



Koochiching County Public Health & Human Services Comprehensive Civil Rights Plan (CCRP)

Koochiching County Public Health & Human Services
1000 Fifth Street
International Falls, MN 56649
218.283.7000
800.950.4630

Updated: 04/12/2022

Civil Rights Coordinator: Essa Eide 218.283.7000
ADA Coordinator: Jenny Herman 218.283.1152
Limited English Proficiency Coordinator: Essa Eide 218.283.7000

This CCRP is in a binder in the lobby.

Americans with Disabilities Act Advisory

This information is available in accessible formats to individuals with disabilities and for information about equal access to services, call 218.283.7000. MN Relay Service: 711 or (800) 627-3529

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1. Purpose

As a recipient of federal financial assistance, Koochiching County Public Health and Human Services is responsible for providing core services to assist and support Minnesota's most vulnerable individuals and families so they can meet their basic needs and be treated with respect and dignity. Koochiching County Public Health and Human Services has a CCRP to ensure that all eligible individuals receive equal access to program services and information. Its programs are operated in a nondiscriminatory way, without regard to race, color, national origin, age, disability, sex, sexual orientation, religion, political beliefs, creed and public assistance status. In medical programs, sex includes sex stereotypes and gender identity under any health program or activity receiving federal funds. This CCRP also serves as a source of information for county agency staff and the general public. It sets out Koochiching County Public Health and Human Service's civil rights administrative policies and procedures, identifying key contacts within the agency and linking the reader to applicable state and federal civil rights laws and resources.

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

Koochiching County Public Health and Human Services designates Essa Eide to serve as the agency's Civil Rights Contact, agency point person on civil rights matters.

Essa Eide
218.283.7000
MN Relay Service: 711 or (800) 627-3529
essa.eide@co.koochiching.mn.us

4. Equal Opportunity Policy and Procedure

Koochiching County Public Health and Human Services Equal Opportunity Policy and Procedure

It is the policy of Koochiching County Public Health and Human Services to make sure that program benefits and services are available to everyone and provided to all eligible individuals without discrimination, in compliance with civil rights laws.

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

Program Accessibility for People with Disabilities

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

To avoid disability discrimination, Koochiching County Public Health and Human 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
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- 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 Forestland Annex building
- Level access into the first floor of the Koochiching County Public Health and Human Services building with elevator access to all other floors

Reasonable Modifications to Policies, Procedures or Practices

Koochiching County Public Health and Human Services will make reasonable modifications to its policies, procedures or practices when necessary to avoid discrimination on the basis of disability, unless Koochiching County Public Health and Human 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

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

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

5. Complaint Resolution Procedure

KOOCHICHING COUNTY PUBLIC HEALTH AND HUMAN SERVICES CIVIL RIGHTS COMPLAINT RESOLUTION PROCEDURE

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

Civil rights complaints allege discrimination. You have a right to file a civil rights complaint if you believe you have been discriminated against because of your race, color, national origin, sex, sexual orientation, age, creed, religion, political beliefs, disability, or public assistance status. **Sex** includes sex stereotypes and gender identity discrimination that occurs in medical or health programs and clinics receiving federal financial assistance, such as Medical Assistance, MnSure, CHIP programs and insurance companies and state health insurance exchanges.

It is against the law for anyone who works for Koochiching County Public Health and Human Services to retaliate against a person who files a complaint or who cooperates in the investigation of a civil rights complaint.

To file a complaint, ask for the agency's equal opportunity policy, complaint resolution procedure, and complaint form. Use the contact information below to file a complaint. You can also review the law and regulations that outlaw discrimination in the Civil Rights contact's office:

Essa Eide
Koochiching County Public Health and Human Services
1000 Fifth Street
International Falls, MN 56649
218.283.7000 (Voice)
800.950.4630 (Toll Free)
218.283.7013 (Fax)
essa.eide@co.koochiching.mn.us

Procedure:

1. Civil Rights complaints **must** be submitted to the Civil Rights contact within 180 days of the date the alleged discrimination occurred. The time-frame for filing a civil rights complaint **must** be at least 90 days, but no longer than 180 days.
 2. A complaint **must** be in writing and contain the name and address of the person filing it. Other important contact information is telephone number, relay number and email
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address. The complaint **must** state the problem or action alleged and the relief desired if you need assistance with your complaint, the Civil Rights contact will help you.

3. The county agency **must** conduct an investigation of the complaint, if it is a true civil rights complaint. The investigation may be informal, but it **must** be thorough and timely. People who have an interest in the complaint **must** have an opportunity to submit relevant evidence about the complaint. The county agency will issue a written decision on the complaint within 120 days after its filing. The county will maintain the complaint records and files for three years. Complaints about program rules are not civil rights complaints and will be resolved through a different complaint process.
4. The person filing the complaint may appeal the decision by writing to the Director within 15 days of receiving the written decision. The Director **must** issue a written decision in response to the appeal, no later than 30 days after the appeal is filed. This decision is final. This appeal process is not the same as filing a fair hearings appeal with the DHS Appeals and Regulations Division.
5. The person filing the complaint must be informed that he/she can file a discrimination complaint **directly** with the U.S. Department of Health and Human Services' Office for Civil Rights or the U.S. Department of Agriculture (USDA) for the SNAP Program.
 - a. The **U.S. Department of Health and Human Services' Office for Civil Rights** prohibits discrimination in its programs because of race, color, national origin, age, disability, sex and religion. **Sex** includes sex stereotypes and gender identity discrimination that occurs in medical or health programs and clinics receiving federal financial assistance; these are programs such as Medicaid, CHIP programs and insurance companies and state health insurance exchanges under Title I of the Affordable Care Act. Contact the federal agency directly:

U.S. Department of Health and Human Services
Office for Civil Rights
Region V
233 N. Michigan Avenue
Suite 240
Chicago IL 60601
312.886.2359 (voice)
800.368.1019 (toll free)
800.537.7697 (TTY)
 - b. USDA requires that the following nondiscrimination statement be provided **exactly** as it is shown below:

In accordance with Federal civil rights law and **U.S. Department of Agriculture** (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and

employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who required alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at 800.877.8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call 866.632.9992. Submit your completed form or letter to USDA by:

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

(2) fax: 202.690.7442; or

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

This institution is an equal opportunity provider.

6. Filing Complaints with State Agencies:

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

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

Minnesota Department of Human Rights

Freeman Building, 625 North Robert Street
St. Paul, MN 55155
651.539.1100 (voice)
800.657.3704 (toll free)
711 or 800.627.3529 (MN Relay)

- b. **The Minnesota Department of Human Services** prohibits discrimination in its programs because of race, color, national origin, creed, religion, sexual stereotypes and gender identity discrimination that occurs in health programs or activities receiving federal financial assistance, such as Medical Assistance, MNCare, CHIP programs and insurance companies and state health insurance exchanges. Contact the Equal Opportunity and Access Division **directly** only if you have a discrimination complaint:

Minnesota Department of Human Services
Equal Opportunity and Access Division
P.O. Box 64997
St. Paul, MN 55164-0997
651.431.3040 (voice) or use your preferred relay service

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

Civil Rights Director
Midwest Regional Office
USDA/ Food and Nutrition Service
77 W. Jackson Blvd., 20th Floor
Chicago, IL 60604-3591
312.353.6657 (voice) or use your preferred relay service

7. Arrangements for People with Disabilities

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

6. 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**

Koochiching County Public Health and Human 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.

Jenny Herman
Director of Administration
Koochiching County
715 Fourth Street
International Falls, MN 56649
218.283.1152
MN Relay Service: 711 or 800.627.3529

- c. **Disability Complaints**

People filing disability complaints will use Koochiching County Public Health and Human Services' civil rights complaint procedure.

d. ADA Notice Document

Koochiching County Public Health and Human Services will use the DHS brochure: *Do you have a disability* (DHS-4133-ENG) as its ADA notice document. This notice document informs applicants, clients and members of the public that Koochiching County Public Health and Human 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.

Koochiching County Public Health and Human 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 Koochiching County Public Health and Human Services Equal Opportunity Policy and Procedure includes provisions which prohibit disability discrimination in human services programs. This policy is located in the agency lobby.

7. Limited English Proficiency Plan

KOOCHICHING COUNTY PUBLIC HEALTH AND HUMAN SERVICES
1000 FIFTH STREET
INTERNATIONAL FALLS, MN 56649

Limited English Proficiency (LEP) Plan
Effective Date:05/01/01
Amended 06/25/10
Amended 11/05/12
Amended 07/20/16
Amended 09/01/16
Amended 04/12/22

Director	Kathy LaFrance	218 283-7000
LEP Coordinator	Essa Eide, Office Services Supervisor	218 283-7000
Financial Assistance	Tracy Lunser, Financial Assistance Supv.	218 283-7000
Social Services	Jean Anderson, Social Services Supv.	218 283-7000
Child Support	Kallie Kantos, Child Support Supv.	218 283-7000
Accounting	Bobbi Sivonen, Fiscal Supervisor	218 283-7000
Health	Derek Foss, Health Supervisor	218 283-7070

100 - Purpose and Legal Basis

The following document serves as the Koochiching County Public Health and Human Services (KCPH&HS) plan to meet the legal obligation of language access requirements in compliance of Title VI of the Civil Rights Act of 1964; 7 CFR, 273 et seq; and 42 CFR 435 et seq. There are four components to this document.

200 - Assessment

300 - Policy

400 - Training

500 - Monitoring

200 - Assessment

201 Needs Assessment - KCPH&HS will at least on an annual basis, make a needs assessment of the unique language needs within Koochiching County. Information accessed on the Minnesota Department of Education Maps of Home Primary Languages will be used to discern the types of non-English languages that are most predominant in Koochiching 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 receiving County-specific data from the Department of Human Services to assist in this form of needs assessment. The following non-English languages have been identified as being the most likely to be encountered in Koochiching County: **Russian and Spanish**

202 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 (HCAPP)** and the **Combined Application Form (CAF)**. Language preferences will be entered into the applicant's primary language field in the MAXIS system. If an interpreter is needed, it also will be entered in the MAXIS system. If the receptionist or worker suspects that the applicant is a person with LEP, they will present the LEP person with a card that lists the seven major languages in order to determine which language is involved, if any. It is expected that reasonable efforts will be made by KCPH&HS to provide same-day interpreter services.

203 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 International Falls. 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.

204 Resources Needed - KCPH&HS has a formal linkage with **Language Line Services (1-844-350-5900)** for Russian, Spanish, and other languages included in **Language Line Services "tier"**

system. When feasible, on-site interpreter services will be made available and would be the first preference. The County does have interactive television (ITV) capabilities. When appropriate, the use of ITV will be considered. Use of reciprocal faxing processes will be used when necessary, to facilitate completion of applications and processing of interviews.

205 Timely Access - Language Line Services are available 24 X 7. Contact with that entity 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 County.

300 Policies and Procedures

301 Agency Commitment – KCPH&HS 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 “Koochiching County Public Health and Human Services”. KCPH&HS has, by prior action, adopted a policy statement entitled Civil Rights Compliance Requirements effective May, 1995.

302 Range of Oral Language Assistance - Use of **Language Line Services** for Russian, Spanish, and all other non-English languages will take place as necessary. KCPH&HS will take advantage of the eight brief “Notice of Rights to Language Services” documents for persons with LEP as they are made available by the Department of Human Services.

303 Uncommon Languages - There may be circumstances when customers present for services use a language other than that most commonly used in Koochiching County. Receptionist staff will refer all such cases to a supervisor or the Director. This person will be responsible for trying to determine 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.

304 Affirmative Action - The KCPH&HS 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.

305 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 the Agency Director. Alternative methods of customer service 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.

306 Competency Standards for Interpreters - Any interpreter used for LEP services must be bilingual; 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 - such as **Language Line Services**, competency is presumed. When using family, friends, or significant others, the intake worker must make a judgment as to the competency of the proposed interpreter. "Certification" as an interpreter is not a pre-requisite.

307 Dissemination of LEP Plan - Copies of the **LEP Plan** will be provided to all KCPH&HS employees. The area Legal Aid office, Koochiching County Courthouse, grantees and contractors will be made aware they can access the **LEP Plan** on the web at www.co.koochiching.mn.us/dept/com_serv/comservmain.htm . A copy of The Interpreter Poster, **DHS-4739**, will be prominently displayed in the KCPH&HS central reception area.

308 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 KCPH&HS find a suitable interpreter, one who can assist the person in completion of necessary forms, documents and the like. KCPH&HS workers need 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.

309 Emergency Situations - When a determination has been made that an emergency exists and LEP considerations are identified as being present, KCPH&HS may waive all proscriptions in order to ensure that necessary emergency services are provided. Extraordinary efforts need to be put forth before circumvention of non-emergency procedures is followed. Consultation with a supervisor or agency director is necessary before such action is taken.

310 Access to and Costs of Interpreters - Under no circumstances will KCPH&HS 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.

311 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 DHS-4739 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 Russian or Spanish will be used as quickly as is feasibly possible when it has been determined that the person presenting for service is not able to understand English. Insofar as the Department of Human Services has translated many forms into multiple languages, KCPH&HS will access these forms as necessary. Access to the Department's website at <http://edocs.dhs.state.mn.us> will be made. Additionally, translated income maintenance forms located on the aforementioned site will be accessed as needed.

312 County-Produced Materials - Insofar as the LEP census in Koochiching County is few, it is not anticipated that KCPH&HS will develop any KCPH&HS produced material. Rather, KCPH&HS 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. KCPH&HS will follow DHS's translation guidelines as required.

313 Complaint Resolution Protocol - Any adverse action taken by KCPH&HS with which an applicant or recipient disagrees is subject to complaint. KCPH&HS has a formal complaint process that can be utilized to try to resolve any dispute. In the absence of local resolution, the person making the complaint will be informed in a language understandable to the grievant, of the process to follow in making a complaint to DHS or the Office of Civil Rights. The complaint procedure will conform in all respects to the extant KCPH&HS procedure included in **Koochiching County Public Health and Human Services Plan, Civil Rights Discrimination Complaint Procedure**. Appropriate use of interpreter 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**.

314 Posting - A copy of the KCPH&HS **LEP Plan** will be located in the central reception area and also can be found at the web address listed in **307** above.

400 Training

401 Distribution of LEP Plan - All KCPH&HS employees will be provided a copy of the **LEP Plan** upon its adoption. If any changes are made in the document, a notice of the revised copy will be provided to the same entities listed in **307** above.

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

- All Financial Assistance Staff & Supervisor
 - All Social Services Staff & Supervisor
 - All Child Support Staff & Supervisor
 - All Office Support Staff & Supervisor
 - All Accounting Staff & Supervisor
 - All Health Staff & Supervisor
 - Agency Director
-

402 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, this document will be incorporated into that person’s “generic orientation” protocol at the time of hire.

403 Training of Staff - Ongoing - On at least an annual basis through communication with staff, a review of the LEP Plan will take place.

500 - Monitoring

501 Evaluation of the LEP - On at least an annual basis, the LEP Plan will be reviewed for effectiveness. It will be coordinated by the KCPH&HS 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 Koochiching County
- ◆ Assessment of current language needs of KCPH&HS applicants and clients to determine if the client needs an interpreter and/or translated materials; updating case files which lack information about a client’s language preference; determining if clients need to be asked their language preference at the time of certification.
- ◆ Determining whether existing assistance is meeting the needs of applicants and clients with LEP.
- ◆ Assessing whether staff members understand KCPH&HS LEP policies and procedures and how to carry them out, and whether language assistance resources and arrangements for those resources are still current and accessible.
- ◆ Seeking and obtaining feedback from non-English or limited-English speaking communities in Koochiching County including applicants and clients as well as any known community organization or advocacy group working with non-English or limited-English speaking communities.

02 LEP Contact Person - For purposes of the LEP Plan, Koochiching County’s designated contact person is the KCPH&HS Administrative Secretary with appropriate delegation made to the Director and supervisors in the Agency.

- 8. Annual Civil Rights Training for the Supplemental Nutrition Assistance Program (SNAP)**
Koochiching County Public Health and Human Services will conduct annual SNAP civil rights training for all staff who administer the SNAP program and all staff who have direct contact with the public, such as support staff, supervisors and managers.
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Koochiching County Public Health and Human Services will use DHS' PowerPoint presentation to train staff, document the date of the training each year and document who attends the training.

9. Civil Rights Assurance of Compliance

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

10. CCRP Administration

Koochiching County Public Health and Human Services will:

- Provide a copy of its CCRP in the agency lobby where members of the public can review it and email to all staff for review.
- 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
- 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. Koochiching County Public Health and Human Services will document the date of the training each year and document who attends the training.

11. Appendix

- a. **Attachment A – Full List of Legal Authorities**
 - b. **Attachment C – DHS Brochure: *Do you have a disability*; DHS-4133-ENG**
 - c. **Attachment D – Signed Copy of the *2016 Civil Rights Assurance of Compliance***
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ATTACHMENT A

KOOCHICHING COUNTY PUBLIC HEALTH AND HUMAN SERVICES CIVIL RIGHTS PLAN 2016 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, 363A

ATTACHMENT D

**MINNESOTA DEPARTMENT OF HUMAN SERVICES
CIVIL RIGHTS ASSURANCE OF COMPLIANCE**

NONDISCRIMINATION IN STATE AND FEDERALLY FINANCED PROGRAMS

KOOCHICHING COUNTY PUBLIC HEALTH AND HUMAN 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 Departments of Health and Human Services and Agriculture. The County Agency agrees that compliance with this Assurance is a condition of continued receipt of federal financial assistance and that it is binding upon the County Agency directly or through contract, license, or other provider of services, as long as it receives federal or state financial assistance; and shall be submitted with the required Comprehensive Civil Rights Plan update.

THE COUNTY AGENCY ASSURES that it will comply with:

Title VI of the Civil Rights Act of 1964, as amended; Department of Health and Human Services, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons; Age Discrimination Act of 1975, 42 U.S.C. 6101, as amended; Section 504 of the Rehabilitation Act of 1973, as amended; Section 508 of the Rehabilitation Act of 1973, as amended; Title II of the American 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, 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 period of the investigation or after it has been concluded. If there are any violations of this assurance, DHS shall have the right to invoke fiscal sanctions or other legal remedies in accordance with Minnesota Statutes, section 256.017.

THE PERSON WHOSE SIGNATURE APPEARS BELOW is authorized to sign this Assurance and commit the County Agency to its terms.

7/25/2014 Kathy LaFrance
Date Director's Signature

I CERTIFY that the signatory for the County Agency has lawful authority to bind the County Agency to the terms of this civil rights Assurance.

July 22, 2016 [Signature]
Date County Attorney's Signature

