



CDSS

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**DEPARTMENT OF SOCIAL SERVICES**  
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EDMUND G. BROWN JR.  
GOVERNOR

July 26, 2012

Sheryl L. Spiller, Acting Director  
Los Angeles County  
Department of Public Social Services  
12860 Crossroads Parkway South  
Los Angeles, CA 91746-3411

Dear Ms. Spiller:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office, Elsa Garcia during the course of the Civil Rights Compliance Review of June 25-29, 2012. 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 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 becomes a public document as well. In addition, they are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>

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, Chief  
Civil Rights Bureau  
Human Rights and Community Services Division

Enclosure

c: Gloria Easley, Civil Rights Coordinator

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

**Conducted on  
June 25 -29, 2012**

**California Department of Social Services  
Human Rights and Community Services Division**

**Civil Rights Bureau**

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

**Sacramento, CA 95814**

**(916) 654-2107**

**Reviewer**

**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 Public Social Services (LADPSS) with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on June 25-29, 2012. An exit interview was held with LADPSS managers and administrative staff 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>Non-English languages spoken by a substantial number of clients (5% or more)</b>
GAIN Region V	2959 E. Victoria St., Rancho Dominguez, CA	GAIN	Spanish
Paramount #62	2961 E. Victoria St., Rancho Dominguez, CA	CalFresh	Spanish
IHSS - Hawthorne	12000 S. Hawthorne Blvd. "A" Hawthorne, CA	IHSS	Spanish, Cambodian
State Hearings Office	811 Wilshire Blvd., 11 <sup>th</sup> Floor Los Angeles, CA	N/A	Spanish

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

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

- Reviewed the 2012-13 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 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	4	3
Adult Program Social Workers	4	3
GAIN Social Worker	4	4
Receptionist/Screeners	3	3
<b>Total</b>	<b>15</b>	<b>13</b>

#### Program Manager Surveys

Number of surveys distributed	3
Number of surveys received	3

#### Reviewed Case Files

English speakers' case files reviewed	5
Non-English or limited-English speakers' case files reviewed	65
Languages of clients' cases	Spanish, Cantonese, Korean, Tagalog, Cambodian

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 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 X 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?	X			Office hours are 8:00 a.m. to 5:00 p.m., Services can be accessed by mail.
Does the county have extended hours to accommodate clients?	X			Home visits can be arranged for participants who cannot come into the office. Telephone interviews can also be conducted.
Can applicants access services when they cannot go to the office?	X			Services can be accessed by mail, Your Benefits Now (YBN) on-line, Interactive Voice Response (IVR), telephone, DPSS website, and Customer

				Service Toll Free Line.
Does the county ensure the awareness of available services for individuals in remote areas?	X			The outreach programs include the Public toll-free telephone numbers; Health & Nutrition Hotline, radio and television Public Service Announcements, billboard information messages, the Department's internet website and departmental collaboration with the "LACounty Helps" website.

**B. Corrective Action :**

None required.

<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 – 6/11)?	X			LADPSS uses the pamphlet as an informational handout and reinforces policy to all LADPSS District/Regional offices to have this CDSS pamphlet available in all waiting rooms or reception areas of public contact offices.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			The pamphlet is distributed and explained during the intake and annual redetermination/recertification period
Is the current version of Pub 13 available in Arabic, Armenian				



<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukranian, Vietnamese?	X			
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?	X			
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	X			All office sites reviewed had the Braille, large print and audio available at the reception desk.
Were the current versions of the required posters present in the lobbies?	X			All office sites had the current required posters present in lobbies.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			All staff interviewed knew the location of posters.
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?	X			All office sites visited had proper directional signage translated into appropriate threshold language(s).

**B. Corrective Action :**

None required.

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

Pub 13	"Your Rights under California Welfare Programs"	06/11
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact the Civil Rights Bureau 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.

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

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

##### **Facility Location #1: GAIN V, 2959 E. Victoria St., Rancho Dominguez**

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
<b>Main Entrance Door</b>	Pressure to open door measured at 12 lbs.	The maximum force required to push or pull open a door shall comply with the following:  Exterior Door: 5 pounds of force maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(A)) p 207

<b>Lobby</b>	The accessible counter is too high at 36".	Min. height is 28" and max height is 34" from floor or ground top of tables or counters. (CA T24 1122B.4) (ADA 4.32.4) p 396
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**Facility Location #2: Paramount #62, 2961 E. Victoria St., Rancho Dominguez**

Facility Element	Findings	Corrective Action
	<i>No findings</i>	<i>N/A</i>

**Facility Location #3: IHSS Hawthorne, 12000 S. Hawthorne Blvd., Hawthorne**

Facility Element	Findings	Corrective Action
	<i>No findings</i>	<i>N/A</i>

**Facility Location #4: 811 Wilshire Blvd., Los Angeles (State Hearings)**

Facility Element	Findings	Corrective Action
<b>Main Building Entrance Doors</b>	The bottom of both sets of door(s) do not have 10" smooth uninterrupted surface to allow the door to be opened by a wheelchair footrest.	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 209
<b>11th Floor Women's Restroom</b>	Toilet sheet protector is too high at 47".	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 T24 1115B.8.1.1) (ADA 4.19.6) p 296, 299, 304

**B. Observation**

All the facilities were found to be exceptional in the provision of accessibility for the disabled and limited-English-proficient participant population. Signage and presentation of civil rights materials provided visible evidence to the client population that the agency is sensitive to their needs and available to provide assistance as needed. We commend LADPSS's efforts to ensure accessibility for the disabled.

**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**

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			Participants are immediately greeted by customer service staff and asked at the first point of contact to identify their preferred language on PA 481 Language Designation Form or

Question	Yes	No	Some-times	Comments
				use the language card to assist to identify a language that staff may be unfamiliar with.
Does the county use a primary language form?	X			The Primary Language Designation Form, PA 481 is used.
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Participants identify their preferred language. Workers will flag for a certified bilingual staff worker to assist them. If no bilingual worker is available who speaks their language, then staff can request assistance through other bilingual worker or the Language line.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			The primary language is designated by the participants and cases are assigned to workers who are certified in the same primary/preferred language.
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			DPSS uses an over the phone language services provider; Open Communications International/Avaza (OCI/Avaza).
Are county interpreters determined to be competent?	X			County interpreters are required to demonstrate proficiency and pass a verbal and written test.
Does the county have adequate interpreter services?	X			

Question	Yes	No	Some-times	Comments
Does the county allow minors to be interpreters? If so, under what circumstances?		X		DPSS does not allow minors to be interpreters.
Does the county allow the client to provide his or her own interpreter?	X			If participant prefers to use their own interpreter they may do so, but they must sign confidentiality form PA 481-A.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			A county provided interpreter is available to ensure the participant understands what is being interpreted for the client.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			All staff interviewed stated they use the CDSS-translated forms for participant's primary language. Also, LADPSS has a DPSS Forms library available on-line.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			The case is designated the client's preferred language, and LEADER provides translated notices. However, if a language is not available the form would be translated in the necessary language. In the GAIN program, GEARS also has a language indicator. Forms are available through the GEARS forms library as well.
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	X			Auxiliary aides are available at each office, and services are provided to clients who need it.

Question	Yes	No	Some-times	Comments
the Pub 13)?				
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			Participants are provided the assistance they need. Staff interviewed stated they would read the forms to the client and help them to understand.
Does the county offer screening for learning disabilities?	X			In the GAIN Program, there is a screening process for learning disabilities.
Is there an established process for offering screening?	X			See above comment.
Is the client identified as having a learning disability referred for evaluation?	X			If a client has a learning disability they are referred for further evaluation.

**B. Corrective Action :**

None required.

**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**

Documented Item	Adult Programs (IHSS)	GAIN	Non-Assistance CalFresh
Ethnic origin documentation	SOC 295/293 CMIPS	SAWS1 GEARS	SAWS1 DFA 285 A1

<b>Documented Item</b>	<b>Adult Programs (IHSS)</b>	<b>GAIN</b>	<b>Non-Assistance CalFresh</b>
			LEADER
Primary language documentation	SOC 295 Form PA 481	GEARS Form PA 481	SAWS1, DFA 285 A1 Form PA 481
Method of providing bilingual services and documentation	Comments in CMIPS	GEARS Comments	LEADER Comments
Client provided own interpreter	PA 1955 Form	PA 1955 Form	PA 1955 Form
Method to inform client of potential problem using own interpreter	None found in case sample.	None found in case sample.	None found in case sample.
Release of information to Interpreter	PA 481A (None found in case sample.)	PA 481A (None found in case sample.)	PA 481A (None found in case sample.)
Individual's acceptance or refusal of written material offered in primary language	PA 481	PA 481	PA 481
Documentation of minor used as interpreter	None found in case sample	None found in case sample	None found in case sample
Documentation of circumstances for using minor interpreter temporarily	N/A	N/A	N/A
Translated notice of actions (NOA) contain translated	CMIPS	GEARS	LEADER



Documented Item	Adult Programs (IHSS)	GAIN	Non-Assistance CalFresh
inserts			
Method of identifying client's disability	Case narrative and CMIPS	Case comments	Case comments
Method of documenting a client's request for auxiliary aids and services	CMIPS Case comments	GEARS Case comments	LEADER Case comments

**B. Corrective Action :**  
None required.

**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**

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			All staff interviewed stated they received continued Division 21 Training.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			All staff interviewed understood the county policy regarding the procedure to file a complaint.

Does the county provide employees Cultural Awareness Training?	X			All staff interviewed stated they received Cultural Awareness training.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

**B. Corrective Actions:**  
None required

**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**

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			All staff interviewed was able to identify the difference between the three types of complaints.
Did the employees know who the Civil Rights Coordinator is?	X			All staff interviewed knew who the Civil Rights Coordinator is.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			All staff interviewed knew the location of the Civil Rights poster location.
When reviewing the complaint log with the Civil				

Interview and review areas	Yes	No	Some-times	Findings
Rights Coordinator, was it complete and up to date?	X			

- B. Corrective Action:**  
None required

## IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Los Angeles County Department of Social Services Civil Rights Compliance Plan for the period 2012- 2013, was received on May 15, 2012 and is approved as submitted.

## X. CONCLUSION

The CDSS reviewer found the Los Angeles County Department of Public Social Services staff warm, welcoming, informative and very supportive. Particular thanks to Gloria Easley, Civil Rights Coordinator, and Sheila Early, Acting HSA I, Management Information and Evaluation Section and all their staff involved in organizing the details of the review, and also to the Facilities personnel, 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 Los Angeles County Department of Public Social 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 Los Angeles County Department of Public Social Services 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 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 our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.