



CDSS

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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

November 15, 2011

Jean Dickinson, Director
Inyo County Department of Health & Human Services
P.O. Drawer H
Independence, CA 93525

Dear Ms. Dickinson:

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 April 11-14, 2011. 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.

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.

Sincerely,

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

Enclosure

c: Anna Scott, Civil Rights Coordinator

Linda Patterson, Branch Chief

CDSS CalFresh Program M.S. 8-9-32

Mike Papin, Chief
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Jodie Berger, Regional Counsel
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
Inyo County
Conducted on April 11-14, 2011**

**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

Elsa Garcia

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. DISCRIMINATION COMPLAINT PROCEDURES**
- IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL**
- X. 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) was to assess the Inyo County Department of Health & Human 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 April 11-14, 2011. An exit interview was held 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)
Bishop Career Service Center	920 North Main Street, Bishop	CalFresh & CalWORKS	Spanish
Department of Health and Human Services	162 Grove Street, Bishop	Children Services & Adult Services	-----
Lone Pine Office	380 N Mt. Whitney Drive, Lone Pine	CalFresh & CalWORKS	Spanish

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2010-2014 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 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

Classifications	Total	Bilingual
Eligibility Workers	6	2
Children Social Workers	2	0
Adult Program Workers	2	0
Receptionist/Screeners	2	0
Total	12	2

Program Manager Surveys

Number of surveys distributed	2
Number of surveys received	2

Reviewed Case Files

English speakers' case files reviewed	4
Non-English or limited-English speakers' case files reviewed	36
Languages of clients' cases	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. Depending on the section, required corrective actions are stated at the end of each section, or next to the item cited.

Section IX 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 X of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Applicants can mail in their applications.
Does the county have extended hours to accommodate clients?		X		Accommodations can be arranged if needed.
Can applicants access services when they cannot go to the office?	X			Information can be collected over the telephone, fax and/or by mail. An Integrated Case Worker may visit applicant in their home if needed or requested.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Outreach is disseminated through community events and other local organizations. At the satellite office in Tecopa, residents can

				access services at the community center. Also, two county workers are available to answer questions and refer residents to appropriate services.
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Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)?	X			The Pub 13 is distributed and explained at intake and at annual recertification.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			
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, Ukranian, Vietnamese?	X			Pub 13 is displayed in each waiting area and reception area.
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?		X		All three offices reviewed did not have the Braille and audio format of the Pub 13 at the reception desk area.
Were the current versions of the required posters present in the lobbies?		X		The posters were not updated with the current Civil Right Coordinator contact information at 162 Grove St, Bishop and 920 N Main St, Bishop.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			All staff interviewed knew the location of the required posters.
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			

B. Corrective Actions

Informational Element	Corrective Action Required
Auxiliary aids	Inyo County Department of Health & Human Services shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.4
Posters	Inyo County Department of Health & Human Services shall ensure that the most current version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms. The county welfare department shall place on the posters the name, office telephone number, and office address of the person(s) in the CWD who is responsible for processing discrimination complaints. Div. 21-107.211

C. Recommendation

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.dss.cahwnet.gov/civilrights/YourRights_498.htm.

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. Facility Location: 920 Main Street, Bishop

Facility Element	Findings	Corrective Action
Parking	(Repeat finding from 2005 and 2008) There is no "Unauthorized Parking" signage at entrance to off street.	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
	No "Minimum Fine \$250" signage below the ISA sign.	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
	The freestanding sign height is too low at 72".	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
	(Repeat finding from 2008) There is no access aisle on passenger side of accessible space.	Access aisles should be located on the passenger side of a space, and should be a min. of 18' long by 5" wide for aisles, serving car accessible spaces, and a min. 18' by 8'

	<p>(Repeat finding from 2005 and 2008) The words "No Parking" is not painted in the access aisle.</p> <p>There is no directional signage to accessible entrance/main entrance.</p>	<p>wide for aisles serving van accessible spaces. (CA T24 1129B.3.1) (ADA 4.6.3)</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.3.2) p 135</p> <p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.1) pp 186, 394</p>
Main Entrance	Force to open door is excessive at 15 lbs.	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207
Water fountain	Drinking fountain protrudes more than 4" into passageway.	<p>Protruding objects shall not reduce the clear width or maneuvering space of an accessible route or maneuvering space. (CA T24 1133B.8.6.1) (ADA 4.4.1)</p> <p>Wall protruding objects that have their leading edges between 27" and 80" above the finished floor, shall protrude no more than 4 inches into walks, halls, corridors, passageways or aisles. (CA T24 1133B.8.6.1) (ADA 4.4.1)</p> <p>The floor path shall be textured to be identifiable by</p>

		<p>a blind person using a cane. The minimum textured area shall extend from the wall supporting the water fountain to 12" beyond the front edge of the water fountain and 12" beyond each side of the water fountain., or</p> <p>Wing walls project from the supporting wall at least as far as the water fountain to within 6" of the surface of the path of travel with a min. 32" clearance between the walls." (CA T24 1117B.1.3) pp 232-233</p>
Unisex Restroom	<p>Accessible signage on door is too low at 54".</p> <p>There is no wall signage.</p> <p>There is no knee space under sink.</p>	<p>Door sign and wall sign shall be 60" above the floor to the center line of sign.</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 281</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 282</p> <p>A minimum knee clearance of 27" high, 30" wide, and 19" deep is provided underneath</p>

	<p>Soap dispenser is too high at 43".</p> <p>Mirror base is too high at 53 ½ ".</p> <p>Paper towel dispenser is too high at 47".</p>	<p>sinks. (CA T24 1115B.4.7.1, ADA 4.24.2) p 342</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 T24 1115B.8.3, ADA 4.23.7) p 294</p>
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B. Observation – At the 920 Main Street, Bishop Office, the parking lot is shared with other public businesses. However, the signage posted on lamp post through out the lot does not meet the requirements of the "Unauthorized parking" signage. The sign posted states "PRIVATE PROPERTY PUBLIC PARKING PROHIBITED, UNAUTHORIZED VEHICLES WILL BE TOWED AT OWNER'S EXPENSE". On the contrary, it implies no public parking and does not relate or refer to the no parking in accessible parking space requirement.

C. Facility Location: 162 Grove Street, Bishop

Facility Element	Findings	Corrective Action
Parking	(Repeat finding from 2008) There is no "Unauthorized Parking" signage at entrance to off street.	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>No "Minimum Fine \$250" signage below the ISA sign.</p> <p>(Repeat finding from 2008) The words "No Parking" are not painted in access aisle.</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 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.3.2) p 135</p>
Main Entrance	<p>(Repeat finding from 2005 and 2008) No ISA signage posted on main entrance.</p> <p>Force to open door is excessive at 20 lbs.</p> <p>Bottom 10" of door does not have smooth, uninterrupted surface that allows door to open by wheelchair foot-rest.</p>	<p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.1) pp 186, 394</p> <p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207</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>
Client lobby	<p>(Repeat finding from 2005 and 2008) The height of lobby counter is too high at 40 ¼ ".</p>	<p>Height of accessible tables or counters is between 28" – 34" from floor finish. (CA T24 1122B.4, ADA 4.32.4) p 388</p>

	The Pub 13 was not available in the Braille and auditory format.	The county shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.4
Unisex Restroom	(Repeat finding from 2008) No wall signage.	<p>Door sign and wall sign shall be 60" above the floor to the center line of sign.</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 281</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 282</p>

D. Recommendation

See previous Recommendation under B.

E. Facility Location: 380 N Mt. Whitney, Lone Pine

Facility Element	Findings	Corrective Action
Parking	(Repeat finding from 2005 and 2008) There is No "Unauthorized Parking" signage at entrance to off street.	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
	No "Minimum Fine \$250" signage below the ISA sign.	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
	(Repeat finding from 2005 and 2008) Accessible space is too short at 15".	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p 135
	(Repeat finding from 2008) No access aisle on passenger side of space.	Access aisles should be located on the passenger side of a space, and should be a min. of 18' long by 5" wide for aisles, serving car accessible spaces, and a min. 18' by 8' wide for aisles serving van accessible spaces. (CA T24 1129B.3.1) (ADA 4.6.3)
	(Repeat finding from 2005) There is no van-accessible space.	One in every 8 accessible spaces (and no less than 1 per lot) shall be designated/signed as Van-Accessible. (CA T24 1129.B.3.2, ADA 4.1.2(5)(b)) p 133
		Van-accessible spaces shall

	<p>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.4.2, ADA 4.1.2(5)(B), 4.6.4) p 133</p> <p>(Repeat finding from 2005 and 2008) The words "No Parking" is not painted in access aisle.</p> <p>(Repeat finding from 2005 and 2008) Persons with disabilities are forced to go behind parked cars other than their own.</p> <p>(Repeat finding from 2005 and 2008) The access aisle does not connect to the accessible path of travel</p> <p>(Repeat finding from 2005 and 2008) Parking is not located as close as possible to entrance.</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.3.2) p 135</p> <p>Persons with disabilities shall not be forced to go behind parked cars except their own. (CA T24 1129B.3.3)</p> <p>Access aisles (load and unload) must connect to the accessible path of travel, including curb cuts or ramps as needed (CA T24 1129B.4.3, ADA 4.6.3)</p> <p>Parking shall be located on shortest accessible route. (CA T24 1129B.1.2, ADA 4.3.2(1))</p>
Main entrance	Force to open door is too heavy at 11 lbs.	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207
Client lobby	<p>(Repeat finding from 20085 and 2008) Accessible counter is too high at 45".</p>	Height of accessible tables or counters is between 28" – 34" from floor finish. (CA T24 1122B.4, ADA 4.32.4) p 388

	The Pub 13 was not available in the required auxiliary aides.	The county shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.4
Client Interview Room	There is no turnaround in interview room.	Wheelchair Turning Space is a minimum space for a wheelchair to turn 180 degrees in a 60" diameter or T-shaped space. (CA T24 1118B.3, ADA 4.2.3) p 236
Emergency Alarm	There is only audible alarm.	<p>If emergency warning systems are provided, they should include both audible alarms and visual alarms.</p> <p>If emergency warning systems are required, they shall activate a means of warning the hearing impaired. (CA T24 1114B.2.2, ADA 4.28.1) p 243</p>

F. Recommendation

See previous Recommendation under B.

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

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			The County uses the Language Services Needs Identification Form and SAWS1 to identify a client's language.
Does the county use a primary language form?	X			Language Services Needs Identification form
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			The county has one Integrated Spanish bilingual worker. All Spanish cases are assigned to this bilingual worker. There is a second bilingual Social Worker who can provide back up.
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			All Spanish cases are assigned to bilingual worker. For any other language an interpreter would be called utilizing the Tele – Interpreter line or other community bilingual interpreters.
Is there a delay in providing services?		X		

Question	Yes	No	Some-times	Comments
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			Tele – Interpreter line and/or other community bilingual interpreters.
Are county interpreters determined to be competent?	X			Bilingual workers must pass a verbal and written test.
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?		X		Only in the event of an emergency or unusual extenuating circumstance a minor may be allowed to interpret.
Does the county allow the client to provide his or her own interpreter?	X			If client prefers to use their own interpreter, they both must sign the Certification of Confidentiality Form.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			It is verbally explained to both client and interpreter when they are signing Certification of Confidentiality Form.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			
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,		X		All of the offices reviewed did not have the auxiliary aids; Braille and audio formats.

Question	Yes	No	Some-times	Comments
speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?				
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			Staff interviewed stated they would assist a client who has a learning disability or unable to read.
Does the county offer screening for learning disabilities?	X			In the CalWORKs program.
Is there an established process for offering screening?	X			In the CalWORKS program
Is the client identified as having a learning disability referred for evaluation?	X			If a client is identified for a learning disability they are referred to outside contractor for evaluation.

B. Corrective Actions

Area of Findings	Corrective Actions
Auxiliary Aids	Inyo County Department of Social Services shall ensure the availability of auxiliary aids and services to persons who are deaf or hearing impaired, or persons with impaired speech, vision or manual skills where necessary to afford such persons an equal opportunity to access program services. Div 21-115.41

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	CalFresh
Ethnic origin documentation	ER Referral form, CWS/CMS	SOC 295	SAWS1	SAWS1
Primary language documentation	Various documents	SOC 295	Language Service Needs Identification	Language Service Needs Identification
Method of providing bilingual services and documentation	No documentation found in case file notes.	Bilingual worker used. No documentation in case files notes.	Bilingual worker used. No documentation in case files notes.	Bilingual worker used. No documentation in case files notes.
Client provided own interpreter	None found in case sample.	Certification of Confidentiality	None found in case sample.	None found in case sample.
Method to inform client of potential problem using own interpreter	None found in case sample.	Verbally inform client upon signing Certification of Confidentiality	None found in case sample.	None found in case sample.
Release of information to Interpreter	None found in case sample.	Certification of Confidentiality	None found in case sample.	None found in case sample.
Individual's acceptance or refusal of written material offered in primary language	Language Service Needs Identification	Language Service Needs Identification	Language Service Needs Identification	Language Service Needs Identification
Documentation of minor used as interpreter	None found in case sample.	None found in case sample.	None found in case sample.	None found in case sample.

Documented Item	Children's Services	Adult Programs (IHSS & APS)	CalWORKs	CalFresh
Documentation of circumstances for using minor interpreter temporarily	N/A	N/A	N/A	N/A
Translated notice of actions (NOA) contain translated inserts	Bilingual worker will translate any insert in form if needed.	Bilingual worker will translate any insert in form if needed.	Bilingual worker will translate any insert in form if needed.	Bilingual worker will translate any insert in form if needed.
Method of identifying client's disability	None found in case sample.	Case narrative	None found in case sample.	None found in case sample.
Method of documenting a client's request for auxiliary aids and services	None found in case sample.	None found in case sample.	None found in case sample.	None found in case sample.

B. Corrective Actions

Areas of Action	Corrective Action
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; All County Letter No. 08-65, dated December 31, 2008.
General	Inyo County Department of Health & Human Services must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

C. Observation/Recommendation

The reviewer observed the Language Services Needs form was included in every case reviewed. It is apparent that Inyo County Department of Health & Human Services is providing interpretive services utilizing a Spanish bilingual worker. The Language Services Needs Form itself does not have all the requirements outlined in the All County Letter No. 08-65, dated December 31, 2008, under Required Documentation. The completed form must be signed and dated by both worker and client in the client's primary language for written communication. Inyo County form only provides for county staff signature and not for the client. The county is required to inform the reviewer they are using this form in lieu of an entry in the case record. For this review, the county failed to inform the reviewer.

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			Staff receives continued Division 21 training.
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			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?		X		One CSW interviewed stated they do not recall receiving MEPA training.

Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			
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B. Corrective Actions

Training Area	Corrective Action
MEPA Training for Children's Social Workers	Inyo County Department of Health & Human Services shall ensure that CSW's receive MEPA training to ensure that public contact staff has knowledge of, and properly apply the placement prohibitions contained in MEPA. 42 U.S.C. 672, 674, and 1996(b)

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

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			
Did the employees know who the Civil Rights Coordinator is?	X			Employees knew who their Civil Rights Coordinator was.
Did the employees know the location of the Civil Rights poster showing where the clients can file a				Staff was aware of the location of the required poster.

Interview and review areas	Yes	No	Some-times	Findings
discrimination complaint?	X			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

Thank you for submitting your agency's Civil Rights Compliance Plan. Before approval, however, we are requesting the following augmentation to your plan:

a. Section II. Assignment of Resources

Please submit this item with your corrective action plan for this review.

X. CONCLUSION

The CDSS reviewer found the Inyo County Department of Health & Human Services staff warm, welcoming, informative and very supportive. Particular thanks to Anna Scott, Civil Rights Coordinator, for organizing the details of the review. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

CDSS found the Inyo County Department of Social Services has multiple repeat findings at all offices visited from previous years; 2005 and 2008 Compliance Reviews. These findings need to be remedied and addressed in the Corrective Action Plan.

Although County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance, the CDSS found the Inyo County Department of Health & Human Services in substantial non-compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. Particularly troubling were the repeat findings from reviews in 2005 and 2008 dealing with accessibility, and the lack of documentation of language services.

The Inyo County Department of Health & Human 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.