



CDSS

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



EDMUND G. BROWN JR.  
GOVERNOR

October 3, 2012

John Davis, Director  
Tulare county Health & Human Services Agency  
5957 South Mooney Blvd.  
Visalia, CA 93277

Dear Mr. Davis:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office, Ms. Tiffany Marsh, during the course of the Civil Rights Compliance Review of July 23-26, 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 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

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, these documents 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 Ms. Marsh at (916) 651-6242 or by e-mail at [Tiffany.Marsh@dss.ca.gov](mailto:Tiffany.Marsh@dss.ca.gov).

Sincerely,

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

Enclosure

c: Karishma Fazalbhoy, Interim Civil Rights Coordinator

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT**

**FOR**

**Tulare County Health and Human  
Services Agency**

**Conducted on**

**July 23 – 26, 2012**

**California Department of Social Services**

**Human Rights and Community Services Division**

**Civil Rights Bureau**

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

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**Reviewer**

**Tiffany Marsh**

## 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 Tulare County Health and Human Services Agency with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on July 23-26, 2012. An exit interview was held 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>
Visalia IHSS	3500 W Mineral King Ave. Visalia	IHSS, APS	Spanish
Lindsay District Office	900 Sequoia Ave. Lindsay	CalFresh, WTW	Spanish
Tulare Office	160 North L Street Tulare	CWS	Spanish
State Hearings Office	26644 S Mooney Blvd. #B	N/A	Spanish
Tulare District Office	458 E O'Neal Tulare	CalWORKS	Spanish

### II. SUMMARY OF METHODOLOGY

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

- Reviewed the 2012-2013 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>
Eligibility Workers	8	5
Children Social Workers	4	2
Adult Program Workers	4	2
Receptionist/Screeners	4	3
<b>Total</b>	<b>20</b>	<b>12</b>

#### Program Manager Surveys

Number of surveys distributed	5
Number of surveys received	5

#### Reviewed Case Files

English speakers' case files reviewed	18
Non-English or limited-English speakers' case files reviewed	62
Languages of clients' cases	Lahu, Portuguese, Samoan, Spanish, Tagalog

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?	X			Staff will schedule appointments before and after regular business hours to prevent client taking time off.
Does the county have extended hours to accommodate clients?	X			Office hours are 7:30 am – 6:00 pm.
Can applicants access services when they cannot go to the office?	X			Clients can mail in applications. Staff will accommodate clients by scheduling a home visit appointment and/or conducting an over-the-phone interview.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Awareness of available services is made through TulareWORKS website, brochures, health fairs, hospitals, clinics, and other outside agencies.

<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 – 6/11)?	X			Pub 13 is provided to clients in preferred language at Intake and Recertification.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			Staff explains Pub 13 to ensure clients are aware and understand their rights and responsibilities.
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			Pub 13 is made available to clients in lobby.
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			"I Speak" cards are also available.
Was the Pub 13 available in large print (English and Spanish), compact disk (CD) and Braille?	X			Available at receptionist counter.
Were the current versions of the required posters present in the lobbies?	X			Pub 86 (03/07) Form AD-475B (12/99).
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			Each staff interviewed knew the location of posters and CRC contact information.
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			Instructional and directional signage posted in English and threshold language (Spanish).

**B. Corrective Actions**

None

**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, California Code of 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: 3500 W. Mineral King Ave., Ste. A, Visalia**

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Parking	Ramp slope is too steep at 9.1%.	The max. slope of a ramp shall be 1:12 (8.3% slope). (CA T24 1133B.5.3)(ADA 4.8.2) p 148

Main entrance	Force to open door is excessive at 8 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
Water fountain	Knee space is below minimum requirement at 26".	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
Restroom	Men: Wall signage is too low at 55", door signage is too high at 64" at center-line.  Force to open door is excessive at 15 lbs.  Women: Wall signage is too low at 56", door signage is too high at 66" at center-line.	Door sign and wall sign shall be 60" above the floor to the center-line of sign. (CA T24 1117B.5.7) (ADA 4.30.6) p 287  Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207  Door sign and wall sign shall be 60" above the floor to the center line of sign. (CA T24 1117B.5.7) (ADA 4.30.6) p 287

- a. **Recommendation**  
None

**2. Facility Location:** 900 N. Sequoia Ave., Lindsay

Facility Element	Findings	Corrective Action
Parking	Van accessible parking stall measured at 17'10" in length.	Parking space dimensions: 9' minimum width and 18' minimum length (CA T24 1129B.3.1) p 138

	<p>Van accessible aisle ramp slope is too steep at 10.8 %.</p> <p>Accessible aisle measured at 4'7" in width.</p> <p>Accessible aisle ramp slope is too steep at 9.3 %.</p>	<p>The max. slope of a ramp shall be 1:12 (8.3% slope). (CA T24 1133B.5.3)(ADA 4.8.2) p 148</p> <p>Access aisle dimensions: 5' wide by 18' long. (CA T24 1129B.3.1 &amp;2) ADA 4.6.3) p 136</p> <p>The max. slope of a ramp shall be 1:12 (8.3% slope). (CA T24 1133B.5.3)(ADA 4.8.2) p 148</p>
Restroom	<p>Men: Wall signage is too low at 55", door signage is too low at 53" at center-line.</p> <p>Force to open door is excessive at 10 lbs.</p> <p>Women: Wall signage is too low at 55", door signage is too low at 54" at center-line.</p> <p>Force to open both doors is excessive at 10 lbs.</p>	<p>Door sign and wall sign shall be 60" above the floor to the center line of sign. (CA T24 1117B.5.7) (ADA 4.30.6) p 287</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207</p> <p>Door sign and wall sign shall be 60" above the floor to the center line of sign. (CA T24 1117B.5.7) (ADA 4.30.6) p 287</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207</p>

**a. Recommendation**  
None

### 3. Facility Location: 160 North L Street, Tulare

Facility Element	Findings	Corrective Action
Parking	Van accessible parking stall measured at 17'2".	Parking space dimensions: 9' minimum width and 18' minimum length (CA T24 1129B.3.1) p 138
Restroom	Men: Door signage is too low at 58" at center-line.  Force to open door is excessive at 10 lbs.  Women: Force to open door is excessive at 8 lbs.	Door sign and wall sign shall be 60" above the floor to the center line of sign. (CA T24 1117B.5.7) (ADA 4.30.6) p 287  Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207  Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5) (ADA 4.13.11(2)(b)) p 207

- a. **Recommendation**  
None

### 4. Facility Location: 26644 S. Mooney Blvd., Ste. B, Visalia

Facility Element	Findings	Corrective Action
Parking	Van accessible aisle ramp slope is too steep at 11.4 %.	The max. slope of a ramp shall be 1:12 (8.3% slope). (CA T24 1133B.5.3)(ADA 4.8.2) p 148
Exterior entrance	Force to open door is excessive at 13 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

Restroom	Soap dispenser is high at 41".	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.8.1.1) (ADA 4.19.6) p 296, 299, 304
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**a. Recommendation**  
None

**5. Facility Location: 458 E. O'Neal, Tulare**

Facility Element	Findings	Corrective Action
Water fountain	Drinking fountain did not meet the minimum knee height requirement.	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
Restroom	Men: Wall signage is too low at 54", door signage is too low at 54" at center-line.  Urinal is too high at 22".  Accessible toilet is too high at 20".  Women: Wall signage is too low at 55", door signage is too	Door sign and wall sign shall be 60" above the floor to the center line of sign. (CA T24 1117B.5.7) (ADA 4.30.6) p 287  Rim height shall be a maximum of 17" in height above the floor. (CA T24 1115B.4.2.1) p 290  Height of water closet is 17" to 19" measured from the floor to the top of a maximum 2" high toilet seat. (CA T24 1115B.4.1.4, ADA 4.16.3) p 312  Door sign and wall sign shall be 60" above the floor to the

	low at 54" at center-line.	center line of sign. (CA T24 1117B.5.7) (ADA 4.30.6) p 287
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- a. **Recommendation**  
None

**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			Bilingual staff, Form 7 "Language Service Record", and "I Speak" cards.
Does the county use a primary language form?	X			Form 7 "Language Service Record", and Form 113 "Documentation of Language"

Question	Yes	No	Some- times	Comments
				Preference"
Does the client self-declare on this form?	X			Form 7 "Language Service Record", and Form 113 "Documentation of Language Preference"
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Certified Bilingual (Spanish) and contracted Interpreter Services
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 a bilingual worker. If there is no bilingual worker in client's preferred language, an interpreter is contacted through contracted language services.
Is there a delay in providing services?			X	If delay occurs due to uncommon preferred language, arrangements for interpreter services will be made.
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			
Are county interpreters determined to be competent?	X			County interpreters are certified through the county.
Does the county have adequate interpreter services?	X			Bilingual staff, county interpreter list and language line provider.
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			Client must fill-out Form 24 "Request for Interpretive Services" indicating use of own interpreter.

Question	Yes	No	Some-times	Comments
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			Client-provided interpreter must sign Form 25 "Confidentiality and Compliance Agreement".
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			Staff will assist client who cannot read by reading material out loud. Staff will assist a client who cannot write by filling out their forms. Assisted services are documented in the case comments.
Does the county offer screening for learning disabilities?	X			
Is there an established process for offering screening?	X			

Question	Yes	No	Some-times	Comments
Is the client identified as having a learning disability referred for evaluation?	X			

## B. Corrective Actions

Area of Findings	Corrective Actions
Timely Services	Tulare County must ensure that bilingual/interpretive services are prompt and without undue delay. Div. 21-115

## C. Recommendation

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

Documented Item	Children's Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	Case Referral Sheet, CWS/CMS	Soc 293, Soc 341	CalWIN,	CalWIN
Primary language documentation	Form 7, Form 113	Form 7, Form 113	Form 7, Form 113	Form 7, Form 113
Method of providing bilingual services and documentation	Case Notes, Form 7 (Inconsistent documentation)	Case Narrative, Form 7, Form 113	CalWIN Demographic Summary, Case Comments (Inconsistent documentation)	CalWIN Demographic Summary, Case Comments (Inconsistent documentation)

<b>Documented Item</b>	<b>Children's Services</b>	<b>Adult Programs (IHSS &amp; APS)</b>	<b>CalWORKs &amp; Employment Services</b>	<b>Non-Assistance CalFresh</b>
Client provided own interpreter	Form 7	Form 7, Form 24	Form 7, Form 24	Form 7, Form 24
Method to inform client of potential problem using own interpreter	Form 24	Form 24	Form 24	Form 24
Release of information to Interpreter	Form 25	Form 25	Form 25	Form 25
Individual's acceptance or refusal of written material offered in primary language	Form 7	Form 7, Form 113	Form 7, Form 113	Form 7, Form 113
Documentation of minor used as interpreter	None found in case review	None found in case review	None found in case review	None found in case review
Documentation of circumstances for using minor interpreter temporarily	None found in case review	None found in case review	None found in case review	None found in case review
Translated notice of actions (NOA) contain translated inserts	Case File	Case File	CalWIN Case Comments, Client Correspondence	CalWIN Case Comments, Client Correspondence
Method of identifying client's disability	Case Notes	Case File, Intake/Annual Review Form	CalWIN Case Comments	CalWIN Case Comments
Method of documenting a client's request for auxiliary aids and	Case Notes	Case Narrative	Case Comments	Case Comments

Documented Item	Children's Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
services				

### B. Corrective Actions

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

### C. Observation

There was an inconsistency in the bilingual case documentation as it pertains to the exact method employed to provide bilingual services to the client. It is suggested that each case documentation entry include the type of bilingual services received and by whom the services were provided.

## 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	Sometimes	Comments
Do employees receive continued Division 21 Training?	X			Training provided every 18 months.

Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			Staff provides Gen 1179 "Complaint of Discrimination" form and Pub 13, explains rights and procedure to client, and forwards complaint to the proper entity for follow-up.
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			

**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	Sometimes	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?			X	5 out of 20 staff interviewed could not clearly distinguish the difference between the three types of discrimination complaints.
Did the employees know	X			

<b>Interview and review areas</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Findings</b>
who the 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			Information located in lobby on poster Pub 86.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

## **B. Corrective Action**

<b>Element</b>	<b>Corrective Action</b>
Discrimination Process	Tulare County shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203

## **C. Recommendation** None

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

The Tulare County Health and Human Services Agency Civil Rights Compliance Plan for the period February 1, 2012 through January 31, 2013, was received on February 9, 2012. It is approved as submitted.

## **X. CONCLUSION**

The CDSS reviewer found the Tulare County Health and Human Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Karishma Fazalbhoy, Interim Civil Rights Coordinator, for organizing the details of the review, and to everyone one else 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 Tulare County Health and Human Services Agency 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 Tulare County Health and Human Services Agency 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.