure interpretive services when needed.
Does the County have a contracted language line provider, a county interpreter list, or any other interpreter process?	Yes, the County has a contracted language line provider and a County interpreter list.
Is there a delay in providing interpretive services?	No, there is no delay. Interpretive services are provided quickly and efficiently in a reasonable amount of time.
Are County interpreters certified?	Yes, County interpreters are certified.
Does the County have adequate interpreter services?	Yes, the County has adequate interpreter services.
Does the County allow minors to be interpreters? If so, under what circumstances?	No, the County does not allow minors under the age of 18 to be interpreters.
Does the County allow the client to provide his or her own interpreter?	Yes, a client can bring their own interpreter, but the client is advised about possible misinformation regarding services.

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County ensure that the client-provided interpreter understands what is being interpreted for the client?	Yes, a client can bring their own interpreter, but they are advised about possible misinformation regarding services. The County worker is careful to explain the information and repeats any information delivered if necessary.
If there is not a Release of Confidentiality Information form, how and where is the client-provided interpreter documented?	At the time of the interview, a Release of Confidentiality Information form is given to the client and explained verbally.
Does the County use the CDSS-translated forms in the clients' primary languages?	Yes, the County is aware and does use the CDSS-translated forms in the clients' primary languages. They are aware of where to find them.
Is the information that is to be inserted into NOA translated into the client's primary language?	Yes, information inserted into the NOA is translated into the client's primary language and inserted into documents. The County sends NOA's in the client's primary language also.
If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language?	Yes, when there is no available translated language to insert into the NOA, the worker will work to get information translated. The form is also explained to the client.
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)?	Yes, the County is aware of auxiliary services and receptionists at all offices are aware of where to obtain these services to assist persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, and large print materials.
Does the County identify a client with a disability (physical, mental, or learning)?	Yes, at intake the County utilizes an intake form that assists in identifying a client's physical, mental, or learning needs.
Does the County assist clients with self-identifying a disability?	Yes, at intake staff asks the client if there are any reasonable accommodations the client may need.

<b>Question: (Please answer yes/no and provide response with comments)</b>	<b>Comments</b>
Does the County have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?	Yes, the County has a policy for assisting clients with a disability (physical, mental, or learning).
Does the County offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	Yes, at intake they ask the client to see if there are any reasonable accommodations the client may need.
Does the County identify and assist the client who has learning disabilities or a client who cannot read or write?	Yes, when a client has difficulty understanding or completing documents, the worker explains documents verbally to the client. The worker can also complete any paperwork necessary for the client.
Does the County offer a screening for learning disabilities?	Yes, the County has screening for learning disabilities.
Is there an established process for offering a screening?	Yes, the County has an established process for offering screening.
Is the client identified as having a learning disability referred for an evaluation?	Yes, Clients identified as having a learning disability are referred for an evaluation.

**B. Corrective Action:** None.

**C. Recommendation:** None.

## **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**

#### **CalFresh**

<b>Item</b>	<b>How item is Documented</b>
Ethnic Origin	Identified at client intake. Documented in case file.

Item	How item is Documented
Method of identifying client's primary language	Identified at client intake. Documented in case file.
Method of documenting client's primary language	Identified at client intake. Documented in case file.
Method of providing bilingual services and documentation	Identified at client intake. The client will be assigned to a bilingual worker and this is documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.
Method to inform client of potential problem using own interpreter	The client is advised verbally of potential problems using their own interpreter and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and the form is explained to the client. This is documented in the case file.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstance for using a minor is documented in the case file.
Method of identifying client's disability	The client self-identifies any disabilities.

Item	How item is Documented
Method of documenting client's disability (physical, mental, or learning)	When the client self-identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self-identifies any disability and an accommodation is offered or provided, it is documented in the case file and at every client interview the reasonable accommodation is acknowledged.

### **CalWORKs & Employment Services**

Item	How item is Documented
Ethnic Origin	Identified at client intake. Documented in case file.
Method of identifying client's primary language	Identified at client intake. Documented in case file.
Method of documenting client's primary language	Identified at client intake. Documented in case file.
Method of providing bilingual services and documentation	Identified at client intake. The client will be assigned to a bilingual worker and this is documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.
Method to inform client of potential problem using own interpreter	The client is advised verbally of potential problems using their own interpreter and the conversation is documented in the case file.

Item	How item is Documented
Release of information to interpreter	The client is given the release of information form and the form is explained to the client. This is documented in the case file.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstance for using a minor is documented in the case file.
Method of identifying client's disability	The client self-identifies any disabilities.
Method of documenting client's disability (physical, mental, or learning)	When the client self-identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self-identifies any disability and an accommodation is offered or provided, it is documented in the case file and at every client interview the reasonable accommodation is acknowledged.

## Welfare to Work

Item	How item is Documented
Ethnic Origin	Identified at client intake. Documented in case file.
Method of identifying client's primary language	Identified at client intake. Documented in case file.
Method of documenting client's primary language	Identified at client intake. Documented in case file.
Method of providing bilingual services and documentation	Identified at client intake. The client will be assigned to a bilingual worker and documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.
Method to inform client of potential problem using own interpreter	The client is advised verbally of potential problems using their own interpreter and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and the form is explained to the client. This is documented in the case file.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstance for using a minor is documented in the case file.

Item	How item is Documented
Method of identifying client's disability	The client self-identifies any disabilities.
Method of documenting client's disability (physical, mental, or learning)	When the client self-identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self identifies any disability, and an accommodation is offered or provided, it is documented in the case file and at every client interview the reasonable accommodation is acknowledged.

## Children's Services

Item	How item is Documented
Ethnic Origin	Identified at client intake. Documented in case file.
Method of identifying client's primary language	Identified at client intake. Documented in case file.
Method of documenting client's primary language	Identified at client intake. Documented in case file.
Method of providing bilingual services and documentation	Identified at client intake. The client will be assigned to a bilingual worker and documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.

Item	How item is Documented
Method to inform client of potential problem using own interpreter	The client is advised verbally of potential problems using their own interpreter and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and the form is explained to the client. This is documented in the case file.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstance for using a minor is documented in the case file.
Method of identifying client's disability	The client self-identifies any disabilities.
Method of documenting client's disability (physical, mental, or learning)	When the client self-identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self identifies any disability, and an accommodation is offered or provided, it is documented in the case file and at every client interview the reasonable accommodation is acknowledged.

**B. Corrective Action:** None.

**C. Recommendation:** None.

## **VII. STAFF DEVELOPMENT AND TRAINING**

Counties are required to provide civil rights, cultural awareness, Section 504 of the Rehabilitation Act of 1973 (Section 504), and ADA 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**

<b>Interview Questions: (Please answer yes/no and provide response with comments)</b>	<b>Comments</b>
Are employees trained in the requirement of Section 504 and ADA?	Yes, employees are trained on Section 504 and ADA requirements.
Do employees receive continued Division 21 Training?	Yes, Division 21 Training is accomplished annually.
Do employees understand the County policy regarding a client's rights and procedure to follow when receiving a discrimination complaint?	Yes, employees understand the County policy regarding a client's rights and procedure to follow when receiving a discrimination complaint. Though, as the Reviewer noted above, the receptionist at the 75 Rowland Avenue, Novato, CA location was unable to provide a discrimination complaint form quickly.
Does the County provide employees Cultural Awareness Training?	Yes, employees receive Cultural Awareness Training during the annual training.
Do the CSW's have an understanding of Multi-Ethnic Placement Act (MEPA)?	Yes, during the annual training employees receive Multi-Ethnic Placement Act (MEPA) training.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	Yes, in Marin County the employees seem knowledgeable about the predominant cultural groups receiving services in their area.

<b>Interview Questions: (Please answer yes/no and provide response with comments)</b>	<b>Comments</b>
Does the County provide training on how to identify clients with disabilities (physical, mental & learning)?	Yes, training on how to identify clients with disabilities (physical, mental & learning) is completed during the annual training.
Do employees receive training on reasonable accommodation for clients with disabilities?	Yes, reasonable accommodation training is given by the County. The Reviewer recommends a more complete reasonable accommodation syllabus to accommodate clients with disabilities.
Do the employees understand the County policy regarding a client's right to a reasonable accommodation?	Yes, training on the County policy regarding a client's right to a reasonable accommodation is accomplished during the annual training.

**B. Corrective Actions:** Refer to the Comment column above (Section A).

**C. Recommendation:** Address and submit a Corrective Action Plan to correct all items identified in the Comments column above (Section A).

## **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's responsibility to maintain this log.

### **A. Findings from Staff Interviews, Civil Rights Coordinator, and Program Manager Surveys**

<b>Interview and Review Areas: (Please answer yes/no and provide response with comments)</b>	<b>Findings</b>
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	Yes, utilizing the worker questionnaire it was summarized that employees can easily identify the difference between a program, discrimination, and a personnel complaint.

<b>Interview and Review Areas: (Please answer yes/no and provide response with comments)</b>	<b>Findings</b>
Do the employees know who the Civil Rights Coordinator is?	Yes, everyone asked in the County review, was able to identify the Civil Rights Coordinator.
Do the employees know the location of the Civil Rights poster "Everyone is Equal... (PUB 86)" with information as to how and  <i>Continued from previous page</i>  where the clients can file a discrimination complaint?	Yes, employees asked the location of the Civil Rights poster "Everyone is Equal... (PUB 86)" with information as to how and  <i>Continued from previous page</i>  where the clients can file a discrimination complaint all knew where to find it.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	Yes, the Civil Rights Coordinator keeps the complaint log complete and up to date.

**B. Corrective Action:** None.

**C. Recommendation:** None.

## **IX. VENDOR CONTRACTS**

Counties are required to ensure contracted services with contractors, vendors, consultants, and other providers of service, who receive state or federal assistance, include the assurance of compliance agreement.

### **A. Contracts Review**

Number of Contracts Reviewed	10
Number of Contracts with an Assurance of Compliance Agreement	10

**B. Corrective Action:** None.

**C. Recommendation:** None.

## **X. CALL CENTER EVALUATION**

County Call/Service Centers are evaluated to ensure services provided are nondiscriminatory toward non-English speaking clients and clients with a disability (physical, mental, or learning).

### **A. Findings from Call/Service Center site visit and interviews**

<b>Question: (Please answer yes/no and provide response with comments)</b>	<b>Comments</b>
Does the County have a Call Center/Service Center?	A Call Center is not being used in this County. The County is able to service all clients in regular offices.

**B. Corrective Action:** None.

**C. Recommendation:** None.

## **XI. COMMUNITY INPUT**

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups.

### **A. Major Observations**

Child Parent Institute – No observations were obtained. The Child Parent Institute was contacted by telephone. They had no input regarding services when working with the County.

Marin JCC Camp – No observations were obtained. The Marin JCC Camp was contacted by telephone. They had no input regarding services they felt needed to be addressed with the county.

## **XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL**

The Marin County Department for Health & Human Services Civil Rights Compliance Plan for the period April 1, 2018 to March 31, 2019, was received on March 28, 2018. It is approved as submitted.

### **XIII. CONCLUSION**

The CDSS Reviewer found the Marin County Department for Health & Human Services staff warm, welcoming, informative and very supportive. Particular thanks to John Bhambra, Civil Rights Coordinator, for organizing the details of the review, and to all County Staff 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 Marin County Department for Health & Human Services in satisfactory 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 Marin County Department for Health & Human Services must remedy the deficiencies identified in this report by taking corrective actions. A CAP 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 CDSS' intent that this report be used to create a positive interaction between the County and CDSS to identify and correct compliance violations and to provide the County with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights Unit staff is available to provide technical assistance as requested.