



CDSS

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**DEPARTMENT OF SOCIAL SERVICES**  
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EDMUND G. BROWN JR.  
GOVERNOR

June 10, 2013

Elliott Robinson, Director  
Monterey County  
Department of Social and Employment Services  
1000 S. 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. Mary Rockwood during the course of the Civil Rights Compliance Review of April 26-19, 2010. 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.

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. 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) 651-6242. You may also contact us by e-mail at [crb@dss.ca.gov](mailto:crb@dss.ca.gov).

We apologize for the delay in delivery of this report.

Sincerely,

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  
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR  
MONTEREY COUNTY  
DEPARTMENT OF SOCIAL & EMPLOYMENT SERVICES**

**Conducted April 26-29, 2010**

**California Department of Social Services**

**Human Resources Management Division**

**Civil Rights Bureau**

**744 P Street, MS 8-16-70**

**Sacramento, CA 95814**

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**Reviewer**

**Mary Rockwood**

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## CIVIL RIGHTS COMPLIANCE REVIEW REPORT

### I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Monterey County Department of Social and Employment Services (DSES) 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.

Interviews with selected public contact staff were held by telephone prior to the on-site review, which was conducted on April 26-29. An exit interview was held with administrative staff on April 29, 2010.

The 2010 review was conducted in the following locations:

<b>Facility</b>	<b>Address</b>	<b>Programs Reviewed</b>	<b>Languages spoken by a substantial number of clients</b>
Salinas Main District Office	1000 S. Main St.	CalWORKS; NAFS	English & Spanish
Salinas One Stop	730 Laguardia	Employment Services	English & Spanish
Seaside District Office	1281 Broadway	CalWORKs;NAFS; CPS	English & Spanish
Marina Coastal Office	2620 First Ave.	IHSS	English & Spanish
Laguardia District Office	713 Laguardia	IHSS	English & Spanish

## II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2010-2011 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:

- Interviews of public contact staff
- Case file reviews
- Facility inspections
- Review of Program Manager Surveys

Below is a summary of the sources of information used for the report:

### Interviews Conducted with Public Contact Staff

<b>Classifications</b>	<b>Total</b>	<b>Bilingual</b>
Eligibility Workers	8	(6)
Lobby Receptionist/Superv.	2	(2)
Social Worker	6	(2)
Employment & Training Worker/Specialist	2	(1)
<b>Total</b>	<b>18</b>	<b>(11)</b>

### Case File Review (Total 114 cases)

English speakers' case files reviewed	04
Non-English or limited-English speakers' case files reviewed	108
Undocumented/Unable to determine	02
Languages of non-English cases	Spanish, Vietnamese,, Russian, Korean, Tagalog, Cambodian

### Program Manager Surveys

Number of surveys distributed	Unknown
Number of surveys received	5

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. Any required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a discussion 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		According to manager surveys, regular work hours are maintained (8:00-5:00). Mail, phone and internet access are alternatives for clients in making application.
Does the county have extended hours to accommodate clients?		X		
<b>Access to Services, Information and Outreach</b>				
Can applicants access services when they cannot go to the office?	X			Alternatives include access via the telephone, mail, and home visits when necessary.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Outreach for the agency is conducted by McChoice Staff.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs"?	X			The pamphlet is an established part of the intake and annual packets.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			The distribution is made routinely and discussion is included with the orientation sessions.
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Armenian and Cambodian?	X			Only the English and Spanish versions were displayed in the lobby due to the narrow diversity of clients; however a binder is maintained by reception staff which includes the translated versions as well as alternate formats.
Was the Pub 13 available in large print, audiocassette and Braille?	X			The alternative formats were maintained by reception staff in the lobby.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			
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			Translated instructional and informational material was provided in the only threshold language of Spanish.

**B. Corrective Actions:** None required.

#### IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act 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 ADAAG in the Corrective Action column refers to the federal Standards for Design, and the Title 24 of California Code and Regulations (T24 CCR) are also cited because there are instances when California state law is more stringent 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 Americans with Disabilities Act Accessibility Guidelines (ADAAG).

##### Facility Location # 1: Salinas Main – 1000 South Main Street

Facility Element	Findings	Corrective Action
Parking	1. There was no warning signage for unauthorized parking in accessible spaces.	1. Additional signage shall be posted in a conspicuous place at entrances or adjacent to and visible from each space stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates may be towed away at owner's expense. (CA T24 1129B.5)

Facility Element	Findings	Corrective Action
	2. The signage designating accessible parking spaces was not complete.	2. Additional sign below the symbol sign shall state "Minimum Fine \$250.00. (CA T24 1129B.4.1)
Building Entrance	The door pressure was measured at 15 pounds, however, the building had a doorbell at the entrance for individuals to use when assistance was needed to enter the building.	No corrective action required – this is an excellent accommodation.
Reception Lobby	Telephones for clients to use to call their workers are mounted too high for access by those in a wheelchair.	
Accessible Restrooms	1. Entry to the restrooms requires double action (the door could not be opened with a closed fist). One needs to insert a key and turn that key, then push to open the door.	If hand-operated, the entry must be possible with a single effort (e.g., lever, panic bar, push/pull). (CA T24 1133B.2.2)

**Facility Location # 2: Seaside District Office – 1281 Broadway**

Facility element	Findings	Corrective Action
Parking	1. There was no warning signage for unauthorized parking in accessible spaces	1. Additional signage shall be posted in a conspicuous place at entrances or adjacent to and visible from each space stating:

Facility element	Findings	Corrective Action
	<p>2. The accessible parking spaces did not have the necessary stripe painting with the words "No Parking" painted on the pavement within the access aisles.</p> <p>3. The number of designated accessible parking spaces was adequate; however, the designated van accessible space did not have the required 8' clearance/access aisle.</p> <p>4. There were no free standing signs at the designated assessable parking spaces except for the one at the space stating van accessible. This sign at this space was too low (as well as the deficiency noted above regarding the access aisle).</p>	<p>"unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates may be towed away at owner's expense. (CA T24 1129B.5)</p> <p>2. The words "NO PARKING" shall be painted on the ground in each 5 feet or 8 feet loading and unloading access aisle in white letters no smaller than 12 inches. (CA T24 1129B.4.1 &amp; 2). (See picture below with item 4)</p> <p>3. One in every 8 accessible spaces (no fewer than 1) shall be designated van accessible. (CA T24 1129B.4.2, ADA 4.1.2(5)(b)). Van access aisle shall be 18'x8' minimum on the passenger side. (CA T24 1129B.3.1, ADA 4.6.3)</p> <p>4. Sign height at each designated space shall be 80" minimum from the bottom of the sign to top of finish grade/pavement. (CA T24 1129B.4.1, ADA 4.6.5)</p> 

Facility element	Findings	Corrective Action
Building Entrance	<p>1. The amount of force/pressure required to open the entrance doors was excessive. There was no actual measurement taken, because the issue is one of the inoperable push button that was installed to provide access. The mechanism was not able to assist in accessing the building.</p>	<p>1. Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)]</p> <p>Note: The accommodation intended is acceptable, but must be made operable.</p> 
Restrooms	<p>1. Signage on the door and wall adjacent to both the men's and women's restroom did not meet requirements.</p>	<p>1. In addition to the international symbol centered on doors at a height of 60" above the floor (CA T24 1115B.5), signage for gender identification shall be installed on the wall adjacent to the latch outside of the door. If there is no space, the sign shall be placed on the nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6)</p>
Access to Second Floor	<p>There were no elevators for use in moving to the second floor. The only access was to climb a set of stairs to the second level.</p>	<p>Entire second floor deemed inaccessible.</p>

## 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 (TDDs), 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 be in the individuals' primary language.

### A. Findings from 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			Each facility is staffed with bilingual Spanish-speaking reception staff and assist in identifying the language of choice.
Does the county use a primary language form?		X		<u>Reader is directed to further discussion following the listing of findings for this section.</u>
Does the client self-declare on this form?	-	-	-	
Are non-English- or limited- English-speaking clients provided bilingual	X			Bilingual staffing provides excellent verbal bilingual services for the Spanish-speaking clients, which

Question	Yes	No	Some-times	Comments
services?				<p>represent the vast majority of the non-English-speaking population. The exception is the client population that speaks the Oaxaca dialect. For those clients, family or friends are generally needed to assist.</p> <p>According to staff, when other languages are spoken, it is often the preference of clients to provide their own interpreters; however, the Language Line telephone service is utilized as well as Vietnamese bilingual staff in the Seaside office.</p>
After it has been determined that the client is limited-English or non-English speaking, what is the county process for procuring an interpreter?	-	-	-	Non-English speaking clients are assigned to bilingual workers in most cases. When not possible, social service aides or co-workers are utilized to assist in providing interpretation services.
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			
Are county interpreters determined to be competent?	X			Bilingual workers are tested and certified by the agency.
Does the county have adequate interpreter services?	X			At the present time, Spanish-speaking clients represent the vast majority of the non-English speaking population and sufficient bilingual staffing and interpreter services appear to be in place. As noted, there is a shortage of individuals to assist with those who

Question	Yes	No	Some-times	Comments
				speak the Oaxaca dialect.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		
Does the county allow the client to provide his or her own interpreter?	X			According to staff, it is common for clients to bring someone with them to serve as an interpreter if their primary language is other than English or Spanish.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			Spanish forms are readily available, and were found in the cases reviewed. English forms were found in the few cases where languages other than Spanish were spoken. In absence of documentation of client choice, it could not be determined if, in fact, clients chose the English forms.
Is the information that is to be inserted into Notices of Action translated into the client's primary language?	X			
Does the county provide auxiliary aids and services, telecommunication devices for the deaf (TDDs) and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large	X			<p>TDD/TTY equipment is available and staff indicated that ASL interpreters would be available to assist a hearing impaired client who requested to use sign language. Staff tended, however, to state that passing notes would be the method of communication used with the hearing impaired.</p> <p>According to staff, the primary means to assist visually impaired</p>

Question	Yes	No	Some-times	Comments
print materials (besides the Publication 13)?				clients would be to have a third party assist them by reading and signing documents for them. There was no mention of alternative methods such as magnifying glasses, large print or copy machine enlargement.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			In the course of processing, staff assist those clients who cannot read or write by reading to them and helping with the completion of forms.
Does the county offer screening for learning disabilities?	X			This occurs in the Welfare to Work Program.
Is there an established process for offering screening?	X			The offer is made as part of the initial assessment process in CalWORKs employment services.
Is the client identified as having a learning disability referred for evaluation?	X			Further testing and evaluation is provided when appropriate.

### **Additional Discussion – Primary Language Form**

There were repeated findings year after year with respect to the offer of translated written material and the documentation of that offer in case records. Monterey DSES developed a primary language form as part of a prior year's corrective action to address that Division 21 requirement to offer translated forms to clients with a primary language other than English and to document client acceptance or refusal of that offer. The form has been included as a part of the Annual Civil Rights Plan.

In spite of the form's development and inclusion in the Annual Plan, there has been no implementation of policy requiring its use. As a matter of management decision, the form has not been adopted for use. Therefore, the Primary Language Form exists in name only

and not as a practiced casework procedure. This will be addressed again in the section of this report outlining Case Documentation findings.

## B. Corrective Actions

Area of Findings	Corrective Actions
Use of Translated Forms (Delivery of Language Services)	<p>(See discussion above regarding the use of the revised Primary Language Form.) There is currently no assurance that translated written material is available and offered to non-English speaking clients. If the management decision is not to utilize the form developed for this purpose, alternate corrective action is necessary to ensure that required language services (both spoken AND written) are being provided.</p> <p>In addition, it is inappropriate to include a provision outlining the use of a form/procedure in the annual plan when there is no intention of complying with that provision. At such time as the plan is to actually utilize the form, it should be considered for inclusion.</p>

## 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

Documentation Item	<i>Cal WORKs</i>	<i>Food Stamps (NAFS)</i>	<i>IHSS</i>	<i>CPS</i>
Ethnic Origin	SAWS 1	DFA 285 A1or SAWS 1	Soc 295	ER Initial Referral Form

Primary language	Saws 1	DFA 285 A1 or SAWS 1	Soc 295 7	ER Initial Referral Form
Method of providing bilingual services	Journal Narrative – however, this is only done when a third party is utilized.  As a matter of policy and practice, Bilingual workers are not required by the agency to provide documentation of their role in providing language services.	Journal Narrative – however, this is only done when a third party is utilized.  As a matter of policy and practice, Bilingual workers are not required by the agency to provide documentation of their role in providing language services	The case narrative comments were well documented when interpreters were utilized – bilingual social workers did an excellent job documenting when they served as the interpreter.	The case narrative comments were well documented when interpreters were utilized – bilingual social workers did an excellent job documenting when they served as the interpreter
Client provided own interpreter	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in sample	Case Narrative well documented.	N/A – only agency provided interpreters utilized.
<b>Documentation Item</b>	<b>Cal WORKs</b>	<b>Food Stamps (NAFS)</b>	<b>IHSS</b>	<b>CPS</b>
Method to inform client of potential problem of ineffective communication using own interpreter	Not a practice of workers	Not a practice of workers	Not a practice of workers	N/A
Release of information to Interpreter	Language Interpretation Notice of Understanding	Language Interpretation Notice of Understanding	Language Interpretation Notice of Understanding	N/A

Individual's acceptance or refusal of written material offered in primary language	No Documentation	No Documentation	No Documentation	N/A
Translated NOAs contain translated inserts	Workers insert when C-IV does not print necessary detail	Workers insert when C-IV does not print necessary detail	Workers insert when C-IV does not print necessary detail	N/A
Documentation of minor used as interpreter	N/A	N/A	N/A	N/A
Method of identifying client's disability	Would be Journal Entry if applicable	Would be Journal Entry if applicable	Narrative	Various Documents if applicable
Method of documenting a client's request for auxiliary aids and services	Would be Journal Entry if applicable	Would be Journal Entry if applicable	Narrative	

### **Additional Comments:**

The findings related to deficiencies in documenting delivery of interpreter service by bilingual staff have been ongoing for the past several reviews. In 2010, there was again a finding in this area. Bilingual Eligibility staff are not being required to document in the case record that they have served as the interpreter in their non-English speaking cases. Only when a third party (co-worker, Language Line or client-provided interpreter) is used is the eligibility staff documenting language services in their journal entry.

**Note:** Social Workers in both IHSS and CPS do an excellent job in documenting when language services are provided – both when they, as bilingual staff, or others serve as interpreters for non-English speaking clients. The deficiency/finding, therefore, applies to the Food Stamps and Cash programs where eligibility workers maintain the case files.

Monterey DSES developed a primary language form as part of a prior year's corrective action to address another Division 21 requirement that there be documentation of an offer of translated forms to clients with a primary language other than English and to document

client acceptance or refusal of that offer. The form has been included as a part of the Annual Civil Rights Plan. In spite of the form's development and inclusion in the Annual Plan, there has been no implementation of policy requiring its use. As a matter of management decision, the form has not been adopted for use. There remains no documentation by eligibility staff of the client's choice of translated written material.

### B. Corrective Actions

Areas of Action	Corrective Action
Documentation that bilingual services were provided (Interpreters)	Monterey County DSES must ensure that staff 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
Documenting Offer of Translated Written Material/Forms	DSES must ensure that individuals who designate their primary language as one other than English are offered forms in their primary language when made available by CDSS. The acceptance or refusal of this offer is to be documented in the case record.. Div. 21- 116.21

## 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	Sometimes	Comments
Do employees receive continued Division 21 Training?	X			Staff receive civil rights training as new employees and subsequently every two years thereafter.

Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			Referrals are made to the HR department (Civil Rights Coordinator).
Does the county provide employees Cultural Awareness Training?	X			
Do the employees seem knowledgeable about the cultural groups receiving services in their area?	X			

**B. Corrective Action: None Required**

**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. The Civil Rights Coordinator primarily uses this log once complaints get to him/her.

**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	Some of the staff did not seem to distinguish between the processes for fair hearings on program issues and a separate process for addressing civil rights complaints.
Did the employees know who the Civil Rights Coordinator is?	X			.
Did the employees know	X			They had a general

Interview and review areas	Yes	No	Some-times	Findings
the location of the Civil Rights poster showing where the clients can file a discrimination complaint?				knowledge that such a poster was in the lobby area.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	-	-	-	The complaint log will be reconciled against the data base of complaints maintained by the Civil Rights Bureau. Any discrepancy will be discussed with the CRC.

**B. Corrective Action: None Required**

**IX. CONCLUSION**

Monterey County Department of Social and Employment Services (DSES) is in substantial compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 regulations, and other applicable state and federal civil rights laws. There were repeat deficiencies of substance related to documentation requirements; however, there was clear evidence that the deficiencies were limited to the documentation and not the delivery of the services to the non-English speaking client population. Workers reflected professionalism and consistent effort to ensure the necessary language services were provided.

The issues outlined in the case documentation section of this report were discussed at the exit meeting which was attended by the Director, Elliott Robinson. There was open and frank discussion concerning the documentation not being provided by eligibility staff. Local management views it as a workload issue at a time when caseloads continue to grow and staffing remains limited. The director clearly stated his priority that staff spends their time on the delivery of the services to their clients to and to meeting the needs of those individuals without the workload associated with additional documentation requirements.

While there are the referenced documentation issues, this reviewer found the agency to be responsive to the special needs of the client population and observed staff to be professional and compassionate in their work. The other findings outlined in this report address facility issues and do not present major issues except for the absence of an elevator to the second floor of the Seaside facility. This condition actually renders the second floor of this site inaccessible to the disabled.

Monterey County Department of Social and Employment Services 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.