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

January 25, 2013

Ms. Pat Cheadle, Director
Kern County Department of Human Services
100 E. California Avenue
P.O. Box 511
Bakersfield, CA 93307

Dear Ms. Cheadle:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office, Cindy Guzman during the course of the Civil Rights Compliance Review of October 1 – 5, 2012. 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 sixty days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, they 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 the Civil Rights Bureau at (916) 654-2107. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

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

Enclosure

c: Ginny Krebs, Civil Rights Coordinator
Cari Drake, Assistant Program Director

**Linda Patterson, Branch Chief
CDSS CalFresh Program**

**Mike Papin, Chief
CalFresh Policy Bureau**

**Marlene Fleming, Chief
Field Operations Bureau**

**Brian Tam, Chief
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**Paul Gardes
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**Jodie Berger, Regional Counsel
Legal Services of Northern California**

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
KERN COUNTY DEPARTMENT OF HUMAN SERVICES**

**Conducted on
October 1 – 5, 2012**

**California Department of Social Services
Human Rights and Community Services Division**

Civil Rights Bureau

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

Sacramento, CA 95814

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Reviewer

Cindy Guzman

TABLE OF CONTENTS

- I. INTRODUCTION
- II. SUMMARY OF METHODOLOGY
- III. DISSEMINATION OF INFORMATION
- IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES
- V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES
- VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS
- VII. STAFF DEVELOPMENT AND TRAINING
- VIII. DISCRIMINATION COMPLAINT PROCEDURES
- IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL
- X. CONCLUSION

CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

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

An on-site compliance review was conducted on October 1 – 4, 2012. An exit interview was held on October 5, 2012 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)
Delano	1816 Cecil Avenue Delano, CA	CalFresh WTW	Spanish
Lake Isabella	7050 Lake Isabella Blvd. Lake Isabella, CA	CalFresh WTW	Spanish
Taft	315 Lincoln Avenue Taft, CA	CalFresh WTW	Spanish
Bakersfield Call Center	3041 Wilson Road Bakersfield, CA	CalFresh	Spanish
Adoptions Facility (The Wilson Road Adoptions Facility was a drop in facility review. The case files were not reviewed at this time).	3041 Wilson Road Bakersfield, CA	Adoptions	Spanish
O.C. Sills Building – Hearing Room Review	100 E. California Avenue Bakersfield, CA	N/A	Spanish

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2010 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

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

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

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

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	6	4
Receptionist/Screeners	4	3
Total	10	7

An additional three interviews were scheduled but were not conducted due to staff unavailability.

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	13
Non-English or limited-English speakers' case files reviewed	50
Languages of clients' cases	English, Spanish, Russian, Arabic, Punjabi, Vietnamese, Arabic, Thai,

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

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

III. DISSEMINATION OF INFORMATION

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

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Applications can be mailed in, submitted online through C4 yourself, drop boxes outside the office and by telephone. Office hours are 8 – 5. Accommodations can be arranged by appointment.
Does the county have extended	X			Extended hours to

hours to accommodate clients?				accommodate clients can be arranged by appointment if needed.
Can applicants access services when they cannot go to the office?	X			Through the mail, online through C4 yourself, drop boxes outside the office and by telephone.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Through community based organizations. Through the internet website (www.DHS.com), and by contacting one of the 7 district offices located throughout the county.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)?	X			
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			The Pub 13 is distributed and explained to each client at intake and re-certification.
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?	X			
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?	X			
Was the Pub 13 available in large print (English and Spanish),			X	Adoptions Facility– 3041 Wilson Road,

Signage, posters, pamphlets	Yes	No	Some-times	Comments
audiocassette and Braille?				Bakersfield, did not have the Pub 13 available in large print (English and Spanish) audiocassette and Braille.
Were the current versions of the required posters present in the lobbies?	X			
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			

B. Corrective Actions

Informational Element	Corrective Action Required
Auxiliary aids	Kern 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

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

Pub 13	"Your Rights under California Welfare Programs"	06/11
Pub 86	"Everyone is Different, but Equal under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact the Civil Rights Bureau to receive the most recent versions, or download the Pub 13 from the CRB website http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

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

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

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

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

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

A. Findings and Corrective Actions

1. Facility Location: Delano, 1816 Cecil Avenue, Delano, CA

Facility Element	Findings	Corrective Action
Parking	PUBLIC SHARED PARKING	None
Exterior entrance	Double Door Pressure	The maximum force required to

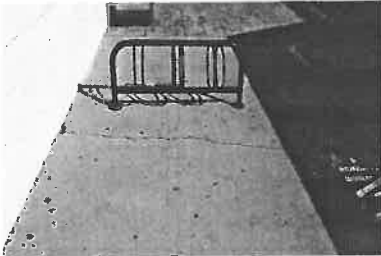
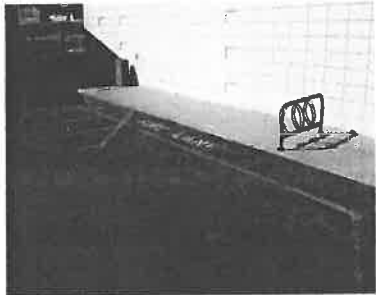
	too high at 9 lbs.	push or pull open a door shall comply with the following: Exterior Door: 5 pounds of force max. Pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(A)) p 207
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2. Facility Location: Lake Isabella, 7050 Lake Isabella, Blvd., Lake Isabella, CA

Facility Element	Findings	Corrective Action
Parking	Missing additional signage or additional language below the symbol of accessibility "minimum Fine \$250" on the one space next to the Van Accessible space.	An additional sign or additional language below the symbol sign of accessibility shall state "Minimum Fine \$250" (CA T24 1129B.4) p 134
Entrance	Door pressure too high at double entrance doors. Left high at 11 lbs., Right high at 15 lbs.	The maximum force required to push or pull open a door shall comply with the following: Exterior Door: 5 pounds of force max. Pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(A)) p 207
Interview Rooms	Client Interview room too small for turnaround in 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

3. Facility Location: Taft, 315 Lincoln Avenue, Taft, CA

Facility Element	Findings	Corrective Action
Exterior entrance	Safe path of travel,	Walks and sidewalks shall have

	<p>sidewalk has interruption of bike rack in the middle of walkway. (See Photo Below A1 and A2)</p> <p>Photo A1</p>  <p>Photo A2</p>  <p>Door pressure too high at double entrance doors. Left door high at 15 lbs., Right door high at 16 lbs.</p>	<p>a continuous common surface not interrupted by steps or abrupt level changes exceeding 1/2"</p> <p>(CA T24 1133B.7.1.) (ADA 4.3.8) p 167</p> <p>Walkways min. width is 48". (CA T24 1133B.7.1) p 167</p> <p>Walks and sidewalks shall have a continuous common surface not interrupted by steps or abrupt level changes exceeding 1/2"</p> <p>(CA T24 1133B.7.1) (ADA 4.3.8) p 167</p> <p>The maximum force required to push or pull open a door shall comply with the following:</p> <p>Exterior Door: 5 pounds of force max. Pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(A)) p 207</p>
<p>Men's Restroom</p>	<p>Door pressure too high at 8 lbs.</p>	<p>The maximum force required to push or pull open a door shall comply with the following:</p>

		<p>Exterior Door: 5 pounds of force max. Pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(A)) p 207</p> <p>Interior Door: 5 pounds of force max. Pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)) (B)) p 207</p>
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4. Facility Location: Adoptions Facility– 3041 Wilson Road, Bakersfield, CA
 (The Wilson Road Adoptions Facility was a drop in facility review. The case files were not reviewed at this time).

Facility Element	Findings	Corrective Action
Parking	SHARED PARKING	N/A
Entrance	No accessible signage with the international symbol of accessibility at entrance.	<p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction where the accessible route of travel diverges from the regular circulation path along or leading to an accessible route of travel, entrance or facility.</p> <p>(CA T24 1127B.3) p 191 The International Symbol of Accessibility shall be the standard used to identify facilities that are accessible to and usable by physically disabled persons as set forth in these building standards and as specifically required in this section.</p> <p>(CA T 24 117B.5.8.1) (ADA 4.1.2(7)) p 400 Signs shall indicate the direction to accessible building</p>

	<p>No accessible signage with the international symbol of accessibility at entrance non-glare finish, color contrast.</p> <p>Entrance Door too heavy at 19 lbs.</p> <p>Pub 13 was not available in large print, braille or audio.</p>	<p>entrances and facilities, (CA T24 1117B.3) p 191, 400</p> <p>Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2) (ADA 4.30.5) p 403</p> <p>The maximum force required to push or pull open a door shall comply with the following:</p> <p>Exterior Door: 5 pounds of force max. Pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(A)) p 207</p> <p>Interior Door: 5 pounds of force max. Pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)) (B)) p 207</p> <p>Fire Door: Min. allowable by administrative authority, not to exceed 15 pounds of force max. (CA T24 1133B.2.5) (ADA 4.13.11(1)) p 207</p> <p>Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all CWD waiting rooms and</p>
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		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 (e.g., cassette tapes, large print, etc.). (Div 21-107.221)
Men's Restroom	<p>No accessible signage on the wall adjacent to the latch side of the door.</p> <p>Door pressure too high at 9 lbs.</p>	<p>Door sign and wall sign shall be 60" above the floor to the center line of sign.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7) (ADA 4.30.6) p 287</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207</p>
Women's Restroom	No accessible signage on the wall adjacent to the latch side of the door.	<p>Door sign and wall sign shall be 60" above the floor to the center line of sign.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf</p>

	<p>Door pressure too high at 10 lbs.</p>	<p>doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7) (ADA 4.30.6) p 287</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207</p>
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5. Facility Location: Bakersfield – Call Center. (No Public Access)

There was not a facility ADA Review for this location due to no public access.

Call center takes calls and processes tasks as needed to complete the case actions such as adding a baby, address change, answering questions about case status, issuing replacement BIC or EBT card after validating the caller and more. They can process any task that takes less than 15 minutes to ensure that they are available for the next call. If a task takes more than 15 minutes they will pend the case and send to the processing team to complete the more time consuming or complex actions.

The processing teams take care of all normal daily operations such as QR 7's, MSR's, Renewals, Phone Interviews, Applications, MEDS alerts, Bridging and more.

The call center does not do face to face contact that is handled by a team of workers in the District Offices and OC Sills.

The client can identify their language thru the automated system prior to reaching an agent and the call will be directed to a Spanish speaking client as they are available. If the client speaks another language, the call center agency can access the language line to assist the client.

6. Facility Location: O.C. Sills Building –Hearing Room Review, 100 E. California Avenue, Bakersfield, CA

Facility Element	Findings	Corrective Action
Main Entrance	Main entrance double	The maximum force required to

	<p>doors too heavy. Left door heavy at 16 lbs., Rights door heavy at 26 lbs. (Right door hard to open)</p> <p>Inside door heavy at 9 lbs.</p>	<p>push or pull open a door shall comply with the following:</p> <p>Exterior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(A)) p 207</p> <p>Interior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)) (B)) p 207</p>
Men's Restroom	Door too heavy at 15 lbs.	<p>The maximum force required to push or pull open a door shall comply with the following:</p> <p>Exterior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(A)) p 207</p> <p>Interior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)) (B)) p 207</p>
Woman's Restroom	Door too heavy at 10 lbs.	<p>The maximum force required to push or pull open a door shall comply with the following:</p> <p>Exterior Door: 5 pounds of force max. Pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(A)) p 207</p> <p>Interior Door: 5 pounds of force max. pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)) (B)) p 207</p>

<p>Client Hearings Rooms</p>	<p>No sign of accessibility on door entrances of Hearings Room A, and Hearings Room B.</p>	<p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction where the accessible route of travel diverges from the regular circulation path along or leading to an accessible route of travel, entrance or facility.</p> <p>(CA T24 1127B.3) p 191 The International Symbol of Accessibility shall be the standard used to identify facilities that are accessible to and usable by physically disabled persons as set forth in these building standards and as specifically required in this section.</p> <p>(CA T 24 117B.5.8.1) (ADA 4.1.2(7)) p 400 Signs shall indicate the direction to accessible building entrances and facilities, (CA T24 1117B.3) p 191, 400</p>
	<p>Turnaround in Hearings Room A and Hearings Room B are too small for wheelchair turn around. Rooms are 9 ft. 6 inches wide. With table and chairs, there is 25" from table to wall.</p>	<p>Wheelchair Turning Space is a minimum space for a wheelchair to turn 180 degrees in a 60" diameter or T-shaped space.</p> <p>(CA T24 1118B.3, ADA 4.2.3) p 236</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 (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

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

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			County identifies the client's language need upon first contact through I speak cards, and asking them. The county uses the KCDHS "Documentation of Language Services: Form and the client's primary language is coded in C-IV to identify the client's language needs.
Does the county use a primary language form?	X			The county uses the KCDHS "Documentation of Language Services" Form.
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Clients are assigned to workers using their primary language. Spanish cases are assigned to Spanish speaking staff. The county also uses a language line.

Question	Yes	No	Some-times	Comments
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			Clients are assigned to workers using their primary language. Spanish cases are assigned to Spanish speaking staff. The county also uses a language line.
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			The county has a language line provider, a county interpreter list and they also assign clients to bilingual workers.
Are county interpreters determined to be competent?	X			The county has certified interpreters, as well as bilingual workers when needed.
Does the county have adequate interpreter services?	X			
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			The county has the client fill out the KCDHS Waiver of Right to Free Interpreter Services Form. (KCDHS 440-Gen.)
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			The county has the client fill out the KCDHS Waiver of Right to Free Interpreter Services Form. (KCDHS 440-Gen.)
Does the county use the CDSS-translated forms in the clients' primary languages?	X			

Question	Yes	No	Sometimes	Comments
Is the information that is to be inserted into NOA translated into the client's primary language?	X			
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			County documents in journal entry any accommodations the client may have. It was noted in journal when client needed assistance, and how they provided it.
Does the county offer screening for learning disabilities?	X			Screening would be done through Welfare to Work.
Is there an established process for offering screening?	X			Screening would be done through Welfare to Work.
Is the client identified as having a learning disability referred for evaluation?	X			Screening would be done through Welfare to Work.

B. Corrective Actions/None

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

Note: (The Wilson Road Adoptions Facility was a drop in facility review. The case files were not reviewed at this time).

Documented Item	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	SAWS 1	SAWS 1
Primary language documentation	SAWS 1;KCDHS 439	SAWS 1;KCDHS 439
Method of providing bilingual services and documentation	Kern county assigns clients to bilingual workers or uses the language line if needed.	Kern county assigns clients to bilingual workers or uses the language line if needed.
Client provided own interpreter	Kern county uses the KCDHS Waiver of Right to Free Interpreter Services. (KCDHS 440-Gen.)	Kern county uses the KCDHS Waiver of Right to Free Interpreter Services. (KCDHS 440-Gen.)
Method to inform client of potential problem using own interpreter	Kern county uses the KCDHS Waiver of Right to Free Interpreter Services. (KCDHS 440-Gen.)	Kern county uses the KCDHS Waiver of Right to Free Interpreter Services. (KCDHS 440-Gen.)
Release of information to Interpreter	KCDHS 440-Gen	KCDHS 440-Gen
Individual's acceptance or refusal of written material offered in primary language	KCDHS 430-Gen	KCDHS 430-Gen
Documentation of minor used as interpreter	None Noted in case file samples. Would be in case journal.	None Noted in case file samples. Would be in case journal.
Documentation of circumstances for using	None Noted in case file samples. Would be in	None Noted in case file samples. Would be in

Documented Item	CalWORKs & Employment Services	Non-Assistance CalFresh
minor interpreter temporarily	case journal.	case journal.
Translated notice of actions (NOA) contain translated inserts	Yes	Yes
Method of identifying client's disability	None Noted in case file samples. Would be in case journal.	None Noted in case file samples. Would be in case journal.
Method of documenting a client's request for auxiliary aids and services	Noted in case Journal client needs assistance with writing. Good Documentation on how worker assisted client.	None noted in case file samples. Would be in case journal.

B. Corrective Actions/None

II. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural	X			

Awareness Training?				
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions/None

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

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

Interview and review areas	Yes	No	Some-times	Findings
complete and up to date?				

B. Corrective Action/None

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Kern County Department of Human Services Civil Rights Compliance Plan for the period September 1, 2012 through August 31, 2013 was received on July 1, 2012. It is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the Kern County Department of Human Services staff warm, welcoming, informative and very supportive. Particular thanks to Ginny Krebs, Civil Rights Coordinator, and Cari Drake, Assistant Program Director for organizing the details of the review, and to all those who assisted in each of the facility reviews. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Kern County Department of Human Services in substantial 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 Kern County Department of Human Services must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.