



Clay County Social Services Comprehensive Civil Rights Plan (CCRP)

Clay County Social Services
715 11th Street North, Suite 502
Moorhead, MN 56560
Phone: (218) 299-5200
MN Relay Service: 711 or (800) 627-3529
Fax: 218-299-7515

Civil Rights Coordinator: 218-299-7134 (voice)
ADA Coordinator: 218-299-7134 (voice)
Limited English Proficiency Coordinator: 218-299-7134 (voice)

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 and for information about equal access to services, call 218-299-5200 (voice) or MN Relay Service: 711 or (800) 627-3529

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Purpose

As a recipient of federal financial assistance, Clay County Social Services is responsible for providing core services to assist and support Minnesota's most vulnerable individuals and families, so they can meet their basic needs and be treated with respect and dignity. Clay County Social 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 Clay County Social Service's civil rights administrative policies and procedures, identifying key contacts within the agency and linking the reader to applicable state and federal civil rights laws and resources.

1. 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

2. Civil Rights Contact

Clay County Social Services designates Rhonda Porter, Director of Social Services, to serve as the agency's Civil Rights Contact, agency point person on civil rights matters.

Rhonda Porter
218-299-7134
MN Relay Service: 711 or (800) 627-3529
Rhonda.porter@co.clay.mn.us

3. Equal Opportunity Policy and Procedure

Clay County Social Services Equal Opportunity Policy and Procedure

It is the policy of Clay County Social 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.

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

Program Accessibility for People with Disabilities

Clay County Social Services and all 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, Clay County Social Services 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 Clay County Social Services building
- Level access into the first floor of the Clay County Social Services building with elevator access to all other floors

Reasonable Modifications to Policies, Procedures or Practices

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

Effective Communication and Auxiliary Aids and Services

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

5. Complaint Resolution Protocol**Clay County Social Services Civil Rights Complaint Protocol**

You have the right to equal access to services, if you are an applicant, client or member of the public trying to gain access to human services program information or benefits. Clay County Social Services has a civil rights complaint protocol that provides prompt and thorough resolution of civil rights complaints.

Civil rights complaints allege discrimination. You have a right to file a civil rights complaint if you believe you have been discriminated against because of your 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, CHIP programs, insurance companies and state health insurance exchanges.

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

To file a complaint, ask for Clay County Social Services equal opportunity policy, and complaint protocol. Use the contact information below to help you to file your complaint. You can also review the law and regulations that outlaw discrimination in the Civil Rights Contact's office at Clay County Social Services:

Rhonda Porter, Director
Clay County Social Services
715 11th Street North, Suite 502
Moorhead, MN. 56560
Phone: 218-299-7134
MN Relay Service: 711 or (800) 627-3529
Fax: 218-299-7515

Procedure:

1. Civil rights complaints **must** be submitted to the Civil Rights Contact within 180 days of the date the alleged discrimination occurred.
2. A complaint **must** be in writing and contain the name and address of the person filing it. You should also give your telephone number or relay service number if you are deaf or hard of hearing. Give your email address if it helps get in touch with you. 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.
3. Clay County Social 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. Clay County Social Services will issue a written decision on the complaint within 90 days after its filing. Clay County Social Services will maintain the complaint records and files for three years. Complaints about program rules are not civil rights complaints and will be resolved through a different complaint process.
4. The person filing the complaint may appeal the 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.

5. The person filing the complaint must 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) 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, audiotope, 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 USDS office, or write a letter addressed to USDA and provide in the letter all 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.

6. 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

7. Arrangements for People with Disabilities:

Clay County Social Services **will** make appropriate arrangements to ensure that people with disabilities are provided accommodations to participate in the complaint process in an equal manner to people without disabilities. Appropriate arrangements 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.

8. Clay County Social 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 Protocol

Clay County Social Services will follow the Civil Rights *Complaint Protocol and will* notify DHS in writing of all service delivery discrimination complaints filed against Clay County Social Services and resolved on the county agency level. Clay County Social Services will make sure the complaint 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 Clay County Civil Rights Complaint Protocol is in the Appendix; **Attachment B** and the Clay County Complaint Notification form to DHS Civil Rights Coordinator is in the Appendix; **Attachment C**.

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.

County human service agencies 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

Clay County Social Services 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.

Rhonda Porter, Director
218-299-7134
MN Relay Service: 711 or (800) 627-3529
Rhonda.porter@co.clay.mn.us

c. Disability Complaints

People filing disability complaints will use Clay County Social Services Civil Rights Complaint Protocol.

d. ADA Notice Document

Clay County Social 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 Clay County Social Services 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.

Clay County Social Services has a copy of DHS brochure: *Do you have a disability* (DHS-4133-ENG) posted in the lobby next to the reception desk.

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

e. Disability Policy Prohibiting Discrimination

The Clay County Social Services Equal Opportunity Policy and Procedure includes provisions which prohibit disability discrimination in human services programs. This policy is in the agency lobby.

8. Limited English Proficiency Plan

Clay County Social Services has a Limited English Proficiency Plan to assure meaningful access to services. A copy is in the Appendix; **Attachment G**.

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

Clay County Social 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.

Clay County Social 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 Clay County Social Services Director has signed the *2016 Civil Rights Assurance of Compliance*. A copy is in the Appendix; **Attachment E**.

11. CCRP Administration

Clay County Social Services will:

- Post a copy of its CCRP in the agency lobby where members of the public can review it and in the employee break room 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 the 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-4133ENG) in the 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. Clay County Social Services will document the date of the training each year and document who attends the training.

12. Appendix

- a. Attachment A: Full List of Legal Authorities**
- b. Attachment B: Clay County Social Services Civil Rights Complaint Protocol**
- c. Attachment C: Complaint Notification Form**
- d. Attachment D: Disability Brochure; DHS-4133-ENG**
- e. Attachment E: Assurance of Compliance Between DHS and Clay County Social Services**
- f. Attachment F: Assurance of Compliance Between Clay County Social Services and Rural Minnesota CEP, Inc.**
- g. Attachment G: Clay County Limited English Proficiency**

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



**CLAY COUNTY SOCIAL SERVICES
CIVIL RIGHTS COMPLAINT PROTOCOL**

You have the right to equal access to services, if you are an applicant, client or member of the public trying to gain access to human services program information or benefits. Clay County Social Services has a civil rights complaint protocol that provides prompt and thorough resolution of civil rights complaints.

Civil rights complaints allege discrimination. You have a right to file a civil rights complaint if you believe you have been discriminated against because of your 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, CHIP programs, insurance companies and state health insurance exchanges.

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

To file a complaint, ask for Clay County Social Services equal opportunity policy, and complaint protocol. Use the contact information below to help you to file your complaint. You can also review the law and regulations that outlaw discrimination in the Civil Rights Contact's office at Clay County Social Services:

Rhonda Porter, Director
Clay County Social Services
715 11th Street North, Suite 502
Moorhead, MN. 56560
Phone: 218-299-7134
MN Relay Service: 711 or (800) 627-3529
Fax: 218-299-7515

Procedure:

1. Civil rights complaints **must** be submitted to the Civil Rights Contact within 180 days of the date the alleged discrimination occurred.
2. A complaint **must** be in writing and contain the name and address of the person filing it. You should also give your telephone number or relay service number if you are deaf or hard of hearing. Give your email address if it helps get in touch with you.

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.

3. Clay County Social 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. Clay County Social Services will issue a written decision on the complaint within 90 days after its filing. Clay County Social Services will maintain the complaint records and files for three years. Complaints about program rules are not civil rights complaints and will be resolved through a different complaint process.
4. The person filing the complaint may appeal the 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.
5. The person filing the complaint must 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) 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 USDS office, or write a letter addressed to USDA and provide in the letter all 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:

mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;

fax: (202) 690-7442; or

email: program.intake@usda.gov

This institution is an equal opportunity provider.

6. 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

7. Arrangements for People with Disabilities:

Clay County Social Services **will** make appropriate arrangements to ensure that people with disabilities are provided accommodations to participate in the complaint process in an equal manner to people without disabilities. Appropriate arrangements 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.

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

CLAY COUNTY SOCIAL SERVICES COMPLAINT NOTIFICATION FORM
COMPLAINTS ALLEGING DISCRIMINATION IN
SERVICE DELIVERY

AUTHORITY: U.S. Department of Agriculture, Food and Nutrition Service Instruction 113-1.

REQUIREMENT: County human service agencies must notify the DHS Civil Rights Coordinator within 90 days of all service delivery discrimination complaints (i.e., civil rights complaints) filed against them (see bottom of Page 2 for contact information).

ACTION REQUIRED:

Complete this form and send it to the DHS Civil Rights Coordinator within 90 days of the date the complaint was filed.

1. Name, address, telephone number of complainant:

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

5. Give a summary of the investigation findings, including any corrective action ordered:

CONTACT INFORMATION:

DHS Civil Rights Coordinator
Minnesota Department of Human Services
Equal Opportunity and Access Division
P.O. Box 64997
St. Paul, MN 55164-0997
651-431-3034 (voice) or use your preferred relay service
651-431-7444 (fax)

joann.dasilva@state.mn.us

Do you have a disability?

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

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

What medical conditions may be disabilities?

A disability is a physical, sensory, or mental impairment that materially limits a major life activity. Types of disabilities may include:

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

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

What help is available?

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

- Calling you or meeting with you in another place if you are not able to come into the office
- Using a sign language interpreter

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

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

How does the law protect people with disabilities?

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

Discrimination is against the law

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

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

Minnesota Department of Human Services

Equal Opportunity and Access Division

P.O. Box 64997

St. Paul, MN 55164-0997 651-431-3040 (voice) or use your preferred relay service

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

Freeman Building, 625 North Robert Street

St. Paul, MN 55155

651-539-1100 (voice)

800-657-3704 (toll free)
711 or 800-627-3529 (MN Relay)

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



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

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

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

If you wish to file a Civil Rights program complaint of discrimination, complete the **USDA Program Discrimination Complaint Form**, found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 6329992 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.

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 1-008-853-7730.

kMNt'sMKal' . ebIG~k''tUvkarCMnYyk~-gkarbkE''bäksarenHeday²tKit«fÅ sUmsYrG~kkan'sMNUmerOg rbs'G~k ÉehATUrs&Bímklex 1-888-468-3787 .

Pažnja. Ako vam treba besplatna pomoć za tumačenje ovog dokumenta, pitajte vašeg radnika ili nazovite 1888-234-3785.

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

ໂປຣດຊາບ. ຖ້າຫາກ ທ່ານຕ້ອງການການຊ່ວຍເຫຼືອ ໃນການແປເອກະສານພາສາ, ຈົ່ງຖາມພະນັກງານກັບການຊ່ວຍເຫຼືອ ຂອງທ່ານ ທີ່ ໂທຣໄປທີ່ 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.

ADA5 (12-12)

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

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

County Agency: Clay County Social Services

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

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

THE COUNTY AGENCY AGREES THAT IT WILL COMPLY WITH:

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

discrimination in all FNS nutrition programs and activities, whether federally funded in whole or not. FNS Instruction 113-1 incorporates the above Federal legal authorities.

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

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

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

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

10-31-16 _____ Date



Rhonda Porter, Social Services Director
Name and Title of Authorized Official (please print)

Signature of Authorized Official

Clay County Social Services
Name of County Agency

715 11th St. N. Suite 502, Moorhead, MN 56560
Street Address, City, State, Zip Code

Please deliver Assurance to:
Civil Rights Coordinator
Minnesota Department of Human Services, Equal Opportunity and Access Division
P.O. Box 64997, St. Paul, MN 55164-0997
joann.dasilva@state.mn.us

MINNESOTA DEPARTMENT OF HUMAN SERVICES
CIVIL RIGHTS ASSURANCE OF COMPLIANCE FOR CONTRACTORS/VENDORS
 (Nondiscrimination in State and Federally Financed Programs)

CONTRACTOR/VENDOR: Rural Minnesota CEP, Inc.

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

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

THE CONTRACTOR/VENDOR AGREES THAT IT WILL COMPLY WITH:

7. Title VI of the Civil Rights Act of 1964, 42 USC §2000d et seq., as amended, and all requirements imposed by or pursuant to the regulation at 7 CFR Part 15, Subpart A and Subpart C. In accordance with Title VI and the Regulation, no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity for which the Contractor/Vendor receives Federal financial assistance.
8. Section 504 of the Rehabilitation act of 1973, 29 USC § 794, as amended, and all requirements imposed by or pursuant to the regulation at 7 CFR Part 15b. In accordance with Section 504 of that Act and the Regulation, no otherwise qualified individual with a disability in the United States shall, solely by reason of her/his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity for which the Contractor/Vendor receives Federal financial assistance.
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THE CONTRACTOR/VENDOR AGREES THAT BY ACCEPTING THIS ASSURANCE, it will compile data, maintain records, and submit reports, as required, to permit effective enforcement of the nondiscrimination laws and permit authorized USDA personnel and other authorized personnel, such as DHS and county agency personnel, during normal working hours to review such records, books, and accounts as needed to ascertain compliance with the nondiscrimination laws. If there are any violations of this assurance, DHS may withhold financial assistance and DHS/USDA shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the Contractor/Vendor and its successors, transferees, and assignees, as long as they receive Federal financial assistance or retain possession of any assistance from DHS/USDA.

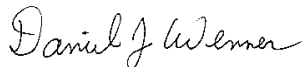
The person whose signature appears below is authorized to sign this assurance and commit the Contractor/Vendor to the above provisions.

11/2/2016

Date

Daniel J. Wenner Executive Director

Name and Title of Authorized Contractor/Vendor (please print)



Signature of Authorized Contractor/Vendor

801 Roosevelt Ave., Detroit Lakes, MN. 56501

Street Address, City, State, Zip Code

Wilkin County -Host County Region 4 SNAP Service Agreement including the counties of:

Becker, Clay, Douglas, Grant, Otter Tail, Pope, Stevens, Traverse and Wilkin

Name of Contractor's/Vendor's County Human Service Agency

Contractor/Vendor: Please deliver this Assurance of Compliance to your county human service agency.



**CLAY COUNTY SOCIAL SERVICES
Limited English Proficiency (LEP) Plan**

Contact Person:

**Rhonda Porter, Director
715 11th St. No. Suite 502
Moorhead, MN 56560
(218) 299-7134**

Original-May 2001
Reviewed January 2003
Reviewed June 2004
Updated March 2005
Reviewed November 2005
Reviewed May 2006; DHS Approved
Reviewed May 2007; DHS Approved
Reviewed May 2008; DHS Approved
Reviewed 2010-2011; DHS Approved
Reviewed and LEP Plan updated March 15, 2013
Reviewed and LEP Plan updated July 27, 2016

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Attachment A- Clay County Social Services Civil Rights Complaint Resolution Procedure

I Purpose and Legal Basis

The legal basis for this written policy and the obligations to provide meaningful access to persons with limited English proficiency are contained in the following references:

- Title VI of the Civil Rights Act of 1964.
- Office of Civil Rights Administrative Citation: 65 Fed. Reg. 52762 (2000)
- Department of Justice Regulation, Regulatory Citation: 28 CFR part 42.405 (d) (1)
- DHS Bulletin #00-89-4 issued December 2000 and
- DHS Bulletin #03-89-01 issued November 2003

II Assessment

A. Language Needs:

Languages Encountered in Clay County Community per Minnesota Department of Education-Primary Home Language Counts by County for 2011-2012, listed in order of prevalence:

1. Spanish
2. Arabic
3. Vietnamese
4. Somali
5. Chinese
6. Russian
7. Cambodian

LEP Language and Interpreter Data (Department of Human Services Clay County Specific Data for 17 HealthCare, Cash and Food Programs- 2011

Case Applicant Spoken Language – Total Count 5,785

1. English- 5,480 (94.7%)
2. Missing- 43 (0.8%)
3. Non-English- 262 (4.5%)
 - a. Arabic-76 (76.3% needing interpreter)
 - b. Spanish- 44 (52.3% needing interpreter)
 - c. Serbo-Croat- 29 (93.1% needing interpreter)
 - d. Somali- 21 (81% needing interpreter)
 - e. Vietnamese- 14 (78.6% needing interpreter)
 - f. Hmong- 2- (50% needing interpreter)
 - g. Russian- 1 (100% needing interpreter)
 - h. ASL- 1
 - i. Unknown- 23
 - j. Other 51 (64.7% needing interpreter)

Languages enumerated by Clay County staff and Interpreter Usage for 2012:

1. Arabic
2. Kurdish
3. Bosnian
4. Spanish
5. Somali
6. Farsi
7. Albanian

B. Points of contact in agency where language assistance is likely to be needed:

1. Income Maintenance Unit- Public Assistance Programs: Interpreter services would be most effective utilizing community resources and Language Line as strategies.
2. Child Support, Fraud and Collections Unit: Interpreter services would be most effective utilizing community resources and Language Line as strategies.
3. Social Service Units: Interpreter services would be most effective utilizing community resources and Language Line as strategies.
4. Reception/Intake in all units: Posters, I Speak Cards, interpreter services would all be resources.

C. Resources Utilized/Required for Effective Language Assistance:

1. Interpreter Services
 - a. International Translation Service
5675 45th Street South
Moorhead MN 56560
 - b. Language Line Services
One Lower Ragsdale Drive
Monterey CA 93940
 - c. Bilingual (Spanish) employees of our agency.
 - d. I Speak Cards and Posters
 - e. Minnesota Multilingual Referral Line
2. Other Resources/Strategies to be utilized:
 - a. Identification and recording the specific language needs for each LEP client in their file.
 - i. Use appropriate panels in MAXIS, PRISM and SSIS.

- ii. Ask client what his/her primary language is.
 - iii. Ask client about their need for an interpreter.
 - b. Use of translated forms when indicated, appropriate and available.
 - c. Use of the “I Speak” cards, posters and other visuals.
- 3. Timely Access Arrangements
 - a. Accessing community resources or internal organizational resources will occur within 24 hours of identified need.
 - b. If appropriate resources cannot be accessed within 24 hours the Language Line will be utilized to ensure timeliness.
 - c. Services will be available during all hour’s agency operational.

III. Policy on Language Access

A. Statement of Commitment:

Clay County Social Service Center is committed to providing meaningful access to its services for all persons, including persons with limited English language proficiency.

B. Specific Polices/Procedures/Strategies

- 1. Range of Options Available Include:
 - a. Bilingual Staff - We have several staff who speak Spanish (one specifically designated to provide interpreter services).
 - b. Arrangements with community providers who provide interpreter services.
 - c. Formal agreement with Language Line services.
- 2. Although we have access to several different languages through Community Interpreter Services, it is anticipated Language Line will be utilized to meet language needs of persons whose languages are uncommon to our area.
- 3. Notification Strategies:

- a. Posting of signs in waiting areas informing persons of their right to free interpreter services and inviting them to identify any language assistance needs.
 - b. Use of “I Speak” cards by intake workers and other personnel at point of initial contact.
 - c. Intake workers and others will note the language of the LEP person in their file so that anyone picking up file can readily identify language assistance needs.
 - d. Insertion of notices relative to free interpreters and other language assistance in brochures, pamphlets and other materials disseminated to the public and to staff.
 - e. Notice to the public through the media of the availability of LEP Services (newspaper articles, television coverage, etc.)
5. Use of Friends and Family as Interpreters:
- a. Minor children shall not be used as interpreters.
 - b. If, after informed of right to free interpreter, the client declines such service and requests a friend or family member serve as interpreter, then it can be allowed. (This should be documented in case file.)
6. Competency of Interpreters:
- a. Clay County will ensure that interpreters, whether bilingual staff or professional interpreters, have been trained and demonstrate competency.
 - b. The establishment of standards and liability issues will be the subject of discussion with local providers of interpreter services.
7. Language Services to Persons Who Do Not Read Their Own Language:
- a. Clay County Social Services staff will assist a client with LEP who does not read his/her primary language to the same extent as staff would assist an English speaker who does not read English.

8. Language Services in Emergency Situations:
 - a. Clay County Social Services will take whatever steps necessary to ensure all clients including clients with LEP have access to services within appropriate time frames.
 - b. Use of competent interpreters available for emergencies will be first course of action, however, considering that same day services may be required we anticipate Language Line will be used frequently in emergency situations.
9. Translation of County-Produced Written Materials:
 - a. Clay County will follow DHS translation numerical guidelines as required.
 - b. Staff will identify materials/documents that would need to be translated as well as translation resources (DHS would be primary resource).
10. Complaint Resolution Procedure:
 - a. Clay County will follow the Complaint Resolution Procedure that is currently in place and on file with the Minnesota Department of Human Services (see Attachment A of this policy.)
 - b. A log of all LEP complaints will be kept for tracking and documentation. Larry Young will oversee keeping log.
 - c. Rhonda Porter, Director, telephone number 218-299-5200 will be responsible for receiving Civil Rights complaints for the agency including complaints relative to LEP.

IV Staff Training

1. The LEP Plan will be made a part of new employee orientations.
2. The LEP Plan will be distributed to all agency staff likely to have contact with persons with LEP.
3. Intake Workers in all units
4. Supervisors will each have a copy.
5. Staff awareness will happen through discussions in unit supervisor staffing's and through distribution of notices and other written materials.

6. Training on specific aspects of the plan will occur:
7. How to use Language Line
8. How to use Interpreters
9. How to handle emergency/crisis situations
10. Periodic training should occur from DHS and other entities to ensure uniformity, information sharing and a best practices philosophy.

V. Monitoring

1. The LEP Plan will be reviewed by the agency management team on an annual basis.
2. Evaluation will include the following components:
 - a. Assessment of numbers of persons with LEP (DHS will assist in this process).
 - b. Assessments of current language needs of applicants and clients (updating of files and reviewing at redeterminations of eligibility).
 - c. Assessment of existing resources as to effectiveness.
 - d. Monitoring by agency Supervisory staff as to whether staff is complying with LEP Plan.