

May 16, 2019

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 19-45

The purpose of this ACL is to remind CWDs of their ongoing obligation to ensure equal and meaningful access for individuals with disabilities to state and federally funded public assistance and social service programs, in accordance with Section 504 of the Rehabilitation Act of 1973, Title II of the ADA, and California Government Code Section 11135.



May 16, 2019

ALL COUNTY LETTER (ACL) NO. 19-45

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY CHILD WELFARE DIRECTORS
ALL COUNTY CIVIL RIGHTS COORDINATORS
ALL CALFRESH PROGRAM SPECIALISTS
ALL CALWORKS PROGRAM SPECIALISTS
ALL REFUGEE PROGRAM MANAGERS
ALL CAPI PROGRAM MANAGERS
ALL IHSS PROGRAM MANAGERS
ALL MEDI-CAL PROGRAM SPECIALISTS/LIAISONS
ALL COUNTY CHILD WELFARE PROGRAM MANAGERS

SUBJECT: PROHIBITION OF DISCRIMINATION AGAINST QUALIFIED INDIVIDUALS WITH DISABILITIES IN COUNTY WELFARE DEPARTMENT (CWD) ADMINISTERED PROGRAMS, SERVICES, AND ACTIVITIES FUNDED BY THE CALIFORNIA DEPARTMENT OF SOCIAL SERVICES (CDSS) AND DEPARTMENT OF HEALTH CARE SERVICES (DHCS)

REFERENCE: [SECTION 504 OF THE REHABILITATION ACT OF 1973 \(29 U.S.C. § 794\); TITLE II AND TITLE III OF THE AMERICANS WITH DISABILITIES ACT \(ADA\) OF 1990, AS AMENDED BY THE ADA AMENDMENT ACT OF 2008 \(42 U.S.C. §§ 12131–12189\) AS IMPLEMENTED BY DEPARTMENT OF JUSTICE REGULATIONS AT 28 CODE OF FEDERAL REGULATIONS \(CFR\) PARTS 35 AND 36; CALIFORNIA GOVERNMENT CODE, SECTION 11135 ET SEQ., CALIFORNIA DISABLED PERSONS ACT \(CIV. CODE § 54 ET SEQ.\), THE UNRUH CIVIL RIGHTS ACT, CALIFORNIA CIVIL CODE, SECTION 51 ET SEQ., AS AMENDED; CDSS MANUAL OF POLICIES AND PROCEDURES \(MPP\) DIVISION 21, CIVIL RIGHTS, NONDISCRIMINATION IN FEDERALLY ASSISTED PROGRAMS; ACL NO.15-31; ACL NO. 01-42, AND DHCS STATE PLAN SECTIONS 7.2A AND 7.2B.](#)

The purpose of this ACL is to remind CWDs of their ongoing obligation to ensure equal and meaningful access for individuals with disabilities to state and federally funded public assistance and social service programs, in accordance with Section 504 of the Rehabilitation Act of 1973, Title II of the ADA, and California Government Code Section 11135.

As local government entities and recipients of federal and state financial assistance, CWDs have a responsibility to ensure that people with disabilities are not excluded from participation in or denied the benefits of the CWD's programs, services or activities, or otherwise subject to discrimination. This includes the obligation to provide reasonable accommodations to qualified individuals with disabilities and effective communication through auxiliary aids and services. (Reasonable accommodations and auxiliary aids and services will be defined and discussed further below.)

Scope of this ACL

This ACL applies broadly to all CWD-administered programs, services, and activities funded by, or with federal pass-through funds from, CDSS and/or DHCS. It addresses CWDs' nondiscrimination obligations to clients, including applicants, recipients, participants, and other qualified individuals with disabilities. The responsibilities discussed in this ACL apply to CWDs as well as CWDs' contractors and vendors that provide program benefits and services directly to applicants, recipients, participants, clients, and other qualified individuals with disabilities. These nondiscrimination obligations are not new. Rather, this ACL provides guidance on existing obligations of all CDSS- and DHCS- funded, CWD-administered programs, services and activities.

This ACL is the first in a series of ACLs providing guidance to CWDs on this topic. Upcoming ACLs will provide program-specific direction, guidance and best practices, and will respond to program-specific questions.

This ACL is not an exhaustive restatement of all disability laws and regulations applicable to CWDs. For example, this ACL does not address CWDs' obligations to their employees with disabilities under the ADA or other laws. It also does not address accessibility requirements for design, construction or alteration of facilities, or CWDs' obligations as places of public accommodation under Title III of the ADA. CWD staff should seek the assistance of their county's ADA Coordinator or County Counsel for further specific information and guidance on how to comply with these other disability nondiscrimination requirements.

I. Written Policies and Training on Disability Discrimination

CWDs, to the extent that they have not already, shall adopt written policies detailing how they will comply with the requirements set forth in this letter. These policies shall be submitted to CDSS annually as part of each CWD's County Civil Rights Plan pursuant to CDSS MPP Section 21-201.22. Until the Civil Rights Compliance Plan

Guidelines are updated, CWDs may submit the relevant policies as an attachment or appendix to their existing Plans.

CWDs shall train public contact staff, program managers, and supervisors upon hire and, at a minimum, annually thereafter, on the CWD's policies for ensuring compliance with disability nondiscrimination laws and on providing reasonable accommodations for people with disabilities.

II. Disability Discrimination Complaint Procedure

CWDs must have a procedure for resolving complaints of discrimination on the basis of disability, including the failure to provide a reasonable accommodation. (28 CFR § 35.107(b)). For CDSS-funded programs, this process should follow the guidelines provided in CDSS MPP Section 21-203. For Medi-Cal, DHCS will provide further guidance regarding the civil rights and disability discrimination complaint process in a forthcoming ACL.

CWD staff shall provide clients with information regarding the complaint process, including how to file a complaint with the CWD's Civil Rights Coordinator and the County's ADA Coordinator.

CWD staff shall also inform clients that they may file discrimination complaints involving the following programs with the relevant agencies:

State: **CDSS-funded programs:**
California Department of Social Services
Civil Rights Unit
P.O. Box 944243, Mail Station 8-16-70
Sacramento, CA 94244-2430
(866) 741-6241
crb@dss.ca.gov

Medi-Cal:
Department of Health Care Services
Office of Civil Rights
P.O. Box 997413, Mail Station 0009
Sacramento, CA 95899-7413
(916) 440-7370
CivilRights@dhcs.ca.gov

Federal: **CalFresh:**
United States Department of Agriculture
Director, Office of Adjudication
1400 Independence Avenue, S.W.
Washington, D.C., 20250-9410
(866) 632-9992
program.intake@usda.gov

All other federally-funded, CWD-administered programs:

United States Department Health and Human Services
Centralized Case Management Operation
200 Independence Ave., S.W. Room 509F HHH Building
Washington D.C., 20201
(800) 368-1019
ocrcomplaint@hhs.gov

III. Who is Protected?

Title II of the ADA prohibits CWDs from excluding from participation, denying benefits and services to, or discriminating against any qualified individual with a disability. (42 U.S.C. § 12132.)

The term “**qualified individual with a disability**” means an individual with a disability who, *with or without* reasonable modifications to rules, policies, or practices, the removal of architectural, communication, or transportation barriers, or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by a public entity. (42 U.S.C. § 12131.)

Under the ADA and Section 504 of the Rehabilitation Act, the term “**disability**” is defined as a physical or mental impairment that substantially limits one or more major life activities, a record of such an impairment, or being regarded as having such an impairment. (42 U.S.C. § 12102(1).)

This is a broad definition, covering many individuals. It is much broader than the definition of disability under various disability benefits programs and covers many people who do not receive and do not qualify for disability benefits.

The key concepts in this definition of disability are further explained below:

Impairments can be physical or mental. Examples of physical and mental impairments include but are not limited to:

- **Physical:** blindness, low vision, deafness, hearing impairment, cerebral palsy, orthopedic conditions, epilepsy, tuberculosis, diabetes, cancer, multiple sclerosis, heart disease, HIV.
- **Mental:** intellectual disabilities, organic brain syndrome, major depressive disorder, bipolar disorder, post-traumatic stress disorder, attention deficit disorder, autism, or learning disabilities such as dyslexia. (28 CFR § 35.108(b) and (d)(2)(iii).)

Major life activities include:

- Everyday tasks and functions, including, but not limited to walking, standing, lifting, bending, performing manual tasks, speaking, hearing, seeing, breathing, communicating, eating, sleeping, taking care of oneself, learning, reading, following instructions, concentrating, thinking, remembering, interacting with others, and working; and
- Major bodily functions, including, but not limited to bladder, bowel, genitourinary, digestive, immune system, respiratory, cell growth, brain, neurological, circulatory, cardiovascular, special sense organs and skin, hemic, lymphatic, musculoskeletal, endocrine, and reproductive functions. (28 CFR § 35.108(c)(1).)

For an impairment to **substantially limit** a major life activity, the person must have greater difficulty performing the activity than most people in the general population. (28 CFR § 35.108(d)(1)(v).)

Under California law, the definition of disability is even broader than the ADA definition. In California, disabilities are defined as conditions that limit a major life activity. There is no requirement, as under federal law, that the limitation be “substantial.” This means that some conditions that are not protected under the ADA may be protected in California. (Gov. Code § 12926(j) and (m).)

The definition of disability under the ADA also includes people who have a **record of a disability**, whether or not they are currently disabled, or who are **regarded as having a disability**, whether or not they are actually disabled. (28 CFR § 35.108(a)(1).) This means that discriminatory treatment of an individual because they are perceived as having a disability or were, in the past, disabled, are both prohibited under the ADA.

The ADA also guarantees equal access to individuals who are known by the CWD to have a **relationship or association** with someone with a known disability. (28 CFR § 35.130(g).)

The ADA does not require public entities to allow a person with a disability to participate in or benefit from its programs, services, or activities if that person poses a **direct threat** to the health or safety of others. (28 CFR § 35.139.) A direct threat is defined as a

significant risk to the health or safety of others that cannot be eliminated or reduced to an acceptable level by modification of policies, practices, or procedures (i.e. a reasonable accommodation), or by the use of auxiliary aids or services. The determination that someone poses a direct threat must be based on objective factual evidence and an individualized assessment. Factors to consider in determining whether an individual poses a direct threat include:

1. The nature, duration, and severity of the risk;
2. The probability that the potential injury will actually occur; and,
3. Whether reasonable modifications of policies, practices, or procedures will mitigate or eliminate the risk.
(28 CFR § 35.139.)

Even when an individual poses a significant or ongoing safety risk to others, CWD staff must still consider the third factor outlined above, i.e. whether some modification of policies, practices, or procedures could mitigate or eliminate that risk. For example, an individual who experiences unpredictable and severe episodes of violence due to a mental health disability might pose a serious risk to staff or members of the public in a CWD office. However, if the CWD can modify its policies, practices, or procedures to allow that person to conduct all business via mail, telephone, or email, without having to physically come to the CWD office, that individual would not pose a direct threat and would therefore be entitled to equal access to the CWD's programs, services and activities. More information on reasonable modifications of policies, practices, and procedures is provided in the next section.

IV. Reasonable Modifications to Policies, Practices, and Procedures

Title II of the ADA and California Government Code Section 11135 require CWDs to make **reasonable modifications** (also known as **reasonable accommodations**)¹ to their policies, practices, and procedures when necessary to provide equal access to people with disabilities. (28 CFR § 35.130(b)(7)(i).)

Reasonable accommodations may be necessary to allow a qualified individual with a disability to access a program or service, to comply with program requirements, to participate fully in programs, services and activities, or to avoid potential sanctions for disability-related noncompliance with program rules. A reasonable modification may take the form of a waiver of a program rule or policy in order to help a person with a disability, or a change in the way that the CWD carries out a policy or practice affecting a person with a disability.

¹ The term reasonable modification appears in, and is defined differently in, other laws. However, this ACL refers only to the definition of reasonable modification contained in the ADA. This ACL uses the terms reasonable modification and reasonable accommodation interchangeably.

The following rules and guidelines apply to the provision of reasonable accommodations by CWDs:

- 1. Notice.** CWDs shall notify all clients, applicants, participants, recipients, beneficiaries, and other interested persons of the right to request reasonable accommodations and the protections against discrimination on the basis of disability. (28 CFR § 35.106.) Notice shall be provided in accessible formats. Further program-specific guidance regarding notice of rights will be provided in forthcoming ACLs.
- 2. Identification of disabilities.** Some individuals may be unaware that they have a disability or unable or reluctant to self-identify as having a disability. When the CWD has actual knowledge of an individual's disability, or when an individual's need for an accommodation is obvious, CWD staff shall offer to assist the individual in self-identifying the disability and/or appropriate disability-specific accommodations. (See *Duvall v. County of Kitsap*, 260 F.3d 1124, 1139 (9th Cir. 2001).) CWDs are also encouraged to train staff to identify possible signs of disabilities and offer to assist individuals in self-identifying the disability and/or appropriate disability-specific accommodations when a disability or a need for an accommodation is suspected but not known. Further guidance on this topic will be provided in forthcoming program-specific ACLs.
- 3. Requests for reasonable accommodations.** While CWDs may make available a reasonable accommodation request form, CWDs may not require individuals to use a specific form to request an accommodation. Whenever an individual asks for a change in the normal policies, practices, or procedures of the CWD because of a disability, this should be treated as a reasonable accommodation request. A non-disabled individual may also request an accommodation that is needed due to the disability of another person with whom they are associated, such as a family member. (For example, a parent with a disabled child may need an accommodation if the child's disability prevents the family from being able to wait in a crowded waiting room.) Reasonable accommodation requests may be made in person, by telephone, or in writing by an individual or another acting on the individual's behalf. It is not necessary that the person requesting the accommodation on another's behalf be an authorized representative. There is no limit to the amount of reasonable accommodation requests a person may make, and each request must undergo an individualized analysis.
- 4. Documenting reasonable accommodations.** CWD staff shall document all requests for reasonable accommodations and subsequent actions taken by CWD staff in the individual's case file. Documentation shall include the following information:

- The fact that the individual has a disability and/or requested an accommodation. (The disability itself may be documented if disclosed by the client, but the client is not required to provide a specific diagnosis.);
- The accommodation(s) requested by the client;
- The accommodation(s) provided to the client.

Specific guidance regarding documentation and tracking of reasonable accommodations in the Statewide Automated Welfare Systems (SAWS), Case Management, Information and Payrolling System (CMIPS), and Child Welfare Services/Case Management System (CWS/CMS) will be provided in future ACLs.

- 5. When to provide reasonable accommodations.** Providing reasonable accommodations is an ongoing obligation of CWD staff, not one that is solely determined at an individual's first contact, application, or intake. Individuals' needs and program participation requirements can change, presenting new circumstances and the potential need for new or modified accommodations. Whenever such a need arises, CWD staff shall afford the individual a new or modified accommodation and document it in the client's file. Similarly, there should be no arbitrary limit imposed by the CWD on the duration of an accommodation provided to an individual. In the case of permanent or ongoing disabilities, individuals should be provided accommodations on an ongoing basis without the need to make multiple requests.
- 6. Interactive process.** If an accommodation is not immediately agreed upon, or if a disagreement arises between an individual and CWD staff as to the appropriateness of a particular accommodation after an accommodation has been granted, CWD staff shall engage in an interactive process with the individual requesting the accommodation, or the person acting on their behalf. This may include discussing the individual's needs and alternate accommodation options in order to arrive at an accommodation that meets the needs of both the individual and the CWD. (28 CFR § 35.150(a)(3).)
- 7. Denial of reasonable accommodation requests.** A CWD may refuse the request of a qualified individual with a disability to modify a CWD policy, practice, or procedure only when the requested accommodation would:
 - fundamentally alter the nature of the program, service or activity, or
 - impose an undue financial or administrative burden, taking into account all resources available to the program, service, or activity.(28 CFR § 35.150.)

The decision that a requested accommodation would result in a fundamental alteration or an undue burden must be:

- made by the County Welfare Director or their designee and
- accompanied by a written statement of the reasons for the decision. (28 CFR § 35.150.)

If such a decision is made, the CWD must take an alternative action to ensure that the individual with a disability can access the relevant benefits or services while avoiding a fundamental alteration or undue burdens. (28 CFR § 35.150.) If a reasonable accommodation request is denied, CWD staff shall inform the individual in writing that their reasonable accommodation request is denied, the reasons for the denial, and any other accommodations offered and/or provided, and document that information in the client's case file.

In addition to the requirement that CWDs make reasonable modifications to policies, practices, and procedures, CWDs are prohibited from imposing any eligibility criteria that exclude or tend to screen out an individual with a disability or any class of individuals with disabilities from fully and equally enjoying any service, program, or activity, unless such criteria can be shown to be necessary for the provision of the service, program, or activity being offered. (28 CFR § 35.130(b)(8).)

CWDs shall provide all programs, services, and activities in the most integrated manner possible. (28 CFR § 35.130(d).) This means services for disabled individuals should not be provided in a separate setting or different manner, unless doing so is necessary to ensure that the individual receives service that is equally effective as the service provided to people without disabilities.

CWDs shall not charge individuals with disabilities to cover the cost of program accessibility, auxiliary aids or services, or other measures that are necessary to provide equal access or avoid discrimination on the basis of disability. (28 CFR § 35.130(f).)

V. Effective Communication

CWDs have the obligation, pursuant to ADA Title II, to ensure effective communication with individuals who have vision, hearing, or speech disabilities. Communication with these individuals must be equally effective as communication with people who do not have these disabilities. (28 CFR § 35.160(a).) The requirement for effective communication extends not only to applicants or participants in CWD programs and services, but also to their companions. A **companion** is defined as “a family member, friend, or associate of an individual seeking access to a service, program, or activity. . . who, along with such individual, is an appropriate person with whom the public entity should communicate.” (28 CFR § 35.160(a).)

CWDs must provide individuals with disabilities with **auxiliary aids and services** when necessary to communicate effectively. (28 CFR § 35.160(b)(1).) Auxiliary aids and services must be provided in a timely manner, and in a way that respects the privacy and independence of the person with a disability. (28 CFR § 35.160(b)(2).)

For people who are blind, have vision loss, or are deaf-blind, auxiliary aids and services may include providing written communication (including forms, notices, correspondence, or other information) in large print, braille, accessible electronic format for use with a screen reader, or via audio recording or a qualified reader. (28 CFR § 35.104.)

A **qualified reader** is someone who can read effectively, accurately, and impartially, using any necessary specialized vocabulary. (28 CFR § 35.104.)

For people who are deaf, have hearing loss, or are deaf-blind, auxiliary aids and services may include providing a notetaker, a qualified sign language, oral, cued-speech or tactile interpreter, real-time captioning, telecommunications devices or systems, or written materials. (28 CFR § 35.104.) A **qualified interpreter** is someone who is able to interpret effectively, accurately, and impartially using any necessary specialized vocabulary. (28 CFR § 35.104.) Some deaf individuals, particularly persons who use a foreign sign language, who have other linguistic impairments, or who are facing extremely stressful or high-stakes situations may require a Certified Deaf Interpreter or other deaf relay interpreter paired with an American Sign Language interpreter to effectively communicate.

For people who have speech disabilities, auxiliary aids and services may include providing a qualified transliterator—a person trained to recognize unclear speech and repeat it clearly—especially if the person will be speaking for a long time. (28 CFR § 35.104; [ADA Requirements: Effective Communication](#), U.S. Department of Justice Civil Rights Division, Disability Rights Section.) Effective communication for an individual with a speech disability may require additional time for the individual to use a communication board, pencil and paper, or other device. ([ADA Requirements: Effective Communication](#), U.S. Department of Justice Civil Rights Division, Disability Rights Section.)

As with spoken language interpretation for Limited English Proficient persons, CWDs may not require an individual with a communication disability to provide their own interpreter. (28 CFR § 35.160(c)(1).) CWDs may permit another adult accompanying an individual with a disability to interpret only under the following circumstances:

- in an emergency situation involving a threat to the safety or welfare of an individual or the public and no interpreter is available, or
- when specifically requested by the individual with a disability, the accompanying adult agrees, and assistance by the accompanying adult is appropriate under the circumstances.

(28 CFR § 35.160(c)(2).)

CWDs shall not rely on minor children to interpret except in an emergency involving a threat to the safety or welfare of an individual or the public, and when no interpreter is available. (28 CFR § 35.160(c)(2).)

If CWDs opt to use Video Remote Interpreting (VRI) to provide effective communication services to individuals with disabilities, the VRI service must meet specific technical performance standards. (28 CFR § 35.160(d).) CWDs should consult ADA Title II regulations at 28 CFR Section 35.161 for additional requirements regarding telecommunications technology.

When deciding what auxiliary aids or services are necessary to provide effective communication, CWDs should consider how an individual normally communicates, as well as the nature, length, complexity, and context of the communication. (28 CFR § 35.160(b)(2).) If an individual with a disability requests a particular auxiliary aid or service, the CWD must give **primary consideration** to that request. (28 CFR § 35.160(b)(2).) This means that the individual's choice of auxiliary aid or service must be granted *unless* the CWD can demonstrate that:

- an equally effective means of communication is available; or
 - the individual's chosen means of communication would result in a fundamental alteration to the program, service, or activity; or
 - the individual's chosen means of communication would impose an undue financial or administrative burden on the CWD, taking into account all resources available to the program, service, or activity.
- (28 CFR § 35.164.)

As with other requests for reasonable accommodations, the decision that a particular aid or service would result in a fundamental alteration or an undue financial or administrative burden must be made by the County Welfare Director or their designee and must be accompanied by a written statement of the reasons for the decision. If such a decision is made, the CWD must still provide an effective alternative aid or service if one is available. (28 CFR part 35, appendix A.)

VI. Service Animals

Pursuant to ADA Title II regulations, CWDs must modify their policies, practices and procedures to allow individuals with disabilities to use service animals on their premises. The California Disabled Persons Act imposes the same requirements as ADA Title II regulations with regard to access for persons with service animals. (Civ. Code § 54.1(a)(3).) CWDs must allow service animals in all areas of their facilities where members of the public or participants in services, programs or activities are normally permitted. (28 CFR § 35.136(g).)

Only dogs are recognized as service animals under Title II of the ADA. Specifically, a **service animal** is defined as a dog that is individually trained to do work or perform tasks for an individual with a disability. (28 CFR § 35.104.) The work or tasks performed by a service animal must be directly related to the individual's disability. (28 CFR § 35.104.) Some examples of work or tasks performed by service animals include guiding people who are blind, alerting people who are deaf to sounds or people, pulling

a wheelchair, assisting a person having a seizure, and reminding an individual with mental illness to take medication. (28 CFR § 35.104.) A dog that provides only emotional support, comfort, or companionship does not qualify as a service animal. (28 CFR § 35.104.)

When it is not obvious what service a service animal provides, CWD staff may ask only two questions:

1. Is the animal required because of a disability?
2. What work or tasks is the animal trained to perform?
(28 CFR § 35.136(f).)

CWDs may not require certification or other proof that an animal has been trained or licensed as a service animal. (28 CFR § 35.136(f).)

CWDs may only ask an individual to remove their service animal from the premises if:

- the animal is out of control and the handler does not take effective action to control it, or
- the animal is not housebroken.
(28 CFR § 35.136(b).)

If CWD staff request that an individual's service animal be removed on the basis of one of the above reasons, they must offer the person the opportunity to participate in the program, service, or activity without the animal's presence. (28 CFR § 35.136(c).)

CWDs should refer to ADA Title II regulations at 28 CFR Section 35.136 for additional rules regarding service animals, including provisions regarding appropriate control by the handler, care and supervision, charges for damages incurred, and miniature horses.

VI. Resources

The following resources provide general information, guidance, and technical assistance on Title II of the ADA:

- [Revised Final Title II Rule](https://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm)
(https://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm): A Compilation of Regulatory Provisions and Guidance -- Nondiscrimination on the Basis of Disability in State and Local Government Services
- [ADA Title II Technical Assistance Manual, US Department of Justice, Civil Rights Division](https://www.ada.gov/taman2.html) (<https://www.ada.gov/taman2.html>)

- [ADA Best Practices Tool Kit for State and Local Governments, US Department of Justice, Civil Rights Division](https://www.ada.gov/pcatoolkit/toolkitmain.htm) (https://www.ada.gov/pcatoolkit/toolkitmain.htm)
- [ADA Title II Tutorial, ADA National Network](https://www.adatitle2.org/) (https://www.adatitle2.org/)
- Effective Communication
 - [Effective Communication, US Department of Justice, Civil Rights Division, Disability Rights Section](https://www.ada.gov/effective-comm.htm) (https://www.ada.gov/effective-comm.htm)
- Service Animals
 - [ADA Requirements: Service Animals, US Department of Justice, Civil Rights Division, Disability Rights Section](https://www.ada.gov/service_animals_2010.htm) (https://www.ada.gov/service_animals_2010.htm)
 - [Frequently Asked Questions about Service Animals and the ADA, US Department of Justice, Civil Rights Division, Disability Rights Section](https://www.ada.gov/regs2010/service_animal_qa.html) (https://www.ada.gov/regs2010/service_animal_qa.html)

If you have questions about the application of this ACL to CDSS-funded programs, please contact the CDSS Civil Rights Unit at (916) 654-2107, toll free at (866) 741-6241, or by [email](mailto:crb@dss.ca.gov) (crb@dss.ca.gov). For Medi-Cal related questions, please contact the DHCS Office of Civil Rights at (916) 440-7370, option 4.

Sincerely,

Original Document Signed By:

KIM JOHNSON
Deputy Director, Family Engagement and Empowerment Division
California Department of Social Services

Original Document Signed By:

SANDRA WILLIAMS
Chief, Medi-Cal Eligibility Division
Department of Health Care Services