



CDSS

WILL LIGHTBOURNE
DIRECTOR

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

April 10, 2012

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

Dear Ms. Dickinson:

Thank you for submitting your agency's Corrective Action Plan of January 2012, which responded to our Civil Rights Compliance Review of May 23-27, 2011. We appreciate the effort you are taking in correcting the deficiencies identified.

We are tentatively approving your Corrective Action Plan, on the assumption that these items will be completed. Please send us a status report by July 13, 2012, providing confirmation of completion of the corrective actions.

We will be monitoring the implementation of your corrective action items through your Civil Rights Coordinator, Anna Scott. Upon receipt of the requested revisions/information, our office will approve the Corrective Action Plan.

If you have any questions, please contact Elsa Garcia 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

c: Anna Scott, Civil Rights Coordinator

Linda Patterson, Branch Chief
CDSS CalFresh Program M.S. 8-9-32

Mike Papin, Chief
CalFresh Policy Bureau M.S. 8-9-32

Marlene Fleming, Chief
Field Operations Bureau M.S. 8-9-32

Brian Tam, Chief
CalFresh Management Operations Section M.S. 8-9-32

Paul Gardes
CalFresh Policy Bureau M.S. 8-9-32

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Refugee Programs Bureau, M.S. 8-8-46

Joe Torres, Office of Civil Rights
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
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Hope Rios,
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Jodie Berger, Regional Counsel
Legal Services of Northern California



Inyo County Corrective Action Plan
for the Civil Rights Compliance Review Report for the
Review Conducted April 11-14, 2011

Inyo County Department of Health and Human Services
Social Services Division

January 2012

County of Inyo Department of Health and Human Services
Social Services Division
Civil Rights Corrective Action Plan

County of Inyo Department of Health and Human Services
Social Services Division
Civil Rights Corrective Action Plan

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County of Inyo Department of Health and Human Services
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Overview

On April 11-14, 2011 the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) conducted an on-site compliance review with the purpose of assessing the Inyo County Department of Health and Human Services with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulation, and other applicable state and federal civil rights laws. The review was conducted in the Bishop offices located at 920 N. Main Street and 162 Grove Street as well as the Lone Pine Office at 380 N. Mt. Whitney Drive.

Several deficiencies were identified and since the time of the on-site review, corrective actions for all of the findings have been identified and timelines established; they are discussed in this document. Due to the fact that several deficiencies were identified in prior site reviews, the County is willing to provide confirmation to the CRB upon completion of the corrective actions, if desired.

Findings

Dissemination of Information

Auxiliary Aids

Corrective Action Required- Inyo County Department of Health and 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.

Timeline- Complete

Forms coordinators in each building maintain a supply of large print, Braille, and audio versions of the PUB 13. Audio CDs are available in English, Spanish, Vietnamese, Russian, and Chinese (Mandarin).

Posters

Corrective Action Required- Inyo County Department of Health and 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.

Timeline- Complete

This finding has been corrected. New posters were ordered from the Office of Civil Rights and have been updated with the contact information of the current Civil Rights Coordinator.

Facility Accessibility for Individuals with Disabilities

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920 Main Street, Bishop

Corrective Action Required in regards to 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. 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
- For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol with shall state “Minimum Fine \$250.00.” (CA T24 1129B.4.2) p 133
- 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
- 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)
- 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
- 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

Timeline- To be completed by May 31, 2012

Because the Inyo County Department of Health and Human Services leases its facilities, these findings cannot be corrected without the approval of the lessor. A letter was sent to the lessor in December 2011, requesting that the above findings be corrected. Though a written response has not been received, we anticipate that the landlord will authorize the County to purchase and post new signage and to restripe handicapped parking spaces in the parking lot.

Corrective Action Required in regards to the main entrance

- 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

Timeline- To be completed by April 30, 2012

A work order will be submitted to the County Public Works Department.

Corrective Action Required in regards to the water fountain

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- Protruding objects shall not reduce the clear width or maneuvering space of an accessible route or maneuvering space. (CA T24 113B.8.6.1) (ADA 4.4.1)
- 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 133B.8.6.1) (ADA 4.4.1)
- The floor path shall be textured to be identifiable by a blind person using a cane. The minimum textured area shall extend from the wall supporting the water fountain and 12" beyond each side of the water fountain., or
- 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) p 232-233

Timeline- To be completed by April 30, 2012

Because the Inyo County Department of Health and Human Services leases its facilities, these findings cannot be corrected without the approval of the lessor. A letter was sent to the lessor in December 2011, requesting that the above findings be corrected. Though a written response has not been received, we anticipate that the landlord will authorize the County to remove the drinking fountain, thereby eliminating the obstacle from the accessible route.

Corrective Action Required in regards to the unisex restroom

- Door sign and wall sign shall be 60" above the floor to the center line of sign.
- 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
- Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case character accompanied by Grace 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 282

Timeline- Complete

Permanent identification signs with raised 1/32", Sans Serif uppercase character accompanied by Grace 2 Braille have been installed on the wall adjacent to the latch outside of the door.

Corrective Action Required in regards to the unisex restroom

- A minimum knee clearance of 27" high, 30" wide, and 19" deep is provided underneath sinks. (CA T24 1115B.4.7.1, ADA 4.24.2) p 342
- 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

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Timeline- To be completed by April 30, 2012

Because the Inyo County Department of Health and Human Services leases its facilities, these findings cannot be corrected without the approval of the lessor. A letter was sent to the lessor in December 2011, requesting that the above findings be corrected. Though a written response has not been received, we anticipate that the landlord will authorize the County to remove the cabinet under the bathroom sink and to relocate fixtures within the bathroom so that the operable parts, including coin slots, are at a maximum height of 40”.

162 Grove Street, Bishop

Corrective Action Required in regards to 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. in size with lettering 1” min. high stating: “Unauthorized vehicles parking 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
- 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 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

Timeline- To be completed by March 31, 2012

A requisition for unauthorized parking, minimum fine, and accessible entrance signage has been submitted and signage will be installed upon receipt.

A work order will be submitted to the County Public Works Department to paint the words “NO PARKING” in the unloading access aisle.

Corrective Action Required in regards to the main entrance

- 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

Timeline- To be completed by March 31, 2012

A requisition for unauthorized parking, minimum fine, and accessible entrance signage has been submitted and signage will be installed upon receipt.

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- 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
- 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

Timeline- To be completed by March 31, 2012

A work order will be submitted to the County Public Works Department to adjust the force to open the door and to add a kick plate to the accessible main entrance.

Corrective Action Required in regards to the client lobby

- 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

Timeline- Complete

Forms coordinators in each building also maintain a supply of large print, Braille, and audio versions of the PUB 13. Audio CDs are available in English, Spanish, Vietnamese, Russian, and Chinese (Mandarin).

Corrective Action Required in regards to the client lobby

- Height of accessible tables or counter is between 28"-34" from floor finish. (CA T24 1122B.4, ADA 4.32.4) p 388

Timeline- To be completed by February 29, 2012

A work order will be submitted to the County Public Works Department to adjust the counter height to between 28"-34" as part of a project already in process to improve safety in the front office.

Corrective Action Required in regards to the unisex restroom

- 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
- 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

Timeline- Complete

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A permanent identification sign with raised 1/32", Sans Serif uppercase character accompanied by Grace 2 Braille has been installed on the wall adjacent to the latch outside of the door.

- Door sign and wall sign shall be 60" above the floor to the center line of sign.

Timeline- To be completed by February 29, 2012

The existing sign cannot be moved without damage to the sign. Therefore, a requisition for a new unisex bathroom sign has been submitted and the sign will be installed upon receipt.

380 N. Mt. Whitney, Lone Pine

Corrective Action Required regarding parking

- Additional sign shall be posed 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
- 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.3.1, ADA 4.6.3) p 135
- Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p 135
- 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)
- 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 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.
- 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
- Persons with disabilities shall not be forced to go behind parked cars except their own. (CA T24 1129B.3.3)
- 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)

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- Parking shall be located on shortest accessible route. (CA T24 1129B.1.2, ADA 4.3.2(1))

Timeline- To be completed by June 30, 2012

A requisition for unauthorized parking, minimum fine, and accessible entrance signage has been submitted and signage will be installed upon receipt.

Because the Inyo County Department of Health and Human Services leases its facilities, these findings cannot be corrected without the lessors' approval. The County expects a response by February 15, 2012.

Upon lessor's approval, a work order will be submitted to the County Public Works Department to relocate the accessible parking to a location closest to the accessible entrance, so that persons with disabilities will not be forced to go behind parked cars except their own. The access isle will be connected to the accessible path of travel. This accessible parking space will be van accessible and the words "NO PARKING" will be painted in the unloading access isle.

Corrective Action in regards to the main entrance

- 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

Timeline: To be completed by June 30, 2012

A work order will be submitted to the County Public Works Department to adjust the force to open the accessible entrance door.

Corrective Action in regards to the client lobby

- Height of accessible tables or counter is between 28"-34" from floor finish. (CA T24 1122B.4, ADA 4.32.4) p 388

Timeline: To be completed by June 30, 2013

Upon lessor's approval, a work order will be submitted to the County Public Works Department to adjust the counter height in the lobby to between 28"-34". This project is not expected to be completed until the 2012/13 fiscal year.

Corrective Action in regards to the client lobby

- 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

Timeline: Complete

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Forms coordinators in each building also maintain a supply of large print, Braille, and audio versions of the PUB 13. Audio CDs are available in English, Spanish, Vietnamese, Russian, and Chinese (Mandarin).

Corrective Action in regards to the client 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

Timeline- To be completed by June 30, 2013

Given the current staffing and configuration of the office, the interview rooms cannot be made compliant without renovation (i.e. removing walls or fixed furniture). Therefore, the CRC is working with Social Services staff and other departments/programs within the building to investigate different office configurations. If a significant expenditure is required (e.g. purchase new furniture), the remediation will be prioritized in the 2012/13 fiscal year.

Corrective Action in regards to the emergency alarm

- If emergency warning systems are provided, they should include both audible alarms and visual alarms.
- If emergency warning systems are required, they shall activate a means of warning the hearing impaired. (CA T24 1114B.2., ADA 4.28.1) p 243

Timeline- To be completed by June 30, 2013

A work order will be submitted to the County Public Works Department that will include both a lowered counter in the lobby area and the addition of visual alarms. Due to the extent of the project, we do not anticipate that this project will be completed until FY 2012/13.

Provision for Services to Applicants and Recipients who are non-English-speaking or who have Disabilities

Corrective Action Required regarding 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

Timeline- Complete

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Forms coordinators in each building maintain a supply of large print, Braille, and audio versions of the PUB 13. Audio CDs are available in English, Spanish, Vietnamese, Russian, and Chinese (Mandarin).

Information has been added to annual Civil Rights refresher training materials to provide Social Services staff with instruction on how to use the 711 Telecommunications Relay Services. This service can be used for telephone contact with consumers who are deaf, hearing impaired, or speech impaired, and who use a Tele-Typewriter (TTY) device.

Documentation of Applicant/Recipient Case Records

Corrective Action Required regarding bilingual services

- Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employees acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 2-116.22; All County Letter No. 08-65, dated December 31, 2008.

Timeline- To be completed by June 30, 2012

The CRC developed and implemented a Language Services Needs Identification form in 2009. However, the form was not always used and/or filed consistently in the files reviewed. Therefore, in addition to addressing this form's purpose during annual refresher training, the CRC will develop and implement a quality assurance procedure to review cases annually for compliance.

Corrective Action Required regarding general findings

- Inyo County Department of Health and Human Services must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

Timeline- To be completed by June 30, 2012

In addition to addressing this form's purpose during annual refresher training, the CRC will develop and implement a quality assurance procedure to review cases annually for compliance.

Staff Development and Training

Corrective Action Required regarding MEPA Training for children's social workers

- Inyo County Department of Health and 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)

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Timeline- Complete

The Civil Rights Coordinator has confirmed that MEPA training is provided to all Social Worker staff during the Social Worker CORE II training phase. The particular social worker who indicated s/he did not have the training likely was in the second phase of CORE training, but had not yet reached the module. The MEPA training is available online and will be incorporated into annual Civil Rights refresher training for all child welfare social workers and supervisors.

Discrimination Complaint Procedures

No Corrective Actions Required

Civil Rights Compliance Plan Review and Approval

- Section II. Assignment of Resources

Timeline- Complete

Section II of the Civil Rights Compliance Plan has been revised to reflect the current Civil Rights Coordinator. Please see Attachment A.

Conclusion

Inyo County recognizes and values the diversity of our community. We take pride in the fact that there have been no substantiated discrimination complaints in several years. We will continue to deliver excellent service to our culturally diverse population, and every effort will be taken to remediate to findings of the 2011 Civil Rights Compliance Review within the constraints of current lease agreements, staffing levels, and budgets.