



## *Meeker County Social Services Department*

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# COMPREHENSIVE CIVIL RIGHTS PLAN JULY, 2016

### Contact Information:

Civil Rights, ADA, and LEP Contact:

Paul Bukovich

320-693-5300 (telephone/voicemail)

320-693-5204 (TTY/TDD)

[paul.bukovich@co.meeker.mn.us](mailto:paul.bukovich@co.meeker.mn.us)

A copy of this policy is posted on the County website ([www.co.meeker.mn.us](http://www.co.meeker.mn.us)),  
as well as on the bulletin board in the Social Services lobby.

### **Americans with Disabilities Act (ADA) Advisory:**

This information is available in accessible formats for people with disabilities by calling (320) 693-5300 (voice) or by using your preferred relay service. For other information on disability rights and protections, contact the agency's ADA contact.

**Comprehensive Civil Rights Plan  
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## PURPOSE

As a recipient of federal financial assistance, Meeker County Social Services is responsible for providing core services to assist and support Minnesota's most vulnerable individuals and families so they can meet their basic needs and be treated with respect and dignity. Meeker County Social Services has a civil rights plan to ensure that all eligible individuals receive equal access to program services and information. Its programs are operated in a nondiscriminatory way, without regard to race, color, national origin, age, disability, sex, sexual orientation, religion, political beliefs, creed and public assistance status. In medical programs, "sex" includes sex stereotypes and gender identity under any health program or activity receiving federal funds. The civil rights plan also serves as a source of information for county agency staff and the general public. The plan sets out the agency's civil rights administrative policies and procedures, identifying key contacts within the agency and linking the reader to applicable state and federal civil rights laws and resources.

## LEGAL AUTHORITIES

### **Federal**

1. Title VI of the Civil Rights Act of 1964 (race, color, national origin)
2. Section 504 of the Rehabilitation Act of 1973 (disability)
3. Section 508 Amendment of the Rehabilitation Act of 1973 (disability)
4. Title II of the Americans with Disabilities Act of 1990; State and local government services (disability)
5. Age Discrimination Act of 1975 (age)
6. Community Service Assurance Provisions of the Hill-Burton Act (health facilities receiving Hill-Burton Funds)
7. Section 1557 of the Patient Protection and Affordable Care Act (added sex discrimination in health care programs)
8. Nondiscrimination Provisions of the Omnibus Budget Reconciliation Act of 1981 (Federal Block Grants):
  - Community Services Block Grant (race, color, national origin, sex) **Remaining block grants** (race, color, national origin, age, disability, sex, religion)
  - Social Services Block Grant
  - Maternal and Child Health Services Block Grant
  - Projects for Assistance in Transition from Homelessness Block Grant
  - Preventive Health and Health services Block Grant
  - Community Mental Health Services Block Grant
  - Substance Abuse Prevention and Treatment Block Grant
9. Title IX of the Education Amendments of 1972 (sex)
10. Family Violence Prevention and Services Act (race, color, national origin, age, disability, sex, religion)
11. Food Stamp Act of 1977 [as amended through P.L. 108-269, 2004]

12. Nondiscrimination Compliance Requirements in the Food Stamp Program, Food and Nutrition Service, U.S. Department of Agriculture
13. Bilingual Requirements in the Food Stamp Program, Food and Nutrition Service, U.S. Department of Agriculture
14. FNS Instruction 113-1, Civil Rights Compliance and Enforcement – Nutrition Programs and Activities, Food and Nutrition Service, U.S. Department of Agriculture (2005)
15. Equal Opportunity for Religious Organizations in USDA Regulation

**State**

Minnesota Human Rights Act, Chapter 363A

**CONTACT INFORMATION**

The following contact information pertains to Meeker County Social Service’s Comprehensive Civil Rights Plan as well as the Limited English Proficiency (LEP) Plan and the Americans with Disabilities Act (ADA):

Contact: Paul Bukovich, Director  
Address: 114 N Holcombe Ave., Ste 180, Litchfield MN 55355  
Phone: 320-693-5300 (voice)  
Fax: 320-693-5344  
TTY/TDD: 320-693-5204 (or use your preferred relay service)  
Email: [paul.bukovich@co.meeker.mn.us](mailto:paul.bukovich@co.meeker.mn.us)

**MEEKER COUNTY SOCIAL SERVICES EQUAL OPPORTUNITY POLICIES AND PROCEDURES INCLUDING EQUAL ACCESS FOR PEOPLE WITH DISABILITIES**

Meeker County Social Services does not discriminate on the bases of race, color, national origin, sex, sexual orientation, age, creed, religion, political beliefs, disability or public assistance status. Sex includes sex stereotypes and gender identity, under any medical or health program receiving federal financial assistance. The following are program examples: Medical Assistance, CHIP programs, clinics, insurance companies and state health insurance exchanges. This policy extends to prohibit discrimination in services that are administered and delivered according to Federal, State and local civil rights laws, executive orders, rules and regulations.

“Equal opportunity” has the following components:

- That no otherwise qualified person, under any program or activity receiving federal financial assistance (and state financed under ADA), shall be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination;
- That each program or activity is conducted so, when viewed in its entirety, it is readily accessible to and usable by individuals with physical, mental or emotional disabilities, including making reasonable accommodations or modifications in policies, practices or

procedures when necessary unless doing so would result in either a fundamental alteration in the nature of the program or undue financial and administrative burdens;

- That applicant/client eligibility determinations, assignments to staff and facilities, treatment by staff, access to information about programs, physical and programmatic access to facilities, referral services, intake and admissions procedures assessment, diagnosis, evaluations and treatment, outreach, patient disciplinary actions and termination of services are made without regard to protected class status; and
- That services and information are provided in the appropriate language to persons with “limited English proficiency” (LEP) as well as appropriate auxiliary aids and services including, but not limited to, use of a TTY/TDD and/or telephone relay service for individuals who are deaf or hard of hearing, providing readers for persons who are blind or visually impaired, providing literature or posters in formats that are understandable to blind or visually impaired individuals and providing appropriate assistance to individuals with developmental and learning disabilities.

### **Program Accessibility Policy for People with Disabilities**

Meeker County and all of its services, programs and benefits, are accessible to and usable by people with disabilities, including people with hearing loss, low vision and other sensory disabilities.

To avoid disability discrimination, Meeker County will:

- Notify the public about the rights and protections for people with disabilities under the Americans with Disabilities Act.
- Designate an ADA Coordinator and maintain a complaint procedure.
- Make sure that its buildings are physically accessible for people with disabilities.
- Assist individuals with disabilities to apply and qualify for benefits based on their eligibility.
- Provide appropriate auxiliary aids and services, including accessible formats, to ensure effective communication with people with disabilities.
- Provide services, programs and benefits that are accessible to and usable by qualified people with disabilities.

### **Physical access includes:**

- Convenient off-street parking designated specifically for people with disabilities.
- Curb cuts and ramps between parking areas and the Meeker County Family Services building.
- Level access into the first floor of Meeker County Human Services building with elevator access to all other floors.

## **Reasonable Modifications to Policies, Procedures or Practices**

Meeker County will make reasonable modifications to its policies, procedures, or practices when necessary to avoid discrimination on the basis of disability, unless Meeker County can demonstrate that making the modifications would fundamentally alter the nature of the services, programs or benefits.

## **Effective Communication and Auxiliary Aids and Services**

Meeker County will take appropriate steps to ensure that communications with people with disabilities and companions with disabilities are as effective as communications with others. To ensure effective communications, Meeker County will provide appropriate auxiliary aids and services, including accessible formats, so that people with disabilities can receive services, programs and benefits and participate in them in the same way as people without disabilities. Auxiliary aids and services include qualified readers, writers, and interpreters who convey information effectively, accurately and impartially using any necessary specialized vocabulary.

To determine what types of auxiliary aids or services are necessary, Meeker County will give primary consideration to the requests of people with disabilities. Meeker County will honor the choice of the person requesting the auxiliary aid or service unless it would fundamentally alter the nature of the service, program or benefit or cause an undue administrative or financial burden. If this happens, Meeker County will find another equally effective auxiliary aid or service.

## **ADA Notice Posting**

Meeker County Social Services has, as part of its **Civil Rights Compliance Plan**, incorporated the use of the ADA-related brochure **“Do You Have A Disability” (DHS-4133-ENG)**. This document is posted in the central reception area of the agency and is attached as Appendix 1 to this plan. DHS-4133-ENG is also included in application packets distributed to program applicants.

## **MEEKER COUNTY SOCIAL SERVICES COMPLAINT RESOLUTION PROCEDURE**

You have the right to file a discrimination complaint with Meeker County Social Services if you believe you have been treated in a discriminatory way. It is against the law for any human services agency to discriminate against applicants, clients or members of the public because of race, color, national origin, creed, religion, sexual orientation, public assistance status, age, disability or sex (including sex stereotypes and gender identity under any health program or activity receiving federal financial assistance).

Meeker County Social Services will refer all civil rights complaints to the Minnesota Department of Human Services (DHS). Complaints must be in writing unless you need special help. Contact our office or contact DHS directly through its Civil Rights Coordinator to get the complaint forms.

Meeker County Social Services  
114 N Holcombe Ave, Ste 180  
Litchfield MN 55355  
(320) 693-5300 (direct/voicemail)  
(320) 693-5204 (TTY/TDD) or use your preferred relay service  
(320) 693-5344 (fax)

Or contact:

DHS Civil Rights Coordinator  
Minnesota Department of Human Services  
Office of Equal Opportunity  
PO Box 64997  
St Paul MN 55164-0997  
(651) 433-3040 (voice) or use your preferred relay service  
(651) 431-7444 (fax)

You also have the right to file a discrimination complaint directly with the Minnesota Department of Human Rights, and the federal agencies that operate the benefits programs.

The **Minnesota Department of Human Rights** prohibits discrimination in public services programs because of race, color, national origin, creed, religion, disability, sex, sexual orientation, or public assistance status. Contact the agency directly:

Minnesota Department of Human Rights  
Freeman Building, 625 N Robert St  
St Paul MN 55155  
(651) 539-1100 (voice)  
(800) 657-3704 (toll free)  
711 or (800) 627-3529 (MN relay)

The **U.S. Department of Health and Human Services' Office for Civil Rights** prohibits discrimination in its programs because of race, color, national origin, age, disability, religion and sex (including sex stereotypes and gender identity under any health program or activity receiving federal financial assistance). Contact the agency directly:

U.S. Department of Health and Human Services  
Office for Civil Rights, Region V  
233 N Michigan Ave, Ste 240  
Chicago IL 60601  
(312) 886-2359 (voice)  
(800) 368-1019 (toll free)  
(800) 537-7697 (TTY)

In accordance with Federal civil rights law and **U.S. Department of Agriculture (USDA)** civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) Mail: U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Ave SW  
Washington DC 20250-9410
- (2) Fax: (202) 690-7442; or
- (3) Email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

This institution is an equal opportunity provider.

### **MEEKER COUNTY LIMITED ENGLISH PROFICIENCY PLAN (LEP)**

Meeker County's LEP plan is incorporated in its entirety into the Comprehensive Civil Rights Plan. Please see Appendix 2 for a copy of the plan.

### **ANNUAL CIVIL RIGHTS TRAINING**

Annual Civil Rights training for SNAP workers is required under USDA rules. All staff who administer the SNAP program, as well as staff who come in direct contact with the public (such as support staff, supervisors and managers) will be required to review training materials annually, either verbally in a unit meeting or through a State-provided PowerPoint at the discretion of their supervisor. Staff will sign a training roster after completing the training. The training roster will be available to DHS and SNAP Management Evaluation reviewers as requested.

## **CIVIL RIGHTS ASSURANCE OF COMPLIANCE**

The signed and dated Civil Rights Assurance of Compliance is attached to this plan as Appendix 3.

## **CIVIL RIGHTS PLAN ADMINISTRATION**

The Comprehensive Civil Rights Plan will be posted on the bulletin boards:

- In the main lobby of Meeker County Social Services
- In the employee breakroom on the second floor of the Meeker County Family Services building.

The Comprehensive Civil Rights Plan will be posted under the Social Services tab on Meeker County Social Services' website: [www.co.meeker.mn.us](http://www.co.meeker.mn.us).

The Comprehensive Civil Rights Plan will be reviewed annually with all staff at one of four quarterly all agency meetings.

For the benefit of applicants, clients, and members of the public, copies of Meeker County's Equal Opportunity policy, complaint resolution procedure, and disability policies and procedures will be prominently posted on the Meeker County Social Services bulletin board in the agency lobby.

DHS-4133-ENG ("Do You Have a Disability?"):

- Will continue to be posted in Meeker County Social Services' agency lobby to give notice to the public about the ADA's requirements; and
- Will continue to be included in all program information and application packets as part of the information on *rights and responsibilities*.

SNAP civil rights training will be conducted and documented annually, per information in the "Annual Civil Rights Training" portion of this Comprehensive Civil Rights plan.

**APPENDIX 1:**

**DHS-4133-ENG**

**“DO YOU HAVE A DISABILITY?”**

## Do you have a disability?

If you have a disability, you have the same rights as others.

Please tell us if you have a disability so we can help you access human services programs and benefits.

### What medical conditions may be disabilities?

A disability is a physical, sensory, or mental impairment that materially limits a major life activity.

Types of disabilities may include:

- Diseases like diabetes, epilepsy or cancer
- Learning disorders like dyslexia
- Developmental delays
- Clinical depression
- Hearing loss or low vision
- Movement restrictions like trouble with walking, reaching or grasping
- History of alcohol or drug addiction, although current illegal drug use is not a disability.

If you are asking for or are getting benefits through either a county human services agency or the Minnesota Department of Human Services, that office will let you know if you have a disability using information from you and your doctor.

### What help is available?

If you have a disability, your county or the state human services agency can help you by:

- Calling you or meeting with you in another place if you are not able to come into the office

- Using a sign language interpreter
- Giving you letters and forms in other formats like computer files, audio recordings, large print or Braille
- Telling you the meaning of the information we give you
- Helping you fill out forms
- Helping you make a plan so you can work even with your disability
- Sending you to other services that may help you
- Helping you to appeal agency decisions about you if you disagree with them.

You will not have to pay extra for help. If you want help, ask your agency as soon as possible. An agency may not be able to accommodate requests made within 48 hours of need.

### How does the law protect people with disabilities?

The Americans with Disabilities Act (ADA) and the ADA Amendments Act are federal laws, and the Minnesota Human Rights Act is a state law. Each gives individuals with disabilities the same legal rights and protections as people without disabilities, including access to public assistance benefits. You will not be denied benefits because you have a disability. Your benefits will not be stopped because of your disability. If your disability makes getting benefits hard for you, your county human services agency will help you access all of the programs that are available to you.

## Discrimination is against the law

You have the right to file a complaint if you believe you were treated in a discriminatory way by a human services agency. You can contact any of the following agencies directly to file a civil rights complaint.

The **Minnesota Department of Human Services, Equal Opportunity and Access Division**, prohibits discrimination in its programs because of race, color, national origin, creed, religion, sexual orientation, public assistance status, age, disability or sex (including sex stereotypes and gender identity under any health program or activity receiving federal financial assistance). Contact the Equal Opportunity and Access Division directly:

Minnesota Department of Human Services  
Equal Opportunity and Access Division  
P.O. Box 64997  
St. Paul, MN 55164-0997  
651-431-3040 (voice) or  
use your preferred relay service

The **Minnesota Department of Human Rights** prohibits discrimination in public services programs because of race, color, creed, religion, national origin, disability, sex, sexual orientation, or public assistance status. Contact the Minnesota Department of Human Rights directly:

Minnesota Department of Human Rights  
Freeman Building, 625 North Robert Street  
St. Paul, MN 55155  
651-539-1100 (voice)  
800-657-3704 (toll free)  
711 or 800-627-3529 (MN Relay)

The **U.S. Department of Health and Human Services' Office for Civil Rights** prohibits discrimination in its programs because of race, color, national origin, age and disability; in block grant complaints, religion and sex are included; and in medical

program complaints, sex includes sex stereotypes and gender identity under any health program or activity receiving federal financial assistance, such as Medicaid and CHIP programs, hospitals, clinics, employers, insurance companies and state health insurance exchanges created under Title I of the Affordable Care Act. Contact the federal agency directly:

U.S. Department of Health and Human Services  
Office for Civil Rights, Region V  
233 North Michigan Avenue, Suite 240  
Chicago, IL 60601  
312-886-2359 (voice)  
800-368-1019 (toll free)  
800-537-7697 (TTY)

The **U.S. Department of Agriculture** prohibits discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)

If you wish to file a Civil Rights program complaint of discrimination, complete the **USDA Program Discrimination Complaint Form**, found online at [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html), or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at [program.intake@usda.gov](mailto:program.intake@usda.gov).

Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish).

For any other information dealing with Supplemental Nutrition Assistance Program (SNAP) issues, persons should either contact the USDA SNAP Hotline Number at 800-221-5689, which is also in Spanish or call the **State Information/Hotline Numbers** (click the link for a listing of hotline numbers by State); found online at [http://www.fns.usda.gov/snap/contact\\_info/hotlines.htm](http://www.fns.usda.gov/snap/contact_info/hotlines.htm).

USDA is an equal opportunity provider and employer.



Attention. If you need free help interpreting this document, ask your worker or call the number below for your language.

ملاحظة: إذا أردت مساعدة مجانية لترجمة هذه الوثيقة، اطلب ذلك من مشرفك أو اتصل على الرقم 1-800-358-0377.

កំណត់សំគាល់ ។ បើអ្នកត្រូវការជំនួយក្នុងការបកប្រែឯកសារនេះដោយឥតគិតថ្លៃ សូមសួរអ្នកកាន់សំណុំរឿង របស់អ្នក ឬហៅទូរស័ព្ទមកលេខ 1-888-468-3787 ។

Pažnja. Ako vam treba besplatna pomoć za tumačenje ovog dokumenta, pitajte vašeg radnika ili nazovite 1-888-234-3785.

Thov ua twb zoo nyeem. Yog hais tias koj xav tau kev pab txhais lus rau tsab ntaub ntawv no pub dawb, ces nug koj tus neeg lis dej num los sis hu rau 1-888-486-8377.

ໂປຣດຊາບ. ຖ້າທາກ ທ່ານຕ້ອງການການຊ່ວຍເຫຼືອໃນການແປເອກະສານນີ້ຟຣີ, ຈົ່ງຖາມພະນັກງານກຳກັບການຊ່ວຍເຫຼືອຂອງທ່ານ ຫຼື ໂທໂທ 1-888-487-8251.

Hubachiisa. Dokumentiin kun bilisa akka siif hiikamu gargaarsa hoo feete, hojjettoota kee gaafadhu ykn afaan ati dubbattuuf bilbilli 1-888-234-3798.

Внимание: если вам нужна бесплатная помощь в устном переводе данного документа, обратитесь к своему социальному работнику или позвоните по телефону 1-888-562-5877.

Digniin. Haddii aad u baahantahay caawimaad lacag-la'aan ah ee tarjumaadda qoraalkan, hawlwadeenkaaga weydiiso ama wac lambarka 1-888-547-8829.

Atención. Si desea recibir asistencia gratuita para interpretar este documento, comuníquese con su trabajador o llame al 1-888-428-3438.

Chú ý. Nếu quý vị cần được giúp đỡ dịch tài liệu này miễn phí, xin gọi nhân viên xã hội của quý vị hoặc gọi số 1-888-554-8759.

LBI-0001 (3-13)

ADA5 (12-12)

**This information is available in accessible formats for individuals with disabilities by contacting your county worker. For other information on disability rights and protections to access human services programs, contact the agency's ADA coordinator.**

agency

**APPENDIX 2:**  
**LIMITED ENGLISH PROFICIENCY**  
**(LEP) PLAN**

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**Meeker County Social Services**  
**114 N. Holcombe Ave Suite 180**  
**Litchfield, MN 55355**

**Limited English Proficiency (LEP) Plan**  
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## **Limited English Proficiency (LEP) Plan**

Developed: 06-01-2001, Most Recent Revision: 05-16-2016

<b>LEP Coordinator:</b>	<b>Paul Bukovich, Director</b>	<b>320-693-5300</b>
Financial Assistance:	LoAnn Shepard, Supervisor	
Social Services:	Pat Thomas, Supervisor	
	Pam White, Supervisor	
Child Support:	Candee Gassman, Supervisor	
Office Support:	LoAnn Shepard, Supervisor	
Fiscal Services:	Marlene Rimmel, Supervisor	

### **100 - Purpose and Legal Basis**

The following document serves as the Meeker County Social Services (MCSS) plan to meet the legal obligation of language access requirements in compliance of Title VI of the Civil Rights Act of 1964; 7 CFR, 273 et seq; and 42 CFR 435 et seq. There are four components to this document.

**200 - Assessment      300 - Policy      400 - Training      500 - Monitoring**

### **200 - Assessment**

**201 - Needs Assessment** - MCSS will on at least an annual basis make a needs assessment of the unique language needs within Meeker County. Meeker County will review data provided by DHS or the Census Bureau to identify the types of non-English languages that are most predominant in Meeker County. We will review those which constitute populations that the County serves or those that may be eligible for County-provided services.

**202 - Case Finding** - Specific language needs of each applicant with LEP will occur at the time of intake or application. This will primarily be done by reviewing the language preference questions on the Health Care Application (HCAPP) and the Combined Application Form (CAF). Language preferences will be entered into the applicant's primary language field in the MAXIS system. If an interpreter is needed, it also will be entered in the MAXIS system. If the main receptionist or intake worker suspects that the applicant is a person with LEP, the worker will present the LEP person with a card that lists the ten major languages in order to determine which language is involved, if any. It is expected that reasonable efforts will be made by MCSS to provide same-day interpreter services.

**203 - Points of Contact** - The greatest likelihood of need for interpreter services will be at the point of application for financial assistance or when an ongoing customer calls into the agency. The principal point of contact will most likely be in the office setting in Litchfield or by phone. The most appropriate form of interpreter services will likely be language assistance in completion of an application for financial assistance, health care, or social services programs. The other point of contact may involve field-based contact when conducting child protection assessments or pre-petition screenings for civil commitments. These contacts will typically take place in a private residence. In most cases the initial contact will require the use of the Language Line Services due to the unscheduled nature of the contact both in field and office settings and over the phone.

**204 - Resources Needed** - MCSS will utilize services available through private interpreters known to the Agency when face-to-face or certified interpreter/translator services are needed. Additionally, MCSS has an agreement with the State Department of Administration to obtain Language Line Services (1-800-367-9559) for non-English speaking clientele. The Agency does have interactive television (ITV) capabilities. When appropriate, the use of ITV will be considered.

**205 - Timely Access** - Services are available through private interpreters during customary business hours, Monday through Friday, 8:00AM to 4:30PM. Language Line Services are available 24x7. Contact with either entity will be made by commercial phone. When on-site interpreter services are to be used, it will be necessary to schedule appointments at mutually convenient times - for the client and the interpreter. Use of ITV, if used, will occur in a private setting within the Courthouse buildings.

### **300 - Policies and Procedures**

**301 - Agency Commitment** - MCSS is committed to the spirit of the Civil Rights Act of 1964. It recognizes the importance of providing meaningful access to all persons, including persons with LEP, to the various programs operated under the umbrella of Morrison County Social Services.

**302 - Range of Oral Language Assistance** - There will be limited oral language assistance on site at Meeker County Social Services from current agency employees. Spanish is the primary non-English language in Meeker County; however, we will rely on provider organizations that have the capacity to serve a broad range of languages. The Language Line Services will be used when more immediate needs for interpreter services are identified across the full spectrum of languages. MCSS will take advantage of the brief "notice of rights to language services" documents for persons with LEP as they are made available by the Department of Human Services.

**303 - Uncommon Languages** - There may be circumstances when customers present for services that use a language other than that most commonly used in Meeker County. There may be languages such as Russian, Chinese, Hmong, Vietnamese, Khmer/Cambodian, Lao, Somali and the like. Receptionist staff will refer all such cases to the Financial Assistance Unit. If they are not able to determine the person's language, they will ask an agency supervisor or the director for assistances. This person will be responsible for trying to determine the customer's language or country of origin. Once determined, contact will be made with an appropriate Language Line Services interpreter in the customary manner.

**304 - Affirmative Action** - The MCSS employee handling the case will inform either the customer or the interpreter once it has been determined that interpreter services are needed, that there is no charge or fee for the service. This will be communicated in verbal form. At no time in the service delivery process will the customer incur any costs associated with LEP-directed interpreter services.

**305 - Use of Family and Friends** - Use of family or friends as interpreters is not the preferred method of providing interpreter services. However; when the worker has determined that it is not feasible to use formalized interpreter services, a consultation will be made with that worker's immediate supervisor or director. Alternative methods of customer service will need to be discussed. If the agency has determined that a family member, friend or other responsible party can adequately perform the interpreter service, approval may be given. Consideration will be given of the following factors: 1. the client's data privacy rights will be protected, 2. the quality of the interpreter services to be provided by the family member or friend will be acceptable, and 3. participation of a family member or friend is appropriate given the nature of the contact (ex: child protection assessments). The agency will document the extenuating circumstances for use of family or friends. Under no circumstances may minor children be used for interpreter services.

**306 - Competency Standards for Interpreters** - Any interpreter used for LEP services must be bilingual: fluent in English and fluent in the language of the customer needing the service. When using well-recognized interpreter services provided from a recognized agency - such as Language Line Services, competency is presumed. When using family, friends or significant others, the intake worker must make a judgment as to the competency of the proposed interpreter. "Certification" as an interpreter is not a prerequisite.

**307 - Dissemination of LEP Plan** - Copies of the LEP Plan will be provided to the following: all MCSS employees who have direct customer contact (An email will notify staff that policy is updated and is on our shared drive when needed for access. This is also discussed at least annually at staff meetings), Western MN Legal Services, Meeker County Public Health Service, and the Meeker County Courthouse.

**308 - Services to Illiterate** - When confronted with a situation in which the customer cannot read or write in his or her native language - it is incumbent that MCSS find a suitable interpreter, one who can assist the person in completion of necessary forms, documents and the like. The MCSS intake worker needs to make the determination, in conjunction with the interpreter, about the customers' literacy skills. The clear choice in dealing with cases of illiteracy will be to have an on-site interpreter. It may be necessary to schedule interviews when face-to-face interpreter services can be provided. Use of the ITV, faxing of forms, and over-the-phone services may be required on a case-by-case basis.

**309 - Emergency Situations** - When a determination has been made that an emergency exists and LEP considerations are identified as being present, MCSS may waive all procedures in order to insure that necessary emergency services are provided. Extraordinary efforts need to be put forth before circumventions of non-emergency procedures are followed. Consultation with a Supervisor or the Director is necessary before such action is taken. In On Call situations, The Language Line Service should be accessed by the worker without consultation with the Supervisor or Director when determined necessary.

**310 - Access to and Costs of Interpreters** - Under no circumstances will MCSS indicate - either verbally or in writing - that any applicant or client in need of LEP services will be charged for interpreter or translation services. All such services will be at no expense to the applicant or client. Such services will be provided during all normal business hours and when necessary, during non-business hours when an emergency has been determined to exist.

**311 - Notice of Service Availability** - LEP clientele will be informed of the availability of free interpreter and translation services at the point when it appears that the customer is not able to communicate in English. Notice of service availability will come from the public notice document in the central reception area. Distribution of the LEP Plan to various parties cited above will help in putting those entities on notice that interpreter and translation services are available on a timely basis and free of charge. Insofar as the Department of Human Services has translated many forms into multiple languages, MCSS will make them available automatically to LEP clientele. Access to the Department's website at [www.dhs.state.mn.us/forms](http://www.dhs.state.mn.us/forms) will be made.

**312 - County-Produced Materials** - Insofar as the LEP census in Meeker County is low in all languages, it is not anticipated that MCSS will develop any internal materials. Rather, MCSS will rely on the state-produced documents as the primary source of translated materials. Downloading of documents from the DHS web-page will also be used as necessary. MCSS will follow DHS's translation numerical guidelines as required.

**313 - Complaint Resolution Protocol** - Any adverse action taken by MCSS with which an applicant or recipient disagrees is subject to complaint. MCSS has a formal complaint process that can be utilized to try to resolve any dispute. In the absence of local resolution, the person making the complaint will be informed in a language understandable to the grievant, of the process to follow in making a complaint to DHS or the Office of Civil Rights. The complaint procedure will conform in all respects to the extant MCSS procedure included in Civil Rights Compliance Requirements. Appropriate use of interpreter services with Language Line Services to facilitate the dispute resolution process will take place. All such complaints can be made to any of the parties listed at the top of this LEP Plan.

**314 - Posting** - A copy of the MCSS LEP Plan will be posted on the county website.

#### **400 - Training**

**401 - Distribution of LEP Plan** - All MCSS employees are given a copy of the document via email and notified of the location in the shared drive in agency file and on our website.

**402 - Training of Staff - Initial** - For any new employee affected by the LEP Plan, this document will be incorporated into that person's "generic orientation" protocol at the time of hire.

**403 - Training of Staff - Ongoing** - On at least an annual basis at each unit's staff meeting, a review of the LEP Plan will take place.

#### **500 - Monitoring**

**501 - Evaluation of the LEP** - On at least an annual basis, the LEP Plan will be reviewed for effectiveness. This review will normally take place toward the end of the calendar year. It will be coordinated by the MCSS LEP Coordinator. The evaluation will involve consultation with representatives of each unit to determine compliance with the LEP Plan, identification of any problem areas and development of required corrective action strategies. Elements of the evaluation will include the following:

- number of persons with LEP in Meeker County
- assessment of current language needs of MCSS applicants and clients to determine if clients needing an interpreter and/or translated materials are receiving needed assistance
- updating case files which lack information about a client's language preference; determining if clients need to be asked their language preference at the time of certification and recertification
- determining whether existing assistance is meeting the needs of applicants and clients with LEP
- assessing whether staff members understand MCSS LEP policies and procedures and how to carry them out, and whether language assistance resources and arrangements for those resources are still current and accessible

**502 - LEP Contact Person** -For purposes of the LEP Plan, Meeker County's designated contact person is the Director with appropriate delegation made to all agency supervisors.

**APPENDIX 3:**  
**CIVIL RIGHTS ASSURANCE  
OF COMPLIANCE**

MINNESOTA DEPARTMENT OF HUMAN SERVICES  
CIVIL RIGHTS ASSURANCE OF COMPLIANCE

NONDISCRIMINATION IN STATE AND FEDERALLY FINANCED PROGRAMS

MEEKER COUNTY SOCIAL SERVICES  
(HEREAFTER CALLED THE "COUNTY AGENCY")

THE COUNTY AGENCY provides this civil rights Assurance of Compliance (hereafter called the "Assurance") in consideration of and for the purpose of obtaining any and all federal financial assistance from the United States Departments of Health and Human Services and Agriculture. The County Agency agrees that compliance with this Assurance is a condition of continued receipt of federal financial assistance and that it is binding upon the County Agency directly or through contract, license, or other provider of services, as long as it receives federal or state financial assistance; and shall be submitted with the required Comprehensive Civil Rights Plan update.

THE COUNTY AGENCY ASSURES that it will comply with:

Title VI of the Civil Rights Act of 1964, as amended; Department of Health and Human Services, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons; Age Discrimination Act of 1975, 42 U.S.C. 6101, as amended; Section 504 of the Rehabilitation Act of 1973, as amended; Section 508 of the Rehabilitation Act of 1973, as amended; Title II of the Americans with Disabilities Act of 1990; Section 1557 of the Patient Protection and Affordable Care Act of 2010; Federal Block Grant Programs of the Omnibus Budget Reconciliation Act of 1981, as amended; Title IX of the Education Amendments of 1972, as Amended; Family Violence Prevention and Services Act; Food Stamp Act of 1977, as amended, including the Nondiscrimination Compliance Requirements in the Food Stamp Program and the Bilingual Requirements in the Food Stamp Program; FNS Instruction 113-1, Civil Rights Compliance and Enforcement – Nutrition Programs and Activities, Food and Nutrition Service, U.S. Department of Agriculture (2005); and Interethnic Adoption Provisions of the Small Business Job Protection Act of 1996 (formerly Multiethnic Placement Act of 1994).

PURSUANT TO THE CIVIL RIGHTS PLAN for the Minnesota Department of Human Services, by accepting this Assurance, the County Agency agrees to allow access, by authorized personnel of the Minnesota Department of Human Services and the United States Departments of Health and Human Services and Agriculture, during normal working hours, to private and/or confidential data maintained by the County Agency (or other sub-recipient of federal financial assistance) to the extent necessary to conduct a full and complete investigation into any complaint of discrimination, including to compile data, maintain records and submit reports as required to determine compliance with the above mentioned laws, rules and regulations. The Minnesota Department of Human Services agrees to comply with all requirements or the Minnesota Government Data Practices Act (Minnesota Statutes, section 13.01 *et seq.*). No

private and/or confidential data collected, maintained, or used in the course of an investigation shall be disseminated except as authorized by statute, either during the period of the investigation or after it has been concluded. If there are any violations of this assurance, DHS shall have the right to invoke fiscal sanctions or other legal remedies in accordance with Minnesota Statutes, section 256.017.

THE PERSON WHOSE SIGNATURE APPEARS BELOW is authorized to sign this Assurance and commit the County Agency to its terms.

7/28/16  
Date

[Signature]  
Director's Signature

I CERTIFY that the signatory for the County Agency has lawful authority to bind the County Agency to the terms of this civil rights Assurance.

7/28/2016  
Date

[Signature]  
County Attorney's Signature

MINNESOTA DEPARTMENT OF HUMAN SERVICES  
**CIVIL RIGHTS ASSURANCE OF COMPLIANCE FOR COUNTY HUMAN SERVICE AGENCIES**  
(Nondiscrimination in State and Federally Financed Programs)

**County Agency:** \_\_\_**Meeker County**

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ASSURANCE OF COMPLIANCE WITH TITLE VI OF THE CIVIL RIGHTS ACT OF 1964; SECTION 504 OF THE REHABILITATION ACT OF 1973; TITLE IX OF THE EDUCATION AMENDMENTS OF 1972; AGE DISCRIMINATION ACT OF 1975; CURRENT VERSION OF USDA'S FNS INSTRUCTION 113-1/CIVIL RIGHTS COMPLIANCE AND ENFORCEMENT, NUTRITION PROGRAMS AND ACTIVITIES FOOD AND NUTRITION SERVICE; ALL OTHER FEDERAL NONDISCRIMINATION LAWS, REGULATIONS, POLICIES, INSTRUCTIONS AND GUIDANCE; AND THE MINNESOTA HUMAN RIGHTS ACT

The County Agency provides this assurance in consideration of and for the purpose of obtaining Federal financial assistance from the U.S. Department of Agriculture (USDA) to operate the Supplemental Nutrition Assistance Program in Minnesota on behalf of the Minnesota Department of Human Services (DHS).

THE COUNTY AGENCY AGREES THAT IT WILL COMPLY WITH:

1. Title VI of the Civil Rights Act of 1964, 42 USC §2000d et seq., as amended, and all requirements imposed by or pursuant to the regulation at 7 CFR Part 15, Subpart A and Subpart C. In accordance with Title VI and the Regulation, no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity for which the County Agency receives Federal financial assistance from USDA/DHS.
2. Section 504 of the Rehabilitation act of 1973, 29 USC § 794, as amended, and all requirements imposed by or pursuant to the regulation at 7 CFR Part 15b. In accordance with Section 504 of that Act and the Regulation, no otherwise qualified individual with a disability in the United States shall, solely by reason of her/his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity for which the County Agency receives Federal financial assistance from USDA/DHS.
3. Title IX of the Education Amendments of 1972, 20 USC § 1681 et seq., as amended, and all requirements imposed by or pursuant to the regulation at 7 CFR Part 15a. In accordance with Title IX of that Act and the Regulation, no person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any education program or activity for which the County Agency receives Federal financial assistance from USDA/DHS.
4. Age Discrimination Act of 1975, 42 USC §§ 6101-6107, as amended and all requirements imposed by or pursuant to the regulation at 45 CFR Part 91. In accordance with the Age Discrimination Act and the Regulation, no person in the United States shall, on the basis of age, be denied the benefits of, be excluded from participation in, or be subjected to discrimination under any program or activity for which the County Agency receives Federal financial assistance from USDA/DHS.
5. Current version of USDA's FNS Instruction 113-1, Civil Rights Compliance and Enforcement – Nutrition Programs and Activities, Food and Nutrition Service, issued November 8, 2005. The purpose of Instruction 113-1 is to establish and convey policy and provide guidance and direction to the USDA Food and Nutrition Service

(FNS) and its recipients and customers and ensure compliance with and enforcement of the prohibition against discrimination in all FNS nutrition programs and activities, whether federally funded in whole or not. FNS Instruction 113-1 incorporates the above Federal legal authorities.

6. Minnesota Human Rights Act found at Minnesota Statutes, Chapter 363A, specifically § 363A.11, Public Accommodations and § 363A.12, Public Services. In Minnesota, it is an unfair discriminatory practice to deny any person the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of a place of public accommodation because of race, color, creed, religion, disability, national origin, marital status, sexual orientation, or sex. Additionally, it is an unfair discriminatory practice to discriminate against any person in the access to, admission to, full utilization of or benefit from any public service because of race, color, creed, religion, national origin, disability, sex, sexual orientation, or status with regard to public assistance.

THE COUNTY AGENCY AGREES THAT BY ACCEPTING THIS ASSURANCE, it will compile data, maintain records, and submit reports, as required, to permit effective enforcement of the nondiscrimination laws and permit authorized USDA personnel and other authorized personnel, such as DHS personnel, during normal working hours to review such records, books, and accounts as needed to ascertain compliance with the nondiscrimination laws. If there are any violations of this assurance, USDA shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the County Agency and its successors, transferees, and assignees, as long as they receive Federal financial assistance or retain possession of any assistance from DHS/USDA.

THE COUNTY AGENCY AGREES THAT BY ACCEPTING THIS ASSURANCE, it will obtain a written statement of assurance from its SNAP-related contractors and vendors assuring that they will also operate in compliance with all of the stated nondiscrimination laws, regulations, instructions, policies, and guidance.

**The person whose signature appears below is authorized to sign this assurance and commit the County Agency to the above provisions.**

5/31/2017

\_\_\_\_\_  
Date

Paul Bukovich, Director



\_\_\_\_\_  
Name and Title of Authorized Official (please print)

\_\_\_\_\_  
Signature of Authorized Official

Meeker County Social Services

\_\_\_\_\_  
Name of County Agency

114 N Holcombe Ave, Ste.180 Litchfield, MN 55355

\_\_\_\_\_  
Street Address, City, State, Zip Code

S

**Please deliver Assurance to:**  
Civil Rights Coordinator  
Minnesota Department of Human Services, Equal Opportunity and Access Division

P.O. Box 64997, St. Paul, MN 55164-0997  
[joann.dasilva@state.mn.us](mailto:joann.dasilva@state.mn.us)

**2019-2021 STATE-COUNTY CIVIL RIGHTS ASSURANCE AGREEMENT**

The County Agency: Meeker County Social Services agrees to comply with the civil rights assurance of compliance (hereafter “Civil Rights Assurance Agreement”) as a condition of receiving Federal financial assistance through the Minnesota Department of Human Services. The Civil Rights Assurance Agreement is binding upon the County Agency, its successors, transferees, and assignees for as long as the County Agency receives Federal financial assistance. The Minnesota Department of Human Services may enforce all parts of the Civil Rights Assurance Agreement as a condition of receipt of such funds.

Compliance by Contractors and Vendors: The County Agency further agrees that by accepting this Civil Rights Assurance Agreement, it will obtain a written statement of assurance from all of its contractors and vendors (i.e., applying to all programs), assuring that they will also operate in compliance with the stated nondiscrimination laws, regulations, policies, and guidance. The written statement of assurance from all of its contractors and vendors must be maintained as part of the County Agency’s *Comprehensive Civil Rights Plan* and must be made available for review upon request by the Minnesota Department of Human Services or the U.S. Department of Agriculture.

**RECIPIENT AGREES TO COMPLY WITH ALL APPLICABLE FEDERAL AND STATE CIVIL RIGHTS LAWS:**

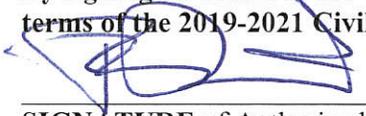
The County Agency agrees to:

1. Administer all programs in accordance with the provisions contained in the Food and Nutrition Act of 2008, as amended, and in the manner prescribed by regulations issued pursuant to the Act; implement the FNS-approved State Plan of Operation for the Supplemental Nutrition Assistance Program (SNAP); comply with Title VI of the Civil Rights Act of 1964; section 11(c) of the Food and Nutrition Act of 2008, as amended; the Age Discrimination Act of 1975; Section 504 of the Rehabilitation Act of 1973; Title II of the Americans with Disabilities Act of 1990; Title IX of the Educational Amendments of 1972; and all the requirements imposed by the regulations issued pursuant to these Acts by the U.S. Department of Agriculture to the effect that, no person in the United States shall, on the grounds of race, color, national origin, sex, age, disability, political beliefs, or religion, be excluded from participation in, be denied the benefits of, or otherwise subject to discrimination under SNAP.
2. Administer all programs in accordance with U.S. Department of Health and Human Services requirements imposed by the regulations pursuant to Title VI of the Civil Rights Act of 1964; the Age Discrimination Act of 1975; Section 504 of the Rehabilitation Act of 1973; Title II of the Americans with Disabilities Act of 1990; Title IX of the Educational Amendments of 1972; Section 1557 of the Patient Protection and Affordable Care Act of 2010. Comply with the regulations to the effect that, no person in the United States shall, on the grounds of race, color, national origin, sex, age, disability, or religion, be excluded from participation in, be denied the

benefits of, or otherwise subject to discrimination under U.S. Department of Health and Human Services programs.

3. Administer all programs in compliance with the Minnesota Human Rights Act, Public Services and Public Accommodations provisions; comply with all the requirements imposed by the Minnesota Human Rights Act to the effect that, no person in Minnesota shall, on the grounds of race, color, national origin, religion, creed, sex, sexual orientation, marital status, public assistance status, or disability, be excluded from participation in, be denied the benefits of, or otherwise subject to discrimination under the Minnesota Human Rights Act. The County Agency and the Department of Human Services further agree to fully comply with any changes in Federal law and regulations. This agreement may be modified with the mutual consent of both parties.
4. The County Agency agrees that by accepting the Civil Rights Assurance it will compile data, maintain records, books and accounts; and submit reports as required to permit effective enforcement of the nondiscrimination laws. The County Agency also agrees to permit authorized Federal and State personnel, during normal working hours, to review such records, books, accounts, and reports as needed to determine compliance with the nondiscrimination laws.

**By signing on behalf of the County Agency, I state that I am authorized to bind the County Agency to the terms of the 2019-2021 Civil Rights Assurance Agreement and commit it to the above provisions.**

  
\_\_\_\_\_  
**SIGNATURE** of Authorized Representative

Paul Bukovich \_\_\_\_\_  
Print Name

Meeker County Social Services \_\_\_\_\_  
Name of County Agency

114 N Holcombe Ave., Ste 180, Litchfield MN 55355  
Street Address, City, State, Zip Code

## **ADDENDUM**

### **Clarification of SNAP Civil Rights Requirements – Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency (LEP),” and Titles II and III of the Americans with Disabilities Act**

This addendum clarifies core civil rights requirements to ensure meaningful access to programs, services, and information for persons with Limited English Proficiency (LEP) and persons with disabilities in accordance with Federal law, regulations, and current guidance from the U.S. Department of Department of Justice (DOJ) and the U.S. Department of Agriculture (USDA).

#### **Meaningful Access for LEP Individuals**

State agencies that participate in the Supplemental Nutrition Assistance Program (SNAP) must take reasonable steps to ensure that LEP persons have meaningful access to programs, services, and benefits. This includes the requirement to provide bilingual program information and certification materials and interpretation services to single-language minorities in certain project areas. SNAP State agencies that do not provide meaningful access for LEP individuals risk violating prohibitions against discrimination

based on National Origin in the Food and Nutrition Act of 2008, as amended, Title VI of the Civil Rights Act of 1964 (Title VI), and SNAP program regulations.

**Federal LEP regulations and guidance include:**

- SNAP regulations provided by 7 CFR Part 272.4 (b), “Bilingual requirements”;
- Executive Order 13166 of August 11, 2000, “Improving Access to Services for Persons with Limited English Proficiency,” reprinted in 65 FR 50121, 50122 (August 16, 2000);
- DOJ policy guidance titled, “Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons,” published in 67 FR 41455, 41457 (June 18, 2002); and
- USDA policy guidance titled, “Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons,” 79 FR 70771-70784 (November 28, 2014).

**Four Factor Analysis for Assessing LEP Needs**

To be in compliance, the Title VI guidance provided by DOJ and USDA instructs State Agencies to assess the LEP needs of the population served and determine the LEP services required by balancing four factors:

1. The number or proportion of persons with limited English proficiency are eligible to be served or likely to be encountered within the area serviced by the recipient;
2. The frequency with which persons with limited English proficiency come in contact with the program;
3. The nature and importance of the program, activity, or service to people’s lives; and
4. The resources available to the recipient and costs.

SNAP State agencies must also comply with the specific requirements established by 7 CFR Part 272.4 (b) and should include these obligations in the LEP assessment.

**Developing an LEP Plan**

After completing an assessment of LEP needs, SNAP State agencies should develop an implementing plan to address the LEP needs of the population served. This may include contracting for oral interpretation services, hiring bilingual staff, arranging for telephone interpreters and/or language lines, coordinating community volunteers, translating vital documents, and providing written notice that language line services are available in appropriate languages. Quality and accuracy of the language service is critical in order to avoid serious consequences to the LEP person and to the recipient. LEP needs should be considered in developing State and local budgets and front line staff should understand how to obtain LEP services.

USDA’s 2014 policy guidance includes detailed information on assessing LEP needs, identifying practices for translating documents that will be seen as strong evidence of compliance. For additional assistance and information on LEP matters, please also visit <http://www.lep.gov>. The website includes online LEP mapping tools designed to help assess the language needs of the population served by a particular program or facility.

### **Ensuring Equal Opportunity Access for Persons with Disabilities**

SNAP State agencies must also ensure equal opportunity access for persons with disabilities. This includes ensuring that communications with applicants, participants, members of the public, and companions with disabilities are as effective as communications with people without disabilities. State agencies that do not provide persons with disabilities equal opportunity access to programs may risk violating prohibitions against disability discrimination in the Rehabilitation Act of 1978, the Americans with Disabilities Act (ADA), and SNAP program regulations.

DOJ published revised final regulations implementing Titles II and III of the ADA on September 15, 2010. These regulations are codified at 28 CFR Part 35, "Nondiscrimination on the Basis of Disability in State and Local Government Services" and 28 CFR Part 36, "Nondiscrimination on the Basis of Disability in Public Accommodations and Commercial Facilities." In accordance with the implementing regulations, State Agencies must provide auxiliary aids and services where necessary to ensure effective communication and equal opportunity access to program benefits for individuals with disabilities. The type of auxiliary aids and services required will vary, but a State agency may not require an individual with a disability to bring another individual to serve as an interpreter, and may rely on a person accompanying a disabled individual only in limited circumstances. When a State agency communicates with applicants and beneficiaries by telephone, it must provide text telephone services (TTY) or an equally effective electronic telecommunications system to communicate with individuals who are deaf, hard of hearing, or hearing impaired. State agencies must also ensure that interested persons, including people with low vision or who are hard of hearing can obtain information as to the existence and location of accessible services, activities, and facilities. For more information, please visit the ADA website: <http://www.ada.gov>.

**Please Deliver Signed  
2019-2021 STATE-COUNTY CIVIL RIGHTS ASSURANCE AGREEMENT to:**

Civil Rights Coordinator  
Minnesota Department of Human Services  
Equal Opportunity and Access Division  
P.O. Box 64997  
St. Paul, MN 55164-0997  
[joann.dasilva@state.mn.us](mailto:joann.dasilva@state.mn.us)