



**LAC QUI PARLE COUNTY FAMILY SERVICES
COMPREHENSIVE CIVIL RIGHTS PLAN
Civil Rights and Affirmative Action/Equal Employment Opportunity (AA/EEO)**

Date: July 1, 2019

County Agency: Lac qui Parle County Family Service Center

Address: P.O. Box 7, 930 First Avenue
Madison, MN 56256

Phone: (320) 598-7594

Fax: (320) 598-7597

TTY: Dial 911 (Automatic connection via computer to TTY)

MN Relay Service: Dial 7-1-1 or 1-800-627-3529

Plan Location: Electronic Board in Office Lobby of Family Services Building

Civil Rights Plan Contact: Kirsten Gloege, Human Services Director

Phone Number: 320-598-7594

Fax Number: 320-598-7597

Email Address: kgloege@co.lac-qui-parle.mn.us

MN Relay Service: Dial 7-1-1 or 1-800-627-3529

LEP Plan Contact: Kirsten Gloege (See contact information above)

ADA Contact/Coordinator: Todd Patzer, Social Services Board, Commissioner

Phone Number: 320-598-7594

Fax Number: 320-598-7597

Email Address: todd.patzer@lqpco.com

MN Relay Service: Dial 7-1-1 or 1-800-627-3529

ADA Advisory: This publication is available in alternative formats upon request. Please contact Lac qui Parle County Family Services listed above.

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A. Purpose of Civil Rights Plan:

- a) To inform the public about the Agency's intent to protect the rights of all people in Lac qui Parle County to receive health and human services without discrimination on the basis of race, color, national origin, disability, age, sex, religion and political beliefs. A booklet explaining what you should know about fair treatment in service delivery is available upon request. Please ask for DHS-3276 "Civil Rights in Human Services" brochure.
- b) To inform providers who contract with Family Services to adopt the same protections to assist and support vulnerable people and to comply with civil rights law.

B. Legal References:

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

C. Lac qui Parle County Equal Opportunity in Service Delivery Policy:

Protected Classes: No otherwise qualified applicant for service or client shall be excluded from participation, be denied benefits or otherwise be subjected to discrimination in any manner on the basis of race, color, national origin, sex, sexual orientation, age, creed, religion, political beliefs, disability, status with regard to public assistance. 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 covers eligibility for and access to service delivery and treatment in all of our health and human services programs and activities for applicants, clients and members of the public. It applies to all programs and services carried out by other public and private agencies or providers under contracts with the county or state, licenses or other arrangements.

Prohibited behavior: Lac qui Parle County Family Services prohibits discrimination in any of the following areas: Deciding who will be approved or have access to any financially assisted program or activity; deciding who will be provided opportunities in receiving prompt and courtesy services; or allowing or engaging in any form of discriminatory harassment as prohibited by federal, state, and local human rights laws.

If you believe you have been discriminated against, you may file a complaint with the Minnesota Department of Human Services. You may call or write to:

DHS Civil Rights Coordinator
Minnesota Department of Human Services
Equal Opportunity and Access Division
P.O. Box 64997
St. Paul, MN 55164-0997
(651) 431-3040 (voice)
(651) 431-3041 (tty)
(651) 431-7444 (fax)
(800) 627-3529 (Minnesota Relay Service)
(877) 627-3848 (Speech-to-Speech Relay)

This policy is posted on the electronic board in the front lobby of the Family Service Center located at 930 First Avenue, Madison, MN 56256.

D. Lac qui Parle County's Referral Complaint Resolution Procedure:

You have the right to file a discrimination complaint with Lac qui Parle County Family 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).

Lac qui Parle County Family 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.

Lac qui Parle County Family Services
P.O. Box 7, 930 First Avenue
Madison, MN 56256
Phone: (320) 598-7594
Fax: (320) 598-7597
TTY: Dial 911 (Automatic connection via computer to TTY)
MN Relay Service: Dial 7-1-1 or 1-800-627-3529

Or contact:

DHS Civil Rights Coordinator
Minnesota Department of Human Services
Office of Equal Opportunity
P O 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 North Robert Street
St. Paul, MN 55155

651-539-1100 (Voice)
800-657-3704 (Toll Free)
711 800-627-3529 (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 North Michigan Avenue
Suite 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, 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 Avenue, SW
Washington, D.C. 20250-9410
- (2) Fax: (202) 690-7442; or

(3) Email: program.intake@usda.gov.

This institution is an equal opportunity provider.

E. Lac qui Parle County Family Services Compliance with ADA Requirements for the Public:

Lac qui Parle County Family Services posts an ADA notice on its electronic board in the front lobby of the Family Service Center. This informs the public that the agency does not discriminate on the basis of disability, provides information about rights and protections and includes information about the agency's ADA contact.

Title II of the ADA protects qualified individuals with disabilities from discrimination on the basis of disability in the services, program, or activities of all state and local governments. Additionally, the ADA extends the prohibition of discrimination on the basis of disability, established by Section 504 of the Rehabilitation Act, to all activities of state and local governments, including those that do not receive federal financial assistance.

Lac qui Parle County Family Service Center posts the DHS ADA brochure: Do you have a disability? (DHS-4133) in the front lobby for accessibility by the public. This brochure provides required disability rights information. For public access to this brochure over the internet, the web address is: <https://edocs.dhs.state.mn.us/lfserver/Public/DHS-4133-ENG> .

F. Lac qui Parle County Family Service Agency's Equal Opportunity Policies and Procedures including Equal Access for People with Disabilities:

Equal Opportunity Policy: It is the policy of Lac qui Parle County Family Services to make sure that program benefits and services are available to everyone and provided to all eligible individuals without discrimination, in compliance with civil rights laws.

Lac qui Parle County employees, services, programs, benefits and policies will not discriminate against applicants, clients or members of the public because 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, such as Medical Assistance, CHIP programs, health clinics, insurance companies and state health insurance exchanges.

This policy covers Lac qui Parle County's full range of services, programs and benefits, including, but not limited to, access to information about services, eligibility determinations and intake, admission procedures and treatment. The policy applies to the agencies and providers receiving federal and state funds under contracts, licenses and other arrangements with Lac qui Parle County. The Minnesota Human Rights Act also

applies to the work of Lac qui Parle County and those agencies carrying out the work of Lac qui Parle County.

Program Accessibility Policy for People with Disabilities: Lac qui Parle 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, Lac qui Parle 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 Lac qui Parle County Family Services building.
- Level access into Lac qui Parle County Family Services building with it's single story structure.

Reasonable Modifications to Policies, Procedures or Practices: Lac qui Parle County Family Services will make reasonable modifications to its policies, procedures or practices when necessary to avoid discrimination on the basis of disability, unless Lac qui Parle 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: Lac qui Parle County Family Services 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, Lac qui Parle 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, Lac qui Parle County will give primary consideration to the requests of people with disabilities. Lac qui Parle 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, Lac qui Parle County will find another equally effective auxiliary aid or service.

Procedures with auxiliary aids or services:

1. **Identification and assessment of need:** When an individual self-identifies as a person with a disability that affects the ability to communicate or to access or manipulate written materials or requests an auxiliary aid or service, staff will consult with the individual to determine what aids or services are necessary to provide effective communication in particular situations.

2. Provision of Auxiliary Aids and Services:

A. For Persons whom are Deaf or Hard of Hearing:

- (i) For persons who are deaf/hard of hearing and who use sign language as their primary means of communication, the front office support staff or is responsible for contacting the DHHS East/West Regional office for Deaf and Hard of Hearing for effective interpretation or arranging for a qualified interpreter when needed. Contact information is as follows:

East/West Central
3400 First St. N., Suite 302
St. Cloud, MN 56303
Voice: 320-223-7130
Voice toll-free: 800-456-3690
Video phone: 320-227-2550
TTY: 866-488-3909
Fax: 651-431-7777
Email: dhhs.stcloud@state.mn.us:

- (ii) Communicating by Telephone with Persons Who Are Deaf or Hard of Hearing: Lac qui Parle County Family Services utilizes relay services for external telephone with TTY users. We accept and make calls through a relay service. The state relay service number is listed on the title page.

- (iii) For the following auxiliary aids and services, staff will contact DHHS East/West Regional office for Deaf and Hard, which is responsible to provide the aids and services in a timely manner: Staff may request note-takers; computer-aided transcription services; telephone handset amplifiers; written copies of oral announcements; assistive listening devices; assistive listening systems; telephones compatible with hearing aids; closed caption decoders; open and closed captioning; telecommunications devices for deaf persons (TDDs); videotext displays; or other effective methods that help make aurally delivered materials available to individuals who are deaf or hard of hearing.
- (iv) Some persons who are deaf or hard of hearing may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the person will not be used as interpreters unless specifically requested by that individual and after an offer of an interpreter at no charge to the person has been made by the facility. Such an offer and the response will be documented in the person's file. If the person chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, competent interpreter services will be provided. NOTE: Children and other residents will not be used to interpret, in order to ensure confidentiality of information and accurate communication.

B. For Persons Who are Blind or Who Have Low Vision:

- (i) Staff will communicate information contained in written materials concerning treatment, benefits, services, waivers of rights, and consent to treatment forms by reading out loud and explaining these forms to persons who are blind or who have low vision.
- (i) For the following auxiliary aids and services, staff will contact the Marshall Office for State Services to the Blind, which is responsible to provide the aids and services in a timely manner. Contact information is as follows:

State Services to the Blind
Lyon County Courthouse
607 West Main Street
Marshall, MN 56258
Phone: 507-576-4045; Toll Free: 1-800-366-4813
Fax: 507-537-7977
TTY: 507-537-6061

The following aids are available: Qualified readers; reformatting into large print; taping or recording of print materials not available in alternate format; or other effective methods that help make visually delivered materials available to individuals who are blind or who have low vision. In addition, staff are available

to assist persons who are blind or who have low vision in filling out forms and in otherwise providing information in a written format.

C. For Persons with Speech Impairments: To ensure effective communication with persons with speech impairments, staff will provide writing materials; typewriters; TDDs; computers; flashcards; alphabet boards; communication boards and other communication aids at their disposal.

D. For Persons with Manual Impairments: Staff will assist those who have difficulty in manipulating print materials by holding the materials and turning pages as needed.

G. Limited English Proficiency (LEP) Plan:

Lac qui Parle County completed a review of its LEP effective 6/1/19 to include the new complaint procedure. The plan contains points of contact, list of resources, processes for accessing language line assistance services, notice of rights, affirmative action, complaint resolution protocol, and provision for vigilant monitoring of the plan. This plan is herein incorporated into the comprehensive civil rights plan.

Copies of the LEP Plan are available at the front desk of the Family Services Center, and noted on the electronic board display in the front lobby. Copies of the plan have also been distributed to all employees who have direct customer contact, the SW MN Workforce Council, Countryside Public Health Service, County Attorney & Court Administrator's Office.

Legal References: This document serves as the Lac qui Parle County Family Service's plan to meet the legal obligation of language access requirements in compliance with both federal and state laws. Citation of legal references is found on pages 2-3 of the Comprehensive Civil Rights Plan.

Agency Commitment: LqPFSC abides by all civil rights laws. It recognizes the importance of providing meaningful access to all persons, including persons with LEP, to the various state and federal programs it administers locally. LqPFSC is in conformance with DHS Bulletin #18-89-01, which was issued April 9, 2018.

I. Assessment and Identification of Languages Likely to be Encountered:

A. Needs Assessment:

The Lac qui Parle County Family Service Center (LqPFSC) will on an annual basis make a needs assessment of the language needs of customers. The agency will review data from our two major school districts in the county. The agency will also consult with community agencies, such as Southwest Minnesota Workforce Council, Countryside Public Health Service, Court Services about language needs in the community. Consultations will aim at trying to discern the types of non-English languages that are most predominant in Lac qui Parle County and which constitute

significant populations that the County serves or those that may be eligible for county administered services. Lac qui Parle County also will consider any client utilization data generated by the Department of Human Services that would assist in the identification of Limited English speakers. The agency also reviewed the most recent Census Data generated in the 2010 Census. The following languages have been identified as languages most likely to be encountered: Spanish.

B. Documenting Language Preference Data on Client:

County workers will identify access to interpretive services. Identifying 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 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.

C. Points of Contact:

The greatest likelihood of need for interpreter services will be at the point of intake -at the time of an emergency or application for financial assistance. The principal point of contact will most likely be, therefore, in the office setting in Madison, the county seat of Lac qui Parle County. The most appropriate form of interpreter services will likely be language assistance in completion of an application for financial assistance or health care. The other point of contact may involve field-based contact when conducting child protection assessments. These contacts will typically take place in the home of the child's caretaker or parent.

D. Resources Needed:

LqPFSC will utilize its contract with either Lucero Spanish Language Services in Bellingham, MN or the Private Industry Council in Montevideo, MN for Spanish interpreter services. Additionally, LqPFSC may use Language Line Services for other language interpretation (1-800-367-9559) and other providers as appropriate.

Language Line Services provides over the phone interpretation services for 140 languages, 7 days a week. Access is toll-free by calling 1-800-367-9559. We will use Language Line at the time an individual is determined to have LEP and for walk-in clients with language assistance needs.

The process to use when accessing language assistance services is as follows:

1. Refer to your language Identification Card for instructions. When face to face with a customer, use the card to help you identify what language a person

speaks. The card list languages commonly encountered in the United States and Canada, grouped by regions of the world. Guess what part of the world the customer is from, and open the card to that section and show the person the languages listed. Have the customer point to or identify his language.

2. Call the language line, phone #1-800-367-9559, and select the language you need, following the instructions on the next panel of this card. The representative can help you identify the language if you are unsure.
3. To reach an interpreter, press 1 for Spanish or press 2 for all other languages. Say the language name and press 1 to confirm. Enter your 6-digit client ID, # (confidential) on the telephone keypad. Enter your numeric Access Code, #(confidential) followed by the pound sign (#) on the telephone keypad. When the interpreter joins the call, provide any special instructions and explain which communication method you will be using, i.e. using a speakerphone. Add the non-English speaker to the line after you brief the interpreter.

LqPFSC will utilize its contract with either Lucero Spanish Language Services in Bellingham, MN or Private Industry Council in Montevideo, MN for either over the phone or in-person interpretation services for Spanish language only. Arrangements for in-person interpreting should be made when there is exchange of complex information about program requirements and when there is sufficient notification time to arrange for an on-site interpreter. The closest available Spanish interpreter is 10 miles from the Agency. Use of reciprocal faxing processes will be used when necessary to facilitate completion of applications and processing of interviews.

E. Range of Oral Language Assistance:

With Spanish being identified as the primary non-English language in Lac qui Parle County, use of either Lucero Spanish Language Services or Private Industry Council services is seen as encompassing close to 99% of the LEP needs of LqPFSC. Subsidiary use of Language Line Services for all other non-English language will take place as necessary.

F. Timely Access:

Lucero Spanish Language Services and the Private Industry Council services are available during customary business hours, Monday through Friday, 8:00AM to 4:30PM. Language Line Services are available 24 hours a day, 7 days per week. Contact with either entity will be made by 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.

II. Development of a Comprehensive Written Policy on Language Access:

A. Notice of Rights:

LqPFSC will take advantage of the ten (10) brief "notice of rights to language services" documents for persons with LEP as they are made available by the Department of Human Services.

B. Uncommon Languages:

There may be circumstances when customers present for services who use a language other than English which is most commonly used in Lac qui Parle County. There may be languages such as Spanish, Russian, Hmong, Vietnamese, Khymer/Cambodian, Lao, Somali, Arabic, Oromo, Serbo-Croatian. Receptionist staff will refer all such cases to the Financial Assistance Supervisor or Director. These people will be responsible for trying to determine what 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.

C. Affirmative Action:

The LqPFSC 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.

D. Use of Family and Friends:

LqPFSC may expose itself to liability under Title VI if it requires, suggests, or encourages a client with LEP to use friends, minor children, or family members as interpreters because family, friends, or minor children may not be competent to serve as interpreters. Consequently, the agency will suggest alternative methods of customer service via the resources available to the agency identified in policy section 1.D. Should the client still prefer that a family member, friend or other responsible party perform the interpreter service, the intake worker can consent to this method if doing so will not compromise the effectiveness of the interpretation and/or violate the client's confidentiality.

The worker will need to document in the case file the extenuating circumstances for use of family or friends, particularly that the family was offered other interpreter services and that the client insisted that a family member or friend be used.

E. Rule for Minor Children:

Under no circumstances may minor children be used for interpreter services.

F. Competency Standards for Interpreters:

LqPFSC contracts for interpreter services to ensure interpreters are trained and demonstrate competency. To be competent to provide interpreter services, the interpreter must be proficient in both English and the target language and be able to convey information in both languages accurately, have had orientation/training that includes the skills and ethics of interpreting, have basic knowledge in both languages of specialized program terms or concepts, and be sensitive to the client's culture.

When using well-recognized interpreter services provided from recognized agencies such as Lucero Spanish Language Services, the Private Industry Council and 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 a professional interpreter is not a pre-requisite.

G. Dissemination of LEP Plan:

Copies of the LEP Plan will be provided to the following: all LqPFSC employees who have direct customer contact, Southwest Minnesota Workforce Council, Countryside Public Health Service, and Lac qui Parle County Attorney & Court Administrator Offices. A copy will be prominently displayed on the electronic board in the LqPFSC lobby.

H. Services To Illiterate Persons:

When confronted with a situation in which the customer is illiterate -cannot read or write in his or her native language -it is incumbent that LqPFSC find a suitable interpreter, one who can assist the person in completion of necessary forms, documents and the like. The LqPFSC 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. Faxing of forms and over-the-phone services may be required on a case-by-case basis.

I. Emergency Situations:

When a determination has been made that an emergency exists and LEP considerations are identified as being present, LqPFSC will insure that necessary emergency services are provided the same day. Extraordinary efforts need to be put forth before circumvention of non- emergency procedures are followed. Consultation with the Financial Assistance Supervisor or the Director is necessary before such action is taken.

J. Access To and Costs of Interpreters:

Under no circumstances will LqPFSC 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 shall 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.

K. Affirmatively Informing Clients of Free Interpreter Services:

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 LEP plan located on the electronic board in the lobby. 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.

Use of material that has been translated into Spanish will be used immediately when it has been determined that the person presenting for service is Spanish speaking and not able to understand English.

L. County Distribution of Written Translated Materials:

LqPFSC stocks a number of state documents and forms which are available in languages other than English. It will be updated by DHS as the need arises.

LqPFSC staff will access translated documents/forms at the searchable document library (eDocs) at <http://mn.gov/dhs/general-public/publications-forms-resources/edocs/index.jsp> At the appropriate times, LqPFSC staff must send clients the preferred forms automatically when the same forms are sent to clients automatically in English.

Insofar as the LEP census in Lac qui Parle County is not significant, it is not anticipated that LqPFSC will develop any county-produced material. Rather, LqPFSC will rely on the state-produced documents as the primary source of translated materials.

M. Complaint Resolution Protocol:

The agency uses the same complaint resolution procedure found on pages 4-5 of the Comprehensive Civil Rights plan.

N. Posting:

A copy of the LqPFSC LEP Plan is found in the Comprehensive Civil Rights Plan which is posted on the electronic board in the lobby.

III. Training of Staff

A. Distribution of LEP Plan:

All LqPFSC employees who have direct contact with customers will be provided a copy of the LEP Plan upon its adoption. If any changes are made in the document, a revised copy will also be provided to the same employees.

B. Training of Staff –Initial:

With approval of the revised LEP Plan which is integral to the 2019 Comprehensive Civil Rights Plan, there will be initial training on the document. This training will take place for current staff in the context of an in-service meeting. For any new employee affected by the LEP Plan, this document will be incorporated into that person's initial orientation at the time of hire.

C. Training of Staff –Ongoing:

On at least an annual basis at a general staff meeting, a review of the LEP Plan will take place.

IV. Vigilant Monitoring of LEP Plan:

A. Evaluation of the LEP:

On at least an annual basis, the LEP Plan will be reviewed for effectiveness. This review will normally take place promptly upon notice from Alejandro Maldonado, Limited English Proficiency (LEP) Coordinator at DHS. It will be coordinated by the agency director. The evaluation will involve consultation with representatives of the Financial Services Unit and Social Services Unit to determine compliance with the LEP Plan, identification of any problem areas and development of required corrective action strategies. Elements of the evaluation may include the following:

- Number of persons with LEP in Lac qui Parle County.
- Assessment of current language needs of LqPFSC applicants and clients to determine if the clients needs an interpreter and/or translated materials; 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.
- Determination whether existing assistance is meeting the needs of applicants and clients with LEP.
- Assessing whether staff members understand LqPFSC 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.
- Seeking and obtaining feedback from non-English or limited-English speaking communities in Lac qui Parle County including applicants and clients as well as any known community organization or advocacy group working with non-English or limited- English speaking communities.

B. LEP Contact Person:

For purposes of the LEP Plan, Lac qui Parle County's designated contact person is the Director with appropriate delegation made to both the Financial Assistance Supervisor and the Affirmative Action Officer of the agency.

This information is available in accessible formats for individuals with disabilities by calling 651-431-2911. Individuals may also email DHS.info@state.mn.us or call 800-657-3739 or by use their preferred relay service.

H. Annual SNAP Civil Rights Training:

The agency will conduct SNAP (Supplemental Nutrition Assistance Program) civil rights training on an annual basis with updated policies and procedures provided by the MN Dept. of Human Services. These directives may be in the form of webinars, bulletins, PowerPoint presentations or other educational materials developed by the department.

All staff who administer the SNAP program must attend the training as well as staff who come in direct contact with the public, such as office support specialists and supervisor. Training may be in person, on-line or through a training packet that staff can read through and then sign off to indicate that they have read the training materials.

The Financial Assistance Supervisor will document when the training took place and who attended as required for SNAP Management Evaluation Reviews.

I. Civil Rights Assurance of Compliance:

A copy of the MN Dept. of Human Services Civil Rights Assurance of Compliance is found in Attachment A.

J. Civil Rights Plan Administration:

The comprehensive civil rights plan is posted on the electronic board in the front lobby at the Family Service Center, where it is available to applicants, clients, and members of the public. The following documents will be posted:

1. Equal Opportunity Policy;
2. Complaint Resolution Procedure; and
3. Disability Policy & Procedures.

It is also posted in a second location on the bulletin board by the staff copy machine where it is available to employees, volunteers and contractors.

The DHS ADA Brochure: Do you have a disability (DHS-4133 ENG) will also be posted on the electronic board in the front lobby. The actual brochure can be found on-line at <https://edocs.dhs.state.mn.us/lfserver/Public/DHS-4133-ENG>

All employees will be provided with annual training of both the Comprehensive Civil Rights Plan, which includes SNAP civil rights training, shortly after the first of the New Year in coordination with new releases of updated PowerPoint presentations made available by DHS. The date of training and list of attendees will be documented by the Financial Assistance Supervisor.

ATTACHMENT A

**MINNESOTA DEPARTMENT OF HUMAN SERVICES
CIVIL RIGHTS ASSURANCE OF COMPLIANCE
NONDISCRIMINATION IN STATE AND FEDERALLY FINANCED PROGRAMS**

LAC QUI PARLE COUNTY FAMILY SERVICE CENTER

LAC QUI PARLE COUNTY FAMILY SERVICE CENTER (LqPFSC) 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. LqPFSC agrees that compliance with this Assurance is a condition of continued receipt of federal financial assistance and that it is binding upon LqPFSC 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.

LAC QUI PARLE COUNTY FAMILY SERVICE CENTER 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, LqPFSC 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 LqPFSC (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 Bulletin #18-89-01 Date April 9, 2018, Minnesota Department of Human Services · PO Box 64238 · St. Paul, MN 55164-0238 records and submit reports as required to

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 LAC QUI PARLE COUNTY FAMILY SERVICE CENTER (LqPFSC) to its terms.

Kirsten Glaze
6/19/2019

Date

Director's Signature

I CERTIFY that the signatory for the LAC QUI PARLE COUNTY FAMILY SERVICE CENTER (LqPFSC) has lawful authority to bind LqPFSC to the terms of this civil rights Assurance.

6/26/19
Date

Richard C. Sturz
County Attorney's Signature