



CDSS

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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES

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EDMUND G. BROWN JR.
GOVERNOR

December 31, 2012

Trent Rhorer, Director
Department of Human Services
City and County of San Francisco
P.O. Box 7988
San Francisco, CA 94120

Dear Mr. Rhorer:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office, Mr. James Urquizo during the course of the Civil Rights Compliance Review of September 10 through September 14, 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 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.

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, these documents 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 Mr. James Urquizo at (916) 654-2101. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

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

Enclosure

c: Robert Thomas, Civil Rights Coordinator

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
THE DEPARTMENT OF HUMAN SERVICES
CITY AND COUNTY OF SAN FRANCISCO**

Conducted on

September 10 thru September 14, 2012

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
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Reviewer: James Urquizo

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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 Department of Human Services City and County of San Francisco 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 September 10 thru September 14, 2012. An exit interview was held on September 14, 2012, 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)
Department of Human Services City and County of San Francisco	1650 Mission Street	In Home Supportive Services	Spanish, Cantonese
	77 Otis Street	Adult Protective Services	Spanish, Cantonese
Department of Human Services City and County of San Francisco	3120 Mission Street	CalFresh, Family & Children Services	Spanish, Cantonese
Department of Human Services City and County of San Francisco	1800 Oakdale	CalWorks, Emergency Services	Spanish, Cantonese
Department of Human Services City and County of San Francisco	225 Valencia	Family & Children Services	Spanish, Cantonese

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2012 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.
- Conducted a conference call with the Bay Area Legal Aid Group.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections
- Focus on issues brought up by the Bay Area Legal Aid Group.

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
- Issues brought up by the Bay Area Legal Aid Group.

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

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	8	6
Children Social Workers	9	9
Adult Program Workers	7	6
Receptionist/Screeners	2	2
Total	26	23

Program Manager Surveys

Number of surveys distributed	5
Number of surveys received	5

Reviewed Case Files

English speakers' case files reviewed	5
Non-English or limited-English speakers' case files reviewed	35
Languages of clients' cases	English, Spanish, Cantonese

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

Section XI 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	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			
Does the county have extended hours to accommodate clients?	X			
Can applicants access services when they cannot go to the office?	X			
Does the county ensure the awareness of available services for individuals in remote areas?	X			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)?	X			
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			
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, 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			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	X			
Were the current versions of the required posters present in the lobbies?	X			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			
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			

B. Corrective Actions
None

C. Observation
SF County is utilizing the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13) in a highly visible manner. County staff is aware of Pub 13 Location and regularly read the Pub 13 to clients for comprehension.

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: 1650 MISSION STREET – IHSS
(MONDAY – SEPTEMBER 10, 2012)

- a. No observed discrepancies – good job!

2. Facility Location: 77 OTIS – APS
(MONDAY – SEPTEMBER 10, 2012)

- a. No observed discrepancies – good job!

3. Facility Location: 3120 MISSION STREET – CalFresh, FCS
(TUESDAY – SEPTEMBER 11, 2012)

- a. No observed discrepancies – good job!

**4. Facility Location: 1800 OAKDALE OFFICE – CalWorks,
Emergency Services**
(WEDNESDAY – SEPTEMBER 12, 2012)

Facility Element	Findings	Corrective Action
Exterior gate entrance	No directional sign referring people to front of building for entrance on the fence at the side of the building.	Signs shall indicate the direction to accessible building entrances and facilities. (CA T24 1117B.3) p 191, 400
Men's Restroom	1st, 2 nd and 3 rd floor wash basins pipes under sink were not securely insulated. Location : 1st floor - next to elevators 2nd floor - next to auditorium 3rd floor - lobby area	Hot water and drain pipes should be insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.4.3.4) ADA 4.19.4) p 296
Men's Restroom	Bathroom soap dispenser (3 rd floor) should be at 40" inches from floor. It is at 46" inches from floor. Location : Lobby	Soap dispenser, if provided , must be at a maximum height of 40" (CA T24 1115B.8.1.1) (ADA 4.19.6) p 296. 299. 304
Women's Restroom	1st, 2 nd and 3 rd floor wash basins pipes under sink were not securely insulated. Location : 1st floor - next to elevators 2nd floor - next to auditorium 3rd floor - lobby area	Hot water and drain pipes should be insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.4.3.4) ADA 4.19.4) p 296

5. Facility Location: 225 VALENCIA, Children Family Services
(THURSDAY – SEPTEMBER 13, 2012)

Facility Element	Findings	Corrective Action
Elevator	Elevator buttons on 1 st and 2 nd floor were not in braille	Accessibility signage on the outside of the elevator entrance must have lettering-numbering in braille. (CA T24 1117B.5.6) (ADA 4.30.4)
Interior accessible route 36" wide to all areas.	Conference room was cluttered with excess furniture. Clear passage for a wheelchair is unavailable.	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 216
Emergency alarms	<p>Fire alarms throughout the building were audio ONLY. NO VISUAL STROBE.</p> <p>Emergency Evacuation plan was inadequate.</p> <p>There is no clear assignment of responsibilities to any one or set individuals to look for and assist any clients that might be in the building that did not see or hear the emergency alarm.</p> <p>There are no emergency evacuation maps anywhere in the building.</p>	<p>If emergency warning systems are provided, they should include both audible and visual alarms.</p> <p>If emergency warning systems are available, they shall activate a means of warning the hearing and visually impaired.</p> <p>(CA T24 1114B.2.2) (ADA 4.28.1) p 242</p>

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			Yes, at intake any special needs are identified and documented in an intake sheet.
Does the county use a primary language form?	X			Yes, the County uses a SOC 295 and a 8072 Language form.
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Yes, In-House Certified Translators and telephonic Language Line services is utilized when needed.

Question	Yes	No	Some-times	Comments
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			Yes, In-House Certified Translators and telephonic Language Line services is utilized when needed.
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			Yes, has a telephonic Language Line service that is utilized when needed
Are county interpreters determined to be competent?	X			Yes, In-House Translators are certified
Does the county have adequate interpreter services?	X			Yes, SF County has very good translation services. In House translators are competent and the Language Line services are used very well.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		There is a current County policy to not allow minors under 18 to interpret for a client.
Does the county allow the client to provide his or her own interpreter?	X			If a client strongly wants to provide his/her own interpreter, it is allowed, but they are advised of the possible loss of information by using a non-certified translator.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			The County does its best to insure information is delivered as clear as possible.

Question	Yes	No	Some-times	Comments
Does the county use the CDSS-translated forms in the clients' primary languages?	X			The county does use CDSS provided translated forms regularly in client's primary language.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			Yes, workers are insuring that NOAs are translated and inserted into the NOAs when necessary.
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)?	X			The County has outstanding auxiliary aids and services, like font enlargement screens, dual telephonic translation lines, braille and height rising desktops.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?			X	Based on telephone interviews and personal on-site questions, workers are making efforts to insure clients are assisted when they can not read or write. There is still a lack of understanding identifying clients with learning disabilities.
Does the county offer screening for learning disabilities?			X	From Interviews and conversations with staff - there is a lack of understanding concerning screening clients with learning disabilities. There is a management understanding of the need to refer clients to Community Mental Health services and to local behavioral providers, but all staff need to be regularly trained on this process.

Question	Yes	No	Some-times	Comments
Is there an established process for offering screening?			X	No process was clearly identifiable during the staff interviews. Management has an understanding of the need to offer screening but staff needs to be appraised regularly of this process.
Is the client identified as having a learning disability referred for evaluation?			X	Sometimes, but no clear and concise program is visible that offers screen for a learning disability.

B. Recommendation

The Department of Human Services City and County of San Francisco needs to develop and implement a clear and decisive program to assist all clients with any possible learning disability needs. Staff needs to be regularly trained on this requirement and where to specifically refer clients to if a learning disability is detected. Staff needs to clearly document this process in the clients file or online.

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	Children's Services (FCS, EWS)	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	Ethnicity is being identified at intake	SAWS 1 and CalWin	CalWin	Ethnicity is being identified at intake
Primary language documentation	Primary language is being identified at intake	SOC 295 And a Primary language form	FS 27 Primary language	FS 27 Primary language

Documented Item	Children's Services (FCS, EWS)	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Method of providing bilingual services and documentation	Bilingual Services are identified at intake and documented in case comments CWS/CMS	Bilingual Services are identified at intake and documented in CalWin	Bilingual Services are identified at intake and documented in CalWin	Bilingual Services are identified at intake and documented in CalWin
Client provided own interpreter	The County claims to have a policy to not admit anyone younger than 18 to serve as an interpreter.	The County claims to have a policy to not admit anyone younger than 18 to serve as an interpreter.	The County claims to have a policy to not admit anyone younger than 18 to serve as an interpreter.	The County claims to have a policy to not admit anyone younger than 18 to serve as an interpreter.
Method to inform client of potential problem using own interpreter	In general, County workers are knowledgeable to inform clients of potential problems using own interpreter. As seen in documentation.	In general, County workers are knowledgeable to inform clients of potential problems using own interpreter. As seen in documentation.	In general, County workers are knowledgeable to inform clients of potential problems using own interpreter. As seen in documentation.	In general, County workers are knowledgeable to inform clients of potential problems using own interpreter. As seen in documentation.
Release of information to Interpreter	County workers are aware to safeguard client information as identified in case files and online	County workers are aware to safeguard client information as identified in case files and online	County workers are aware to safeguard client information as identified in case files and online	County workers are aware to safeguard client information as identified in case files and online
Individual's acceptance or refusal of written material offered in primary language	Documentation was found in case files and online	Documentation was found in case files and online	Documentation was found in case files and online	Documentation was found in case files and online
Documentation of minor used	The County has a policy to	The County has a policy to	The County has a policy to	The County has a policy to

Documented Item	Children's Services (FCS, EWS)	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
as interpreter	not admit anyone younger than 18 to serve as an interpreter. There were references in case comments about advising the client on usage of a minor as an interpreter	not admit anyone younger than 18 to serve as an interpreter. There were references in case comments about advising the client on usage of a minor as an interpreter	not admit anyone younger than 18 to serve as an interpreter. There were references in case comments about advising the client on usage of a minor as an interpreter	not admit anyone younger than 18 to serve as an interpreter. There were references in case comments about advising the client on usage of a minor as an interpreter
Documentation of circumstances for using minor interpreter temporarily	References were found where the client was advised of ineffective communication when a minor is used as an interpreter.	References were found where the client was advised of ineffective communication when a minor is used as an interpreter	References were found where the client was advised of ineffective communication when a minor is used as an interpreter	References were found where the client was advised of ineffective communication when a minor is used as an interpreter
Method of identifying client's disability	Clients disability was being identified at intake, documented in case file comments and online	Clients disability was being identified at intake, documented in case file comments and online	Clients disability was being identified at intake, documented in case file comments and online	Clients disability was being identified at intake, documented in case file comments and online

B. Corrective Actions

None

C. Recommendation

None

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	From conducting and reviewing the staff interviews, it is observed that Civil Rights (CR) training <u>does not get accomplished on a regular basis.</u>
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural Awareness Training?	X			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions

Training Area	Corrective Action
Division 21, Civil Rights Training	SF County shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff

Training Area	Corrective Action
	has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1

C. Recommendation

From conducting and reviewing the staff interviews, it is observed that Civil Rights (CR) training does not get accomplished on a regular basis. In order to continue keeping all staff familiar and informed on CR requirements it is recommended that all staff be scheduled for on-going CR training.

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			
Did the employees know who the Civil Rights Coordinator is?	X			
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			
When reviewing the complaint log with the Civil Rights Coordinator, was it	X			

Interview and review areas	Yes	No	Some-times	Findings
complete and up to date?				

B. Corrective Action
None

C. Recommendation
None

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Department of Human Services City and County of San Francisco Civil Rights Compliance Plan for the period January 1, 2011 through December 31, 2011, was received on June 6, 2012. It is approved as submitted.

X. COMMUNITY INPUT

The reviewer met telephonically with representatives from the Regional Office of the Bay Area Legal Aid Group. A copy of the written input is provided as Exhibit 1 of this report. The concerns expressed by the representatives during the meeting are consistent with discussion and audit items presented in this report (see Exhibit 1 below)

A. LANGUAGE ACCESS

- County sometimes fail to provide timely interpretative services for clients who speak less common languages like Tigrinya and Arabic
- County sometimes fail to provide oral interpretation/sight translation of English documents when translated document is unavailable in client’s language or client is illiterate in his/her non-English language
- Language needs are not communicated between programs (Medi-Cal, CalWORKs, Non Assistance CalFresh)
- Inconsistent access and quality of interpretative services across programs: Medi-Cal, CalWORKs, Non Assistance CalFresh)

REVIEWER OBSERVATIONS

For the most part - The Department of Human Services City and County of San Francisco is providing timely interpretative services. The County has professional certified translation staff in-house and when needed utilize an excellent dual phone system to connect with telephonic translation services. Staff workers make concerted efforts to translate documents in the client’s language(s). A case transfer form was identified and is being used when a case is moved from one program to

another. Consistent interpretative services need to be available across all programs in the county.

B. DISABILITY

- Workers don't really understand what accommodations look like, especially out of context of obvious physical disabilities
- Too much focus on physical disabilities such as Office of Civil Rights Disabilities Section 504, paragraph 2 (OCR 2).

Which states: "To become eligible for services and protection under Section 504, a student must be determined, as a result of an evaluation, to have a physical or mental impairment that substantially limits one or more major life activities."

- Workers ignore red flags of disability or mental health issues
- Workers ignore actual disclosures/requests for accommodations
- County takes negative actions even when county knows or should have known due to flags about disability or likely disability
- Workers fail to explore if disability is related to reason for negative actions prior to taking clients
- Clients are determined "unemployable" when they have low test scores instead of focusing on more in-depth assessments, accommodations, and determining appropriate WtW activities
- Workers re-referring people to the same failed WtW activities again and again without considering if disability may relate to problems w/activity
- Labeling people with disabilities as "hostile" or "difficult"

REVIEWER OBSERVATIONS

Department of Human Services City and County of San Francisco staff workers are aware and make concerted efforts to identify clients with disabilities, but more effort and training is needed in order to clearly and professionally identify clients with disabilities. County staff need to know, without question, where to refer mentally or learning disabled clients.

Note: OCR 2 under Section 504 (Rehabilitation Act of 1973) to become eligible for services and protection under Section 504, one must be determined, as a result of an evaluation, to have a physical or mental impairment that substantially limits one or more major life activities. The County must insure that a physical or mental disability did not cause the denial of services or benefits, when applicable.

XI. CONCLUSION

The CDSS reviewer found the Department of Human Services City and County of San Francisco staff warm, welcoming, informative and very supportive. Particular thanks to Robert Thomas, Civil Rights Coordinator and David Tu, Civil Rights Coordinator Assistant - for organizing the details of the review, and to each Facilities Manager, 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 Department of Human Services City and County of San Francisco 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 Department of Human Services City and County of San Francisco 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.