

January 11, 2019

Kathy Gallagher, Director  
Contra Costa County Employment & Human Services Department  
40 Douglas Drive  
Martinez, CA 94553

Dear Ms. Gallagher:

This letter is to advise you that the Corrective Action Plan you submitted on November 19, 2018 in response to the results of our May 14-18, 2018 Civil Rights Compliance Review is approved.

We will be monitoring the implementation of your corrective action items through your Civil Rights Coordinator. Please have Yrma Villarreal, Civil Rights Coordinator, provide our office with an update on corrective actions by March 19, 2019

If you have any questions, please contact Tiffany Marsh at (916) 654-2107. You may also contact your consultant by e-mail at [Tiffany.Marsh@dss.ca.gov](mailto:Tiffany.Marsh@dss.ca.gov).

Sincerely,

*Original signed by Christina Teixeira*

CHRISTINA TEIXEIRA, Manager  
Civil Rights Unit  
Housing, Homeless, and Civil Rights Branch  
Family Engagement and Empowerment Division

c: Yrma Villarreal, Civil Rights Coordinator

Kim McCoy Wade, Chief  
CalFresh Branch

Tami Gutierrez, Chief  
CalFresh Operations Bureau

Alexis Fernandez, Chief  
CalFresh Policy Bureau

Francisco Verduzco, Chief  
CalFresh Technical Assistance and Evaluation Section

Jacqueline Hom  
County Operations Manager

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

Maribelle Balbes, Chief  
USDA Food and Nutrition Services  
Supplemental Nutrition Assistance Program (SNAP)  
Western Region

Kevin Aslanian  
Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier  
Western Center on Law and Poverty

## CORRECTIVE ACTION PLAN – 2018

### CONTRA COSTA COUNTY- EHSD

#### Facility Accessibility for Individuals With Disabilities - 4545/4549 Delta Fair, Antioch, CA (Page 8)

Facility Element/Finding	Corrective Action Required	Correction Action Taken
<p>Parking (4545 Delta Fair) – There are two points of entry into the parking lot. One of the two entrances does not have the unauthorized parking signage posted.</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. The additional sign shall not be less than 17 inches wide by 22 inches high.</p> <p>The additional sign shall clearly state the following in letters with a minimum height of 1 inch:  “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>A work order clarifying the specifications of the sign has been submitted. The work is anticipated to be completed within 60 days if not sooner.</p> <p>The additional sign will include the mandatory text and include appropriate information as to where any towed vehicle may be reclaimed. Completion of the sign installation will be completed within 60 days if not sooner.</p>
<p>Parking – (4549 Delta Fair)</p> <p>There are two shared accessible parking spaces that do not have the</p>	<p>Parking identification signs shall be reflectorized with a minimum area of 70 square inches. Signs shall be 60 inches minimum above the finish</p>	<p>A work order with required specifications has been submitted. Corrective action will be completed within 60 days if not sooner.</p>

Facility Element/Finding	Corrective Action Required	Correction Action Taken
appropriate accessible parking signage posted.	<p>floor or ground surface measured to the bottom of the sign.</p> <p>Additional language or an additional sign below the international Symbol of Accessibility shall state "Minimum Fine \$250."</p>	<p>A work order has been submitted. Corrective action will be completed within 60 days if not sooner.</p>
<p>Men's Restroom (4545 Delta Fair) -</p> <p>The accessible urinal hand flush control operable part measures too high at 48 inches.</p>	<p>Hand operated flush controls shall be mounted at a maximum height of 44 inches above the finish floor.</p>	<p>A work order has been submitted. Corrective action will be completed within 60 days if not sooner.</p>
<p>Men and Women's Restroom (4545 Delta Fair) – The coat hook in the accessible stall measures more than 48 inches from finish floor.</p>	<p>Coat hooks shall be located within one of the reach ranges specified in Section 39, each Ranges &amp; Operable Parts.</p>	<p>This corrective action is completed. The coat hooks have been lowered to meet the specification of 48 inches.</p>
<p>Men and Women's Restroom (4545 Delta Fair) – The mounted paper towel and/or soap dispenser measures above 40 inches from finish floor.</p>	<p>All operable parts shall be 40 inches maximum above the finish floor.</p>	<p>This corrective action has been completed. The mounted paper towel dispenser and soap dispenser have been lowered to the required height.</p>
<p>Women's Restroom (4545 Delta Fair) – The toilet paper dispenser in the accessible stall is not located within 7 inches to 9 inches of the front edge of toilet.</p>	<p>Toilet paper dispensers shall be 7 inches minimum and 9 inches maximum in front of the water closet measured to the centerline of the dispenser.</p>	<p>The needed correction has been completed. The toilet paper dispenser has been moved to comply with the cited requirement and is now in compliance.</p>

**Facility Accessibility for Individuals With Disabilities - 1535 Fred Jackson, Richmond (Page 10)**

<b>Facility Element Deficiency</b>	<b>Corrective Action Required</b>	<b>Correction Action Taken</b>
Parking – The Accessible Parking signage did not have the additional language “Minimum Fine \$250.00” below the International Symbol of Accessibility.	Additional language or an additional sign below the International Symbol of Accessibility shall state “Minimum Fine \$250.”	This corrective action has been completed. An additional sign stating “Minimum Fine \$250” has been installed.
Main Entrance: The force used to open the door into the facility was excessive at 10 pounds.	The force for pushing or pulling open a door or gate other than fire doors shall be as follows:  Exterior hinged doors: 5 pounds maximum.	A work order has been submitted and corrective action is in progress. It is anticipated that the corrective action will be completed within 60 days, if not sooner.
Unisex Restroom – The door pressure was excessive at 9 lbs.	The interior doors are to be at 5 pounds maximum pressure.	A work order has been submitted. It is anticipated that the corrective action will be completed within 60 days if not sooner.
Unisex Restroom – The mounted towel/sanitary napkin dispenser, paper towel dispenser, and changing table measure above 40 inches from finish floor.	All operable parts shall be 40 inches maximum above the finish floor.	This corrective action has been completed. The dispensers and changing table have been lowered to 40 inches and are now in compliance.

**Facility Accessibility for Individuals With Disabilities - 1305 Macdonald Blvd., Richmond (Page 11)**

<b>Facility Element Deficiency</b>	<b>Corrective Action Required</b>	<b>Correction Action Taken</b>
Men’s Restroom: On the first floor, the mounted paper towel dispenser measure above 40 inches from finish floor.	Where towel or sanitary napkins, dispensers, waste receptacles or other accessories are provided in toilet facilities, at least one of each shall be located on an accessible	This corrective action has been completed. The paper towel dispenser has been lowered to

<b>Facility Element Deficiency</b>	<b>Corrective Action Required</b>	<b>Correction Action Taken</b>
	route. All operable parts shall be 40 inches maximum above the finish floor.	40 inches and is now in compliance.
Women's Restroom: On the first floor, the toilet paper dispenser in the accessible stall is not located within 7 inches to 9 inches of the front edge of toilet.	Toilet paper dispensers shall be 7 inches minimum and 9 inches maximum in front of the water closet measured to the centerline of the dispenser.	A work order has been submitted. It is anticipated that the corrective action will be completed within 60 days if not sooner.
Men and Women's Restroom – On the third floor, force used to open the doors was excessive at 10 pounds to 14 pounds.	The interior hinged doors are to be at 5 pounds maximum pressure.	A work order has been submitted. It is anticipated that the corrective action will be completed within 60 days if not sooner.
Men's Restroom – On the first floor, the mounted paper towel dispenser measures above 40 inches from finish floor.	All operable parts shall be 40 inches maximum above the finish floor.	This corrective action has been completed. The paper towel dispenser has been lowered to 40 inches and is now in compliance.

**Facility Accessibility for Individuals With Disabilities - 1275A Hall Avenue, Richmond (Page 12)**

<b>Facility Element Deficiency</b>	<b>Corrective Action Required</b>	<b>Correction Action Taken</b>
Parking – The Accessible Parking signage did not have the additional language "Minimum Fine \$250.00" below the International Symbol of Accessibility.	Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250."	This corrective action has been completed. An additional sign stating "Minimum Fine \$250" has been installed.

**Facility Accessibility for Individuals With Disabilities - 400 Ellinwood Way, Pleasant Hill (Page 12)**

<b>Facility Element Deficiency</b>	<b>Corrective Action Required</b>	<b>Correction Action Taken</b>
Parking – The Accessible Parking signage nearest the entrance door does not have the additional language “Minimum Fine \$250.00” below the International Symbol of Accessibility.	Additional language or an additional sign below the International Symbol of Accessibility shall state “Minimum Fine \$250.”	This corrective action has been completed. The additional sign has been posted and is now in compliance.
Unisex Restroom: In the interview area, the force used to open the doors was excessive at 15 pounds.	The interior hinged doors are to be at 5 pounds maximum pressure.	This corrective action has been completed. The force of the door has been adjusted to 5 pounds.

**V. Provision for Services to Applicants and Recipients Who Are Non-English Speaking or Who Have Disabilities (Page 12)**

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking populations and individuals with disabilities without undue delays.

**A: Item A includes findings from Division Manager surveys, staff interviews and case file reviews.**

**B: Corrective Action Needed for findings in Item A: None**

**VI. Documentation of Applicant/Recipient Records (Page 16)**

<b>Areas of Action</b>	<b>Corrective Action Required</b>	<b>Correction Action Taken</b>
Documentation if client provided own interpreter.	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the	An All Staff Memo will be issued within 30 days reminding staff of said requirement.

Areas of Action	Corrective Action Required	Correction Action Taken
	applicants/recipients were so informed.	The requirement will be reinforced through the EHSD mandatory Civil Rights Training.
Documentation of signed Confidentiality Statement.	Consent for the release of information shall be obtained when individuals other than county employees provides language services. The case record shall be documented and the form retained in the case record.	An All Staff Memo will be issued within 30 days reminding staff of said requirement.  The requirement will be reinforced through the EHSD mandatory Civil Rights Training.
Documentation that bilingual services were provided.	Document the method used to provide bilingual services for example, assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter.	An All Staff Memo will be issued within 30 days reminding staff of said requirement.  The requirement will be reinforced through the EHSD mandatory Civil Rights Training.
General	Contra Costa County must ensure that proper documentation is kept in the case file that identifies all the required elements to ensure compliance.	An All Staff Memo will be issued within 30 days reminding staff of said requirement.  The requirement will be reinforced through the EHSD mandatory Civil Rights Training.

## VII. Staff Development and Training (Page 21)

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: Item A includes findings of the EHSD Staff Development Civil Rights Training.**

**B: Corrective action needed for findings in Item A: None**

#### **VIII. Discrimination Complaint Procedures (Page 23)**

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: Item A includes findings from staff interviews, Civil Rights Coordinator, and review of Division Manager Surveys**

**B: Corrective action needed for findings in Item A: None**

#### **IX. Vendor Contracts (Page 23)**

##### **A: Contracts Review**

Number of Contracts Reviewed	<b>19</b>
Number of Contracts with an Assurance of Compliance Agreement	<b>19</b>

**B: Corrective action needed: 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 (Page 24)**

<b>Question: (Please answer yes/no and provide response with comments)</b>	<b>Comments</b>
Does the County have a Call Center/Service Center?	Yes. The Call Center was not reviewed during this Compliance Review.

**B: Corrective action needed:** None

## **XI. Community Input (Page 24)**

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups. The following summarizes their observations, and identifies issues that the County management team can address to improve operations from a civil rights perspective.

### **EHSD Response to Major Observation Items:**

The feedback has been shared with the County management team, personnel staff and Staff Development staff. Contra Costa County – EHSD is committed to being in full compliance with all Civil Rights and ADA laws. EHSD will continue to work with community partners in identifying problem areas to ensure equal access, assistance and compliance.