



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

April 2, 2013

Susan Loew, Director
Riverside County Department of Public Social Services
4060 County Circle Drive
Riverside, CA 92503

Dear Ms. Loew:

This letter is to advise you that the Corrective Action Plan you submitted in response to the results of our June 18, 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: Hilary Brown, Administrative Service Manager 1/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

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Refugee Programs Bureau

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

Jodie Berger, Regional Counsel
Legal Services of Northern California

**RIVERSIDE COUNTY
DEPARTMENT OF PUBLIC SOCIAL SERVICES**

CORRECTIVE ACTION PLAN

**FOR
CIVIL RIGHTS
COMPLIANCE REVIEW CONDUCTED
June 18 – 31, 2012**

**Riverside County Department of Public Social Services
Human Resources/Administrative Compliance Services**

**10281 Kidd Street
Riverside, California 92503
(951) 358-3030**

Riverside County
Department of Public Social Services
Corrective Action Plan

I. INTRODUCTION

The California Department of Social Services (CDSS) staff conducted a Civil Rights Compliance Review of Riverside County Department of Public Social Services (RCDPSS) June 18 -21, 2012. CDSS found that RCDPSS was in substantial compliance with the CDSS Manual of Policies and Procedures (MPP) Division 21 regulations, as well as other applicable State and Federal civil rights laws.

CDSS did note a few areas that need improvement. Specifically, CDSS found that the Reynolds Road site where fair hearings are held is not fully accessible. Although RCDPSS was found to have improved in the areas of documentation of language services and on-going staff training, additional work still needs to be done.

This Corrective Action Plan (CAP) will outline RCDPSS' plan for addressing the issues identified during the 2012 compliance review. Included in our plan are the steps we will take to correct the deficiencies and the estimated timelines for completion (or date of implementation for on-going efforts such as staff development).

II. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The Federal regulations require that structural architectural barriers be removed in public areas of existing facilities when their removal is readily achievable (i.e., without much difficulty or expense).

The county must ensure that programs and activities are readily accessible to individuals with disabilities. Priorities include accessibility and availability of accessible parking, accessible approach and entrance to facilities, as well as accessibility to public telephones and restrooms.

CDSS staff evaluated the following Riverside County DPSS facilities during the course of their review:

- Jurupa Self-Sufficiency and Adult Services (CalWORKs, CalFresh, IHSS)
5961 Mission Boulevard, Riverside
- Norco Self-Sufficiency (CalWORKs, CalFresh)
3178 Hamner Avenue, Norco
- Temecula Self-Sufficiency (CalWORKs, CalFresh)
43264 Business Park Drive, Temecula

- Moreno Valley Self-Sufficiency, Children's Services, and Adult Services
 (CaWORKs, CalFresh, ER, FM/FR, IHSS)
 23119 Cottonwood Avenue, Moreno Valley

Findings and Corrective Actions

Facility Location # 1: Jurupa Self Sufficiency and Adult Services, 5961 Mission Boulevard, Riverside

Facility Element	Findings	Corrective Action Required	Target Completion Date
Restrooms	1) Door pressure to open doors was too high; (men's = 12 lbs.; women's = 12 lbs.).	1) Force to open doors, exterior and interior, shall be 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b))	1) 03/04/13

Facility Location # 2: Temecula Self-Sufficiency, 43264 Business Park Drive, Temecula

Facility Element	Findings	Corrective Action Required	Target Completion Date
Parking	1) There is only one designated accessible parking space; need 2.	1) For every 25 general parking spaces, one accessible space is required. (CA T24 1129B.1; ADA 4.1.2(5)(a))	1) 03/04/13
	2) Pavement markings were so faded that visibility is limited.	2) Pavement signage shall be 36"x36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.1 & 2)	2) 03/04/13
	3) Additional signage below freestanding symbol signage noting fine assessment was missing.	3) Additional sign below the symbol sign shall state "Minimum Fine \$250.00". (CA T24 1129B.4.1)	3) 03/04/13

Facility Element	Findings	Corrective Action Required	Target Completion Date
Parking (continued)	4) The words "No Parking" were not painted in the access aisle.	4) The words "No Parking" shall be painted on the ground in each loading/unloading access aisle in white letters no smaller than 12". (CA T24 1129B.3.2)	4) 03/04/13
	5) Access aisle for the designated accessible space does not connect to an accessible path of travel to the sidewalk (curb extends into path of travel); walkways minimum must be 48".	5) Access aisles must connect to the accessible path of travel, including curb cuts or ramps as needed. (CAT24 1129B.3.3, ADA 4.6.3;(CA T24 1133B.7.1)	5) 03/04/13
Building Entrance	1) Building entrance door pressure measured at 18 lbs.	1) Force to open doors, exterior and interior, shall be 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b))	1) 03/04/13
Restrooms	1) Door pressure for entering restrooms measured approximately 10 lbs. (both men's & women's).	1) Force to open doors, exterior and interior, shall be 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b))	1) 03/04/13
	2) Toilet seat protectors mounted on back wall too high and behind toilets (both men's and women's).	2) When dispensing or disposal fixtures are provided, at least one of each type must be located with all operable parts at a maximum height of 40 inches. (CA T24 1115B.8.3, ADA 4.23.7)	2) 03/04/13

Facility Location # 3 & 4: Norco Self-Sufficiency, 3178 Hamner Avenue, Norco

Facility Element	Findings	Corrective Action Required	Target Completion Date
Parking	1) The signage designating accessible parking spaces was missing the sign regarding minimum fines.	1) An additional sign below the international symbol of accessibility sign shall state "Minimum Fine \$250.00". (CA T24 1129B.4.1)	1) 03/04/13
	2) Both ground painting and van accessible sign so faded as to render it "not visible".	2) Pavement signage shall be 36"x36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.1 &2)	2) 03/04/13
	3) Route/path from parking space to main door has obstructions (free standing sign and in-ground landscape plant). <u>NOTE:</u> An alternative route is available, but no signage directing individuals to the walkway. This route has a 21-foot long ramp with no railings (slope from 4.8 to 7.5 degrees).	3) Safe continuous uninterrupted path with 48" width is to serve the building. (CA T24 1133B.7.1) Ramps longer than 6' shall have hand railings on both sides. (CA T24 1133B.5.5.1, ADA 4.8.5(1))	3) 03/04/13
Lobby/Reception	1) The height of the information (greeter) window in reception measured 42 ½ inches from the floor.	1) Height of accessible tables or counters is to be between 28-34" from the floor. (CA T24 1122B.4, ADA 4.32.4)	1) 03/04/13

Facility Element	Findings	Corrective Action Required	Target Completion Date
Restrooms	1) Door pressure for entering restrooms measured approximately at 10 lbs. (both men's & women's).	1) Force to open doors, exterior and interior, shall be 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b))	1) 03/04/13

Facility Location # 5: Moreno Valley, Building A, 23119 Cottonwood Avenue, Moreno Valley

Facility Element	Findings	Corrective Action Required	Target Completion Date
Parking	1) Pavement markings were so faded that visibility is limited.	1) Pavement signage shall be 36"x36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.1 & 2)	1) 03/04/13
	2) Neither of the 2 designated accessible parking spaces were van accessible.	2) One in every 8 accessible spaces (no fewer than 1) shall be designated van accessible. (CA T24 1129B.3.2, ADA 4.1.2(5)(b))	3) 03/04/13
	3) The signage designating accessible parking spaces was missing the sign regarding minimum fines.	3) Additional sign below the symbol sign shall state "Minimum Fine \$250.00". (CA T24 1129B.4.1)	3) 03/04/13

Facility Element	Findings	Corrective Action Required	Target Completion Date
Restrooms	1) There was no wall signage for the women's accessible restroom.	1) The sign shall be installed on the wall adjacent to the latch outside of door. If no space, the sign shall be placed on the nearest wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6)	1) 03/04/13
	2) Door pressure for entering restrooms measured approximately 27 lbs. for the women's and 17 lbs. for the men's.	2) Force to open doors, exterior and interior, shall be 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b))	2) 03/04/13
	3) Dispensers for toilet seat covers were mounted 60" from the floor.	3) When dispensing or disposal fixtures are provided, at least one of each type must be located with all operable parts at a maximum height of 40 inches. (CA T24 1115B.8.3, ADA 4.23.7)	3) 03/04/13

**Facility Location # 6: Moreno Valley, Building C, 23119 Cottonwood Avenue,
 Moreno Valley**

Facility Element	Findings	Corrective Action Required	Target Completion Date
Parking	1) Pavement markings were so faded that visibility is limited.	1) Pavement signage shall be 36"x36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.1 & 2)	1) 03/04/13
	2) The signage designating accessible parking spaces was missing the sign regarding minimum fines.	2) Additional sign below the symbol sign shall state "Minimum Fine \$250.00". (CA T24 1129B.4.1)	2) 03/04/13
Restroom	1) Door pressure measured approximately 10 pounds for women's restroom and 12 pounds for men's.	1) Force to open doors, exterior and interior, shall be 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b))	1) 03/04/13

Accessibility Review of Administrative Hearing Site – 3950 Reynolds Road, Riverside

Facility Element	Findings	Corrective Action Required	Target Completion Date
Parking	1) Current designated accessible parking is located on the far side of the building, farther away from the entrance than if provided at the first driveway entrance. There is signage directing the public to that existing parking, but it is not visible as one approaches the building's first driveway. It was decided that the best alternative would be to move the designated accessible spaces to the near side of the building (at the first driveway). Pavement markings were so faded that visibility is limited.	1) Move the designated accessible parking to the first entrance driveway.	1) 03/04/13

Facility Element	Findings	Corrective Action Required	Target Completion Date
Building Access	<p>1) The amount of force required to open the entrance door measured approximately 25 pounds and the design of the door does not allow it to be opened with a closed fist. This finding basically renders this site non-accessible. It was reported to this reviewer that the issue of the door/entrance is already being addressed, with a recommendation put forth to install an automatic opener.</p>	<p>1) Provide access to the building by automatic opener.</p>	<p>1) Completed</p>
	<p>2) There are three hearing rooms at the site, with two of them totally accessible. Agreement was made to label (with appropriate ISA signage) one as the designated accessible hearing room to be utilized as appropriate for individuals needing accommodations.</p>	<p>2) Designate one of the hearing rooms as accessible with appropriate ISA signage.</p>	<p>2) 03/04/13</p>

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

CDSS MMP Division 21 requires counties 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 delay. Counties must make written materials available in individuals' primary languages when the forms and materials are provided by CDSS, and information inserted in notices of action must also be in the individuals' primary language. Additionally, counties must provide effective communication and services for persons with hearing, speech, vision, or manual skill disabilities.

No corrective action 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 having a disability, and an applicant/recipient's request for auxiliary aids and services.

Findings and Corrective Actions

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
Documentation that bilingual services were provided (interpreters).	1) RCDPSS must ensure that all staff document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. (Div. 21-116.22)	1) Include information in e-Blast.	1) 05/01/13

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
<p>Documenting Offer of Translated Written Material/Forms</p>	<p>1) DPSS needs to provide additional instruction to the staff in the use of the correct version of Form 3167 since that is the method adopted to document the offer of translated material made to non-English speaking/limited-English speaking clients.</p>	<p>1) Include information in e-Blast. 2) Send e-mail to district offices requesting discarding all prior versions of form 3167.</p>	<p>1) 05/01/13 2) 04/15/13</p>
	<p>2) CPS workers need to implement use of the Form 3167 or provide alternative documentation of their offer of translated material. Documentation of such an offer is required in all programs. (Div. 21-116.21)</p>	<p>3) Contact Children's Services managers to remind them of staff's responsibility to document offer of translated materials. 4) Include article in Children's Services newsletter regarding the need to document offer of translated materials.</p>	<p>3) 04/15/13 4) 05/30/13</p>

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 in the continuing training programs.

Findings and Corrective Actions

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
On-going civil rights training	1) Each public contact employee shall receive training in the requirements of Division 21. These requirements of Division 21 shall be incorporated into the content of orientation and continuing training programs. (Div. 21- 117.1)	1) Provide mandatory on-line training on Division 21 requirements. 2) Continue disseminating information on Division 21 requirements via on-going e-Blasts and articles in various department newsletters.	1) 05/01/13 2) In progress

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.

Findings and Corrective Actions

Compliance Finding/Comment	Corrective Action Required	Action Item	Target Completion
On-going Civil Rights/Division 21 training discussed in the prior section on Staff Development should include discussion of the differences in types of client complaints and the processes to resolve those complaints.	1) On-going Civil Rights/Division 21 training should include discussion of the differences in types of client complaints and the processes to resolve those complaints.	1) Provide mandatory on-line refresher training to all staff regarding complaint procedures, which will include information about the content and location of informing posters (i.e., Pub 86 at all offices and AD 475B for offices that provide CalFresh benefits).	1) 05/01/13
		2) Include complaint procedure information in e-Blasts.	2) In progress

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

Provision was made in Section 1 of the approved 2011-2012 Civil Rights Plan for the Assurance of Compliance Statement to be obtained from each contractor providing additional services to RCDPSS customers.

No corrective action required.