



CDSS

WILL LIGHTBOURNE  
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



EDMUND G. BROWN JR.  
GOVERNOR

November 7, 2013

Elliot Robinson, Director  
Monterey County  
Department of Social and Employment Services  
1000 So. Main Street, Ste. 209-A  
Salinas, CA 93901

Dear Mr. Robinson,

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office, Ms. Tiffany Marsh during the course of the Civil Rights Compliance Review of July 22-26, 2013. 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 ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at [crb@dss.ca.gov](mailto: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 website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>

If you need technical assistance in the development of your CAP, please feel free to contact Ms. Tiffany Marsh at (916) 654-2107. You may also contact us by e-mail at address given above.

Sincerely,

***Original signed by Civil Rights Bureau Chief***

JIM TASHIMA, Chief  
Civil Rights Bureau  
Human Rights and Community Services Division

Enclosure

c: Cheryl Pirozzoli, Civil Rights Coordinator

Mike Papin, Chief  
CalFresh Policy Bureau

Marlene Fleming, Chief  
Field Operations Bureau

Brian Tam, Chief  
CalFresh Management Operations Section

Paul Gardes  
CalFresh Policy Bureau

Thuan Nguyen  
Refugee Programs Bureau

Joe Torres, 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

Jodie Berger, Regional Counsel  
Legal Services of Northern California

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR  
Monterey County  
Department of Social And Employment Services**

**Conducted on  
July 22-25, 2013**

**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**

**Tiffany Marsh**

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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 is to assess the Monterey County Department of Social and Employment 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 July 22-24, 2013. An exit interview was held to review the preliminary findings.

The review was conducted in the following locations:

<b>Name of Facility</b>	<b>Address</b>	<b>Programs</b>	<b>Non-English languages spoken by a substantial number of clients (5% or more)</b>
Seaside District Office	1281 Broadway Ave. Seaside	CalWORKs, Family & Children Services	Spanish
Seaside One Stop Career Center	1760 Fremont D-2 Seaside	CalWORKs Employment Services	Spanish
King City District Office	116-118 Broadway Ave. King City	CalWORKs, Family & Children Services, IHSS, Adult Services	Spanish
King City One Stop Career Center	200-A Broadway, Ste. 62 King City	CalWORKs Employment Services	Spanish

## II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2012-2013 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.
- Contacted local county advocate groups for comments or concerns regarding the civil rights of applicants/recipients receiving services offered by county programs.

Alliance on Aging, Inc.  
247 Monterey Street  
Salinas, CA 93901

California Rural Legal Assistance  
3 Williams Road  
Salinas, CA 93905

Central Coast Center for  
Independent Living  
318 Cayuga Street, Suite 208  
Salinas, CA 93901

Legal Services for Seniors  
21 W. Laurel Drive, Suite 83  
Salinas, CA 93906

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections
- State Hearings room inspection

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

<b>Classifications</b>	<b>Total</b>	<b>Bilingual</b>
Eligibility Workers	3	2
Children Social Workers	3	2
Adult Program Workers	1	1
Receptionist/Screeners	3	2
Employment & Training Workers	5	3
<b>Total</b>	<b>15</b>	<b>10</b>

Program Manager Surveys

Number of surveys distributed	Unknown
Number of surveys received	2

Reviewed Case Files

English speakers' case files reviewed	9
Non-English or limited-English speakers' case files reviewed	69
Languages of clients' cases	ASL, Japanese, Spanish, Tagalog, Triqui-Bajo, Vietnamese

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 summarizes findings from discussions with community organizations, including advocate groups.

Section X 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 XI 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**

<b>Access to Services, Information and Outreach</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Staff will accommodate clients by scheduling a home visit appointment and/or conducting an over-the-phone interview.
Does the county have extended hours to accommodate clients?		X		Office hours are 8:00 am – 5:00 pm
Can applicants access services when they cannot go to the office?	X			Clients may apply/recertify for benefits by mail, phone or online at C4yourself.com.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Community partners are provided updated information of services available to individuals in the remote areas.



<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)?	X			Pub 13 (06/11) is provided at intake, re-certification and available in the lobbies.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			Pub 13 is explained to ensure clients are aware and understand his/her Rights and Responsibilities.
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?	X			
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?	X			
Was the Pub 13 available in large print, audio CD and Braille?	X			Available at the receptionist desk.
Were the current versions of the required posters present in the lobbies?	X			Pub 86 (03/07) AD 475B (12/99)
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?			X	5 of 15 staff interviewed were unable to give the location of the poster. All staff have information readily available to provide clients upon request.

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			Each instructional and directional signage posted in threshold language.

**B. Corrective Actions – None**

**C. Recommendation – None**

The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

Pub 13	“Your Rights under California Welfare Programs”	06/11
Pub 86	“Everyone is Different, but Equal Under the Law”	03/07
Form AD 475B	“And Justice for All”	12/99

Contact the Civil Rights Bureau to receive the most recent versions, or download the Pub 13 from the CRB website <http://www.cdss.ca.gov/civilrights/entres/forms/English/pub13.pdf>.

**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: 1281 Broadway Ave., Seaside**

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Parking	No "Unauthorized Parking..." signage displayed at the entrances to the off-street parking.	<p>An additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space.</p> <p>The sign shall be 17" by 22" min. in size with lettering 1" min. high, stating:</p> <p>"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 _____."</p> <p>Blank spaces are to be filled in with appropriate information as a permanent part of the sign. (CA T24 1129B.4) p 134</p>

	<p>Three accessible parking stalls do not have required signs to identify the space as accessible.</p> <p>Van accessible parking signage measured low at 69 ½”.</p> <p>No signage of “Minimum Fine \$250” displayed below the sign of van accessible parking.</p> <p>Three accessible parking spaces measured less than 9’ wide at 8’9”, 8’3”, and 8’8”.</p> <p>Two accessible parking spaces on left side do not have access aisles.</p> <p>Van accessible access aisle measured less than 8’ wide at 5’2”.</p>	<p>Each parking space for persons with disabilities shall be identified by a reflectorized sign permanently posted adjacent to and visible from each stall or space, consisting of the International Symbol of Accessibility in white on dark blue background. (CA T24 1129B.4) (ADA 4.6.4) p 134</p> <p>When in a path of travel, shall be posted at a height of 80” min. from the bottom of the sign to the finished grade. (CA T24 1129B.4)(ADA 4.6.4) p. 134</p> <p>An additional sign or additional language below the symbol sign of accessibility shall state “Minimum Fine \$250” (CA T24 1129B.4) p 134</p> <p>Parking space dimensions: 9’ wide by 18’ long. (CA T24 1129B.3.1 &amp; 2) ADA 4.6.3) p 136</p> <p>Access aisles should be located on the passenger side of a space, and should be a min. of 18’ long by 5’ wide or aisles, serving car accessible space.</p> <p>Access aisle dimensions 8’ wide by 18’ long, located on the passenger side. (CA T24 1129B.3.1 &amp; 2)(ADA 4.6.3) p. 138</p>
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	Access aisles do not display the necessary words "NO PARKING" painted on the pavement.	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.3.1) p. 136
Restroom	<p>Men: Door signage measured centered at 63" high.</p> <p>Women: Door signage measured centered high at 62" and wall signage measured centered low at 59".</p> <p>Force to open door is excessive at 9 lbs.</p>	<p>Door sign and wall sign shall be 60" above the floor to the center of sign.</p> <p>For permanent identification, the sign shall be installed in 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. 287</p> <p>Interior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5)(ADA 4.13.11(2)(B))</p>

**a. Recommendation – None**

**2. Facility Location:** 1760 Fremont D-2, Seaside

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Parking	No signage of "Minimum Fine \$250" displayed below the sign of accessible parking.	An additional sign or additional language below the symbol sign of accessibility shall state "Minimum Fine \$250" (CA T24 1129B.4) p 134
	Access aisles do not	The words "NO PARKING"

	display the necessary words "NO PARKING" painted on the pavement.  Ramp slope in path of entrance on right side is too steep at 14%.	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.3.1) p. 136  The max. slope of a ramp shall be 1:12 (8.3%). (CA T24 1133B.5.3)(ADA 4.8.2) p. 148
Exterior entrance	Force to open door is excessive at 12 lbs.	Exterior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5)(ADA 4.13.11(2)(A)) p. 207
Restroom	Men/Women: Wall signage not displayed adjacent to the door latch.	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. 287

**a. Recommendation – None**

**3. Facility Location:** 116-118 Broadway Ave., King City

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Parking	Parking spaces overlap with paint, not clearly depicting designated accessible parking.	The surface of each accessible parking stall or space must have a surface identification duplicating either of the following schemes: <ul style="list-style-type: none"> <li>• (a) By outlining or painting the stall or space in blue and</li> </ul>

	No designated van accessible parking.	<p>outlining on the ground in the stall or space in white or suitable contrasting color a profile view depicting a wheelchair with occupant; <b>OR</b></p> <ul style="list-style-type: none"> <li>• (b) By outlining a profile view of a wheelchair with occupant in white on blue background.</li> </ul> <p>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 1129.B.4.1 &amp; 2) pg. 134</p> <p>One in every 8 accessible spaces must be van accessible, but no less than 1 must be provided. (CA T24 1129B.3.1) p 138</p>
Exterior entrance	Force to open door is excessive at 10 lbs.	Exterior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5)(ADA 4.13.11(2)(A)) p. 207
Client lobby	Small table located in lobby, knee space too low at 24".	Minimum seating knee space is 27" high, 30" wide and 19" deep. (CA T24 1122B.3)(ADA 4.32.3) p.394
Restroom	Men: Door signage measured centered at 63" high.	Door sign and wall sign shall be 60" above the floor to the center-line of sign. (CA T24 1117B.5.7)(ADA 4.30.6) p. 287

	Force to open door is excessive at 7 lbs.	Interior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5)(ADA 4.13.11(2)(B))
	Pipe under sink is not securely wrapped.	Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.4.3.4)(ADA 4.19.4) p. 296
	Women: Door signage measured centered at 64" high.	Door sign and wall sign shall be 60" above the floor to the center-line of sign. (CA T24 1117B.5.7)(ADA 4.30.6) p. 287
	Pipe under sink is not securely wrapped.	Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.4.3.4)(ADA 4.19.4) p. 296

**a. Recommendation – None**

**4. Facility Location:** 200 Broadway Ave., Suite. 62, King City

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Exterior entrance	Force to open door is excessive at 7 lbs.	Exterior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5)(ADA 4.13.11(2)(A))

**a. Recommendation – None**



## **V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

### **A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews**

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county identify a client's language need upon first contact? How?	X			Clients self-identify language on "I Speak" card. Staff may contact the Language Service line for assistance.
Does the county use a primary language form?		X		Language Preference and Auxiliary Aid Identification form (CO-590) is available. This form is not standard practice for documentation.
Does the client self-declare on this form?	X			Client self-declares primary language on SAWS 1

Question	Yes	No	Some-times	Comments
				application.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			Assigned bilingual staff or contracted interpretive services are used at each point of contact.
Is there a delay in providing services?		X		Interpretive services are provided at the time of or scheduled prior to providing services. The county has access to Language Line Services to provide interpretive services same day.
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			County has access to many organizations, volunteer groups and other government agencies that will assist with providing interpretive services within 24-48 hours.
Are county interpreters determined to be competent?	X			County qualified bilingual staff are certified by the Merit System Services and State Certified Court Interpreter.
Does the county have adequate interpreter services?	X			Translation Unit, Language line, CA Relay Services, and TDD/TTY
Does the county allow minors to be interpreters? If so, under what circumstances?		X		

Question	Yes	No	Some-times	Comments
Does the county allow the client to provide his or her own interpreter?	X			Client-provided interpreter must sign Language Interpretation Notice of Understanding form (CO-591).
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			
Does the county use the CDSS-translated forms in the clients' primary languages?	X			Clients receive information and forms in their preferred language as indicated on form.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			
Does the county offer screening for learning	X			Screening for learning disability offered in the CalWORKs

Question	Yes	No	Some-times	Comments
disabilities?				program at intake and recertification/assessment interview.
Is there an established process for offering screening?	X			
Is the client identified as having a learning disability referred for evaluation?	X			Clients are referred for assessment/evaluation with the option to waive services.

**B. Corrective Actions – None**

**C. 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**

Documented Item	Children's Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services
Ethnic origin documentation	CWS/CMS Demographic Summary	AACTS, SOC. 293	C-IV, SAWS 1, SOF
Primary language documentation	CWS/CMS Demographic Summary	AACTS, SOC. 293	C-IV, SAWS 1, SOF
Method of providing bilingual services and	Case Narrative (Inconsistent)	Case Narrative (Inconsistent)	Case Comments (Inconsistent)

<b>Documented Item</b>	<b>Children's Services</b>	<b>Adult Programs (IHSS &amp; APS)</b>	<b>CalWORKs &amp; Employment Services</b>
documentation	documentation)	documentation)	documentation)
Client provided own interpreter	None found in case sample	Case Narrative	Case Comments
Method to inform client of potential problem using own interpreter	None found in case sample narrative	None found in case sample narrative	None found in case sample comments
Release of information to Interpreter	None found in case sample files	None found in case sample file/narrative	None found in case sample
Individual's acceptance or refusal of written material offered in primary language	Case Narrative	Case File/Narrative	Case Comments
Documentation of minor used as interpreter	None found in case sample narrative	None found in case sample narrative	None found in case sample comments
Documentation of circumstances for using minor interpreter temporarily	None found in case sample narrative	None found in case sample narrative	None found in case sample comments
Translated notice of actions (NOA) contain translated inserts	Case File	Case File/Narrative	Case Comments
Method of identifying client's disability	CWS/CMS Demographic Summary	Case File, Intake/Annual Review Form	Case Comments, Demographic Summary
Method of documenting a client's request for auxiliary aids and services	None found in case sample narrative	Case Narrative	Case Comments

## A. Corrective Actions

Areas of Action	Corrective Action
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22
General	<del>4.</del> Monterey County must ensure that proper documentation is kept in the file that identifies all the required elements <del>the following to ensure compliance with Division 21 Regulations (Div.21-21-116):</del> <del>[Erika: I think these CAs should reflect the categories above.]</del> <u>to ensure compliance.</u> <u>Div. 21-116</u>

## B. Recommendation – 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	Some-times	Comments
Do employees receive continued Division 21 Training?	X			County schedules mandatory Civil Rights and Cultural Awareness trainings on a bi-annual bases.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural Awareness Training?	X			Included in the New Employee Orientation training.
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

### 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 responsibility to maintain this log.

### **A. Findings from Staff Interviews and Program Manager Surveys**

<b>Interview and review areas</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Findings</b>
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?			X	4 of 15 staff interviewed could not clearly distinguish the difference between the three types of discrimination complaints.
Did the employees know who the Civil Rights Coordinator is?	X			
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?			X	Not all staff interviewed could give the location of the Civil Rights poster. Staff does have the information readily available to provide clients upon request.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

### **B. Corrective Action**

<b>Element</b>	<b>Corrective Action</b>
Discrimination Process	Monterey County shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203



### **C. Recommendation – None**

## **IX. 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 will provide issues that the county management team can address to improve their operations from a civil rights perspective.

### **A. Major observation include:**

1. Legal Services for Seniors (LSS) responded with no complaints, problems, or concerns. LSS stated their experience with Monterey County employees has been professional; staff is aware of the laws and adhere to them
2. There were no other responses to report.

## **X. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL**

The Monterey County Department of Social and Employment Services Civil Rights Compliance Plan for the period May 1, 2013 through April 30, 2014, received on May 1, 2013. It is approved as submitted.

## **XI. CONCLUSION**

The CDSS reviewer found the Monterey County Department of Social and Employment Services staff warm, welcoming, informative and very supportive. Particular thanks to Cheryl Pirozzoli, Civil Rights Coordinator, for organizing the details of the review, and to Kim Petty, Facilities Manager, 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 Monterey County Department of Social and Employment Services in substantial 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 Monterey County Department of Social and Employment Services must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and

the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.