



**BRANDEN BUTLER**  
DIRECTOR

**OFFICE OF ETHICS, COMPLIANCE AND LABOR STANDARDS**  
1600 PACIFIC HIGHWAY, ROOM 452, MAIL STOP A-6  
SAN DIEGO, CA 92101  
(619) 531-5174

July 1, 2024

TO: Supervisor Nora Vargas, Chair  
Supervisor Terra Lawson-Remer, Vice Chair  
Supervisor Joel Anderson  
Supervisor Monica Montgomery Steppe  
Supervisor Jim Desmond

FROM: Branden Butler, Director, Office of Ethics, Compliance and Labor Standards

### **ACCESSIBILITY ENHANCEMENTS FISCAL YEAR 23-24 ANNUAL REPORT**

On January 25, 2022 (20), the San Diego County Board of Supervisors (Board) directed the Chief Administrative Officer (CAO) to provide an annual report to the Board that outlines any enhancements to accessibility provided under the various County departments during the year. Attachment A to this memo is the report on accessibility enhancements.

#### **Background**

The County of San Diego (County) provides access for people with disabilities to County facilities, services, programs, and activities in accordance with the Americans with Disabilities Act (ADA).

Key types of accessibility include:

- Physical Accessibility
- Program Accessibility
- Effective Communication

Physical enhancements include new construction per California building code, facility improvements, and parking lot and pedestrian rights of way renovations. Program enhancements include program modifications to provide access to people with disabilities, and programs implemented to serve people with disabilities like programs offered through Behavioral Health Services and Aging & Independence Services. Effective communication enhancements include language and ASL interpretation, document translations, and website updates.

The County ensures ADA compliance through a variety of means including risk assessment, policies and procedures, training and communication, confidential reporting structure, and investigation processes. Resources to ensure accessibility at the County of San Diego include the County ADA

Title II Coordinator, the Accessibility Awareness Working Group, Departmental ADA Coordinators, the Compliance Awareness program, and the Board of Supervisors-appointed community advisory group, the Committee for Persons with Disabilities.

### **Policies and Procedures**

The Board has policies for guidance with respect to accessibility.

- F-49 - Americans with Disabilities Act: Accessible Programs and Facilities Board Policy
- A-125 - Americans with Disabilities Act: Employment Provisions Board Policy

The Chief Administrative Officer Admin Manual includes policy 0010-09 Americans with Disabilities Act, Title II, Procedures and Filing of Complaints for conformance to the Americans with Disabilities Act. This policy was updated this fiscal year to clarify and streamline the procedure while adding statements about:

- Receiving and processing reasonable modifications in policies, practices, and procedures to avoid unnecessary exclusion of individuals with disabilities.
- Allowing service animals to accompany people with disabilities in all areas of the facility where the public has access.
- Ensuring web accessibility for persons with disabilities by complying with Section 508 of the Rehabilitation Act of 1973.
- Allowing a person with a disability who uses a wheelchair or other manually powered mobility aid into all areas where the public has access.
- Facilitating an appeal process if the response by the County ADA Title II Coordinator does not satisfactorily resolve the issue.

The revisions to Item No. 0010-009 were conducted by the Office of Ethics, Compliance, and Labor Standards, Department of General Services, and County Counsel. Reviews were provided to members of the Accessibility Awareness Working Group representing departments across the enterprise in all four management groups.

### **County ADA Title II Coordinator & Departmental ADA Coordinators**

The County ADA Title II Coordinator operates in the Office of Ethics, Compliance, and Labor Standards. The coordinator works across the County to maintain appropriate governance, policies, training, communication, compliance monitoring, and complaint management and issue resolution in order to ensure compliance with the ADA. The County ADA Title II Coordinator participates in the California Network of ADA Coordinators that is facilitated through the Pacific Region ADA Center.

The Office of Ethics and Compliance worked together with the DiverseAbility Employee Resource Group (ERG) to deliver the Know the Code enterprise-wide compliance employee awareness program topic for National Disability Employment Awareness Month in October 2023.

In addition to the County ADA Title II Coordinator, most departments have appointed at least one employee to serve as a Departmental ADA Coordinator to receive and address any ADA and accessibility issues in the department. In FY 2023-24, the County ADA Title II Coordinator shared resources with Departmental ADA Coordinators on topics to include:

Accessibility Enhancements Fiscal Year 23-24 Annual Report

- Access & Functional Needs (AFN) for emergency management
- Emotional Support & Service Animals
- ADA Coordinator Training

The Department ADA Title II Coordinator Resource Toolkit was updated with contact information and additional resources.

**Accessibility Awareness Working Group**

The Accessibility Awareness Working Group was convened as an advisory group of County leaders to address the January 25, 2022 (10) Board direction. The Accessibility Awareness Working Group consists of a core group of departmental County leaders that provides input on the activities in response to the accessibility awareness. Representatives are involved in community engagement as well as identifying and implementing opportunities to increase accessibility awareness and to develop, implement, and log accessibility enhancements.

In FY 2023-24, the County ADA Title II Coordinator shared resources with the Accessibility Awareness Working Group on topics to include:

- Access & Functional Needs (AFN) for emergency management
- Emotional Support & Service Animals
- ADA Coordinator Training
- Certified Access Specialist (CASP) Training
- DOJ Web and Mobile Accessibility
- Disability Pride Month Proclamation 2023

The County ADA Title II Coordinator worked with the Department of Public Works to submit an update to the Caltrans Division of Local Assistance ADA Section 504 Compliance Review Assessment in February 2024.

**Committee for Persons with Disabilities**

Article III of the Code of Administrative Ordinances states that the Committee for Persons with Disabilities (CPD), a Board of Supervisors-appointed community advisory group, exists to assure the self-determination of persons with disabilities; provide persons with disabilities with the resources and educational services necessary to enable them to achieve their fullest potential; and to provide them with an equal opportunity to participate fully in the social and economic benefits of our society. The CPD continued its focus areas on public safety, housing, and program access.

In 2023-24, the CPD was promoted by exhibiting at the Live Well San Diego 5K Expo, and the Ethics Awareness Fair. CPD members attended the Live Well Advance and School Summit in November 2023. The CPD is considering exhibiting at the Live Well Advance and School Summit in November 2024.

Departments continue to be encouraged to provide presentations on their programs to the committee. The CPD received presentations and provided input to various programs in the departments below:

- County Communications – Housing Blueprint
- Planning & Development Services - Housing

Accessibility Enhancements Fiscal Year 23-24 Annual Report

- HHSA In-Home Supportive Services – Client Services
- HHSA Live Well San Diego Support Team
- Office of Emergency Services
- County Counsel – Teleconference Meetings
- Sheriff
  - Service Animal Signage at CAC
  - Blue Envelope Program
  - ADA Unit Overview

In fiscal year 2023-24, the CPD elected a new chair and a re-elected the vice-chair. With the termination of the Emergency due to COVID-19, the Committee experienced several seats becoming vacant due to the inability to attend in-person meetings as required by the Brown Act. The committee is currently comprised of four appointed seats and one expired but occupied seat in District 4 due to terminations and resignations. Six vacancies currently exist (two in District 1, and one in each of Districts 2, 3, 4, and 5).

### **Jay's Program**

With a goal to increasing access to employment opportunities for people with disabilities, Human Resources sponsors Jay's Program with departments across the County enterprise. Jay's Program is a 6-month, part-time, paid internship opportunity with the County available to candidates served by the San Diego Regional Center and PRIDE Industries. The program exists to help those with intellectual and developmental disabilities improve their job skills and increase opportunities for future employment.

The departments below participated in Jay's Program in FY23-24 (Cohorts 5-8).

- Agriculture, Weights, and Measures
- Clerk of the Board of Supervisors
- County Counsel
- County Technology Office
- Environmental Health and Quality
- FGG Executive Office
- HHSA - Financial & Support Services Division
- HHSA - Homeless Solutions & Equitable Communities
- HHSA - Medical Care Services (MCS)
- HHSA - Public Health Services - California Children Services (CCS)
- Human Resources
- Office of Equity and Racial Justice
- Parks and Recreation
- Planning & Development Services
- Public Works

Twelve interns have graduated this fiscal year. Out of the twenty program graduates nine have obtained County employment.

### **Departmental Accessibility Enhancements**

As directed by the Board, an annual report listing accessibility enhancements is to be provided at the end of each fiscal year. This second annual report updates last year's report on enhancements to facilities, services, programs, activities, and accommodations that are in place to provide access to people with disabilities. During fiscal year 2023-24, thirty-two (32) departments, up from twenty-nine (29), in each of the four management groups provided input on over 200 (up from just under 200) initiatives and program enhancements that increase accessibility to County of San Diego facilities, services, programs, and activities.

The report on accessibility enhancements is referenced in this board memo in Attachment A.

If you have questions, please contact Todd Hood, Chief Privacy Officer and County ADA Title II Coordinator at [todd.hood@sdcounty.ca.gov](mailto:todd.hood@sdcounty.ca.gov) or Branden Butler, Director Office of Ethics, Compliance, and Labor Standards Enforcement at [branden.butler@sdcounty.ca.gov](mailto:branden.butler@sdcounty.ca.gov)

Respectfully,



Branden Butler  
Director, Office of Ethics, Compliance, and Labor  
Standards

### ATTACHMENT(S)

ATTACHMENT A – County of San Diego – Annual Report of Accessibility Enhancements (Fiscal Year 23-24)

- c: Ebony Shelton, Chief Administrative Officer
- Michael Vu, Assistant Chief Administrative Officer
- Claudia Silva, County Counsel
- Joan Bracci, Interim Deputy Chief Administrative Officer/Chief Financial Officer
- Amy Harbert, Interim Deputy Chief Administrative Officer, Land Use and Environment Group
- Andrew Strong, Interim Deputy Chief Administrative Officer, Public Safety Group
- Caroline Smith, Interim Deputy Chief Administrative Officer, Health and Human Services Agency
- Kelly Martinez, San Diego County Sheriff