



KIM JOHNSON  
DIRECTOR

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



GAVIN NEWSOM  
GOVERNOR

July 9, 2019

Sanja Bugay, Director  
Kings County Human Services Agency  
1400 W. Lacey Blvd. Bldg 8  
Hanford, CA 93230-5962

Dear Ms. Bugay:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review in July 2018. Enclosed is the final report of the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with the Web Content Accessibility Guidelines (WCAG) as per California Government Code 7405, we also require the CAP to be submitted electronically as a Word document via [Civil Rights Unit email](mailto:crb@dss.ca.gov) (crb@dss.ca.gov).

We will provide a copy of your report to any individual who makes a valid public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our [Civil Rights Unit website](http://www.cdss.ca.gov/inforesources/Civil-Rights/Compliance-Reports-and-Corrective-Action-Plans) (<http://www.cdss.ca.gov/inforesources/Civil-Rights/Compliance-Reports-and-Corrective-Action-Plans>).

If you need technical assistance in the development of your CAP, please feel free to contact Ms. Claudia Cabrera at 916-654-1047. You may also contact us via [Civil Rights Unit e-mail](mailto:crb@dss.ca.gov) (crb@dss.ca.gov).

Sincerely,

**ORIGINAL DOCUMENT SIGNED BY**

CHRISTINA TEIXEIRA, Manager  
Civil Rights Unit  
Housing, Homelessness & Civil Rights Branch  
Enclosure

c: Heather Shinn Shannon, Civil Rights Coordinator

Alexis Fernandez, Acting Chief  
CalFresh Branch

Tami Gutierrez, Chief  
CalFresh Operations Bureau

Alexis Fernandez, Chief  
CalFresh Policy Bureau

Francisco Verduzco, Chief  
CalFresh Technical Assistance and Evaluation Section

Jacqueline Hom  
County Operations Manager

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

Maribelle Balbes, Chief  
USDA Food and Nutrition Services  
Supplemental Nutrition Assistance Program (SNAP)  
Western Region

Kevin Aslanian  
Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier  
Western Center on Law and Poverty

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR  
Kings County Human Services Agency**

**Conducted on  
July 18-20, 2018**

**California Department of Social Services  
Housing, Homelessness, and Civil Rights Branch**

**Civil Rights Unit**

**744 P Street, M.S. 8-16-70**

**Sacramento, CA 95814**

**(916) 654-2107**

**Reviewer: Claudia Cabrera**

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## I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Unit (CRU) staff was to assess the Kings County Human Services Agency with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on July 18-20, 2018. An exit interview was held on July 20, 2018 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)
Kings County Human Services Agency	1400 West Lacey Blvd Hanford, CA	CalFresh, CalWORKs, In Home Supportive Services (IHSS), Children's Services	Spanish
Kings County Human Services Agency	520 Fresno St. Avenal, CA	CalFresh, CalWORKs	Spanish
Kings County Human Services Agency	951 Chittenden Ave. Corcoran, CA	CalFresh, CalWORKs	Spanish

## II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2018 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 civil rights coordinator
- Survey of program managers
- Case file reviews
- Facility inspections

- Discussion with community advocate groups. In this review the following organization(s) were contacted for feedback:

Central California Legal Services  
2115 Kern St., Ste. #1  
Fresno, CA 93721  
1-800-675-8001

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Program Accessibility for Clients with Disabilities (physical, mental, learning, visual or hearing impairment, etc.)
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

#### **Interviews Conducted of Public Contact Staff**

<b>Classifications</b>	<b>Total</b>	<b>Bilingual</b>
Eligibility Workers	3	3
Children Social Workers	2	2
Adult Program Workers	2	1
Receptionist/Screeners	1	1
<b>Total</b>	<b>8</b>	<b>7</b>

#### **Civil Rights Coordinator and Program Manager Surveys**

Number of surveys distributed: 6

Number of surveys received: 6

#### **Reviewed Case Files**

English speakers' case files reviewed: 8

Non-English or limited-English speakers' case files reviewed: 62

Languages of clients' cases: Tagalog, Spanish, Vietnamese, Portuguese, Cambodian, Arabic, American Sign Language (ASL)

Reasonable Accommodation cases reviewed: 0

Sections III through IX 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 civil rights compliance plan. Required corrective actions are stated at the end of each section.

Section X evaluates the County's Call/Service Centers services provided to non-English speaking clients and clients with a disability.

Section XI 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 XII highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XIII 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**

<b>Question (Please answer yes/no and provide response with comments.)</b>	<b>Comments</b>
Does the County accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	Yes. Applications can be mailed in and staff are allowed to flex their hours for early morning appointments or after-hours appointments, with prior supervisor approval.
Can clients, including those with disabilities, access services when they are unable to go to the office?	Yes. Clients can access the C4Yourself online system, Consortium IV (C-IV) Mobile App, and Kings County website, as well as call to have an application mailed to them, request interviews be completed over the phone, or request a home visit as an accommodation.

<b>Question (Please answer yes/no and provide response with comments.)</b>	<b>Comments</b>
Does the County ensure the awareness of available services individuals in remote areas?	Yes. There are out-stationed offices located in the cities of Corcoran and Avenal. Kings County participates in community events such as health and job fairs throughout the year. Staff are also out-stationed at the local hospital.

**B. Findings: Signage, Posters and Pamphlets**

<b>Question (Please answer yes/no and provide response with comments.)</b>	<b>Comments</b>
Does the County use the CDSS pamphlet "Your Rights under California Welfare Programs" (PUB 13)?	Yes. The PUB 13 is included in the application packet.
Is the pamphlet distributed and explained to each client at intake and re-certification?	Yes. The PUB 13 is explained to clients during their initial intake and at re-certifications.
Is the current version of PUB 13 available in Arabic, Armenian, Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukrainian, and Vietnamese?	Yes, all offices reviewed had the PUB 13 pamphlets available in their lobbies.
Were the current versions of the required posters present in the lobbies?	Yes. All required posters were present in the lobbies.
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?	Yes. Instructional and directional signs were posted in threshold language, Spanish.

**C. Corrective Actions: None.**

**D. Recommendation**

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

PUB 13 "Your Rights under California Welfare Programs" (08/16)  
PUB 86 "Everyone is Different, but Equal Under the Law" (03/07)  
Form AD 475B "And Justice for All" (12/15)



Contact the Civil Rights Unit to receive the most recent versions, or download the PUB 13 from the [Civil Rights Unit website](http://www.cdss.ca.gov/inforesources/Civil-Rights/Your-Rights-Under-California-Welfare-Programs) (<http://www.cdss.ca.gov/inforesources/Civil-Rights/Your-Rights-Under-California-Welfare-Programs>).

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

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The County must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

##### **A. Findings and Corrective Actions**

###### **1. Facility Location: 1400 West Lacey Blvd., Hanford, CA**

<b>Facility Element/Finding</b>	<b>Corrective Action</b>
Parking:  The right parking spot is missing the words “no parking” in the access aisle.	The words NO PARKING shall be painted on the surface of each access aisle. (CA T24 11B-502.3.3) California Accessibility Reference Manual (CARM) 2017 edition, page 166

Facility Element/Finding	Corrective Action
	This notice shall be painted in white letters a minimum of 12 inches in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3) CARM page 166
<p>Lobby:</p> <p>The PUB 13 audio is not available.</p>	<p>Pamphlets supplied by CDSS entitled Your Rights Under California Welfare Programs shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (example, cassette tapes, large print, etc.). (Division 21-107.221)</p>
<p>Client Interview Room:</p> <p>The turnaround pathway is less than 36 inches, measuring at 30 inches.</p>	<p>The turning space shall be a T-shaped space within 60 inches by 60 inches minimum square with arms and base 36 inches wide minimum. (CA T24 11B-304.3.2) CARM page 306</p>
<p>Women's Restroom:</p> <p>Toilet protector is high at 57 inches.</p>	<p>Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route. (CA T24 11B-603.5) CARM page 382</p> <p>All operable parts, including coin slots, shall be 40 inches maximum above the finish floor. (CA T24 11B-603.5) CARM page 382</p>

**Recommendation:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action chart above (Section A, 1).

## 2. Facility Location: 951 Chittenden Ave., Corcoran, CA

Facility Element/Finding	Corrective Action
<p>Lobby:</p> <p>The PUB 13 audio is not available.</p>	<p>Pamphlets supplied by CDSS entitled Your Rights Under California Welfare Programs shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (example, cassette tapes, large print, etc.). (Division 21-107.221)</p>
<p>Unisex Restroom:</p> <p>There is no proper signage on the wall for permanent identification.</p>	<p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall. (CA T24 11B-703.4.2) (ADA 703.4.2) CARM page 447</p>
<p>Drinking Fountain:</p> <p>Drinking fountain obstructs walking path in the hallway leading to the unisex restroom.</p>	<p>All drinking fountains shall be located completely within alcoves, positioned completely between wing walls, or otherwise positioned so as not to encroach into pedestrian ways. (CA T24 11B-602.9) CARM page 362</p> <p>The clear floor or ground space shall be 30 inches minimum by 48 inches maximum. (CA T24 11B-305.3) (ADA 305.3) CARM page 303</p> <p>Wall- and post-mounted cantilevered drinking fountains shall be 18 inches minimum and 19 inches maximum in depth. (CA T24 11B-602.8) CARM page 361</p>

**Recommendation:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action chart above (Section A, 2).

### 3. Facility Location: 520 E. Fresno St., Avenal, CA

Facility Element/Finding	Corrective Action
<p>Parking:</p> <p>The unauthorized parking signage at the entrance to off-street accessible parking is not posted.</p>	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8) CARM page 159</p> <p>The additional sign shall not be less than 17 inches wide by 22 inches high. (CA T24 11B-502.8.1) CARM page 159</p> <p>The additional sign shall clearly state in letters with a minimum height of 1 inch the following: Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____. (CA T24 11B-502.8.2) CARM page 159</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) CARM page 159</p>
<p>Parking lot:</p> <p>The entire parking lot is not accessible</p>	<p>Please refer to [insert name of section title here] at CA T24 11B-502, CARM pages 158-167 for guidance.</p>
<p>Main Entrance:</p> <p>Door pressure is high at 10 pounds.</p>	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> <li>1. Interior hinged doors and gates: 5 pounds maximum</li> <li>2. Sliding or folding doors: 5 pounds maximum</li> <li>3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 pounds. Exterior hinged doors: 5 pounds maximum. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 - 2)) CARM page 222</li> </ol>

Facility Element/Finding	Corrective Action
<p>Lobby:</p> <p>The PUB 13 audio, braille and large print is not available.</p>	<p>Pamphlets supplied by CDSS entitled Your Rights Under California Welfare Programs shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (example, cassette tapes, large print, etc.). (Division 21-107.221)</p>
<p>Unisex Restroom:</p> <p>Signage on the door is high at 65 inches and signage on the wall is high at 64 inches.</p>	<p>The International Symbol of Accessibility (Symbol) shall be mounted at 58 inches minimum and 60 inches maximum above the finish floor or ground surface measured from the centerline of the symbol. (CA T24 11B-703.7.2.6) CARM page 376</p>

**Recommendation:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action chart above (Section A, 3).

## 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 it 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, counties must ensure that written materials be available in individuals' primary languages if the forms and materials are provided by CDSS in that language, and that information inserted in notices of action (NOA) be in the individuals' primary language.

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

<b>Question: (Please answer yes/no and provide response with comments)</b>	<b>Comments</b>
Does the County identify a client's language need upon first contact? How?	Yes, via the Primary Language Form 90-9252.
Does the County use a primary language form?	Yes, Primary Language Form 90-9252.
Does the client self-declare on this form?	Yes. The client self-declares and fills out the form.
Are non-English- or limited- English-speaking clients provided bilingual services?	Yes. Kings County bilingual staff provide interpretive services and/or use telephone interpretive services (Language Line).
After it has been determined that the client is limited-English or non-English speaking, is there a County process for procuring an interpreter?	Yes. Kings County use bilingual staff to provide interpretive services and/or use Language Line.
Does the County have a contracted language line provider, a county interpreter list, or any other interpreter process?	Yes, Language Line.
Is there a delay in providing interpretive services?	There is no delay in providing interpretive services.
Are County interpreters certified?	Yes, County interpreters are certified by the County Human Resources Department.
Does the County have adequate interpreter services?	Yes, Kings County has adequate interpreter services.
Does the County allow minors to be interpreters? If so, under what circumstances?	Yes, but only in rare situations, and for the purpose of re-scheduling a future appointment with an interpreter available.
Does the County allow the client to provide his or her own interpreter?	Yes, clients are allowed to provide their own interpreters.
Does the County ensure that the client-provided interpreter understands what is being interpreted for the client?	Yes. If the client-provided interpreter appears to have difficulty understanding or communicating, staff may stop the interview and not proceed until they are able to

Question: (Please answer yes/no and provide response with comments)	Comments
	communicate effectively using a County-provided interpreter or Language Line.
If there is not a Release of Confidentiality Information form, how and where is the client-provided interpreter documented?	The client-provided interpreter used is documented in the case record.
Does the County use the CDSS-translated forms in the clients' primary languages?	Yes. Kings County is aware of and uses CDSS-translated forms.
Is the information that is to be inserted into NOA translated into the client's primary language?	Yes. The NOA information is translated into the client's primary language.
If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language?	Yes. Kings County bilingual staff will translate the necessary information on the NOAs. On occasion, when needed, Orchid Interpreting Inc. is an alternative option when County staff are unable to provide the translation.
Does the County provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the PUB 13)?	<p>Yes. Kings County has also obtained contracts with Language Line and Fox Interpreting Services to provide relay telephone services as well as provide interpreters for in-office visits with clients, upon request.</p> <p>Fox Interpreting and Orchid Interpreting Inc. provide translation services for notices in languages other than English and Spanish, as well as translating forms for clients.</p>
Does the County identify a client with a disability (physical, mental, or learning)?	Yes. The client's disability is documented in the case record, such as case comments or narrative tabs.
Does the County assist clients with self-identifying a disability?	No. Kings County staff will assist a client with a disability upon voluntary disclosure during an interview or initial contact.
Does the County have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?	No. Kings County does not have a policy and procedure in place for assisting clients with a disability.
Does the County offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	Yes, but only upon disclosure of disability and request for a reasonable accommodation.
Does the County identify and assist the client who has learning disabilities or a client who cannot read or write?	Yes. For clients who cannot read or write, staff stated they assist clients to fill out documents or read materials out-loud to clients.

Question: (Please answer yes/no and provide response with comments)	Comments
	A learning disability is only identified in the CalWORKs Welfare to Work program using the Learning Needs Screening (WTW 18) tool.
Does the County offer a screening for learning disabilities?	Yes. The Welfare to Work (WTW) program uses the Online CalWORKs Appraisal Tool (OCAT) screening.
Is there an established process for offering a screening?	Yes, only in the WTW program.
Is the client identified as having a learning disability referred for an evaluation?	Yes. Clients will be referred to community resources for further evaluation.

## B. Corrective Action

Area of Findings	Corrective Actions
Interpretive Services and Accessibility	Kings County shall ensure that administrative practices do not have the effect of denying non-English speaking persons and individuals with disabilities equal access to and participation in the available programs and activities. Division 21-115.3

**Recommendation:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action chart above (Section B).

## 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

### Non-Assistance CalFresh

Item	How item is Documented
Ethnic Origin	Application for CalFresh, C-IV Case Summary
Method of identifying client's primary language	C-IV Case Summary and Individual Demographics Page
Method of documenting client's primary language	C-IV Case Summary
Method of providing bilingual services and documentation	The Reviewer observed inconsistent documentation due to staff not documenting the method in the case file
Client provided own interpreter	No documentation found in cases reviewed as there were no client-provided interpreters used
Method to inform client of potential problem using own interpreter	No documentation found in cases reviewed as there were no client-provided interpreters used
Release of information to interpreter	No documentation found in cases reviewed as there were no client-provided interpreters used
Individuals acceptance or refusal of written material offered in primary language	C-IV Case Summary
Documentation of minor used as interpreter	None found in cases reviewed due to minors not being allowed to interpret
Documentation of circumstance for using minor interpreter temporarily	None found in cases reviewed due to minors not being allowed to interpret
Method of identifying client's disability	C-IV Case Journal
Method of documenting client's disability (physical, mental, or learning)	No documentation found in cases reviewed due to no reasonable accommodation requests being made by clients
Method of offering a reasonable accommodation to the client with a disability	No documentation found in cases reviewed due to no reasonable accommodation requests being made by clients
Method of documenting client's reasonable accommodation	No documentation found in cases reviewed due to no reasonable accommodation requests being made by clients

## Adult Programs (IHSS)

Item	How item is Documented
Ethnic Origin	Application for Social Services (SOC 873), Needs Assessment Form (SOC 293), Case Management, Information and Payrolling System (CMIPS) Person Home Page
Method of identifying client's primary language	Language Preference Form 90-9252
Method of documenting client's primary language	Language Preference Form 90-9252, SOC 293, CMIPS Case Narrative
Method of providing bilingual services and documentation	CMIPS Case Narrative
Client provided own interpreter	Release of Confidentiality Form 90-9368
Method to inform client of potential problem using own interpreter	Release of Confidentiality Form 90-9368
Release of information to interpreter	Release of Confidentiality Form 90-9368
Individuals acceptance or refusal of written material offered in primary language	CMIPS "blind or visually impaired" Tab
Documentation of minor used as interpreter	No documentation found in cases reviewed as there were no minors used as interpreters
Documentation of circumstance for using minor interpreter temporarily	No documentation found in cases reviewed as there were no minors used as interpreters
Method of identifying client's disability	CMIPS Screen for "blind or visually impaired" Tab
Method of documenting client's disability (physical, mental, or learning)	CMIPS "blind or visually impaired" Tab
Method of offering a reasonable accommodation to the client with a disability	CMIPS Case Narrative
Method of documenting client's reasonable accommodation	No documentation found in cases reviewed due to no reasonable accommodation requests being made by clients

## CalWORKs

Item	How item is Documented
Ethnic Origin	C-IV Case Summary and Individual Demographics Page
Method of identifying client's primary language	Language Preference Form 90-9252
Method of documenting client's primary language	C-IV Case Summary and Individual Demographics Page
Method of providing bilingual services and documentation	The Reviewer observed inconsistent documentation due to staff not documenting in case file
Client provided own interpreter	No documentation found in cases reviewed as there were no client-provided interpreters used
Method to inform client of potential problem using own interpreter	No documentation found in cases reviewed as there were no client-provided interpreters used
Release of information to interpreter	No documentation found in cases reviewed as there were no client-provided interpreters used
Individuals acceptance or refusal of written material offered in primary language	C-IV Case Summary
Documentation of minor used as interpreter	No documentation found in cases reviewed as there were no minors used as interpreters
Documentation of circumstance for using minor interpreter temporarily	No documentation found in cases reviewed as there were no minors used as interpreters
Method of identifying client's disability	C-IV Case Journal
Method of documenting client's disability (physical, mental, or learning)	No documentation found in cases reviewed due to no reasonable accommodation requests being made by clients
Method of offering a reasonable accommodation to the client with a disability	No documentation found in cases reviewed due to no reasonable accommodation requests being made by clients
Method of documenting client's reasonable accommodation	No documentation found in cases reviewed due to no reasonable accommodation requests being made by clients

## CalFresh Fraud

Item	How item is Documented
Ethnic Origin	C-IV Case Summary
Method of identifying client's primary language	C-IV Case Summary and Individual Demographics Page

Item	How item is Documented
Method of documenting client's primary language	C-IV Case Summary and Individual Demographics Page
Method of providing bilingual services and documentation	Reviewer identified a lack of documentation due to bilingual staff not documenting in case file
Client provided own interpreter	No interpretive services documentation found in cases reviewed because bilingual investigators were identified
Method to inform client of potential problem using own interpreter	No interpretive services documentation found in cases reviewed because bilingual investigators were identified
Release of information to interpreter	No interpretive services documentation found in cases reviewed because bilingual investigators were identified
Individuals acceptance or refusal of written material offered in primary language	C-IV Case Summary
Documentation of minor used as interpreter	No documentation found in cases reviewed as there were no minors used as interpreters
Documentation of circumstance for using minor interpreter temporarily	No documentation found in cases reviewed as there were no minors used as interpreters
Method of identifying client's disability	C-IV Case Journal
Method of documenting client's disability (physical, mental, or learning)	No documentation found in cases reviewed as there were no clients with a disability
Method of offering a reasonable accommodation to the client with a disability	No documentation found in cases reviewed due to no reasonable accommodation requests made by clients
Method of documenting client's reasonable accommodation	No documentation found in cases reviewed due to no reasonable accommodation requests being made by clients

## Children's Services

Item	How item is Documented
Ethnic Origin	Child Welfare Services-Case Management System (CWS-CMS) ID Page, Emergency Response Referral Information (IN-ERREFR) Form
Method of identifying client's primary language	CWS-CMS Case Transfer Summary Page, IN-ERREFR

Item	How item is Documented
Method of documenting client's primary language	CWS-CMS ID Page
Method of providing bilingual services and documentation	CWS-CMS Case Narrative and Delivered Services Log
Client provided own interpreter	None found in cases reviewed due to no client-provided interpreter used
Method to inform client of potential problem using own interpreter	None found in cases reviewed due to no client-provided interpreter used
Release of information to interpreter	None found in cases reviewed due to no client-provided interpreter used
Individuals acceptance or refusal of written material offered in primary language	CWS-CMS Case Narrative and Delivered Services Log
Documentation of minor used as interpreter	None found in cases reviewed due to minors not being allowed to interpret
Documentation of circumstance for using minor interpreter temporarily	None found in cases reviewed due to minors not being allowed to interpret
Method of identifying client's disability	CWS-CMS Case Narrative
Method of documenting client's disability (physical, mental, or learning)	CWS-CMS Case Narrative
Method of offering a reasonable accommodation to the client with a disability	No documentation found in case reviewed due to no reasonable accommodation requests being made by clients
Method of documenting client's reasonable accommodation	No documentation found in case reviewed due to no reasonable accommodation requests being made by clients

## B. Corrective Action

Areas of Action	Corrective Action
Documentation that bilingual services were provided	Document the method used to provide bilingual services, for example, assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Division 21-116.22
General	Kings County must ensure that proper and consistent documentation is kept in the file that identifies all the required elements to ensure and demonstrate compliance. Division 21-116

**Recommendation:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action chart above (Section B).

## VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights, cultural awareness, Section 504 of the Rehabilitation Act of 1973 (Section 504), and ADA 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: (Please answer yes/no and provide response with comments)	Comments
Are employees trained in the requirement of Section 504 and ADA?	No. Staff interviewed were not aware and have not been provided with Section 504 and ADA training.
Do employees receive continued Division 21 Training?	Yes. Division 21 training is provided annually through UC Davis.
Do employees understand the County policy regarding a client's rights and procedure to follow when receiving a discrimination complaint?	Yes. All staff interviewed stated they are aware of and contact Heather Shannon, Civil Rights Coordinator.
Does the County provide employees Cultural Awareness Training?	Yes. All staff interviewed stated they receive cultural awareness training during the Division 21 training.
Do the CSW's have an understanding of Multi-Ethnic Placement Act (MEPA)?	Yes. The Children Services Workers interviewed stated they all understand and have gotten MEPA training.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	Yes. All staff interviewed are knowledgeable about the predominant cultural groups in their area.
Does the County provide training on how to identify clients with disabilities (physical, mental & learning)?	No training is provided for staff on how to identify clients with disabilities.
Do employees receive training on reasonable accommodation for clients with disabilities?	No training is provided for staff on reasonable accommodation for clients with disabilities.
Do the employees understand the County policy regarding a client's right to a reasonable accommodation?	Kings County does not have a reasonable accommodation policy in place.

## B. Corrective Actions

Training Area	Corrective Action
Section 504 and ADA training	Kings County shall provide Section 504 and ADA training to all public contact employees to ensure non-discrimination on the basis of disability. Title II of the ADA, 28 CFR 35.130, All County Letter 19-45

**Recommendation:** Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action chart above (Section 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's responsibility to maintain this log.

### A. Findings from Staff Interviews, Civil Rights Coordinator, and Program Manager Surveys

Interview and Review Areas: (Please answer yes/no and provide response with comments)	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	Yes. Staff interviewed were able to identify the differences between all three complaints.
Do the employees know who the Civil Rights Coordinator is?	Yes. All staff interviewed identified Shannon Heather as the Civil Rights Coordinator.
Do the employees know the location of the Civil Rights poster "Everyone is Equal... (PUB 86)" with information as to how and where the clients can file a discrimination complaint?	Yes. All staff indicated posters were available in the lobby.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	Yes.

### B. Corrective Actions: None.

**Recommendation:** None.

## IX. VENDOR CONTRACTS

Counties are required to ensure contracted services with contractors, vendors, consultants, and other providers of service, who receive state or federal assistance, include the assurance of compliance agreement.

### A. Contracts Review

Number of Contracts Reviewed	9
Number of Contracts with an Assurance of Compliance Agreement	9

### B. Corrective Action: None.

**Recommendation:** Please update the Assurance of Compliance Agreements with all contractors as well as the County Assurance of Compliance to include all current bases. Several bases are missing, such as Ethnic Group Identification, Sexual Orientation, Domestic Partnership, Gender Identity, Gender Expression. Kings County may refer to the GEN 1179, Discrimination Complaint Form, for a list of all bases.

## X. CALL CENTER EVALUATION

County Call/Service Centers are evaluated to ensure services provided are nondiscriminatory toward non-English speaking clients and clients with a disability (physical, mental, or learning).

### A. Findings from Call/Service Center site visit and interviews

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County have a Call Center/Service Center?	Yes, Kings County operates a Customer Call Center.
Is the Call Center/Service Center Publicly accessible to clients?	There is no public access to the call center.
Does the Call Center/Service Center answer calls for the entire County, by district, or regional office?	The Customer Call Center answers calls for the entire County.
Does the Call/Service Center have an Interactive Voice Response system?	Yes, Call Center has an interactive voice response system.
If so, does the Interactive Voice Response system have language options for all County threshold languages?	Yes, Spanish is available.
Does the Interactive Voice Response system have an option to request free interpretive services?	Yes.



<b>Question: (Please answer yes/no and provide response with comments)</b>	<b>Comments</b>
Is the Call/Service Center accessible to clients with a disability (hearing impaired, physical, mental, or learning)?	Yes.
Does the Call/Service Center accommodate clients with a disability (physical, mental, or learning)?	Yes.
Are the Call/Service Center calls monitored for quality assurance?	Yes, supervisors have the capability to tap into lines with "listen live" to monitor calls.
Does the Call/Service Center staff provide services to client's individual case?	Yes. CalFresh application interviews can be conducted over the phone with the option for clients to submit e-signatures.
Does the Call/Service Center staff identify and document the client's preferred language?	Yes. All staff interviewed stated they have direct access to client case files and can document the client's preferred language.
Does the Call/Service Center staff document the method of providing bilingual interpretive services?	Yes.

**B. Corrective Action:** None.

**Observation:** None.

## **XI. COMMUNITY INPUT**

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups.

Feedback was sought from Central California Legal Services. No response/input was received.

## **XII. 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 augmentations to your plan:

### **1. Section II. Assignment of Resources:**

- Provide the Kings County HSA conflict of interest policy regarding employees conducting investigations as specified in Division 21, Section 203.3.

2. Section V. Services to Non-English-Speaking, Limited-English-Proficient and Disabled Applicants/Recipients:

- Provide the Kings County HSA policies and procedures for offering free interpreter services and auxiliary aids as specified in Division 21, Section 115.
- Provide the Kings County HSA policies and procedures to identify a client's disability (physical or mental) and how to provide a reasonable accommodation as specified in All County Letter 19-45 and Division 21 Section 115.
- Provide the Kings County HSA policies and procedures regarding when it is inappropriate to allow clients to use their own interpreters, as well as the policies and procedures for when clients may be allowed to use their own interpreters, including the limited circumstances under which a client is allowed to exclusively use their own interpreter, when the County provides its own interpreter in addition to the client's interpreter, under what extenuating conditions clients would be allowed to temporarily use minors as interpreters, how interpreter competency is verified, and how confidentiality of the interpreter is ensured as specified in Division 21, Section 115.
- Provide the Kings County HSA procedures, if any, for capturing and reporting statistics regarding the number of cases, by program, of individuals who are identified (self-identified or otherwise identified) as having a disability as specified in Division 21, Section 115.

3. Section VI. Documentation of Applicants'/Recipients' Case Records:

- Provide the Kings County HSA policies and procedures for documentation in applicants'/recipients' case files as specified in Division 21, Section 116.

4. Section XII. Discrimination Complaint Procedure:

- Provide the Kings County HSA updated Discrimination Complaint policies and procedures as specified in Division 21, Section 203.

Please submit these items with your CAP for this review.

### **XIII. CONCLUSION**

The CDSS Reviewer found the Kings County Human Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Heather Shannon, Civil Rights Coordinator, for organizing the details of the review, and to Lupe Villa, Facilities Manager, who assisted in each of the facility reviews. In each office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Kings County Human Services Agency in partial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County

staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The Kings County Human Services Agency must remedy the deficiencies identified in this report by taking corrective actions. A CAP 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 CDSS' intent that this report be used to create a positive interaction between the County and CDSS to identify and correct compliance violations and to provide the County with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights Unit staff is available to provide technical assistance as requested.