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DEPARTMENT OF SOCIAL SERVICES
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GAVIN NEWSOM
GOVERNOR

July 31, 2019

Antonia Jiménez, Director
Los Angeles County Department of Public Social Services
12860 Crossroads Parkway South
City of Industry, CA 91746

Dear Mrs. Jimenez:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the Reviewers from our office during the course of the Civil Rights Compliance Review of July 17th - July 18th, 2018, and July 23rd - 26th, 2018. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with the Web Content Accessibility Guidelines (WCAG) as per California Government Code 7405, we also require the CAP to be submitted electronically as a Word document via [Civil Rights Unit email](mailto:crb@dss.ca.gov) (crb@dss.ca.gov).

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our [Civil Rights Unit website](http://www.cdss.ca.gov/inforesources/Civil-Rights/Compliance-Reports-and-Corrective-Action-Plans) (<http://www.cdss.ca.gov/inforesources/Civil-Rights/Compliance-Reports-and-Corrective-Action-Plans>).

If you need technical assistance in the development of your CAP, please feel free to contact Elsa Vazquez at (916) 654-2110. You may also contact us via [Civil Rights Unit e-mail](mailto:crb@dss.ca.gov) (crb@dss.ca.gov).

Sincerely,

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

Enclosure

c: Charles Palmer, Civil Rights Coordinator

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
LOS ANGELES DEPARTMENT OF PUBLIC SOCIAL
SERVICES**

Conducted on

**July 16th - 18th, 2018
and
July 23rd - 26th, 2018**

California Department of Social Services

Housing, Homelessness, and Civil Rights Branch

Civil Rights Unit

744 P Street, M.S. 8-16-70

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Reviewers:

Elsa Vazquez

And

Tiffany Marsh

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I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Unit (CRU) staff was to assess the Los Angeles County Department of Public Social Services (LADPSS) with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on July 16 - 18, 2018, and July 23 - 26, 2018. An exit interview was held on July 30, 2018 to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Administrative State Hearings Office (ASH)	811 Wilshire Blvd., Los Angeles	State Hearings (no file review; assessment of physical accessibility only)	Armenian, Cambodian, Chinese, Farsi, Hmong, Korean, Laotian, Russian, Spanish, Tagalog and Vietnamese.
Metro North #38	2601 Wilshire Blvd., Los Angeles	Cash Assistance Program for Immigrants (CAPI) (no assessment of physical accessibility; case file review only)	Spanish, Korean.
Civil Rights Section	12860 Crossroads Pkwy., South, City of Industry	Americans with Disabilities Act (ADA) Hotline Call Center overview. (no assessment of physical accessibility)	Armenian, Cambodian, Chinese, Farsi, Hmong, Korean, Laotian, Russian, Spanish, Tagalog and Vietnamese.
Pomona #36	2040 W. Holt Ave., Pomona	CalFresh	Spanish, Mandarin and Vietnamese.

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Pomona Greater Avenues for Independence (GAIN)	2255 North Garey Ave., Pomona	GAIN	Spanish.
El Monte #4	3350 Aerojet Ave., El Monte	CalWORKs & CalFresh	Spanish, Chinese, Mandarin and Cantonese.
El Monte #74	9320 Telstar Ave., El Monte	In Home Supportive Services (IHSS) Reasonable Modification Request (RMR) overview	Spanish, Mandarin, Cantonese, Vietnamese and Armenian.
Compton #26	211 East Alondra Blvd., Compton	CalWORKs & CalFresh	Spanish.
San Fernando #32	9188 Glenoaks Blvd., Sun Valley	CalFresh	Spanish.
Customer Service Center I (CSC I)	3400 Aerojet Ave., El Monte	Call Center (no assessment of physical accessibility)	Armenian, Cambodian, Chinese, Farsi, Hmong, Korean, Laotian, Russian, Spanish, Tagalog and Vietnamese.

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2018-2019 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the County.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of civil rights coordinator and ADA coordinator
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussion with community advocate groups.

In this review the following organization(s) provided feedback:

Organization	Contact	Address
Legal Aid Foundation of Los Angeles	Claudia Menjivar and Helen Tran	5228 Whittier Blvd., Los Angeles
Maternal and Child Health Access	Marcela Marquez and Ivette Vivanco	111 West 6 th St., Ste. 400, Los Angeles
Neighborhood Legal Services of Los Angeles	David Kane and Lena Silver	13327 Van Nuys Blvd., Los Angeles
Public Counsel CARES Homelessness Prevention Law Project	Chris Homandberg	610 S. Ardmore Avenue, Los Angeles
Inner City Law Center	Anita Garcia Velasco and Jin Lee	624 S. Grand Ave., Ste. 2510, Los Angeles
Asian Americans Advancing Justice	Weiyu Zhang and Doreena Wong	1145 Wilshire Blvd., 2 nd Floor, Los Angeles
California Food Policy Advocates	Kevin Lee	205 South Broadway, Ste. 402, Los Angeles
Bet Tzedek Legal Services	Kim Selfon	3250 Wilshire Blvd., 13 th Floor, Los Angeles

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

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

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

A. Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	16	13
Employment Workers	3	2
Adult Program Workers	4	3
Receptionist/Screeners	6	3
Total	29	21

B. Civil Rights Coordinator, ADA Coordinator and Program Manager Surveys:

Number of surveys distributed: 8

Number of surveys received: 8

C. Reviewed Case Files:

English speakers' case files reviewed: 28

Non-English or limited-English speakers' case files reviewed: 110

Languages of clients' cases: American Sign Language (ASL), Armenian, Cambodian, Chinese, Farsi, Hmong, Korean, Laotian, Russian, Spanish, Tagalog and Vietnamese.

Reasonable Accommodation cases reviewed: 25

Sections III through IX of this report contain specific Division 21 civil rights requirements and present field review findings regarding the County's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

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

Section XI reviews the County's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

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

Section XIII of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings: Access to Services, Information and Outreach

Question (Please answer yes/no and provide response with comments.)	Comments
Does the County accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	Yes, applications may be mailed. No, County office hours are only Monday - Friday 8:00 a.m. - 5:00 p.m.
Can clients, including those with disabilities, access services when they are unable to go to the office?	Yes, customers, including those with disabilities can access services through the Call Center and/or online via the website Your Benefits Now (YBN), https://www.yourbenefits.laclrs.org
Does the County ensure the awareness of available services individuals in remote areas?	Yes, awareness is made through community-based organizations and Public Service Announcements via television and radio.

B. Findings: Signage, Posters and Pamphlets

Question (Please answer yes/no and provide response with comments.)	Comments
Does the County use the CDSS pamphlet "Your Rights under California Welfare Programs" (PUB 13)?	Yes, the PUB 13 is reviewed with each customer at intake and redetermination.
Is the pamphlet distributed and explained to each client at intake and re-certification?	Yes.

Question (Please answer yes/no and provide response with comments.)	Comments
Is the current version of PUB 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukrainian, and Vietnamese?	Yes.
Were the current versions of the required posters present in the lobbies?	Yes.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non- English-speaking clients translated into appropriate languages?	The El Monte District #4, 4 th floor lobby did not have instructional/directional signs posted translated in the district's threshold languages (Spanish, Chinese, Mandarin and Cantonese).

C. Corrective Actions

Informational Element	Corrective Action Required
Directional and Instructional signage	LADPSS shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients. Where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. Division 21-107.212

D. Recommendation

The County is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

PUB 13 "Your Rights under California Welfare Programs" (08/16)
PUB 86 "Everyone is Different, but Equal Under the Law" (03/07)
Form AD 475B "And Justice for All" (12/15)

Contact the Civil Rights Unit to receive the most recent versions, or download the PUB 13 from the [Civil Rights Unit website](http://www.cdss.ca.gov/inforesources/Civil-Rights/Your-Rights-Under-California-Welfare-Programs) (<http://www.cdss.ca.gov/inforesources/Civil-Rights/Your-Rights-Under-California-Welfare-Programs>).

Civil Rights Compliance Review
Los Angeles County Department of Public Social Services
July/2018

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The County must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

1. Facility Location: ASH, 811 Wilshire Blvd., Los Angeles

Facility Element/Finding	Corrective Action
Main Entrance – Glass door pressure measured excessive at 15 pounds.	The force for pushing or pulling open a door or gate other than fire doors shall be as follows: 1. Interior hinged doors and gates: 5 pounds maximum 2. Sliding or folding doors: 5 pounds maximum 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 pounds. Exterior hinged doors: 5 pounds maximum. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 - 2))

- a) Corrective Actions: Refer to Corrective Action column above.
- b) Recommendations: Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above.

Observation:

Parking is challenging for customers attending State Hearings because there no designated parking lot for this building. As a result, customers must find public parking in a highly congested area. Parking fees can be expensive, and parking may not be located close to the building and may not be accessible for customers with disabilities. This is a practical matter of distance and fatigue for customers who have difficulty walking or wheeling a wheelchair for long distances. The Reviewers were made aware that the County has discussed relocating the State Hearings Office to a more accessible location.

Recommendation:

If further consideration is given to relocating the State Hearings Office, the Reviewers recommend a centrally located facility with accessible parking for customers with disabilities, and the availability of transportation (public and private) for use by the customer population.

2. Facility Location: Pomona #36, 2040 W. Holt Ave., Pomona

Facility Element/Finding	Corrective Action
<p>Parking Lot – There is a parking lot located across the street from this facility. This parking lot was acquired February 2018. Based on information provided to the Reviewers, this parking lot will be the designated parking lot for customers for this facility. The parking lot is out of compliance.</p>	<p>The parking lot does not meet CA T24 and ADA applicable standards and is out of compliance. Please refer to sections below:</p> <ul style="list-style-type: none"> • CA T24 11B-502.8 • CA T24 11B-502.8.1 • CA T24 11B-502.8.2 • CA T24 Table 11B-208.2; ADA Table 208.2 • CA T24 11B-502.6.1 • CA T24 11B-502.6; ADA 502.6 • CA T24 11B-502.6 • CA T24 11B-502.6.2 • CA T24 11B-208.2.4; ADA 208.2.4 • CA T24 11B-502.6; ADA 502.6 • CA T24 11B-502.2; ADA 502.2 • CA T24 11B-502.2; ADA 4.6.3 • CA T24 11B-502.3; ADA 502.3 • CA T24 11B-502.3.4; ADA 502.3.4 • CA T24 11B-406.5.1; ADA 406.5

Facility Element/Finding	Corrective Action
	<ul style="list-style-type: none"> • CA T24 11B-502.2; ADA 502.2 • CA T24 11B-502.3.1; ADA 502.3 • CA T24 11B-502.3; ADA 502.3 • CA T24 11B-502.3.1; ADA 502.3.1 • CA T24 11B-502.3.2; ADA 502.3.2 • CA T24 11B-502.6.4.1 OR • CA T24 11B-502.6.4.2 • CA T24 11B-502.3.3 • CA T24 11B-502.3.3 • CA T24 11B-502.3.3; ADA 502.3.3 • CA T24 11B-502.3.3 • CA T24 11B-502.7.1 • CA T24 11B-502.3; ADA 502.3 • CA T24 11B-208.3.1; ADA 208.3.1 • CA T24 11B-502.7.2
Men's Restroom – Towel dispenser measured too high at 49 inches.	<p>Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route. (CA T24 11B-603.5)</p> <p>All operable parts, including coin slots, shall be 40 inches maximum above the finish floor. (CA T24 11B-603.5)</p>
<p>Men's Restroom – Baby changing table (grip, handle or release) reach measured too high at 55 inches.</p> <p>Women's Restroom – Baby changing table (grip, handle or release) reach measured too high at 56 inches.</p>	<p>Baby changing table shall comply with Sections 11B-309 and 11B-902. (CA T24 11B-226.4)</p> <p>The tops of dining surfaces and work surfaces shall be 28 inches minimum and 34 inches maximum above the finish floor or ground. (CA T24 11B-902.3) (ADA 902.3)</p> <p>Baby changing tables when deployed shall not obstruct the required width of an accessible route except as allowed by Section 11B-307.2. (CA T24 11B-226.4)</p> <p>Baby changing tables shall not be located in toilet compartments complying with Section 11B-604.8 within a multiple accommodation toilet facility. (CA T24 11B-226.4)</p> <p>Where a forward reach is unobstructed the high forward reach shall be 48 inches maximum and the low forward</p>

Facility Element/Finding	Corrective Action
	reach shall be 15 inches minimum above the finish floor or ground. (CA T24 11B-308.2.1) (ADA 308.2.1)

a) **Corrective Actions:** Refer to Corrective Action column above.

b) **Recommendations:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above.

Observation:

The Reviewers were informed the Main Entrance doors, including both Men's and Women's Restroom doors, are kept open for customers during regular office business hours (8:00 a.m. – 5:00 p.m.).

Recommendation:

If the Main Entrance doors or either the Men's or Women's restroom doors are closed at any time during regular office business hours, the force for pushing or pulling open an interior hinged door or gate shall be 5 pounds maximum, and the force for pushing or pulling open a required fire door shall not exceed 15 pounds. CA T24 11B-404.2.9 and ADA 404.2.9.

3. Facility Location: Pomona GAIN – 2255 North Garey Ave., Pomona

Facility Element/Finding	Corrective Action
Parking lot – Signage on pavement does not clearly depict a wheelchair with occupant due to fading paint.	The parking space shall be marked with an International Symbol of Accessibility (Symbol) in white on a blue background - a minimum 36 inches wide by 36 inches high. (CA T24 11B-502.6.4.1) <u>OR</u> ...in white or a suitable contrasting color (CA T24 11B-502.6.4.2)
Men's and Women's Restroom – Baby Changing table (grip, handle or release) reach measured too high at 51 inches.	Baby changing table shall comply with Sections 11B-309 and 11B-902. (CA T24 11B-226.4) The tops of dining surfaces and work surfaces shall be 28 inches minimum and 34 inches maximum above the finish floor or ground. (CA T24 11B-902.3) (ADA 902.3) Baby changing tables when deployed shall not obstruct the required width of an accessible route except as allowed by Section 11B-307.2. (CA T24 11B-226.4)

Facility Element/Finding	Corrective Action
	<p>Baby changing tables shall not be located in toilet compartments complying with Section 11B-604.8 within a multiple accommodation toilet facility. (CA T24 11B-226.4)</p> <p>Where a forward reach is unobstructed the high forward reach shall be 48 inches maximum and the low forward reach shall be 15 inches minimum above the finish floor or ground. (CA T24 11B-308.2.1) (ADA 308.2.1)</p>

- a) Corrective Actions: Refer to Corrective Action column above.
- b) Recommendations: Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above.

4. Facility Location: El Monte #4, 3350 Aerojet Ave., El Monte

Facility Element/Finding	Corrective Action
<p>Parking Lot – Accessible parking spaces do not meet ADA measurement requirements.</p> <p>Accessible spaces measured too short in length between 16 feet 3 inches and 16 feet 10 inches, and too narrow in width at 8 feet 2 inches and 8 feet 6 inches.</p>	<p>Parking space minimum dimensions: 9 feet wide by 18 feet long. (CA T24 11B-502.2) (ADA 502.2)</p>
<p>Van accessible spaces and access aisle do not meet ADA measurement requirements.</p> <p>Van accessible spaces and access aisle measured to short in length between 16 feet 3 inches and 16 feet 10 inches, and too narrow in width by 8 feet 2 inches and 8 feet and 6 inches in width.</p>	<p>Van Parking Space Minimum Dimensions: 12 feet wide by 18 feet long. (CA T24 11B-502.2) (ADA 502.2)</p> <p>Access aisle minimum dimensions: 5 feet wide by 18 feet long. (CA T24 11B-502.2) (ADA 4.6.3)</p>

Facility Element/Finding	Corrective Action
Basement Lobby – Women’s Restroom – Door pressure measured excessive at 7 pounds.	The force for pushing or pulling open a door or gate other than fire doors shall be as follows: 1. Interior hinged doors and gates: 5 pounds maximum 2. Sliding or folding doors: 5 pounds maximum 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 pounds. Exterior hinged doors: 5 pounds maximum. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 - 2))
Unisex Restroom – 4 th floor soap dispenser measured too high at 42 inches.	Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route. (CA T24 11B-603.5) All operable parts, including coin slots, shall be 40 inches maximum above the finish floor. (CA T24 11B-603.5)

a) **Corrective Actions:** Refer to Corrective Action column above.

b) **Recommendations:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above.

5. Facility Location: El Monte #74, 9320 Telstar Ave., El Monte

Facility Element/Finding	Corrective Action
Men’s Restroom – Toilet tissue dispenser is located too far from the front edge of toilet at 12 inches.	Toilet paper dispensers shall be 7 inches minimum and 9 inches maximum in front of the water closet measured to the centerline of the dispenser. (CA T24 11B-604.7) (ADA 604.7)
Women’s Restroom – Toilet tissue dispenser is located too far from the front edge of toilet at 12 inches.	

a) **Corrective Actions:** Refer to Corrective Action column above.

b) **Recommendations:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above.

6. Facility Location: Compton #26 - 211 East Alondra Blvd., Compton

Facility Element/Finding	Corrective Action
Emergency alarms – Audible and visual alarm notifications were not present in the lobby area.	<p>Audible alarm notification shall be provided and emit a distinctive sound that is not to be used for any purpose other than that of a fire alarm. (CA T24 907.5.2.1)</p> <p>Visible alarm notification appliances shall be provided in public use areas and common use areas, including but not limited to:</p> <ul style="list-style-type: none">- Sanitary facilities including restrooms, bathrooms and shower rooms- Corridors- Multipurpose rooms- Occupied rooms where ambient noise impairs hearing of the fire alarms- Lobbies- Meeting rooms- Classrooms <p>(CA T24 907.5.2.3.1)</p>

a) Corrective Actions: Refer to Corrective Action column above.

b) Recommendations: Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above.

Observation:

The Reviewers were informed the Main Entrance doors, including both Men's and Women's Restroom doors, are kept open for the customers during regular office business hours (8:00 a.m. – 5:00 p.m.).

Recommendation:

If the Main Entrance doors or either the Men's or Women's restroom doors are closed at any time during regular office business hours, the force for pushing or pulling open an interior hinged door or gate shall be 5 pounds maximum, and the force for pushing or pulling open a required fire door shall not exceed 15 pounds. CA T24 11B-404.2.9; ADA 404.2.9.

7. Facility Location: San Fernando #32 – 9188 Glenoaks Ave., Sun Valley

Facility Element/Finding	Corrective Action
Emergency alarms – Audible and visual alarm notifications were not present in the lobby area.	<p>Audible alarm notification shall be provided and emit a distinctive sound that is not to be used for any purpose other than that of a fire alarm. (CA T24 907.5.2.1)</p> <p>Visible alarm notification appliances shall be provided in public use areas and common use areas, including but not limited to:</p> <ul style="list-style-type: none"> - Sanitary facilities including restrooms, bathrooms and shower rooms - Corridors - Multipurpose rooms - Occupied rooms where ambient noise impairs hearing of the fire alarms - Lobbies - Meeting rooms - Classrooms <p>(CA T24 907.5.2.3.1)</p>
Men's Restroom – Pipes under sink were not securely insulated.	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5)
Women's Restroom – Pipes under sink were not securely insulated.	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5)

a) Corrective Actions: Refer to Corrective Action column above.

b) Recommendations: Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above.

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

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

on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a County may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which it can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDDs), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, counties must ensure that written materials be available in individuals' primary languages if the forms and materials are provided by CDSS in that language, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County identify a client's language need upon first contact? How?	<p>Yes, customers' languages are identified at initial contact. Customers inform the receptionist of their preferred language by stating it or pointing it out using the "Can we Help You?" poster or the Language Line Solutions Identification Card located at the reception window.</p> <p>Language preference is a question on the Statewide Automated Welfare System 1 application (SAWS 1) and Statewide Automated System 2 application (SAWS 2). Staff are required to document customers' language preference from either SAWS 1 or SAWS 2 in the Los Angeles Eligibility Automated Determination Evaluation System (LEADER), LEADER Replacement System (LRS).</p>

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County use a primary language form?	No.
Does the client self-declare on this form?	Not applicable.
Are non-English- or limited- English-speaking clients provided bilingual services?	Yes, either in-person with staff or by telephone using an interpretive services provider contracted by the County.
After it has been determined that the client is limited-English or non-English speaking, is there a County process for procuring an interpreter?	Yes.
Does the County have a contracted language line provider, a county interpreter list, or any other interpreter process?	Yes, the County has a contracted language line provider, and a County bilingual interpreter list that is available to all staff.
Is there a delay in providing interpretive services?	No.
Are County interpreters certified?	Yes, staff are certified through an oral and written competency examination administered by LADPSS Human Resources Division.
Does the County have adequate interpreter services?	Yes.
Does the County allow minors to be interpreters? If so, under what circumstances?	County policy does not allow minors to be interpreters. One staff interviewee stated that they would allow a minor to be an interpreter and inform the minor to be "mindful" of interpreting appropriately.
Does the County allow the client to provide his or her own interpreter?	Yes, customers may utilize their own interpreters upon request, but this is discouraged. Customers are reminded that free interpretive services are available.
Does the County ensure that the client-provided interpreter understands what is being interpreted for the client?	Yes. Staff interviewed stated they confirm customers' understanding by questioning customers using the interpreter.
If there is not a Release of Confidentiality Information form, how and where is the client-provided interpreter documented?	The County uses a Release of Confidentiality Form for a client-provided interpreter (PA 6181).
Does the County use the CDSS-translated forms in the clients' primary languages?	Yes.

Question: (Please answer yes/no and provide response with comments)	Comments
Is the information that is to be inserted into NOA translated into the client's primary language?	Yes.
If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language?	Yes.
Does the County provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the PUB 13)?	Yes, auxiliary aids and services are available, such as TDD/TTY.
Does the County identify a client with a disability (physical, mental, or learning)?	Customers are greeted by a Navigator at each office's point of entry. Customers can disclose if they have a disability or specific disability-related needs, and if so, there is a warm hand-off to the next available worker located at the accessible counter/booth
Does the County assist clients with self-identifying a disability?	No, the County does not assist customers with self-identifying a disability.
Does the County have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?	Yes, the County has a policy and procedure in place. However, the Reviewers observed there is inconsistency in case handling and in documenting a customer's disability and request for a reasonable accommodation, which may result in an undue delay in providing services.
Does the County offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	Yes, the County offers reasonable accommodations to customers with a disability.
Does the County identify and assist the client who has learning disabilities or a client who cannot read or write?	Yes, the County identifies and assists the customer who has learning disabilities or who cannot read or write.
Does the County offer a screening for learning disabilities?	Yes, in the GAIN program only.
Is there an established process for offering a screening?	Yes.
Is the client identified as having a learning disability referred for an evaluation?	Yes.

B. Corrective Action

Area of Findings	Corrective Actions
Use of Minors	LADPSS 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. Division 21-115.16

Additional Findings:

The Reviewers were provided with an overview of the ADA Hotline and the Reasonable Modification Request database (RMR), which was created to centralize and document ADA Hotline call requests and referrals. ADA Hotline Operators receive reasonable accommodation requests by telephone and create ADA Hotline Call referrals in the RMR, which includes selecting customers' district offices. The RMR then generates an informational email to the district offices' designated ADA Liaison and other designated staff. The ADA Liaison or other designated staff enter information from the RMR-generated email into LRS and contact customers regarding their reasonable accommodation requests. These staff are also expected to flag customers' files in LRS with an International Symbol of Accessibility indicator.

During case reviews, the Reviewers confirmed that the RMR and LRS are separate databases that do not communicate with each other, meaning that RMR and LRS may each contain information about customers, their disabilities, and their disability-related needs, but that information is not transferred or shared between the databases and must be entered, and reviewed for consistency, manually.

The Reviewers assert that this lack of communication may increase the probability that reasonable accommodation requests are overlooked or delayed. The lack of communication between RMR and LRS may also cause interruptions in accommodating customers' disability-related needs, particularly for customers with chronic or permanent disabilities.

Errors in documenting and tracking reasonable accommodations are found in reviewing the RMR and LRS, which the Reviewers believe could be remedied by implementing efforts to ensure the existing databases, RMR and LRS, information is properly noted to ensure continuity of appropriate services to customers with disabilities. The following errors were observed:

1. The LRS disability indicator was not chosen in appropriate cases;
2. ADA notes regarding the reasonable accommodation were unclear or absent due to limited spacing for staff to enter information;

3. Related to (2) above, the lack of documentation does not allow the Reviewer to identify how the reasonable accommodation request was handled by staff (and similarly may be unclear to staff interacting with customers); and

4. Case journal notes were absent, which impedes staffs' ability to clear understand and/or determine the customers' needs.

Recommendation

Documenting a reasonable accommodation request and all subsequent action taken is very important to providing continuous, disability-appropriate service to a customer with a disability. It is equally important for staff to be able to recognize when a reasonable accommodation request has been made and/or is in place for a customer. All staff, particularly public contact staff providing direct service to customers, should be trained and able to recognize a customer's reasonable accommodation request in order to provide assistance without an undue delay. Staff must document all requests for reasonable accommodations and subsequent actions taken by staff in the customer's case (RMR and LRS). Documentation shall include the following information:

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

See All County Letter 19-45.

Access to the RMR is limited to specific staff, which may cause service delays, particularly if one or more designated staff are unavailable. Responding to and/or providing reasonable accommodations may also be delayed if the information is not inputted accurately and in a timely manner. The Reviewers recommend expanding the number of district office staff who are trained and have access to the RMR, in the event designated workers are unavailable.

The Reviewers were informed there are no plans to connect LRS and RMR or to enhance the RMR database. The Reviewers recommend re-evaluating the ADA Hotline and RMR process, and how this interacts with the existing LRS, to ensure customers are provided appropriate, timely, and uninterrupted services.

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

1. Non-Assistance CalFresh

Item	How item is Documented
Ethnic Origin	SAWS 1 and SAWS 2 Application and LRS demographics ethnicity indicator.
Method of identifying client's primary language	SAWS 1 and SAWS 2 Application.
Method of documenting client's primary language	SAWS 1 and SAWS 2 Application, LRS Language indicator, and LRS case journal notes. In five cases, customers requested a change in their preferred verbal language which was noted in the LRS case journal notes. This is inadequate documentation because customers' signatures acknowledging and confirming the change were missing.
Method of providing bilingual services and documentation	LRS Interpreter box indicator and LRS case journal notes. Reviewers found the LRS Interpreter box was not consistently checked by staff. Documentation of providing interpretive services was inconsistent in LRS journal notes in cases selected for review.
Client provided own interpreter	LRS case journal notes, PA 6181.
Method to inform client of potential problem using own interpreter	Verbally inform client and PA 6181.
Release of information to interpreter	PA 6181.
Individuals acceptance or refusal of written material offered in primary language	SAWS 1 and SAWS 2 applications.

Item	How item is Documented
Documentation of minor used as interpreter	No use of minor found in cases selected. However, three staff stated they would allow a minor to be an interpreter in staff questionnaires.
Documentation of circumstance for using minor interpreter temporarily	No use of minor found in cases selected, and no documentation was mentioned in staff responses of the questionnaires.
Method of identifying client's disability	LRS ADA indicator, PUB 2, RMR.
Method of documenting client's disability (physical, mental, or learning)	PUB 2, RMR, LRS ADA indicator, LRS journal notes.
Method of offering a reasonable accommodation to the client with a disability	PUB 2, RMR, LRS ADA indicator and ADA notes.
Method of documenting client's reasonable accommodation	PUB 2, RMR, LRS indicator, LRS journal.

2. Adult Programs (IHSS/APS)

Item	How item is Documented
Ethnic Origin	Case Management, Information, and Payrolling System (CMIPS), application for Social Services (SOC 295)
Method of identifying client's primary language	SOC 295, CMIPS demographics.
Method of documenting client's primary language	SOC 295, CMIPS narrative.
Method of providing bilingual services and documentation	CMIPS narrative.
Client provided own interpreter	PA 6181, CMIPS narrative.
Method to inform client of potential problem using own interpreter	Verbally inform, PA 6181, CMIPS narrative.
Release of information to interpreter	PA 6181.

Item	How item is Documented
Individuals acceptance or refusal of written material offered in primary language	None found in cases selected for review.
Documentation of minor used as interpreter	No minor used in cases selected.
Documentation of circumstance for using minor interpreter temporarily	No minor used in cases selected.
Method of identifying client's disability	IHSS Assessment, CMIPS narrative.
Method of documenting client's disability (physical, mental, or learning)	CMIPS narrative.
Method of offering a reasonable accommodation to the client with a disability	IHSS Assessment, CMIPS narrative.
Method of documenting client's reasonable accommodation	IHSS Assessment, CMIPS narrative.

3. CalWORKs & Employment Services

Item	How item is Documented
Ethnic Origin	SAWS 1 and SAWS 2 Application, LRS.
Method of identifying client's primary language	SAWS 1 and SAWS 2 Application, LRS.
Method of documenting client's primary language	SAWS 1 and SAWS 2 Application, LRS.
Method of providing bilingual services and documentation	LRS journal notes.
Client provided own interpreter	PA 6181.
Method to inform client of potential problem using own interpreter	PA 6181.
Release of information to interpreter	PA 6181.
Individuals acceptance or refusal of written material offered in primary language	None found in cases reviewed.
Documentation of minor used as interpreter	Yes.

Item	How item is Documented
Documentation of circumstance for using minor interpreter temporarily	None found in cases reviewed.
Method of identifying client's disability	PUB 2, RMR, LRS flag indicator.
Method of documenting client's disability (physical, mental, or learning)	PUB 2, RMR, LRS flag indicator, journal notes.
Method of offering a reasonable accommodation to the client with a disability	PUB 2, RMR, LRS flag indicator, journal notes.
Method of documenting client's reasonable accommodation	PUB 2, RMR, LRS flag indicator, journal notes.

4. CAPI Program

Item	How item is Documented
Ethnic Origin	Statement of Facts Cash Assistance Program For Immigrants (SOC 814).
Method of identifying client's primary language	SOC 814.
Method of documenting client's primary language	SOC 814.
Method of providing bilingual services and documentation	LRS journal notes.
Client provided own interpreter	PA 6181.
Method to inform client of potential problem using own interpreter	Verbally and PA 6181.
Release of information to interpreter	PA 6181.
Individuals acceptance or refusal of written material offered in primary language	PA 6181.
Documentation of minor used as interpreter	None found in cases reviewed.
Documentation of circumstance for using minor interpreter temporarily	None found in cases reviewed.
Method of identifying client's disability	SOC 814.

Item	How item is Documented
Method of documenting client's disability (physical, mental, or learning)	PUB 2, RMR, LRS flag indicator, LRS journal notes.
Method of offering a reasonable accommodation to the client with a disability	PUB 2, RMR, LRS flag indicator, LRS journal notes.
Method of documenting client's reasonable accommodation	PUB 2, RMR, LRS flag indicator, LRS journal notes.

5. Fraud

Item	How item is Documented
Ethnic Origin	Fraud Referral Sheet, LRS demographics.
Method of identifying client's primary language	Fraud Referral Sheet, LRS demographics.
Method of documenting client's primary language	Fraud Referral Sheet and Investigative narrative.
Method of providing bilingual services and documentation	Fraud Referral Sheet and Investigative narrative.
Client provided own interpreter	None found in cases reviewed.
Method to inform client of potential problem using own interpreter	None found in cases reviewed.
Release of information to interpreter	None found in cases reviewed.
Individuals acceptance or refusal of written material offered in primary language	None found in cases reviewed.
Documentation of minor used as interpreter	None found in cases reviewed.
Documentation of circumstance for using minor interpreter temporarily	None found in cases reviewed.
Method of identifying client's disability	Fraud Referral Sheet, LRS demographics page ADA indicator.
Method of documenting client's disability (physical, mental, or learning)	Fraud Referral Sheet and Investigative narrative.
Method of offering a reasonable accommodation to the client with a disability	Fraud Referral Sheet and Investigative narrative.

Item	How item is Documented
Method of documenting client's reasonable accommodation	Fraud Referral Sheet and Investigative narrative.

Case Observations

The reviewers found the items listed below were not consistently documented or found in the cases reviewed:

- Use of Release of Confidentiality Form PA 6181
- LRS Interpreter box not marked
- Documentation of Interpretive Services in LRS
- LRS ADA indicator not marked
- Documentation of a customer's disability in LRS
- Method of offering a reasonable accommodation in LRS
- Documentation of customer's reasonable accommodation in LRS

B. Corrective Action

Areas of Action	Corrective Action
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the County Welfare Department (CWD) shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Division 21-116.23
Temporary use of a minor (under 18 years of age) as an interpreter	When a minor (under 18 years of age) is used as an interpreter, the CWD shall so document the circumstances requiring <u>temporary</u> use of minors in the case record. Division 21-116.22 Only under extenuating circumstances or at the specific request of the applicant/recipient shall a CWD allow a minor (under the age of 18 years) to temporarily act as an interpreter.
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Division 21-116.24
Documentation of primary language	Each agency shall ensure that case record identification shows the applicant's/recipient's ethnic origin and primary language. Division 21-201.21

Areas of Action	Corrective Action
Documentation that bilingual services were provided	Document the method used to provide bilingual services, for example, assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Division 21-116.22 Documenting the name of the certified bilingual is suggested as a best practice to demonstrate compliance.
Accessibility to Programs	LADPSS shall ensure that programs and activities are readily accessible to individuals with disabilities. Division 21-111.1
Documentation of a disability	LADPSS shall ensure that the case record is documented upon obtaining information that identifies an applicant/recipient as disabled. LADPSS shall document, in writing, an applicant's/recipient's request for services. Division 21-116.3
General	LADPSS must ensure that proper and consistent documentation is kept in the file that identifies all the required elements to ensure compliance. Division 21-116

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights, cultural awareness, Section 504 of the Rehabilitation Act of 1973 (Section 504), and ADA training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview Questions: (Please answer yes/no and provide response with comments)	Comments
Are employees trained in the requirements of Section 504 and ADA?	Yes, staff stated they received training for both Section 504 and ADA.
Do employees receive continued Division 21 Training?	Yes, staff stated they receive continued training on civil rights.
Do employees understand the County policy regarding a client's rights and procedure to follow when receiving a discrimination complaint?	Yes, staff interviewed stated they were aware of the procedure to follow when a customer wants to file a discrimination complaint.
Does the County provide employees Cultural Awareness Training?	Staff stated they receive various types of training throughout the year and remember Cultural Awareness was included.

Interview Questions: (Please answer yes/no and provide response with comments)	Comments
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	Yes.
Does the County provide training on how to identify clients with disabilities (physical, mental & learning)?	Yes, the County provides training on how to identify customers with disabilities.
Do employees receive training on reasonable accommodation for clients with disabilities?	Yes, employees receive training on reasonable accommodations for customers with disabilities.
Do the employees understand the County policy regarding a client's right to a reasonable accommodation?	Yes.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator's responsibility to maintain this log.

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

Interview and Review Areas: (Please answer yes/no and provide response with comments)	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	Yes, based on staff interviews they were able to identify the difference between complaints.
Do the employees know who the Civil Rights Coordinator is?	No, some staff were unsure who their Civil Rights Coordinator is.
Do the employees know the location of the Civil Rights poster "Everyone is Equal... (PUB 86)" with information as to how and where the clients can file a discrimination complaint?	Yes, all staff were aware of the location for the PUB 86 in the office lobbies.

Interview and Review Areas: (Please answer yes/no and provide response with comments)	Findings
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	Yes.

IX. VENDOR CONTRACTS

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

A. Contracts Review

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

X. CALL CENTER EVALUATION

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

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

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County have a Call Center/Service Center?	Yes, LADPSS has three Customer Service Call Centers.
Is the Call Center/Service Center publicly accessible to clients?	No.
Does the Call Center/Service Center answer calls for the entire County, by district, or regional office?	Each office answers calls for the entire County.
Does the Call/Service Center have an Interactive Voice Response system?	Yes.
If so, does the Interactive Voice Response system have language options for all County threshold languages?	Yes, in all LADPSS threshold languages.

Question: (Please answer yes/no and provide response with comments)	Comments
Does the Interactive Voice Response system have an option to request free interpretive services?	Yes.
Is the Call/Service Center accessible to clients with a disability (hearing impaired, physical, mental, or learning)?	Yes, the County has TTY/TDD and also works with California Relay for the hearing impaired. Customers with a disability can request a reasonable accommodation.
Does the Call/Service Center accommodate clients with a disability (physical, mental, or learning)?	LADPSS has a policy to assist customers with disabilities by working with the district offices' Civil Rights Liaisons to serve as the ADA Liaison at each LADPSS office and coordinate reasonable accommodations. CSC staff also provide direct referrals via telephone to the ADA Hotline operator.
Are the Call/Service Center calls monitored for quality assurance?	Yes.
Does the Call/Service Center staff provide services to client's individual case?	Yes. Call Center staff provide services to customers' individual cases.
Does the Call/Service Center staff identify and document the client's preferred language?	Yes, staff will identify and document customers' preferred language.
Does the Call/Service Center staff document the method of providing bilingual interpretive services?	Yes, staff document in LRS journal the method of providing bilingual interpretive services.

B. Corrective Action

None.

XI. COMMUNITY INPUT

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

A. Advocate Major Concerns:

1. Call/Service Center
 - a. Barriers to Self-Service Authentication: Less than half of all calls entering the Interactive Voice Response (IVR) phone self-service are properly authenticated and calls are disconnected.
 - b. There is a high call volume and barriers to leaving messages. The County is unable to service callers and callers are asked to call back later (there is no customer call-back feature).
 - c. There is a high number of delinquent tickets and/or delayed timelines for resolutions to callers' issues.
2. Incorrect application of the Language Preference Policies.
3. Reduced Joint Dialogue Meetings between LADPSS staff and advocates.

LADPSS states they are working to resolve the above observations and issues raised in Joint Dialogue meetings and will continue to collaborate with advocates.

XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The LADPSS Civil Rights Compliance Plan for the period July 1, 2018 through June 30, 2019, was received on May 8, 2018. It is approved as submitted.

XIII. CONCLUSION

The CDSS Reviewers found LADPSS staff warm, welcoming, informative and very supportive. Particular thanks to Sheila Early, Luis Basurto, and Ricardo Castaneda from the Management Information and Evaluation Section and Charles Palmer and Jessica Alfaro, from the Civil Rights Unit for organizing the details of the review. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the LADPSS in partial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The LADPSS must remedy the deficiencies identified in this report by taking corrective actions. A CAP must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is CDSS' intent that this report be used to create a positive interaction between the County and CDSS to identify and correct compliance violations and to provide the County with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights Unit staff is available to provide technical assistance as requested.