



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](http://www.cdss.ca.gov)



EDMUND G. BROWN JR.  
GOVERNOR

November 22, 2013

Jerry Dunn, Director  
Sonoma County Human Services Department  
2550 Paulin Drive  
P.O. Box 1539  
Santa Rosa, CA 95402-1539

Dear Mr. Dunn:

This letter is to advise you that the updated Corrective Action Plan you submitted November 5, 2013, in response to the results of our May 20-24, 2013 Civil Rights Compliance Review is approved.

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

If you have any questions, please contact Tiffany Marsh at (916) 651-6242 or by e-mail at [Tiffany.Marsh@dss.ca.gov](mailto:Tiffany.Marsh@dss.ca.gov).

Sincerely,

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

c: Roy Redlich , Civil Rights Coordinator

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

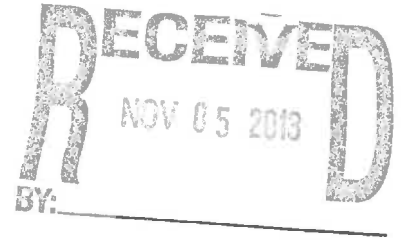
Joe Torres, Office of Civil Rights  
USDA Food and Nutrition Services  
Supplemental Nutrition Assistance Program (SNAP)  
Western Region

Andrew Riesenber  
USDA Food and Nutrition Services  
Supplemental Nutrition Assistance Program (SNAP)  
Western Region

Jodie Berger, Regional Counsel  
Legal Services of Northern California



**Human Services Department**  
COUNTY OF SONOMA



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tel (707) 565-5750  
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**Gail Goring, Director**  
Fisc-Ops  
tel (707) 565-5855  
fax (707) 565-5890

November 4, 2013

**James Tashima, Chief**  
CDSS, Civil Rights Bureau  
Office of Human Rights and Community Services Division  
744 P Street, M/S 8-16-70  
Sacramento, CA 95814

**RE: Updated Report on Civil Rights Corrective Action Plan**

Dear Mr. Tashima:

As you requested the enclosed report provides an update to Sonoma County's Corrective Action Plan which you approved in your August 27, 2013 letter.

I am happy to report that all of the items that were noted in our August 2013 Corrective Action Plan have now been completed.

If you require additional information or need any clarification, please contact Roy Redlich, Civil Rights Coordinator, at (707) 565-5863 or [rredlich@schsd.org](mailto:rredlich@schsd.org).

Sincerely,

**Jerry Dunn**  
Director

JD/rr

enclosure

**SONOMA COUNTY HUMAN SERVICES DEPARTMENT  
CIVIL RIGHTS COMPLIANCE REVIEW  
CORRECTIVE ACTION PLAN UPDATE**

November 4, 2013

**SECTION IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**

**Corrective Actions:**

1. **The signage designating accessibility for both the men's and women's restroom at the Paulin Building was too high. The door sign and wall sign shall be 60" above the floor to the center-line of the sign. (CA T24 1117B5.7) (ADA 4.30.6) p287.**

On October 15, 2013 the signs were relocated to the proper height to comply with the above cited regulations.

2. **The force required to open the doors at the required men's and women's restroom at the Paulin Building is excessive at 8 pounds of force. Force to open interior doors shall be 5 pounds maximum (CA T24 1133B.2.5) (ADA 4.13.11 (2)(a)&(b)).**

On October 15, 2013 the door closers were adjusted and now require less than 5 pounds force to open.

3. **Access to the Mendocino Avenue building requires travel up ramps that are too narrow, measuring between 44 and 45 inches. The width of the ramps is as required for stairways and exits. Pedestrian ramps shall have a minimum width of 48". (CA T24 1133B.5.2) p 147.**

Because the ramps abut large load-bearing columns there is no feasible way to fix this problem. Please refer to the letter dated September 13, 2013 from the City of Santa Rosa (Attachment 1) which permits the ramp to remain as is.

4. **The door pressure measured approximately 11 pounds for entry into the Mendocino building. Force to open doors, exterior and interior, shall be 5 pounds maximum (CA T24 1133B.2.5) (ADA 4.13.11 (2)(a) & (b) p 207).**

Extensive remodeling of the lobby area in the leased space at the Mendocino Building was conducted in September and October 2013. After the remodeling was completed the exterior and interior doors of the facility were adjusted to comply with the regulations cited above.

5. **There is no audible or visual alarm in the lobby of the Mendocino Building for emergency warnings. If emergency warning systems are provided (e.g. fire alarms) they should include both audible and visual alarms. (CA T24 1114B.202) (ADA 4.28.1) p 242.**

The audible fire alarm is wired to the sprinkler system. In the event the fire alarms are activated, the sprinklers would be deployed providing a visual (and tactile) signal to leave the building.

6. **Wall signage is not displayed adjacent to the door latches of the men's and women's restroom at the Mendocino Building. Signs shall be installed on the wall adjacent to the latch outside of each door. (CA T24 1117B5.7) (ADA 4.30.6) p287.**

Signage was installed September 30, 2013 to comply with the regulation cited above.

7. **The force required to open the doors at the required men's and women's restroom at the Mendocino Building is excessive at 10 pounds of force. Force to open interior doors shall be 5 pounds maximum (CA T24 1133B.2.5) (ADA 4.13.11 (2)(a)&(b)).**

On September 30, 2013 the door closers were removed eliminating the need for excessive force to open the doors.

8. **The pipe under the sink in the men's restroom at the Mendocino Building is not securely insulated. Hot water and drain pipes must be insulated or covered (CA T24 115B.4.3.4) (ADA 4.19.4) p 296.**

On September 30, 2012 the pipes under the sink have been insulated to comply with the regulation cited above.

## **SECTION VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**

### **Corrective Actions:**

1. **Documentation that bilingual services were provided. HSD must take measures to ensure that 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.**

The reviewer found that for the CalWORKs and Non-Assistance CalFresh (NACF) programs there was inconsistent documentation of the method used to provide bilingual services. On August 21, 2013 a memo was sent to all HSD employees reminding them to document how language services were provided (see Attachment 2). On September 26, 2013 face-to-face training was conducted on this topic for all workers in the CalFresh and CalWORKs programs. This was accomplished through one presentation at the SonomaWORKS Tech Meeting at Capricorn Way, two presentations at Economic Assistance Tech Meetings at Mendocino Avenue, and two presentations to at the Economic Assistance Tech Meetings at Paulin. Refer to Attachment 3 for meeting agendas.

**2. Documentation of bilingual services must be kept in the case file. Div. 21-116.**

All Human Services Department employees are instructed to use and preserve form HSD 1259 in every case file for the life of the case. The August 21, 2013 memo (Attachment 2) sent to all HSD employees reminded them to maintain documentation of language services in the case file.

## **SECTION VIII. DISCRIMINATION COMPLAINT PROCEDURES**

### **Corrective Action:**

**1. Discrimination Process: HSD shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div 21-117 and 21-203.**

The reviewer found that two out of the 15 HSD staff interviewed could not clearly distinguish the difference between a program complaint, a discrimination complaint, and a personnel complaint. On October 22, 2013 a message was sent to all HSD Staff to remind them of the differences between program complaints, civil rights violations, and requests for hearings. Please refer to Attachment 4. The Department plans to issue a reminder message on this topic annually. In addition, at each orientation for new employees staff are taught the differences between various types of complaints and how each should be handled.

## **LIST OF ATTACHMENTS**

1. Letter from City of Santa Rosa dated September 13, 2013
2. Message sent to all HSD Staff on August 21, 2013
3. Agendas for meetings on September 26, 2013 with CalFresh and CalWORKs workers
4. Message sent to all HSD Staff on October 22, 2013



September 13, 2013

Michael J. Palmer, AIA

RE; Tenant Improvements for Sonoma County Human Services  
520 Mendocino Avenue  
B13-2526

Dear Mr. Palmer;

Through discussion and research into the feasibility of creating a compliant accessible ramp at the location identified, the Chief Building Official and I have determined it is technically infeasible to create a complaint ramp at the location. Due to the physical location and structural barriers present, the ramp may remain as-is in accordance with CBC 104.10.

Sincerely,

Jesse Oswald  
Permit Intake Manager  
City of Santa Rosa

**From:** [Human Services Training](#)  
**To:** [HSD-All](#)  
**Subject:** Civil Rights Reminder  
**Date:** Wednesday, August 21, 2013 10:45:23 AM  
**Attachments:** [image001.jpg](#)  
[image003.jpg](#)

## DOCUMENTING LANGUAGE SERVICES

HSD staff are required to document:

- the client's request for and use of forms and Notices of Action in their primary language;
- the client's refusal of forms and Notices of Action in their primary language;
- the client's request for and use of interpretive services or auxiliary aids; and
- the client's refusal to use interpretive services or auxiliary aids.

At intake this essential information should be documented in the case record by using the **HSD 1259 "Language Preference and Auxiliary Aid Identification"** form. The form does not have to be completed at annual renewal if the original form can be found in the file and there have been no changes regarding needs for language services or auxiliary aids.

In May 2013 the California Department of Social Services Civil Rights Bureau conducted an audit to review Sonoma County's compliance with civil rights regulations. Overall the state found that the Human Services Department is in substantial compliance with the regulations, and noted that HSD staff are "warm, welcoming, informative and very supportive." One aspect of the audit report noted that improvement could be made in documenting the method used to provide bilingual services such as "the assigned worker is bilingual" or "another bilingual employee acted as interpreter" or "Language Line interpreter was used" or "client provided interpreter."

The HSD 1259 documents whether someone needs interpreter services but does not document how those needs are met. Workers should document in the case comments how the Department accommodated the client's language needs for each interaction

No. 1259 \_\_\_\_\_ Date: 8/21/2013  
**Language Preference and Auxiliary Aid Identification**  
 Language Services Rights  
 "You have the right to this interpreter service to help you understand and use your rights and services. If you need this interpreter service to speak, understand, and read your application, benefits, services contracts or other documents, please tell us what language you prefer to speak."  
 \_\_\_\_\_ My primary language is English and I do not need an interpreter or I can.  
 \_\_\_\_\_ My primary language is Spanish and I need an interpreter service.  
 \_\_\_\_\_ My primary language is \_\_\_\_\_ and I need an interpreter for this.

**Written Language Needs**  
 "You have the right to written information and forms in your primary language if they have not been provided only in English for the California Department of Social Services (CDSS). However, the agency will document the information that you need help with. Please tell us what language you prefer for written information and forms."  
 \_\_\_\_\_ I need written information and forms used or given to me in English.  
 \_\_\_\_\_ I need written information and forms used or given to me in \_\_\_\_\_ as my primary language.

**Assisting Help**  
 "You have the right to request, and the County should provide, the use of TDD, large print, Braille, electronic, etc. to help you communicate with us."  
 I need the following to help me communicate: \_\_\_\_\_

Signature of Client/Representative \_\_\_\_\_ Date \_\_\_\_\_  
 Signature of HSD Staff \_\_\_\_\_ Date \_\_\_\_\_  
 Signature of Interpreter/Translator \_\_\_\_\_ Date \_\_\_\_\_



**Medi-Cal:** Monica Gomez  
**CMSP:** Dawn Moore  
**CalFresh:** Shaydra Ennis  
**General Assistance:** Greg Baker  
**CalHEERS/HCR:** Janelle Aman  
**CalWIN:** Help Desk

**September 26,**  
**2013**  
*Laurel/Sequoia*

**Mendo: 8:15 to 9:30 AM**  
**10:00 to 11:15 AM**  
  
**Paulin: 2:15 to 3:15 PM**  
**3:30 to 4:30 PM**

## SAFETY/GUESTS/NEWS

1. **Safety** – <http://gma.yahoo.com/blogs/abc-blogs/sliders-crime-wave-hits-motorists-131443338.html?vp=1>  
**Guest** – Nick Yanez: *Documenting the Provision of Bilingual Services*

## CMSP/Path2Health

1. **ACL 1309-** Persons denied Medi-Cal due to Excess Resources.
2. **ACA informing notices** in app packets.

## CALFRESH

1. **Client Residency Verifications in CalWIN** - Do not use 'Client Statement' as verification for Residency. After the case gets approved and sent over to Mendo, it does not issue benefits to the person who has that type of verification. Use 'OCV' or actual verification.
2. **COLA/SNAP Benefit Reductions** - CalWIN is generating a notice to all CalFresh participants regarding the COLA and SNAP Benefit Reductions at the end of September. Please feel free to refer to your talking points (sent 9/23) if clients call with questions.
3. **Reminder: MCE BENDS 6258** - Please continue to use the Tribal TANF workaround for HH's who are over net and under gross income for MCE/BBCE instead of using the prior aid CW entry. The cases will still need to be passed to EBCE to manage. The link is here: **BENDS 6258 Modified Categorical Eligibility**.
4. **Transitional CalFresh-** The State misinterpreted the Federal rules on Transitional CalFresh, so who is allowed to receive TCF will be changing. Impact on staff is not known yet. A final ACL will be issued in October.

## GA

1. **NVRA** - NVRA is required.

## CALHEERS/HEALTH CARE REFORM

1. **HCR Workflows**  
 Paulin: In-Person, Now, Later  
 Mendo: Quick Sort Transfer, Now, Later
2. **HCR Intranet Page- new items (at <http://hsd-intranet/ea/html/hcr.htm>)**
  - Aid Codes
  - Business Processes (coming)
  - Covered CA Metal Tier Options
  - Determining Eligibility under HCR (CWDA)-ppt & searchable doc
  - MAGI Summary
 Resources on the Web now includes:
  - Beyond the Basics: Putting it All Together webinar & ppt
  - COVERED CA REGULATIONS

## CALWIN HELP DESK

1. **SAR Over Income in App Month-** Workaround can be found in the CalWIN Intranet/Cheatsheets/CalFresh  
<http://hsd-calwin/html/cheat/SAROverIncomeinappmonth.docx>
2. **Upcoming Changes-** New CWEA Color Schemes!

**SonomaWORKS**  
**Staff/Tech Meeting Agenda**  
**09/26/2013 @ 3:00 PM**  
**Santa Rosa Room**

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- Civil Rights Update (Roy)
- United Way Presentation
- Steps to Success Presentation
- General Updates (Hope)
- IIPP – (Suzanne)
- TANF Handbook Updates (Tammy)
- WtW Handbook Updates (Cindy)
- Announcements (Fun Committee)

**Next meeting: October 24<sup>th</sup>, 2013**

**From:** [Human Services Training](#)  
**To:** [HSD-All](#)  
**Subject:** Civil Rights Reminder  
**Date:** Tuesday, October 22, 2013 11:23:27 AM  
**Attachments:** [image001.jpg](#)

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## THREE DIFFERENT TYPES OF COMPLAINTS



Most complaints can be categorized into one of three main types: department complaints; hearing requests, and discrimination complaints.

**Department complaints** which include customer service complaints are generally directed toward an employee or department policy. Employees should attempt to resolve these complaints at the lowest level possible, and immediately refer requests to speak to a supervisor or manager to the appropriate person.

**Hearing requests** are made when a client disagrees with an action taken by the department that negatively impacts their public assistance benefits or services. Clients may also request an appeal if an overpayment or overissuance has been established. The back of the notice of action provides instructions on how to file a request for a Hearing.

**Discrimination complaints** occur when there is an allegation that a client has been discriminated against based on membership in a protected class. Protected classes include those based on race, color, national origin, political affiliation, religion, marital status, gender, sexual orientation, age, or disability. Complaints alleging discriminatory practice should be referred to the Civil Rights Coordinator, Roy Redlich, by calling extension 5855.



WILL LIGHTBOURNE  
DIRECTOR

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EDMUND G. BROWN JR.  
GOVERNOR

August 27, 2013

Jerry Dunn, Director  
Sonoma County Human Services Department  
2550 Paulin Drive  
P.O. Box 1539  
Santa Rosa, CA 95402-1539

Dear Mr. Dunn:

This letter is to advise you that the Corrective Action Plan you submitted August 19, 2013, in response to the results of our May 20-24, 2013 Civil Rights Compliance Review is approved.

Please submit an updated report by November 15, 2013, providing confirmation of completion of the pending corrective actions. We will be monitoring the implementation of the corrective action items through your Civil Rights Coordinator.

If you have any questions, please contact Tiffany Marsh at (916) 651-6242 or by e-mail at [Tiffany.Marsh@dss.ca.gov](mailto:Tiffany.Marsh@dss.ca.gov).

Sincerely,

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

c: Roy Redlich , Civil Rights Coordinator

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CalFresh Policy Bureau

Marlene Fleming, Chief  
Field Operations Bureau

Brian Tam, Chief  
CalFresh Management Operations Section



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Please submit an updated report by November 15, 2013, providing confirmation of completion of the pending corrective actions. We will be monitoring the implementation of the corrective action items through your Civil Rights Coordinator.

If you have any questions, please contact Tiffany Marsh at (916) 651-6242 or by e-mail at [Tiffany.Marsh@dss.ca.gov](mailto:Tiffany.Marsh@dss.ca.gov).

Sincerely,

**JIM TASHIMA**, Chief  
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Human Rights and Community Services Division

c: Roy Redlich , Civil Rights Coordinator

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**Jodie Berger, Regional Counsel  
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**Human Services Department**  
COUNTY OF SONOMA



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**Marla Stuart, Director**  
Information Integration  
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**Gail Goring, Director**  
Fisc-Ops  
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August 19, 2013

**James Tashima, Chief**  
CDSS, Civil Rights Bureau  
Office of Human Rights and Community Services Division  
744 P Street, M/S 8-16-70  
Sacramento, CA 95814

RE: Civil Rights Plan Update

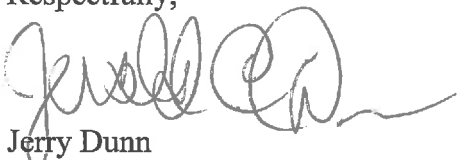
Dear Mr. Tashima:

Enclosed is the corrective action plan developed by the Sonoma County Human Services Department in response to the Civil Rights Compliance Review conducted by Ms. Tiffany Marsh of your staff on May 20-24, 2013.

Each of the required corrective actions and recommendations are described in the body of the report, including the person or entity responsible for the action and a timeline for completion.

If you require additional information or need any clarification, please contact Roy Redlich, Civil Rights Coordinator, at (707) 565-5863 or [rredlich@schsd.org](mailto:rredlich@schsd.org).

Respectfully,

  
**Jerry Dunn**  
Director

JD/rr

enclosure



*"Empower, Support, Protect"*

**Human Services Department**  
COUNTY OF SONOMA

**CIVIL RIGHTS COMPLIANCE REVIEW**

**CORRECTIVE ACTION PLAN**

August 19, 2013



**SONOMA COUNTY HUMAN SERVICES DEPARTMENT  
CIVIL RIGHTS COMPLIANCE REVIEW  
CORRECTIVE ACTION PLAN**

**August 19, 2013**

**INTRODUCTION**

In May 2013 the California Department of Social Services (CDSS) Civil Rights Bureau conducted a thorough audit of the Sonoma County Human Services Department's compliance with state regulations pertaining to nondiscrimination in federally assisted programs. This corrective action plan incorporates each element cited in the May 2013 civil rights compliance review report and defines corrective actions and time frames for completion.

The Sonoma County Human Services Department (HSD) is referred to throughout this report as "the Department." The Department's response to each of the sections of the Compliance Review Report is shown below.

**SECTION III. DISSEMINATION OF INFORMATION**

**Corrective Actions: None required.**

**SECTION IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**

**Corrective Actions:**

- 1. The signage designating accessible men's restroom at the Capricorn Building was too low. The door sign and wall sign shall be 60" above the floor to the center-line of the sign. (CA T24 1117B5.7) (ADA 4.30.6) p287.**

The Department worked with the property manager to relocate the signs to the proper height to comply with the above cited regulations. This correction was completed in August 2013.

- 2. Wall signage was not displayed adjacent to the door latch of the women's restroom at the Capricorn Building. The sign shall be installed on the wall adjacent to the latch outside of the door. (CA T24 1117B5.7) (ADA 4.30.6) p287.**

The Department worked with the property manager to install the required signage. This correction was completed in August 2013

- 3. The signage designating accessibility for both the men's and women's restroom at the Paulin Building was too high. The door sign and wall sign shall be 60" above the floor to the center-line of the sign. (CA T24 1117B5.7) (ADA 4.30.6) p287.**

Steve Fischer, the Department's Facilities Coordinator, is working with the County's Facility Operations Division to relocate the signs to the proper height to comply with the above cited regulations. The estimated completion date for correction of this deficiency is October 31, 2013.

4. **The force required to open the doors at the required men's and women's restroom at the Paulin Building is excessive at 8 pounds of force. Force to open interior doors shall be 5 pounds maximum (CA T24 1133B.2.5) (ADA 4.13.11 (2)(a)&(b)).**

Steve Fischer, the Department's Facilities Coordinator, is working with the County's Facility Operations Division to adjust and continue maintaining the door pressure at regular time intervals. The estimated completion date for correction of this deficiency is October 31, 2013.

5. **Access to the Mendocino Avenue building requires travel up ramps that are too narrow, measuring between 44 and 45 inches. The width of the ramps is as required for stairways and exits. Pedestrian ramps shall have a minimum width of 48". (CA T24 1133B.5.2) p 147.**

Steve Fischer, the Department's Facilities Coordinator, has discussed the ramp deficiency with the facility's landlord. Because the ramps abut large load-bearing columns there is no feasible way to fix this problem.

6. **The door pressure measured approximately 11 pounds for entry into the Mendocino building. Force to open doors, exterior and interior, shall be 5 pounds maximum (CA T24 1133B.2.5) (ADA 4.13.11 (2)(a) & (b) p 207).**

Steve Fischer, the Department's Facilities Coordinator, is working with the facility's landlord to reduce the door pressure to the proper level. The estimated completion date for correction of this deficiency is October 31, 2013.

7. **There is no audible or visual alarm in the lobby of the Mendocino Building for emergency warnings. If emergency warning systems are provided (e.g. fire alarms) they should include both audible and visual alarms. (CA T24 1114B.202) (ADA 4.28.1) p 242.**

Steve Fischer, the Department's Facilities Coordinator, is working with the facility's landlord to install audible and visual fire alarms in the lobby to comply with the above cited regulations. Extensive remodeling of the leased space in the Mendocino Building, including the lobby area, is planned for September 2013. The estimated completion date for correction of this deficiency is October 31, 2013.

8. **Wall signage is not displayed adjacent to the door latches of the men's and women's restroom at the Mendocino Building. Signs shall be installed on the wall adjacent to the latch outside of each door. (CA T24 1117B5.7) (ADA 4.30.6) p287.**

Steve Fischer, the Department's Facilities Coordinator, is working with the property manager to install the required signage. The estimated completion date for this correction is October 31, 2013.

9. **The force required to open the doors at the required men's and women's restroom at the Mendocino Building is excessive at 10 pounds of force. Force to open interior doors shall be 5 pounds maximum (CA T24 1133B.2.5) (ADA 4.13.11 (2)(a)&(b)).**

Steve Fischer, the Department's Facilities Coordinator, is working with the facility's landlord to reduce the door pressure to the proper level. The estimated completion date for correction of this deficiency is October 31, 2013.

10. **The pipe under the sink in the men's restroom at the Mendocino Building is not securely insulated. Hot water and drain pipes must be insulated or covered (CA T24 115B.4.3.4) (ADA 4.19.4) p 296.**

Steve Fischer, the Department's Facilities Coordinator, is working with the facility's landlord to insure the pipe under the sink is properly insulated. The estimated completion date for correction of this deficiency is October 31, 2013.

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

**Corrective Actions: None required**

#### **SECTION VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**

**Corrective Actions:**

1. **Documentation that bilingual services were provided. HSD must take measures to ensure that 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.**

The reviewer found that for the CalWORKs and Non-Assistance CalFresh (NACF) programs there was inconsistent documentation of the method used to provide bilingual services. Workers in those program record their interactions with clients in the case comments subsystem of the CalWIN program. The Department will issue a reminder to all staff regarding the need to document in each interaction how bilingual services were provided. In addition face-to-face training will be provided in the staff meetings for both CalWORKs and NACF programs. It is expected that the Department will issue this reminder and conduct the training by December 31, 2013.

**2. Documentation of bilingual services must be kept in the case file. Div. 21-116.**

All Human Services Department employees are instructed to use and preserve form HSD 1259 in every case file. The HSD 1259, the Language Preference and Auxiliary Aid Identification form, should be completed at intake and retained in the case file for the life of the case. All staff in the Department will receive instructions reminding them to use, file, and retain this form. Roy Redlich, the Department's Civil Rights Coordinator, will issue this instruction to staff by October 31, 2013.

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

**Corrective Action: None required**

## **SECTION VIII. DISCRIMINATION COMPLAINT PROCEDURES**

**Corrective Action:**

- 1. Discrimination Process: HSD shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div 21-117 and 21-203.**

The review found that out of the 15 HSD staff interviewed two could not clearly distinguish the difference between a program complaint, a discrimination complaint, and a personnel complaint. All HSD staff will receive a reminder regarding the differences between various types of complaints and how to determine whether they should be referred to a Fair Hearing, or the Civil Rights Coordinator, or an employee's supervisor/manager. Roy Redlich, the Department's Civil Rights Coordinator, will issue this reminder by October 31, 2013 and annually thereafter.

## **SECTION IX. CIVIL RIGHTS COMPLIANCE PLAN**

The Human Services Department's Civil Rights Compliance Plan for the period of May 1, 2013 through April 30, 2014 was submitted timely and approved as submitted.

## **CONCLUSION**

The Department is committed to complying with Division 21 regulations and ensuring that clients are treated fairly and are given the opportunity to access programs and services. It is encouraging to learn the CDSS review found Sonoma County to be in substantial compliance with the regulations, and the Department is working to correct the deficiencies that were noted. The Department looks forward to continued positive interactions with the CDSS Civil Rights Bureau.