

Civil Rights Training for The Community Supplemental Food Program



WISCONSIN DEPARTMENT
of HEALTH SERVICES

Civil Rights Goals

- Equal treatment for applicants and beneficiaries.
- Knowledge of rights and responsibilities.
- Elimination of illegal barriers.
- Dignity and respect for all.



What is Discrimination?



Discrimination is the different treatment of one person or group from others by actions or lack of actions based on a protected class.

<https://www.doi.gov/employees/anti-harassment/definitions>

What is a Protected Class?

CSFP prohibits discrimination
for these protected classes

Race

Color

National Origin
(includes
limited English
Proficiency)

Disability

Age

Gender identity
& Sexual
orientation

Filed a
complaint
previously

Religion

Civil Rights Compliance Essentials



- ✓ Public notice of service availability.
- ✓ Requirements for language assistance.
- ✓ Reasonable accommodations.
- ✓ Civil Rights training for serving customers.
- ✓ Conflict resolution methods and skills.

Civil Rights Public Information Requirements



Provide service information to the public.



Display “And Justice for All” poster in visible, customer location.



Provide USDA non-discrimination statement on program webpage, in public information, application forms, and program literature.

Program Information

- Make service information available to public.
- Inform potentially eligible person, applicants and participants of:
 - Program rights and steps for participation.
 - Changes in programs.



Required “And Justice For All” Poster



Nondiscrimination Statement

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotope, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. **mail:**
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
2. **fax:**
(833) 256-1665 or (202) 690-7442; or
3. **email:**
Program.Intake@usda.gov

This institution is an equal opportunity provider.

It is important to convey a message of equal opportunity in *all* materials used to provide program information:

- Webpage
- Program literature
- Eligibility form

Limited English Proficiency (LEP)



- Required for participants when English is not primary language.
- Language assistance must be accurate, timely, effective.
- No cost to the LEP person.

Language Assistance Serving LEP Households



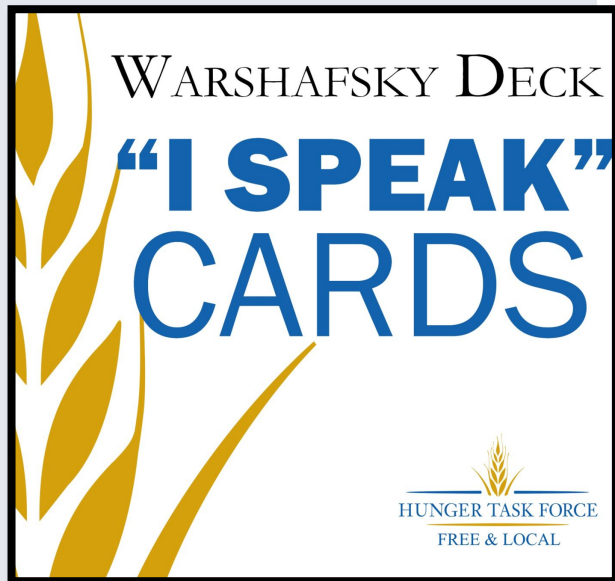
Bilingual volunteers.

Public service interpreter.

Language line or use app.

“I SPEAK” Cards

Try These...



Kuv xav tau ib tug Hmoob pab txhais lus rau kuv. I need a Hmong interpreter	ខ្ញុំត្រូវការអ្នកបកប្រែភាសាខ្មែរ I need a Khmer interpreter.
ຂ້າພະເຈົ້າ ຕ້ອງການ ລ່ານແປພາສາລາວ I need a Lao interpreter	Мне нужен русский переводчик. I need a Russian interpreter.
Turjumana afan Oromiffa enbarbana. I need an Oromiffa interpreter.	Ja treban Srpsko-Hrvatskog prevodioca. I need a Serbo-Croatian interpreter.
Waxaan u baahnahay turjubaan Somali ah. I need a Somali interpreter.	Necesito servicios de intérprete en español. I need a Spanish interpreter.
Tôi cần thông dịch viên tiếng Việt. I need a Vietnamese interpreter.	انا احتاج مترجم عربي I need an Arabic interpreter

Translation Resources

Instruction Card: Telephone Interpreting Services

200+ Languages
Available 24/7/365
Direct Dial: 503-484-2425

NEED AN INTERPRETER?

1. Dial 1-800-CALL-CLI
(1-800-225-5254)
2. When the operator answers, tell them:
 - If you need a third-party dial-out
 - Your customer code is **696387**
 - You are calling from **Hunger Task Force**
 - The language you need
 - The **Name of Agency**
3. The operator will connect you promptly

Recommendations for Using a Telephone Interpreter

For Outbound Calls:

- If you need to reach a limited English proficient (LEP) individual at home or need a third-party dial-out, please first inform the CLI operator before the interpreter is connected.
- Once the interpreter is connected, you can tell the interpreter who to ask for (the LEP's name).
- At this time, you can also tell the interpreter how to proceed if the call goes to voicemail and what message to leave, if desired.

For Inbound Calls:

- Explain to the LEP individual that all information is confidential and encourage questions.
- Speak clearly.
- Smile and be kind; this helps the LEP individual feel more comfortable.
- If face-to-face and multiple people are in the room, speak one at a time.
- Speak freely; all CLI interpreters are sworn to confidentiality, neutrality, and the Interpreter Code of Professional Ethics.
- Encourage the interpreter to clarify terms with you if necessary.

Reasonable Accommodation

- Make “reasonable modifications” to accommodate people with disabilities.
- Disability can be physical, mental impairment which substantially limits one or more major life activities.



Right to File a Complaint



- Can be filed verbally or in writing; anonymous or not.
- Should notify local CSFP and DHS CSFP Coordinators.
- Can refer complaints directly to U.S. Dept of Agriculture (USDA) using online form.
- Complaints can be made within 180 days of the alleged discriminatory action.

Civil Rights Training for Personnel

- Training should be provided if staff have direct contact with CSFP applicants/participants.
- This presentation meets volunteer training requirement.
- Training required for new staff; then annually.
- Maintain record of presentation dates, participants.



Each time you interact with participants:

Ask yourself, am I...



- Treating people, the way I want to be treated?
- Treating the same way, I treat other people?
- Explaining rules, policies, expectations.

EXERCISES

Scenario #1



OPEN

Tuesday-Friday
9am-4pm

In order to ensure that there are interpreters available, Batesville food pantry has a rule that all Russian speaking participants be served on the second Friday of each month.

Is this a civil rights violation?

Scenario #1

Yes. You cannot prevent clients from picking up a Stockbox

Scenario #2

A person comes to your food pantry and says that the pantry at the church down the street refused to give them food because they are not a church member.

Is this a Civil Rights Violation?

Scenario #2

It depends, the church may or may not receive federal funding, but we can still help the person file a complaint.

Scenario #3



A large public agency runs a number of different programs. It distributes Stockbox and operates a food pantry that is stocked and funded without federal commodities or other federal funding.

Does the pantry have to adhere to Federal civil rights rules?

Scenario #3

Yes. No matter the amount of federal funding received, they must comply with federal Civil Rights rules.

Scenario #4

A 55-year-old person with a disability is denied food through the Stockbox program and alleges discrimination. They want to file a complaint. You know that Stockbox is for elderly people 60+ years old and that discrimination is not involved in this situation.

What should you do?



Scenario #4

Even though you know the client is not eligible for Stockbox, let the client file a complaint– never obstruct a Civil Rights filing.

Scenario #5



A man walks into a pantry that is supported by the Pentecostal Church.

He is ill and asks the volunteer if the preacher can talk to him and pray with him.

Is it okay for the pastor to say a prayer with this man?

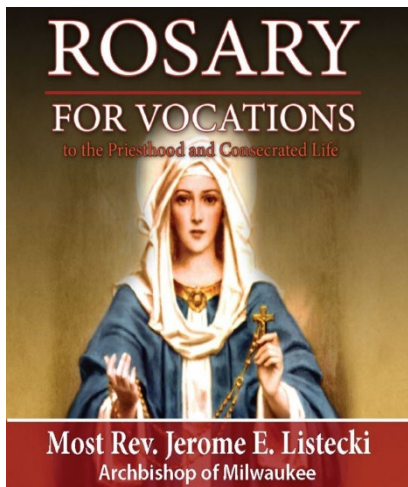
Scenario #5

Yes, however it would be ideal to move to a private space to do so.

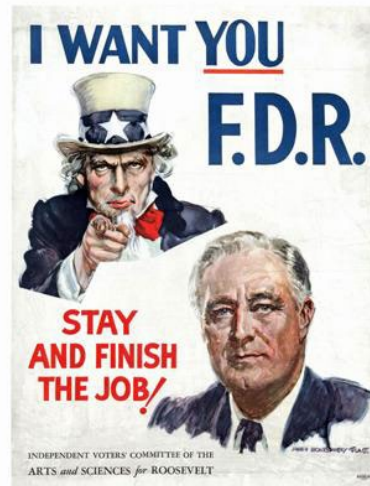
Scenario #6

An organization wants to enclose religious literature in the Stockbox.

Another organization wants to include political advertising in the Stockbox.



Is this allowed?



Scenario #6

No, you cannot include political advertising or religious literature in the Stockbox as it is a federally funded program.

Scenario #7

The neighbor of a Stockbox site has an altercation with a client of the Stockbox site while the client was departing.

After this, the neighbor went into the Stockbox site and demanded the site manager give her the client's information so she could file a complaint with the police.

Is this allowed?

Scenario #7

No, site staff are not allowed to share Personally Identifiable Information of clients with others. Client information must be kept confidential.

Scenario #8

One of your volunteers has fallen on hard times and is embarrassed by his situation. He is offered a special pick-up time for a Stockbox when the site is not open to ease his embarrassment.

Is this a civil rights violation?

Scenario #8

Yes, one cannot provide special treatment to anyone, no matter the relationship. The primary issue is that access is being provided at a time that is not offered to the general public.

Scenario #9

A reviewer from the State visits a Stockbox distribution site and sees the “And Justice For All” poster displayed in the manager’s office, which is in an area that is off limits to program applicants and participants.

Is this a Civil Rights violation?

Scenario #9

Yes, The “And Justice for All” Poster must be clearly displayed in an area available to clients.

Additional Resources

If you need additional resources, please call Hunger Task Force
at 414-777-0483 and ask for the Senior Services Team

Thank you!