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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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GAVIN NEWSOM
GOVERNOR

January 30, 2019

Tammy Moss Chandler, Director
Mendocino County Department of Social Services
P.O. Box 1060
Ukiah, CA 95482

Dear Ms. Chandler:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of November 26 through November 30, 2018. Enclosed is the final report on the review.

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 60 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 enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with the Americans with Disabilities Act website accessibility, we also require the CAP to be submitted electronically as a Word document via [Civil Rights Unit email](mailto:crb@dss.ca.gov) (crb@dss.ca.gov).

We will provide a copy of your 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. In addition, these documents are published on our [Civil Rights Unit website](http://www.cdss.ca.gov/inforesources/Civil-Rights/Compliance-Reports-and-Corrective-Action-Plans) (<http://www.cdss.ca.gov/inforesources/Civil-Rights/Compliance-Reports-and-Corrective-Action-Plans>).

If you need technical assistance in the development of your CAP, please feel free to contact James Urquizo at (916) 654-2101. You may also contact us via [Civil Rights Unit e-mail](mailto:crb@dss.ca.gov) (crb@dss.ca.gov).

Sincerely,

CHRISTINA TEIXEIRA, Manager
Civil Rights Unit
Housing, Homelessness, and Civil Rights Branch

Enclosure

c: Bekkie Emery, Civil Rights Coordinator

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
MENDOCINO COUNTY DEPARTMENT OF SOCIAL
SERVICES**

**Conducted on
November 26 through November 30, 2018**

**California Department of Social Services
Housing, Homelessness, and Civil Rights Branch
Civil Rights Unit
744 P Street, M.S. 8-16-70
Sacramento, CA 95814
(916) 654-2107**

Reviewer: JAMES URQUIZO

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I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Unit (CRU) staff was to assess the Mendocino 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 26 through November 30, 2018. An exit interview was held on November 30, 2018 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)
Fort Bragg Office	764 South Franklin Street, Fort Bragg, CA	Adult Services, Children Services	Spanish
Willits Integrated Services Office	221 Lenore Avenue, Willits CA	Children and Family Services, CalWORKs, Adult Services	Spanish
Yokayo Center	727 737, 747 South State Street, Ukiah CA	Children and Family Services, CalWORKs, CalFresh	Spanish
Cherry Court Family Center	10 Cherry Court, Ukiah CA	Children and Family Services	Spanish

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2018-2019 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 civil rights coordinator
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussion with community advocate group. In this review the following organization was contacted for feedback.

Court Appointed Special Advocates for Children (CASA) of Lake & Mendocino County
340 N. Main Street, Suite A
Ukiah, CA 95482
(707) 463-6503

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Program Accessibility for Clients with Disabilities (physical, mental, learning, visual or hearing impairment, etc.)
- Bilingual Staffing/Services for Non-English-Speaking Clients
- 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	15	10
Children Social Workers	10	8
Adult Program Workers	10	2
Receptionist/Screeners	4	1
Total	39	21

An additional (10) interviews were scheduled but were not conducted due to staff unavailability.

Civil Rights Coordinator and Program Manager Surveys

Number of surveys distributed: (4)

Number of surveys received: (4)

Reviewed Case Files

English speakers' case files reviewed: (14)

Spanish speakers' case files reviewed: (21)

Asian speakers' case files reviewed: (1)

Languages of clients' cases: (3)

Reasonable Accommodation cases reviewed: (2)

Sections III through IX 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 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 X evaluates the County's Call/Service Centers services provided to non-English speaking clients and clients with a disability.

Section XI 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 XII highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XIII 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

Question (Please answer yes/no and provide response with comments.)	Comments
Does the County accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	Yes, clients are able to mail documents necessary to complete services application(s) and setup appointments for after-hours services.
Can clients, including those with disabilities, access services when they are unable to go to the office?	Yes, online services are available for clients to use after-hours and when they are unable to go to the office
Does the County ensure the awareness of available services individuals in remote areas?	Yes, the County has informational outreach programs to reach all individuals in remote areas.

B. Findings: Signage, Posters and Pamphlets

Question (Please answer yes/no and provide response with comments.)	Comments
Does the County use the CDSS pamphlet "Your Rights under California Welfare Programs" (PUB 13)?	Yes, PUB 13's are available to all clients in the lobby and other languages behind the counter.
Is the pamphlet distributed and explained to each client at intake and re-certification?	Yes, at intake all clients are briefed using the PUB 13 and handed the brochure. The PUB 13 is also mailed to those clients that cannot pick up the PUB 13 at the office.
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, and Vietnamese?	Yes, receptionists are aware of where to obtain PUB 13's in other languages at an CDSS website.

Question (Please answer yes/no and provide response with comments.)	Comments
Were the current versions of the required posters present in the lobbies?	<p>Yes, current versions of the required posters were available and visibly posted, including:</p> <p>And Justice for All (Form 475B) Everyone is Different, but Equal under the Law (PUB 86)(Revised 03/07, with current Civil Rights Coordinator contact information)</p>
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?	Yes, instructional and directional signs are well posted in lobby areas for clients to utilize.

C. Corrective Actions: None

D. Recommendation: None

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

1. Facility Location: Fort Bragg Office, 764 South Franklin St., Fort Bragg, CA

Facility Element/Finding	Corrective Action
<p><u>Unisex Restrooms</u></p> <p>Two Unisex Bathroom Door signs are not compliant with ADA raised lettering signs. (Building 7C)</p>	<p>Men's toilet and bathing facilities shall be identified by an equilateral triangle, ¼ inches thick with edges 12 inches long and a vertex pointing upward. (CA T24 11B-703.7.2.6.1) CARM page 376</p> <p>The triangle symbol shall contrast with the door, either light on a dark background or dark on a light background. (CA T24 11B-703.7.2.6.1) CARM page 376</p> <p>The triangle symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol. (CA T24 11B-703.7.2.6) CARM page 376</p> <p>Where a door is provided the triangle symbol shall be mounted within 1 inches of the vertical centerline of the door. (CA T24 11B-703.7.2.6) CARM page 376</p> <p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. (CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</p>
<p><u>Directional & Informational Signage</u></p> <p>Smoke free sign at front entry/threshold of building is not in all threshold languages. (Building 7A)</p>	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (MPP Division 21-107.212)</p>

Facility Element/Finding	Corrective Action
<p><u>Lobby</u></p> <p>When the receptionist was asked to present a copy of a Civil Rights Complaint form, one was not readily available. (Building 7C)</p>	<p>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.</p> <p>The pamphlets shall be in the primary languages of the CWD’s applicant/recipient population including alternate formats (example, cassette tapes, large print, etc.). (MPP Division 21-107.221)</p>

a. **Corrective Actions:** Refer to Corrective Action column above (Section A, 1).

b. **Recommendations:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 1).

2. Facility Location: 221 Lenore Avenue, Willits CA

Facility Element/Finding	Corrective Action
<p><u>Disabled Parking</u></p> <p>All Disabled Parking spaces lines need to be repainted.</p>	<p>The parking space shall be marked with an International Symbol of Accessibility (Symbol) in white on a blue background at a minimum 36 inches wide by 36 inches high. (CA T24 11B-502.6.4.1) CARM page 159</p> <p>OR</p> <p>In white or a suitable contrasting color. (CA T24 11B-502.6.4.2) CARM page 159</p> <p>The centerline of the Symbol shall be a maximum of 6 inches from the centerline of the parking space, its sides parallel to the length of the parking space and its lower corner at, or lower side aligned with, the end of the parking space length. (CA T24 11B-502.6.4.2) CARM page 159</p> <p>The words NO PARKING shall be painted on the surface of each access aisle.</p>

Facility Element/Finding	Corrective Action
	<p>(CA T24 11B-502.3.3) CARM page 166</p> <p>This notice shall be painted in white letters a minimum of 12 inches in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3) CARM page 166</p> <p>Access aisles shall be marked with a blue painted borderline around their perimeter. (CA T24 11B-502.3.3) (ADA 502.3.3) CARM page 164</p> <p>The area within the blue borderlines shall be marked with hatched lines a maximum of 36 inches on center in a color contrasting with that of the aisle surface, preferably blue or white. (CA T24 11B-502.3.3) CARM page 164</p>
<p><u>Disabled Parking</u></p> <p>Three west side ADA Parking spaces need parking wheel stops.</p>	<p>A curb or wheel stop shall be provided if required to prevent encroachment of vehicles over the required clear width of adjacent accessible routes. (CA T24 11B-502.7.2) CARM page 162</p>
<p><u>Disabled Parking</u></p> <p>All non-ADA parking spaces that are in the path of travel from ADA spaces to front of the building need to have parking wheel stops.</p> <p>(West Side: 14 spaces and South Side: 10 spaces)</p>	<p>A curb or wheel stop shall be provided if required to prevent encroachment of vehicles over the required clear width of adjacent accessible routes. (CA T24 11B-502.7.2) CARM page 162</p>

- a. **Corrective Actions:** Refer to Corrective Action column above (Section A, 1).
- b. **Recommendations:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 1).

3. Facility Location: Yokayo – 727, 737, 747 South State Street, Ukiah, CA

BUILDING 727 – FACILITY WALK THROUGH: PARKING LOT

Facility Element/Finding	Corrective Action
<p><u>Disabled Parking</u></p> <p>ADA parking lines, across the street from the building all need to be repainted, to include access aisle lines.</p>	<p>The parking space shall be marked with a Symbol in white on a blue background at a minimum of 36 inches wide by 36 inches high. (CA T24 11B-502.6.4.1) CARM page 159</p> <p>OR</p> <p>In white or a suitable contrasting color. (CA T24 11B-502.6.4.2) CARM page 159</p> <p>The centerline of the Symbol shall be a maximum of 6 inches from the centerline of the parking space, its sides parallel to the length of the parking space and its lower corner at, or lower side aligned with, the end of the parking space length. (CA T24 11B-502.6.4.2) CARM page 159</p> <p>The words NO PARKING shall be painted on the surface of each access aisle. This notice shall be painted in white letters a minimum of 12 inches in height and located to be visible from the adjacent vehicular way. (CA T24 11B-502.3.3) CARM page 166</p> <p>Access aisles shall be marked with a blue painted borderline around their perimeter. (CA T24 11B-502.3.3) (ADA 502.3.3) CARM page 164</p> <p>The area within the blue borderlines shall be marked with hatched lines a maximum of 36 inches on center in a color contrasting with that of the aisle surface, preferably blue or white. (CA T24 11B-502.3.3) CARM page 164</p>
<p><u>Disabled Parking</u></p> <p>Access aisle for one van ADA parking space is missing.</p>	<p>Access aisle minimum dimensions: 5 feet wide by 18 feet long. (CA T24 11B-502.2) (ADA 4.6.3) CARM page 167</p>

Facility Element/Finding	Corrective Action
	The parking access aisles shall adjoin an accessible route. (CA T24 11B-502.3) (ADA 502.3) CARM page 167

- a. Corrective Actions:** Refer to Corrective Action column above (Section A, 1).
- b. Recommendations:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 1).

BUILDING 737 – FACILITY WALK THROUGH PARKING LOT

Facility Element/Finding	Corrective Action
<p><u>Disabled Parking</u></p> <p>Two Access Ramps protrude into the parking floor from the sidewalk. (Entrance and Exit pathways)</p>	<p>Access aisles for van parking spaces shall be located on the passenger side of the parking spaces. (CA T24 11B-502.3.4) (ADA 502.3.4) CARM page 167</p> <p>Access aisles shall not overlap the vehicular way. (CA T24 11B-502.3.4) (ADA 502.3.4) CARM page 167</p> <p>Curb ramps and the flared sides of curb ramps shall be located so that they do not project into vehicular traffic lanes, parking spaces or parking access aisles. (CA T24 11B-406.5.1) (ADA 406.5) CARM page 193</p>
<p><u>Disabled Parking</u></p> <p>Fencing protrudes into the ADA parking space.</p>	<p>Access aisles for van parking spaces shall be located on the passenger side of the parking spaces. (CA T24 11B-502.3.4) (ADA 502.3.4) CARM page 167</p> <p>Access aisles shall not overlap the vehicular way. (CA T24 11B-502.3.4) (ADA 502.3.4) CARM page 167</p> <p>Curb ramps and the flared sides of curb ramps shall be located so that they do not project into vehicular traffic lanes, parking spaces or parking access aisles. (CA T24 11B-406.5.1) (ADA 406.5) CARM page 193</p>
<p><u>Disabled Parking</u></p> <p>A disabled wheelchair client must travel into the traffic path behind one vehicle</p>	<p>Parking spaces and access aisles shall be designed so that persons using them are not required to travel behind parking spaces other than to pass behind the parking space in which they parked. (CA T24 11B-502.7.1) CARM page 162</p>

Facility Element/Finding	Corrective Action
space to get into the front entry.	Access aisles shall adjoin an accessible route. (CA T24 11B-502.3) (ADA 502.3) CARM page 164

- a. Corrective Actions:** Refer to Corrective Action column above (Section A, 1).
- b. Recommendations:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 1).

BUILDING 747 – FACILITY WALK THROUGH PARKING LOT

Facility Element/Finding	Corrective Action
<p><u>Disabled Parking</u></p> <p>ADA parking lines, directly in front of the building, need to be repainted.</p>	<p>The parking space shall be marked with a Symbol in white on a blue background - a minimum 36 inches wide by 36 inches high. (CA T24 11B-502.6.4.1) CARM page 159</p> <p>OR</p> <p>In white or a suitable contrasting color. (CA T24 11B-502.6.4.2) CARM page 159</p> <p>The centerline of the Symbol shall be a maximum of 6 inches from the centerline of the parking space, its sides parallel to the length of the parking space and its lower corner at, or lower side aligned with, the end of the parking space length. (CA T24 11B-502.6.4.2) CARM page 159</p> <p>The words NO PARKING shall be painted on the surface each access aisle. (CA T24 11B-502.3.3) CARM page 166</p> <p>This notice shall be painted in white letters a minimum of 12 inches in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3) CARM page 166</p>

Facility Element/Finding	Corrective Action
	<p>Access aisles shall be marked with a blue painted borderline around their perimeter. (CA T24 11B-502.3.3) (ADA 502.3.3) CARM page 164</p> <p>The area within the blue borderlines shall be marked with hatched lines a maximum of 36 inches on center in a color contrasting with that of the aisle surface, preferably blue or white. (CA T24 11B-502.3.3) CARM page 164</p>
<p><u>Disabled Parking</u></p> <p>One ADA parking sign is not visible due to a fence blocking the sign.</p>	<p>Parking spaces, access aisles and vehicular routes serving them shall provide a vertical clearance of 98 inches minimum. (CA T24 11B-502.5) (ADA 502.5) CARM page 162</p>
<p><u>Disabled Parking</u></p> <p>ADA parking sign missing second sign.</p>	<p>Additional language or an additional sign below the Symbol shall state: Minimum Fine \$250. (CA T24 11B-502.6.2) CARM page 158</p>
<p><u>Disabled Parking</u></p> <p>One Access Ramp protrudes into the parking floor from the sidewalk.</p>	<p>Access aisles for van parking spaces shall be located on the passenger side of the parking spaces. (CA T24 11B-502.3.4) (ADA 502.3.4) CARM page 167</p> <p>Access aisles shall not overlap the vehicular way. (CA T24 11B-502.3.4) (ADA 502.3.4) CARM page 167</p> <p>Curb ramps and the flared sides of curb ramps shall be located so that they do not project into vehicular traffic lanes, parking spaces or parking access aisles. (CA T24 11B-406.5.1) (ADA 406.5) CARM page 193</p>
<p><u>Disabled Parking</u></p> <p>A disabled wheelchair client must travel into the traffic path behind one vehicle space to get into the front entry.</p>	<p>Parking spaces and access aisles shall be designed so that persons using them are not required to travel behind parking spaces other than to pass behind the parking space in which they parked. (CA T24 11B-502.7.1) CARM page 162</p>

Facility Element/Finding	Corrective Action
<p><u>Disabled Parking</u></p> <p>No access aisle available from ADA parking space to front entrance.</p>	<p>Access aisles shall adjoin an accessible route. (CA T24 11B-502.3) (ADA 502.3) CARM page 164</p>

a. **Corrective Actions:** Refer to Corrective Action column above (Section A, 1).

b. **Recommendations:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 1).

4. Facility Location: 10 Cherry Court, Ukiah, CA

Facility Element/Finding	Corrective Action
<p><u>Unisex Restrooms</u></p> <p>Two restrooms are present at location but no ADA restrooms are available.</p> <p>Restrooms do not have adequate turning space.</p>	<p>Men's toilet and bathing facilities shall be identified by an equilateral triangle, ¼ inches thick with edges 12 inches long and a vertex pointing upward. (CA T24 11B-703.7.2.6.1) CARM page 376</p> <p>The triangle symbol shall contrast with the door, either light on a dark background or dark on a light background. (CA T24 11B-703.7.2.6.1) CARM page 376</p> <p>The triangle symbol shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol. (CA T24 11B-703.7.2.6) CARM page 376</p> <p>Where a door is provided the triangle symbol shall be mounted within 1 inches of the vertical centerline of the door. (CA T24 11B-703.7.2.6) CARM page 376</p> <p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. (CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 477</p>

Facility Element/Finding	Corrective Action
	<p>Clearance around a water closet shall be 60 inches minimum measured perpendicular from the side wall and 56 inches minimum measured perpendicular from the rear wall. (CA T24 11B-604.3.1) (ADA 604.3.1) CARM page 401</p> <p>A minimum 60 inches wide and 48 inches deep maneuvering space shall be provided in front of the water closet. (CA T24 11B-604.3.1) (ADA 604.3.1) CARM page 401</p>

- a. **Corrective Actions:** Refer to Corrective Action column above (Section A, 1).
- b. **Recommendations:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 1).

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 it 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 (TDDs), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, counties must ensure that written materials be available in individuals' primary languages if the forms and materials are provided by

CDSS in that language, 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: (Please answer yes/no and provide response with comments)	Comments
Does the County identify a client's language need upon first contact? How?	Yes, the County identifies the client's language requirements on first contact by asking the client about language preference during the first interview.
Does the County use a primary language form?	Yes, a primary language form is used.
Does the client self-declare on this form?	Yes, clients are able to self-declare.
Are non-English- or limited- English-speaking clients provided bilingual services?	Yes, non-English- or limited- English-speaking clients are provided bilingual services.
After it has been determined that the client is limited-English or non-English speaking, is there a County process for procuring an interpreter?	Yes, the County utilizes interpretive services when needed by either using in-house or telephonic interpretive services.
Does the County have a contracted language line provider, a county interpreter list, or any other interpreter process?	Yes, the County has a contracted language line provider and a County interpreter list.
Is there a delay in providing interpretive services?	No, there is no delay. Interpretive services are provided quickly and efficiently in a reasonable amount of time.
Are County interpreters certified?	Yes, County interpreters are certified.
Does the County have adequate interpreter services?	Yes, the County has adequate interpreter services.
Does the County allow minors to be interpreters? If so, under what circumstances?	No, the County does not allow minors under the age of 18 to be interpreters.
Does the County allow the client to provide his or her own interpreter?	Under certain circumstances a client can bring their own interpreter, but they are advised about possible misinformation of services.

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County ensure that the client-provided interpreter understands what is being interpreted for the client?	Yes, a client can bring their own interpreter, and County staff advises clients about possible misinformation about services. The County does not undertake any other action to ensure interpreter understanding.
If there is not a Release of Confidentiality Information form, how and where is the client-provided interpreter documented?	Yes, during interviews a Release of Confidentiality Information form is given to the client and explained verbally to the client.
Does the County use the CDSS-translated forms in the clients' primary languages?	Yes, the County is aware and does use the CDSS-translated forms in the clients' primary languages. They are aware of where to find them.
Is the information that is to be inserted into NOA translated into the client's primary language?	Yes, information inserted into the NOA is translated into the client's primary language and inserted into documents. The County sends out NOA's in the client's primary language also.
If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language?	Yes, when there is no available translated language, staff will work to have the information translated by a qualified translator and incorporate the translated language into the provided documents. The information on the form is also explained to the client.
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, or large print materials (besides the PUB 13)?	Yes, the County is aware of auxiliary services and receptionists at all offices are aware of where to obtain these services to assist persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, and/or large print materials.
Does the County identify a client with a disability (physical, mental, or learning)?	Yes, at intake the County utilizes an intake form that assists to identify a client's physical, mental, or learning needs.
Does the County assist clients with self-identifying a disability?	Yes, at intake staff asks the client if there are any reasonable accommodations the client may need.

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?	Yes, the County has a policy for assisting clients with a disability (physical, mental, or learning).
Does the County offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	Yes, at intake staff asks the client if there are any reasonable accommodations the client may need.
Does the County identify and assist the client who has learning disabilities or a client who cannot read or write?	Yes, when a client has difficulty understanding or completing documents, staff explains documents verbally and the assists the client complete the paperwork.
Does the County offer a screening for learning disabilities?	Yes, the County has screening for learning disabilities.
Is there an established process for offering a screening?	Yes, the County has an established process for offering screening.
Is the client identified as having a learning disability referred for an evaluation?	Yes, clients identified as having a learning disability are referred for an evaluation.

i. **Corrective Action:** None.

ii. **Recommendation:** None.

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

CalFresh

Item	How item is Documented
Ethnic Origin	Identified at client intake. Documented in case file.
Method of identifying client's primary language	Identified at client intake. Documented in case file.

Item	How item is Documented
Method of documenting client's primary language	Identified at client intake. Documented in case file.
Method of providing bilingual services and documentation	Identified at client intake. The client will be assigned to a bilingual worker and this is documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.
Method to inform client of potential problem using own interpreter	The client is advised verbally of potential problems using their own interpreter and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and the form is explained to the client. This is documented in the case file.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstances are documented in the case file.
Method of identifying client's disability	The client self identifies any disabilities by using a reasonable accommodation form and this is documented in the case file. The client is personally assisted by the worker, if needed, to complete the form.

Item	How item is Documented
Method of documenting client's disability (physical, mental, or learning)	When the client self identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When the client self identifies any disability, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self identifies any disability, it is documented in the case file and at every client interview the reasonable accommodation is acknowledged.

Adult Programs (IHSS/APS)

Item	How item is Documented
Ethnic Origin	Identified at client intake. Documented in case file.
Method of identifying client's primary language	Identified at client intake. Documented in case file.
Method of documenting client's primary language	Identified at client intake. Documented in case file.
Method of providing bilingual services and documentation	Identified at client intake. The client will be assigned to a bilingual worker and this is documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.
Method to inform client of potential problem using own interpreter	The client is advised verbally of potential problems using their own interpreter and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and the form is explained to the client. This is documented in the case file.

Item	How item is Documented
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, the circumstances are documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstances are documented in the case file.
Method of identifying client's disability	The client self identifies any disabilities by using a reasonable accommodation form and this is documented in the case file. The client is personally assisted by the worker, if needed, to complete the form.
Method of documenting client's disability (physical, mental, or learning)	When the client self identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self identifies any disability, it is documented in the case file and at every client interview the reasonable accommodation is acknowledged.

CalWORKs & Employment Services

Item	How item is Documented
Ethnic Origin	Identified at client intake. Documented in case file.

Item	How item is Documented
Method of identifying client's primary language	Identified at client intake. Documented in case file.
Method of documenting client's primary language	Identified at client intake. Documented in case file.
Method of providing bilingual services and documentation	Identified at client intake. The client will be assigned to a bilingual worker and this is documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.
Method to inform client of potential problem using own interpreter	The client is advised verbally of potential problems using their own interpreter and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and is explained to the client. This is documented in the case file.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, the circumstances are documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstance for using a minor is documented in the case file.
Method of identifying client's disability	The client self identifies any disabilities by using a reasonable accommodation form and this is documented in the case file. The

Item	How item is Documented
	client is personally assisted by the worker, if needed, to complete the form.
Method of documenting client's disability (physical, mental, or learning)	When the client self identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self identifies any disability, it is documented in the case file and at every client interview the reasonable accommodation is acknowledged.

CAPI Program

Item	How item is Documented
Ethnic Origin	Identified at client intake. Documented in case file.
Method of identifying client's primary language	Identified at client intake. Documented in case file
Method of documenting client's primary language	Identified at client intake. Documented in case file.
Method of providing bilingual services and documentation	Identified at client intake. The client will be assigned to a bilingual worker and this is documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.
Method to inform client of potential problem using own interpreter	The client is advised verbally of potential problems using their own interpreter and the conversation is documented in the case file.

Item	How item is Documented
Release of information to interpreter	The client is given the release of information form and the form is explained to the client. This is documented in the case file.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstances are documented in the case file.
Method of identifying client's disability	The client self identifies any disabilities by using a reasonable accommodation form and this is documented in the case file. The client is personally assisted by the worker, if needed, to complete the form.
Method of documenting client's disability (physical, mental, or learning)	When the client self identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self identifies any disability, it is documented in the case file and at every client interview the reasonable accommodation is acknowledged.

Fraud

Item	How item is Documented
Ethnic Origin	Identified at client intake by originating worker. Documented in case file.
Method of identifying client's primary language	Identified at client intake by originating worker. Documented in case file.
Method of documenting client's primary language	Identified at client intake by originating worker. Documented in case file.
Method of providing bilingual services and documentation	Identified at client intake. The client will be assigned to a bilingual worker and this is documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.
Method to inform client of potential problem using own interpreter	The client is advised verbally of potential problems using their own interpreter and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and the form is explained to the client. This is documented in the case file.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client

Item	How item is Documented
	insists, the circumstances are documented in the case file.
Method of identifying client's disability	The client self identifies any disabilities by using a reasonable accommodation form and this is documented in the case file. The client is personally assisted by the worker, if needed, to complete the form.
Method of documenting client's disability (physical, mental, or learning)	When the client self identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self identifies any disability, it is documented in the case file and at every client interview the reasonable accommodation is acknowledged.

Children's Services

Item	How item is Documented
Ethnic Origin	Identified at client intake. Documented in case file.
Method of identifying client's primary language	Identified at client intake. Documented in case file.
Method of documenting client's primary language	Identified at client intake. Documented in case file.
Method of providing bilingual services and documentation	Identified at client intake. The client will be assigned to a bilingual worker and this is documented in the case file.

Item	How item is Documented
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.
Method to inform client of potential problem using own interpreter	The client is advised verbally of potential problems using their own interpreter and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and the form is explained to the client. This is documented in the case file.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstances are documented in the case file.
Method of identifying client's disability	The client self identifies any disabilities by using a reasonable accommodation form and this is documented in the case file. The client is personally assisted by the worker, if needed, to complete the form.
Method of documenting client's disability (physical, mental, or learning)	When the client self identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, it is documented in the case file.

Item	How item is Documented
Method of documenting client's reasonable accommodation	When the client self identifies any disability, it is documented in the case file and at every client interview the reasonable accommodation is acknowledged.

B. Corrective Action: None

C. Recommendation: None

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights, cultural awareness, Section 504 of the Rehabilitation Act of 1973 (Section 504), and ADA 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: (Please answer yes/no and provide response with comments)	Comments
Are employees trained in the requirement of Section 504 and ADA?	Yes, employees are trained on Section 504 and ADA requirements.
Do employees receive continued Division 21 Training?	Yes, Division 21 Training is accomplished annually.
Do employees understand the County policy regarding a client's rights and procedure to follow when receiving a discrimination complaint?	Yes, employees understand the County policy regarding a client's rights and procedure to follow when receiving a discrimination complaint.
Does the County provide employees Cultural Awareness Training?	Yes, employees receive Cultural Awareness Training during the annual training.
Do the CSW's have an understanding of Multi-Ethnic Placement Act (MEPA)?	Yes, during the annual training employees receive MEPA training.

Interview Questions: (Please answer yes/no and provide response with comments)	Comments
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	Yes, in Mendocino County the employees seem knowledgeable about the predominant cultural groups receiving services in their area.
Does the County provide training on how to identify clients with disabilities (physical, mental & learning)?	Yes, training on how to identify clients with disabilities (physical, mental & learning) is completed during the annual training.
Do employees receive training on reasonable accommodations for clients with disabilities?	Yes, employees receive training on the County policy regarding clients with disabilities during the annual training.
Do the employees understand the County policy regarding a client's right to a reasonable accommodation?	Yes, employees receive training on the County policy regarding a client's right to a reasonable accommodation during the annual training.

B. Corrective Actions: None.

C. Recommendation: None.

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's responsibility to maintain this log.

A. Findings from Staff Interviews, Civil Rights Coordinator, and Program Manager Surveys

Interview and Review Areas: (Please answer yes/no and provide response with comments)	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	Yes, utilizing the worker questionnaire, it was summarized that employees can easily identify the difference between a program, discrimination, and personnel complaint.

Interview and Review Areas: (Please answer yes/no and provide response with comments)	Findings
Do the employees know who the Civil Rights Coordinator is?	Yes, everyone asked in the County review was able to identify the Civil Rights Coordinator. It is visibly posted in the Lobby of each building.
Do the employees know the location of the Civil Rights poster "Everyone is Equal... (PUB 86)" with information as to how and where the clients can file a discrimination complaint?	Yes, employees asked the location of the Civil Rights poster "Everyone is Equal... (PUB 86)" with information as to how and where the clients can file a discrimination complaint. All staff knew where to find it.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	Yes, the Civil Rights Coordinator keeps the complaint log complete and up to date.

B. Corrective Actions: None.

C. Recommendation: None.

IX. VENDOR CONTRACTS

Counties are required to ensure contracted services with contractors, vendors, consultants, and other providers of service, who receive state or federal assistance, include the assurance of compliance agreement.

A. Contracts Review

Number of Contracts Reviewed	10
Number of Contracts with an Assurance of Compliance Agreement	10

B. Corrective Action: None

X. CALL CENTER EVALUATION

County Call/Service Centers are evaluated to ensure services provided are nondiscriminatory toward non-English speaking clients and clients with a disability (physical, mental, or learning).

A. Findings from Call/Service Center site visit and interviews

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County have a Call Center/Service Center?	Mendocino County does not have a Call Center. Although there are currently no statutory requirements for call centers, the County maintains avenues in which to meet the demands of applicants, recipients, and clients.

B. Corrective Action: None.

C. Recommendation: None.

XI. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups. The following summarizes their observations and identifies issues that the County management team can address to improve their operations from a civil rights perspective.

A. Major Observations

CASA of Lake & Mendocino County was contacted by telephone and had no input on services. CASA felt that Mendocino County was providing good services.

XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Mendocino County Department of Social Services Civil Rights Compliance Plan for the period December 1, 2018 through November 31, 2019, was received on November 15, 2018. It is approved as submitted.

XIII. CONCLUSION

The CDSS Reviewer found the Mendocino County Department of Social Services staff warm, welcoming, informative and very supportive. Particular thanks to Bekkie Emery, Civil Rights Coordinator, for organizing the details of the review, and 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 Mendocino County Department of Social Services in substantial (partial, or not in compliance, satisfactory, full) 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 Mendocino County Department of Social Services must remedy the deficiencies identified in this report by taking corrective actions. A CAP 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 CDSS' intent that this report be used to create a positive interaction between the County and CDSS to identify and correct compliance violations and to provide the County with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights Unit staff is available to provide technical assistance as requested.