



CDSS

WILL LIGHTBOURNE
DIRECTOR

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

744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



EDMUND G. BROWN JR.
GOVERNOR

November 16, 2012

Michael L. Riley, Ph.D., Director
Orange County Social Services Agency
888 N. Main Street
Santa Ana, CA 92701

Dear Mr. Riley:

This letter is to advise you that the Corrective Action Plan you submitted in response to the results of our July 23 – 27, 2012 Civil Rights Compliance Review is approved.

We will be monitoring the implementation of your corrective action items through your Civil Rights Coordinator.

If you have any questions, please contact Analyst Cindy Guzman at (916) 654-2117. You may also contact your consultant by e-mail at cindy.guzman@dss.ca.gov.

Sincerely,



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

c: Lisa Tamres , Civil Rights Coordinator

Linda Patterson, Branch Chief
CDSS CalFresh Program

Mike Papin, Chief
CalFresh Policy Bureau

Marlene Fleming, Chief
Field Operations Bureau

Brian Tam, Chief
CalFresh Management Operations Section

Paul Gardes
CalFresh Policy Bureau

**Thuan Nguyen
Refugee Programs Bureau**

**Joe Torres, Office of Civil Rights
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region**

**Hope Rios,
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region**

**Jodie Berger, Regional Counsel
Legal Services of Northern California**



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CHILDREN & FAMILY SERVICES

NATHAN NISHIMOTO
DIVISION DIRECTOR
FAMILY SELF-SUFFICIENCY

November 13, 2012

Jim Tashima, Chief
Civil Rights Bureau
Department of Social Services
744 P Street, MS 8-16-70
Sacramento, CA 95814

Dear Mr. Tashima:

The information attached is Orange County Social Services Agency's response to the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) final report dated September 17, 2012. The report is a result of the review conducted July 23-27, 2012 that assessed Orange County Social Services Agency's compliance with CDSS Manual of Policies and Procedures Division 21 Regulations and other applicable state and Federal civil rights laws. Our response includes actions taken and planned.

Thank you for the opportunity to comment and we understand that our response may be distributed in accordance with the Public Records Act. If you have any questions or need additional information, please contact Lisa Tamres, Civil Rights Coordinator at (714) 438-8877.

Sincerely,

Michael L. Riley, Ph.D.
Director

/jb

Attachment

cc:

Mike Ryan, Chief Deputy Director
Carol Wiseman, Administrative Services Director
Jan Taraszkiwicz, Deputy Director
Lisa Tamres, Civil Rights Coordinator

**COUNTY RESPONSE TO
CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
Orange County Social Services Agency**

**Conducted on
July 23 – 27, 2012**

**County of Orange
Social Services Agency
888 N. Main Street
Santa Ana, CA 92701**

**Lisa Tamres
Civil Rights Coordinator
714-438-8877**

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

1. Facility Location: North Region, 3320 E. La Palma Avenue, Anaheim, CA

Facility Element	Findings	Corrective Action	County Response
Parking	Additional signage below the symbol of accessibility stating "Minimum Fine \$250" needed on only one accessible parking space across from the building.	An additional sign or additional language below the symbol sign of accessibility shall state "Minimum Fine \$250" (CA T24 1129B.4) p 134	Additional required signage has been installed per the regulation.
Men's Restroom	Door pressure too high at 15 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207	The door pressure has been adjusted to meet the regulation.
Women's Restroom	Accessible signage on door too high at 67" above the floor to the center line of sign.	Door sign and wall sign shall be 60" above the floor to the center line of sign. 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 287	The accessible signage has been replaced / relocated, and the door pressure has been adjusted to meet the regulation.

	<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 287</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207</p>	<p>Anaheim Regional Center is a leased facility, and as such the county is reliant upon the lessor to make major modifications to the building such as replacement of the fire alarm. Replacement of the fire alarm system has been deemed as too costly by the lessor and would not be considered a reasonable accommodation. County staff will continue to utilize the evacuation plan as noted to ensure all clients are escorted out in an emergency.</p>
	<p>Door pressure too high at 9 lbs. (outside door) 7 lbs. (inside door).</p>	<p>If emergency warning systems are provided, they should include both audible alarms and visual alarms.</p> <p>If emergency warning systems are required, they shall activate a means of warning the hearing impaired.</p> <p>(CA T24 1114B.2.2, ADA 4.28.1) p 242</p>
<p>Emergency egress</p>	<p>Emergency Alarm is audible, but is not also visual. However, the county does have an evacuation plan in which they go through the building to ensure all clients are escorted out in an emergency.</p>	

2. Facility Location: Manchester Office, 301 The City Drive South, Bldg. #44, Orange, CA

Facility Element	Findings	Corrective Action	County Response
Parking	<p>Additional signage below the symbol of accessibility stating "Minimum Fine \$250" needed on all accessible parking.</p> <p>"No Parking" painted on pavement needed on all accessible parking access aisles.</p>	<p>An additional sign or additional language below the symbol sign of accessibility shall state "Minimum Fine \$250" (CA T24 1129B.4) p 134</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".</p> <p>(CA T24 1129B.3.1) p 136</p>	<p>Additional required signage (including painting "No Parking" on the pavement where required) has been installed per the regulation.</p>
Men's Restroom	<p>Door pressure too high at 9 lbs.</p> <p>Soap dispenser too high at 55" at operable part.</p>	<p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207</p> <p>If towel, sanitary napkins, waste receptacles, and other similar</p>	<p>The door pressure has been adjusted and the soap dispenser has been relocated to meet the regulation.</p>

		<p>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</p>	
<p>Women's Restroom</p>	<p>Door pressure too high at 9 lbs.</p> <p>Soap dispenser too high at 43" at operable part.</p>	<p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207</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 T24 1115B.8.1.1) (ADA 4.19.6) p 296, 299, 304</p>	<p>The door pressure has been adjusted and the soap dispenser has been relocated to meet the regulation.</p>

3. Facility Location: North Region Sand Dollar, 1240 S. State College Blvd.,
Anahaim, CA

Facility Element	Findings	Corrective Action	County Response
Parking	Additional signage below the symbol of accessibility stating "Minimum Fine \$250" needed on all accessible parking.	An additional sign or additional language below the symbol sign of accessibility shall state "Minimum Fine \$250" (CA T24 1129B.4) p 134	Additional required signage has been installed per the regulation.
Men's Restroom	Door pressure too high at 8 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207	The door pressure has been adjusted to meet the regulation.
Women's Restroom	Door pressure too high at 9 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207	The door pressure has been adjusted to meet the regulation.

VII. STAFF DEVELOPMENT AND TRAINING

B. Corrective Actions

Training Area	Corrective Action	County Response
<p>MEPA Training for Children's Social Workers.</p>	<p>Orange County shall ensure that CSW's receive MEPA training to ensure that public contact staff has knowledge of, and properly apply the placement prohibitions contained in MEPA. 42 U.S.C. 672, 674, and 1996(b)</p> <p style="text-align: right;">* OK</p>	<p>MEPA (Multiethnic Placement Act) is designed to prohibit discrimination and prevent children from remaining in temporary care when they could be placed for foster care or adoption in homes regardless of race, color or national origin of a long term home. In Orange County Children & Family Services (CFS), the programs that make decisions about placement of children are Adoptions and Placement. The program visited (Investigations at the Manchester office) does not recruit or evaluate homes or make placements of children in homes. Although staff that were interviewed may not have been familiar with the term MEPA, CFS staff are aware that discrimination is prohibited, and to consider the cultural, ethnic, or racial background of a child and the capacity of an adoptive or foster parent to meet the needs of a child with that background when making a placement.</p> <p>Upon research of 42 U.S.C 672, 674 and 1996(b), no reference to MEPA Civil</p>

Training Area	Corrective Action	County Response
		<p>Rights requirements or MEPA training were found; however Orange County is planning to implement e-learning on MEPA for all CFS line workers. A 1-1/2 hour on line training has been confirmed with PCWTA and all CFS social worker series staff will be expected to complete the training by 6/30/13.</p>