

Douglas County Social Services Comprehensive Civil Rights Plan (CCRP)

Douglas County Social Services 809 Elm Street, Suite 1186 Alexandria, MN 56308-1772 320-762-2302 844-204-0012

MN Relay Service: 711 or (800) 627-3529 dcss@co.douglas.mn.us

Civil Rights Coordinator: Heather Schlangan, 320-762-3858 (voice)
ADA Coordinator: Heather Schlangan, 320-762-3858 (voice)
Limited English Proficiency Coordinator: Laurie Bonds, 320-762-3815 (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 320.762.2302 or 844.204.0012.

TTY users place calls through MN Relay Service: 711 or (800) 627-3529

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1. Purpose

As a recipient of federal financial assistance, Douglas 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. Douglas 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 Douglas County Social 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

Douglas County Social Services designates Heather Schlangen, County Coordinator to serve as the agency's Civil Rights Contact, agency point person on civil rights matters.

Heather Schlangen, County Coordinator 320-762-3848

MN Relay Service: 711 or (800) 627-3529

heathers@co.douglas.mn.us

4. Equal Opportunity Policy and Procedure Douglas County Social Services Equal Opportunity Policy and Procedure

It is the policy of Douglas 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.

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

Program Accessibility for People with Disabilities

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

Reasonable Modifications to Policies, Procedures or Practices

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

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

5. Complaint Resolution Procedure

Douglas County Social Services Civil Rights Complaint Procedure

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

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

Douglas County Social Services 809 Elm Street, Suite 1186 Alexandria, MN 56308 320-762-2302 or 1-844-204-0012 MN Relay Service: 711 or (800) 627-3529

e-mail: dcss@co.douglas.mn.us

Or contact:

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

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

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

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, disability, religion and sex (including sex stereotypes and gender identity under any health program or activity receiving federal financial assistance). Contact the agency directly at:

U.S. Department of Health and Human Services Office for Civil Rights, Region V 233 North Michigan Avenue Suite 240 Chicago, IL 60601 312-886-2359 (Voice) 800-368-1019 (Toll Free) 800-537-7697 (TTY) In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), 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.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf, from any USDA office, by calling (833) 620-1071, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to:

mail: Food and Nutrition Service, USDA

1320 Braddock Place, Room 334

Alexandria, VA 22314; or

fax: (833) 256-1665 or (202) 690-7442; or

email: FNSCIVILRIGHTSCOMPLAINTS@usda.gov

This institution is an equal opportunity provider.

6. Complaint Notification Form

Douglas County Social Services will use the *Complaint Notification Form* to notify DHS in writing of all service delivery discrimination complaints filed against Douglas County Social Services and resolved on the county agency level. Douglas County Social 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 B.

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 services 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

Douglas 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.

Heather Schlangen, County Coordinator Douglas County 320-762-3858

MN Relay Service: 711 or (800) 627-3529) e-mail: heathers@co.douglas.mn.us

c. Disability Complaints

People filing disability complaints will use Douglas County Social Services' civil rights complaint procedure.

d. ADA Notice Document

Douglas 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 Douglas 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.

Douglas 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 located in the Appendix; Attachment C.

e. Disability Policy Prohibiting Discrimination

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

8. Limited English Proficiency Plan

DOUGLAS COUNTY SOCIAL SERVICES

809 Elm Street, Suite 1186 Alexandria. MN 56308-1772 Laurie Bonds, Director

320-762-2302 Fax: 320-762-3833 TDD: 320-762-8151

LIMITED ENGLISH PROFICIENCY (LEP) PLAN Reviewed: 1-11-2022

Table of Contents

LEP Coordinator:Laurie Bonds, Director320-762-3815Financial Services:Brenda Lunak, Supervisor320-762-2947Social Services:Laurie Bonds, Director320-762-3815

PURPOSE AND LEGAL BASIS

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

Assessment Policy Training Monitoring

<u>ASSESSMENT</u>

1. Needs Assessment:

DCSS will on at least an annual basis make a needs assessment of the unique language needs within Douglas County. Consultation will be made with the major school districts in the County. Additionally, consultation will be made with the Legal Aid Office located in Alexandria. Consultations will aim at trying to discern the types of non-English languages that are most predominant in Douglas County and which constitute populations that the County serves or those that may be eligible for County-provided services. The County will also be amenable to receive County-specific data from the Department of Human Services to assist in this form of needs assessment. The following non-English language has been identified as being the most likely to be encountered in Douglas County: Spanish.

2. Case Finding:

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

The second area will be the non-financial intake. The intake worker will identify LEP concerns during the intake process and make note in the comment section of SSIS.

3. Points of Contact:

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

4. Resources Needed:

DCSS will formally entertain a formal linkage with Language Line Services (1-800-752-0093) for Spanish and other languages involved with Language Lines Services "tier system." When feasible, on-site interpreter services will be made available and would be the first preferences. The Agency has interactive television (ITV) capabilities. When appropriate, the use of ITV will be considered. Use of reciprocal faxing processes will be used when necessary. This is to facilitate completion of applications and processing of interviews.

5. Timely Access:

Language Line Services are available 24x7. Contact with LLS will be made by commercial phone. When on-site interpreter services are to be used, it will be necessary to schedule appointments at mutually convenient times - for the client and the interpreter. Use of ITV, if

used, will occur in a private setting within the Agency. The Supervisor will make arrangements for interpreter services with appropriate service provider. Staff will never require, suggest, or encourage a client with LEP to use family members or friends as interpreters.

POLICIES AND PROCEDURES

1. Agency Commitment:

DCSS is committed to the spirit of the Civil Rights Act of 1964. It recognizes the importance of providing meaningful access to all persons, including persons with LEP, to the various programs operated under the hubris of DCSS.

2. Range of Oral Language Assistance:

There will be limited oral language assistance on site in the DCSS agency from current agency employees. Employees have very cursory proficiency in several non-English languages. Use of Language Line Services for Spanish and all other non-English language will take place as necessary. DCSS will take advantage of the ten brief "notice of rights to language services" documents for persons with LEP as they are made available by the Department of Human Services.

3. Uncommon Languages:

There may be circumstances when customers present for services who use a language other than that most commonly used in Douglas County. There may be languages such as Russian, Hmong, Vietnamese, Kymer/Cambodian, Lao, Somali, and the like. Receptionist staff will refer all such cases to the Financial Services Supervisor, Social Services Supervisor, or Director. 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 Language Line Services interpreter in the customary manner.

4. Affirmative Action:

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

5. Use of Family and Friends:

Use of family or friends as interpreters is not the preferred method of providing interpreter services; but when the intake worker has determined that it is not feasible to use formalized interpreter services, a consultation will be made with that worker's immediate Supervisor or Director. Alternative methods of customer services will need to be discussed. If the worker has determined that a family member, friend, or other responsible party can adequately perform the interpreter service, approval may be given. The worker needs to feel confident that the client's data privacy rights will be protected and that the quality of the interpreter services to be provided by the family member or friend will be acceptable. The worker will need to document in the case file the extenuating circumstances for use of family or friends, particularly that the family was offered other interpreter services and that the client insisted that a family member or friend be used. Under no circumstances may minor children be used for interpreter services.

6. Competency Standards for Interpreters:

Any interpreter used for LEP services must be bi-lingual: fluent in English and fluent in the language of the customer needing the service. When using well-recognized interpreter services provided from a recognized agency (Language Line Services), competency is presumed. Interpreters must be "competent" to provide interpreter services. Competency contemplates that the "interpreter must be proficient in both English and the target language and be able to convey information in both languages accurately, have had orientation/training that includes the skills and ethics of interpreting, have basic knowledge in both languages of specialized program terms or concepts, and be sensitive to the client's culture. "Certification" as an interpreter is not a pre-requisite. When using family, friends, or significant others, the intake worker must make a judgment as to the competency of the proposed interpreter. Whenever practical, clients with LEP will be assigned to bilingual staff who speak their language.

7. Dissemination of LEP Plan:

Copies of the LEP Plan will be provided to the following: all DCSS employees who have direct customer contact, area Legal Aid Office, Douglas County Public Health, and Douglas County Courthouse. A copy of the main public announcement will be prominently displayed in the DCSS central reception area.

8. Services to Illiterate:

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

9. Emergency Situations:

When a determination has been made that an emergency exists and LEP considerations are identified as being present, DCSS may waive all proscriptions in order to insure that necessary emergency services are provided. Extraordinary efforts need to be put forth before circumvention of non-emergency procedures are followed. Consultation with a Supervisor or the Director is necessary before such action is taken. When programs require access to services within short time frames, DCSS will take whatever steps necessary to ensure that all clients, including clients with LEP, have access to services within the appropriate time frames. For example, when a client needs an interpreter or other language assistance services to obtain expedited program services, DCSS goal is to make the services accessible within the required time frame, whether that means using an interpreter or any other appropriate type of language assistance.

10. Access To and Costs of Interpreters:

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

11. Notice of Service Availability:

LEP clientele will be informed of the availability of free interpreter and translation services at the point when it appears that the customer is not able to communicate in English. Notice of service availability will come from the document in the central reception area. Distribution of the LEP Plan to various parties cited above will help in putting those entities on notice that interpreter and translation services are available on a timely basis and free of charge. Use of material that has been translated into Spanish will be used immediately when it has been determined that the person presenting for service is not able to understand English. Insofar a the Department of Human Services has translated many forms into multiple languages, DCSS will

access these forms as necessary. Access to the Department's website at www.dhs.state.mn.us/forms will be made. Additionally, translated income maintenance forms located in TEMP Manual 12.01.13 will be accessed as needed.

12. County-Produced Materials:

Insofar as the LEP census in Douglas County is small, it is not anticipated that DCSS will develop any DCSS-produced material. Rather, DCSS will rely on the state-produced documents as the primary source of translated materials. Downloading of documents from the DHS web page will also be used as necessary. DCSS will follow DHS's translation numerical guidelines as required.

13. Complaint Resolution Protocol:

Any adverse action taken by DCSS with which an applicant or recipient disagrees is subject to complaint. DCSS 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 and make a complaint to DHS or the Office of Civil Rights. Appropriate use of interpreter services with Language Line Services to facilitate the dispute resolution process will take place. All such complaints can be made to any of the parties listed at the top of this LEP Plan.

14. Posting:

A copy of the DCSS LEP Plan will be posted on the main bulletin board in the central lobby.

TRAINING

1. Distribution of LEP Plan:

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

At this time, the following employees will be recipients of the document:

All Financial Services Staff	23
All Social Services Staff	36
All Child Support Staff	9
All Accounting Staff	10
The Fiscal Supervisor	1
The Director	1
The Assistant Director	1
Office Support Staff	6

2. Training of Staff - Initial:

With approval of the LEP Plan, there will be initial training on the document. This training will take place for current staff in the context of an "All Staff" meeting. For any new employee affected by the LEP Plan, this document will be incorporated into that person's generic orientation protocol at the time of hire.

3. Training of Staff - Ongoing:

On at least an annual basis at an "All DCSS Staff" meeting, a review of the LEP Plan will take place.

MONITORING

1. Evaluation of the LEP Plan:

On at least an annual basis, the LEP Plan will be reviewed for effectiveness. This review will normally take place in January and will be coordinated by the DCSS LEP Coordinator. The evaluation will involve consultation with representatives of the Financial Services Unit and Social Services Unit to determine compliance with the LEP Plan, identification of any problem areas, and development of required corrective action strategies. Elements of the evaluation will include the following:

- * Number of persons with LEP in Douglas County
- * Assessment of current language needs of DCSS 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 at the time of certification.

- * Assessment whether staff members understand DCSS LEP policies and procedures and who 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 Douglas County including applicants and clients as well as any known community organization or advocacy group working with non-English or limited-English speaking communities.

2. LEP Contact Person:

For purposes of the LEP Plan, Douglas County's designated contact person is the Director with appropriate delegation made to both the Financial Assistance Supervisor and the Social Services Supervisor of the agency.

9. Annual Civil Rights Training for the Supplemental Nutrition Assistance Program (SNAP) Douglas 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. Douglas 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 Douglas County Social Services' director 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

Douglas 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-4133-ENG) in the lobby next to the reception desk

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 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. Douglas 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 Complaint Notification Form
- c. Attachment C DHS Brochure: Do you have a disability; DHS-4133-ENG
- d. Attachment D Signed Copy of the 2016 Civil Rights Assurance of Compliance
- e. Attachment E Signed Copy of the 2019-2021 State-County Civil Rights
 Assurance Agreement

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

DOUGLAS 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 and telephone number of complainant:	
2. Name and address of county agency delivering the benefits, including names of any employees accused of wrongdoing:	
3. Type of discrimination alleged:	

4. Describe the alleged discrimination, including the dates it happened. Give names and contaction of any witnesses:		
5. Give a summary of the in	nvestigation findings, including any corrective action ordered:	
CONTACT INFORMATION:	DHS Civil Rights Coordinator Minnesota Department of Human Services Equal Opportunity and Access Division PO Box 64997 St. Paul, MN 55164-0997 651-431-3034 (Voice) or use your preferred relay service 651-431-7444 (Fax) e-mail: 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.

Civil Rights Notice

Discrimination is against the law. The Minnesota Department of Human Services (DHS) does not discriminate on the basis of any of the following:

■ race■ color

■ creed

■ religion

■ national origin

■ sexual orientation

■ public assistance status

■ marital status

■ sex

■ disability

= sex

political beliefs

Civil Rights Complaints

■ age

You have the right to file a discrimination complaint if you believe you were treated in a discriminatory way by a human services agency.

Contact **DHS** directly only if you have a discrimination complaint:

Civil Rights Coordinator Minnesota Department of Human Services Equal Opportunity and Access Division P.O. Box 64997 St. Paul, MN 55164-0997

651-431-3040 (voice) or use your preferred relay service

Minnesota Department of Human Rights (MDHR)

- In Minnesota, you have the right to file a complaint with the MDHR if you believe you have been discriminated against because of any of the following:
 - race
 - color
 - national origin

 - religion
- creed

- sex
- sexual orientation
- marital status
- public assistance status
- disability

Contact the **MDHR** directly to file a complaint:

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) 651-296-9042 (fax) Info.MDHR@state.mn.us (email)

U.S. Department of Health and Human Services' Office for Civil Rights (OCR)

You have the right to file a complaint with the OCR, a federal agency, if you believe you have been discriminated against because of any of the following:

■ race

■ disability

- color
- sex
- national origin
- religion

■ age

Contact the **OCR** directly to file a complaint:

Director, U.S. Department of Health and Human Services' Office for Civil Rights

200 Independence Avenue SW, Room 509F

HHH Building

Washington, DC 20201

800-368-1019 (voice) 800-537-7697 (TDD)

Complaint Portal: https://ocrportal.hhs.gov/ocr/portal/lobby.jsf

In accordance with Federal civil rights law and

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

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

To file a program complaint of discrimination, complete the <u>USDA Program Discrimination Complaint Form</u>, (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:

- 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.

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

ያስተውሉ፡ ይህንን ዶኩመንት ለመተርጎም እርዳታ የሚፈልጉ ከሆነ፡ የጉዳዮን ሰራተኛ ይጠይቁ ወይም በሰልክ ቁጥር 1-844-217-3547 ይደውሉ።

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

သတိ။ ဤစာရွက်စာတမ်းအားအခမဲ့ဘာသာပြန်ပေးခြင်း အကူအညီလိုအပ်ပါက၊ သင့်လူမှုရေးအလုပ်သမား အားမေးမြန်း ခြင်းသို့ မဟုတ် 1-844-217-3563 ကိုခေါ် ဆိုပါ။

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

請注意,如果您需要免費協助傳譯這份文件,請告訴您的工作人員或撥打1-844-217-3564。

Attention. Si vous avez besoin d'une aide gratuite pour interpréter le présent document, demandez à votre agent chargé du traitement de cas ou appelez le 1-844-217-3548.

Thoy 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.

ဟ်သူဉ်ဟ်သးဘဉ်တက္ ေ စနမ္ က်လိဉ်ဘဉ်တာ်မ႑စ႑႑ကလီလ႑တာ်ကကျိုးထံဝဲစဉ်လံ ာ တီလံာမီတခါအာံ နေ့ $\hat{\rho}$, သံကွန်ဘဉ်ပှၤဂ့ဂ်ဝီအပှ႑မ႑စ႑းတာ်လ႑နဂိဂ်မ္တတ မွန်ကိုးဘဉ် 1-844-217-3549 တက္နန

알려드립니다. 이 문서에 대한 이해를 돕기 위해 무료로 제공되는 도움을 받으시려면 담당자에게 문의하시거나 1-844-217-3565으로 연락하십시오.

ໂປຣດຊາບ. ຖ້າຫາກ ທ່ານຕ້ອງການການຊ່ວຍເຫຼືອໃນການແປເອກະສານນີ້ຟຣີ, ຈົ່ງຖາມພະນັກງານກຳກັບການຊ່ວຍເຫຼືອ ຂອງທ່ານ ຫຼື ໂທຣໄປທີ່ 1-888-487-8251.

Hubachiisa. Dokumentiin kun tola akka siif hiikamu gargaarsa hoo feete, hojjettoota kee gaafadhu ykn afaan ati dubbattuuf bilbili 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.



For accessible formats of this information, ask your county worker. For assistance with additional equal access to human services, contact your county's ADA coordinator. ADA4 (2-18)

LB1 (8-16)

agency	

MINNESOTA DEPARTMENT OF HUMAN SERVICES CIVIL RIGHTS ASSURANCE OF COMPLIANCE

NONDISCRIMINATION IN STATE AND FEDERALLY FINANCED PROGRAMS DOUGLAS COUNTY SOCIAL SERVICES (HEREAFTER CALLED THE "COUNTY AGENCY"

THE COUNTY AGENCY provides this civil rights Assurance of Compliance (hereafter called the "Assurance") in consideration of and for the purpose of obtaining any and all federal financial assistance from the United States Department 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 A	APPEARS BELOW is authorized to sign this Assurance and commit the Count
Agency to its terms.	
7/18/16	Down Dowls
Date	Director's Signature
	inty Agency has lawful authority to bind the County Agency to the terms of this
civil rights Assurance.	
1/18/010	
Date	County Attorney's Signature
7/18/28/6 Date	County Attorney's Signature



2019-2021 STATE-COUNTY CIVIL RIGHTS ASSURANCE AGREEMENT

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

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

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

The County Agency agrees to:

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

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

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

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

SIGNATURE of Authorized Representative

Print Name

Douglas County Social Services Name of County Agency 809 Elm Street Ste. 1186 / Alexandria, MN. 56308 Street Address, City, State, Zip Code

ADDENDUM

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

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

Meaningful Access for LEP Individuals

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

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

Federal LEP regulations and guidance include:

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

Four Factor Analysis for Assessing LEP Needs

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

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

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

Developing an LEP Plan

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

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

Ensuring Equal Opportunity Access for Persons with Disabilities

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

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

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

Civil Rights Coordinator
Minnesota Department of Human Services
Equal Opportunity and Access Division
P.O. Box 64997
St. Paul, MN 55164-0997
ioann.dasilva &state.mn.us