



JOHN A. WAGNER
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



ARNOLD SCHWARZENEGGER
GOVERNOR

October 27, 2010

Julie Tiede, Director
Mono County Dept. of Social Services
P.O. Box 2969
Mammoth Lakes, CA 93546

Dear Ms. Tiede:

This letter is to acknowledge your letter of October 19, 2010, wherein you advise us that your corrective actions are completed. Thank you also for the CD with the photographs of the cited items.

We appreciate your efforts in regard to your civil rights practices and procedures, and your efforts to ensure that all of our applicants and recipients have access to our services.

If you have any questions, please contact me at (916) 654-2107. You may also contact me by e-mail at jim.tashima@dss.ca.gov

Sincerely,^c

JIM TASHIMA, Acting Chief
Civil Rights Bureau
Human Rights & Community Services Division

c: Jan Priddy, Interim Civil Rights Coordinator

Chris Webb-Curtis, Branch Chief, CDSS Supplemental Nutrition Assistance Program
Food Stamps Policy Bureau M.S. 8-9-32

Mike Papin, CDSS Supplemental Nutrition Assistance Program
Food Stamps Policy Bureau M.S. 8-9-32

Richard Trujillo, CDSS Supplemental Nutrition Assistance Program
Food Stamps Policy Bureau M.S. 8-9-32

Paul Gardes, CDSS Supplemental Nutrition Assistance Program
Food Stamps Policy Bureau M.S. 8-9-32

Brian Tam, CDSS Supplemental Nutrition Assistance Program
Food Stamps Policy Bureau M.S. 8-9-32

Thuan Nguyen, Refugee Programs Bureau, M.S. 8-8-46

Joe Torres, Office of Civil Rights
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Dominic Pagano, Office of Civil Rights
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Hope Rios,
USDA Food and Nutrition Services,
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Claudia Cabrera, Program Consultant, Civil Rights Bureau



Office of the ... DEPARTMENT OF SOCIAL SERVICES

AUG 23 2010

C O U N T Y O F M O N O

P.O. Box 576 • Bridgeport • California • 93517-0576

JULIE TIEDE
Director

BRIDGEPORT OFFICE
(760) 932-5600
FAX (760) 932-5287

MAMMOTH LAKES OFFICE
(760) 924-1770
FAX (760) 924-5431

August 17, 2010



Mr. Jim Tashima, Acting Chief
Civil Rights Bureau
California Department of Social Services
744 P Street, MS 8-16-70
Sacramento, CA 95814

RE: Mono County Civil Rights Corrective Action Plan

Dear Mr. Tashima:

Enclosed please find the required Mono County Corrective Action Plan (CAP). The proposed Corrective Action is set forth in red next to the Findings. As indicated in the CAP the County, working together with the Landlord where appropriate, is expecting the items to be completed within 60 days, with the exception of one item where it is anticipated 90 days are necessary. Mono County will monitor the progress of all items and will contact you in the event any of the items will not be completed within the time frame indicated. We do have a monitoring meeting set for September 8, 2010 to insure we will have the work done in a timely manner. I appreciated all the assistance from your office including all the time spent by Tiffany Marsh providing me with an electronic version of the Audit (she spent a lot of time saving me time!). Please feel free to contact me directly at 760-924-1790 with any questions or concerns you may have. Again, thank you for your time and courtesies in this matter.

Sincerely,

Julie M. Tiede
Director, Mono County Department of Social Services
Enc.

Cc: Marshall Rudolph, Mono County, County Counsel
Rita Sherman, Mono County Assistant CAO, Risk Management
Joe Blanchard, Mono County Public Works
Rick Terrell, Blizzard Property Management

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR COUNTY OF
Mono Department of Social Services
Conducted
November 17-19, 2009**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
Sacramento, CA 95814
(916) 654-2107**

Reviewer

Claudia Cabrera

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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 Mono County Department of 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 November 17-18, 2009, with an exit meeting held with Kathy Watkins, Civil Rights Coordinator to review the 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)
Mono County Department of Social Services	85 Emigrant Rd. Bridgeport	NAFS, CalWORKs, Adult Services, Children Services	None
Mono County Department of Social Services	452 Old Mammoth Rd. Mammoth Lakes	NAFS, CalWORKs, Adult Services, Children Services	Spanish

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2008 Annual Civil Rights 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.

Headquarters and on-site review procedures included:

- 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

Due to budget and staffing constraints, public contact staff interviews were not held during this review.

Program Manager Surveys

Number of surveys distributed	1
Number of surveys received	1

Reviewed Case Files

English speakers' case files reviewed	13
Non-English or limited-English speakers' case files reviewed	13
Languages of clients' cases	English, Spanish

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 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	Comments
Does the county have a written policy to accommodate clients who cannot go to the office during normal business hours?	X		Staff will accommodate clients by scheduling appointments after normal business hours.
Can applicants access services when they cannot go to the office?	X		Clients can access services via telephone, mail and in home visits.
Does the county ensure the awareness of available services for individuals in remote areas?	X		Staff provides information of available services through their website, at Senior and Family Health Fairs, Kidapalooza and at Hospital Health fairs.

Signage, posters, pamphlets	Yes	No	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)?	X		
Is the pamphlet distributed and explained to each client at intake and re-certification?	X		PUB 13 is provided to clients in the application packet.
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?	X		All offices reviewed had the current version of the PUB 13 available.
Was the Pub 13 available in large print, audiocassette/CD and Braille?	X		All offices reviewed had the current version of the PUB 13 available in Braille, CD and large print.
Were the current versions of the required posters present in the lobbies?	X		The PUB 86 and the And Justice for All posters were present in the lobbies.
Were there instructional and directional signs posted in waiting	X		Instructional and directions signs were

Signage, posters, pamphlets	Yes	No	Comments
areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?			available in English and Spanish.

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.

A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

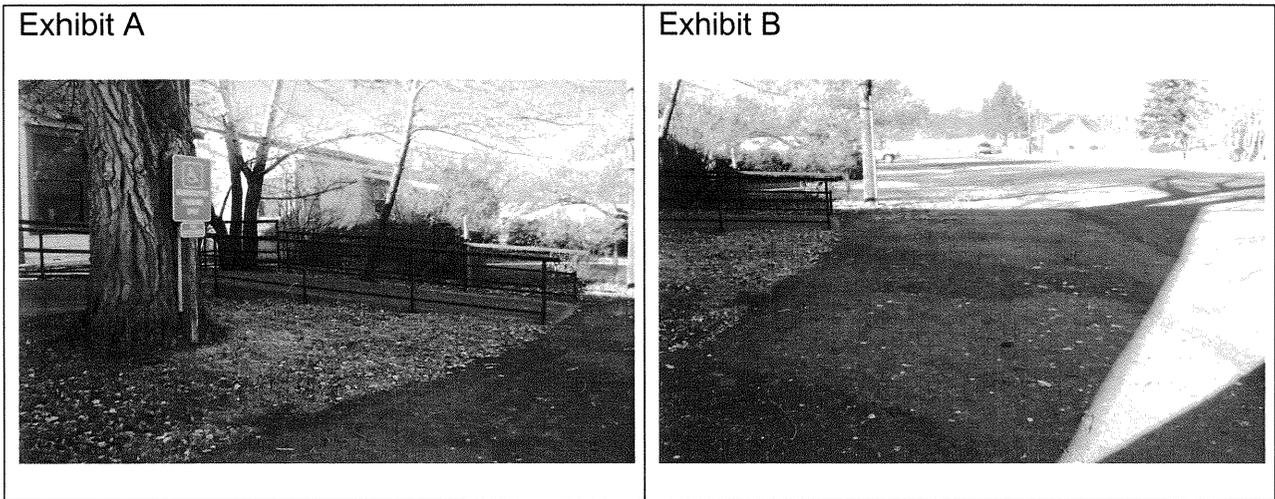
Facility Location: 85 Emigrant Rd., Bridgeport

Facility Element	Findings	Corrective Action
Parking County will provide "Unauthorized Parking" signage as required. Such signage expected to be provided within 60 days from	There was no "Unauthorized Parking" sign at entrance to off-street accessible parking.	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

<p>submission of this Corrective Action Plan (herein after CAP).</p> <p>County to provide signage which includes required "Minimum Fine \$250.00" language. Such signage expected to be in place within 60 days from submission of this CAP.</p> <p>County to paint or retain Contractor to paint required surface identification, including lines and signage. Such identification is expected to be completed within 60 days from the submission of this CAP.</p> <p>Within 60 days from submission of CAP County to take all necessary action to insure that length of parking space is as required.</p> <p>County to provide access aisle for van parking within 60 days from</p>	<p>The van-accessible sign is missing the "Minimum Fine \$250.00" sign.</p> <p>There are no visible lines painted on the street surface for the van-accessible parking stall (see Exhibit A below).</p> <p>There is no signage on pavement clearly depicting a wheelchair w/ occupant (see Exhibit A below).</p> <p>There is no access aisle for the van-accessible parking available.</p>	<p>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>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>The surface of each accessible parking stall or space must have a surface identification duplicating either of the following schemes:</p> <ul style="list-style-type: none"> (a) By outlining or painting the stall or space in blue and outlining on the ground in the stall or space in white or suitable contrasting color a profile view depicting a wheelchair with occupant; OR (b) By outlining a profile view of a wheelchair with occupant in white on blue background. The profile view shall be located so that it is visible to a traffic enforcement officer when a vehicle is properly parked in the space and shall be 36" by 36". (CA T24 1129B.4.1 & 2) p 133 <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>Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.3.1, ADA 4.6.3) p 135</p>
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<p>submission of this CAP. County to paint or retain Contractor to paint required signage in access aisle. Such signage to be completed within 60 days from submission of this CAP.</p>	<p>The words “No Parking” are not painted in access aisle, as there is no access aisle (see Exhibit B below).</p>	<p>The words “NO PARKING” shall be painted on the ground in each 5’ or 8’ loading and unloading access aisle in white letters no smaller than 12”. (CA T24 1129B.4.1 & 2) p 135</p>
<p>Main Entrance</p> <p>The County will provide the required ISA sign within 60 days from the submission of this CAP.</p> <p>The County will adjust or retain Contractor to adjust door pressure as required. Such adjustment is expected to be completed within 60 days from the submission of this CAP.</p> <p>The County will provide a smooth uninterrupted surface as required within 60 days from the submission of this CAP.</p>	<p>There is no ISA sign.</p> <p>Door pressure excessive at 20 lbs.</p> <p>Bottom 10” of door does not have a smooth, uninterrupted surface.</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 396</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 195</p> <p>The bottom 10” of all doors except automatic and sliding shall have a smooth, uninterrupted surface to allow the door to be opened by a wheelchair footrest without creating a trap or hazardous condition. (CA T24 1133B.2.6) p 203</p>

B. Recommendation



A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 452 Old Mammoth Rd., Mammoth Lakes

Facility Element	Findings	Corrective Action
<p>Parking</p> <p>Building is leased by County. The County is working with Landlord to have required signage posted. County shall monitor progress for completion and expects signage to be completed within 60 days from the submission of this CAP.</p> <p>Building is leased by County. The County is working with the Landlord to have the required signage painted. The County shall monitor</p>	<p>There was no “Unauthorized Parking” sign at entrance to off-street accessible parking.</p> <p>The words “No Parking” are not painted in access aisles (see Exhibit C below).</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>The words “NO PARKING” shall be painted on the ground in each 5’ or 8’ loading and unloading access aisle in white letters no smaller than 12”. (CA T24 1129B.4.1 & 2) p 135</p>

<p>progress and expects the signage to be completed within 60 days from the submission of this CAP.</p>		<p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p 135</p>
<p>Mono County is working with the Landlord to have the required parking spaces available together with the appropriate signage. Mono County will monitor the progress and expects that the work will be completed within 60 days of the submission of this CAP.</p>	<p>Underground Parking: There is no van-accessible parking space.</p>	<p>One in every 8 accessible spaces (p 136) and no less than 1 shall be served by an access aisle 96" wide minimum placed opposite the driver's side and shall be designated Van-Accessible (CA T24 1129.B.4.2, ADA 4.1.2(5)(b)) p 135 Van-accessible spaces shall have a sign "Van-Accessible" mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space. (CA T24 1129B.5, ADA 4.6.4) p 133</p>
<p>Mono County is working with the Landlord to provide the required signage. Mono County will monitor the progress and expects that the work will be completed within 60 days of the submission of the CAP.</p>	<p>There is no appropriate freestanding or wall mounted ISA sign (see Exhibit D below).</p>	<p>Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.4.1, ADA 4.6.5) p 134 Wall signage shall be centered 36" minimum above grade, ground, or sidewalk at the interior end of space. (CA T24 1129B.3.1) p 134</p>
<p>Mono County is working with the Landlord to provide the required painted signage and will monitor the progress. The County expects that this work will be</p>	<p>The words "No Parking" are not painted in access aisles (see Exhibit E below).</p>	<p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p 135</p>

completed within
60 days from the
submission of this
CAP.

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<p>Route to Main Entrance Mono County is working with the Landlord to insure the signs are placed at the required height and are visible. Mono County will monitor the progress, and expects the work to be completed with 60 days from the submission of this CAP.</p>	<p>The ISA sign was located too high and not within a visible area (see Exhibit F below).</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>Elevator Mono County is working with the Landlord to insure there is appropriate visual signal and that the landing jamb signage is properly located. Mono County will monitor the progress and expects the work to be completed within 60 days from the submission of this CAP.</p>	<p>The visual control on the third floor does not light up (see Exhibit G 1 below).</p> <p>The landing jamb signage indicating floor number is low at 48 ½ in (see Exhibit G 2 below).</p>	<p>A visual and audible signal is provided at each hoist way entrance indicating to the prospective passenger the car answering the call and its direction of travel. (CA T24 1116B.1.13, ADA 4.10.4) p 256</p> <p>Passenger elevator landing jambs on all elevator floors have the number of the floor on which the jamb is located designated by raised characters that are a minimum of 2" in height, Grade 2 Braille, located 60" on center above the floor on the jamb panels on both sides of the door so that they are visible from within the elevator. (CA T24 1116.B.1.14, ADA 4.10.5) p 257</p>

<p>Main Entrance The County will adjust or retain a contractor to adjust door pressure as required and will provide the required surface. The County expects this to be completed within 60 days from the submission of this CAP.</p>	<p>Door pressure at main entrance to office is excessive at 10 lbs.</p> <p>Bottom 10" of door does not have a smooth, uninterrupted surface (see Exhibit H below).</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 195</p> <p>The bottom 10" of all doors except automatic and sliding shall have a smooth, uninterrupted surface to allow the door to be opened by a wheelchair footrest without creating a trap or hazardous condition. (CA T24 1133B.2.6) p 203</p>
<p>Men's Restroom Mono County is working with the Landlord to insure that the appropriate signage is in place and is an appropriate place. Mono County is monitoring this work and expects it to be completed within 60 days from this CAP.</p> <p>Mono County will or retain a Contractor to adjust the door pressure as required. It is expected this will be completed within 60 days from the submission of this CAP.</p>	<p>Sign on door is high at 64 in (see Exhibit I below).</p> <p>There is no sign on the wall (see Exhibit I below).</p> <p>Door pressure excessive at 20 lbs.</p>	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>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 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 263</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 195</p>

<p>The County will work with the Landlord to insure the urinal rim and paper towel dispensers are at the required height. The County is monitoring the work and expects the work to be completed within 90 days from the submission of the CAP.</p>	<p>Accessible urinal rim too high at 25 in above the floor.</p> <p>Paper towel dispenser too high at 46 in.</p>	<p>Rim height shall be a maximum of 17" in height above the floor. (CA T24 1115B.4.2.1) 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-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p 269</p>
<p>Women's Restroom</p> <p>Mono County is working with the Landlord to insure that the proper signage is in place and is at the correct height. Mono County will monitor the progress and expects the work to be completed within 60 days from the completion of this CAP.</p> <p>Mono County will adjust or retain a Contractor to adjust the door pressure as required. Mono County expects the work to be completed within 60 days from the</p>	<p>Sign on door is high at 66 in (see Exhibit J below).</p> <p>There is no sign on the wall.</p> <p>Door pressure excessive at 15 lbs.</p>	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>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 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 263</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 195</p>

<p>submission of this CAP.</p> <p>Mono County is working with the Landlord to insure that the toilet protector, the paper towel dispenser and the tissue dispenser are placed as required. Mono County will monitor the progress and expects this work to be completed within 60 days from the submission of this CAP.</p>	<p>Toilet protector dispenser too high at 53 in.</p> <p>Paper towel dispenser too high at 44 in.</p> <p>Toilet tissue dispenser located too far at 24 in. from front edge of toilet.</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-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p 269</p> <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp 275, 269</p>
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B. Recommendation

There is no signage indicating where the men's restroom is located. It is recommended that a directional sign be posted on the wall designating the men's restroom is at the end of the hall to the right past the women's restroom.

Mono County is working with the Landlord to implement this recommendation. Mono County will monitor the progress and expects that this will be completed within 60 days from the submission of this CAP.

It is also recommended that bumpers be installed on the parking spaces identified below. A bumper is required to prevent encroachment of cars over the required width of walkways (CA T24 1129B.3.3) (ADA 4.7.8). See Exhibit K.

Mono County and the Landlord are working together to determine the ability to implement this recommendation. A meeting has been will be set for the first week of September 2010 to address this recommendation and possible implementation.

Exhibit C



Exhibit D



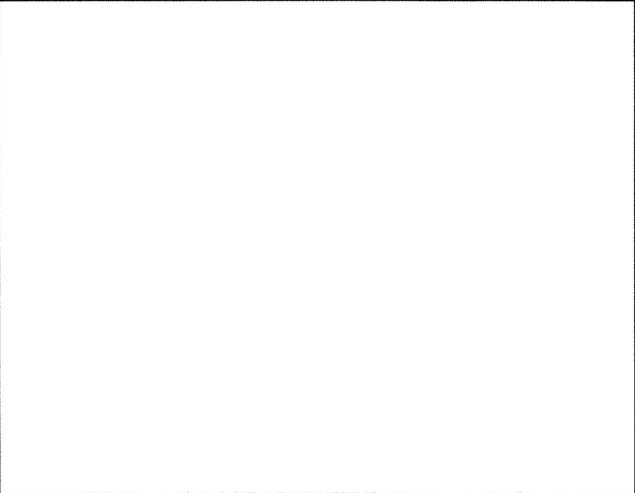


Exhibit E



Exhibit F



Exhibit G 1



Exhibit H

Exhibit G 2

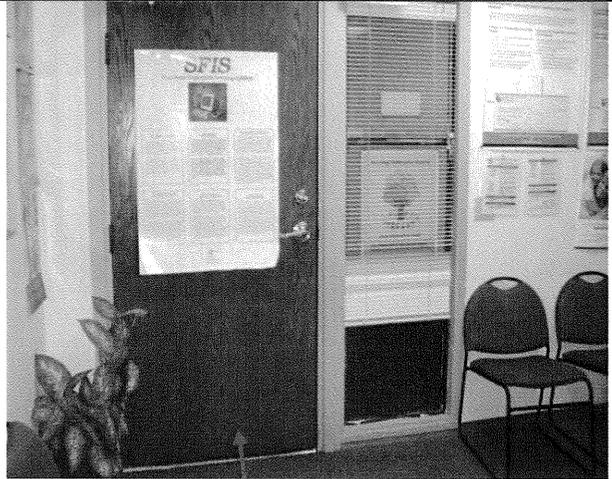


Exhibit I



Exhibit J



Exhibit K



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 Limited English Proficiency (LEP) 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, and Case File Reviews

Question	Yes	No	Comments
Does the county identify a client's language need upon first contact?	X		Clients are given the Language Preference Designation Form to identify their language need.
Does the county use a primary language form?	X		Mono county uses the Language Preference Designation Form and it is color coded in blue.
Does the client self-declare on this form?	X		The client fills out the form.
Are LEP clients provided bilingual services?	X		LEP and non-English speaking clients are assigned to a bilingual staff for CalWORKs and FS. Mono County does not currently have bilingual staff available for IHSS or Children's Services, therefore, clients are provided with certified interpreters within the Department or through the use of Tele-Interpreters.
After it has been determined that the client is an LEP client, is there a county process for procuring an interpreter?	X		Clients will either be assigned to a bilingual staff or be provided with an interpreter via Tele-interpreters.
Is there an undo delay in providing services?	X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X		Mono county has five bilingual Spanish-speaking staff located in the Mammoth Lakes office. They also have access to Tele-Interpreters.
Are county interpreters determined to be competent?	X		The Spanish-speaking bilingual staff are county certified.
Does the county have adequate interpreter services?		X	There are no bilingual staff for IHSS and Children's Services. Mono County continues to seek qualified bilingual staff for these programs in all recruitments. The County offers additional pay to qualified employees in an attempt to secure bilingual services for the County.
Does the county use the	X		The Forms Coordinator keeps track of all

Question	Yes	No	Comments
Is the information that is to be inserted into various forms (i.e. NOAs, letters, case plans, etc.) 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/CDs, large print materials (besides the Pub 13)?	X		Large print and Braille are available for individuals with visual impairments and TDD and ASL interpreters are available for individuals with hearing impairments.
Does the county identify and assist clients who have learning disabilities or who cannot read or write?	X		Staff will assist a client who cannot read or write by helping them fill out paperwork or reading out loud to them.

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	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Ethnic origin documentation	Emergency Response Referral Info sheet	SOC 295	C-IV, DFA-285, SOF	C-IV, DFA-285, SOF
Primary language documentation	Emergency Response Referral Info sheet	Primary Language Designation Form, SOC 295	C-IV, DFA-285, SOF	C-IV, DFA-285, SOF
Method of providing bilingual services and documentation	Case narrative	Primary Language Designation Form	Primary Language Designation Form, ISAWS case comments	Primary Language Designation Form, ISAWS case comments
Client provided own interpreter	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed
Method to inform client of potential problem using own interpreter	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed
Release of information to Interpreter	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed
Individual's acceptance or refusal of written material offered in primary language	None found in cases reviewed	Primary Language Designation Form	Primary Language Designation Form	Primary Language Designation Form
Documentation of minor used as interpreter	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed
Documentation of	None found in	None found in	None found	None found in

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
circumstances for using minor interpreter temporarily	cases reviewed	cases reviewed	in cases reviewed	cases reviewed
Translated forms (NOA, case plans, letters, etc.) contain translated inserts	None found in cases reviewed	Case file	Case file	Case file
Method of identifying client's disability	CMS-CWS	Case narrative	SOF	SOF
Method of documenting a client's request for auxiliary aids and services	CMS-CWS	Case narrative	ISAWS case comments	ISAWS case comments

B. Corrective Actions

None

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	Comments
Do employees receive continued Division 21 Training?	X		Division 21 training is provided annually.
Do employees understand the county policy regarding a client's rights and the procedure to file a discrimination complaint?	X		Staff are aware that all discrimination complaints are to be referred to the civil rights coordinator.

VIII. CONCLUSION

The CDSS found the Mono County Department of Social Services in satisfactory

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.

Mono County DSS must remedy the violations 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 by which all actions will be taken to correct the violations.

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.