



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](http://www.cdss.ca.gov)



ARNOLD SCHWARZENEGGER  
GOVERNOR

June 17, 2010

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

Dear Ms. Tiede:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of November 17-19, 2009. Enclosed is the final report on the review. We apologize for the delay.

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 sixty 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 attached report.

We will provide a copy of our 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. Per the Governor's Executive Order S-08-09, all compliance reviews (and corresponding CAPs) performed after January 2008 will be posted on the state's Reporting Government Transparency website.

If you need technical assistance in the development of your CAP, please feel free to contact the Civil Rights Bureau at (916) 654-2107. You may also contact us by e-mail at [crb@dss.ca.gov](mailto:crb@dss.ca.gov).

Sincerely,

RAMÓN S. LOPEZ, Chief  
Civil Rights Bureau  
Human Rights and Community Services Division

Enclosure

c: Ms. Jan Priddy, Civil Rights Coordinator

Chris Webb-Curtis, Branch Chief, CDSS Supplemental Nutrition Assistance Program,  
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

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 Right  
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

**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**

## TABLE OF CONTENTS

- I. INTRODUCTION**
- II. SUMMARY OF METHODOLOGY**
- III. DISSEMINATION OF INFORMATION**
- IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**
- V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**
- VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**
- VII. STAFF DEVELOPMENT AND TRAINING**
- VIII. CONCLUSION**

## 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:

<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>
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

<b>Access to Services, Information and Outreach</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
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.

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
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.

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</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		Instructional and directions signs were 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

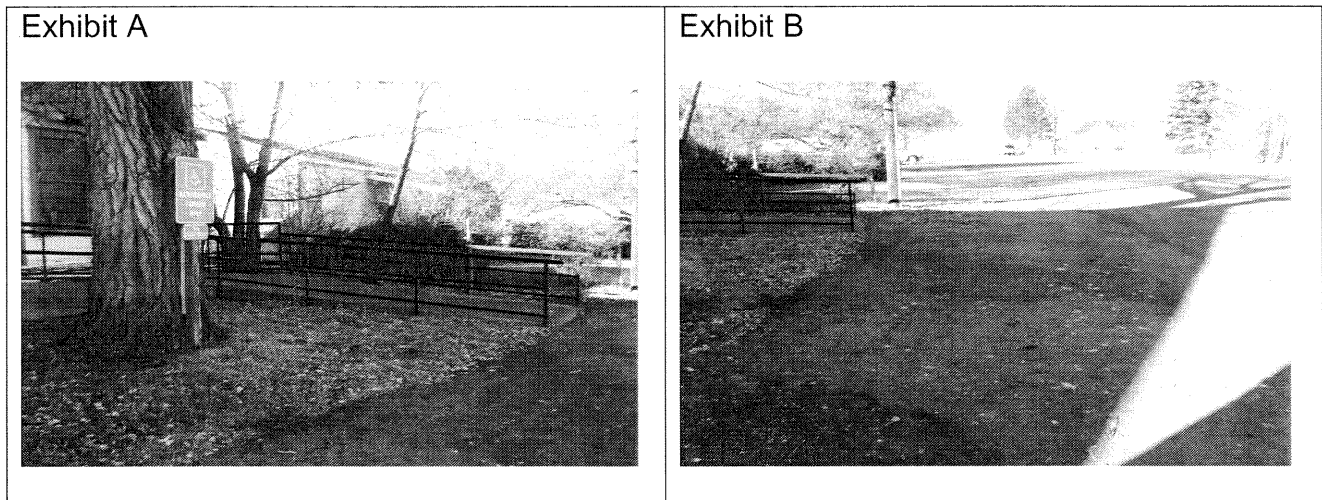
<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Parking	There was no "Unauthorized Parking" sign at entrance to off-street accessible parking.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min.



	<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>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>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"> <li>(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</li> <li>(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 &amp; 2) p 133</li> </ul> <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>There is no access aisle for the van-accessible parking available.</p> <p>The words "No Parking" are not painted in access aisle, as there is no access aisle (see Exhibit B below).</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> <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 &amp; 2) p 135</p>
Main Entrance	<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) &amp; (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
Parking	<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 &amp; 2) p 135</p>

	<p><b>Underground Parking:</b> There is no van-accessible parking space.</p> <p>There is no appropriate freestanding or wall mounted ISA sign (see Exhibit D below).</p> <p>The words "No Parking" are not painted in access aisles (see Exhibit E below).</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>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>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</p> <p>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>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 &amp; 2) p 135</p>
<p>Route to Main Entrance</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</p>

		T24 1117B.5.1) pp 186, 394
Elevator	<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>
Main Entrance	<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) &amp; (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>
Men's Restroom	<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 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>Door pressure excessive at 20 lbs.</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>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) &amp; (b)) p 195</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>
Women's Restroom	<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 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>Door pressure excessive at 15 lbs.</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>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p 195</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>
--	--	--

## B. Recommendation

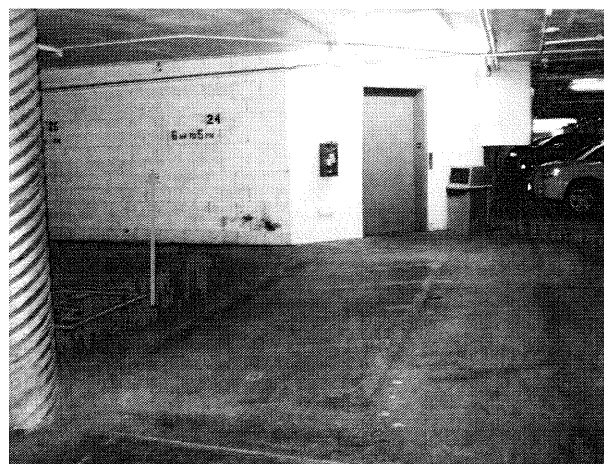
There is no signage indicating where the men's restroom is located. It is recommended that a directional sign be posted on the wall designating the men's restroom is at the end of the hall to the right past the women's restroom.

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.

Exhibit C



Exhibit D



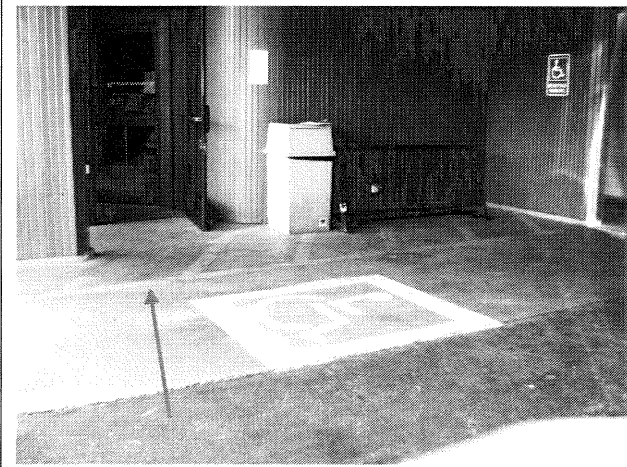


Exhibit E

Exhibit F







Exhibit G 1

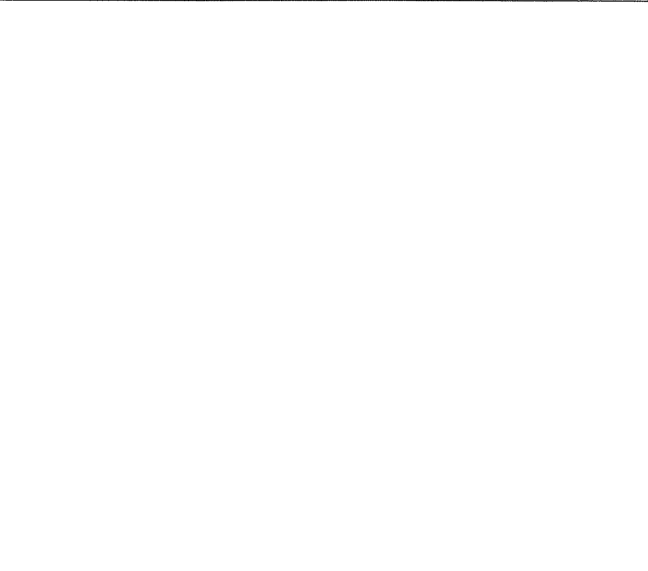


Exhibit H

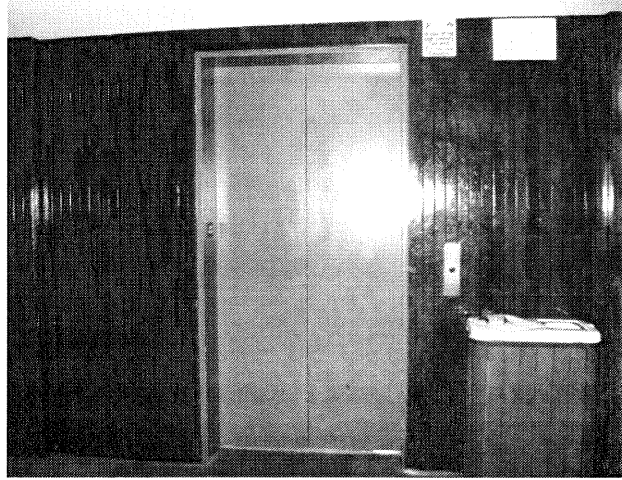


Exhibit G 2

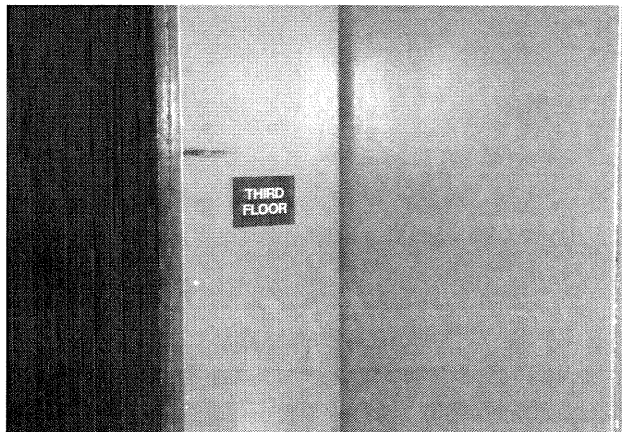


Exhibit I



Exhibit J

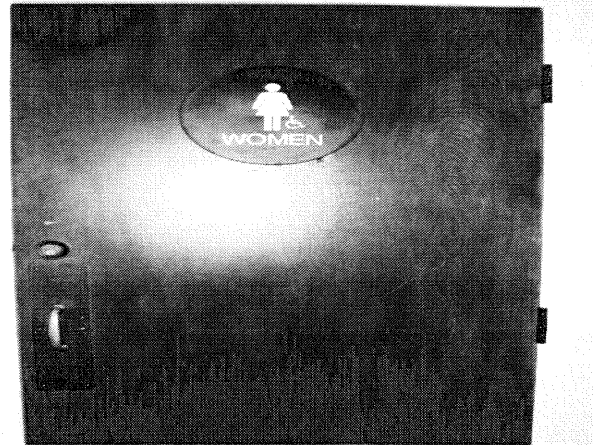
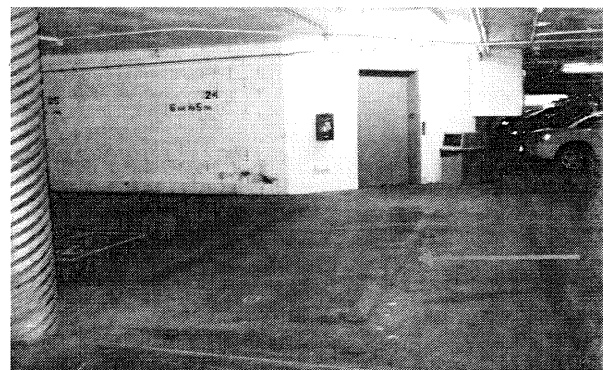
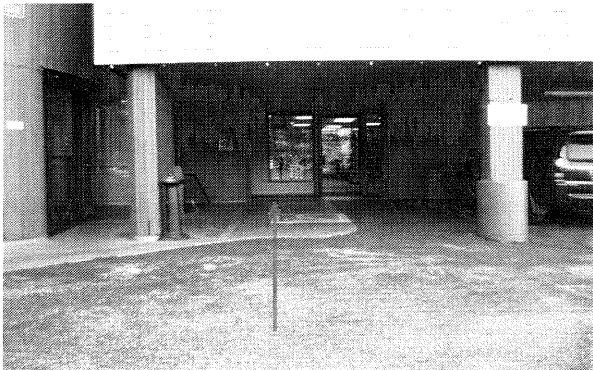


Exhibit K



## **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.

Question	Yes	No	Comments
Does the county have adequate interpreter services?		X	There are no bilingual staff for IHSS and Children's Services.
Does the county use the CDSS-translated forms in the clients' primary languages?	X		The Forms Coordinator keeps track of all translated forms and materials and all staff have access to forms available online.
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

<b>Documented Item</b>	<b>Children's Services</b>	<b>Adult Programs</b>	<b>CalWORKs</b>	<b>Non-Assisted Food Stamps</b>
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 circumstances for using minor interpreter temporarily	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed	None found in cases reviewed
Translated forms (NOA, case plans, letters, etc.) contain translated inserts	None found in cases reviewed	Case file	Case file	Case file

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
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.