

Roseau County Comprehensive Civil Rights Plan

Contact Information

The following is the contact information for Civil Rights, Limited English Proficiency, and ADA/504:

Contact: David Anderson, Director
Address: Roseau County Social Services
208 6th St SW
Roseau, Minnesota 56751
Phone: 218-463-2411
Fax: 218-463-3872
TTY/TDD: 800-627-3529 (Minnesota Relay)
877-627-3848 (Speech to Speech Relay)
Email: dave.anderson@co.roseau.mn.us
Posting: The Comprehensive Civil Rights Plan will be posted in the main lobby at 208 6th St. SW, Roseau, MN 56751. The Plan will also be posted in the employee break room and on the county web site.



For accessible formats of this publication or assistance with additional equal access to human services, write to dhs.equalopportunity@state.mn.us, or call 651-431-3040.

Purpose of Plan

As a recipient of federal financial assistance, Roseau County Social Service Agency 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. Roseau County has a civil rights plan 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. The civil rights plan also serves as a source of information for county agency staff and the general public. The plan sets out the agency'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.

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 Amendment of the Rehabilitation Act of 1973 (disability)
4. Title II of the Americans with Disabilities Act of 1990; State and local government services (disability)
5. Age Discrimination Act of 1975 (age)
6. Community Service Assurance Provisions of the Hill-Burton Act (health facilities receiving Hill-Burton Funds)
7. Section 1557 of the Patient Protection and Affordable Care Act (added sex discrimination in health care programs)
8. Nondiscrimination Provisions of the Omnibus Budget Reconciliation Act of 1981 (Federal Block Grants):
 - Community Services Block Grant (race, color, national origin, sex) Remaining block grants (race, color, national origin, age, disability, sex, religion)
 - Social Services Block Grant
 - Maternal and Child Health Services Block Grant
 - Projects for Assistance in Transition from Homelessness Block Grant
 - Preventive Health and Health Services Block Grant
 - Community Mental Health Services Block Grant
 - Substance Abuse Prevention and Treatment Block Grant
9. Title IX of the Education Amendments of 1972 (sex)
10. Family Violence Prevention and Services Act (race, color, national origin, age, disability, sex, religion)
11. Food Stamp Act of 1977 [As Amended Through P.L. 108-269, 2004]
12. Nondiscrimination Compliance Requirements in the Food Stamp Program, Food and Nutrition Service, U.S. Department of Agriculture
13. Bilingual Requirements in the Food Stamp Program, Food and Nutrition Service, U.S. Department of Agriculture
14. FNS Instruction 113-1, Civil Rights Compliance and Enforcement – Nutrition Programs and Activities, Food and Nutrition Service, U.S. Department of Agriculture (2005)
15. Equal Opportunity for Religious Organizations in USDA Regulation

State

Minnesota Human Rights Act, Chapter 363A

Civil Rights Contact Person

David Anderson, Director will serve as the official contact for the agency's comprehensive civil rights plan. This person may also serve as the Limited English Proficiency (LEP) Plan Contact and the Americans with Disabilities Act (ADA) Contact. See information above for contact information.

Roseau County Social Service Agency's Equal Opportunity Policy

It is the policy of Roseau County Social Service Agency 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.

Roseau County employees, services, programs, benefits and policies will not discriminate against applicants, clients or members of the public because of race, color, national origin, sex, sexual orientation, age, creed, religion, political beliefs, disability or public assistance status. "Sex" includes sex stereotypes and gender identity under any medical or health program receiving federal financial assistance, such as Medical Assistance, CHIP programs, health clinics, insurance companies and state health insurance exchanges.

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

Program Accessibility Policy for People with Disabilities

Roseau County and all of its services, programs and benefits, are accessible to and usable by people with disabilities, including people with hearing loss, low vision and other sensory disabilities.

To avoid disability discrimination, Roseau County will:

- Notify the public about the rights and protections for people with disabilities under the Americans with Disabilities Act.
- Designate a Roseau Coordinator and maintain a complaint procedure.
- Make sure that its buildings are physically accessible for people with disabilities.
- Assist individuals with disabilities to apply and qualify for benefits based on their eligibility.
- Provide appropriate auxiliary aids and services, including accessible formats, to ensure effective communication with people with disabilities.

- Provide services, programs and benefits that are accessible to and usable by qualified people with disabilities.

Physical access includes:

- Convenient off-street parking designated specifically for people with disabilities.
- Curb cuts and ramps between parking areas and the Roseau County building.

Reasonable Modifications to Policies, Procedures or Practices

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

Effective Communication and Auxiliary Aids and Services

Roseau County will take appropriate steps to ensure that communications with people with disabilities and companions with disabilities are as effective as communications with others. To ensure effective communications, Roseau County will provide appropriate auxiliary aids and services, including accessible formats, so that people with disabilities can receive services, programs and benefits and participate in them in the same way as people without disabilities. Auxiliary aids and services include qualified readers, writers and interpreters who convey information effectively, accurately and impartially using any necessary specialized vocabulary.

To determine what types of auxiliary aids or services are necessary, Roseau County will give primary consideration to the requests of people with disabilities. Roseau County will honor the choice of the person requesting the auxiliary aid or service unless it would fundamentally alter the nature of the service, program or benefit or cause an undue administrative or financial burden. If this happens, Roseau County will find another equally effective auxiliary aid or service.

Disability Posting – Roseau County Social Service Center has, as part of its Civil Rights Compliance Plan, incorporated the use of the ADA-related brochure “Do You Have A Disability” (DHS-4133-ENG). This document is posted in the reception area of the agency as well as being part of the appendices. This document is also included in all rights and responsibilities information packets distributed to applicants and customers.

Roseau County Social Service Agency Civil Rights Complaint Resolution Procedure

You have the right to file a discrimination complaint with Roseau 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).

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

Roseau County Social Services

208 6th St. SW

Roseau, MN 56751

Phone: 218-463-2411 Fax: 218-463-3872

TTY/TDD 800-627-3529 (Minnesota Relay) 877-627-3848 (Speech to Speech Relay)

DHS Civil Rights Coordinator

Minnesota Department of Human Services Office of Equal Opportunity

P O Box 64997

St. Paul, MN 55164-0997

651-433-3040 (Voice) or use your preferred relay service 651-431-7444 (Fax)

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

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

Minnesota Department of Human Rights Freeman Building, 625 North Robert Street St. Paul, MN 55155

651-539-1100 (Voice)

800-657-3704 (Toll Free)

711 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:

U.S. Department of Health and Human Services Office for Civil Rights, Region V

233 North Michigan Avenue Suite 240

Chicago, IL 60601

312-886-2359 (Voice)

800-368-1019 (Toll Free)

800-537-7697 (TTY)

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

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

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at:

http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) Mail: U.S. Department of Agriculture

Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW

Washington, D.C. 20250-9410

(2) Fax: (202) 690-7442; or

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

This institution is an equal opportunity provider.

Disability Compliance Section

1. Americans with Disabilities Act Contact

Roseau County Social Services ADA contact ensures that civil rights protections are provided to individuals on the basis of race, color, sex, national origin, age and religion. Our ADA contacts information is found on the cover page of this comprehensive civil rights plan.

2. Disability Policies

Roseau County Social Services guarantees equal opportunity for individuals with disabilities in public accommodations, employment, transportation, state and local government services, and telecommunications. Our equal opportunity policy is outlined on page three of this document.

3. ADA Notice Document

Roseau County Social Services has its ADA Notice posted in the agency lobby. The document is a statement of the agencies commitment to break down barriers and enable society to benefit from the skills, talents and abilities of individuals with disabilities which leads to fuller, more productive lives for all Americans.

4. Complaint Procedure for Handling Disability Complaints

Roseau County Social Services has a complaint procedure for resolving disability and other types of civil rights complaints. Those procedures are outlined in this document.

Limited English Proficiency Plan

A. Purpose and Legal Basis

The purpose of this limited English proficiency plan is to ensure meaningful access to program information and services for persons with limited English language proficiency. The legal basis for this plan comes from Title VI of the Civil Rights Act of 1964. This plan implements the Title VI language access responsibilities of human services providers receiving federal assistance from the U.S. Department of Health and Human Services.

B. Legal Authorities/References

According to the Office for Civil Rights (OCR), in order to avoid discrimination on the basis of national origin against persons with limited English language proficiency, recipients of federal financial assistance from the U.S. Department of Health and Human Services must take adequate steps to ensure that persons with limited English proficiency receive the language assistance necessary to allow them meaningful access to services, free of charge. This limited English proficiency plan for Roseau County Social Services has been completed at OCR's instruction. In OCR's August 30, 2000, policy guidance, issued to interpret the regulations under Title VI, OCR states that a recipient of federal financial assistance can ensure effective communication (which leads to meaningful access) by implementing a limited English proficiency plan that accounts for how the recipient (agency) will provide language assistance services when they are needed by applicants, clients, and members of the public.

1. Title VI of the Civil Rights Act of 1964, 42 U.S.C. '2000 et seq.; 45 CFR '80, Nondiscrimination Under Programs Receiving Federal Financial Assistance Through the U.S. Department of Health and Human Services Effectuation of Title VI of the Civil Rights Act of 1964
2. Office for Civil Rights Policy Guidance, 65 Fed. Reg. 52762 (2000), Department of Health and Human Services, Office for Civil Rights, Policy Guidance on the Prohibition Against National Origin Discrimination As It Affects Persons With Limited English Proficiency (August 30, 2000); OCR Website: www.hhs.gov/ocr/lep/
3. Department of Justice Regulation, 28 CFR '42.405 (d)(1), Department of Justice, Coordination of Enforcement of Non-discrimination in Federally Assisted Programs

C. Written Plan

1. Persons Covered by Policy - Identifying Clients with Limited English Proficiency

Roseau County Social Services limited English proficiency plan has been developed to serve its clients, prospective clients, family members of clients or prospective clients, or other interested members of the public (hereafter called clients) who do not speak English or who speak limited English.

A client has limited English language proficiency (LEP) when he/she is not able to speak, read, write or understand the English language at a level that allows him/her to interact effectively with Roseau County Social Services. Sometimes it is not this easy to identify a person with LEP. Some clients may know enough English to manage basic life skills, but may not speak, read or understand English well enough to understand in a meaningful way some of the more complicated concepts they may encounter within the human services systems (i.e., legal, medical or program language). These clients may also fit the description of a person with LEP.

2. Statement of Commitment to Meaningful Access

No person will be denied access to Roseau County Social Services programs or program information because he/she does not speak English or speaks limited English. Roseau County Social Services will provide for effective communication between clients with LEP and Roseau County Social Service staff by making appropriate language assistance services available when clients need these services. Clients will be provided with meaningful access to programs and services in a timely manner and at no cost to the client.

3. Offering Language Assistance Services

Staff will initiate an offer for language assistance to clients who have difficulty communicating in English, or when a client asks for language assistance. Whenever possible, staff is encouraged to follow the client's preferences. For example, if a client wants a family member or friend to interpret rather than a Roseau County Social Service provided interpreter, staff should allow this if doing so will not violate the client's data privacy rights and the friend/family member can demonstrate that he/she is competent to interpret. Staff must offer free interpretation and/or translation services to persons with LEP in a language they understand, in a way that preserves confidentiality, and in a timely manner. [See rule for using family and friends as interpreters.]

4. Uncommon Languages; In-Person Interpreter Services

When interpreter services are needed in a language not commonly used, the client with LEP will be connected to the Language Line, which is a telephone interpretation service Roseau County Social Services contracts with. [See Language Line service.]

If an interpreter is needed in-person, rather than over the telephone, arrangements will be made to have an interpreter available at a time and place that is convenient for both the interpreter and the client. Arrangements for in-person interpreting should be made by contacting vendors directly. [See Department of Administration's website addresses below.]

5. Emergency Situations

When programs require access to services within short time frames, Roseau County Social Services 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, Roseau County Social Services' 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.

6. Interpretation and Translation Defined

For purposes of this policy, interpretation is defined as a spoken or visual explanation provided to help two or more people who do not speak the same language to communicate with each other. Translation is defined as a written version of a document provided in a different language than the original document.

7. Assisting Clients That Don't Read Their Language

Roseau County Social Service staff must 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. Assigning Clients with LEP to Bilingual Staff

Roseau County Social Services does not have bilingual staff. The number of clients who may require LEP service is very few.

D. Procedure for Using Interpretation

1. Verification of Client's Identity:

Roseau County Social Service staff should continue the existing practice of verifying the identity of the client before releasing case-specific information. Bilingual staff, Language Line staff, or other private companies providing interpretation or translation services through contracts with the State (hereafter contractors), may be used in making verifications.

2. Language Assistance Resources - Order of Preference for Use

As much as possible, staff should use these language assistance services in the order set out below.

a. Telephone Interpreter Services

Staff should use the Language Line Services for interpreter assistance when the language is one not commonly encountered at Roseau County Social Services.

The Language Line telephone number is 1-800-874-9426. The Roseau County Social Services Client ID number is 509070.

Roseau County Social Service staff should familiarize themselves with the Language Line before they actually need to use it. Being familiar with how to use this service will help staff act quickly when clients need interpreter assistance.

b. Contract Interpretation and Translation Services

The state Department of Administration holds contracts with several interpretations and translation services contractors in the metro area. Roseau County Social Service divisions can contract on an individual basis to set up short/long term arrangements with these (and other) contractors. Roseau County Social Service staff can access these contractor lists electronically at the Department of Administration's website. By making these lists available to staff, Roseau County Social Services does not endorse them, nor does it claim that they are exhaustive lists of providers for these services. For an extensive listing of additional interpretation and translation vendors, see the Yellow Pages under Translators and Interpreters.

Spoken Interpretation Services:

www.mmd.admin.state.mn.us/mn05022.htm

Written Language Translation Services:

www.mmd.admin.state.mn.us/mn05014.htm

c. Using Family and/or Friends as Interpreters

Staff is asked to accommodate clients' wishes to have family or friends serve as interpreters whenever possible. However, staff must keep in mind both client confidentiality and interpreter competency and should also follow the rules set out below.

Roseau County Social Services may expose itself to liability under Title VI if it requires, suggests, or encourages a client with LEP to use friends, minor children, or family members as interpreters because family, friends, or minor children may not be competent to serve as interpreters.

Use of family or friends could result in a breach of confidentiality or reluctance on the part of clients to reveal personal information critical to

their situations. Family and friends may not be competent to act as interpreters because they may not be proficient enough in both languages, may lack training in interpretation, and/or have little familiarity with specialized program terminology.

If a client still prefers a family member or friend to interpret after Roseau County Social Services offers free interpreter services, Roseau County Social Services may use the family member or friend if doing so will not compromise the effectiveness of the interpretation and/or violate the client's confidentiality. Roseau County Social Service staff should document in the client's case file their offer of interpreter assistance and the fact that the client declined the offer. Even if a client elects to use a family member or friend as an interpreter, Roseau County Social Service staff should suggest that a trained interpreter listen in on the interview to ensure accurate interpretation.

The Language Line or contracted interpreters should be used in circumstances when a client is giving information that may negatively impact his/her eligibility for services - e.g., deadlines or certifications. Language Line interpreters should also be preferred in situations where a client must answer complicated or detailed questions about his/her case. These interpretations may also be handled by family or friends, but should also be referred to Language Line staff, or contractors for follow-up calls or letters. Roseau County Social Service staff must consider the requirements of the Minnesota Data Practices Act when determining whether or not, or in what capacity, a family member or friend may be used to interpret.

d. Rule for Minor Children

Roseau County Social Service staff should never use minor children as interpreters.

3. Minnesota Data Practices Act

Minnesota Data Practices Act requires Minnesota government agencies to maintain the privacy of data that they collect in the course of their business. In the case of Roseau County Social Services, the information that it collects regarding its clients is considered private data. Except in emergencies, this data may not be released to anyone other than the client, Roseau County Social Service employees, the agents of Roseau County Social Services, or others authorized by the courts or federal law, without the client's written, informed consent.

For purposes of the Data Practices Act, organizations and persons who contract to provide translation and interpretation services to Roseau County Social Service clients are considered agents of Roseau County Social Services. They may be privy to Roseau County Social Service clients' private data and are bound by the same requirements for confidentiality as are Roseau County Social Service employees.

4. Competency of Interpreters

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

E. Notice of Rights to Language Assistance

Roseau County Social Service staff must inform all clients with LEP of the public's right to free interpreter services that these services must be provided in a timely manner and must be available during Roseau County Social Service business hours. Staff must also hand out flyers stating the same to all clients with LEP.

Roseau County Social Services will use I Speak cards to help clients with LEP be able to identify their language needs for staff. Roseau County Social Services will also use I Speak posters in the agency to help staff inform clients that language interpreters are available at no cost to the client.

F. Procedure for Using/Distributing Translated Forms

Roseau County Social Services will use the documents and forms which are available in languages other than English that are provided by DHS.

Roseau County Social Service staff with access to MAXIS can retrieve another list of translated documents/forms found in POLI/TEMP manual at TE12.01.13. Staff who does not have access to MAXIS can obtain this list by calling the LEP plan contact person listed below.

Additionally, the Health Care Application Form, the Renewal Form, and the Household Report Form have been translated into Spanish, Russian, Somali, Hmong, Cambodian, Lao, Vietnamese, and Arabic. The English and translated versions are all available on the DHS website at www.dhs.state.mn.us/Forms.

At the appropriate times, Roseau County Social Service staff must send clients the preferred translated forms automatically when the same forms are sent to clients automatically in English.

G. Translation Plan

Due to our small LEP census, Roseau County Social Service will not develop any Roseau County Social Service-produced material. We will rely on the state-produced documents. Downloading of documents from the DHS web-page will also be used as necessary.

H. LEP Training for Roseau County Social Service Staff

Roseau County Social Services will distribute the LEP plan to all staff so they can learn the policies and procedures required to make language assistance available to clients with LEP. All staff with ongoing client contact will be provided a review of LEP procedures

at a staff meeting on an annual basis. In addition, information about the LEP plan will be incorporated into the Roseau County Social Service New Employee Orientation.

LEP training and review will include information on the following topics: Roseau County Social Service's legal obligation to provide language assistance to clients with LEP; the substance of Roseau County Social Service's LEP plan including its policies and procedures to access language assistance services; tips on working with interpreters; and how to properly document information about a client's language needs in the client's case file.

I. Monitoring of the LEP Plan

Roseau County Social Services will conduct an annual evaluation of its LEP plan to determine its overall effectiveness. The evaluation will consider what is working and what is not and make adjustments to the LEP plan accordingly. Roseau County Social Service's LEP Manager will lead the annual evaluation activities with the help of staff persons familiar with the LEP plan and how it functions.

Roseau County Social Services' annual evaluation of its LEP plan will include the following activities:

- Assessment of the numbers of persons with LEP in the service delivery area.

- Assessment of the current language needs of clients with LEP to determine whether clients need an interpreter and/or translated materials to communicate effectively with staff; updating files which lack information about a client's language needs; and confirming information with clients about their language preference at recertification.

- Determining if existing language assistance services are meeting the needs of clients with LEP.

- Assessing whether staff members understand Roseau County Social Service's LEP policies and procedures, how to carry them out and whether language assistance resources and arrangements for those resources are still current and accessible.

- Seeking and getting feedback from LEP communities, including clients and community organizations and advocacy groups working with LEP communities, about the effectiveness of Roseau County Social Service's LEP plan.

J. LEP Plan Posted for Public Review

The LEP plan will be posted for public review in the Roseau County Social Service lobby on the wall to the right of the Information Desk.

K. Distribution of LEP Plan

Immediately upon its completion, the Roseau County Social Service LEP plan will be distributed to all Roseau County Social Service staff.

L. Responsible Authority/Complaint Process - Contact Person

Each Roseau County Social Service division and special office is responsible for implementing this LEP plan in its area. The person designated to provide technical assistance and respond to inquiries and complaints from the public is listed below. Roseau County Social Services has an existing complaint resolution procedure used to resolve civil rights related disputes and complaints and this procedure will be used to resolve LEP-related disputes/complaints. The contact person listed below will provide information about this complaint procedure to all clients in a language they understand.

Jodee Haugen
Financial Assistance Supervisor
Roseau County Social Services
208 Sixth Street SW
Roseau MN 56751
(218)463-2411
(218)463-3872 (FAX)

Assurance of Compliance

In keeping with implementation of Title VI, Section 504 of the Rehabilitation Act, the Age Discrimination Act, and the Food Stamp Act, each county human service agency should sign a written assurance agreement stating that it will comply with these laws. An assurance agreement has been signed by the Director of Roseau County Social Service Center and the Roseau County Attorney and submitted to the Department of Human Services Civil Rights Coordinator. Please refer to Appendix 2 for a copy of this current assurance document.

Annual SNAP Civil Rights Training

Roseau County Social Services will provide annual SNAP civil rights training for agency staff and document that the training has been provided.

Civil Rights Plan Administration

- a. Roseau County Social Services will post the comprehensive civil rights plan in two locations, where it is available to applicants, clients and members of the public and where it is available to employees, volunteers and contractors. The civil rights plan will be posted in the agency lobby and employee break room.
- b. The comprehensive civil rights plan will be included on your agency's website.
- c. The comprehensive civil rights plan will be reviewed annually with ALL staff.
- d. For the benefit of applicants, clients, and members of the public, Roseau County Social Services will prominently post in the lobby a copy of the following documents:
 - (1) Equal opportunity policy;
 - (2) Complaint resolution procedure; and
 - (3) Disability policies and procedures (which may be combined with the equal opportunity policy).

- e. Roseau County Social Services will post DHS' ADA Brochure: *Do you have a disability* (DHS- 4133-ENG), in our agency lobby where members of the public can see and read it. This document provides required disability rights information for the public and its posting serves as a mandated requirement to give notice to the public about the ADA's requirements. Additionally, this document should be included in all *rights and responsibilities* information packets. State in the civil rights plan where the ADA Notice Document (or DHS ADA Brochure) will be posted in the agency.
- f. Roseau County Social Services will conduct annual SNAP civil rights training and document the date of the training and who attended. Create a spot in your comprehensive civil rights plan to document this requirement.

**MINNESOTA DEPARTMENT OF HUMAN SERVICES
2016 CIVIL RIGHTS ASSURANCE AGREEMENT**

ASSURANCE OF COMPLIANCE FOR THE MINNESOTA COUNTY HUMAN SERVICES AGENCIES WITH TITLE VI OF THE CIVIL RIGHTS ACT OF 1964. SECTION 504 OF THE REHABILITATION ACT OF 1993. THE AGE DISCRIMINATION ACT OF 1975 AND THE FOOD STAMP ACT OF 1977.

Roseau County Social Service Center provides this assurance in consideration of and for the purpose of maintaining its receipt of federal financial assistance from the United States Departments of Health and Human Services and Agriculture. Roseau County Social Service Center agrees that compliance with this assurance constitutes a condition of continued receipt of federal financial assistance and that it is binding upon Roseau County Social Service Center, its successors, transferees and assignees for a period of two years, January 2006 through December 2007, during which the assistance is provided.

ROSEAU COUNTY SOCIAL SERVICE CENTER AGREES THAT IT WILL COMPLY WITH:

1. ***Title VI of the Civil Rights Act of 1964 (Pub. L. 88-352)***, as amended, and all requirements imposed by or pursuant to the regulation of the Department of Health and Human Services (45 C.F.R. Part 80). In accordance with Title VI and its implementing 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 otherwise be subjected to discrimination under any program or activity for which Roseau County Social Service Center receives federal financial assistance from the Department of Health and Human Services.
2. ***Section 504 of the Rehabilitation Act of 1973 (Pub. L. 93-112)***, as amended, and all requirements imposed by or pursuant to the regulation of the Department of Health and Human Services (45 C.F.R. Part 84). In accordance with Section 504 and the regulation, no otherwise qualified individual with a disability in the United States shall, solely by reason of his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity for which Roseau County Social Service Center receives federal financial assistance from the Department of Health and Human Services.

The Age Discrimination Act of 1975 (Pub. L. 94-195), as amended, and all requirements imposed by or pursuant to the regulation of the Department of Health and Human Services (45 C.F.R. 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 Roseau County Social Service Center receives federal financial assistance from the Department of Health and Human Services.

3. ***The Food Stamp Act of 1977 (Pub. L. 95-113)***, as amended, and all requirements imposed by or pursuant to the Food and Nutrition Service (FNS) Instruction 113-1, Civil Rights Compliance and Enforcement – Nutrition Programs and Activities of the Department of Agriculture which derives authority from the Food Stamp Act, the Department of Agriculture regulation implementing Title VI (7 C.F.R. Part 15 Subpart A and Subpart C) and the regulations implementing Section 504 and the Age Discrimination Act. In accordance with the Food Stamp Act and FNS Instruction 113-1, the Food Support Program is committed to assuring that no person in the United States shall, on the ground of race, color, national origin, age, sex, disability, political beliefs or religion, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the Food Support Program. FNS Instruction 113-1 requires that Roseau County Social Service Center obtain a written civil rights assurance of compliance, and to assure compliance, Department of Agriculture personnel must be allowed access to Roseau County Social Service Center records, books and accounts as needed during normal work hours.

4. Pursuant to the Civil Rights Plan for the Minnesota Department of Human Services (DHS), DHS shall have access to private and/or confidential data maintained by Roseau County Social Service Center or other sub-recipient of federal financial assistance to the extent necessary to conduct a full and complete investigation into any complaint of discrimination. DHS agrees to comply with all requirements of the Minnesota Government Data Practices Act (Minn. Stat. Ch. 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 thereafter.

The person whose signature appears below is authorized to sign this assurance agreement and commit Roseau County Social Service Center to the above provisions.

Roseau County Social Service Center

Name: *Dawn Anderson*

Title: *Director*

Date: *4-5-17*

I certify that the signatory for Roseau County Social Service Center has lawful authority to bind Roseau County Social Service Center to the terms of this civil rights assurance agreement.

Date: *4-6*, 2017.

By: *Kevin M. Joss*
Roseau County Attorney