



STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



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September 13, 2010

Peggy Montgomery, Director
Kings County Human Services Agency
Kings County Government Center
1400 W. Lacey Blvd.
Hanford, CA 93230-5962

Dear Ms. Montgomery:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of June 16-18, 2009. Enclosed is the final report on the review. We apologize for the delay.

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

We will provide a copy of our report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it too, becomes a public document. Per the Governor's Executive Order S-08-09, all compliance reviews (and corresponding CAPs) performed after January 2008 will be posted on the state's Reporting Government Transparency website.

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, Acting Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Lupe Villa, Civil Rights Coordinator

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
KINGS COUNTY HUMAN SERVICES AGENCY
Conducted
On
June 16-18, 2009**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
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Reviewer

Elsa Garcia

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the 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 June 16-18, 2009. An exit interview was held on June 18, 2009, to review the 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, Bldg 8, Hanford, CA 93230	NAFS, IHSS, Children Services	Spanish
Avenal Satellite Office	520 Fresno Street Avenal CA 93204	Employment Services	Spanish
Corcoran Satellite Office	951 Chittenden Avenue Corcoran, CA 93212	CalWORKS, NAFS	Spanish

II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2009 Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- 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	9	7
Children Social Workers	2	1
Adult Program Workers	1	1
Receptionist/Screeners	2	2
Total Interviewed	14	

Program Manager Surveys

Number of surveys distributed	3
Number of surveys received	3

Reviewed Case Files (Total cases reviewed 71)

English speakers' case files reviewed	17
Non-English or limited-English speakers' case files reviewed	54
Languages of clients' cases	Spanish, Cambodian, and Portuguese

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 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			Clients can mail, fax or telephone application.
Does the county have extended hours to accommodate clients?	X			Clients can make arrangements with their worker before or after normal business hours.
Can applicants access services when they cannot go to the office?	X			Clients can access via the county website, mail, fax, and telephone. Arrangements could be made for a home visit.
Does the county ensure the awareness of available services for individuals in remote areas?	X			There are outstation workers who travel to the remote areas, and a mobile worker who travels to the Family Resource Centers throughout the county. The county staffs the two county hospitals with an outstation worker.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under	X			Staff provides the Pub 13 at initial contact,

Signage, posters, pamphlets	Yes	No	Some-times	Comments
California Welfare Programs” (Pub 13)? Is the pamphlet distributed and explained to each client at intake and re-certification?				and at recertification.
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?	X			
Was the Pub 13 available in large print, audiocassette and Braille?	X			All sites reviewed had the auxiliary aides available.
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			Staff interviewed knew the location of the required posters and knew who their Civil Rights Coordinator is.
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			There was excellent instructional and directional signage in the threshold language.

The most recent version for each of the above referenced documents is:

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

Contact your program consultant 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.

A. Findings and Corrective Actions

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

A1. Facility Location: 520 Fresno Street, Avenal

Facility Element	Findings	Corrective Action
Parking	*This is a repeat finding from 2007. There is no "unauthorized parking" signage at entrance to off-street accessible 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

	<p>There is no International Sign of Accessibility (ISA) signage on freestanding pole at the front of each accessible parking space.</p> <p>No "Minimum Fine" signage below the ISA sign.</p>	<p>at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p 133</p> <p>Each parking space for persons with disabilities shall be identified by a reflectorized sign permanently posted adjacent to and visible from each stall or space, consisting of the International Symbol of Accessibility in white on dark blue background.</p> <p>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</p> <p>For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133</p>
Main Entrance	Force to open door is excessive at 8 lbs.	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 201

B. Corrective Action

There is a repeat finding from the 2007 review at the Avenal office. This should be addressed in the corrective action plan.

A2. Facility Location: 951 Chittenden, Corcoran

Facility Element	Findings	Corrective Action
Main entrance	Force to open door is excessive at 10 lbs.	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 201
	Bottom of door (except auto & sliding) does not have a smooth, uninterrupted surface that allows door to open by wheelchair foot-rest.	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
Client lobby	The lobby counter is too high at 42", there is no accessible counter.	Height of accessible tables or counters is between 28" – 34" from floor finish. (CA T24 1122B.4, ADA 4.32.4) p 388
Unisex 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.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 281</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 282</p>

	<p>Urinal is too high at 26".</p>	<p>Rim height shall be a maximum of 17" in height above the floor. (CA T24 1115B.4.2.1) p 285</p> <p>Urinals: Where there are urinals provided, at least one (1) shall provide a clear floor space of 30" wide x 48" deep in front of the urinal to allow for a forward approach. This clear space may extend 6" maximum under the urinal if the urinal has a 9" minimum toe clearance from the floor to the urinal's bottom. (CA T24 1115B.4.2.3, ADA 4.18.3 & 4.22.5) p 285</p>
	<p>Sink rim and/or counter is too high at 35".</p> <p>Pipes under sink are not securely insulated.</p>	<p>Sink is mounted with a counter or rim no higher than 34". (CA T24 1115B.4.7.1, ADA 4.24.2) p 342</p> <p>Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.4.7.1, ADA 4.24.6) p 343</p>

A3. Facility Location: 1400 W. Lacey Blvd, Hanford

Facility Element	Findings	Corrective Action
<p>Parking</p>	<p>Accessible spaces are not in compliance with regulations. The freestanding signs do not have the proper ISA signage.</p>	<p>Each parking space for persons with disabilities shall be identified by a reflectorized sign permanently posted adjacent to and visible from each stall or space, consisting of the International Symbol of Accessibility in white on dark blue background.</p> <p>Sign height shall be 80" minimum from bottom of sign to</p>

	<p>No "Minimum Fine" signage below the symbol sign.</p> <p>Persons with disabilities are forced to go behind parked cars.</p> <p>Access aisle did not connect to the path of travel.</p>	<p>top of finish grade. (CA T24 1129B.4.1, ADA 4.6.5) p 134</p> <p>For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133</p> <p>Persons with disabilities shall not be forced to go behind parked cars except their own. (CA T24 1129B.3.3) (<i>hardship exception, p 134</i>)</p> <p>Access aisles (load and unload) must connect to the accessible path of travel, including curb cuts or ramps as needed. (CA T24 1129B.3.3, ADA 4.6.3) p 135</p> <p>Walkways minimum 48". (CA T24 1133B.7.1) p 160</p>
Main entrance	Force to open doors is excessive at 15 lbs.	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 201
Drinking Fountain	Fountain did not have the knee space required.	The clear knee space between the bottom of the apron and the floor or ground not less than 27" in height, 30" in width, and 8" in depth. (CA T24 1117B.1.2, ADA 4.15.5(1)) p 231
Men's Restroom	<p>Force to open door is excessive at 10 lbs.</p> <p>Soap dispenser is too high @ 48".</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 201</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal</p>

	Paper towel dispenser is too high at 48".	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
Women's Restroom	Force to open doors is excessive at 15 lbs and 13 lbs (two doors). Pipes under sink are not securely insulated. Soap dispenser is too high at 48". Mirror base is too high at 47". Paper towel dispenser is too high at 49".	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 201 Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.4.7.1, ADA 4.24.6) p 343 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, <u>at a maximum height of 40"</u> . (CA T24 1115B.8.3, ADA 4.23.7) p 294 Mirror base at 40" maximum.

NOTE: Due to construction of the new Human Services Agency building immediately next door, the parking lot is also under construction. It was brought to the attention of the reviewer that once construction is completed all the accessible parking spaces will be in compliance.

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			Clients are asked to complete a Language Preference Form at initial contact.
Does the county use a primary language form?	X			Document of Language Preference Form 90-9252.
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			
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			Assignment of non-English-speaking applicants/recipients is coordinated with one clerical person.
Is there a delay in providing services?		X		

Question	Yes	No	Some-times	Comments
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			The Agency utilizes a Language Line Telephone Interpretation Service, a bilingual interpreter lists.
Are county interpreters determined to be competent?	X			Staff is deemed competent through a certification process. Oral and written testing used to qualify applicants for bilingual positions within the Agency.
Does the county have adequate interpreter services?	X			Each unit of public contact staff has sufficient bilingual capacity to meet the needs of the Spanish-speaking applicant/recipient population.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		Use of minors would be used in rare emergency situation only. To reschedule an appt. for a later date, pending a professional interpreter. The worker must document the situation.
Does the county allow the client to provide his or her own interpreter?	X			
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			The client must sign a release of information form and be informed of the potential for ineffective communication. This is documented in the case.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			
Is the information that is to be inserted into NOA translated into the client's primary language?	X			The information to be inserted into NOAs' would be translated by bilingual staff or paid interpreters.

Question	Yes	No	Some-times	Comments
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			TDD and other auxiliary aids, and sign language interpreters are available.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			Staff interviewed stated that they would offer to read for the client and assist them in completing the forms.
Does the county offer screening for learning disabilities?	X			In the Employment Services, all clients are offered screening for disabilities.
Is there an established process for offering screening?	X			Staff offer screening at initial contact.
Is the client identified as having a learning disability referred for evaluation?	X			A referral would be made to Department of Rehabilitation.

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	IHSS	CalWORKs	NAFS	WTW
Ethnic origin documentation	ERR	Narrative	SAWS1 & DFA 285	SAWS1 & DFA 285	Referral Form
Primary language documentation	ERR/90-9252 Primary Language Form	SOC 295 & 90-9252 Primary Language Form	90-9252 Primary Language Form	90-9252 Primary Language Form	SAWS1 90-9256 Form
Method of providing bilingual services and documentation	ERR and/or case narratives	Case Narrative	Case Narrative	Case Narrative	90-9084 Form
Client provided own interpreter	None found in case sample.	Case Narrative	None found in case sample.	None found in case sample.	None found in case sample.
Method to inform client of potential problem using own interpreter	None found in case sample	Case Narrative	None found in case sample.	None found in case sample.	None found in case sample.
Release of information to Interpreter	None found in case sample.	Case Narrative	None found in case sample.	None found in case sample.	None found in case sample.
Individual's acceptance or refusal of written material offered in primary language	None found in case sample.	Case Narrative	90-9256 Form	90-9256 Form	None found in case sample.
Documentation of minor used as interpreter	None found in case sample.	None found in case sample.	None found in case sample.	None found in case sample.	None found in case sample.
Documentation of circumstances for using minor	None found in case sample.	None found in case	None found in case sample.	None found in case	None found in case

Documented Item	Children's Services	IHSS	CalWORKs	NAFS	WTW
interpreter temporarily		sample.		sample.	sample.
Translated notice of actions (NOA) contain translated inserts	Case and/or court documents	Case file	Case file	Case file	Case file
Method of identifying client's disability	ERR, CWSCMS	Case Narrative	SOF	SOF	90-9084 Form
Method of documenting a client's request for auxiliary aids and services	None found in case sample	None found in case sample	None found in case sample	None found in case sample	None found in case sample

B. Corrective Action: None

VII. STAFF DEVELOPMENT AND TRAINING

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

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			Staff receives training every year, alternating between Division 21 and Cultural Awareness.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			Staff interviewed had a good understanding on the discrimination complaint procedure.

Does the county provide employees Cultural Awareness Training?	X			Staff receives training every year, alternating between Division 21 and Cultural Awareness.
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			Staff interviewed knew who their predominant cultural groups are receiving services in their area.

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			Staff interviewed was able to identify the differences between the different complaints.
Did the employees know who the Civil Rights Coordinator is?	X			All staff interviewed were aware of 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			All staff knew the location of the Civil Rights posters.

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

IX. CONCLUSION

The CDSS found the Kings County Human Services Agency was found to be in substantial compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

Kings County Human Services Agency must remedy the violations identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the violations.

The CDSS Civil Rights Bureau would like to acknowledge and thank Peggy Marvin, Civil Rights Coordinator, Lupe Villa, Civil Rights Investigator, and the staff involved with the coordination and success of the review. The reviewer was given a warm welcome and complete cooperation throughout the review. Staff interviewed were found to be professional, pleasant, and committed to providing outstanding service to their clients. Kings County Human Services Agency is commended on its efforts and willingness to provide quality and superior service to its clients.

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.