

August 25, 2014

Philip L. Browning, Director
Los Angeles County Department
of Children and Family Services
425 Shatto Place, Room 600
Los Angeles, CA 90020

Dear Mr. Browning:

This letter is to advise you that the Corrective Action Plan submitted on February 18, 2014 and with an update on May 14, 2014 in response to the results of our September 2013 Civil Rights Compliance Review is approved.

If you have any further questions, please contact Mr. James Urquizo at (916) 654-2101 or by e-mail at James.Urquizo@dss.ca.gov.

Sincerely,

Original signed by Civil Rights Bureau Chief

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

c: Lynne Bowles Condon, Civil Rights Coordinator

bc: 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 Riesenbergs
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Jodie Berger, Regional Counsel
Legal Services of Northern California

**Preliminary Report of Corrective Action for the Civil Rights Compliance Report
September 16-19, 2013**

**Regulations cited are form the California Department of Social Services (CDSS)
Manual of Policies and Procedures (MPP) Division, Title 24, California Code of Regulations (T24 CCR)
And the Americans with Disabilities Act Accessibility Guidelines (ADAAG)**

SECTION IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

801 Corporate Center Drive, Pomona, CA Pomona Regional Office			
Facility Element	Findings	Corrective Action	Action Plan
<u>Parking</u>	Three Disabled Parking signs at a height lower than the required 80" (70.5", 65.2" and the third sign at 75.0)	When mounted on a post and in a path of travel, sign shall be posted at a minimum height of 80" min. from the bottom of the sign to the finish grade. (CA T24 1129B.4) (ADA 4.6.4)	3/31/14: Per CEO Ownership completed corrective action on 3/26/14. On 1/9/14 Property Management forwarded the Civil Rights Corrective Action to CEO RED for submission to Landlord for review and corrective action. Property Management requested from CEO-RED that Landlord correct the deficiencies by 2/24/14.
<u>Parking</u>	Disabled Client parking spots are located in an area where clients must travel across traffic from disabled parking spots to the sidewalk next to the building. No crosswalk with hash marks is available.	The parking access aisle shall be part of an accessible route of travel to the building or facility entrance. (CA T24 1129B.3.1)	3/31/14: Per CEO Ownership completed corrective action on 3/26/14. On 1/9/14 Property Management forwarded the Civil Rights Corrective Action to CEO RED for submission to Landlord for review and corrective action. Property Management requested from CEO-RED that Landlord correct the deficiencies by 2/24/14.

<p><u>Parking</u></p>	<p>One parking entry sign does not have specific agency to call to collect car if towed.</p> <p>(70.5", 65.2" and the third sign at 75.0)</p>	<p>An additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space.</p> <p>Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating:</p> <p>"Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issues for persons with disabilities may be towed at owner's expense."</p> <p>"Towed vehicles may be reclaimed at _____ or by telephoning _____."</p> <p>Blank spaces are to be filled in with appropriate information as a permanent part of the sign.</p> <p>(CA T24 1129B.4) p 134</p>	<p>3/31/14: Per CEO on 3/26/14, Ownership clarified that this entrance belongs to a different ownership and not part of building which is occupied by DCFS; no further action will be taken.</p> <p>On 1/9/14 Property Management forwarded the Civil Rights Corrective Action to CEO RED for submission to Landlord for review and corrective action. Property Management requested from CEO-RED that Landlord correct the deficiencies by 2/24/14.</p>
<p><u>Exterior Entrance</u></p>	<p>Front door pressures are excessive with one door at 12 lbs. and the other door at 8 lbs.</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum.</p> <p>(CA T24 1133B.2.5, ADA 4.13.11 (2) (a) & (b)) p 201.</p>	<p>3/31/14: Per CEO Ownership completed corrective action on 3/26/14.</p> <p>On 1/9/14 Property Management forwarded the Civil Rights Corrective Action to CEO RED for submission to Landlord for review and corrective action. Property Management requested from CEO-RED that Landlord correct the deficiencies by 2/24/14.</p>

<u>Outside Signage</u>	Directional Signs were no visible – guiding disabled clients to the front entrance	<p>Signs shall indicate the direction to accessible building entrances and facilities (CA T24 1117B.3) p. 191, 400</p> <p>Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2) (ADA 4.30.5) p 403</p>	<p>3/31/14: Per CEO Civil Rights Section on 2/7/14, the code does not require directional signage; no further action will be taken.</p> <p>On 1/9/14 Property Management forwarded the Civil Rights Corrective Action to CEO RED for submission to Landlord for review and corrective action. Property Management requested from CEO-RED that Landlord correct the deficiencies by 2/24/14.</p>
<u>Directional and Informational Signage Available in threshold languages?</u>	Front entry to the building does not have specified hours of operation for the LADCFS services.	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language.</p> <p>(Div 21-107.212)</p>	<p>3/31/14: Per CEO Civil Rights Section on 2/7/14, this is not a disability-related item; no further action will be taken.</p> <p>On 1/9/14 Property Management forwarded the Civil Rights Corrective Action to CEO RED for submission to Landlord for review and corrective action. Property Management requested from CEO-RED that Landlord correct the deficiencies by 2/24/14.</p>

<p align="center">20151 Nordhoff Street, Chatsworth, CA San Fernando Valley Regional Office</p>			
Facility Element	Findings	Corrective Action	Action Plan
<u>Parking</u>	Access pathway from the street needs repainting	The loading and unloading access aisle shall be marked by a border painted blue.	3/31/14: Per CEO Ownership completed corrective action on 3/26/14.

		<p>Within the blue border, hatched lined a maximum of 36" on center shall be painted a color contrasting with the parking surface preferably blue or white.</p> <p>(CA T24 1129B.3.1)</p>	<p>On 1/9/14 Property Management forwarded the Civil Rights Corrective Action to CEO RED for submission to Landlord for review and corrective action. Property Management requested from CEO-RED that Landlord correct the deficiencies by 2/24/14.</p>
<u>Parking</u>	Disabled access aisles lines and hash marks need to be repainted	<p>The loading and unloading access aisle shall be marked by a border painted blue.</p> <p>Within the blue border, hatched lined a maximum of 36" on center shall be painted a color contrasting with the parking surface preferably blue or white.</p> <p>(CA T24 1129B.3.1)</p>	<p>3/31/14: Per CEO Ownership completed corrective action on 3/26/14.</p> <p>On 1/9/14 Property Management forwarded the Civil Rights Corrective Action to CEO RED for submission to Landlord for review and corrective action. Property Management requested from CEO-RED that Landlord correct the deficiencies by 2/24/14.</p>
<u>Exterior Entrance</u>	Front lobby door pressure is excessive with one door at 8 lbs.	<p>Force to open doors, exterior and interior is 5 pounds maximum.</p> <p>(CA T24 1133B.2.5, ADA 4.13.11 (2) (a) & (b)) p 201</p>	<p>3/31/14: Per CEO Ownership completed corrective action on 3/26/14.</p> <p>On 1/9/14 Property Management forwarded the Civil Rights Corrective Action to CEO RED for submission to Landlord for review and corrective action. Property Management requested from CEO-RED that Landlord correct the deficiencies by 2/24/14.</p>

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

<u>Areas of Action</u>	<u>Findings</u>	<u>Corrective Action</u>	<u>Action Plan</u>
<u>Clients identified as having a learning disability being referred for evaluation</u>	No clear and concise program is visible that offers screening for a learning disability.	LADCFS needs to develop and implement a clear and decisive program to assist all clients with any possible learning disability needs, in accordance with Division 21 21-104 1 (2) (A) 2 and 21-115.	<p>LADCFS Procedural Guide 0600-505.12 delineates the requirements of Division 21 21-104 1 (2) (A) 2 and 21-115 Provision for Services to Applicants and Recipients Who Are Non-English-Speaking or Who Have Disabilities.</p> <p>When information is received that indicates that a child or another client has a disability (including learning disabilities), the Children's Social Worker (CSW) is responsible for gathering information and complete the Family Background (FB) forms including documentation of the client's (i.e. children, parents, caregivers) medical status, disability and needs for services. In addition, the CSW is to provide the necessary referrals that will meet the client's need and/or assist the client with effective communication and utilization of services and resources.</p> <p>Management will be instructed to review policy with staff with an additional focus on learning/cognitive disabilities.</p> <p>Memo will be sent by: 2/28/15.</p>

