



Anoka County

HUMAN SERVICES DIVISION

Administration & Finance

Comprehensive Civil Rights Plan (CCRP)

August 22, 2018

Anoka County Human Services Division
Government Center, 2100 Third Avenue
Anoka, MN 55303

Administration: 763-324-1400 FAX: 763-324-1110

Civil Rights Coordinator: Cindy Cesare, 763-324-1400

ADA Coordinator: Mike Roff, 763-324-4308

Limited English Proficiency Coordinator: Tracy Schirmers, 763-324-1813

**This CCRP is posted in the lobby
next to the reception desk**

Americans with Disabilities Act Advisory

This information is available in accessible formats to individuals with disabilities. For information about equal access to services, call 763-324-4300 or use your preferred relay service.

TABLE OF CONTENTS

1. Purpose
2. Legal Authorities
3. Civil Rights Contact
4. Equal Opportunity Policy and Procedure
5. Complaint Resolution Procedure
6. Complaint Notification Form
7. Disability Compliance
8. Limited English Proficiency Plan
9. Annual Civil Rights Training for the Supplemental Nutrition Assistance Program
10. Civil Rights Assurance of Compliance
11. CCRP Administration
12. Appendix
 - Attachment A – Full List of Legal Authorities
 - Attachment B – Complaint Form
 - Attachment C – Disability Brochure; DHS-4133-ENG
 - Attachment D – 2016 Civil Rights Assurance of Compliance
 - Attachment E – Anoka County Human Services Equal Opportunity Policies and Procedures including Equal Access for People with Disabilities
 - Attachment F - Complaint Notification Form to DHS
 - Attachment G - Anoka County Human Services Limited English Proficiency (LEP) Plan

1. Purpose

As a recipient of federal financial assistance, Anoka County Human 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. Anoka County Human Services has a CCRP 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. This CCRP also serves as a source of information for county agency staff and the general public. It sets out Anoka County Human Services' 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.

2. Legal Authorities (See full list in Appendix, Attachment A)

- Title VI of the Civil Rights Act of 1964 (race, color, national origin)
- Section 504 of the Rehabilitation Act of 1973 (disability)
- Section 508 of the Rehabilitation Act of 1973 (disability)
- Title II of the Americans with Disabilities Act of 1990; State and local government services (disability)
- Age Discrimination Act of 1975 (age)
- Section 1557 of the Patient Protection and Affordable Care Act (added sex discrimination in health care programs)
- Title IX of the Education Amendments of 1972 (sex)
- Bilingual Requirements in the Food Stamp Program, Food and Nutrition Service, U.S. Department of Agriculture
- FNS Instruction 113-1, Civil Rights Compliance and Enforcement – Nutrition Programs and Activities, Food and Nutrition Service, U.S. Department of Agriculture (2005)
- Minnesota Human Rights Act, Chapter 363A

3. Civil Rights Contact

Anoka County designates Cindy Cesare, Division Manager, Anoka County Human Services, to serve as the agency's Civil Rights Contact, agency point person on civil rights matters.

Cindy Cesare, Division Manager
Anoka County Human Services
Voice: 763-324-1400
Or use your preferred relay service
Cindy.Cesare@co.anoka.mn.us

4. Equal Opportunity Policy and Procedure

Anoka County Human Services Equal Opportunity Policy and Procedure

It is the policy of Anoka County Human 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.

Anoka 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 Anoka County Human Services' 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 Anoka County Human Services. The Minnesota Human Rights Act also applies to the work of Anoka County Human Services and those agencies carrying out its programs.

Program Accessibility for People with Disabilities

Anoka County Human Services 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, Anoka County will:

- Notify the public about rights and protections for people with disabilities under the Americans with Disabilities Act
- Designate an ADA Contact 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 Anoka County buildings
- Level access into the first floor of all Anoka County buildings with elevator access to all other floors

Reasonable Modifications to Policies, Procedures or Practices

Anoka County will make reasonable modifications to its policies, procedures or practices when necessary to avoid discrimination on the basis of disability, unless Anoka 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

Anoka County Human 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, Anoka County Human Services 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, Anoka County Human Services will give primary consideration to the requests of people with disabilities. Anoka County Human Services 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, Anoka County Human Services will find another equally effective auxiliary aid or service.

5. Complaint Resolution Procedure

Anoka County Human Services Civil Rights Complaint Procedure

Every individual has the right to equal access to services, whether they are an applicant, client or member of the public trying to gain access to human services program information or benefits. Anoka County Human Services has a civil rights complaint procedure that provides prompt and thorough resolution of civil rights complaints.

Civil rights complaints allege discrimination. Individuals have a right to file a civil rights complaint if they believe they or an individual they care for has been discriminated against because of their race, color, national origin, sex, sexual orientation, age, creed, religion, political beliefs, disability or public assistance status. Sex includes sex stereotypes and gender identity discrimination that occurs in medical or health programs and clinics receiving federal financial assistance, such as Medical Assistance, MNCare, Children's Health Insurance Program (CHIP) programs, insurance companies and state health insurance exchanges.

It is against the law for anyone who works for Anoka County to retaliate against a person who files a complaint or who cooperates in the investigation of a civil rights complaint.

Everyone has a right to file a civil rights complaint, even if the complaint does not appear to involve discrimination. If the complainant believes that the complainant has been discriminated against by someone providing human services, then a civil rights complaint packet will be provided. Each packet must include the Agency's equal opportunity policy, complaint resolution procedure and complaint form. To file a complaint, ask for Anoka County Human Services' equal opportunity policy, complaint procedure and complaint form. Use the contact information below to file your complaint. You can also review the law and regulations that outlaw discrimination in the Civil Rights Contact's office at Anoka County Human Services:

Cindy Cesare, Division Manager
Anoka County Human Services
Anoka County Government Center
2100 Third Avenue
Anoka, MN 55303
Voice: 763-324-1400
FAX: 763-324-1110
Or use your preferred relay service
Cindy.Cesare@co.anoka.mn.us

Complaint Procedure:

- A. Civil rights complaints **must** be submitted to the Civil Rights Contact within 180 days of the date the alleged discrimination occurred.
- B. A complaint **must** be in writing and contain the name and address of the person filing it. Attachment B in the Appendix may be utilized. Complainant should also provide a telephone number or relay service number if deaf or hard of hearing. Provide an email address if it helps get in touch with the complainant. The complaint **must** state the problem or action alleged and the relief desired. If you need assistance with your complaint, the Civil Rights Contact will help you.
- C. Anoka County Human Services **must** conduct an investigation of the complaint. The investigation may be informal, but it **must** be thorough and timely. People who have an interest in the complaint **must** have an opportunity to submit relevant evidence about the complaint. The investigation shall include interviews with individuals involved in the complaint and review of all relevant documents. Anoka County Human Services will issue a written decision on the complaint within 120 days after its filing and shall notify the complainant of its decision. Anoka County Human Services will maintain the complaint records and files for three years from the date of the decision. Complaints about program rules are not civil rights complaints and will be resolved through a different complaint process.
- a. **County agencies are not permitted to investigate civil rights complaints in the Supplemental Nutrition Assistance Program (SNAP) because counties directly administer SNAP benefits. County agencies must refer SNAP civil rights complaints to DHS or the USDA regional office in Chicago. The USDA regional address is:**
- Civil Rights Director Midwest Regional Office
USDA/Food and Nutrition Service 77 W. Jackson Blvd., 20th Floor
Chicago, IL 60604-3591
(312) 353-6657 (voice) or use your preferred relay service**
- D. The person filing the complaint may appeal the Agency's decision by writing to the agency's Civil Rights Contact within 15 days of receiving the written decision. The Civil Rights Contact **will** issue a written decision in response to the appeal, no later than 30 days after the filing. This decision is final. – This appeal process is not the same as filing a fair hearings appeal with the Department of Human Services' Appeals and Regulations Division.

- E. The person filing the complaint will be informed that he/she can file a discrimination complaint **directly** with the U.S. Department of Health and Human Services' Office for Civil Rights or the U.S. Department of Agriculture (USDA) for the SNAP Program.

- (a) 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, sex and religion. Sex includes sex stereotypes and gender identity discrimination that occurs in medical or health programs and clinics receiving federal financial assistance, such as Medicaid, CHIP programs and insurance companies and state health insurance exchanges 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 N. Michigan Avenue
Suite 240
Chicago, IL 60601
312-886-2359 (voice)
800-368-1019 (toll free)
800-537-7697 (TTY)

- (b) USDA requires that the following nondiscrimination statement be provided **exactly** as it is shown below:

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 required 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.

F. Filing Complaints with State Agencies:

The person filing the complaint **must** also be informed that he/she can file a discrimination complaint **directly** with the Minnesota Department of Human Rights and the Minnesota Department of Human Services.

- (a) 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)

- (b) The **Minnesota Department of Human Services** 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 discrimination that occurs in health programs or activities receiving federal financial assistance, such as Medical Assistance, MNCare, CHIP programs and insurance companies and state health insurance exchanges. Contact the Equal Opportunity and Access Division **directly** only if you have a discrimination complaint:

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

- (c) County agencies are not permitted to investigate civil rights complaints in the Supplemental Nutrition Assistance Program (SNAP) because counties directly administer SNAP benefits. County agencies **must** refer SNAP civil rights complaints to DHS or the USDA regional office in Chicago. The USDA regional address is:

Civil Rights Director
Midwest Regional Office
USDA/Food and Nutrition Service
77 W. Jackson Blvd., 20th Floor
Chicago, IL 60604-3591
(312) 353-6657 (voice) or use your preferred relay service
Tamara.earley@fns.usda.gov

G. Arrangements for People with Disabilities:

Anoka County Human Services **will** make appropriate arrangements to ensure that people with disabilities are provided reasonable modifications or effective communications, if needed, to participate in the complaint process. Reasonable modifications or effective communications include, but are not limited to, providing interpreters for people who are deaf or hard-of-hearing; providing taped cassettes and accessible formats for people who are blind or have low vision; and assuring a physically accessible location for complaint proceedings. The Civil Rights Contact or designee is responsible for making these arrangements.

Anoka County Human Services will refer all SNAP civil rights complaints to DHS or the USDA regional office in Chicago as soon as possible after received.

6. Complaint Notification Form

Anoka County Human Services will use the *Complaint Notification Form*, Attachment F, to notify DHS in writing of all service delivery discrimination complaints filed against Anoka County Human Services and resolved on the county agency level. Anoka County Human Services will make sure the complaint notification form is completed and sent to DHS within 90 days of the date the complaint was filed in the county so DHS can report the complaint to the appropriate federal office. A copy of the *Complaint Notification Form* is located in the Appendix; Attachment F.

7. Disability Compliance

A. Disability Law and Standard of Access for State and Local Government Services

Section 504 of the Rehabilitation Act of 1973 protects qualified individuals with disabilities from discrimination based on their disability in federally funded programs and services.

Title II of the Americans with Disabilities Act of 1990 (Title II of the ADA) protects qualified individuals with disabilities from discrimination on the basis of their disability when the discrimination occurs in state or local government services. An agency does not have to receive federal financial assistance to be required to comply with Title II of the ADA. An agency just has to be a state or local government entity.

Anoka County must ensure that people with disabilities are able to use their programs and services. Disability laws set out an equal access standard for providing services. This means that individuals with disabilities are entitled to equal access to human services programs; the same standard of access that applies to people without disabilities.

A public agency must reasonably modify its policies, procedures and practices to avoid discrimination. A public agency must also take appropriate steps to ensure that its communications with individuals with disabilities are as effective as communications with others.

B. ADA Contact

Anoka County has designated an ADA Contact person to serve as its point person on disability matters raised by applicants, clients and members of the public. ADA Contact information is located on the cover page of this CCRP.

Mike Roff, Employee Relations
Anoka County Government Center
2100 Third Avenue
Anoka, MN 55303
Voice: 763-324-4308
Or use your preferred relay service
Mike.Roff@co.anoka.mn.us

a. Disability Complaints

People filing disability complaints will use Anoka County Human Services' civil rights complaint procedure.

b. ADA Notice Document

Anoka County Human Services will use the DHS brochure: *Do you have a disability?* (DHS-4133-ENG) as its ADA notice document. This notice document informs applicants, clients and members of the public that Anoka County does not discriminate on the basis of disability. The notice document also gives information to the public about the rights of people with disabilities under the Americans with Disabilities Act.

Anoka County Human Services has a copy of DHS brochure: *Do you have a disability* (DHS-4133-ENG) posted in the lobbies next to the reception desks.

A copy of the DHS brochure: *Do you have a disability* (DHS-4133-ENG) is located in the Appendix; Attachment C.

c. Disability Policy Prohibiting Discrimination

The Anoka County Human Services' Equal Opportunity Policy and Procedure includes provisions which prohibit disability discrimination in human services programs. This policy is located in the agency's lobbies and is located in the Appendix; Attachment E.

8. Limited English Proficiency Plan

Anoka County Human Services Limited English Proficiency (LEP) Plan is attached to this Plan as Attachment G.

9. Annual Civil Rights Training for the Supplemental Nutrition Assistance Program (SNAP)

Anoka County Human Services will conduct annual SNAP civil rights training for all staff who administer the SNAP program and all staff who have direct contact with the public, such as support staff, supervisors and managers. Anoka County Human Services will use DHS' PowerPoint presentation to train staff, document the date of the training each year and document who attends the training.

10. Civil Rights Assurance of Compliance

The Anoka County Human Services Division Manager and county attorney representative have signed the *2016 Civil Rights Assurance of Compliance*. A copy is located in the Appendix; **Attachment D**.

11. CCRP Administration

Anoka County Human Services will:

- Post a copy of its CCRP in the agency's lobbies where members of the public can review it and in the employee copy rooms and have it available on line on the Anoka County Human Services Intranet where staff can review it
- Post the CCRP on the agency's public website
- Review the CCRP annually with ALL staff
- For the benefit of applicants, clients and members of the public, prominently post in each lobby a copy of the *equal opportunity policy and procedure* that includes provisions prohibiting disability discrimination and a copy of its civil rights complaint procedure
- Post a copy of the DHS brochure: *Do you have a disability?* (DHS-4133-ENG) in each lobby next to the reception desk
- Conduct annual SNAP civil rights training for all staff who administer the SNAP program and all staff who have direct contact with the public, including support staff, supervisors and managers. Anoka County Human Services will document the date of the training each year and document who attends the training.

12. Appendix

Attachment A – Full List of 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 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
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 Regulation

State

Minnesota Human Rights Act, Chapter 363A

Attachment B – Complaint Form

Anoka County Civil Rights Complaint Form: Discrimination in Service Delivery

Client Information:

Name: _____
Address: _____
Telephone number(s): _____
Name, Address and Telephone number of someone who will know how to reach you (optional)

Agency Information

Agency: _____
Person in Agency (if known): _____
Agency Address: _____
Agency Telephone: _____

Information about Discrimination Complaint (check as many as apply):

Race Color National Origin Sex Creed Religion
 Age Disability Public Assistance Status Sexual Orientation Political Beliefs
If you filed this complaint with any other agency, please give the name, address and telephone number of the agency and the name of the investigator assigned to the case: _____

Details of Discrimination Claim:

Explain what happened to you and please include the following points:
1) Explain why you believe you were treated differently; 2) Explain how you were treated differently from other people;
3) Give the date(s) of the incident(s) 4) Give the name(s) of the people who were directly involved; 5) If there were any witnesses, give their names(s) and explain what they saw or heard.

If you need more space, attach additional pages:

Signature _____ Date _____

This information is available in accessible formats for individuals with disabilities by calling 763-324-1400 or by using your preferred relay service. For other information on disability rights and protections, contact the agency's ADA Coordinator.

Equal Opportunity and Access
Contact: Civil Rights Coordinator
763-324-1400 (voice)
763-324-1110 (fax)
Use preferred relay service

For translation of this document in Hmong, Russian, Somali, Spanish or Vietnamese, contact the Civil Rights Coordinator.

Attachment C – DHS Brochure: *Do you have a disability*; DHS-4133-ENG



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, 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.

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.

USDA is an equal opportunity provider and employer.

CB 4 (1-15)

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 ។ បើអ្នកត្រូវការជំនួយក្នុងការយល់ព័ន្ធនៃឯកសារនេះដោយឥតគិតថ្លៃ 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. ຖ້າຫາກ 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.

1111-0000-1111

ADAS (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.

Attachment D

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

Anoka County Human Services Division, (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 of 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.

Date July 20, 2016

_____/s/_____
Cindy Cesare, Division Manager
Anoka County Human Services

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.

Date July 20, 2016

_____/s/_____
Nancy Norman Sommer
Assistant Anoka County Attorney

Attachment E

ANOKA COUNTY HUMAN SERVICES' EQUAL OPPORTUNITY POLICIES AND PROCEDURES INCLUDING EQUAL ACCESS FOR PEOPLE WITH DISABILITIES Equal Opportunity Policy

It is the policy of Anoka County Human Services (Anoka County) 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.

Anoka 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 Anoka 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 Anoka County. The Minnesota Human Rights Act also applies to the work of Anoka County and those agencies carrying out the work of Anoka County.

Program Accessibility Policy for People with Disabilities

Anoka 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, Anoka 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 Anoka County buildings.

Level access into the first floor of all Anoka County buildings with elevator access to all other floors.

Reasonable Modifications to Policies, Procedures or Practices

Anoka County will make reasonable modifications to its policies, procedures or practices when necessary to avoid discrimination on the basis of disability, unless Anoka 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

Anoka 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, Anoka 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, Anoka County will give primary consideration to the requests of people with disabilities. Anoka 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, Anoka County will find another equally effective auxiliary aid or service.

Attachment F

**County Human Service Agency Complaint Notification Form of Complaints
Alleging Discrimination in Service Delivery**

REQUIREMENT: Anoka County Human Services must complete this form to notify the DHS Civil Rights Coordinator within 120 days of all service delivery discrimination complaints (i.e., civil rights complaints) filed against them.

1. Complainant Name: _____
2. Complainant Address: _____
3. Complainant telephone numbers: _____
4. Complainant e-mail: _____

5. Name and address of county agency delivering the benefits, including names of any employees accused of wrongdoing: _____

6. Type of discrimination alleged: _____

7. Description of the alleged discrimination, including dates of occurrence and names and contact information for any witnesses: _____

8. Summary of the investigative findings, including any corrective action ordered: _____

Include with this report 1) the complaint provided by the Complainant, 2) the investigative decision provided to the complainant and 3) any appeal of that decision by the complainant.

Send completed packet to:

DHS Civil Rights Coordinator
Minnesota Department of Human Services
Equal Opportunity and Access Division
PO Box 64997
St. Paul, MN 55164-0097
651-431-3034 (voice) or preferred relay service
651-431-7444 (fax)
Joann.daSilva@state.mn.us

Anoka County Human Services Limited English Proficiency (LEP) Plan

Table of Contents

100 - Purpose And Legal Basis

200 - Assessment

201 - Needs Assessment

202 - Case Finding

203 - Points of Contact

204 - Resources Needed

205 - Timely Access

300 - Policies and Procedures

301 - Agency Commitment

302 - Range of Oral Language Assistance

303 - Uncommon Languages

304 - Affirmative Action

305 - Use of Family and Friends

306 - Competency Standards for Interpreters

307 - Dissemination of LEP Plan

308 - Services To Illiterate

309 - Emergency Situations

310 - Access To and Cost of Interpreters

311 - Notice of Service Availability

312 - County-Produced Materials

313 - Complaint Resolution Protocol

314 - Posting

315 - Contracted Providers

400 - Training

401 - Distribution of Plan

402 - Training of Staff

500 - Monitoring

501 - Evaluation of the LEP

502 - LEP Contact Person

100 - Purpose and Legal Basis

This document serves as the Anoka County Human Services plan to meet the legal obligation of language access requirements in compliance of Title VI of the Civil Rights Act of 1964, 42 U.S.C. §2000 et seq.; 45 CFR §80; 68 FR 47311 (2003); 28 CFR §42.405(d)(1); and 7 CFR, §272.4 et seq. There are four components to this document.

200 - Assessment

300 - Policy

400 - Training

500 – Monitoring

200 – Assessment

201 – Needs Assessment - Anoka County Human Services will on at least an annual basis assess the language needs within the County. An interdepartmental LEP Team comprised of Economic Assistance, Social Services and Behavioral Health, Fiscal, Community Health, Job Training, and Corrections staff will assess the language needs. The LEP Team will review information available from the major school districts, legal assistance, the English as a Second Language provider, the Minnesota Department of Human Services, and other groups to determine the non-English languages that are most predominant in the county and which constitute populations that the county serves or those that may be eligible for county-provided services.

The following non-English languages are more common in Anoka County Human Services Programs: **Spanish, Russian, Arabic, Hmong and Somali**. The LEP Committee regularly reviews usage of Language Line and other interpreter services to evaluate the non-English language interpreters utilized by the various Anoka County Human Services Departments.

202 – Case Finding - Specific language needs of each applicant with LEP will occur at the time of intake, application, or referral for services. If staff suspects that the applicant is a person with LEP, the worker will attempt to determine the language needs of the individual. Cards listing major languages will be used, if necessary to determine which language is involved. Reasonable efforts will be made by Anoka County Human Services to provide same-day interpreter services. LEP needs of clients will be clearly identifiable in their case record. Persons with LEP may also be provided with information regarding English as a Second Language classes. Economic Assistance will have the most contact with the LEP population. EA staff will review the language preference questions on the Health Care Application 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 MAXIS. Social Services, Public Health, Corrections and Job Training Center employees will document language needs in the appropriate system to allow awareness of the need for interpreter services.

203 – Points of Contact - The principal point of contact will most likely be in the office setting at the Blaine Human Services Center or the Anoka County Government Center at the time of intake, an emergency, or application for financial assistance. The most appropriate form of interpreter services will likely be language assistance related to financial assistance or health care. The other points of contact may involve face-to-face contacts for social services, mental health, corrections, or public health intervention which may take place in Anoka County offices, homes or community settings.

204 – Resources Needed - Anoka County Human Services will utilize state and county contracts with interpreter agencies and maintain a list of interpreters for staff use. This list will extend beyond the most common languages in Anoka County, and include additional languages that are available.

Anoka County Human Services will also utilize telephone interpreter services. When feasible, onsite interpreter services will be made available and are the first preference. (Note: interpreter agencies may require advance notice for scheduling.)

205 – Timely Access – Anoka County Human Services will utilize a telephone interpreter service that is available 24 hours a day. 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.

300 Policies and Procedures

301 – Agency Commitment – Anoka County Human Services is committed to the intention 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 by Anoka County Human Services.

Anoka County Human Services has, by prior action, adopted the Comprehensive Civil Rights Plan, effective July, 1995 and revised July, 2016 in conformity with the DHS Bulletins #94-84A dated 12-27-94 and 16-89-01 dated March 25, 2016. The LEP plan supplements the Comprehensive Civil Rights Plan.

302 – Range of Oral Language Assistance – Primary use will be made of the state and county contracts with interpreter agencies, including Language Line Services. Contracted agencies are able to supply on site interpreters for the most common languages and Language Line Services is seen as having interpreter services available in all of the languages Anoka County Human Services expects to encounter. Preference will be given to use of on-site interpreters. Telephone interpreter services, including Language Line Services, will be used when timeliness and necessity do not allow for scheduling of an on-site interpreter. There will also be limited oral language assistance on site in the Anoka and Blaine locations from current agency employees having very cursory proficiency in several non-English languages. Anoka County Human Services will take advantage of the “I Speak” posters and cards made available by the Minnesota Department of Human Services.

303 – Uncommon Languages – When contact is made by persons who use a language other than languages most commonly encountered in Anoka County or major languages designated by the Minnesota Department of Human Services, reception staff will refer all such cases to their department's intake or screening specialist. This person 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 telephone interpreter in the customary manner.

304- Affirmative Action - At no time in the service delivery process will the client incur any costs associated with LEP-directed interpreter services. Clients will be informed verbally that there is no charge for this service if an interpreter is needed.

305 – Use of Family and Friends – Staff should accommodate clients' wishes to have family or friends serve as interpreters whenever possible. However, staff must consider client confidentiality and interpreter competency. Protection of confidentiality and accuracy of interpretation should always be the highest concern; always offer free interpreter services, and if a client prefers to have a family member or friend interpret, request that the client permit a trained interpreter to listen into ensure accuracy of interpretation. The worker shall document in the case file the circumstances for use of family or friends. Anoka County will only pay for interpreter services for those interpreters under contract with Anoka County when Anoka County has requested their services. Except in an emergency or for incidental contact, no individual under the age of 18 may be used for interpreter services. See Section 309.

306 – Competency Standards for Interpreters – Any interpreter used for LEP services must be proficient in both English and the target language, 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. Anoka County interpreter contracts will require that interpreters be properly trained, competent and qualified to interpret, and abide by the code of ethics. When using family, friends or significant others, the worker must make a judgment as to the competency of the proposed interpreter.

307 – Dissemination of the LEP Plan – Copies of the LEP Plan will be posted on the Anoka County Intranet and made available to: Anoka County Human Services employees, Anoka County Division Managers, Fiscal, County Sheriff, County Attorney, County Administrator and the Judicare office. A copy of the main public announcement, MS – 1659 Language Poster, will be prominently displayed in Anoka County Human Services central reception areas. Anoka County will display DHS 4739 Notice.

308 – Services To Illiterate – When a customer is illiterate – cannot read or write in his or her native language – Anoka County Human Services will use reasonable efforts to find a suitable interpreter who can assist the person in completion of necessary forms, documents and necessary communications. The Anoka County Human Services intake worker will make the determination in conjunction with the interpreter about the customers' literacy skills. An on-site interpreter will be used. Interviews will be scheduled when face to face interpreter services can

be provided. Faxing of forms or over-the-phone services may be required on a case-by-case basis.

309 – Emergency and Incidental Communications – When an emergency exists or communication is incidental in nature and LEP considerations are present, Anoka County Human Services may waive its LEP Plan policies if necessary to ensure that necessary emergency services are provided. A supervisor must be informed prior to or immediately after taking such actions.

310 – Access to and Costs of Interpreters - Under no circumstances will Anoka County Human Services indicate - either verbally or in writing - that any applicant or client in need of LEP services will be charged for interpreter services. All such services shall be at no expense to the applicant or client. Such services will be provided during 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 interpreter and translation services when it appears that the customer is not able to communicate in English. Notice of service availability will come from the MS-1659 document posted in the Anoka County Human Services reception areas. Anoka County will use available DHS translated materials when it has been determined that the person presenting for services is unable to understand English.

312 – County Produced Materials – Anoka County Human Services will rely on the state produced documents as the primary source of translated materials. Anoka County Human Services will follow the Minnesota Department of Human Services translation numerical guidelines as required. Translation will be used on a case by case basis as necessary to convey vital information.

313 – Complaint Resolution Protocol - Any adverse action taken by Anoka County Human Services with which an applicant or recipient disagrees is subject to complaint. Anoka County Human Services 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 make a complaint to DHS or the Office of Civil Rights. The complaint procedure will conform in all respects to the Anoka County Human Services procedure included in Comprehensive Civil Rights Plan Requirements. Interpreter services will be used to facilitate the dispute resolution process. All such complaints can be made to any of the parties listed at the end of this LEP Plan.

314 – Posting – Clients will be notified of the availability of the LEP Plan and the Comprehensive Civil Rights Plan by a posting on the main bulletin boards in each of the Anoka County Human Services Reception Areas.

315 – Contracted Providers - Service providers who are reimbursed with federal funds pursuant to a contract with Anoka County Human Services are subject to LEP requirements.

Contract Attachment C has been developed and updated by the Anoka County Attorney's Office and will be incorporated into new contracts and existing contracts at time of renewal.

400 - Training

401 – Distribution of the LEP Plan – An electronic version of the LEP Plan will be maintained on the Anoka County Human Services Administrative Website. All Anoka County Human Services employees will be provided access to the LEP Plan upon its adoption which will be available on the Anoka County Intranet. This includes staff of Economic Assistance, Social Services and Behavioral Health, Fiscal, Community Health, Job Training, Corrections, and Human Services Administration. If any changes are made in the document, notice will be provided to the same entities listed in Section 307 above.

402 – Training of Staff – Annual training is provided to all Human Services Staff. This training will be provided in the context of staff meetings or on line webinars within each Anoka County Human Services Department. Each new employee will receive training sessions in computer based trainings that will be incorporated into the employee’s orientation at the time of hire.

500 – Monitoring

501 – Evaluation of the LEP – At least annually, the LEP Plan will be reviewed for effectiveness. The evaluation will involve the interdepartmental LEP Team 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 Anoka County.
- Assessment of current language needs of Anoka County Human Services applicants and clients to determine if the clients need 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.
- Determining whether existing assistance is meeting the needs of applicants and clients with LEP.
- Assessing whether staff members understand Anoka County Human Services 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 Anoka County including applicants and clients as well as any known community organization or advocacy group working with non-English or limited- English speaking communities.
-

502 – LEP Contact Person – For purposes of the LEP Plan, Anoka County’s designated contact person is the department director with appropriate delegation made to supervisors within their respective departments.