



CDSS

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ARNOLD SCHWARZENEGGER  
GOVERNOR

November 5, 2010

Mr. Robert Miletich  
Civil Rights Section  
Los Angeles County Department of Public Social Services  
12860 Crossroads Parkway South  
City of Industry, CA 91746

Dear Mr Miletich:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of June 8-11, 2009. Enclosed is the final report on the review. Please accept our apology for the delay.

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 sixty 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 attached report.

We will provide a copy of our 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 too, becomes a public document. Per the Governor's Executive Order S-08-09, all compliance reviews (and corresponding CAPs) performed after January 2008 will be posted on the state's Reporting Government Transparency website.

If you need technical assistance in the development of your CAP, please feel free to contact the Civil Rights Bureau at (916) 654-2107. You may also contact us by e-mail at [crb@dss.ca.gov](mailto:crb@dss.ca.gov).

Sincerely,

JIM TASHIMA, Acting Bureau Chief  
Civil Rights Bureau  
Human Rights and Community Services Division

Enclosure

c: Alma Calvelo, Civil Rights Coordinator

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR  
LOS ANGELES DEPARTMENT OF PUBLIC SOCIAL SERVICES  
Conducted  
On  
June 8 -11, 2009**

**California Department of Social Services  
Human Rights and Community Services Division  
Civil Rights Bureau  
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**Reviewers**

**Elsa Garcia  
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## **CIVIL RIGHTS COMPLIANCE REVIEW REPORT**

### **I. INTRODUCTION**

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Los Angeles Department of Social Services (LAPDSS) 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 June 8-11, 2009 with an entrance conference was held on June 8, 2009. An exit conference was held on June 11, 2009 to review the preliminary findings.

The review was conducted in the following locations:

<b>Name of Facility</b>	<b>Address</b>	<b>Programs</b>	<b>Languages spoken by a substantial number of clients (5% or more)</b>
<b>Southwest Family District #83</b>	8300 S. Vermont Ave., Los Angeles, CA 9004	CalWORKS	English, Spanish
<b>Rancho Park #60</b>	11110 W. Pico Blvd., Los Angeles, CA 90064	NAFS, CalWORKS, Employment Services	English, Spanish
<b>Lancaster District Office #34</b>	349-B East Avenue, K-6 Lancaster, CA 93535	CalWORKS, NAFS	English, Spanish
<b>Lancaster IHSS Office #35</b>	355-C East Avenue, K-6 Lancaster, Ca 93535	IHSS	English Spanish
<b>Belvedere Office #05</b>	5445 Whittier Blvd. Los Angeles, CA 90022	CalWORKS, NAFS	English, Spanish

### **II. SUMMARY OF METHODOLOGY**

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

- Reviewed the 2008-09 Annual Civil Rights 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.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

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

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- 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**

<b>Classifications</b>	<b>Total</b>	<b>Bilingual</b>
Eligibility Workers	17	14
Adult Program Workers	2	1
Receptionist/Screeners	4	2
<b>Total</b>	<b>23</b>	<b>17</b>

#### **Program Manager Surveys**

Number of surveys distributed	5
Number of surveys received	5

#### **Reviewed Case Files**

English speakers' case files reviewed	35
Non-English or limited-English speakers' case files reviewed	175
Languages of non-English cases	Spanish, Vietnamese, Punjabi, Armenian, Tagalog
<b>Total cases reviewed</b>	<b>210</b>

Sections III through VIII 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 IX 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**

<b>Access to Services, Information and Outreach</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	<b>X</b>			Arrangements can be made for a home visit if needed, and/or applications can be mailed in.
Does the county have extended hours to accommodate clients?		<b>X</b>		See above.
Can applicants access services when they cannot go to the office?	<b>X</b>			Clients can access via the Internet on the county website to receive information on services and on-line applications. LAPDSS also has a Home Interview Program (HIP), which can be used if necessary. Both telephone and mail access is available.

Does the county ensure the awareness of available services for individuals in remote areas?	<b>X</b>			Awareness is achieved through outreach at local community centers, public libraries, via the LADPSS website, and LA County's 211 information line.
<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)? Is the pamphlet distributed and explained to each client at intake and re-certification?	<b>X</b>			The pamphlet is handed out and explained at intake. The client is asked to sign the PA 2457 form that states the Pub 13 was received and explained. A copy of the form is placed in case folder.
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?	<b>X</b>			
Was the Pub 13 available in large print, audiocassette and Braille?	<b>X</b>			
Were the current versions of the required posters present in the lobbies?		<b>X</b>		The current version of And Justice for All Poster #475B was not present at the Southwest Family #83 Office.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	<b>X</b>			
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated		<b>X</b>		Instructional and directional signage needed to be in threshold language, (Spanish) at the



into appropriate languages?				Southwest Family #83 Office.
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**B. Corrective Actions**

Informational Element	Corrective Action Required
Directional signage	LAPDSS County shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and that where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages. Div. 21-107.212 and .24
Posters	LAPDSS shall ensure that the most current version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms. Div. 21-107.211

The most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	03/07
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact your program consultant to receive the most recent versions, or download the Pub 13 from the CRB website [http://www.dss.cahwnet.gov/civilrights/YourRights\\_498.htm](http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm).

**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.

### **A. Findings and Corrective Actions**

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

#### **Facility #1: 8300 S. Vermont Ave, Los Angeles, CA - Southwest Family # 83**

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
<b>Parking</b>	<p>Eight accessible spaces are too narrow at 8'7" wide.</p> <p>Eight accessible spaces are too short at 17' long.</p>	<p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135</p> <p>Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 &amp; 2, ADA 4.6.3) p 135</p>
<b>Van Accessible Parking</b>	<p>One van accessible space is too narrow at 8'7" wide.</p> <p>One van accessible space is too short at 17' long.</p>	<p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135</p> <p>Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p 135</p>
	"No Parking", needs to be repainted in access aisle.	The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p 135

<b>Parking</b>	<p>Persons with disabilities are forced to go behind cars.</p> <p>Parking is not located as close as possible to entrance.</p>	<p>Persons with disabilities shall not be forced to go behind parked cars except their own. (CA T24 1129B.4.3) (<i>hardship exception, p 136</i>)</p> <p>Located on shortest accessible route. (CA T24 1129B.1.2, ADA 4.3.2(1)) p 131</p>
<b>Route of Main Door - Ramp</b>	<p>There are two ramps (left and right side): the slope on the right side is too steep at 10.9% at top of ramp before the landing.</p> <p>Width of ramp measured at 47" left-side and 46 ½ right-side.</p>	<p>Slope of curb ramp does not exceed 1:12 (8.3% slope) (CA T24 1127B.5.3, ADA 4.8.2)</p> <p>The width of ramps is as required for stairways and exits. Pedestrian ramps have a minimum width of 48" (CA T24 1133B.5.2.1)</p>
<b>Client Lobby</b>	<p>Directional signage to accessible entrance was not found in threshold language.</p> <ol style="list-style-type: none"> <li>1. Customer Service</li> <li>2. Child Play Area</li> </ol>	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients 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. (Div 21.107-212)</p>
<b>Posters</b>	<p>The "And Justice for All" poster #475B was not current (revision date of 03/98).</p>	<p>Posters on nondiscrimination provided by CDSS shall be prominently displayed in all waiting rooms and reception areas. Current version of #475B is 12/99.</p>
<b>Client Interview Room/Booths</b>	<p>Signage was too high at 72".</p>	<p>Where permanent identification is provided for rooms and spaces, signs are installed on</p>

		<p>the wall adjacent to the latch outside of the door. (CA T24 1117B.5.7, ADA 4.30.6) p 357</p> <p>Mounting height is 60" above the finished floor to the center of the sign. (CA T24 1117B.5.7, ADA 4.30.6) p 357</p>
<b>Men's Restroom</b>	<p>Accessible signage on the wall adjacent to door is too high at 60 ½".</p> <p>Force to open door is excessive at 13 lbs.</p> <p>There are two urinals; one urinal is too high at 19". The second urinal was 16" high but it was out of service.</p>	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 263</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 195</p> <p>Rim height shall be a maximum of 17" in height above the floor. (CA T24 1115B.2.1.1.1, ADA 4.18.2) p 265</p> <p>Urinals: Where there are urinals provided, at least one (1) shall provide a clear floor space of 30" wide x 48" deep in front of the urinal to allow for a</p>

		forward approach. This clear space may extend 6" maximum under the urinal if the urinal has a 9" minimum toe clearance from the floor to the urinal's bottom. (CA T24 1115B.9.4, ADA 4.18.3 & 4.22.5) p 265
<b>Women's Restroom</b>	<p>Accessible signage on the wall adjacent to door is too high at 60 ½". The door sign is too high at 61".</p> <p>Force to open door is excessive at 15 lbs.</p>	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 263</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 195</p>

**Facility #2: 11110 W. Pico Blvd, Los Angeles, CA – (Rancho Park # 60)**

Total of three lobbies/floors reviewed. This building has separate lobbies for each floor, according to program.

**1<sup>st</sup> Floor - #1 Lobby**

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
<b>Parking Garage</b>	Three accessible spaces are too narrow at 8'4" and 8'6" wide.	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135

	<p>Van accessible space (across from the elevator) is too short at 17'10" Long. Parking should not be allowed behind parked vehicles in accessible spaces. Persons with disabilities are forced to go behind cars.</p> <p>Accessible parking next to employee elevator has no access aisle, and is not connected to a safe path of travel to the public elevator.</p> <p>The words "No Parking" are not painted on pavement in access aisle.</p>	<p>Persons with disabilities shall not be forced to go behind parked cars except their own. (CA T24 1129B.4.3) (<i>hardship exception, p 136</i>)</p> <p>Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 &amp; 2, ADA 4.6.3) p 135 Access aisles (load and unload) must connect to the accessible path of travel, including curb cuts or ramps as needed (CA T24 1129B.4.3, ADA 4.6.3) p 136 Walkways minimum 48" (CA T24 1133B.7.1) p 160</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 &amp; 2) p 135</p>
<b>Exterior Main Entrance</b>	<p>Door does not have 10" of smooth, uninterrupted surface that allows door to open by a wheelchair foot-rest.</p> <p>Force to open door is excessive at 16 lbs. *(Door is kept open during business hours and security guard is</p>	<p>The bottom 10" of all doors except automatic and sliding shall have a smooth, uninterrupted surface to allow the door to be opened by a wheelchair footrest without creating a trap or hazardous condition. (CA T24 1133B.2.6) p 198</p> <p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p 195</p>

	available to assist disabled persons in wheelchairs). No corrective action is required due to accommodation.	
<b>Lobby</b>	First floor lobby has a customer service receptionist who directs clients to appropriate floor according to services they are seeking. Clients who are in wheelchairs are referred to accessible receptionist counter in the General Relief lobby.	
<b>Men's Restroom</b>	<p>Accessible sign is too high at 66" on wall adjacent to the latch side of the door.</p> <p>Force to open door is excessive at 20 lbs. Door was in need of service.</p>	<p>Door sign and wall sign shall be at 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 263</p> <p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p 195</p>

<b>Women's Restroom</b>	Accessible sign is too high at 66 ½" on wall adjacent to the latch side of the door.	<p>Door sign and wall sign shall be at 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 263</p>
<b>Elevator</b>	Call button is too high at 43 ½".	The centerline of the hall call button shall be within 42 inches of the floor. (CA T24 1116B.1.10 and 1116B.1.13, ADA 4.10.3) pp 232, 234
<b>2<sup>nd</sup> Floor - #2 Lobby CalWORKS Program</b>		
<b>Men's &amp; Women's Restroom</b>	Force to open door is excessive at 10 lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 195
<b>3<sup>rd</sup> Floor - #3 Lobby Food Stamps Program</b>		
<b>Men's Restroom</b>	<p>Force to open door is excessive at 11 lbs.</p> <p>Pipes under sink are not securely insulated, need to be wrapped.</p> <p>Towel dispenser is too</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p 195</p> <p>Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p</p>



	high at 51 ½ “	267
<b>Women’s Restroom</b>	Force to open door is excessive at 10 lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 195

**Facility #3: 5445 Whittier Blvd., Los Angeles, CA – (Belvedere # 05)**

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
<b>Main Entrance Door</b>	Force to open door is excessive.  9 lbs – Entrance door 7 lbs – Exit door	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 195
<b>Interior accessible route</b>	The width of the security metal detector passage is too narrow at 30”. *(Security guard will assist client in wheelchair through the exit door and scan with a security wand). No corrective action is required due to accommodation.	Wheelchair passage width: minimum clear width required for a single wheelchair is 32” at a point (e.g., at a door); and continuous length is 36” (at a corridor). (CA T24 1118B.1, ADA 4.2.1) p 217

**Facility #4: 349-B E. Ave. K-6, Lancaster, CA – (Lancaster # 34)**

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
<b>Parking</b>	There is no “unauthorized parking” signage at the Gingham Street entrance.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17” by 22” min. in size with lettering 1” min. high, stating: “Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for

	<p>Three accessible spaces are too narrow at 8'6" and 8'9" wide.</p> <p>One van-accessible space has the access aisle on wrong side (driver's side). One accessible space does not clearly depict a wheelchair w/occupant painted on pavement.</p>	<p>persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____. (CA T24 1129B.5) p 133</p> <p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 &amp; 2, ADA 4.6.3) p 135</p> <p>Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p 135 Pavement signage shall be 36" x 36" minimum, white on blue in color, visible and centered. (CA T24 1129B.5.1 &amp; 2) p 133</p>
<b>Ramp to entrance</b>	Ramp slope is too steep at 19.6 %.	Slope of curb ramp does not exceed 1:12 (8.3% slope) (CA T24 1127B.5.3, ADA 4.8.2)
<b>Public telephone</b>	There are three public telephones immediately outside of the entrance. These phones do not meet accessibility requirements (volume control or hearing aid).	If there are one or more single units, one or at least 50% of telephone unit(s) per floor must be accessible. (CA T24 1117B.2.1, ADA 4.1.3(17)(a)) p 251
<b>Main Entrance</b>	<p>Force to open door is excessive at 15 lbs.</p> <p>Door closes under 3 seconds.</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p 195</p> <p>Door Closer (if present) must be set so it takes at least 3 seconds to close from an open position of 70 degrees to a point 3" from</p>

		the latch. (CA T24 1133B.2.5.1, ADA 4.13.10) p 199
<b>Men's Restroom</b>	<p>Accessible signage on wall is too high at 63".</p> <p>Force to open door is excessive at 7 lbs.</p> <p>Soap dispenser is too high at 43".</p>	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 263</p> <p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p 195</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p 269</p>
<b>Women's Restroom</b>	Accessible signage on door and wall is too high at 63".	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors,</p>

	<p>Soap dispenser is too high at 43".</p>	<p>the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 263</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p 269</p>
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**Facility #5: 335-C Avenue K-6, Lancaster, CA - IHSS - Lancaster # 35**

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
<b>Parking</b>	<p>There is no van-accessible parking space.</p> <p>Eight freestanding signs are too low. They range between 63"- 78" high.</p> <p>Parking spaces in front of main entrance need "No Parking" painted on pavement in access aisles.</p>	<p>One in every 8 <i>accessible</i> spaces (no fewer than 1) shall be designated van accessible. (CA T24 1129B.4.2, ADA 4.1.2(5)(b)) pp 135, 136</p> <p>Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p 133</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 &amp; 2) p 135</p>

	Accessible parking spaces located at end of building need directional signage.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp 183, 353
<b>Main Entrance</b>	Force to open door is excessive at 15 lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 195
<b>Men's Restroom</b>	<p>No accessible signage on wall adjacent to door latch.</p> <p>Force to open door is excessive at 15 lbs.</p> <p>The clear space in front of urinal is too narrow at 25 ½.</p>	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 263</p> <p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p 195</p> <p>Urinals: Where there are urinals provided, at least one (1) shall provide a clear floor space of 30" wide x 48" deep in front of the urinal to allow for a forward approach. This clear space may extend 6" maximum under the urinal if the urinal has a 9" minimum toe clearance from the floor to the urinal's</p>

	<p>Pipes under sink are not securely insulated.</p> <p>Accessible stall door can not be opened with a closed fist.</p> <p>Toilet tissue dispenser is too far from the front edge of toilet.</p>	<p>bottom. (CA T24 1115B.9.4, ADA 4.18.3 &amp; 4.22.5) p 265</p> <p>Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p 267</p> <p>Locking/Latching Doors: If hand-operated, to be operable with a single effort (e.g.; lever, panic bar, push/pull) (CA T24 1133B.2.5.2, ADA 4.13.9) p 197</p> <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp 275, 269</p>
<b>Women's Restroom</b>	<p>No accessible signage on wall adjacent to door latch.</p> <p>Force to open door is excessive at 16 lbs.</p> <p>Pipes under sink are not securely insulated.</p>	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 263</p> <p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p 195</p> <p>Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p 267</p>

	<p>Accessible stall door can not be opened with a closed fist.</p> <p>Toilet tissue dispenser is too far from the front edge of toilet.</p>	<p>Locking/Latching Doors: If hand-operated, to be operable with a single effort (e.g.; lever, panic bar, push/pull) (CA T24 1133B.2.5.2, ADA 4.13.9) p 197</p> <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp 275, 269</p>
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#### **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 they 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 (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, 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**

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county identify a client's language need upon first contact? How?	<b>X</b>			At intake client completes application and Language Preference Form PA 481.
Does the county use a primary language form?	<b>X</b>			Language Preference Form PA 481
Does the client self-declare on this form?	<b>X</b>			
Are non-English- or limited- English-speaking clients provided bilingual services?	<b>X</b>			At intake when clients indicate they have a need for bilingual services, staff follows county process.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	<b>X</b>			Clients are assigned to a bilingual worker by using the DPSS Bilingual Resource Utilization Database. If there is no bilingual worker in client's language, an interpreter is contacted through an outside telephone interpreter contractor.
Is there a delay in providing services?	<b>X</b>			At the Lancaster Office #34, it can take up to 3 days to secure an interpreter if no bilingual worker is available in client's language.
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	<b>X</b>			There is a LADPSS Bilingual Resource Utilization Database to locate bilingual workers. The county also has an outside telephone interpreter contractor who provides interpretive services.



Question	Yes	No	Some-times	Comments
Are county interpreters determined to be competent?	X			LADPSS requires that all employees who provide bilingual services be certified to read, write, and speak a particular language.
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?		X		Interpreters must be over 18 years old.
Does the county allow the client to provide his or her own interpreter?	X			Client and interpreter must sign confidentiality form PA 481A.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			Client and interpreter must sign PA 481A form.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			
Is the information that is to be inserted into NOA translated into the client's primary language?	X			
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	X			

Question	Yes	No	Some-times	Comments
material, taped text, large print materials (besides the Pub 13)?				
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			Staff interviewed stated that they will assist the client with reading and ensure they understand the material being presented to them.
Does the county offer screening for learning disabilities?	X			In the Gain Program, clients are screened for disabilities.
Is there an established process for offering screening?	X			Clients are screened at intake.
Is the client identified as having a learning disability referred for evaluation?	X			Clients are referred to the Gain Program.

## B. Corrective Actions

Area of Findings	Corrective Actions
Effective Services	LADPSS County must develop and implement a policy that identifies the process to ensure effective services to applicants and recipients who are non-English speaking or who have disabilities. Div. 21-115
Timely Services	LADPSS County must ensure that bilingual/interpretive services are prompt and without undue delay. Div. 21-115

## **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**

<b>Documented Item</b>	<b>IHSS</b>	<b>CalWORKs</b>	<b>Non-Assisted Food Stamps</b>
Ethnic origin documentation	Referral Form	SAWS1	SAWS1, DFA285
Primary language documentation	PA 1955	PA 481	PA 481, Leader
Method of providing bilingual services	Case narrative	Case comments in Leader	Case comments in Leader
Client provided own interpreter	None found in case sample.		
Method to inform client of potential problem using own interpreter	None found in case sample.	PA 481 A	PA 481 A
Release of information to Interpreter	None found in case sample.	PA 481 A	PA 481A
Individual's acceptance or refusal of written material offered in primary language	None found in case sample.	PA 481 A	PA 481 A
Documentation of minor used as interpreter	None found in case sample.	None found in case sample.	None found in case sample.

<b>Documented Item</b>	<b>IHSS</b>	<b>CalWORKs</b>	<b>Non-Assisted Food Stamps</b>
Documentation of circumstances for using minor interpreter temporarily	None found in case sample.	None found in case sample.	None found in case sample
Translated notice of actions (NOA) contain translated inserts	Case file	Leader	Leader
Method of identifying client's disability	Narrative	SOF	SOF, SAWS2
Method of documenting a client's request for auxiliary aids and services	Narrative	It would be noted in case comments. None found in sample.	It would be noted in case comments. None found in sample.

## **VII. STAFF DEVELOPMENT AND TRAINING**

Counties are required to provide civil rights and cultural awareness 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**

<b>Interview questions</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Do employees receive continued Division 21 Training?	<b>X</b>			Training is provided to staff annually.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	<b>X</b>			

Does the county provide employees Cultural Awareness Training?	X			Training is provided to staff annually.
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			Staff interviewed had a good understanding of MEPA.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			Staff interviewed were aware of the cultural groups in their area.

## **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 responsibility to maintain this log.

### **A. Findings from Staff Interviews and Program Manager Surveys**

<b>Interview and review areas</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Findings</b>
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			All staff interviewed understood the difference between the three types of complaints.
Did the employees know who the Civil Rights Coordinator is?	X			All staff interviewed knew who their civil rights coordinator was.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			All staff interviewed were aware of the poster's location.

Interview and review areas	Yes	No	Some-times	Findings
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

## IX. CONCLUSION

The CDSS Civil Rights Bureau would like to acknowledge and thank Andy Nguyen, Acting HSA II, Management Information and Evaluation Section and Alma Calvelo, Human Services Administrator I, Civil Rights Section, and all the staff involved with the coordination and success of the review. The reviewers were given a warm welcome and complete cooperation throughout the review. The LADPSS staff interviewed were found to be professional, pleasant, and committed to providing outstanding service to their clients. LADPSS staff are commended on its efforts and willingness to provide quality and superior service to its clients

CDSS found LADPSS in overall compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

LADPSS must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan 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 by which all actions will be taken to correct the deficiencies.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance deficiencies and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff are available to provide technical assistance if requested.