



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

January 27, 2014

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

Dear Ms. Spiller:

This letter is to advise you that the Corrective Action Plan you submitted on November 7, 2013, in response to the results of our June 25 – July 2, 2013, 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 Daniel Cervantes at (916) 654-0946. You may also contact your consultant by e-mail at [Daniel.Cervantes@dss.ca.gov](mailto:Daniel.Cervantes@dss.ca.gov).

Sincerely,

***Original signed by Civil Rights Bureau Chief***

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

c: Charles Palmer, Civil Rights Coordinator

Mike Papin, Chief  
CalFresh Policy Bureau

John Mason, Chief  
Field Operations Bureau

Sysvanh Kabkeo, Chief  
CalFresh Management Operations Section

Taadhimeka Haynes  
Staff Services Manager I

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

Jodie Berger, Regional Counsel  
Legal Services of Northern California

**CDSS CIVIL RIGHTS COMPLIANCE REVIEW  
FISCAL YEAR 2012-13**

**DPSS RESPONSE TO  
FINDINGS AND CORRECTIVE ACTIONS**

**I. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**

**SOUTHWEST FAMILY #83, 8300 S. Vermont Ave., Los Angeles, CA**

**FACILITY ELEMENT: MEN'S RESTROOM**

**FINDING:**

1. Restroom door pressure excessive at 10 lbs.

**CORRECTIVE ACTION:**

Interior door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201.

**DPSS RESPONSE TO 1:**

The Building Engineer adjusted door pressure to 5 lbs. to comply with ADA regulations.

**Completed:** July 3, 2013

**FACILITY ELEMENT: WOMEN'S RESTROOM**

**FINDING:**

2. Restroom door pressure excessive at 11 lbs.

**CORRECTIVE ACTION:**

Interior door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201.

**DPSS RESPONSE TO 2:**

The Building Engineer adjusted door pressure to 5 lbs. to comply with ADA regulations.

**Completed:** July 3, 2013

**FACILITY ELEMENT: EXTERIOR ENTRANCE**

**FINDING:**

3. Door pressure excessive at 12 lbs.

**SOUTHWEST FAMILY #83, 8300 S. Vermont Ave., Los Angeles, CA (Cont'd)**

**FACILITY ELEMENT: EXTERIOR ENTRANCE (Cont'd)**

**CORRECTIVE ACTION:**

Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a)&(b)) p 207.

**DPSS RESPONSE TO 3:**

The Building Engineer adjusted door pressure to 5 lbs. to comply with ADA regulations.

**Completed:** July 3, 2013

**IHSS CHATSWORTH, 21615 Plummer St., Chatsworth, CA 91311**

**FACILITY ELEMENT: PARKING**

**FINDING:**

4. No van accessible parking space near building's main entrance. Accessible parking space too short at 16 feet.

**CORRECTIVE ACTION:**

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)) p 136.

Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p 135.

Access aisles should be located on the passenger side of a space, and should be a minimum of 18' long by 5' wide for aisles, serving car accessible spaces, and minimum of 18' by 8' wide for aisles serving van accessible spaces. (CA T24 1129B.3.1) (ADA 4.6.3.)

**DPSS RESPONSE TO 4:**

The Van Accessible parking space was corrected by Internal Services Department (ISD) to meet ADA regulations on October 21, 2013.

**Completed:** October 21, 2013

**GAIN REGION IV, 3833 S. Vermont Ave., Los Angeles, CA**

**FACILITY ELEMENT: MEN'S RESTROOM**

**FINDING:**

5. Restroom door pressure excessive at 11 lbs.

**GAIN REGION IV, 3833 S. Vermont Ave., Los Angeles, CA (Cont'd)**

**FACILITY ELEMENT: MEN'S RESTROOM (Cont'd)**

**CORRECTIVE ACTION:**

Interior door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201.

**DPSS RESPONSE TO 5:**

The Building Engineer adjusted door pressure to 5 lbs. to comply with ADA regulations.

**Completed:** July 2, 2013

**FACILITY ELEMENT: WOMEN'S RESTROOM**

**FINDING:**

6. Restroom door pressure excessive at 15 lbs.

**CORRECTIVE ACTION:**

Interior door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201.

**DPSS RESPONSE TO 6:**

The Building Engineer adjusted door pressure to 5 lbs. to comply with ADA regulations.

**Completed:** July 2, 2013

**II. FACILITY AVAILABILITY OF LANGUAGE SERVICES**

**LOS ANGELES COUNTY DPSS**

**AREA OF FINDING: BILINGUAL STAFFING**

**FINDING:**

7. Bilingual Staff

**CORRECTIVE ACTION:**

Los Angeles County Department of Public Social Services shall ensure that a sufficient number of qualified bilingual employees shall be assigned to positions and locations serving a substantial number of non-English-speaking persons. Div. 21-115.1

## **AREA OF FINDING: BILINGUAL STAFFING (Cont'd)**

### **DPSS RESPONSE TO 7:**

As of July 1, 2013, the Civil Rights Section (CRS) implemented a review of each office's Bilingual Authorization Report during the biennial district Civil Rights Reviews. The report is being used as a review tool to assess if each individual office has sufficient number of qualified bilingual employees assigned to positions and locations serving our limited-English proficient population. If an office has an insufficient number of qualified bilingual employees based on the Bilingual Authorization report, it is reported in our Civil Rights Summary of Findings Report. Offices are responsible for taking corrective action and reporting compliance 30 days after the Civil Rights Summary of Findings Report is completed.

In addition, CRS will emphasize bilingual staffing compliance in the bi-annual Civil Rights Liaisons meetings, through an annual Civil Rights Memo. This is in preparation of the April yearly submission of the Annual Civil Rights Compliance Plan to CDSS. The purpose of the memo is to ensure that the offices are aware of the bilingual staffing levels and make necessary adjustments in compliance with CDSS Division 21-115.1

**Target Date:** November 7, 2013

### **NOVEMBER 2013 UPDATE:**

On November 25, 2013, DPSS released the Department Bilingual Staffing Status Report to the offices to emphasize bilingual staffing compliance with CDSS Division 21.115.1

**Completed:** November 25, 2013

## **COMMUNITY/ADVOCATE INPUT**

### **RECOMMENDATIONS:**

#### **1. Number of Bilingual Staff**

It is important that a client is never denied the right to free interpretive services, and receives interpretive services without undue delay. County workers should be knowledgeable, proficient, and encouraged to use the language line. CDSS recommends that all LADPSS workers be reminded and encouraged to use the language line when appropriate and necessary to ensure that client receive services clearly and without delay. Division 21-115 states:

County welfare departments shall ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English speaking population and individuals with disabilities. The provision of bilingual/interpretive services shall be prompt without undue delays. This need shall be met as indicated below:

## **COMMUNITY/ADVOCATE INPUT (Cont'd)**

### **RECOMMENDATIONS: (Cont'd)**

Further, Division 21-115.15 states:

When the percentage of non-English cases in a program and/or location is less than five percent, the agency shall ensure that effective bilingual services are provided. This requirement may be met through utilization of paid interpreters, qualified bilingual employees, qualified employees of other agencies or community resources.

#### **DPSS RESPONSE TO 1:**

DPSS employees are instructed to always inform limited-English proficient applicants and participants (clients) that they have the right to free interpreter services. Upon greeting a limited-English proficient individual in person or by telephone, public contact staff renders services without undue delay in the appropriate language. Aside from instructions/policies received during biennial Civil Rights Training conducted by the Academy, CRS released a Civil Rights Reference Guide to ensure that services are provided to applicants/participants effectively in their preferred language for verbal and written communications. If a certified bilingual DPSS employee is not available in the participant's language, the office's Civil Rights Liaison will initiate a conference call with AVAZA for over-the-phone interpreter services.

In addition, as of July 1, 2013, the CRS implemented a review of each office's Bilingual Authorization Report during the biennial district Civil Rights Reviews. Report will be used to assess if each individual office had sufficient number of qualified bilingual employees assigned to positions and locations serving our limited-English proficient population. If an office has insufficient number of qualified bilingual employees, based on the Bilingual Authorization report, it is reported in our Civil Rights Summary of Findings Report. Offices are responsible for taking corrective action and reporting compliance 30 days after the Civil Rights Summary of Findings Report is completed.

Completed: October 28, 2013

#### **2. Lack of Translated Information on NOA's**

The third concern Ms. Lee shared was that inserts (handwritten information in a Notice of Action) in translated IHSS Notices of Action were written and sent out in English. Division 21 requires that translated forms and documents that have inserts must have inserts that are also translated into the preferred language. Division 21-115.2 states:

Forms and other written material required for the provision of aid or services shall be available and offered to the applicant/recipient in the individual's primary language when such forms and other written material are provided by CDSS. When such forms and other written material contain spaces (other than "for agency use only") in which the CWD is to insert information, this inserted information shall also be in the individual's primary language.

## **COMMUNITY/ADVOCATE INPUT (Cont'd)**

What Ms. Lee found was that the substantive portions that need to be filled out in the client's preferred language are instead written in English.

As noted in Section V, this reviewer did not see this problem in the sample reviewed. This sample included cases in English, Spanish, Farsi, and Armenian. In the Notices of Actions that were sent out to the client/recipient, all written information on the NOAs was properly translated into the client's preferred language.

**RECOMMENDATION:**

CDSS recommends that the Civil Rights Coordinator or his designate, and the IHSS program manager, meet with the Neighborhood Legal Services (NLS) advocate to confer on the aforementioned issues, verify the existence of the problem, identify the extent and nature of the problem, and develop any solutions that can resolve the issue.

**DPSS RESPONSE TO 2:**

The Civil Rights Coordinator meets quarterly with the Neighborhood Legal Services Advocates at the Community Advisory Board (CAB) meetings. IHSS Program Managers are invited to attend these meetings to discuss issues related to the IHSS Program. This issue has been brought up previously at the CAB meetings and the Legal Advocates agreed to provide examples so DPSS staff can further research and address the issue. This was not identified as an issue during the CDSS review or during the CRS internal reviews of DPSS' offices. However, this will be an agenda item at the next CAB meeting scheduled for February 20, 2014.

**Target Date:** March 31, 2014

**APRIL 2014 UPDATE:**

The Department's Civil Rights Coordinator and IHSS Program management met with NLS during the March Community Advisory Board meeting to discuss NLS' concern with translated IHSS Notice of Actions. The Department informed NLS that with the implementation of CMIPS II, all CDSS forms will be offered to applicants/participants in their primary language as they are made available by CDSS.

**Completed:** March 5, 2014