



CDSS

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DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

February 23, 2012

Randolph F. Snowden, Director
Napa County Health & Human Services Agency
2261 Elm Street, Bldg P
Napa, CA 94559-3721

Dear Mr. Snowden:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of November 15-18, 2010. Enclosed is the final report on the review. We apologize for the delay.

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 sixty 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 attached 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.

If you need technical assistance in the development of your CAP, please feel free to contact the Civil Rights Bureau at (916) 654-2107. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

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

Enclosure

c: Ginger Fisher-Hubbard , Civil Rights Coordinator

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
Napa County Health & Human Services Agency
Conducted on November 15-18, 2010**

**California Department of Social Services
Human Rights and Community Services Division**

Civil Rights Bureau

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Reviewer

Elsa Garcia

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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 Napa County Health & 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 November 15-18, 2010. An exit interview was held on November 18, 2010, to review the preliminary findings.

The review was conducted in the following locations:

Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
900 Coombs St., Napa, CA	IHSS	Spanish
650 Imperial Way, Napa CA	CalWORKS	Spanish
2261 Elm Street, Napa, CA	CalFresh	Spanish

II. SUMMARY OF METHODOLOGY

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

- Reviewed the March 1, 2010 – Feb 28, 2011 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 was 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

Classifications	Total	Bilingual
Eligibility Workers	6	3
Adult Program Workers	4	2
Receptionist/Screeners	2	2
Total	12	7

Program Manager Surveys

Number of surveys distributed	3
Number of surveys received	3

Reviewed Case Files

English speakers' case files reviewed	4
Non-English or limited-English speakers' case files reviewed	75
Languages of clients' cases	Spanish, Tagalog, Arabic, French

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

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Clients can mail applications, apply online with C4Yourself.
Does the county have extended hours to accommodate clients?		X		Business hours are 8:00 a.m. - 5:00 p.m. However, special arrangements can be made if needed to accommodate clients.
Can applicants access services when they cannot go to the office?	X			Clients can access services online with C4Yourself, by telephone through an interactive voice response system and mail.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Information is available on the Napa County website through C4Yourself, Satellite

				Offices, and Community Outreach events. Other non-profit organizations help promote services, and through the 211 information and referral system.
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Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)?	X			
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			The pamphlet is included in every application packet and distributed at intake and recertification appointments.
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, Ukranian, 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), audiocassette and Braille?	X			
Were the current versions of the required posters present in the lobbies?	X			All office sites visited had current required posters.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			Staff interviewed was aware of the location of the required posters.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			All office sites visited had Spanish translated instructional and directional signage in waiting areas.

C. Recommendation

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.dss.cahwnet.gov/civilrights/YourRights_498.htm.

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

Facility Location: 900 Coombs Street, Napa, CA

Facility Element	Findings	Corrective Action
Men's Restroom	Force to open door is excessive at 16 lbs. Door signage is too high above 60 inches.	Exterior and Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201 Door sign and wall sign shall be 60" above the floor to the center line of sign.
Women's Restroom	Force to open door is excessive at 13 lbs. Door signage is too high above 60 inches.	Exterior and Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201 Door sign and wall sign shall be 60" above the floor to the center line of sign.

B. Facility Location: 650 Imperial, Napa, CA

Facility Element	Findings	Corrective Action
<p>Parking</p>	<p>There is no "Unauthorized Parking" signage at entrance to off street.</p> <p>Each accessible parking space must be identified with proper accessible International Symbol of Accessibility (ISA) signage. There is an accessible parking space near the rear entrance that does not have proper ISA signage.</p> <p>Accessible spaces do not have the "Minimum Fine \$250" signage below the ISA sign.</p>	<p>Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p 133</p> <p>Each parking space for persons with disabilities shall be identified by a reflectorized sign permanently posted adjacent to and visible from each stall or space, consisting of the International Symbol of Accessibility in white on dark blue background.</p> <p>The sign shall be 70 sq. in. min. and, when in a path of travel, shall be posted at a height of 80" min. from the bottom of the sign to the finished grade. (CA T24 1129B.) (ADA4.6.4) p133</p> <p>For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the</p>

	<p>Accessible space near front entrance is too short at 17 feet. Rear accessible space is too narrow at 8 feet wide.</p> <p>(Repeat finding from 2007) Van-accessible space is too short at 17'.</p> <p>Access aisle is too narrow at 6 feet.</p> <p>Ramp is too steep and uneven at 10%.</p>	<p>symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133</p> <p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p 135</p> <p>Access aisles should be located on the passenger side of a space, and should be a min. of 18' long by 5" wide for aisles, serving car accessible spaces, and a min. 18' by 8' wide for aisles serving van accessible spaces. (CA T24 1129B.3.1) (ADA 4.6.3)</p> <p>Slope of ramp does not exceed 1:12 (8.3% slope). (CA T24 1127B.5.3, ADA 4.8.2) p 155</p>
Entrance(s)	No ISA signage on main entrance and rear entrance.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.1) pp 186, 394
Client lobby	Pub 13 was not available in large print or Braille at reception desk.	Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD's

		applicant/recipient population including alternate formats (e.g., cassette tapes, large print, etc.). Div 21.107 .221
Men's Restroom	Wall accessible signage was not located adjacent to latch outside of door. Force to open door is excessive at 15 lbs.	Door sign and wall sign shall be 60" above the floor to the center line of sign. 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, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 281 Interior and Exterior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201

C. Facility Location: 2261 Elm Street, Napa, CA

Facility Element	Findings	Corrective Action
Parking	There is no "Unauthorized Parking" signage at entrance to off street.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed

	<p>Accessible spaces do not have the "Minimum Fine \$250" signage below the ISA sign.</p> <p>Ramp slope to main entrance was too steep at 10.3%.</p>	<p>vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p 133</p> <p>For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133</p> <p>Slope of ramp does not exceed 1:12 (8.3% slope). (CA T24 1127B.5.3, ADA 4.8.2) p 155</p>
Main Entrance	No ISA signage on main entrance.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.1) pp 186, 394
Client Interview Rooms	The smaller client interview rooms do not have the adequate turn around space.	Wheelchair Turning Space is a minimum space for a wheelchair to turn 180 degrees in a 60" diameter or T-shaped space. (CA T24 1118B.3, ADA 4.2.3) p 236
Drinking Fountain	Fountain does not have minimum knee space of 27" from floor.	The clear knee space between the bottom of the apron and the floor or ground is not less than 27" in height, 30" in width, and 8" in depth. (CA T24 1117B.1.2, ADA 4.15.5(1)) p 231
Men's Restroom	Urinal is too high at 19".	Rim height shall be a maximum of 17" in height above the floor. (CA T24 1115B.4.2.1) p 285
		Urinals: Where there are

	<p>Toilet seat protectors are too high at 43".</p> <p>Waste receptacle is too high at 42"</p>	<p>urinals provided, at least one (1) shall provide a clear floor space of 30" wide x 48" deep in front of the urinal to allow for a forward approach. This clear space may extend 6" maximum under the urinal if the urinal has a 9" minimum toe clearance from the floor to the urinal's bottom. (CA T24 1115B.4.2.3, ADA 4.18.3 & 4.22.5) p 285</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p 294</p>
Women's Restroom	<p>Toilet sheet protectors are too high at 43".</p> <p>Waste receptacle is too high at 42".</p>	<p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p 294</p>

D. Recommendation

A larger interview room was available, designating this room as accessible with the ISA signage would meet the requirements, and the needs of clients who are in a wheelchair or have a need for accessibility.

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

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			Clients identify their primary language on SAWS1 application form at first point of contact.
Does the county use a primary language form?		X		
Does the client self-declare on this form?		X		Clients self declare on SAWS1 application form.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Clients are assigned a bilingual worker, or an interpreter would be requested through the AT&T Language Line.
After it has been determined that the client is limited-English or non-English speaking, is there				See above response.

Question	Yes	No	Some-times	Comments
a county process for procuring an interpreter?	X			
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			Napa County utilizes a bilingual staff roster, and/or over the phone interpretation services provided by AT&T Language Line Services.
Are county interpreters determined to be competent?	X			Merit System Services (MSS) administers a bilingual exam.
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?		X		
Does the county allow the client to provide his or her own interpreter?	X			It is county policy if a client chooses to use their own interpreter, staff must make the person aware that he/she has the option of having a certified interpreter without charge and then obtain a release of information and address the issue of confidentiality.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			
Does the county use the CDSS-translated forms in				

Question	Yes	No	Some-times	Comments
the clients' primary languages?	X			
Is the information that is to be inserted into NOA translated into the client's primary language?		X		Napa CWD does not insert translated paragraphs into NOA's or forms; rather they translate the entire form.
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			Staff interviewed state they would assist clients by reading material to them to ensure they understand.
Does the county offer screening for learning disabilities?	X			Participants of Employment Services Programs (CalWORKS & WTW).
Is there an established process for offering screening?	X			Employment Social Workers ask during initial screening.
Is the client identified as having a learning disability referred for evaluation?	X			If client is identified of having a learning disability they would be referred to the local college for further evaluation and services.

Z

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

Documented Item	Adult Programs (IHSS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	SOC 295	C-IV SAWS1	C-IV SAWS1
Primary language documentation	SOC 295	C-IV SAWS1	C-IV SAWS1
Method of providing bilingual services and documentation	Interpretive Services Disclosure Form	C-IV Journal	C-IV Journal
Client provided own interpreter	IHSS narrative	C-IV Journal case notes	None found in case sample
Method to inform client of potential problem using own interpreter	Interpretive Services Disclosure Form	None found in case sample	None found in case sample
Release of information to Interpreter	Interpretive Services Disclosure Form	None found in case sample	None found in case sample
Individual's acceptance or refusal of written material offered in primary language	C-IV	C-IV	C-IV

Documented Item	Adult Programs (IHSS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Documentation of minor used as interpreter	None found in case sample	None found in case sample	None found in case sample
Documentation of circumstances for using minor interpreter temporarily	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	None found	None found
Method of identifying client's disability	Case Narrative	None found, would be in C-IV Medical Conditions	None found, would be in C-IV Medical Conditions
Method of documenting a client's request for auxiliary aids and services	Case Narrative	None found in case sample	None found in case sample

II. 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

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			All staff interviewed stated they receive training on ongoing basis.

Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			All staff interviewed were understood the county policy.
Does the county provide employees Cultural Awareness Training?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			All staff was aware of the predominant cultural groups in their area.

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

Interview and review areas	Yes	No	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X		All staff were able to differentiate between the different complaints.
Did the employees know who the Civil Rights Coordinator is?	X		All staff knew who the Civil Rights Coordinator is.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X		All staff interviewed knew the location of the Civil Rights poster, and the procedure for clients to file a discrimination complaint.

Interview and review areas	Yes	No	Findings
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X		

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Napa County Health & Human Services Agency Civil Rights Compliance Plan for the period March 1, 2010 through February 28, 2011, was received on December 31, 2009. It is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the Napa County Health & Human Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Mitch Wippurn, Civil Rights Coordinator, for organizing the details of the review, and 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 Napa County Health & 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 Napa County Health & 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.