



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

July 9, 2013

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

Dear Mr. Dunn:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office, Ms. Tiffany Marsh during the course of the Civil Rights Compliance Review of May 20-23, 2013. 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 Ms. Tiffany at (916) 651-6242. You may also contact us by e-mail at [Tiffany.Marsh@dss.ca.gov](mailto:Tiffany.Marsh@dss.ca.gov).

Sincerely,

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

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

Enclosure

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

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

Jodie Berger, Regional Counsel  
Legal Services of Northern California

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR  
Sonoma County  
Human Services Agency**

**Conducted on  
May 20 – 23, 2013**

**California Department of Social Services  
Human Rights and Community Services Division  
Civil Rights Bureau  
744 P Street, M.S. 8-16-70  
Sacramento, CA 95814  
(916) 654-2107**

**Reviewer**

**Tiffany Marsh**

## **TABLE OF CONTENTS**

- I. INTRODUCTION**
- II. SUMMARY OF METHODOLOGY**
- III. DISSEMINATION OF INFORMATION**
- IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**
- V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**
- VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**
- VII. STAFF DEVELOPMENT AND TRAINING**
- VIII. DISCRIMINATION COMPLAINT PROCEDURES**
- IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL**
- X. CONCLUSION**

## 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 Sonoma County Human Services Agency 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 May 20 – 23, 2013. An exit interview was held to review the preliminary findings.

The review was conducted in the following locations:

<b>Name of Facility</b>	<b>Address</b>	<b>Programs</b>	<b>Non-English languages spoken by a substantial number of clients (5% or more)</b>
Apollo Building	1202 Apollo Way	CWS	Spanish
Challenger Building	2227 Capricorn Way	SonomaWORKs, PA CalFresh	Spanish
Paulin Building	2550 Paulin Drive	CalFresh, State Hearings	Spanish
Mendocino Building	520 Mendocino Ave.	CalFresh	Spanish

### **II. SUMMARY OF METHODOLOGY**

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

- Reviewed the 2013-14 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.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program 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

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

Interviews Conducted of Public Contact Staff

<b>Classifications</b>	<b>Total</b>	<b>Bilingual</b>
Eligibility Workers	6	3
Children Social Workers	4	2
Employment Services Workers	2	1
Receptionist/Screeners	3	3
<b>Total</b>	<b>15</b>	<b>9</b>

Program Manager Surveys

Number of surveys distributed	3
Number of surveys received	3

Reviewed Case Files

English speakers' case files reviewed	7
Non-English or limited-English speakers' case files reviewed	76
Languages of clients' cases	ASL, Chinese, Farsi, Siew, Spanish, Tigrinya, Vietnamese

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 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**

<b>Access to Services, Information and Outreach</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Clients can mail in applications. Staff will accommodate clients by scheduling a home visit appointment and/or conducting an over-the-phone interview.
Does the county have extended hours to accommodate clients?		X		Office hours are 8:00 am – 5:00 pm
Can applicants access services when they cannot go to the office?	X			Clients may access/apply for benefits at <a href="http://myBenefitsCalWIN.org">myBenefitsCalWIN.org</a> or call Service Center
Does the county ensure the awareness of available services for individuals in remote areas?	X			Community partners are provided updated information of services available to individuals

				in the remote areas.
--	--	--	--	----------------------

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county use the CDSS pamphlet “Your Rights Under California Welfare Programs” (Pub 13 – 6/11)?	X			Pub 13 (06/11) is provided at intake, re-certification and available in the lobbies.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			Pub 13 is explained to ensure clients are aware and understand his/her Rights and Responsibilities.
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, Ukrainian, 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			
Was the Pub 13 available in large print (English and Spanish), audio CD and Braille?	X			Available at the receptionist desk.
Were the current versions of the required posters present in the lobbies?	X			Pub 86 (03/07) AD 475B (12/99)
Did the workers know the location of the required posters with the Civil Rights Coordinator’s name and address?	X			
Were there instructional and	X			Each instructional and



<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?				directional signage posted in threshold language.

**B. Corrective Actions:** None

**C. Recommendation:** None

The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

Pub 13	“Your Rights under California Welfare Programs”	06/11
Pub 86	“Everyone is Different, but Equal Under the Law”	03/07
Form AD 475B	“And Justice for All”	12/99

Contact the Civil Rights Bureau to receive the most recent versions, or download the Pub 13 from the CRB website

<http://www.cdss.ca.gov/civilrights/entres/forms/English/pub13.pdf>.

#### **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:** 1202 Apollo Way  
No Findings

**2. Facility Location:** 2227 Capricorn Way

Facility Element	Findings	Corrective Action
Restroom	<p>Men: Door signage is too low at 59" center-line, wall signage is not displayed.</p> <p>Women: Wall signage is not displayed adjacent to the door latch.</p>	<p>Door sign and wall sign shall be 60" above the floor to the center-line of sign. (CA T24 1117B.5.7) (ADA 4.30.6) p 287</p> <p>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, preferable on the right. (CA T24 1117B.5.7)(ADA 4.30.6) p 287</p>

**a. Recommendation:** None

**3. Facility Location:** 2550 Paulin Drive

Facility Element	Findings	Corrective Action
Restroom	<p>Men: Wall signage is too high at 65"; door signage is too high at 64" at center-line.</p>	<p>Door sign and wall sign shall be 60" above the floor to the center-line of sign. (CA T24 1117B.5.7) (ADA</p>

	<p>Force to open door is excessive at 8 lbs.</p> <p>Women: Wall signage is too high at 65"; door signage is too high at 64" at center-line.</p> <p>Force to open door is excessive at 8 lbs.</p>	<p>4.30.6) 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>Door sign and wall sign shall be 60" above the floor to the center line of sign. (CA T24 1117B.5.7) (ADA 4.30.6) 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>
--	--	--

a. **Recommendation:** None

4. **Facility Location:** 520 Mendocino Avenue

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Exterior entrance	<p>Ramps are narrow at 44"-45" wide.</p> <p>Force to open exterior doors are excessive at 10 lbs. – 19 lbs.</p>	<p>The width of ramps is as required for stairways and exits. Pedestrian ramps have a minimum width of 48". (CA T24 1133B.5.2) p 147</p> <p>Exterior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(a)) p 207</p>
Lobby	No audible or visual	<p>If emergency warning systems are provide, 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</p>

		impaired. (CA T24 1114B.202, ADA 4.28.1) p. 242
Restroom	<p>Men: Wall signage not displayed adjacent to the door latch.</p> <p>Force to open door is excessive at 10 lbs.</p> <p>Pipe under sink is not securely insulated.</p> <p>Women: Wall signage not displayed adjacent to the door latch.</p>	<p>Door sign and wall sign shall be 60" above the floor to the center-line of sign.</p> <p>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, preferable on the right. (CA T24 1117B.5.7) (ADA 4.30.6) 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>Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.4.3.4) (ADA 4.19.4) p 296</p> <p>Door sign and wall sign shall be 60" above the floor to the center-line of sign.</p> <p>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, preferable on the right.</p>

	Force to open door is excessive at 10 lbs.	(CA T24 1117B.5.7) (ADA 4.30.6) p 287  Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207
--	--	--

a. **Recommendation:** None

**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**

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county identify a client's language need upon first contact? How?	X			Clients self-identify language on "I Speak" card or staff may contact the Interpreter Service Coordinator for assistance.
Does the county use a primary language form?	X			Form HSD 1259
Does the client self-declare on this form?	X			Client declares verbal and written communication.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			
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			Clients are assigned to a bilingual worker or provided interpretive services at point of each contact.
Is there a delay in providing services?		X		Appointments are scheduled to ensure interpretive services available at intake/re-certification. If a delay occurs, it would be due to a language uncommon to the county
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			Staff may access the interpretive services process on the County's intranet webpage.

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Are county interpreters determined to be competent?	X			County interpreters are tested and certified.
Does the county have adequate interpreter services?	X			Certified bilingual staff and contracted interpretive services
Does the county allow minors to be interpreters? If so, under what circumstances?		X		Unless, the safety of a child, elderly, or family's well-being may be jeopardized while waiting for interpreter.
Does the county allow the client to provide his or her own interpreter?	X			Staff explains the possibility of ineffective communication and confidentiality issues that may arise. Client and client-interpreter signs a Release of Information form.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			If staff feels client-interpreter does not understand or relay information correctly, a county provided interpreter will be requested to interpret.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			County will access CDSS website or contact the county department's Forms Desk for translated forms.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			If not available in client's primary language, staff will provide interpretive services to ensure client understands information provided.
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing,	X			County staff has access to TDDs, CA Relay Services, large print materials, and interpretive services.

Question	Yes	No	Some-times	Comments
speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?				
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			If determined to have disability, staff will assist clients by reading and explaining information to ensure understanding and assist with completing forms.
Does the county offer screening for learning disabilities?	X			
Is there an established process for offering screening?	X			
Is the client identified as having a learning disability referred for evaluation?	X			

**B. Corrective Actions:** None

**C. Recommendation:** None

**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**

<b>Documented Item</b>	<b>Children's Services</b>	<b>CalWORKs &amp; Employment Services</b>	<b>Non-Assistance CalFresh</b>	<b>Fraud Cases</b>
Ethnic origin documentation	Emergency Response Referral	CalWIN: Demographic Summary	CalWIN: Demographic Summary	Summary Sheet
Primary language documentation	Emergency Response Referral	CalWIN: Demographic Summary, Case Comments	CalWIN: Demographic Summary, Case Comments	Summary Sheet
Method of providing bilingual services and documentation	Case Narrative	Case Comments (Inconsistent documentation)	Case Comments (Inconsistent documentation)	Case Comments
Client provided own interpreter	Case Narrative	Case Comments	Case Comments	None Found in Case Sample
Method to inform client of potential problem using own interpreter	None Found in Case Sample	Case Comments	Case Comments	None Found in Case Sample
Release of information to Interpreter	None Found in Case Sample	Form CSF 14, Release of Information	Form CSF 14, Release of Information	None Found in Case Sample
Individual's acceptance or refusal of written material offered in primary language	Form HSD 1259	Form HSD 1259	Form HSD 1259	None Found in Case Sample
Documentation of minor used as interpreter	None Found in Case Sample	None Found in Case Sample	None Found in Case Sample	None Found in Case Sample

Documented Item	Children's Services	CalWORKs & Employment Services	Non-Assistance CalFresh	Fraud Cases
Documentation of circumstances for using minor interpreter temporarily	None Found in Case Sample	None Found in Case Sample	None Found in Case Sample	None Found in Case Sample
Translated notice of actions (NOA) contain translated inserts	None Found in Case Sample	CalWIN: Case Comments, Client Correspondence	CalWIN: Case Comments, Client Correspondence	None Found in Case Sample
Method of identifying client's disability	Case Narrative	Case Comments	Case Comments	None Found in Case Sample
Method of documenting a client's request for auxiliary aids and services	Case Narrative	Case Comments	Case Comments	None Found in Case Sample

## B. Corrective Actions

Areas of Action	Corrective Action
Documentation that bilingual services were provided	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
General	Sonoma County must ensure that proper documentation is kept in the file that identifies all the required <u>to ensure compliance</u> . <u>Div. 21-116</u>

## 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**

<b>Interview questions</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Do employees receive continued Division 21 Training?	X			County schedules annual trainings and issues monthly Civil Rights reminders as a means of ongoing training for staff.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			All staff interviewed had a clear understanding of policy and procedure for clients to file a complaint.
Does the county provide employees Cultural Awareness Training?	X			Included in the New Employee Orientation training.
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:** None

**C. Recommendation:** None

**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**

<b>Interview and review areas</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Findings</b>
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?			X	2 out of 15 staff interviewed could not clearly distinguish the difference between the three types of discrimination complaints.
Did the employees know who the Civil Rights Coordinator (CRC) 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 complete and up to date?	X			

**B. Corrective Action**

<b>Element</b>	<b>Corrective Action</b>
Discrimination Process	Sonoma County 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

**C. Recommendation:** None

**IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL**

The Sonoma County Human Services Agency Civil Rights Compliance Plan for the period May 1, 2013 through April 30, 2014 was received on March 29, 2013. It is approved as submitted.

## **X. CONCLUSION**

The CDSS reviewer found the Sonoma County Human Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Roy Redlich, Civil Rights Coordinator, for organizing the details of the review, and to Dale Wittman, Project 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 Sonoma County Human Services Agency 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 Sonoma County Human Services Agency 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.