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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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GAVIN NEWSOM
GOVERNOR

November 13, 2019

Connie Beck, Director
Humboldt County Department of Health & Human Services
507 F Street
Eureka, CA 95501

Dear Ms. Beck:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of March 25 through March 29, 2019. 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 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>

If you need technical assistance in the development of your CAP, please feel free to contact James Urquizo at (916) 654-2101. You may also contact us via Civil Rights Unit e-mail: crb@dss.ca.gov.

Sincerely,

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

Enclosure

c: Yvonne Winter, Civil Rights Coordinator

Alexis Fernandez, Chief
CalFresh Branch

Tami Gutierrez, Chief
CalFresh Operations Bureau

Alexis Fernandez, Chief
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Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier
Western Center on Law and Poverty

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR**

**Humboldt County Department of
Health & Human Services**

Conducted on

March 25 through March 29, 2019

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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(916) 654-2107

Reviewer: James Urquizo

TABLE OF CONTENTS

- I. INTRODUCTION**
- II. SUMMARY OF METHODOLOGY**
- III. DISSEMINATION OF INFORMATION**
- IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**
- V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE
NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**
- VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**
- VII. STAFF DEVELOPMENT AND TRAINING**
- VIII. DISCRIMINATION COMPLAINT PROCEDURES**
- IX. VENDOR CONTRACTS**
- X. CALL CENTER EVALUATION**
- XI. COMMUNITY INPUT**
- XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL**
- XIII. CONCLUSION**

I. INTRODUCTION

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

An on-site compliance review was conducted on March 25-29, 2019. An exit interview was held on March 29, 2019, 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)
Garberville, CA	727 Cedar St, Garberville, CA	Eligibility	None
Eureka, CA	2440 6th Street, Eureka, CA	Children Family Services (CPS)	None
Eureka, CA	231 2 nd Street, Eureka, CA	Children Welfare Services Visitation Center	None
Eureka, CA	808 E. Street, Eureka, CA	Adult / In Home Support Services	None
Eureka, CA	605 K. Street, Eureka, CA	Hearings	None
Eureka, CA	445 West Washington, Eureka, CA	CalWORKs	None

II. SUMMARY OF METHODOLOGY

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

- Reviewed the **2019-2020** Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the County.

Headquarters and on-site review procedures included:

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

Butler Valley Disability Services
4635 Broadway Eureka, CA
(707) 442-2451

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

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

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

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	10	0
Children Social Workers	10	0
Adult Program Workers	10	0
In Home Support Services Workers	10	0
Calworks	10	0
Receptionist/Screeners	5	0
Total	55	0

No additional interviews were scheduled.

Civil Rights Coordinator and Program Manager Surveys

Number of surveys distributed: 7

Number of surveys received: 7

Reviewed Case Files

English speakers' case files reviewed: 75

Non-English or limited-English speakers' case files reviewed: 6

Languages of clients' cases: English, Spanish

Reasonable Accommodation cases reviewed: 10

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, clients are able to mail application(s) and documents necessary to complete services, and setup appointments for after-hours services.

Question (Please answer yes/no and provide response with comments.)	Comments
Can clients, including those with disabilities, access services when they are unable to go to the office?	Yes, online services are available for clients to use after-hours and when they are unable to go to the office.
Does the County ensure the awareness of available services individuals in remote areas?	Yes, the County has informational outreach programs to reach all individuals in remote areas.

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 13-8/16)?	Yes, PUB 13's are available to all clients in the lobby and other languages behind the counter.
Is the pamphlet distributed and explained to each client at intake and re-certification?	Yes, at intake all clients are briefed using the PUB 13 and handed the brochure. The PUB 13 is also mailed to those clients that cannot pick up the PUB 13 at the office.
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?	No, not all receptionists are aware of where to obtain PUB 13's in other languages on the CDSS website.
Were the current versions of the required posters present in the lobbies?	Yes, current versions of the required posters were available and visibly posted, including: And Justice for All (Form 475B) Everyone is Different, but Equal under the Law (PUB 86)(Revised 03/07, with current Civil Rights Coordinator contact information)
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non- English-speaking clients translated into appropriate languages?	Yes, instructional and directional signs are well posted in lobby areas for clients to utilize.

- C. Corrective Actions:** The County must ensure all office staff are aware of where to obtain the PUB 13 in languages other than English.
- D. Recommendation:** The County should train all office staff on where to locate PUB 13s in languages other than English, as well as provide periodic reminders to existing office staff.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

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

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

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

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

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

A. Findings and Corrective Actions

1. Facility Location: 727 Cedar Street, Garberville

Facility Element/Finding	Corrective Action
<u>Parking:</u> Unauthorized Parking Sign	An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8)

Facility Element/Finding	Corrective Action
<p>Parking sign at street entry to ADA parking missing</p>	<p>The additional sign shall not be less than 17 inches wide by 22 inches high. (CA T24 11B-502.8.1)</p> <p>The additional sign shall clearly state in letters with a minimum height of 1 inch the following: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____." (CA T24 11B-502.8.2)</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2)</p>
<p><u>Parking: Disabled Parking Signs</u></p> <p>One (1) disabled parking sign does not have the correct "Minimum Fine" sign.</p>	<p>Additional language or an additional sign below the International Symbol of Accessibility (ISA) shall state Minimum Fine \$250. (CA T24 11B-502.6.2) CARM page 158</p>
<p><u>Parking: Wheel Stops</u></p> <p>Disabled parking spots missing two cement bumpers.</p>	<p>A curb or wheel stop shall be provided if required to prevent encroachment of vehicles over the required clear width of adjacent accessible routes. (CA T24 11B-502.7.2) CARM page 172</p>
<p><u>Parking: Disabled Parking Spaces</u></p> <p>All disabled parking spaces and aisles require repaving and to be re-painted.</p>	<p>The parking space shall be marked with an ISA sign, in white on a blue background - a minimum 36 inches wide by 36 inches high. (CA T24 11B-502.6.4.1)</p> <p style="text-align: center;"><u>OR</u></p> <p>...in white or a suitable contrasting color (CA T24 11B-502.6.4.2)</p> <p>The centerline of the International Symbol of Accessibility shall be a maximum of 6 inches from the centerline of the parking space, its sides parallel to the length of the parking space and its lower corner at, or</p>

Facility Element/Finding	Corrective Action
	<p>lower side aligned with, the end of the parking space length. (CA T24 11B-502.6.4.2)</p> <p>The words "NO PARKING" shall be painted on the surface each access aisle. (CA T24 11B-502.3.3)</p> <p>This notice shall be painted in white letters a minimum of 12 inches in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3)</p> <p>Access aisles shall be marked with a blue painted borderline around their perimeter. (CA T24 11B-502.3.3) (ADA 502.3.3)</p> <p>The words NO PARKING shall be painted on the surface each access aisle. (CA T24 11B-502.3.3) CARM page 166</p> <p>This notice shall be painted in white letters a minimum of 12 inches in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3) CARM page 166</p> <p>Access aisles shall be marked with a blue painted borderline around their perimeter. (CA T24 11B-502.3.3) (ADA 502.3.3) CARM page 164</p> <p>The area within the blue borderlines shall be marked with hatched lines a maximum of 36 inches on center in a color contrasting with that of the aisle surface, preferably blue or white. (CA T24 11B-502.3.3) CARM page 164</p>
<p>Parking: Disabled Parking Access Aisles</p> <p>Trash collection bin is in the path of the disabled access aisle</p>	<p>Parking space minimum dimensions: 9 feet wide by 18 feet long. Figure 9. (CA T24 11B-502.2) (ADA 502.2) CARM page 166</p> <p>Access aisle minimum dimensions: 5 feet wide by 18 feet long. Figure 9. (CA T24 11B-502.3.1) (ADA 502.3) CARM page 166</p> <p>Access aisles shall adjoin an accessible route. (CA T24 11B-502.3) (ADA 502.3) CARM page 166</p>

Facility Element/Finding	Corrective Action
	<p>Two (2) parking spaces shall be permitted to share a common access aisle. (CA T24 11B-502.3) (ADA 502.3) CARM page 166 & 167</p> <p>Access aisles serving car and van parking spaces shall be 5 feet wide minimum. (CA T24 11B-502.3.1) (ADA 502.3.1) CARM page 173</p> <p>Access aisles shall extend the full required length of the parking spaces they serve. (CA T24 11B-502.3.2) (ADA 502.3.2) CARM page 167</p>
<p><u>Women's Restroom:</u> Changing Table</p> <p>Women's restroom changing table is too high at 42 inches at working level.</p>	<p>Baby changing table shall comply with Sections 11B-309 and 11B-902. (CA T24 11B-226.4) CARM page 317</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) CARM page 316</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) CARM page 317</p> <p>Baby changing tables shall not be located in toilet compartments complying with Section 11B-604.8.</p>
<p><u>Men's Restroom:</u> Baby Changing Table</p> <p>There is no baby changing table in Men's Restroom.</p>	<p>Baby changing table shall comply with Sections 11B-309 and 11B-902. (CA T24 11B-226.4) CARM page 317</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) CARM page 316</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) CARM page 317</p> <p>Baby changing tables shall not be located in toilet compartments complying with Section 11B-604.8.</p>

Facility Element/Finding	Corrective Action
<p><u>Client Interview Rooms and Booths</u></p> <p>Room 102 Interview Room does not have a five foot turning diameter.</p>	<p>Where the accessible route makes a 180 degree turn around an element which is less than 48 inches wide, clear width shall be 42 inches minimum approaching the turn, 48 inches minimum at the turn and 42 inches minimum leaving the turn. (CA T24 11B-403.5.2) (ADA 403.5.2) CARM page 212</p> <p>The turning space shall be a space of 60 inches diameter minimum. (CA T24 11B-304.3.1) (ADA 304.3.1) CARM page 306</p> <p>The turning space shall be a T-shaped space within 60 inches by 60 inches minimum square with arms and base 36 inches wide minimum. (CA T24 11B-304.3.2) CARM page 306</p>
<p><u>Client Interview Rooms and Booths</u></p> <p>Room 102 Interview Room has a client table that is too short in depth</p>	<p>Where knee clearance is required under an element as part of a clear floor space, the knee clearance shall be 11 inches minimum deep at 9 inches above the finish floor or ground and 8 inches minimum deep at 27 inches above the finish floor or ground. (CA T24 11B-306.3.3) (ADA 306.3.3) CARM page 305</p> <p>Knee clearance shall be 30 inches minimum wide. (CA T24 11B-306.3.5) (ADA 306.3.5) CARM page 305</p>
<p><u>Client Interview Rooms</u></p> <p>Disabled interview and conference rooms missing disabled signage at entry to room.</p>	<p>Installation height above finished floor shall be 40 inches maximum. (CA T24 11B-703.5) (ADA 703.5)</p>
<p><u>Parking: Safe path of travel</u></p> <p>Path of travel to sidewalk is not smooth and paved to the front entrance.</p>	<p>Floor and ground surfaces shall be stable, firm, and slip resistant. (CA T24 11B-302.1) (ADA 302.1) CARM page 210</p>

a. Corrective Actions: Refer to Corrective Action column above (Section A, 1).

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

2. **Facility Location: 2440 6th Street, Eureka**

Facility Element/Finding	Corrective Action
<p><u>Parking Signage</u></p> <p>Ten (10) disabled parking signs are missing the additional language sign "Minimum Fine \$250"</p>	<p>Additional language or an additional sign below the ISA shall state Minimum Fine \$250. (CA T24 11B-502.6.2) CARM page 158</p>
<p><u>Parking: Van-accessible signage mounted below ISA</u></p> <p>Two (2) disabled parking sign is missing the required Van Accessible signage mounted below the ISA.</p>	<p>Signs identifying van parking spaces shall contain additional language or an additional sign with the designation Van Accessible. (CA T24 11B-502.6) (ADA 502.6) CARM page 158</p>
<p><u>Parking: Access aisles</u></p> <p>Ten (10) disabled parking spaces do not have an access aisle painted on the parking floor with access to the sidewalk and to the front of the building.</p>	<p>Access aisle minimum dimensions: 5 feet wide by 18 feet long. (CA T24 11B-502.3.1) (ADA 502.3) CARM page 166</p> <p>Access aisles shall adjoin an accessible route. (CA T24 11B-502.3) (ADA 502.3) CARM page 166</p> <p>Two parking spaces shall be permitted to share a common access aisle. (CA T24 11B-502.3) (ADA 502.3) CARM page 166-167</p> <p>Access aisles serving car and van parking spaces shall be 5 feet wide minimum. (CA T24 11B-502.3.1) (ADA 502.3.1) CARM page 173</p>
<p><u>Parking: Directional signage</u></p> <p>Directional signs are not posted and visible to accessible entrance</p>	<p>Directional signs complying with Visual Characters heading in Section 63 (11B-703.5), <i>Signs & Identification</i>, including the ISA complying with "International Symbol of Accessibility" heading in Section 63 (11B-703.7.2.1), <i>Signs & Identification</i>, indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the</p>

Facility Element/Finding	Corrective Action
	<p>accessible route diverges from the regular circulation path. (CA T24 11B-216.6) CARM page 135</p> <p>Visual characters shall be 40 inches minimum above the finish floor or ground. (CA T24 11B-703.5.6) (ADA 703.5.6) CARM page 449</p>
<p><u>Parking: Unauthorized Parking Signage</u></p> <p>Two (2) unauthorized parking signs missing at entry to parking lot</p>	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8) CARM page 159</p> <p>The additional sign shall not be less than 17 inches wide by 22 inches high. (CA T24 11B-502.8.1) CARM page 159</p> <p>The additional sign shall clearly state in letters with a minimum height of 1 inch the following: Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____. (CA T24 11B-502.8.2) CARM page 159</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) CARM page 159</p>
<p><u>Main or Alternate Entrance: Accessible signage</u></p> <p>ISA sign missing at entry to the front of the building</p>	<p>In existing buildings and facilities where not all entrances comply with Section 28 (11B-404), <i>Doors, Doorways and Gates</i>, entrances complying with Section 28, <i>Doors, Doorways and Gates</i> shall be identified by the ISA complying with "International Symbol of Accessibility" heading in Section 63 (11B-703.7.2.1), <i>Signs & Identification</i>. (CA T24 11B-216.6) (ADA 216.6) CARM page 135</p> <p>Pictograms and their field shall have a non-glare finish. (CA T24 11B-703.6.2) (ADA 703.6.2) CARM page 450</p>

Facility Element/Finding	Corrective Action
	<p>Pictograms shall contrast with their field with either a light pictogram on a dark field or a dark pictogram on a light field. (CA T24 11B-703.6.2) (ADA 703.6.2) CARM page 450</p>
<p><u>Porta Potty Restroom:</u> Accessible Signage</p> <p>Outdoor Porta Potty structure is missing ISA sign</p>	<p>Restroom toilet and bathing facilities shall be identified by a circle, triangle or both, ¼ inches thick and 12 inches in diameter. (CA T24 11B-703.7.2.6.2) CARM page 376</p> <p>The ISA shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol. (CA T24 11B-703.7.2.6) CARM page 376</p> <p>Where a door is provided the ISA shall be mounted within 1 inches of the vertical centerline of the door. (CA T24 11B-703.7.2.6) CARM page 376</p> <p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. (CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</p>
<p><u>Outdoor Porta Potty Restroom</u></p> <p>Outdoor Porta Potty structure does not have a 5 foot turnaround.</p>	<p>Where the accessible route makes a 180 degree turn around an element which is less than 48 inches wide, clear width shall be 42 inches minimum approaching the turn, 48 inches minimum at the turn and 42 inches minimum leaving the turn. (CA T24 11B-403.5.2) (ADA 403.5.2) CARM page 212</p> <p>The turning space shall be a space of 60 inches diameter minimum. (CA T24 11B-304.3.1) (ADA 304.3.1) CARM page 306</p> <p>The turning space shall be a T-shaped space within 60 inches by 60 inches minimum square with arms and base 36 inches wide minimum. (CA T24 11B-304.3.2) CARM page 306</p>
<p><u>Porta Potty Restroom:</u> Safe path of travel</p> <p>Outdoor Porta Potty structure is located approximately 3</p>	<p>Floor and ground surfaces shall be stable, firm, and slip resistant. (CA T24 11B-302.1) (ADA 302.1) CARM page 210</p>

Facility Element/Finding	Corrective Action
feet from the sidewalk on top of a wood chip layer. A person in a wheelchair would have difficulty accessing the Porta Potty from the sidewalk.	

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

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

3. **Facility Location: 231 2nd Street, Eureka**

Facility Element/Finding	Corrective Action
<p><u>Main or Alternate Entrance:</u> Accessible signage</p> <p>ISA sign missing at entry to the front of the building</p>	<p>In existing buildings and facilities where not all entrances comply with Section 28 (11B-404), <i>Doors, Doorways and Gates</i>, entrances complying with Section 28, <i>Doors, Doorways and Gates</i> shall be identified by the ISA complying with "International Symbol of Accessibility" heading in Section 63 (11B-703.7.2.1), <i>Signs & Identification</i>. (CA T24 11B-216.6) (ADA 216.6) CARM page 35</p> <p>Pictograms and their field shall have a non-glare finish. (CA T24 11B-703.6.2) (ADA 703.6.2) CARM page 450</p> <p>Pictograms shall contrast with their field with either a light pictogram on a dark field or a dark pictogram on a light field. (CA T24 11B-703.6.2) (ADA 703.6.2) CARM page 450</p>
<p><u>Unisex Restroom: Pipes under sink securely insulated</u></p> <p>Two (2) unisex restroom basin drain pipes are not insulated and wrapped.</p>	<p>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) CARM page 372</p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks. (CA T24 11B-606.5) (ADA 606.5) CARM page 372</p>

Facility Element/Finding	Corrective Action
<p><u>Unisex Restroom:</u> <u>Accessible Signage.</u></p> <p>Two (2) Unisex Restrooms missing proper signage on the doors.</p>	<p>Unisex toilet and bathing facilities shall be identified by a circle, ¼ inches thick and 12 inches in diameter with a ¼ inches thick triangle with a vertex pointing upward superimposed on the circle and within the 12 inches diameter. (CA T24 11B-703.7.2.6.3) CARM page 376</p> <p>The triangle symbol shall contrast with the circle symbol, either light on a dark background or dark on a light background. (CA T24 11B-703.7.2.6.3) CARM page 377</p> <p>The circle symbol shall contrast with the door, either light on a dark background or dark on a light background. (CA T24 11B-703.7.2.6.3) CARM page 377</p> <p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. (CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</p>
<p><u>Client Interview Rooms & Booth</u></p> <p>Four (4) visitation rooms do not have a 5 foot turnabout.</p>	<p>Where the accessible route makes a 180 degree turn around an element which is less than 48 inches wide, clear width shall be 42 inches minimum approaching the turn, 48 inches minimum at the turn and 42 inches minimum leaving the turn. (CA T24 11B-403.5.2) (ADA 403.5.2) CARM page 212</p> <p>The turning space shall be a space of 60 inches diameter minimum. (CA T24 11B-304.3.1) (ADA 304.3.1) CARM page 306</p> <p>The turning space shall be a T-shaped space within 60 inches by 60 inches minimum square with arms and base 36 inches wide minimum. (CA T24 11B-304.3.2) CARM page 306</p>

a. Corrective Actions: Refer to Corrective Action column above (Section A, 3).

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

4. Facility Location: 808 E Street, Eureka

Facility Element/Finding	Corrective Action
<p><u>Parking: Access Aisles</u></p> <p>All disabled parking and access aisles require re-painting.</p>	<p>The parking space shall be marked with an International Symbol of Accessibility...in white on a blue background - a minimum 36 inches wide by 36 inches high. (CA T24 11B-502.6.4.1) CARM page 169</p> <p style="text-align: center;"><u>OR</u></p> <p>...in white or a suitable contrasting color (CA T24 11B-502.6.4.2) CARM page 169</p> <p>The centerline of the International Symbol of Accessibility shall be a maximum of 6 inches from the centerline of the parking space, its sides parallel to the length of the parking space and its lower corner at, or lower side aligned with, the end of the parking space length. (CA T24 11B-502.6.4.2) CARM page 169</p> <p>The words "NO PARKING" shall be painted on the surface each access aisle. (CA T24 11B-502.3.3) CARM page 176</p> <p>This notice shall be painted in white letters a minimum of 12 inches in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3) CARM page 176</p> <p>Access aisles shall be marked with a blue painted borderline around their perimeter. (CA T24 11B-502.3.3) (ADA 502.3.3) CARM page 176</p> <p>The area within the blue borderlines shall be marked with hatched lines a maximum of 36 inches on center in a color contrasting with that of the aisle surface, preferably blue or white. (CA T24 11B-502.3.3) CARM page 176</p>
<p><u>Client Interview Room and Booths</u></p> <p>Room 127 Interview Room is missing an ISA sign at entry</p>	<p>Installation height above finished floor shall be 40 inches maximum. (CA T24 11B-703.5) (ADA 703.5) CARM page 455</p>

Facility Element/Finding	Corrective Action
to the room, and the table in the room is short in depth.	<p>Where knee clearance is required under an element as part of a clear floor space, the knee clearance shall be 11 inches minimum deep at 9 inches above the finish floor or ground and 8 inches minimum deep at 27 inches above the finish floor or ground. (CA T24 11B-306.3.3) (ADA 306.3.3) CARM page 216</p> <p>Knee clearance shall be 30 inches minimum wide. (CA T24 11B-306.3.5) (ADA 306.3.5) CARM page 216</p> <p>Where the accessible route makes a 180 degree turn around an element which is less than 48 inches wide, clear width shall be 42 inches minimum approaching the turn, 48 inches minimum at the turn and 42 inches minimum leaving the turn. (CA T24 11B-403.5.2) (ADA 403.5.2) CARM page 212</p> <p>The turning space shall be a space of 60 inches diameter minimum. (CA T24 11B-304.3.1) (ADA 304.3.1) CARM page 306</p> <p>The turning space shall be a T-shaped space within 60 inches by 60 inches minimum square with arms and base 36 inches wide minimum. (CA T24 11B-304.3.2) CARM page 306</p>
<p><u>Client Interview Room and Booths</u></p> <p>Room 125 Conference Room is missing an ISA sign missing at entry to room and at designated table location</p>	<p>Installation height above finished floor shall be 40 inches maximum. (CA T24 11B-703.5) (ADA 703.5) CARM page 455</p> <p>Pictograms and their field shall have a non-glare finish. (CA T24 11B-703.6.2) (ADA 703.6.2) CARM page 376</p> <p>Pictograms shall contrast with their field with either a light pictogram on a dark field or a dark pictogram on a light field. (CA T24 11B-703.6.2) (ADA 703.6.2) CARM page 376</p>
<p><u>Men's Restroom: Door Signage</u></p> <p>Men's Restroom door sign missing wording "men" in raised lettering.</p>	<p>Men's toilet and bathing facilities shall be identified by an equilateral triangle, ¼ inch thick with edges 12 inches long and a vertex pointing upward. (CA T24 11B-703.7.2.6.1) CARM page 310</p>

Facility Element/Finding	Corrective Action
	<p>The triangle symbol shall contrast with the door, either light on a dark background or dark on a light background. (CA T24 11B-703.7.2.6.1) CARM page 310</p> <p>The symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol. (CA T24 11B-703.7.2.6) CARM page 310</p> <p>Where a door is provided the symbol shall be mounted within 1 inch of the vertical centerline of the door. (CA T24 11B-703.7.2.6) CARM page 310</p> <p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. (CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 311</p>
<p><u>Women's Restroom: Door Signage</u></p> <p>Women's Restroom door sign missing wording "women" in raised lettering.</p>	<p>Women's toilet and bathing facilities shall be identified by a circle, ¼ inch thick and 12 inches in diameter. (CA T24 11B-703.7.2.6.2) CARM page 310</p> <p>The circle symbol shall contrast with the door, either light on a dark background or dark on a light background. (CA T24 11B-703.7.2.6.2) CARM page 310</p> <p>The symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol. (CA T24 11B-703.7.2.6) CARM page 310</p> <p>Where a door is provided the symbol shall be mounted within 1 inch of the vertical centerline of the door. (CA T24 11B-703.7.2.6) CARM page 310</p> <p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. (CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 311</p>

a. Corrective Actions: Refer to Corrective Action column above (Section A, 4).

- b. **Recommendations:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 4).

5. **Facility Location: 605 K Street, Eureka**

Facility Element/Finding	Corrective Action
<p><u>Parking</u></p> <p>Clients who use wheelchairs must travel behind nine (9) vehicle parking spaces to access two (2) disabled parking spaces.</p>	<p>Parking spaces and access aisles shall be designed so that persons using them are not required to travel behind parking spaces other than to pass behind the parking space in which they parked. (CA T24 11B-502.7.1) CARM page 172</p>
<p><u>Parking</u></p> <p>Two (2) disabled parking spaces do not have an access aisle painted on the parking floor with access to the sidewalk and to the front of the building.</p>	<p>Access aisle minimum dimensions: 5 feet wide by 18 feet long. (CA T24 11B-502.3.1) (ADA 502.3) CARM page 166</p> <p>Access aisles shall adjoin an accessible route. (CA T24 11B-502.3) (ADA 502.3) CARM page 166</p> <p>Two parking spaces shall be permitted to share a common access aisle. (CA T24 11B-502.3) (ADA 502.3) CARM page 166 & 167</p> <p>Access aisles serving car and van parking spaces shall be 5 feet wide minimum. (CA T24 11B-502.3.1) (ADA 502.3.1) CARM page 173</p> <p>Access aisles shall extend the full required length of the parking spaces they serve. (CA T24 11B-502.3.2) (ADA 502.3.2) CARM page 167</p>
<p><u>Main Entrance: Directional Signage</u></p> <p>Directional signs on the building exterior are needed to guide wheelchair users to the front entrance.</p>	<p>Directional signs complying with "Visual Characters" heading in Section 57, <i>Signs & Identification</i>, including the ISA complying with "International Symbol of Accessibility" heading in Section 57, <i>Signs & Identification</i>, indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path. (CA T24 11B-216.6) CARM page 28</p>

Facility Element/Finding	Corrective Action
	Visual characters shall be 40 inches minimum above the finish floor or ground. (CA T24 11B-703.5.6) (ADA 703.5.6) CARM page 376
<p><u>Client Interview Rooms & Booths: Signage</u></p> <p>Room 104, Fair Hearings Conference room does not have an ISA sign at entry to room or at the designated table.</p>	<p>Directional signs complying with “Visual Characters” heading in Section 57, Signs & Identification, including the ISA complying with “International Symbol of Accessibility” heading in Section 57, Signs & Identification, indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path. (CA T24 11B-216.6) CARM page 28</p> <p>Visual characters shall be 40 inches minimum above the finish floor or ground. (CA T24 11B-703.5.6) (ADA 703.5.6) CARM page 376</p>
<p><u>Client Interview Rooms & Booths: Signage</u></p> <p>Room 101 is missing an ISA at the designated table.</p>	<p>Directional signs complying with “Visual Characters” heading in Section 57, Signs & Identification, including the ISA complying with “International Symbol of Accessibility” heading in Section 57, Signs & Identification, indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path. (CA T24 11B-216.6) CARM page 28</p> <p>Visual characters shall be 40 inches minimum above the finish floor or ground. (CA T24 11B-703.5.6) (ADA 703.5.6) CARM page 376</p>
<p><u>Client Interview Rooms & Booths</u></p> <p>Room 112 lacks the appropriate unrestricted five-foot turning diameter.</p>	<p>Where the accessible route makes a 180 degree turn around an element which is less than 48 inches wide, clear width shall be 42 inches minimum approaching the turn, 48 inches minimum at the turn and 42 inches minimum leaving the turn. (CA T24 11B-403.5.2) (ADA 403.5.2) CARM page 212</p> <p>The turning space shall be a space of 60 inches diameter minimum. (CA T24 11B-304.3.1) (ADA 304.3.1) CARM page 306</p>

Facility Element/Finding	Corrective Action
	<p>The turning space shall be a T-shaped space within 60 inches by 60 inches minimum square with arms and base 36 inches wide minimum. (CA T24 11B-304.3.2) CARM page 306</p>
<p><u>Men's Restroom: Door Signage</u></p> <p>Men's Restroom ISA sign does not have the word Men's on the sign.</p>	<p>Men's toilet and bathing facilities shall be identified by an equilateral triangle, ¼ inch thick with edges 12 inches long and a vertex pointing upward. (CA T24 11B-703.7.2.6.1) CARM page 376</p> <p>The triangle symbol shall contrast with the door, either light on a dark background or dark on a light background. (CA T24 11B-703.7.2.6.1) CARM page 376</p> <p>The symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol. (CA T24 11B-703.7.2.6) CARM page 376</p> <p>Where a door is provided the symbol shall be mounted within 1 inches of the vertical centerline of the door. (CA T24 11B-703.7.2.6) CARM page 376</p>
<p><u>Women's Restroom: Door Signage</u></p> <p>Women's Restroom International ISA sign does not have the word Women's on the sign.</p>	<p>Women's toilet and bathing facilities shall be identified by a circle, ¼ inch thick and 12 inches in diameter. (CA T24 11B-703.7.2.6.2) CARM page 376</p> <p>The circle symbol shall contrast with the door, either light on a dark background or dark on a light background. (CA T24 11B-703.7.2.6.2) CARM page 376</p> <p>The symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol. (CA T24 11B-703.7.2.6) CARM page 376</p> <p>Where a door is provided the symbol shall be mounted within 1 inches of the vertical centerline of the door. (CA T24 11B-703.7.2.6) CARM page 376</p>

Facility Element/Finding	Corrective Action
<p><u>Women's Restroom</u></p> <p>Women's Restroom has three (3) restroom basin drain pipes that are not insulated and wrapped securely.</p>	<p>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) CARM page 372</p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks. (CA T24 11B-606.5) (ADA 606.5) CARM page 372</p>

a. **Corrective Actions:** Refer to Corrective Action column above (Section A, 5).

b. **Recommendations:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 5).

6. **Facility Location: 445 West Washington, Eureka**

Facility Element/Finding	Corrective Action
<p><u>Main or Alternate Entrance: Accessible signage</u></p> <p>ISA sign missing at entry to the front of the building</p>	<p>In existing buildings and facilities where not all entrances comply with Section 28 (11B-404), <i>Doors, Doorways and Gates</i>, entrances complying with Section 28, <i>Doors, Doorways and Gates</i> shall be identified by the ISA complying with "International Symbol of Accessibility" heading in Section 63 (11B-703.7.2.1), <i>Signs & Identification</i>. (CA T24 11B-216.6) (ADA 216.6) CARM page 35</p> <p>Pictograms and their field shall have a non-glare finish. (CA T24 11B-703.6.2) (ADA 703.6.2) CARM page 450</p> <p>Pictograms shall contrast with their field with either a light pictogram on a dark field or a dark pictogram on a light field. (CA T24 11B-703.6.2) (ADA 703.6.2) CARM page 450</p>
<p><u>Men's Restroom: Accessible Signage</u></p> <p>Men's Restroom ISA sign does not display correct wheelchair symbol</p>	<p>The symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol. (CA T24 11B-703.7.2.6) CARM page 376</p>

Facility Element/Finding	Corrective Action
	<p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. (CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</p> <p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall. (CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</p>
<p><u>Men's Restroom</u></p> <p>Men's Restroom basin drain pipes are not insulated and wrapped securely.</p>	<p>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) CARM page 372</p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks. (CA T24 11B-606.5) (ADA 606.5) CARM page 372</p> <p>Operable parts shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. (CA T24 11B-309.4) (ADA 309.4) CARM page 372</p>
<p><u>Women's Restroom</u></p> <p>Women's Restroom ISA sign does not have braille display with wheelchair symbol</p>	<p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. (CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 447</p> <p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall. (CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 447</p>
<p><u>Women's Restroom</u></p> <p>Women's restroom basin drain pipes are not insulated and wrapped securely.</p>	<p>There shall be no sharp or abrasive surfaces under lavatories and sinks. (CA T24 11B-606.5) (ADA 606.5) CARM page 372</p> <p>Operable parts shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. (CA T24 11B-309.4) (ADA 309.4) CARM page 372</p>

- a. **Corrective Actions:** Refer to Corrective Action column above (Section A, 6).
- b. **Recommendations:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 6).

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?	Yes, the County identifies a client's language requirements on first contact by asking the client about language preference during the first interview.

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County use a primary language form?	Yes, a primary language form is used.
Does the client self-declare on this form?	Yes, clients are able to self-declare on the required form.
Are non-English- or limited- English-speaking clients provided bilingual services?	Yes, non-English- or limited- English-speaking clients are provided bilingual services.
After it has been determined that the client is limited-English or non-English speaking, is there a County process for procuring an interpreter?	Yes, the County utilizes interpretive services when needed by either using in-house or telephonic interpretive services.
Does the County have a contracted language line provider, a county interpreter list, or any other interpreter process?	Yes, the County has Language Line as the contracted language line provider and a County interpreter list.
Is there a delay in providing interpretive services?	Yes. Interpretive services are provided quickly and efficiently in a reasonable amount of time.
Are County interpreters certified?	Yes, County interpreters are certified.
Does the County have adequate interpreter services?	Yes, the County has adequate interpreter services.
Does the County allow minors to be interpreters? If so, under what circumstances?	No, the County does not allow minors under the age of 18 to be interpreters.
Does the County allow the client to provide his or her own interpreter?	Under certain circumstances a client can bring their own interpreter, but they are advised about possible misinformation of services.
Does the County ensure that the client-provided interpreter understands what is being interpreted for the client?	Yes, a client can bring their own interpreter, and County staff advises clients about possible misinformation about services. The County does not undertake any other action to ensure interpreter understanding.
If there is not a Release of Confidentiality Information form, how and where is the client-provided interpreter documented?	Yes, during interviews a Release of Confidentiality Information form is given to the client and explained verbally to the client.

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County use the CDSS-translated forms in the clients' primary languages?	Yes, the County is aware and does use the CDSS-translated forms in the clients' primary languages. They are aware of where to find them.
Is the information that is to be inserted into NOA translated into the client's primary language?	Yes, information inserted into the NOA is translated into the client's primary language and inserted into documents. The County sends out NOA's in the client's primary language also.
If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language?	Yes, when there is no available translated language, staff will work to have the information translated by a qualified translator and incorporate the translated language into the provided documents. The information on the form is also explained to the client.
Does the County provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	Yes, the County is aware of auxiliary services and receptionists at all offices are aware of where to obtain these services to assist persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, and/or large print materials.
Does the County identify a client with a disability (physical, mental, or learning)?	Yes, at intake the County utilizes an intake form that assist identify a client's physical, mental, or learning needs.
Does the County assist clients with self-identifying a disability?	Yes, at intake staff asks the client if there are any reasonable accommodations the client may need.
Does the County have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?	Yes, the County has a policy for assisting clients with a disability (physical, mental, or learning).
Does the County offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	Yes, at intake staff asks the client if there are any reasonable accommodations the client may need.

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County identify and assist the client who has learning disabilities or a client who cannot read or write?	Yes, when a client has difficulty understanding or completing documents, staff explains documents verbally and the assists the client complete the paperwork.
Does the County offer a screening for learning disabilities?	Yes, the County has screening for learning disabilities.
Is there an established process for offering a screening?	Yes, the County has an established process for offering screening at all program offices.
Is the client identified as having a learning disability referred for an evaluation?	Yes, clients identified as having a learning disability are referred for an evaluation.

Corrective Action: None.

Recommendation: None.

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

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

A. Findings from Case File Reviews and Staff Interviews

In Home Support Services / Adult Protective Services

Item	How item is Documented
Ethnic Origin	Identified at client intake. Documented in case file.
Method of identifying client's primary language	Identified at client intake. This information is documented in the case comments and in electronic intake forms.
Method of documenting client's primary language	Identified at client intake. Documented in case file.
Method of providing bilingual services and documentation	Identified at client intake. The client will be assigned to a bilingual worker and this is documented in the case file.

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

CalWORKs and Eligibility

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

Item	How item is Documented
Method of documenting client's disability (physical, mental, or learning)	When the client self identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	Inquiring about the need for reasonable accommodations is part of the intake process. After the client self identifies any disability, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self identifies any disability, it is documented in the case file and at every client interview the reasonable accommodation is acknowledged.

Children Family Services

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

Item	How item is Documented
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	When a minor under 18 is used as an interpreter, it is documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstances are documented in the case file.
Method of identifying client's disability	The client self identifies any disabilities and this is documented in the clients electronic file.
Method of documenting client's disability (physical, mental, or learning)	When the client self identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	Inquiring about the need for a reasonable accommodation is part of the intake process. After the client self identifies and disability, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self identifies any disability, it is documented in the case file and at every client interview the reasonable accommodation is acknowledged.

Corrective Action: None.

Recommendation: None.

VII. STAFF DEVELOPMENT AND TRAINING

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

A. Findings

Interview Questions: (Please answer yes/no and provide response with comments)	Comments
Are employees trained in the requirement of Section 504 and ADA?	Yes, employees are trained on Section 504 and ADA requirements.
Do employees receive continued Division 21 Training?	Yes, Division 21 Training is accomplished annually.
Do employees understand the County policy regarding a client's rights and procedure to follow when receiving a discrimination complaint?	Yes, employees understand the County policy regarding a client's rights and procedure to follow when receiving a discrimination complaint.
Does the County provide employees Cultural Awareness Training?	Yes, employees receive Cultural Awareness Training annually.
Do the CSW's have an understanding of Multi-Ethnic Placement Act (MEPA)?	Yes, during the annual training employees receive MEPA training.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	Yes, in Glenn County the employees seem knowledgeable about the predominant cultural groups receiving services in their area.
Does the County provide training on how to identify clients with disabilities (physical, mental, learning)?	Yes, training on how to identify clients with disabilities (physical, mental, learning) is completed annually.
Do employees receive training on reasonable accommodation for clients with disabilities?	Yes, employees receive training on the County policy regarding clients with disabilities annually.
Do the employees understand the County policy regarding a client's right to a reasonable accommodation?	Yes, employees receive training on the County policy regarding a client's right to a reasonable accommodation annually.

Corrective Actions: None.

Recommendation: None.

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, employees can easily identify the difference between a program, discrimination, and personnel complaint.
Do the employees know who the Civil Rights Coordinator is?	Yes, everyone asked in the County review was able to identify the Civil Rights Coordinator. This information is visibly posted in the Lobby of each building.
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, employees asked 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 knew where to find it.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	Yes, the Civil Rights Coordinator keeps the complaint log complete and up to date.

Corrective Actions: None.

Recommendation: None.

IX. VENDOR CONTRACTS

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

A. Contracts Review

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

B. Corrective Action: None.

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).

Humboldt County Department of Health and Human Services does not have a Call Center. Although there are currently no statutory requirements for call centers, the County maintains avenues in which to meet the demands of applicants, recipients, and clients.

XI. COMMUNITY INPUT

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

Butler Valley Disability Services did not share feedback or observations regarding the County's services.

XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Humboldt County Department of Health & Human Services Civil Rights Compliance Plan for the period February 4, 2019 through February 4, 2020, was received on February 11, 2019. It is approved as submitted.

XIII. CONCLUSION

The CDSS Reviewer found the Humboldt County Department of Health and Human Services staff warm, welcoming, informative and very supportive. Particular thanks to Yvonne Winters, Civil Rights Coordinator, for organizing the details of the review and who assisted in each of the facility reviews. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

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

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