



# PLACER COUNTY HEALTH AND HUMAN SERVICES

Civil Rights Corrective Action Plan  
FFY 2021

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## Introduction

Placer County Health and Human Services (HHS) greatly appreciated the professionalism and dedication to the Civil Rights exhibited by the California Department of Social Services (CDSS) Civil Rights Unit staff during the review. We strive to deliver the best service possible to our community and greatly appreciated the opportunity to get feedback from CDSS as it helps with our goal of constant improvement.

The following report is formatted similarly to the Civil Rights Final reports received from CDSS on September 10, 2021, for ease of review. We look forward to having CDSS return to Placer County HHS in the future for continued collaboration.

## Section III. Dissemination of Information - Compliance Issues(s)

1. Directional and instructional signage: The County shall ensure that instructional and directional signs are posted in waiting areas and other places. In areas that are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages. The County shall assess which translations are required for all instructional and directional signs at all office locations and ensure all office locations are compliant with these requirements.

**Placer County Response: Directional and instructional signs in Russian, English, and Spanish will be posted in all lobbies and waiting areas.**

2. Translated PUB 13: The County shall ensure the PUB 13 is available in all lobbies in all languages translated by CDSS. Div. 21-115.2, 21-107.22. The PUB 13 must be available in the most recent revision. The County may access the most recent translated versions of the PUB 13 on [CDSS website](#). To the extent that materials are available outside of offices (e.g., due to office closures), the PUB 13 should be available outside in all languages translated by CDSS. Please note that revisions to the PUB 13 will be made before the end of 2021. Civil Rights Coordinators will be made aware when revised versions are available.

**Placer County Response: The most current translated version of the PUB 13 will be made available inside and outside of the office, when required, in all languages translated by CDSS.**



3. PUB 13 in alternate formats: The County shall ensure the availability of large print, braille, and auditory aids for participants in all programs for which CDSS has oversight responsibility. Div. 21-115.4. The County shall furnish all offices with braille, large print, and audio recordings of the PUB 13 based on the most recent revision of the PUB 13. Counties are responsible ensuring the availability of the current PUB 13 in braille. As part of the CAP, the County shall develop written protocol and/or processes for:
  - a. Obtaining a braille translation of the PUB 13 including future revisions;
  - b. Maintaining copies of the most current braille translation at all facility locations so that applicants/recipients can take one home if needed;
  - c. Maintaining a supply of the most current PUB 13 in audio recordings and large print formats at each location; and
  - d. Removing and replacing outdated versions of the PUB 13 once new revisions have been issued.
  - e. To the extent programs have different practices and considerations related to the provision of PUB 13 in alternate formats, the protocol shall contain program-specific guidance. These concepts should also be addressed in a County reasonable accommodation policy.

**Placer County Response: A written process will be developed including program specific guidance on providing the PUB 13 in alternate formats. Guidance will include ordering, maintaining supply and updating revisions when required. Existing formats (audio and large print versions) will be reviewed and updated as required. Braille versions of the PUB 13 ordered with enough supply to allow the customer to take home, if desired. Revised versions in all formats will be made available in all offices. All items in section three will be addressed by December 2021.**

**Updated Placer County Response: Although in progress, corrective action timeframe originally proposed did not take into account the required steps across all office including sign inventory, consolidation, ordering, translation, posting. Given these steps the county now expects to complete Item #1, #2 and #3 by 3/31/2022.**

**Updated Placer County Response: Steps #1, #2, and #3 have been completed.**

#### Section IV. Facility Accessibility for Individuals with Disabilities

*Facility Location: Dewitt – CalFresh/CalWORKs Office*

##### **4. Parking and Route to Main Door**

- a. Accessible parking spaces 1 through 6 are marked with an International Symbol of Accessibility (ISA); however, the ISAs are all faded and require repainting.

**Placer County Response: ISA's at accessible parking to be repainted.  
Updated Placer County Response: Completion date 3/31/22.**

- b. Contrasting stripes on treads and upper approach of stairway on accessible route are too narrow at 1 inch wide.

**Placer County Response: Replace/repaint contrasting stripes on treads to be compliant width.**

**Updated Placer County Response: Completion date 3/31/22.**

- c. Running slope of ramp run is presented as a percentage at 11.6 percent, rather than a ratio. Cross slope of ramp run is not provided. Actual measurements presented as ratios must be provided.

**Placer County Response: Running slope of ramp as a ratio is 1/8.6. Cross slope measured is 1/50.**

**Updated Placer County Response – 6/30/22: *The running slope of ramp run that was indicated as 11.6 percent, was in error. Based upon field observations, using a zeroed and balanced smart level, the slopes of the ramp do not exceed 1:12 or 8.33%. See attachments 29.1-29.4.***

- d. The width of the top landing of ramp is too narrow at 52 inches.

**Placer County Response: The Corrections for accessibility at the existing ramp condition will be addressed by the relocation of CalFresh/CalWORKs into a new Health Human Services Center (HHSC) Building. The County is under contract to construct a new 90-million-dollar HHSC, construction is scheduled to begin February 2022, and building opening in October 2023. The current location will be abandoned. All funding is going towards accessibility compliance at this new location. County will continue to monitor this item(s) as an accessibility item between the date of this response and the completion of the new HHSC.**

**Updated Placer County Response:** Per CBC1012.6.2 landing width shall not be less than width of widest ramp run. Per CBC1012.6.3, landing to be 60" minimum in length. Existing is 9' in length with no interference with doors in their open position, thus landing is compliant, no further action. (Refer to Attachment 18). No further action required.

**Updated Placer County Response – 6/30/22:** *The County is now using CA T24 11B-405.7.2.1 as reference to answer this item. There is a 60"x60" clear landing at the top of the ramp. The adjacent main entry door exiting the building, fully open, does not impede within the 60"x60" clear landing. See attachment 18.*

## 5. Building Entrance

- a. The force required to open sole public entrance door is too great at 9 pounds.

**Placer County Response:** Adjust pull weight at door to be compliant.

**Updated Placer County Response:** Work orders have been submitted, expected completion date is 2/28/2022.

**Updated Placer County Response:** Adjust pull weight at door to be compliant. (If hardware cannot be adjusted appropriately due to age, new hardware/closer will be ordered which may push 3/31/22 date further out). Completion date is 3/31/22 (see modified response to item a)(Attachment 8).

- b. There is no ISA sign marking this sole public entrance at this facility.

**Placer County Response:** ISA sign/symbol to be provided.

**Updated Placer County Response:** Completion Date 3/31/2022.

## 6. Lobby

- a. The PUB 13 is reportedly available in English and Spanish (8/16), but no mention is made of any other CDSS-translated versions. Additionally, the PUB 13 is reportedly available in braille and audio recording formats, but no language or version information is provided, and there is no reference to the availability of large print versions.

**Placer County Response:** See response to item 2 on page one.

## 7. Restrooms

- a. The force required to open door to accessible Restroom 1 is too great at 9 pounds.

- b. The force required to open door to accessible Restroom 2 is too great at 10 pounds.

**Placer County Response: Adjust pull weight at doors to be compliant.**

**Updated Placer County Response: Work orders have been submitted, expected completion date is 2/28/2022.**

**Updated Placer County Response: Adjust pull weight at doors to be compliant (If hardware cannot be adjusted appropriately due to age, new hardware/closer will be ordered which may push 3/31/22 date further out)(Refer to Attachments 1.3, 1.4, 8). Completions date 3/31/22 (see modified response to item a).**

- c. The depth of knee clearance at 9 inches high off the finish floor under the sink in Restrooms 1 and 2 is insufficient.

**Placer County Response: The corrections for accessibility for items b and c will be addressed by the relocation of CalFresh/CalWORKs into a new Health Human Services Center (HHSC) Building. The County is under contract to construct a new 90-million-dollar HHSC, construction is scheduled to begin February 2022, and building opening in October 2023. The current location will be abandoned. All funding is going towards accessibility compliance at this new location. County will continue to monitor this item(s) as an accessibility item between the date of this response and the completion of the new HHSC.**

**Updated Placer County Response: Knee clearance at Restroom 1 (Men) is not compliant as there is interference with drainage piping. Refer to Attachment 19.1 for depiction relative to CBC11B-306.3 requirement. Piping will be reconfigured to accommodate knee space requirements. Restroom 2 (Women) upon further investigation is compliant with minor repositioning of insulated wrap around piping. Refer to Attachment 19.2. Expected completion date is 9/30/22.**

**Updated Placer County Update - 11/30/22: Work to make corrections has begun and is anticipated to be completed by 12/2/22.**

- d. Distance of toilet to side wall or partition in Restrooms 1 and 2 measured from centerline of toilet to side wall or partition is too great at 18 ¼ inches.

**Placer County Response: See response to item b.**

**Updated Placer County Response: Grab bar(s) will be removed, additional water-resistant material/finish will be added to existing wall to build up depth and to decrease distance from wall to be within the 17"-18" acceptable range per CBC11B-604.2. Expected completion date 9/30/22.**

**Updated Placer County Update - 11/30/22: Work to make corrections was completed on 3/31/22.**

- e. Operable parts of soap dispenser in Restroom 2 are too high at 42 inches measured from the finish floor.

**Placer County Response: Soap dispenser will be removed and re-installed to be compliant height.**

**Updated Placer County Response: Soap dispenser will be removed and re-installed to compliant height.(Refer to Attachment 1.5, 10). Completion date 3/31/22.**

- f. The County provided a measurement for another accessory in Restroom 2, but the accessory is not identified. The County shall, as part of the CAP, identify the accessory, determine whether it meets applicable height requirements, address any identified noncompliance, and explain the results of these steps.

**Placer County Response This accessory is a fold down baby changing table. Height to top of surface is 30" above finish floor. Accessory will be raised to a compliant height of 34".**

**Updated Placer County Response: This accessory is a fold down baby changing table. Height to top of surface is 30" above finish floor, and 28" to bottom of surface. Allowed range of height to top of surface is 27"min for knee clearance and 34"max. to top surface. No action needed; this accessory is compliant.**

## **8. Stairs and Elevators**

- a. Contrasting stripes on treads and upper approach of exterior stairway are too narrow at 1 inch wide.



**Placer County Response: Replace/repaint contrasting stripes on treads at stairway 4 to be compliant width.**

**Updated Placer County Response: Completion date 3/31/22.**

- b. Height of top gripping surface of handrails measured vertically above the walking and stair surface is too low at 33 inches.

**Placer County Response: The corrections for accessibility for handrail height at the existing stair will be addressed by the relocation of CalFresh/CalWORKs into a new Health Human Services Center (HHSC) Building. The County is under contract to construct a new HHSC, construction is scheduled to begin February 2022, and building opening in October 2023. The current location will be abandoned. All funding is going towards accessibility compliance at this new location. County will continue to monitor this item(s) as an accessibility item between the date of this response and the completion of the new HHSC.**

**Updated Placer County Response: Handrails will be modified or removed and be reinstalled to be at compliant height, with compliant diameter and extensions. Expected complete date is 9/30/22.**

**Updated Placer County Update - 11/30/22: Work to make corrections has begun and is anticipated to be completed by 12/2/22.**

*Facility Location: Dewitt (PCGC) IHSS Office Facilities*

## **9. Parking and Route to Main Door**

- a. The County did not provide specific and responsive information regarding the total number of parking spaces reserved for or used by County staff and members of the public visiting this location. Identify the total number of spaces, determine whether the number of accessible spaces is compliant according to the regulations below, and provide an explanation of the results of these steps.

**Placer County Response: The gross floor area of Building 110 (IHSS) is approximately 8700sf. Placer County Zoning Ordinance requires 4 stalls per 1000 sf for this type of use which equates to 35 total required parking stalls. Table 11B of the 2019 California Building Code requires 2 stalls to be accessible, one of which to be van accessible. A van accessible and standard accessible stall each, is provided in front of the main entry to the building, thus meeting the requirements.**



- b. Required signage is missing.

**Placer County Response: Required signage will be provided/installed.**

**Updated Placer County Response: Completion date 3/31/22.**

- c. Information was not provided by the County regarding the area in square inches of the parking stall signs identifying Parking Spaces 1 and 2 as accessible. The County shall, as part of the CAP, provide the missing information, assess compliance with the regulations below, and provide an explanation of the results of these steps.

**Placer County Response: The required square inches per sign for parking spaces 1 and 2 is not compliant and a new signage(s) will be provided.**

**Updated Placer County Response: Initial answer was wrong. Signs are required to be 70 sq inches. Each sign is 12"x18" = 216 sq inches. Compliant, no further action required.**

- d. The County did not provide clear information about van accessible spaces and access aisles. Information provided on worksheets given to the County for reporting and in accompanying photos was internally inconsistent. As a result, Auditors are unable to confirm the width of the access aisle or assess compliance. The County shall, as part of the CAP, provide the correct information, assess compliance with the regulations below, and provide an explanation of the results of these steps.

**Placer County Response The county believes the documentation previously submitted that answered questions for 'PARKING AND ROUTE TO MAIN DOOR', identified the necessary dimensions for the van accessible spaces and aisles, and request that the provided information be re-examined by the reviewer.**

**Updated Placer County Response: Per meeting with State Auditor on 2/16/22, this item has been clarified, no further input is required.**

- e. The County did not provide clear information about shared access aisles. Information provided on worksheets given to the County for reporting and in accompanying photos was internally inconsistent. As a result, Auditors are unable to assess compliance. The County shall, as part of the CAP, provide the correct information, assess compliance with the regulations below, and provide an explanation of the results of these steps.

**Placer County Response: The county believes the documentation submitted, (completed sheets and photo's) satisfies the requirements for this item and request that the provided information be re-examined by the reviewer.**



**Updated Placer County Response:** Per meeting with State Auditor on 2/16/22, this item has been clarified, no further input is required. When looking at the 2 accessible stall configurations in the plan view, the van stall is on the left side, a standard accessible stall is on the right, with a wide 20 ft + cross hatched access aisle between.

- f. Access aisle surfaces are missing painted words "NO PARKING." There is no blue border painted around the access aisle perimeter. The hatched lines painted within the access aisle borderlines are too far apart at greater than 36 inches apart.

**Placer County Response:** Access aisle to be restriped with the words 'NO PARKING', the border will be painted blue at the perimeter, and diagonals spacing corrected to be 36"

**Updated Placer County Response:** Completion date 3/31/22. Refer to Attachment 14, 3, 4, 5.

- g. The County did not provide clear information about the path of travel between accessible parking spaces and the ramp and gated entry to the Welcome Center. As a result, Auditors are unable to assess compliance. The County shall, as part of the CAP, provide the correct information, assess compliance with the regulations below, and provide an explanation of the results of these steps.

**Placer County Response:** The entry to the Welcome Center is through the main entry into Building 110. The ramp that is referenced is not the main entrance into the Welcome Center. The gate referenced is to a private secured outdoor space and not used by the public. The accessible parking spaces for the Welcome Center are within the parking area west and south of Building 110.

- h. Wheel stops are not provided where necessary to prevent encroachment of vehicles over the required accessible path of travel to the accessible entrance.

**Placer County Response:** Wheel stops will be added.

**Updated Placer County Response:** Wheel stops already exist at both stalls to prevent vehicular encroachment. (Refer to attachment 20.). Compliant, no further action required.

- i. Noncompliant changes in level are present between ¼ inch and ½ inch without edge treatment (beveling).



**Placer County Response:** The corrections for accessibility for non-compliant changes in level along the path of travel will be addressed by the relocation of IHSS into a new Health Human Services Center (HHSC) Building. The County is under contract to construct a new HHSC, construction is scheduled to begin February 2022, and building opening in October 2023. The current location will be abandoned. All funding is going towards accessibility compliance at this new location. County will continue to monitor this item(s) as an accessibility item between the date of this response and the completion of the new HHSC.

**Updated Placer County Response:** Beveling will be added to non-compliant locations either by grinding down concrete, or reshaping of wood, as occurs. Where required, adding additional walking surface material such as ac paving will be used if needed. Expected completion date is 9/30/22.

**Updated Placer County Response – 11/30/2022:** See answer to item 9p.

- j. The County identified the number of stairways on the accessible route as zero. However, photos and other information provided identify the presence of "IHSS STAIR 1" on the accessible route. The County shall, as part of the CAP, provide the correct information.

**Placer County Response:** The answer to this question was in error. There is a single ramp adjacent to a stair at the main entry into Building 110. See answer to question 13, and previously provided documentation.

- k. The County did not provide the clear width of the stairway measured between handrails. The County shall, as part of the CAP, provide the correct information, assess compliance with the regulations below, and provide an explanation of the results of these steps.

**Placer County Response:** The stair at the main entry has one straight side and one splayed side. There are handrails on each side of the stair with a single intermediate handrail. At the top of the stair, the clear distance between the side handrail and the intermediate rail is 6'-8 ½" and 17'-6 ½" respectively. The distance at the bottom of the stair between the side handrails and the intermediate rail is 9'-4 ½" and 7'-6 ½" respectively. The corrections for accessibility to the stair will be addressed by the relocation of IHSS into a new Health Human Services Center (HHSC) Building. The County is under contract to construct a new 90-million-dollar HHSC, construction is scheduled to begin February 2022, and building opening in October 2023. The current location will be abandoned. All funding is going towards accessibility compliance at this new location. County will continue



to monitor this item(s) as an accessibility item between the date of this response and the completion of the new HHSC.

**Updated Placer County Response:** The stair at the main entry has one straight side and one splayed side. There are handrails on each side of the stair with a single intermediate handrail. At the top of the stair, the clear distance between the side handrail and the intermediate rail is 6'-8 1/2" and 17'-6 1/2" respectively. The distance at the bottom of the stair between the side handrails and the intermediate rail is 9'-4 1/2" and 7'-6 1/2" respectively. Upon further measurements/verification taken in the field, both handrails at the sides of the stair and the intermediate handrail are not compliant relative to height to surface below, continuity of height, and extensions of railing. New handrail will be fabricated and installed. Expected completion date is 9/30/22.

**Updated Placer County Response – 11/30/2022:** See answer to item 9p.

- I. The County did not provide the width of the contrasting stripes on the treads and upper approach of the stairway on the accessible route. However, a measurement was provided for the exterior stairway for this location, which complies with regulations. The County shall, as part of the CAP, provide the correct information, assess compliance with the regulations below, and provide an explanation of the results of these steps.

**Placer County Response:** There are contrasting stripes. Black stripe against gray stair color. Stripe is 4" wide. New 2" wide stripe, contrasting in color, will be applied.

**Updated Placer County Response:** Completion date 3/31/22. Refer to Attachment 15 and 9.

- m. The County provided information regarding the ramp running slope that is nonresponsive in that it solely refers to and relies upon a report previously generated by a different agency. Facilities features change and weather conditions wear on some features; therefore, it is important that compliance is assessed as part of this Review. In addition, the County did not provide the cross slope of the ramp. The County shall, as part of the CAP, provide the correct information, assess compliance with the regulations below, and provide an explanation of the results of these steps.

**Placer County Response:** Based upon current field observations, the ramp has the following slopes;-upper run in direction of travel ranging from 6.9%+- to 8.2%+- (1/14.4 +-to 1/12.1+-)-lower run in direction of travel from 8.6%+- to 7.4%+- (1/11.5 +-to 1/13.5 +-)-cross slope does not exceed .3% The corrections for accessibility for the existing ramp for items m, n, o, p, and q will be



addressed by the relocation of IHSS into a new Health Human Services Center (HHSC) Building. The County is under contract to construct a new 90-million-dollar HHSC, construction is scheduled to begin February 2022, and building opening in October 2023. The current location will be abandoned. All funding is going towards accessibility compliance at this new location.

County will continue to monitor this item(s) as an accessibility item between the date of this response and the completion of the new HHSC.

**Updated Placer County Response:** Based upon current field observations, the ramp has the following slopes; -upper run indirection of travel ranging from 6.9% +-to 8.2% +-(1/14.4 +-to 1/12.1 +-)-lower run in direction of travel from 8.6% +-to 7.4% +-(1/11.5 +-to 1/13.5 +-)-cross slope does not exceed .3%For the portion of the ramp that is 8.6% +-, the ramp surface (concrete) will be ground down to adjust by .3% with goal to make compliant at 8.3%. Expected completion date is 9/30/22.

**Updated Placer County Response – 11/30/2022:** See answer to item 9p.

- n. There is a change in level between ¼ inch and ½ inch without edge treatment (beveling) at one or both ends of the ramp.

**Placer County Response:** See response to item m.

**Updated Placer County Response:** Beveling will be added to non-compliant locations either by grinding down concrete, or reshaping of wood, as occurs. Where required, adding additional walking surface material such as ac paving will be used if needed. Expected completion date is 9/30/22.

**Updated Placer County Response – 11/30/2022:** See answer to item 9p.

- o. The width of the top landing is too short at 54 ½ inches. The width of each landing is not as wide as the widest ramp run leading to the landing.

**Placer County Response:** See response to item m.

**Updated Placer County Response:** Per CBC 1012.5.1 “Width and Capacity of Ramps”, the clear width required for a ramp between handrails is 36” minimum. The width of the ramp varies form 54 ½” to 60” in width. Per CBC1012.6.2 the width shall not be less than the widest ramp run. The 54 ½” width exceeds the 36” allowed minimum and is sufficient for exiting width from the building. County proposes the 54 ½” dimension will be maintained and be consistent the along entire length of ramp which meets requirements of CBC 1012.5.1 and 1012.6.2. Handrails on each of the ramp will be refabricated and installed to meet compliant height from surface below, extensions at top and bottom, and maintain the 54 ½” dimension. (Refer to Attachments 23, 24, 25, 26). Expected completion date is 9/30/22.



**Updated Placer County Response – 6/30/22:** *We believe ‘Item 9p’ was incorrectly referenced as items from County’s original response referencing CBC 1012.6.2 and 1012.5.1 was for “Item 9o”. The County is now using CA T24 11B-405.7.2.1 as reference to answer this item. The County will reconstruct a portion of the ramp to meet the requirements for primary slope, cross slope, handrails, and landings at the top and bottom of the ramp runs. See Attachment 23.*

*Due to the complexity and level of involvement, the County may need to seek professional design services to have plans prepared, plan checked and permitted. The plans would then be used to procure a contractor for construction services. It is anticipated that the total duration of time to do this would take through January 30th, 2023.*

**Updated Placer County Response – 11/30/2022:** After further investigation into non-compliant items related to the exiting ramp, the efforts to make corrections to address individual items (handrails, slope, width etc.) will cause a ripple effect to those features of the ramp that are currently compliant. The sum-total amount of work would require an almost complete demolition and rebuild of the ramp. This would leave the main access into the building without a ramp system at all for public use.

The County has solicited bids to purchase a modular ramp system which will come fully compliant for slope, handrails, extensions, landings, etc. Some work to place the ramp within adjacent landscaping, as well as paving work at the bottom of the ramp for a compliant landing will be required. The purchase, installation as well as on site paving work is anticipated to be complete by the end January 2023. During construction the exiting ramp will remain open for use and will not be affected. The exiting ramp will be closed off, and abandoned in place when the new ramp is brought on-line. Refer to attachment “IHSS Office - Proposed Ramp”.

- p. Ramp handrails lack extensions beyond the top and bottom landing of the ramp.

**Placer County Response:** See response to item m.

**Updated Placer County Response:** New handrails will be fabricated and installed to have compliant extensions. Expected completion date is 9/30/22.

**Updated Placer County Response – 11/30/2022:** Due to the complexity and level of involvement, the County may need to seek professional design services to have plans prepared, plan checked and permitted. The plans would then be used to procure a contractor for construction services. It is anticipated that the total duration of time to do this would take through January 30th, 2023.

- q. The height of ramp handrails is too short at 32 ½ inches. The height of stairs too short at 33 inches.

**Updated Placer County Response:** Work orders have been submitted, expected completion date is 2/28/2022.



**Updated Placer County Response: Building Maintenance or vendor will adjust the pressure of the automatic door opener. (If hardware cannot be adjusted appropriately due to age, new hardware/closer will be ordered which may push 3/31/22 date further out)(Attachment 8). Completion date 3/31/22 (see modified response to item a).**

**Updated Placer County Response – 11/30/2022: See answer to item 9p.**

## **10. Building Entrances**

- a. The force required to open the sole public entrance doors is too great at 7pounds. The presence of HI-LO Automatic door openers does not relieve the County of the obligation to maintain the required door pressure level.

**Placer County Response: Building Maintenance or vendor will adjust the pressure of the automatic door openers.**

**Updated Placer County Response: Work orders have been submitted, expected completion date is 2/28/2022.**

**Updated Placer County Response: Building Maintenance or vendor will adjust the pressure of the automatic door opener. (If hardware cannot be adjusted appropriately due to age, new hardware/closer will be ordered which may push 3/31/22 date further out) (Attachment 8). Completion date 3/31/22 (see modified response to item a).**

- b. The public entrance door handle hardware requires tight grasping, pinching, or twisting of the wrist to open. The presence of HI-LO Automatic door openers does not relieve the County of its obligation to have compliant door handle hardware.

**Placer County Response: The corrections for accessibility to the entrance door hardware will be addressed by the relocation of IHSS into a new Health Human Services Center (HHSC) Building. The County is under contract to construct a new 90-million-dollar HHSC, construction is scheduled to begin February 2022, and building opening in October 2023. The current location will be abandoned. All funding is going towards accessibility compliance at this new location. County will continue to monitor this item(s) as an accessibility item between the date of this response and the completion of the new HHSC.**

**Updated Placer County Response: Compliant hardware will be installed. Expected completion date is 9/30/22.**

**Updated Placer County Response – 12/29/2022: Compliant hardware has been installed.**

## 11. Lobby

- a. Depth of knee clearance beneath the counter is insufficient at nine 9 inches high and at 27 inches high measured from the finish floor.

**Placer County Response:** The corrections for accessibility to required knee clearance will be addressed by the installation of new counters within the relocation of IHSS into a new Health Human Services Center (HHSC) Building the County is under contract to construct a new 90-million-dollar HHSC, construction is scheduled to begin February 2022, and building opening in October 2023. The current location will be abandoned. All funding is going towards accessibility compliance at this new location. County will continue to monitor this item(s) as an accessibility item between the date of this response and the completion of the new HHSC. County will continue to monitor this item(s) as an accessibility item between the date of this response and the completion of the new HHSC.

**Updated Placer County Response:** After follow-up observations on site based upon as-built conditions, a correction is needed to the first response to the

State on the Civil Rights Compliance Review, Placer County HHS (April 2021) Dewitt Bldg. 110A Worksheet 3 "Lobby". For Accessible Counters Item 11, there is no counter available for use by the public that is 36" long min and 34" high max. Currently the only counter in the lobby is a 42" +/-, which is too high for transaction.

As a solution, the County is proposing that furniture be placed in the lobby designated for transactions with the public in need, that will have the compliant height, width, toe and knee space, approach clearance and appropriate ISA. (Refer to Attachment 21.) Pending State Review.

**Updated Placer County Response – 6/30/22:** There was confusion on these items that was just noted when working to provide this response. We are on track however, we were aiming for a 9/30/2022 completion date thinking the due date was the same as the item for the lobby at Enterprise. As it stands now, we still have a bit coordination to do with staff we believe can be done within the next few weeks.

**Updated Placer County Response – 12/29/2022:** This item is completed.



## 12. Interview Rooms

- a. Interview Room 1 lacks circular turning space with a 5-foot diameter. The County did not provide clear information regarding dimensions available for a turning space and/or whether these dimensions meet the alternative requirements for T-Shaped turning space. The County shall, as part of the CAP, provide the correct information, assess compliance with the regulations below, and provide an explanation of the results of these steps.

**Placer County Response:** Neither a 60” diameter circle or T-shaped turning space can be accommodated, considering furniture as the room is 8’x8’ in size. The corrections for accessibility to accommodate turning space will be addressed within new interview rooms provided as part of the relocation of IHSS into a new Health Human Services Center (HHSC) Building. The County is under contract to construct a new 90-million-dollar HHSC, construction is scheduled to begin February 2022, and building opening in October 2023. The current location will be abandoned. All funding is going towards accessibility compliance at this new location. County will continue to monitor this item(s) as an accessibility item between the date of this response and the completion of the new HHSC.

**Updated Placer County Response:** Neither a 60” diameter circle or T-shaped turning space can be accommodated, considering furniture as the room is 8’x8’ in size. As a solution, the County is proposing if the need arises on a case-by-case basis, that customers be escorted to a large conference room that has ample space for movement. The County will provide a designated table of compliant height, width, toe and knee space, approach clearance and appropriate ISA for those in need to use. (Refer to Attachment 22). Pending State review.



**Updated Placer County Response 7/31/2022:** There was confusion on these items that was just noted when working to provide this response. We are on track however, we were aiming for a 9/30/2022 completion date thinking the due date was the same as the item for the lobby at Enterprise. As it stands now, we still have a bit coordination to do with staff we believe can be done within the next few weeks.

**Updated Placer County Response 11/30/2022:** This item is complete.

- b. The County did not provide clear information regarding seating at a table, desk, or counter (i.e., “knee clearance is 0 inches wide and 0 inches deep at 27 inches high off the finish floor, and a writing surface would need to be provided”). The County shall, as part of the CAP, provide the correct information, assess compliance with the regulations below, and provide an explanation of the results of these steps.

**Placer County Response:** Knee clearance at the furniture locations is not compliant as they do not have 27” clearance. The corrections to accommodate clearances will be addressed within new interview rooms provided as part of the relocation of IHSS into a new Health Human Services Center (HHSC) Building. The County is under contract to construct a new 90-million-dollar HHSC, construction is scheduled to begin February 2022, and building opening in October 2023. The current location will be abandoned. All funding is going towards accessibility compliance at this new location. County will continue to monitor this item(s) as an accessibility item between the date of this response and the completion of the new HHSC.

**Updated Placer County Response:** Knee clearance at the furniture locations are not compliant as they do not have 27” clearance. Refer to answer to (a.) above. Furniture in the new location (conference room) will be compliant in height and clearance. Pending State review.

**Updated Placer County Response 11/30/2022:** This item is complete.

### 13. Restrooms

- a. The force required to open the door of Restroom 1 is too great at 6 to 9 pounds.

**Placer County Response: Building Maintenance will adjust pull weight of door.**

**Updated Placer County Response: Work orders have been submitted, expected completion date is 2/28/2022.**

**Updated Placer County Response: Building Maintenance will adjust pull weight of door. (If hardware cannot be adjusted appropriately due to age, new hardware/closer will be ordered which may push 3/31/22 date further out)(Attachment 1.3, 1.4, 8). Expected completion date 3/31/22 (see modified response to item a.**

**Updated Placer County Response – 11/30/22: This item is complete.**

- b. In Restroom 1, the operable parts of the soap dispenser and towel dispenser are both too high from the finish floor at 43 ¾ and 40 ½ inches, respectively. In Restroom 2, the operable parts of the soap dispenser are too high at 46 inches from the finish floor.

**Placer County Response: Soap dispensers will be removed and re-installed to adjust height.**

**Updated Placer County Response: Completion date 3/31/22 (Attachment 10).**

**Updated Placer County Response – 11/30/2022: This item is complete.**

- c. The distance of the toilet to side wall or partition measured from centerline of toilet to side wall or partition is too great at 19 ½ inches in Restroom 1 and 20 ½ inches in Restroom 2.

**Placer County Response: The corrections for accessibility to meet required dimensions to centerline of toilets from walls or partitions, will be addressed within the new restrooms provided as part of the relocation of IHSS into a new Health Human Services Center (HHSC) Building. The County is under contract to construct a new 90-million-dollar HHSC, construction is scheduled to begin February 2022, and building opening in October 2023. The current location will be abandoned. All funding is going towards accessibility compliance at this new location. County will continue to monitor this item(s) as an accessibility item between the date of this response and the completion of the new HHSC.**

**Updated Placer County Response: Grab bar(s) will be removed, additional**



**sub-material and water-resistant finish will be added to existing wall to build up depth and to decrease distance from wall to be within the 17"-18" acceptable range per CBC11B-604.2. Expected completion date 9/30/22.**

**Updated Placer County Response – 11/30/2022: This item is complete.**

- d. The distance from the front edge of the toilet-to-toilet paper dispenser measured from centerline of toilet paper dispenser is too great at 15 inches in Restroom 1 and 13 inches in Restroom 2.

**Placer County Response: Toilet paper dispensers to be relocated.**

**Updated Placer County Response: Completion date 3/31/22 (Attachment 16).**

- e. In Restroom 2, exposed pipes under the sink lack sufficient insulation to protect against contact due to a missing portion of the drainpipe and cold-water supply wrap.

**Placer County Response: Insulation will be added to exposed piping.**

**Updated Placer County Response: Completion date 3/31/22 (Attachment 17).**

*Facility Location: Enterprise Office*

The facilities located at this location, Enterprise Office 11716 Enterprise Drive in Auburn CA, are leased and not owned by the County. The corrections for most non-compliant accessibility items will be addressed as part of the relocation of this department into a new Health Human Services Center (HHSC) Building. The County is under contract to construct a new 90-million-dollar HHSC, construction is scheduled to begin February 2022, and building opening in October 2023. The current location will upon completion of the new building be vacated. All funding is going towards accessibility compliance at this new location.

**14. Parking and Route to Main Door**

- a. The shared access aisle for accessible parking spaces 1 and 2 is marked with an International Symbol of Accessibility (ISA); however, the ISA is faded and requires repainting. The words "NO PARKING" painted on the access aisle for parking space 3 is also faded and requires repainting.

**Placer County Response: Access aisle to be restriped with the words 'NO PARKING', ISA will be repainted.**

**Updated Placer County Response: The owner/landlord has hired a consultant to prepare plans to make accessibility corrections to the site and building entry. Completion date is approximately July 2022.**



**Updated Placer County Response – 6/30/2022:** Our Real Estate Services Division reached out to the owners representative for an update. The representative informs us he has received only 1 bid for the parking and path of travel work (parking, ramp, railing etc.) and are trying to obtain 3 bids. The bid climate is very tough currently and he is having trouble attaining bids from qualified contractors. We have asked that he get back to us on when he anticipates obtaining additional bids. We hope to learn more on 8/1.

**Updated Placer County Response – 11/30/2022:** This item has been corrected by the landlord using their own independent Casp Consultant and Contractor.

- b. Accessible parking spaces could be located on a shorter accessible route from parking to the one accessible facility entrance.

**Placer County Response:** Accessible parking will remain in current locations as corrections will be addressed at new accessible parking locations close to the main building entrance at a new Health Human Services Center (HHSC) Building. The County is under contract to construct a new 90-million-dollar HHSC, construction is scheduled to begin February 2022, and building opening in October 2023 at which time the County will move out of the building. All funding is going towards accessibility compliance at this new location. County will continue to monitor this item(s) as an accessibility item between the date of this response and the completion of the new HHSC.

**Updated Placer County Response:** As part of the owner/landlords plans to make accessibility corrections to the site and building entry, the accessible stalls in questions will be removed/relocated. See answer to a. Completion date is approximately July 2022.

**Updated Placer County Response – 11/30/2022:** This item has been corrected by the landlord using their own independent Casp Consultant and Contractor.



- c. The County did not provide clear information regarding directional signage at decision points along the accessible route. The County shall, as part of the CAP, provide the correct information, assess compliance with the regulations below, and provide an explanation of the results of these steps.

**Placer County Response: Evaluation and corrections to clear direction signage along path of travel to building entrance will be addressed at a new Health Human Services Center (HHSC) Building. The County is under contract to construct a new 90-million-dollar HHSC, construction is scheduled to begin February 2022, and building opening in October 2023 at which time the County will move out of the building. All funding is going towards accessibility compliance at this new location. County will continue to monitor this item(s) as an accessibility item between the date of this response and the completion of the new HHSC.**

**Updated Placer County Response: As part of the owner/landlords plans to make accessibility corrections to the site and building entry, the accessible stalls in questions will be removed/relocated. See answer to a. Completion date is approximately July 2022.**

**Updated Placer County Response – 11/30/2022: This item has been corrected by the landlord using their own independent Casp Consultant and Contractor.**

## 15. Building Entrances

- a. The force required to open sole public entrance door is too great at 12pounds.

**Placer County Response: Building Maintenance will work with owner to adjust pull weight of door.**

**Updated Placer County Response: The owner/landlord has hired a consultant to prepare plans to make accessibility corrections to the building entry door and hardware. Pull weight will be adjusted to be compliant at 5 lbs. Completion date is approximately July 2022.**

**Updated Placer County Response – 6/30/22: Our Real Estate Services Division reached out to the owners representative for an update. The representative informs us he has received only 1 bid for the parking and path of travel work (parking, ramp, railing etc.) and are trying to obtain 3 bids. The bid climate is very tough currently and he is having trouble**



attaining bids from qualified contractors. We have asked that he get back to us on when he anticipates obtaining additional bids. We hope to learn more on 8/1.

**Updated Placer County Response – 11/30/2022:** This item has been corrected by the landlord using their own independent Casp Consultant and Contractor.

- b. Public entrance doors are noncompliant in that tight grasping, pinching, or twisting of the wrist is required to open them

**Placer County Response:** The corrections for accessibility to the entrance door hardware will be addressed by the relocation of this department into a new Health Human Services Center (HHSC) Building. The County is under contract to construct a new 90-million-dollar HHSC, construction is scheduled to begin February 2022, and building opening in October 2023 at which time the County will move out of the building. All funding is going towards accessibility compliance at this new location. County will continue to monitor this item(s) as an accessibility item between the date of this response and the completion of the new HHSC.

**Updated Placer County Response:** The owner/landlord has hired a consultant to prepare plans to make accessibility corrections to the building entry door and hardware. New hardware will be installed to address grasping, pinching or twisting of the wrist. Completion date is approximately July 2022.

**Updated Placer County Response – 11/30/2022:** This item has been corrected by the landlord using their own independent Casp Consultant and Contractor.

## 16. Lobby

- a. Depth of knee clearance beneath counter is insufficient at a height of 9 inches above the finish floor.

**Placer County Response:** The corrections for accessibility to counter and knee clearances will be addressed by the relocation of this department into a new Health Human Services Center (HHSC) Building. The County is under contract to construct a new 90-million-dollar HHSC, construction is scheduled to begin February 2022, and building opening in October 2023 at which time the County will move out of the building. All funding is going towards accessibility compliance at this new location. County will continue to monitor this item(s) as an accessibility item between the date of this response and the completion of the new HHSC.

**Updated Placer County Response:** As a solution, the County is proposing that furniture be placed in the lobby designated for transactions with the public in need, that will have the compliant height, width, toe and knee space, approach clearance and appropriate ISA. (Refer to Attachment 27.). Expected completion date 9/30/22.

**Updated Placer County Response – 11/30/2022:** This item is complete.

## 17. Emergency Alarm

- a. The County did not provide clear information regarding whether audible emergency alarms are present and if so, whether they can be heard in the lobby. The County shall, as part of the CAP, provide the correct information, assess compliance with the regulations below, and provide an explanation of the results of these steps.

**Placer County Response:** The corrections for audible emergency alarms will be addressed by the relocation of this department into a new Health Human Services Center (HHSC) Building. The County is under contract to construct a new 90-million-dollar HHSC, construction is scheduled to begin February 2022, and building opening in October 2023 at which time the County will move out of the building. All funding is going towards accessibility compliance at this new location.



**Updated Placer County Response: Audible alarm exists, can be heard in main lobby, and has passed inspection by Auburn Fire Department on 11/2/20. Item resolved.**

#### **18. Restrooms**

- a. The force required to open the doors to Restrooms 1 and 2 is too great at 10 pounds and 9 pounds, respectively.

**Placer County Response: Building Maintenance will work with owner to adjust pull weight of door.**

**Updated Placer County Response: Door opening force will be adjusted to be compliant (If hardware cannot be adjusted appropriately due to age, new hardware/closer will be ordered) (Refer to Attachment 8). Expected completed date 9/30/22.**

**Updated Placer County Response – 11/30/2022: This will be completed with other related work to the Restroom, refer to answer to Item 18b.**

- b. The dimensions of the clear ground space in front of the sink in Restroom 1 are inadequate at 36 inches by 40 inches.

**Placer County Response: Funding is going towards accessibility compliance at this new location. County will continue to monitor this item(s) as an accessibility item between the date of this response and the completion of the new HHSC.**

**Updated Placer County Response: Refer to Attachments 28.1 and 28.2. To provide accessible Restroom facility to both Men and Women, County proposes to convert existing Men's Restroom #1 to an accessible single accommodation restroom. Urinal will be removed completely, existing lavatory will be relocated to current urinal location to eliminate encroachment of required 30"x48" clearance with entry door, soap paper towel dispensers will be relocated to have compliant heights and clearances, new code compliant door signage will be added. Expected completion date 9/30/22.**

**Updated Placer County Response – 11/30/2022: The attached exhibit "Enterprise Accessibility Restroom Upgrades" was prepared by the County for review by the owner prior to starting construction work to address this Item 18b. The owner has since requested that the County leave the urinal in**



place, and that the County needs to consider an alternate plan to address non-compliance. Their suggestion requires more significant work for demolition, construction, electrical, and permitting leading to longer schedule and more cost. As of November 30<sup>th</sup>, the County is trying to arrange a meeting with the owner during the week of December 5<sup>th</sup>, to further the discussion and to again present the County's solution as being the most cost effective and expedient method to address non-compliance. The County will not have a more definitively timeline until after this meeting at which time the State can be updated.

- c. In Restrooms 1 and 2, the depth and the width of knee clearance under the sink are insufficient.

**Placer County Response: See answer to item b.**

**Updated Placer County Response: Refer to answer for Item C. Expected completion date 9/30/22.**

**Updated Placer County Response – 11/30/2022: Corrections will be made at the same time the other work in the Restroom commences.**

- d. The operable parts of the following Restroom 1 accessories are too high measured from the finish floor: soap dispenser at 41 inches high; toilet protector dispenser at 47 inches high; and light switch at 43 ½ inches high. The operable parts of the following Restroom 2 accessories are too high measured from the finish floor: toilet protector dispenser at 48 inches high; and light switch at 44 inches high.

**Placer County Response: See answer to item b.**

**Updated Placer County Response: Refer to Attachment 28.2. To 'new' single accommodation restroom, additional water-resistant material will be added to adjacent wall to decrease distance from CL of toilet to wall to be 18". Grab bar will be reinstalled with compliant height, distance from front of toilet, etc. Expected completion date 9/30/22.**

**Updated Placer County Response – 11/30/2022: Refer to answer for Item 18b.**

- e. The distance from the toilet to the side wall or partition measured from centerline of toilet to side wall or partition is too great at 18 ½ inches in Restroom 1 and at 22 inches in Restroom 2.

**Placer County Response: See answer to item b.**

**Updated Placer County Response: With removal of existing partition and door and converting to a single accommodation toilet room, clearances will meet requirements of CBC 2019 11B-604.3. Expected completion date 9/30/22.**



**Updated Placer County Response – 11/30/2022: Refer to answer for Item 18b.**

- f. There is insufficient clearance around, and insufficient maneuvering space in front of, the Restroom 1 toilet measured perpendicular from the sidewall.

**Placer County Response: See answer to item b.**

**Updated Placer County Response: With removal of existing partition and door and converting to a single accommodation toilet room, clearances will meet requirements of CBC 2019 11B-604.3. Expected completion date 9/30/22.**

**Updated Placer County Response – 11/30/2022: Refer to answer for Item 18b.**

- g. The front edge of the toilet is too close to the toilet paper dispenser in Restroom 1 at 4 inches and in Restroom 2 at 1 inch, measured from the centerline of the dispenser.

**Placer County Response: See answer to item b.**

**Updated Placer County Response: Toilet paper dispenser will be relocated to be compliant with distance from front edge of toilet (7"-9") and below adjacent grab bar and 19" min. from floor to outlet of dispenser. Expected completion date 9/30/22.**

**Updated Placer County Response – 11/30/2022: Refer to answer for Item 18b.**

- h. Neither dispenser outlet is located below the grab bar, which has a maximum allowable height of 36 inches from the finish floor.

**Placer County Response: See answer to item b.**

**Updated Placer County Response – 11/30/2022: Refer to answer for Item 18b.**

*Facility Location: Tahoe Office*

The facilities at this location, 5225 N Lake Blvd, Carnelian Bay CA, are leased and not owned by the County so answers to correction items are framed within this context. The County is searching for a new alternate and consolidated location that offers compliant accessibility. Corrections to non-compliant accessible items is a high priority for county owned buildings based upon annual budgets and allocations to perform corrections. Note that the public does not have or need access to the second floor of the building and all public contact is provided exclusively on the bottom floor through a single main entrance. The County will coordinate and work with the building owner for corrections to non-compliant items as owners budget allows and at this time can offer the following answers that must be verified with the owner.



## 19. Parking and Route to Main Door

- a. Required signage is missing.

**Placer County Response:** Entry sign stating, "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 owners' expense. Towed vehicles may be reclaimed at/or by telephoning., does not exist has been added to the face of building, at the head of the single accessible stall and adjacent to the parking stall signage. See Attachment T15. Directional arrows combined with international symbol of accessibility signage has been added to the following locations:- Attached to portions of the building adjacent to parking lot drive aisle guiding visitors to the single accessible parking space. See Attachment T65. -Adjacent to loading/unloading area at single accessible stall, on building face building at the bottom of sloped walk guiding to single main entry. See Attachment T59.- From accessible stall, at the top of the sloped walk and adjacent to Northwest (Stair 3) corner stair(guiding to single main entry. See Attachment T11.-Along POT adjacent to Southwest (Stair 2) corner stair guiding to single main entry. See Attachment T36.

- b. There is no parking stall signage identifying the one accessible parking space as accessible.

**Placer County Response:** New parking stall sign to identify the one accessible stall, has been installed on building face at head of stall. Sign is 12"w X 30" = 360 sq in. See Attachments T1 and T15.

- c. The length of the accessible parking space is too short at 14 feet 6 inches.

**Placer County Response:** Stall length has been corrected. See Attachment T1.

- d. The accessible parking space is marked with an ISA; however, this ISA is faded and requires repainting.

**Placer County Response:** New, fresh IDA is painted. See Attachment T1.

- e. The accessible parking space is marked with an ISA; however, this ISA is faded and requires repainting.

**Placer County Response:** New, fresh IDA is painted. See Attachment T1.

- f. The access aisle is too narrow at 47 inches wide.

**Placer County Response:** Accessible aisle has been expanded to be 8' wide x length of stall. See Attachment T1.



- g. The words "NO PARKING" is not painted on the surface of the access aisle.

**Placer County Response:** New, fresh NO PARKING pavement markings have been added to loading/unloading aisle. See Attachment T1.

- h. There is a change in level of greater than ½ inch without a ramp.

**Placer County Response:** Change in levels of ½" or greater have been addressed with new asphalt overlay.

**Updated Placer County Response – 11/30/2022:** *For items 19h-I related to corrective measures to 3 exterior stair locations, the owner of the property is currently in the process of procuring estimates from contractors for evaluation and contractor selection. Contractor selection combined with the limitation of the time of year in which you can build in Tahoe due to winter weather, will place the reconstruction of the stairs to be in Summer 2023.*

- i. The clear width of Stairways 1, 2 and 3 are too narrow at 42 inches, 26 inches, and 44 inches, respectively, measured between handrails.

**Placer County Response:** Refer to Attachment S1 for updated findings based upon current field observations. Stair 2 was mistakenly reported as part of initial response to audit as being 26" width. The correct width is 63". Stairs 1, 2, 3 are non-compliant for a variety of reasons. The County will work with the owner of the property for corrections to the stairs.

**Updated Placer County Response:** The County is working with the owner of the property to determine their ability to participate to make corrections to Items (h thru j). A specific completion date as of 5/16/22 has not been determined.

**Updated Placer County Response – 11/30/2022:** *For items 19h-I related to corrective measures to 3 exterior stair locations, the owner of the property is currently in the process of procuring estimates from contractors for evaluation and contractor selection. Contractor selection combined with the limitation of the time of year in which you can build in Tahoe due to winter weather, will place the reconstruction of the stairs to be in Summer 2023.*

- j. Neither Stairway 1, 2 nor 3 has uniform riser heights, and the highest riser height of Stairways 1 and 2 is too high at 8 inches. The County did not provide information about stairway tread depth. The County shall, as part of the CAP, provide the correct information, assess compliance with the regulations below, and provide an explanation of the results of these steps.

**Placer County Response:** Refer to Attachment S1 for tread depth. The County will work with the owner of the property for corrections to the stairs.



**Updated Placer County Response:** The County is working with the owner of the property to determine their ability to participate to make corrections to Items (h thru j). A specific completion date as of 5/16/22 has not been determined.

**Updated Placer County Response – 11/30/2022:** *For items 19h-I related to corrective measures to 3 exterior stair locations, the owner of the property is currently in the process of procuring estimates from contractors for evaluation and contractor selection. Contractor selection combined with the limitation of the time of year in which you can build in Tahoe due to winter weather, will place the reconstruction of the stairs to be in Summer 2023.*

- k. The County did not provide clear information regarding contrasting stripes on stairways. The County shall, as part of the CAP, provide the correct information, assess compliance with the regulations below, and provide an explanation of the results of these steps.

**Placer County Response:** Contrasting striping at stairs are not compliant for width and placement. The County will install contrasting stripes at the top and bottom tread at each stair run at each stair, to address item.

**Updated Placer County Response:** The County is working with the owner of the property to determine their ability to participate to make corrections to Items (h thru j). A specific completion date as of 5/16/22 has not been determined.

**Updated Placer County Response – 11/30/2022:** *For items 19h-I related to corrective measures to 3 exterior stair locations, the owner of the property is currently in the process of procuring estimates from contractors for evaluation and contractor selection. Contractor selection combined with the limitation of the time of year in which you can build in Tahoe due to winter weather, will place the reconstruction of the stairs to be in Summer 2023.*

- l. The clear width of the ramp is too narrow at 42 inches.

**Placer County Response:** See answer to item h.

**Updated Placer County Response:** See answer to item L.

**Updated Placer County Response – 11/30/2022:** *For items 19h-I related to corrective measures to 3 exterior stair locations, the owner of the property is currently in the process of procuring estimates from contractors for evaluation and contractor selection. Contractor selection combined with the limitation of the time of year in which you can build in Tahoe due to winter weather, will place the reconstruction of the stairs to be in Summer 2023.*

- m. The running and cross slopes of ramp run are presented as whole numbers rather than as ratios. Measurements presented as ratios must be provided to assess compliance.

**Placer County Response: Original reporting to the auditor that this portion of the means of egress is a ramp, was incorrect. The slopes in the direction of travel do not exceed 5% or 1:20, thus classifying this as a sloped walk. Cross slopes do not exceed 2% or 1:50. Refer to Attachment SW1 and SW2.**

- n. The County did not provide information regarding ramp landings. The County shall, as part of the CAP, provide the correct information, assess compliance with the regulations below, and provide an explanation of the results of these steps.

**Placer County Response: See answer to item L. This is not a ramp; this is a sloped walk. The transition at the bottom of the sloped walk within the cross hatched loading/unloading aisle meets requirements of 2% or 1:50 slope.**

- o. The ramp lacks handrails on both sides.

**Placer County Response: See answer to Item L. This is not a ramp; this is a sloped walk.**

- p. The County did not clearly present information requested by Auditors regarding stairways and ramps. Auditors are unable to determine whether responses apply to handrails for all or some stairways and ramps. The County shall, as part of the CAP, provide the correct information, assess compliance with the regulations below, and provide an explanation of the results of these steps.

**Placer County Response: County feels that information for 'stairs and ramps' along with new exhibits as part of this response to the auditor provides the necessary information with answers for corrections, if needed.**

## **20. Building Entrances**

- a. The County did not provide clear information regarding public entrances at this facility, referring to additional entrances identified as "Manager," "Staff," and "Staff Exit". The scope of this Review is limited to entrances that are or may be used by the public, even when such entry is rare. The County shall, as part of the CAP, provide the correct information, assess compliance with the regulations below, and provide an explanation of the results of these steps.

**Placer County Response: Entrance identified as 'Entrance One' within original documents submitted is the only public entrance. Other locations identified as 'Entrance Manager, Staff, Staff Exit' are not public entrances for security reasons. As identified in original documents submitted (Case report, Civil Rights Worksheets/Questions Answers), the door clear width, opening force, height of operable parts and threshold non-beveled height are not compliant. The County will work with the owner to implement corrections to these items.**



**Updated Placer County Response – 11/30/2022:** The County will continue to reach out to the owner of the property to determine their ability and timing to participate in making corrections to outstanding items both internal and external to the building. As of November 30<sup>th</sup>, 2022 and given the time of year for construction, a definitive time for making corrections has not been established.

## **21. Lobby**

- a. The height of the highest copy of the PUB 13 is too high at 67 inches.

**Placer County Response:** PUB height will be corrected to be compliant.

**Updated Placer County Response:** PUB height will be corrected to be compliant height by 7/1/22.

**Updated Placer County Response – 2/1/23:** This item has been corrected.

## **22. Emergency Alarm**

- a. The facility lacks an audible emergency alarm.

**Placer County Response:** The County will work with the owner of the property for corrections to add an audible emergency alarm.

**Updated Placer County Response:** The County will continue to work with the owner of the property to determine their ability to participate in making corrections to add an audible emergency alarm. A specific completion date as of 5/16/22 has not been determined.

**Updated Placer County Response – 6/30/2022:** For item 4a for the emergency alarm, the owner is researching code compliance requirements and scope prior to committing to a date of completion. The owner is striving to have an answer and action plan by August 30<sup>th</sup>, 2022.

**Updated Placer County Response – 11/30/2022:** The County will continue to reach out to the owner of the property to determine their ability and timing to participate in making corrections to outstanding items both internal and external to the building. As of November 30<sup>th</sup>, 2022 and given the time of year for construction, a definitive time for making corrections has not been established.

## 23. Restrooms

- a. Depth of knee clearance at 9 inches high under sink is insufficient at 0 to 6 inches due to the presence of a bucket under the sink. The apron of the sink is too low at 23 ½ inches high, such that there is no knee clearance depth available to measure at 27 inches high under the sink.

**Placer County Response:** The County will work with the owner of the property, to make corrections to knee space clearance requirements, and installing a height appropriate fixture/sink.

**Updated Placer County Response:** The County will work with the owner of the property to determine their ability to participate in making corrections to items within the Restrooms. A specific completion date as of 5/16/22 has not been determined.

**Updated Placer County Response – 6/30/2022:** For items 5a-e related to corrective measures for the restroom, the owner is working to have this completed by September 30<sup>th</sup>, 2022.

**Updated Placer County Response – 11/30/2022:** The County will continue to reach out to the owner of the property to determine their ability and timing to participate in making corrections to outstanding items both internal and external to the building. As of November 30<sup>th</sup>, 2022 and given the time of year for construction, a definitive time for making corrections has not been established.

- b. There are sharp or abrasive surfaces under the sink.

**Placer County Response:** See answer to item a. Sharp or abrasive surfaces will be fixed along with corrections to item a.

**Updated Placer County Response:** The County will work with the owner of the property to determine their ability to participate in making corrections to items within the Restrooms. A specific completion date as of 5/16/22 has not been determined.

**Updated Placer County Response – 6/30/2022:** For items 5a-e related to corrective measures for the restroom, the owner is working to have this completed by September 30<sup>th</sup>, 2022.

**Updated Placer County Response – 11/30/2022:** The County will continue to reach out to the owner of the property to determine their ability and timing to participate in making corrections to outstanding items both internal and external to the building. As of November 30<sup>th</sup>, 2022 and given the time of year for construction, a definitive time for making corrections has not been

**established.**

- c. Operable parts of the soap dispenser and paper towel dispenser are too high at 52 inches and 42 ½ inches, respectively, measured from the finish floor.

**Placer County Response: Corrections will be made by re-installing the soap dispenser and towel dispenser, so their operable parts are to a compliant height.**

**Updated Placer County Response: The County will work with the owner of the property to determine their ability to participate in making corrections to items within the Restrooms. A specific completion date as of 5/16/22 has not been determined.**

**Updated Placer County Response – 6/30/2022: For items 5a-e related to corrective measures for the restroom, the owner is working to have this completed by September 30<sup>th</sup>, 2022.**

**Updated Placer County Response – 11/30/2022: The County will continue to reach out to the owner of the property to determine their ability and timing to participate in making corrections to outstanding items both internal and external to the building. As of November 30<sup>th</sup>, 2022 and given the time of year for construction, a definitive time for making corrections has not been established.**

- d. The distance from front edge of toilet-to-toilet paper dispenser measured from centerline of toilet paper dispenser is too short at 3 inches.

**Placer County Response: Corrections to the toilet paper dispenser will be made by providing new, compliant dispenser and installing to the compliant distance relative to the front edge of the toilet, if existing conditions allow. The County will work with the owner to implement the correction.**

**Updated Placer County Response: The County will work with the owner of the property to determine their ability to participate in making corrections to items within the Restrooms. A specific completion date as of 5/16/22 has not been determined.**

**Updated Placer County Response – 6/30/2022: For items 5a-e related to corrective measures for the restroom, the owner is working to have this completed by September 30<sup>th</sup>, 2022.**

**Updated Placer County Response – 11/30/2022: The County will continue to reach out to the owner of the property to determine their ability and timing to participate in making corrections to outstanding items both internal and external to the building. As of November 30<sup>th</sup>, 2022 and given the time of year for construction, a definitive time for making corrections has not been established.**

- e. The toilet paper dispenser is noncompliant in that it requires tight grasping, pinching, or twisting of the wrist.

**Placer County Response: See answer to item d.**

**Updated Placer County Response: The County will work with the owner of the property to determine their ability to participate in making corrections to items within the Restrooms. A specific completion date as of 5/16/22 has not been determined.**

**Updated Placer County Response – 6/30/2022: For items 5a-e related to corrective measures for the restroom, the owner is working to have this completed by September 30<sup>th</sup>, 2022.**

**Updated Placer County Response – 11/30/2022: The County will continue to reach out to the owner of the property to determine their ability and timing to participate in making corrections to outstanding items both internal and external to the building. As of November 30<sup>th</sup>, 2022 and given the time of year for construction, a definitive time for making corrections has not been established.**

#### **24. Stairs and Elevators**

- a. The County did not clearly present information requested by Auditors regarding stairways and handrails. The County shall, as part of the CAP, provide the correct information, assess compliance with the regulations below, and provide an explanation of the results of these steps.

**Placer County Response: County feels that information for 'stairways and handrails' along with new exhibits as part of this response to the auditor provides the necessary information with answers for corrections, if needed.**

#### **Section IV. Provision for Services to Applicants and Recipients who are Non-English-Speaking - Compliance Issue(s)**

- 25. Identification of primary language:** The County shall collect primary language data for each applicant/recipient. Div. 21-201.21. As part of the CAP, the County shall develop policy regarding the provision of services to NEP/LEP applicants/recipients, to include the following:

- a. Protocol for staff to follow up with applicants/recipients when their ALL 1388 is incomplete or missing at each intake/assessment and renewal/reassessment/recertification;
- b. Protocol for staff to monitor and resolve discrepancies between primary language information in the ALL 1388 and in electronic case records;
- c. Inform staff of the new policy/procedure, including via revised staff training (discussed in Section VII).

**26. Documentation of primary language:** The County shall ensure that case records identify applicants'/recipients' ethnic origin and primary language. Div. 21-201.21. As part of the CAP, the County shall:

- a. Return to CalFresh, CalWORKs and IHSS case files reviewed during the Review to correct records that contained errors and inconsistencies in the documentation of primary language;
- b. Develop protocol for the systematic documentation of applicants'/recipients' primary language (written and spoken) and ethnicity by SIU staff in Fraud Tracker. The County may wish to consider making primary language (written and spoken) a required field for fraud referrals, which information would then be transmitted to and captured in Fraud Tracker case records; and inform relevant staff of the new protocol.

**Placer County Response:** To address items 25 and 26, a written process will be developed to identify and document the primary language and ethnicity of all recipients and applicants following the directives detailed in those

**sections. The written process will include information in how the Fraud Tracker will be updated to include this primary language and ethnicity.**

**Updated Placer County Response: To address items 25 and 26, a written process will be developed to identify and document the primary language and ethnicity of all recipients and applicants following the directives detailed in those sections. The written process will include information in how the Fraud Tracker will be updated to include this primary language and ethnicity.**

**The written process and Fraud tracker will be completed by 2/28/2022.**

**Updated Placer County Response: The written process and Fraud tracker have been completed.**

- 27. Timely services:** The County must ensure that bilingual/interpretive services are prompt and without undue delays. Div. 21-115. Given the disparity in wait times for telephone interpreters experienced by staff in different programs, the County shall take steps to identify the source(s) of these delays and disparities; update its protocol for the use of vendor-provided telephone interpreter services to eliminate or reduce wait times as much as possible; and inform staff of any relevant changes.

**Placer County Response: To address item 27, the County will review and evaluate the source of any disparities or delays in providing bilingual/interpretative services. The current process will be updated to ensure wait times are reduced or eliminated to the extent possible.**

**Updated Placer County Response: This item will be completed by 2/18/2022.**

**Updated Placer County Response: The item has been completed.**

- 28. Bilingual staff:** The County shall ensure that a sufficient number of qualified bilingual employees are assigned to positions and locations serving a substantial number of non-English-speaking persons. Div. 21-115.1. A "qualified bilingual employee" is defined as an employee who, in addition to possessing the necessary qualifications for the particular classification, is certified through a process approved or administered by CDSS to be proficient in oral and/or written communication in the non-English language of the persons to be served. Div. 21-104(q)(1). As noted above, the information presented in the Primary Language Table in the County's 2021 Annual Plan is incomplete and also appears to have been incorrectly applied in the threshold language calculation and related processes. Therefore, as part of the CAP, the County shall complete the Corrective Action described under Section XI ("Civil Rights Compliance Plan Review and Approval") regarding threshold language determination, which includes steps to determine appropriate bilingual staffing methods and hiring goals.

**Placer County Response: To address item 28, the county will provide revised threshold language information following the Corrective Action described**

under Section XI (“Civil Rights Compliance Plan Review and Approval”). The revised calculation will be used to determine appropriate bilingual staffing methods and hiring goals.

**Updated Placer County Response:** Due to a delay in getting some of the data needs, Item 28 will be completed by 2/4/2022.

**Updated Placer County Response:** This item has been completed; this item was submitted to CDSS for review.

**29.** Temporary use of minors as interpreters: The County shall only allow the use of a minor (under the age of 18 years) to temporarily act as an interpreter under extenuating circumstances or at the specific request of the applicant/recipient. Div. 21-115.16. When a minor (under 18 years of age) is used as an interpreter, the County shall document the circumstances requiring temporary use of a minor interpreter in the case record. Div. 21-116.22. As part of the CAP step of developing policy regarding the provision of services to NEP/LEP applicants/recipients, the County shall:

- a. Develop protocol (including examples) to guide staff in determining what circumstances are “temporary” and “minimal” enough to justify using a minor as an interpreter in limited circumstances;
- b. Develop or refine/clarify protocol for staff documentation requirements when a minor is used as an interpreter including specific guidelines for what information to document and precisely where it should be documented; and
- c. Inform staff of the new protocol, including via revised staff training on the topic (discussed in Section VII).

**Placer County Response:** The written process will also include information about when a minor can be used temporarily as an interpreter and how that information must be documented in the case file as directed in item 29. In addition, the written process will include guidance on inserting information in the customer’s primary language preference into all Notices of Action.

**Updated Placer County Response:** To address item 30, the written process will be updated according to the guidance in ACL 12-128. The written process will be implemented by 2/28/2022.

**Updated Placer County Response:** This item has been completed.

**30.** Notice of potential ineffective communication: Applicants/recipients must be informed of the potential problems for ineffective communication when providing their own interpreters. The County shall document that the applicants/recipients were so informed in the case record. Div. 21-116.23. Even when the ALL 1387 is used as intended, its terms do not

clearly put the applicant/recipient on notice of the risks of ineffective communication when using a self-provided interpreter. The variability and uncertainty expressed among surveyed staff regarding whether and how to explain these risks to applicants/recipients is further indication of both the need for clear, explicit policy and training as well as the need to reinforce notice of the risk using explicit advisory language in the ALL 1387. As part of its CAP, and for consistency with Division 21, the County shall revise subsection (d) of its ALL 1387 to explicitly notify the applicant/recipient of the risk of ineffective communication when using a self-provided interpreter. In addition, as part of the CAP step of developing policy regarding the provision of services to NEP/LEP applicants/recipients, the County shall:

- a. Develop or refine/clarify protocol to guide staff as to when and how to explain the risks to applicants/recipients of using a self-provided interpreter;
- b. Develop or refine/clarify protocol to guide staff in documenting the provision of the above explanation as well as obtaining, incorporating and maintaining signed ALL 1387 forms into electronic case records; and
- c. Inform staff of the new protocol, including via revised staff training on the topic (discussed in Section VII).

**Placer County Response: To address item 30, the All 1387 as directed as staff will be provided with guidance on how to explain to the applicant/recipient and document in the case file.**

**Updated Placer County Response: To address item 30, the CR6181 required form will be provided to staff according to the guidance in ACL 12-128. This new form will be implemented by 2/28/2022**

**Updated Placer County Response: This item has been completed.**

**31. Written materials:** The County must use and provide translated forms in an applicant/recipient's primary language when translated by CDSS. Div. 21-115.2 As part of the CAP, the County shall:

- a. Return to CalFresh, CalWORKs and IHSS case files reviewed during the Audit that showed that forms were sent to the applicant/recipient in a language other than the identified primary written language.
- b. In each instance in which a form was sent in English despite the availability of a CDSS-translated version, identify the reason for the error, and take all needed steps to correct existing deficiencies and ensure they do not reoccur.
- c. Select a sample of 30 additional NEP/LEP cases from CDSS-funded programs to spot-check whether forms were sent in the wrong language to applicants/recipients in any of those cases. In addition to taking such steps as are necessary to immediately correct any identified errors, if errors are found in over 25% of the

cases sampled, create a plan for checking and correcting such errors in all

NEP/LEP cases on a more regular basis to promote and maintain regular compliance with language access obligations.

- d. In addition, as part of the CAP step of developing a policy regarding the provision of services to NEP/LEP applicants/recipients, the County shall:
- e. Develop or refine/clarify protocol regarding the use and provision of CDSS-translated forms;
- f. To the extent programs have different practices and considerations related to the use and provision of CDSS-translated forms, the protocol shall contain program-specific guidance; and
- g. Inform staff of the new or refined protocol, including via revised staff training (discussed in Section VII).

**Placer County Response:** To address item 31, each CF, CW, and IHSS case file reviewed during the will be evaluated to determine if an English form was sent in error when a non-English version was available in the customer's preferred language. The reason for the error will be identified and corrected. A sample of 30 additional case in each program area will be spot-checked following the same process. If the errors exceed 25% of the cases sampled, a plan will be developed to regularly check case files to ensure the correct notices are sent on all NEP/LEP cases.

**Updated Placer County Response:** Item 31 case reviews will be completed by 2/24/2022.



**Updated Placer County Response: Case reviews have been completed and an error has been identified and corrected. The additional case review resulted in identifying the same error. The county is in the process of addressing case file review with our QC/QA team.**

- 32. Notices of Action:** When the County uses translated forms and materials, such as NOAs containing space in which the County must insert information for the applicant/recipient, such information must be in the primary language of the applicant/recipient. Div. 21-115.2.

As part of the CAP step of developing policy regarding the provision of services to NEP/LEP applicants/recipients, the County shall:

- a. Develop or refine/clarify protocol to ensure that information inserted into NOAs is translated into the primary language of the applicant/recipient;
- b. To the extent programs have different practices and considerations related to the use and provision of CDSS-translated forms, the protocol shall contain program-specific guidance; and
- c. Inform staff of the new or refined protocol, including via revised staff training on the topic (discussed in Section VII).

**Placer County Response: The written process mentioned in the responses above will include guidance on inserting information in the customer's primary language preference into all Notices of Action.**

**Updated Placer County Response: The Non-English speaking service written process including guidance on inserting information in the customer's primary language preference into all Notices of Action will be completed by 2/28/2022.**

**All written processes and/or training developed or updated according to the directives in this section will be provided to staff and is expected to be completed by February 2022.**

**Updated Placer County Response: This item has been completed.**



## Section VI. Provision for Services to Applicants and Recipients Who Have Disabilities - Compliance Issue (s)

- 33. Identification of disabilities:** 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) cited in [ACL 19-45](#). As part of the CAP, the County shall develop policy regarding the provision of services for individuals with disabilities to include the following:
- a. An expanded range of tools and/or guidelines for use by staff to identify an individual with a disability, such as developing a form that asks applicants/recipients about disabilities and related needs and/or establishing a practice whereby staff review program application/renewal questions about disabilities with all applicants/recipients.
  - b. Protocol for staff to assist an individual in self-identifying a disability and related needs when a disability is known or the need for accommodation is obvious. This might involve requiring staff to initiate inquiries about and/or offers of RA when certain indicators are present such as specific aid type(s) in electronic case records.
  - c. To the extent programs have different practices and considerations related to the identification of disabilities, the policy shall contain program-specific guidance,
  - d. Inform staff of the new policy/protocol, including via revised staff training on the topic (discussed in Section VII).
  - e. Protocol for staff to assist an individual in self-identifying a disability and related needs when a disability is known or the need for accommodation is obvious. This might involve requiring staff to initiate inquiries about and/or offers of RA when certain indicators are present such as specific aid type(s) in electronic case records.
  - f. To the extent programs have different practices and considerations related to the identification of disabilities, the policy shall contain program-specific guidance,
  - g. Inform staff of the new policy/protocol, including via revised staff training on the topic (discussed in Section VII).

**34. Documentation of a disability:** The County shall ensure that an applicant's/recipient's case record identifies the applicant/recipient as disabled. The County shall document an applicant's/recipient's request for services in writing. Div. 21-116.3. The County must ensure that proper and consistent documentation identifying all the required elements to ensure compliance is present in an applicant's/recipient's case file. Div. 21-116. As part of the CAP direction to develop a policy regarding the provision of services for individuals with disabilities, the County shall:

- a. Develop protocol for staff to document individuals' disabilities and related needs in electronic case management systems in a manner that is accurate, internally consistent, and readily visible, including reviewing case management system functionality for under-utilized tools and options, such as the accommodation indicator in CalWIN.
- b. To the extent programs have different practices and considerations related to the documentation of disabilities, the policy shall contain program-specific guidance while also emphasizing the imperative to capture information about disabilities and RAs in a systematic and readily identifiable manner so that it can travel between the various County programs in which an individual may participate. This is true even for programs for which provision of individualized assistance and services to individuals with disabilities is a core function, such as IHSS and CSOC.
- c. The protocol shall be consistent with any applicable requirements regarding documentation of Reasonable Accommodation requests. See [ACL 19-45](#).
- d. Inform staff of the new protocol, including via revised staff training on the topic (discussed in Section VII).

**Placer County Response:** To address items 33 and 34 a written process will be developed to identify and document an individual's disability following the directives detailed in those sections and in ACL 19-45.

**Updated Placer County Response:** This written process will be completed by 3/18/2022.

**Updated Placer County Response:** This written process will be completed and submitted to CDSS for review.

**Updated Placer County Response - 11/30/2022:** Written process accepted by CDSS, this item is complete.

**35. Reasonable Accommodation Policy:** The County shall adopt a written policy that reflects the requirements set forth in ACL 19-45. As a part of the CAP, the County shall:

- a. Revise the existing Reasonable Accommodation policy to incorporate all areas addressed by ACL 19-45, including those listed above. To the extent programs have different practices, the policy shall contain program-specific guidance. The County is encouraged to consult the resources provided in Section VI of ACL 19- 45 and may also contact CDSS for feedback and technical assistance.
- b. Submit a draft of the revised policy for CDSS' review.

**Placer County Response: To address item 35, the Reasonable Accommodation policy will be updated in accordance with ACL 19-45 and as directed in items 33 and 34.**

**Updated Placer County Response: The Reasonable Accommodation policy will be completed by 3/25/2022.**

**Updated Placer County Response: This written process will be completed and submitted to CDSS for review.**

**Updated Placer County Response - 11/30/2022: Written process accepted by CDSS, this item is complete.**

## **Section VII. STAFF DEVELOPMENT AND TRAINING - Compliance Issue(s)**

**36. Division 21, Civil Rights Training:** The County shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1. As part of the CAP, the County shall:

- a. receiving, documenting, and responding to reasonable accommodation requests;
- b. Revise information on use of County forms for clarity and accuracy;
- c. Provide detailed information and guidance on the County's discrimination complaint policy and procedure, including training for staff on how to receive complaints and assist applicants/recipients with filing complaints.
- d. Include SIU Unit investigators and other public contact staff in mandated annual training. Div. 21-117.1; 21-104(p)(1)

- e. The County may contact CDSS for feedback and technical assistance.

**Placer County Response:** The existing Division 21, Civil Rights Training will be updated according to the directives and details in item 31.

**Updated Placer County Response:** Due to the unforeseen delay mentioned previously in the updated response in Section three, the county is requesting an extension for this item. The Civil Rights Training updates will be completed by 4/30/2022 but will be conducted in the following month by 5/13/2022.

**Updated Placer County Response:** Civil Rights Training has been submitted to CDSS for review. Once the review is completed and any necessary corrections are made, the training will be provided to staff. The county anticipates the training can be completed by 6/13/2022.

**Updated Placer County Response - 11/30/2022:** Training accepted by CDSS, this item is complete.

**37. Cultural Awareness Training:** The County shall ensure that all public contact employees receive cultural awareness training to ensure that public contact staff have an understanding of, and sensitivity to, various cultural groups including individuals with disabilities, to ensure equal delivery of services in the County's population. As part of the CAP, the County shall:

- a. Review the process by which Cultural Awareness training is provided to public contact staff across all departments and programs to identify gaps in training delivery; and
- b. Submit a plan to close all identified gaps and ensure that training is provided to all public contact staff.

**Placer County Response:** With regard to item 37, after reviewing the current Cultural Awareness training material and surveying staff to identify gaps the cultural awareness plan will be developed and submitted to CDSS.

**Updated Placer County Response:** Item 37, will be completed and submitted to CDSS for approval by 4/30/2022.

**Updated Placer County Response:** The county is in the process of adapting an existing cultural awareness training and is working with our outreach team to find community-based organizations in our community to provide for cultural awareness training for staff. Expected completing date is 6/30/22.

**Updated Placer County Response - 11/30/2022: Cultural awareness training created with information and input for community-based organization and provided to staff. One additional training on Cultural Considerations: Engaging Russian & Ukrainian-speaking Clients has been provided to staff as well. More trainings are being discussed with Placer County Organizational Development Dept.**

**38. MEPA Training:** The County shall ensure that CSW's receive MEPA training to ensure that public contact staff have knowledge of, and properly apply, placement prohibitions contained in MEPA. 42 U.S.C. 672, 674, and 1996(b). As part of the CAP, the County shall:

- a. Review the process by which MEPA training is provided to CSWs to identify gaps in training delivery; and
- b. Submit a plan to close all identified gaps to ensure that training is provided to all CSWs.

**Placer County Response: To address item 38, the MEPA training material and process will be reviewed and updated to close all identified gaps.**

**Updated Placer County Response: To address item 38, the MEPA training material and process will be reviewed and updated to close all identified gaps will be completed and conducted by 4/30/2022.**

**Updated Placer County Response - 11/30/2022: Updated MEPA training was provided to staff in February 2022 and work has started with the training academy to provide continuous opportunities for refresher training.**

**39. Reasonable Accommodation Training:** The County 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. ACL 19-45, Section I.

As part of the CAP, the County shall submit a plan to train staff on the revised Reasonable Accommodation Policy (see Section VI) after the Policy is approved by CDSS.

**Placer County Response: To address item 39, after the updated Reasonable accommodations plan has been approved by CDSS, the training material will be developed and provided to all public contact staff following update, upon hire and annually thereafter.**

**Updated Placer County Response: Due to the unforeseen delay mentioned previously in the updated response in Section three, the county is requesting an extension for this item. The Reasonable Accommodations training plan**

**will be completed by 4/30/2022 but will be conducted in the following month by 5/13/2022.**

**All training listed in the responses from these sections will be completed and conducted with required staff by April 2022.**

**Updated Placer County Response: All training listed in the responses from these sections will be completed by 4/30/2022 however the Reasonable Accommodations and Civil Rights Trainings will be conducted by 5/13/2022.**

**Updated Placer County Response: The training has been submitted to CDSS for review. Once the review is completed and necessary correction has been made the training will be provided to staff. The county expects the completion date of 6/30/22.**

**Updated Placer County Response - 11/30/2022: Reasonable accommodations accepted by CDSS, this item is complete.**

## Section VIII – Discrimination Compliant Process – Compliance Issue(s)

**40. Complaint Processing Procedure:** The County shall ensure policies addressing discrimination complaint handling are clear, consistent, and comport to the required complaint processing obligations. Div. 21-203. As part of the CAP, the County shall:

- a. Develop a detailed and comprehensive complaint processing protocol. Key topics shall include:
- b. Procedures for complaint intake, whether by mail, email, telephone, or in person. This procedure should provide guidance to staff on assisting applicants/recipients with complaint filing and routing discrimination complaints to the CRC.
- c. Procedures for initial complaint evaluation by the CRC, to determine if it meets jurisdictional threshold requirements
- d. Procedures for providing referrals for non-jurisdictional and non-discrimination complaints
- e. Procedures for maintaining and updating the Complaint Log
- f. Procedures for complaint investigation and report writing
- g. Submit draft of protocol for CDSS review. The County may also contact CDSS for feedback and technical assistance.
- h. Procedures for complaint intake, whether by mail, email, telephone, or in person. This procedure should provide guidance to staff on assisting applicants/recipients with complaint filing and routing discrimination complaints to the CRC.
- i. Procedures for initial complaint evaluation by the CRC, to determine if it meets jurisdictional threshold requirements
- j. Procedures for providing referrals for non-jurisdictional and non-discrimination complaints
- k. Procedures for maintaining and updating the Complaint Log
- l. Procedures for complaint investigation and report writing

- m. Submit draft of protocol for CDSS review. The County may also contact CDSS for feedback and technical assistance.
- n. Procedures for complaint intake, whether by mail, email, telephone, or in person. This procedure should provide guidance to staff on assisting applicants/recipients with complaint filing and routing discrimination complaints to the CRC.
- o. Procedures for initial complaint evaluation by the CRC, to determine if it meets jurisdictional threshold requirements
- p. Procedures for providing referrals for non-jurisdictional and non- discrimination complaints
- q. Procedures for maintaining and updating the Complaint Log
- r. Procedures for complaint investigation and report writing
- s. Submit draft of protocol for CDSS review. The County may also contact CDSS for feedback and technical assistance.

**41. Employee Awareness of Discrimination Complaint Process:** The County shall ensure staff can accurately identify a discrimination complaint. The County shall ensure staff have knowledge of the discrimination complaint process and their role in assisting applicants/participants to file civil rights complaints. The County shall ensure staff are able to differentiate it from other complaint processes. Div. 21-117 and Div. 21-203. As part of the CAP, once the County's discrimination complaint protocol is approved by CDSS, the County shall:

- a. Inform staff of the new policy/procedure, including via revised staff training on the topic (discussed in Section VII).
- b. The revised training should also reinforce staff knowledge about where the PUB 86 is posted in office facilities and what information it contains.
- c. The County may contact CDSS for feedback and technical assistance.

**Updated Placer County Response: The Discrimination Complaint Process will be completed by 2/18/2022.**

**Updated Placer County Response: This item has been completed.**

**42. Complaint Log:** The County shall keep a control log in which all complaints of discrimination are entered by year and date the complaint was received. The County shall ensure that all required information is entered for each complaint. Div. 21-203.21. As part of the CAP, the County shall create a list of definitions explaining how the County will use each column in the Log. This Log should use the definitions provided for Resolution and Decision in Div. 21-203.217-.218. Definitions may be included in the above-described

Discrimination Complaint Processing Procedure or maintained as an attachment/tab with the Complaint Log.

**Placer County Response:** Regarding items 40,41 and 42, the discrimination compliant process will be updated and submit to CDSS for approval according to the directives in item 36, Once approved, the updated compliance process will be provided to staff. The Complaint Log will be updated according to Div. 21-203. 21. The county will define each required log element provided in Div. 21-203.217-.218. and explain how each will be used in the Log. These definitions will be maintained as an attachment with the Compliant Log.

**Updated Placer County Response:** The Discrimination Compliant Log will be completed by 2/18/2022.

**Updated Placer County Response:** This item has been completed.

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

The Placer County Health and Human Services Civil Rights Compliance Plan for the period May 1, 2021, through April 30, 2022, was received on March 5, 2021. Thank you for submitting your agency's Civil Rights Compliance Plan. Before approving the Civil Rights Compliance Plan, we request the following augmentations:

Revise the Annual Plan to respond to the issues noted in this Report including:

- a. **Section 3 ("Community Profile"):** The County's Annual Plan does not describe any unusual or significant county or community circumstances that adversely affect, or may affect, the effective delivery of services, or policies and procedures to remedy this. As explained in [ACIN 1-69-20](#), Counties must continue to meet their civil rights obligations even in emergency situations. Revise this section to describe any adverse effect(s) that COVID-19 and the threat of wildfire each have (or may have) on the delivery of services to applicants/recipients, as well as the County's policies and procedures to remedy this.
- b. **Section 7 ("County Services Provided by Contractors, Subcontractors, and Vendors"):** The County's procedure for ensuring and monitoring vendor compliance with nondiscrimination laws and regulations lacks operational detail. Revise this section and corresponding Attachments 12, 13, and 14 to clarify applicable procedures and requirements, and submit a draft of the revised procedure and attachments for CDSS' review.

c. **Section 8 (“Primary Language Data Statistics, Staffing, and Hiring Goals”):**

The County provides only programmatic threshold language data, stating: “there is no longer the need to break down the languages by office” due to the agency’s transition from case carrying maintenance to a Service Center Task-Based environment.

Division 21 states broadly that threshold language should be considered by both location *and* program. Div. 21-104(s)(2). This means that an office’s threshold languages consist of threshold languages for that site *and* for programs administered at that site. Office locations that have not identified location-specific threshold languages can meet this requirement by applying all programmatic threshold languages for covered programs to their site.

The County must implement one of these approaches to accurately identify threshold languages by program and location. In identifying programmatic threshold languages, the County must:

- recognize Spanish as threshold for CalWORKs;
- obtain disaggregated CAPI data from CAPI Consortium lead agency Sacramento DHA and include Placer County-specific CAPI primary language data in its analysis;
- Confirm whether data in the “FC” column of the Primary Language Table includes CWS data and incorporate CWS primary language data if it does not;
- Include IHSS primary language data.
- Once threshold languages are identified by program and location, the County shall develop a revised explanation of the requirements and compliance in this section of the Plan and recalculate the following:
  - required number of bilingual public contact positions for all major occupational groups for all its programs and locations;
  - hiring needs/goals to meet those required numbers; and
  - a plan and timetable for meeting any identified hiring needs/goals

d. **Section 11 (“Staff Development and Training”) and Attachment 8, Annual Civil Rights Training:** Revise the PowerPoint training as indicated in Section VII and elsewhere in this Report.

e. Revise all instances of the use of the term “Asian” to encompass many different languages. The County may have intended to refer to “Asian languages” as a group, but this is unclear and is not sufficiently specific to ensure compliance.

- f. Revise instances of gender-binary language with gender-inclusive language (i.e., replacing "he/she" with "they/them").
- g. Include all new and revised civil rights-related policies, procedures and protocols identified in this Report. Where indicated, submit drafts of such policies, procedures and protocols to CDSS for review as directed in this Report.

**Placer County Response: The Annual Plan will be updated according to the directives listed in the section above. The revised Annual plan draft will be submitted to CDSS for review. Once approved, the approved plan will be provided to staff.**

**Updated Placer County Response: The updated Annual Plan will be completed by 4/30/2022.**

**Updated Placer County Response: This item has been submitted to CDSS for review.**