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**DEPARTMENT OF SOCIAL SERVICES**

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EDMUND G. BROWN JR.  
GOVERNOR

March 4, 2011

Pat Cheadle, Director  
Kern County Department of Human Services  
100 E. California Avenue  
Bakersfield, CA 93307

Dear Ms. Cheadle:

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 21 – 24, 2010. Enclosed is the final report on the review. We apologize for the delay.

There was 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 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-09-09, all compliance reviews (and corresponding CAPs) performed after January 2008 will be ported 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](mailto:crb@dss.ca.gov).

Sincerely,

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

Enclosure

c: Cari Drake, Assistant Program Director

Ginny Krebs, Civil Rights Coordinator

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

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

Richard Trujillo, Chief  
Field Operations Bureau M.S. 8-9-32

Brian Tam, Chief  
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CalFresh Policy Bureau M.S. 8-9-32

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR  
Kern County Department of Human Services  
Conducted on June 21 – June 24, 2010**

**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**

**(916) 654-2107**

**Reviewer**

**Cindy Guzman**

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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 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 June 21 – 24, 2010. An exit interview was held on June 25, 2010 to review the preliminary findings.

The review was conducted in the following locations:

<b>Name of Facility</b>	<b>Address</b>	<b>Programs</b>	<b>Non-English languages spoken by a substantial number of clients (5% or more)</b>
Kern County Department of Human Services – Lake Isabella	7050 Lake Isabella Blvd., Lake Isabella, CA	CalWORKS/ CalFresh	English/Spanish
Kern County Department of Human Services- Lamont	8300 Segrue Road, Lamont, CA	CalWORKS/CalFresh	English/Spanish
Kern County Department of Human Services- Mojave	2340 Hwy 58 Mojave, CA	CalWORKS/CalFresh	English/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

<b>Classifications</b>	<b>Total</b>	<b>Bilingual</b>
Human Service Technicians/Social Workers	14	10
Office Technicians/Lobby	3	2
<b>Total</b>	<b>17</b>	<b>12</b>

#### Program Manager Surveys

Number of surveys distributed	3
Number of surveys received	3

#### Reviewed Case Files

English speakers' case files reviewed	5
Non-English or limited-English speakers' case files reviewed	60
Languages of clients' cases	Spanish, Vietnamese

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

<b>Access to Services, Information and Outreach</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	<b>X</b>			Regular business hours are Monday through Friday, 8 AM – 5 PM. Special arrangements can be made with workers for extended hours. Drop box is available for applications, and applications can be mailed in.
Does the county have extended hours to accommodate clients?	<b>X</b>			Arrangements can be made with workers to accommodate clients if needed (Working till 5:30).
Can applicants access services when they cannot go to the office?	<b>X</b>			Clients can apply by internet, and applications can be mailed in.

Does the county ensure the awareness of available services for individuals in remote areas?	<b>X</b>			Collaborative efforts with other community partners are ongoing. There is a worker out in the Frazier Park to assist clients in remote areas. Public Service Announcements on the Spanish radio stations are scheduled to inform clients of services.
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<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)?	<b>X</b>			
Is the pamphlet distributed and explained to each client at intake and re-certification?	<b>X</b>			
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, Ukranian, Vietnamese?	<b>X</b>			
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?	<b>X</b>			
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	<b>X</b>			
Were the current versions of the required posters present in the lobbies?	<b>X</b>			

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?			<b>X</b>	Three workers stated they did not know the location of the required posters, and did not know where the Civil Rights Coordinator's name or contact information was located for the public.
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?			<b>X</b>	Some instructional signs in the Mojave office lobby were not in the threshold language. Sample: information on dropping off paperwork, appointments, and window closed.

## **B. Corrective Actions**

<b>Informational Element</b>	<b>Corrective Action Required</b>
Posters	Kern County Department of Human Services shall ensure that the most current version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms. Div. 21-107.211
Directional signage	Kern County Department of Human Services shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and that where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages. Div. 21-107.212 and .24

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"	03/07 or 03/10
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](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

**Facility Location:** 7050 Lake Isabella Blvd., Lake Isabella

Facility Element	Findings	Corrective Action
Exterior entrance	Back door entrance ramp is too steep at 9.2% slope.	Slope of curb ramp does not exceed 1:12 (8.3% slope). (CA T24 1127B.5.3, ADA 4.8.2) p. 155
Outside signage	Back door entrance does not have the ISA sign.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.1) pp 186, 394
Foyer	Main Entrance Double Doors pressures are too heavy. Left door at 15 lbs., Right door at 20 lbs.	<p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p. 201</p> <p>Force to open fire door, minimum allowable not to exceed 15 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(1)) p. 201</p>
Men's Restroom	Door pressure is too heavy at 10 lbs.	<p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)) p. 201</p> <p>Force to open fire door, minimum allowable not to exceed 15 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(1)) p. 201</p>

	Toilet Tissue dispenser too far away from edge of toilet seat at 17".	Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301  Toilet paper dispenser minimum height from floor is 19". (CA T24 1115B.8.4, ADA 4.16.6) pp 295, 301
Women's Restroom	Door pressure is too heavy at 9 lbs.  Toilet Tissue dispenser too far away from edge of toilet seat at 17".	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  Force to open fire door, minimum allowable not to exceed 15 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(1)) p. 201  Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301  Toilet paper dispenser minimum height from floor is 19". (CA T24 1115B.8.4, ADA 4.16.6) pp 295, 301

**C. Facility Location:** 8300 Segrue Road, Lamont

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Parking	Two Accessible Parking spaces on the side of building are missing the International Symbol of Accessibility parking signs.	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

	<p>Accessible Parking spaces on side of building is missing the additional signage below the symbol sign stating "Minimum Fine \$250.00"</p> <p>Signage on pavement is faded and therefore not clear.</p>	<p>blue background. The sign shall be 70 sp. in. min. and, when in a path of travel, shall be posted at a height of 80" min. from the bottom of the sign to the finished grade. (CA T24 1129B.) (ADA4.6.4) p.133</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>The surface of each accessible parking stall or space must have a surface identification duplicating either of the following schemes:</p> <ul style="list-style-type: none"> <li>• By outlining or painting the stall or space in blue and outlining on the ground in the stall or space in white or suitable contrasting color a profile view depicting a wheelchair with occupant; OR</li> <li>• By outlining a profile view or a wheelchair with occupant in white on blue background. The profile view shall be located so that it is visible to a traffic enforcement officer when a vehicle is properly parked in the space and shall be 36" by 36".</li> </ul>
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	Access aisle is missing the words "NO PARKING".	<p>Pavement signage shall be 36" x 36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.1 &amp; 2) p 133</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.3.2) p. 135</p>
Exterior entrance	There is no international symbol of accessibility at Main entrance.	<p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.1) pp 186, 394</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. 396</p>
Men's Restroom	There is no Accessible signage on 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 doors, the sign shall be placed on nearest adjacent wall,</p>

		<p>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>
	Door pressure is too heavy at 12 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 201
	Soap dispenser is too high at 47".	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p. 294
	Toilet tissue is located too far from the front edge of toilet at 20".	Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp. 295, 301 Toilet paper dispenser minimum height from floor is 19". (CA T24 1115B.8.4, ADA 4.16.6) pp. 295, 301
Women's Restroom	There is no Accessible signage on door.	Door sign and wall sign shall be 60" above the floor to the center line of sign.

		<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>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 201</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> <p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp. 295, 301</p>
	<p>Door pressure is too heavy at 16 lbs.</p>	
	<p>Pipes under sink are not securely insulated.</p>	
	<p>Toilet tissue is located too far from the front edge of toilet at 20".</p>	

**E. Facility Location:** 2340 Hwy 58, Mojave

Facility Element	Findings	Corrective Action
Parking	<p>Unauthorized parking sign is missing from post.</p> <p>The Van Accessible space is missing the Van International Symbol of Accessibility parking sign. (Van Accessible sign is on the wrong space).</p> <p>There is no additional signage below the symbol of Accessible sign stating "Minimum Fine \$250.00.</p>	<p>Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p. 133</p> <p>Van-accessible spaces shall have a sign "Van-Accessible" mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space. (CA T24 1129B.4.2, ADA 4.1.2(5)(B), 4.6.4) p. 133</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>
Exterior entrance	Door pressure at main entrance is too heavy at 20 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  Force to open fire door, minimum allowable not to exceed 15 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(1)) p. 201
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**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			Workers identify a clients language needs upon first contact by using the "Language Cards".

Question	Yes	No	Some-times	Comments
Does the county use a primary language form?	X			Kern DHS uses the language form KCDHS 439.
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			Workers would either access the certified worker list or use the 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			Kern County DHS contracts with a language line provider.
Are county interpreters determined to be competent?	X			Personnel certify bilingual staff through a process that tests verbal, reading and writing skills.
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?		X		Workers stated they do not allow minors to be interpreters except in extenuating circumstances, temporarily at the specific request of the applicant/recipient.
Does the county allow the client to provide his or her	X			

Question	Yes	No	Some-times	Comments
own interpreter?				
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			
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			
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			
Does the county offer screening for learning disabilities?	X			
Is there an established process for offering screening?	X			Welfare to Work has screening for learning disabilities.

## 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	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	SAWS 1	SAWS 1
Primary language documentation	SAWS 1; Form: KCDHS 439	SAWS 1; Form: KCDHS 439
Method of providing bilingual services and documentation	There was significant documentation improvement on the method of providing bilingual services in case samples.	There was significant documentation improvement on the method of providing bilingual services in case samples.
Client provided own interpreter	Found documentation of client providing own interpreter in a few case samples.	Found documentation of client providing own interpreter in a few case samples.
Method to inform client of potential problem using own interpreter	Form: KCDHS 440	Form: KCDHS 440
Release of information to Interpreter	Form: KCDHS 440	Form: KCDHS 440
Individual's acceptance or refusal of written material offered in primary language	Form: KCDHS 439	Form: KCDHS 439
Documentation of minor used as interpreter	No documentation in case samples.	No documentation in case samples.

Documented Item	CalWORKs & Employment Services	Non-Assistance CalFresh
Documentation of circumstances for using minor interpreter temporarily	N/A	N/A
Translated notice of actions (NOA) contain translated inserts	Provided as needed on Spanish NOA's.	Provided as needed on Spanish NOA's.
Method of identifying client's disability	Form: KCDHS 439	Form: KCDHS 439
Method of documenting a client's request for auxiliary aids and services	Form: KCDHS 439	Form: KCDHS 439

## **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			
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 Awareness Training?	X			
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			

## 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	Two workers interviewed in the Mojave office, and one worker in the Lamont office did not know 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 complete and up to date?	X			

### B. Corrective Action

Element	Corrective Action
Civil Rights Coordinator	Kern County Department of Human Services shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Div. 21-117 and 21-107.21

## **IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL**

Kern County Department of Human Services Civil Rights Compliance Plan for the period April 1, 2010 through March 31, 2011, was received and 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 Cari Drake, Assistant Program Director, for organizing the details of the review. In each District Office, staff was 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.