# Sacramento County Disability Advisory Commission (DAC)

Date:[Final Draft for Approval at June 3, 2025 DAC meeting]

To: David Villanueva, County Executive

Subject: **Position Paper on Strengthening the County’s Disability Compliance Office**

Dear Mr. Villanueva,

The Disability Advisory Commission (DAC) respectfully submits the attached position paper, **Strengthening Sacramento County’s Disability Compliance Office**, for your review and consideration.

Sacramento County’s greatest strength lies in its diversity — in the unique contributions of its residents and the dynamic interplay between the many departments that serve them. As the County continues to grow and evolve, ensuring accessibility for all community members is not just a legal obligation, but an opportunity to lead with inclusion, resilience, and excellence.

This position paper outlines six strategic recommendations to strengthen the County’s Disability Compliance Office (DCO). These recommendations are grounded in best practices from leading jurisdictions, federal and state legal requirements, and a systems-thinking approach to building long-term adaptability. Our vision is for a County where accessibility is embedded across every department, where prevention replaces reaction, and where every resident’s dignity is honored by design.

We look forward to supporting the County’s leadership in advancing these goals and welcome the opportunity to collaborate in building a Sacramento County where everyone belongs.

With respect and partnership,



Eugene Lozano, Jr.
Chair, Sacramento County Disability Advisory Commission

C: Deputy County Executives Sylvester Fadal, Administrative Services; Chevon Kothari, Social Services; David Defanti, Community Services; Eric Jones, Public Safety and Justice

Board of Supervisors’ Chiefs of Staff Alma Munoz, District 1; Keaton Riley, District 2; Vanessa McCarthy-Olmstead, District 3; Matt Hedges, District 4; Rebecca Thornton-Sloan, District 5

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# Position Paper: Strengthening Sacramento County’s Disability Compliance Office

## Preface: Process and Purpose

This Position Paper was developed in response to the organizational study of the Disability Compliance Office conducted by CPS-HR on behalf of the Department of Personnel Services. Following the study’s presentation to the DAC on April 1, 2025, a task force was formed to formulate recommendations aligned with the study’s findings. The DAC formally approved this Position Paper on [insert date], with the intent to provide clear, collaborative recommendations to the County Executive’s Office, Department of Personnel Services, and Board of Supervisors.

## Executive Summary

Sacramento County’s strength lies in its diversity and the ways individual contributions connect to create a thriving whole. However, the County’s Disability Compliance Office (DCO) structure must evolve to fully reflect these principles. This position paper outlines the Disability Advisory Commission’s (DAC) recommendations to establish a resilient, proactive DCO, led by a Chief of ADA Compliance and supported by a dedicated team. These recommendations are grounded in best practices, systems thinking, and a commitment to building a County where access and belonging are woven into every service and department.

Our recommendations are designed to move the DCO beyond reactive compliance toward a model that is proactive, coordinated, and built for long-term success. Through structural realignment, strategic staffing, and visionary planning, Sacramento County can lead by example—becoming a model of adaptive, inclusive governance.

## Introduction

Every community, every organization—even society itself—thrives not through sameness, but through the dynamic interplay of diverse roles, perspectives, and skills. Complex systems flourish when their parts connect, adapt, and support one another. Our County is no exception: its greatest strength comes from honoring what each person brings and building structures where no one is expected to do everything alone.

The recent program review and desk audit of the DCO recognized that growth is needed in this office, including the reclassification of the Personnel Technician position. Without appropriate structural changes and staffing investments, the reach and resilience of the DCO will continue to be limited. This is not a shortcoming of any individual, but a sign that the County, like all healthy systems, must adapt its structure to match its goals.

## Background: Chief, Disability Compliance Program

In 1992, Sacramento County formally elevated the existing full-time ADA coordinator position to full-time Chief, Disability Compliance Program to ensure a centralized, high-level approach to ADA compliance and accessibility across all County operations. This position operated successfully for over two decades until the incumbent retired in 2014. Since then, leadership for the County’s ADA and accessibility efforts has been fragmented and under- resourced under the leadership of a part-time ADA coordinator. Reinstating a Chief-level ADA Compliance Officer is not a new proposal—it is a return to a proven model of governance and an opportunity to align with modern best practices.

## The Case for Change

ADA and Title II compliance (42 U.S.C. § 12131–12165) affect every facet of County operations—from elections to emergency management, from parks to public health. When accessibility is treated as the responsibility of a single department, systemic gaps inevitably emerge, exposing the County to legal, operational, and reputational risks.

Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. § 12131–12165), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794), and California Government Code § 11135 require that all programs, services, and activities be accessible to individuals with disabilities. The U.S. Department of Justice’s ADA Title II Technical Assistance Manual strongly recommends the designation of an ADA Coordinator with sufficient authority and visibility.

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“Public entities should designate at least one responsible employee to coordinate their efforts to comply with and carry out their responsibilities under Title II, and that official must be given sufficient authority, funding, and staff to carry out these duties effectively.” (U.S. DOJ, ADA Title II Technical Assistance Manual, II-8.3000)*

**Sacramento County is home to over 260,000 residents with disabilities**, representing approximately 19% of the total population (U.S. Census Bureau, 2022 American Community Survey). This includes individuals with physical, sensory, cognitive, and mental health conditions—many of whom regularly interact with County services. When systems lack proactive design, these residents face disproportionate barriers—missed services, inaccessible communications, physical inaccessibility, and procedural confusion. This is not a side issue. It is central to the County’s effectiveness and trust.

Sacramento County must treat accessibility as a cross-departmental, executive-level priority. Embedding the DCO within the County Executive Office establishes unified standards, strengthens accountability, and empowers every department to meet its responsibilities with consistency and confidence. This structure not only safeguards the County against risk; it fosters a culture of excellence and inclusion, strengthens community trust, and positions Sacramento County as a leader in modern, equitable governance.

## A Vision for What’s Possible

We envision a DCO that models the best of systems thinking:

* **Empowered at the executive level** — DCO ADA Coordinator directly reporting to the County Executive, with authority across departments.
* **Staffed as a team** — with a full-time ADA Chief, full-time Senior Personnel Analyst or equivalent, and full-time Personnel Analyst, ensuring both expertise and continuity.
* **Guided by a five-year vision/action plan** — so the office, and the County, can adapt, grow, and serve into the future.
* **Connected to community feedback and cross-departmental learning** — valuing diverse perspectives and ongoing improvement.
* **Modeled after the most adaptive jurisdictions** — such as San Francisco’s Office on Disability and Accessibility and Los Angeles’ ADA Compliance Office.

### Equity and Belonging

Belonging is not created through accommodation alone—it is built through design. When systems recognize difference as strength, they don’t simply make space for people with disabilities; they become whole.

Accessibility is not about fixing people to fit systems. It’s about shaping systems that reflect the full range of human experience. That is the work of equity—not just compliance with the law, but the creation of cultures, structures, and services where everyone can participate fully, contribute meaningfully, and feel they matter.

By designing with difference in mind from the start, Sacramento County can move from reactive accommodation to proactive inclusion—and become a leader in building systems where everyone belongs.

## Recommendations

To help Sacramento County become a model of adaptive, inclusive public service, the DAC recommends:

1. Recruit and hire a full-time qualified Chief of ADA Compliance, and establish full-time support staff (Senior Personnel Analyst and Personnel Analyst) with a clear succession plan.
2. Move the Disability Compliance Office (ADA/Title II) to report directly to the County Executive, and align job classifications appropriately.
3. Establish a new Countywide specialized job classification series for ADA compliance professionals in the DCO and across departments.
4. Develop and adopt a five-year Vision & Action Plan for the DCO, with DAC input.
5. Ensure the DCO serves a countywide function, coordinating access and compliance across all departments.
6. Model the DCO’s structure after adaptive, high-impact offices in leading jurisdictions (e.g., San Francisco).

### Implementation Pathway

The recommendations in this paper are designed to be actionable. While each step builds toward a resilient and integrated Disability Compliance Office, the County can begin with foundational actions that set long-term success in motion.

We recommend that implementation begin with the reinstatement of the Chief of ADA Compliance role and the realignment of the DCO’s reporting structure to the County Executive Office. These first two steps create the authority and visibility required to coordinate access across all departments.

To support sustainable progress, we also recommend the formation of a cross-departmental ADA Compliance Working Group, coordinated through the County Executive Office with involvement of the DAC. This group can begin drafting a phased implementation plan aligned with the five-year Vision & Action Plan described in this paper.

Together, these steps provide a clear and collaborative path forward—turning intention into infrastructure and vision into daily practice.

## Supporting Justifications

### 1. Establish ADA Chief Position and Team

ADA compliance is a living, strategic function, not a one-time project. Expecting one individual to serve all departments without leadership authority or support staff exposes the County to systemic risk. Establishing a senior-level ADA Chief position, supported by a dedicated team, creates a structure built for resilience, expertise, succession, and collaboration. Teams allow knowledge-sharing, redundancy, and cross-departmental partnerships that reduce complaints, protect the County legally, and ensure that progress survives inevitable staff transitions.

### 2. DCO Reporting Structure

The cornerstone of a thriving disability compliance office in today's intricate regulatory landscape is a robust compliance program. At the heart of any successful program lies a strong, independent ADA coordinator with the authority to act decisively. The key to empowering the County’s ADA coordinator is a direct reporting structure to the County Executive.

Clear reporting lines are critical to the effectiveness of any compliance office. Independent reporting ensures that accessibility concerns are not buried, minimized, or compromised by departmental conflicts of interest.

“An effective compliance program must be independent and empowered, reporting directly to governing authorities or senior leadership to ensure that compliance risks are identified, elevated, and addressed in a timely manner.” (Society of Corporate Compliance and Ethics, Compliance & Ethics Professional’s Handbook, 2nd Ed.)

Public and private sector best practices, including guidance from the Society of Corporate Compliance and Ethics (SCCE) and models from cities such as San Francisco and Los Angeles, consistently reinforce that high-level, independent reporting is a hallmark of effective compliance leadership.

A direct reporting relationship to the County Executive ensures independence, elevates accessibility concerns appropriately, promotes proactive compliance management, and fosters a culture of transparency and ethical conduct.

### 3. Create ADA Compliance Job Series

ADA compliance work demands specialized knowledge that spans law, architecture, public policy, communications, and service delivery. Generic classifications like Personnel Technician or Analyst do not adequately reflect the complexity, interdisciplinary scope, and legal sensitivity of this role. Establishing a dedicated ADA Compliance job classification series ensures the County can attract, retain, and promote qualified professionals and signals commitment to access and best practices.

### 4. Develop a Five-Year Vision & Action Plan

Resilient systems do not evolve by accident—they plan for the future while adapting to change. A five-year Vision & Action Plan would provide a roadmap, identify goals, metrics, and adjustments, and signal commitment to continuous improvement, proactive risk management, and long-term equity. Having a forward-looking plan makes resource requests and operational adjustments clear and defensible.

### 5. Ensure the DCO Serves a Countywide Function

ADA and Title II compliance affect every department and service offered by Sacramento County. Siloed compliance efforts lead to fragmentation and gaps. Establishing a countywide DCO function ensures unified standards, consistent training, shared accountability, and public trust. Every department becomes an active participant in advancing access and inclusion.

### 6. Model the DCO After Leading Jurisdictions

Sacramento County is not alone in facing these challenges. Cities like San Francisco and Los Angeles have demonstrated that embedding disability compliance leadership at the executive level strengthens trust, reduces risk, and builds resilient, inclusive systems. Sacramento County can join these leaders by adopting proven, effective structures.

### Conclusion

Access is not a separate initiative—it is the structure that allows everything else to function with integrity. As Sacramento County continues to grow and evolve, this moment offers a rare opportunity: to realign not just one office, but an entire system, around the values of inclusion, resilience, and shared responsibility.

What we are proposing is not new. It’s a return to a model that worked, refined by what we’ve learned and reimagined for what’s possible. We are not asking for a leap—we are asking for a restoration of clarity, capacity, and courage at the center of the County’s compliance efforts.

By investing in the Disability Compliance Office as a countywide function rooted in leadership, coordination, and vision, Sacramento County can become a model for how government serves—not just some, but all.

The Disability Advisory Commission is ready to walk this path with you.