



CDSS

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DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

September 20, 2011

Philip L. Browning, Director
Los Angeles County
Department of Public Social Services
12860 Crossroads Parkway South
Los Angeles, CA 91746-3411

Dear Mr. Browning:

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 May 23-27, 2011. 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. Per the Governor's Executive Order S-08-09, all compliance reviews (and corresponding CAPs) performed after January 1, 2008, will be posted on the state's Reporting Government Transparency website.

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: Gloria Easley, Civil Rights Coordinator

Linda Patterson, Branch Chief
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
LOS ANGELES COUNTY
DEPARTMENT OF PUBLIC SOCIAL SERVICES**

Conducted on May 23-27, 2011

**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 Los Angeles County Department of Public Social Services 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 23-27, 2011. An exit interview was held to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
#19 Pomona Office	360 E. Mission Blvd Pomona , CA	IHSS	Spanish Chinese (Mandarin & Cantonese) Tagalog
#12 Exposition Park Office	3833 S. Vermont Ave, 2 nd Floor, Los Angeles	CalFresh & CalWORKS	Spanish
#27 South Central Office	10728 S. Central Ave Los Angeles	CalFresh & CalWORKS	Spanish
#10 Wilshire Office	2415 W. 6 th Street, Los Angeles	CalFresh	Spanish Armenian Korean

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2010-2011 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	12	9
Adult Program Workers	3	3
Receptionist/Screeners	4	4
Total	19	16

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	5
Non-English or limited-English speakers' case files reviewed	97
Languages of clients' cases	Spanish, Tagalog, Mandarin, Korean, Armenian

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 in applications.
Does the county have extended hours to accommodate clients?		X		Home calls can be made available upon request.

Can applicants access services when they cannot go to the office?	X			Clients can access services by mail, internet (Your Benefits), IVR, DPSS website, Customer Service Toll Free Line.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Awareness is made through outreach events, community agencies, food banks, Radio announcements and CDSS website.

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 all packets.
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), audiocassette and Braille?	X			
Were the current versions of the required posters present in the lobbies?	X			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
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			

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
Note: This is a new version of the PUB 13. Other languages will follow on a flow basis.		
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: 360 E. Mission Blvd., Pomona

Facility Element	Findings	Corrective Action
Parking	<p>No "Minimum Fine \$250" signage below the ISA sign.</p> <p>Lengths of accessible spaces are too short at 16'7".</p> <p>Access aisle is short in length at 4'9".</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>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>
Men's Restroom	Force to open door is excessive at 10 lbs.	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
Women's Restroom	Force to open door is excessive at 10 lbs.	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

B. Facility Location: 3833 S. Vermont Ave, Los Angeles

Facility Element	Findings	Corrective Action
<p>Parking</p>	<p>No "Minimum Fine \$250" signage below the ISA sign for each parking space in Parking Garage.</p> <p>Total of twelve accessible spaces, six on the left side by the elevator and six opposite of the elevator. The six on the left side of the elevator meet the accessible parking space measurements (18 x 9).</p> <p>The six access aisle spaces on the left side of the elevator do not meet the access aisle measurement requirement at 4'9.</p> <p>There are six spaces opposite of the elevator. Only one of the spaces located as the fourth space from left to right meets Length meas. of 18'. The spaces varied in lengths:</p> <p>#1 16'6 ½ L, #2 16'6 L #3 16'7 L #4 18 L #5 17'10 ½ #6 16' 4 ½</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>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>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>Exterior entrance into lobby from parking garage.</p>	<p>Force to open door is excessive at 20 lbs.</p> <p>No directional signage to accessible main entrance lobby.</p>	<p>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</p> <p>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</p>
<p>Front Main Entrance</p>	<p>The ramp slope is too steep. It varied in measurements from 8.4% to 9.5%.</p> <p>The width of ramp is too narrow at 46".</p> <p>Force to open main entrance door is excessive at 15 lbs.</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> <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 144</p> <p>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</p>
<p>1st Floor, Men's Restroom</p>	<p>Force to open door is excessive at 18 lbs.</p>	<p>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</p>
<p>1st Floor Women's Restroom</p>	<p>Force to open door is excessive at 20 lbs.</p>	<p>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</p>

C. Facility Location: 10728 S. Central Ave, Los Angeles

Facility Element	Findings	Corrective Action
Exterior entrance	<p>There is a ramp leading to the building, and the second section of the ramp does not meet the measurement requirements; (slope varies between 8.4% - 9.6%).</p> <p>Ramp does not have railings on both sides. It is longer than 6'.</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> <p>If a ramp run has a rise greater than 6" or a horizontal project greater than 6', then it shall have handrails on both sides. (CA T24 1133B.5.5.1, ADA 4.8.5(1) p 146)</p>
Public Telephone	<p>The public telephone does not have volume control and hearing aid capability.</p>	<p>At least one in each telephone bank and a minimum of 25% of the total number of public telephones shall be equipped with a volume control and shall be hearing aid compatible. (CA T24 1117B.2.8, ADA 4.1.3.17(b)) p 273</p>
Men's Restroom	<p>Force to open door is excessive at 10 lbs.</p>	<p>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</p>
Women's Restroom	<p>Pipes under sink are not securely insulated.</p> <p>Paper towel dispenser is too high at 50"</p>	<p>Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.4.7.1, ADA 4.24.6) p 343</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</p>

		coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p 294
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D. Facility Location: 2415 W. 6th Street, Los Angeles

Facility Element	Findings	Corrective Action
Exterior entrance	In front of main entrance, the sidewalk is obstructed with uneven walkway.	Walks and sidewalks subject to these regulations shall have a continuous surface, not interrupted by steps or by abrupt changes in level exceeding ½ inch and shall be a minimum of 48" in width. Surfaces shall be slip resistant. (CA T24 1133B.7.1, ADA 4.3.8) p 163

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			PA 481 is included in intake packets.
Does the county use a primary language form?	X			PA481 LANGUAGE DESIGNATION FORM
Does the client self-declare on this form?	X			
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 and/or an interpreter is requested for languages not available through LADPSS staff.
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			Open Communication International, Bilingual Resource Utilization and Los Angeles over-the- phone language services.
Are county interpreters determined to be competent?	X			
Does the county have adequate interpreter services?	X			

Question	Yes	No	Some-times	Comments
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			If client prefers to use their own interpreter they may do so, but they must sign PA481A.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			It is explained to the client about the possibility of ineffective communication.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			
Is the information that is to be inserted into NOA translated into the client's primary language?	X			
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			When client registers with front desk and has indicated a need for assistance, the client is immediately assisted

Question	Yes	No	Some-times	Comments
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			

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 & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	SOC 293	Saws1, Leader case notes	SAWS1, DFA 285
Primary language documentation	PA 481	PA 481	PA 481
Method of providing bilingual services and documentation	PA 481 Pa 1955	PA 481	PA 481
Client provided own interpreter	PA 481A	PA 481A	PA 481A

Documented Item	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Method to inform client of potential problem using own interpreter	PA 481A	PA 481A	PA 481A
Release of information to Interpreter	PA 481A	PA 481A	PA 481A
Individual's acceptance or refusal of written material offered in primary language	PA 481A	PA 481A	PA 481A
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	N/A	N/A	N/A
Translated notice of actions (NOA) contain translated inserts	CMIPS	LEADER	LEADER
Method of identifying client's disability	CIMPS, Green coded label, PA 1955, IHSS Needs Assessment Form, PA 1983	SOF	SOF

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

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			Staff interviewed stated they receive training on an ongoing basis.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
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			Staff is knowledgeable about the predominant cultural groups in their service 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	Some-times	Findings
Can the employees easily identify the difference between a program,		X		Two of the staff interviewed could not differentiate between the different

Interview and review areas	Yes	No	Some-times	Findings
discrimination, and a personnel complaint?				complaints.
Did the employees know who the Civil Rights Coordinator is?	X			
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?		X		Two of the staff members interviewed did not know the location of required poster.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Corrective Action

Element	Corrective Action
Discrimination Process	LASPSS 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
Civil Rights Coordinator	LADPSS shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Div. 21-117 and 21-107.21

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The LADPSS County Department of Social Services Civil Rights Compliance Plan for the Fiscal Year period 2010 through 2011 was received on March 2011. It is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the LADPSS staff warm, welcoming, informative and very supportive. Particular thanks to Gloria Easley, Civil Rights Coordinator, for organizing the details of the review and to Monica Schmidt 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 LADPSS in significant 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 LADPSS 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.