

Foodbank®

St. Louis Area Foodbank

CIVIL RIGHTS
USDA training

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CIVIL RIGHTS

Introduction

Welcome

Welcome to the St. Louis Area Foodbank's (SLAFB's) civil rights and nondiscrimination training.

We commit to educating ourselves at least once a year about civil rights policy under the USDA Food and Nutrition Service (FNS).

The FNS administers federal nutrition assistance programs, like TEFAP and CSFP (often called senior boxes).

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Introduction

Why we train

The FNS requires us to train TEFAP and CSFP distribution site staff and volunteers on civil rights to ensure equitable program access. We'll use this training opportunity to check where we are and fill any gaps.

Training also helps us identify and talk through confusing points that could inhibit us from taking necessary action.

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Introduction

Code of conduct

SLAFB staff primarily refer to the *Team Member-Employee Handbook* for guidance on how to prevent discrimination. SLAFB partners refer to the *Partner Agreement*, found in the *Partner Manual*.

As a condition of employment or partnership, our code of conduct applies to all our neighbors, whether or not we supply them with USDA food.

Let's check how our standards compare with the FNS. How do we define discrimination?

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Introduction



FNS Instruction 113-1

Discrimination: The act of distinguishing one person or group of persons from others, either intentionally, by neglect, or by the effect of actions or lack of actions based on their protected bases.

SLAFB Employee Handbook

No person is excluded from services because of Protected Class.

There is no segregation of persons served on the basis of Protected Class.

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Word choice

Our intent to protect neighbors in need is the same as the FNS, but the words we use to talk about discrimination are different.

When it comes down to identifying and documenting discrimination, differences in word choices can cause confusion.

Let's review what our resources say about protected classes.

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Public resources

When we inform the public about programs distributing USDA food, we use...

- The *Nondiscrimination Statement*
- The *And Justice for All* poster

Both resources describe:

- Neighbors' rights and responsibilities
- The USDA's nondiscrimination policy
- The USDA's civil rights discrimination complaint filing procedure

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Introduction

Training resource

The FNS wrote the public-facing resources. *FNS Instruction 113-1* determines the definitions and topics we'll cover today. We use all three resources, as required by law. That's why we were surprised to learn that the list of protected bases in our training is different from what the public sees on the poster and the *Nondiscrimination Statement*. Let's do another side-by-side comparison.

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Introduction



Public-facing resources

Prohibit discrimination based on:

- Race
- Color
- National origin
- Sex (including gender identity and sexual orientation)
- Age
- Disability
- Reprisal or retaliation for prior civil rights activity

FNS Instruction 113-1

Prohibits discrimination based on:

- Race
- Color
- National origin
- Sex
- Age
- Disability

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Introduction

What to do?

By now, you may be wondering:

“How are we supposed to help our neighbors? Which of these resources should we use?”

Remember: We’re united in our intent to respect and protect our neighbors.

There’s a common-sense approach to helping identify, prevent, or document discrimination.

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Take action

Refer to the communication our neighbors have access to—start where they are.

If a neighbor has a complaint but you aren't sure their basis of discrimination is protected by law, please help them to file a complaint, no matter their reason—trust the process.

The big picture—ending discrimination—is important enough to **take action**.

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Introduction

FNS topics

The FNS civil rights training topics we'll cover today are:

- Effective public notification systems
- Customer service
- Data collection and use
- Requirements for reasonable accommodation of persons with disabilities
- Requirements for language assistance
- Conflict resolution
- Complaint procedures
- Compliance review techniques
- Resolution of noncompliance

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Introduction

Action items

Because the FNS requires that we take specific actions to protect our TEFAP and CSFP neighbors, and because you may have questions about how to do that, we'll conclude our training with **action items**.

We'll provide examples and a practical takeaway document aligned with FNS policy.

We'll also provide contact information so you can get your questions answered.

More about that as we go!

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Public notification

The first part of effective public notification is making sure USDA nutrition program information reaches people in need. The tricky part is that this population is always changing.

To prevent guesswork, the FNS requires us to provide CSFP and TEFAP information to grassroots organizations and to the general public upon request.

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Program information

The next part is determining what information our neighbors most need to get TEFAP and CSFP food. The FNS requires us to share:

- Program availability
- Participant rights and responsibilities
- USDA's nondiscrimination policy
- Procedure for filing civil rights discrimination complaints

Let's talk about program availability first.

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Availability

CSFP and TEFAP availability information includes details like when and where USDA food will be distributed.

As we know, programs change. That's why the FNS requires us to promptly inform our service communities of any changes to distribution hours, day of the week, or location.



Special thanks to partners who routinely check and update their hours and contact information on SLAFB's website.



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Operating hours

In addition to websites, we use all kinds of communications to get the word out about when we're open to neighbors. The main rules are to make sure we communicate our hours of operation consistently in writing, and don't rely only on word of mouth.

We'll cover more specifics about hours of operation in SLAFB's TEFAP and CSFP courses.



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**AND
JUSTICE
FOR ALL**

In accordance with Federal 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, age, disability, and reprisal or retaliation for prior civil rights activity. (Not all prohibited bases apply to all programs.)

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, and American Sign Language) should contact the responsible State or local Agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or 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.ascr.usda.gov/sites/default/files/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, 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 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; or

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

email:
program.intake@usda.gov.

This institution is an equal opportunity provider.

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La información del programa puede estar disponible en otros idiomas además del inglés. Las personas con discapacidades que requieran modos de comunicación alternativos para obtener información sobre el programa (por ejemplo, Braille, letra agrandada, grabación de audio y lenguaje de señas americano) deben comunicarse con la agencia estatal o local responsable que administra el programa o con el TARGET Center del USDA al (202) 720-2600 (voz y TTY) o comunicarse con el USDA a través del Servicio Federal de Transmisión de Información al (800) 877-8339.

Para presentar una queja por discriminación en el programa, el reclamante debe completar un formulario AD-3027, Formulario de queja por discriminación del programa del USDA, que se puede obtener en línea, en <https://www.ascr.usda.gov/sites/default/files/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, en cualquier oficina del USDA, llamando al (866) 632-9992, o escribiendo una carta dirigida al USDA. La carta debe contener el nombre, la dirección y el número de teléfono del reclamante, y una descripción escrita de la supuesta acción discriminatoria con suficiente detalle para informar al Subsecretario de Derechos Civiles (ASCR, por sus siglas en inglés) sobre la naturaleza y la fecha de la presunta violación de los derechos civiles. La carta o el formulario AD-3027 completado debe enviarse al USDA por medio de:

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

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

correo electrónico:
program.intake@usda.gov.

Esta institución ofrece igualdad de oportunidades.

Form AD-3027 - (Rev. 11/2016) (English) (September 2016) <https://www.ascr.usda.gov/sites/default/files/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>

Poster

The FNS requires us to prominently display the *And Justice for All* poster in plain view at TEFAP and CSFP sites. The poster contains the *Nondiscrimination Statement*. The statement covers:

- Neighbor rights and responsibilities
- Information for neighbors on filing a civil rights discrimination complaint
- USDA's nondiscrimination policy

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Poster versions

You may have noticed that apart from program availability, the *Nondiscrimination Statement* covers all the remaining written requirements of public notification.

The *And Justice for All* poster is printed in different versions for different programs, so it's important we display the correct one to meet public notification requirements.

For Illinois and Missouri, version AD-475A is the correct one to display at both TEFAP and CSFP sites.

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Statement

As with operating hours, we use all kinds of communications to reach our neighbors. We're required to include the *Nondiscrimination Statement* on any printed or digital program information that mentions USDA food, TEFAP, or CSFP. This requirement applies to program application forms, notifications of eligibility or ineligibility, notification of adverse action, and webpages.

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The whole picture

Fun fact: The building we saw on the *And Justice for All Poster* is the Justice Department. Makes sense, right?

Pictures are worth thousands of words. The USDA recognizes this and requires that we convey the message of equal opportunity in all photos and other graphics in materials that provide USDA program-related information.

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Next steps

Public notification is a big topic. There's a lot of steps to keep track of and care for to make sure we stay in compliance.

We've included resources (such as website links) and a summary of public notification activities in our **action items** document.

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Customer service

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*Customer
service*

Serving our neighbors

When it comes to customer service, we aren't being asked to learn anything new or commit to anything different than we do already in our *Partner Agreement*.

Let's review how we agreed to serve our neighbors.

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*Customer
service*

Partner Agreement

SLAFB agrees to:

- Serve our partners with the utmost integrity
- Strive to provide quality service
- Work to be accountable when experiences are unsatisfactory
- Listen to the needs of our network
- Assume positive intent
- Seek to understand

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*Customer
service*

The logo for Foodbank St. Louis Area Foodbank. It features the word "Foodbank" in a white, sans-serif font with a registered trademark symbol. Above the letter "o" in "Foodbank" is a stylized white flame or leaf shape. Below "Foodbank" is the text "St. Louis Area Foodbank" in a smaller, italicized, white sans-serif font.

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Partner Agreement

Partners agree to:

- Work alongside SLAFB to create an atmosphere of mutual respect that promotes partnership, kindness, concern, fairness and appreciation
- Display courtesy and respect in words and actions towards all SLAFB staff and fellow partners

To provide good customer service, we simply treat our neighbors as we would treat one another.

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Customer service

Customer service

These tips for good customer service are based on civil rights training from the state of Illinois:

- Recognize that neighbors have varied needs and few resources
- Listen actively when a neighbor feels they have been treated in a rude or discourteous manner
- Learn to practice empathy when resolving conflict

We captured these tips in our **action items**.

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Data collection and use

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*Data collection
and use*

Data we collect

Data collection and use refers to a FNS civil rights requirement that we ask for and store data about *race* and *ethnicity* from neighbors receiving CSFP boxes.

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*Data collection
and use*

TEFAP is exempt

The FNS exempts some programs from their requirement to collect race and ethnicity data. TEFAP is exempt. We are not required to ask TEFAP neighbors about their race or ethnicity for the FNS.

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Data collection and use

Data we collect

During a neighbor intake process, CSFP neighbors provide their **ethnicity** when they state they are either:

- *Hispanic or Latino*
- *Not Hispanic or Latino*

Then, neighbors provide their **race** when they state they are any of the following:

- *American Indian or Alaskan Native*
- *Asian*
- *Black or African American*
- *Native Hawaiian or other Pacific Islander*
- *White*

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Data collection and use

Why we collect data

The FNS collects CSFP neighbor data to prevent discrimination.

The FNS uses this data to:

- Determine how effective programs are at reaching potentially eligible neighbors
- Identify areas where additional outreach is needed
- Assist location selection for compliance reviews
- Complete required reports

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Neighbors' choice

CSFP neighbors may decline to self-identify—that's their choice.

While we're required to ask, CSFP neighbors are not required to provide information on their race or ethnicity. This information isn't necessary to determine their eligibility to receive USDA food through CSFP distributions.

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Data lifecycle

We care for race and ethnicity data by maintaining record-keeping systems according to federal law. In our CSFP neighbor data lifecycle, we:

- Store data for four years (three full calendar years and the current year)
- Maintain data under safeguards that restrict access to authorized personnel only
- Submit data to government agencies through required reports

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Next steps

Do you have any questions about handling civil rights data, or any other data?

One goal in training is to clarify processes like collecting, using, and protecting data that may go beyond civil rights data. We would like to hear from you if you'd like further assistance on this topic.

Please check out our **action items** document for contact information and a recap of the data lifecycle.

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Requirements for
reasonable
accommodation of
persons with
disabilities

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*Requirements
for reasonable
accommodation
of persons with
disabilities*

Program access

Most of what we'll talk about in this section has to do with how our TEFAP and CSFP partners provide program access for neighbors with disabilities.

First, we'll review who the FNS refers to as *persons with disabilities*. Then we'll learn about physical accommodations and communication modifications to ensure program access to TEFAP and CSFP.

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Disability defined

A **person with a disability** is someone who has a physical or mental impairment which substantially limits one or more *major life activities*, has a record of such an impairment, or is regarded as having such an impairment.

The ADA Amendments Act of 2008 clarified and broadened what *major life activities* includes to make it easier for more people to gain needed access. Let's review that next.

Policy guidance provided by IDHS FY24 Civil Rights training, updated 11.01.2023, and the US EEOC Questions and Answers on the Final Rule Implementing the ADA Amendments Act of 2008 website.

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Major life activities

Major life activity means functions such as caring for self, performing manual tasks, walking, seeing, hearing, speaking, *major bodily functions*, learning, and working.

Major bodily functions include the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, and reproductive functions.

Definitions provided by IDHS FY24 Civil Rights training, updated 11.01.2023, and the US EEOC Questions and Answers on the Final Rule Implementing the ADA Amendments Act of 2008 website.

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of persons with
disabilities*

Integrated settings

Title II requires public entities to administer services, programs, and activities in *the most integrated setting* appropriate to the needs of qualified individuals with disabilities.

The most integrated setting enables neighbors with disabilities to interact with nondisabled neighbors to the fullest extent possible.

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Facilities

Thanks to the ADA (Americans with Disabilities Act), most of us are already aware that we must ensure physical accessibility to our buildings and facilities, particularly for neighbors in wheelchairs and other power-driven mobility devices.

Physical accessibility also applies to our neighbors' service animals.

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*Requirements
for reasonable
accommodation
of persons with
disabilities*

Communication

Our goal is to ensure communication with neighbors with disabilities is as effective as communication with others. Here are a few suggestions.

- Provide qualified sign language interpreters or other auxiliary aids and services for persons with hearing loss.
- Provide Braille, large print, or audio recordings for persons with low vision.

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accommodation
of persons with
disabilities*

Internet

As programs and offices modernize, we've begun to learn more about making reasonable modifications to websites and online application systems.

We've included free USDA communication resources and US government digital accessibility resources in our **action items** document to help raise awareness and provide practical support.

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Requirements for language assistance

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*Requirements
for language
assistance*

Communication

The civil rights goal for language assistance is to prevent discrimination based on national origin. We refer to neighbors with limited English proficiency as LEP neighbors.

To ensure communication with LEP neighbors is as effective as communication with others, we need to take reasonable steps to identify a language our neighbors speak fluently and provide translation.

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*Requirements
for language
assistance*

Resources

The USDA supplies a wide array of free LEP resources to assist us in identifying languages. In addition, the USDA provides program information, materials, and services in the appropriate languages.

We'll share these resources in the **action items** document.

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Conflict resolution

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*Conflict
resolution*

Preventing conflict

One way that the St. Louis Area Foodbank strives to prevent conflict is to provide assurances (such as contracts and forms). We've agreed in writing that we won't participate in discrimination.

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resolution*

Partner Agreement

We agreed:

- To work together to create an atmosphere that does not hinder partnership, kindness, concern, fairness, or appreciation
- Not to engage in conduct related to SLAFB that would compromise or call into question the integrity or mission of SLAFB
- To resolve differences together in an appropriate manner through transparent and purposeful communication and without the use of offensive, abusive, or disrespectful language or actions

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resolution*

Managing conflict

The state of Missouri encourages us to apply **conflict resolution** to resolve issues as they arise.

The goal is to resolve differences raised by TEFAP and CSFP neighbors before their concerns escalate to a formal civil rights complaint process.

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resolution*

Key components

Let's review some key components and a general conflict resolution process provided by the state of Illinois.

We can:

- Control our own emotional responses
- Seek understanding
- Identify needs and common interests
- Seek mutual benefits or purpose

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*Conflict
resolution*

Resolution process

A general process for constructive conflict resolution:

- Define the problem/issue/complaint
- Identify the activity causing conflict and assess information in detail
- Recognize, respect and respond to the feelings of those involved in the conflict while working toward a mutual resolution

We've included the key components and resolution process in our **action items** document.

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Complaint procedures

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Complaint procedures

CRD complaints

Civil rights discrimination (CRD)

complaints concern actions that restrict or block access to TEFAP or CSFP food based on a participant's protected class.

FNS requires assurances that we'll report civil rights discrimination complaints.

Our role is to identify and report complaints—we don't determine if discrimination took place. Let's talk about how this works.

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Complaint procedures

Formal

The most direct way to file a CRD complaint about a USDA program is for the person concerned to submit paperwork to the USDA. This is the main reason why adding the *Nondiscrimination Statement* to our program materials is so important. The statement provides LEP information and reporting information for filing formal CRD complaints with the USDA.

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Complaint procedures

Informal

Filing a CRD complaint could begin informally, initiated by someone who maybe doesn't know much about identifying discrimination or the established process for reporting it.

For example, a TEFAP or CSFP participant might mention a concern in casual conversation to any staff member or volunteer at the foodbank, distribution site, or the state. They may not call it discrimination, but we would recognize it from our training.

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Confidentiality

We must maintain confidentiality—this is extremely important. Complaints can be made anonymously.

If someone suspects that a neighbor is unsatisfied with the services at a distribution site, they may raise concerns about discrimination.

Whether or not they wish to file a CRD complaint with the USDA, we should document what took place.

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Information

The USDA complaint form and the Illinois TEFAP complaint form are excellent guides to the kind of information we should collect. These forms are both available in several languages.

Collect as much information as possible about the discriminatory event by filling in or following the general outline provided by these forms.

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Complaint procedures

Getting started

To help make things right, the USDA, Illinois, and Missouri are all looking for the same basic information, if the person or people concerned are willing to supply it.

An easy way to begin is to describe when the discriminatory event took place. Did it happen one time, or take place over several occurrences? It may help to refer to a calendar.

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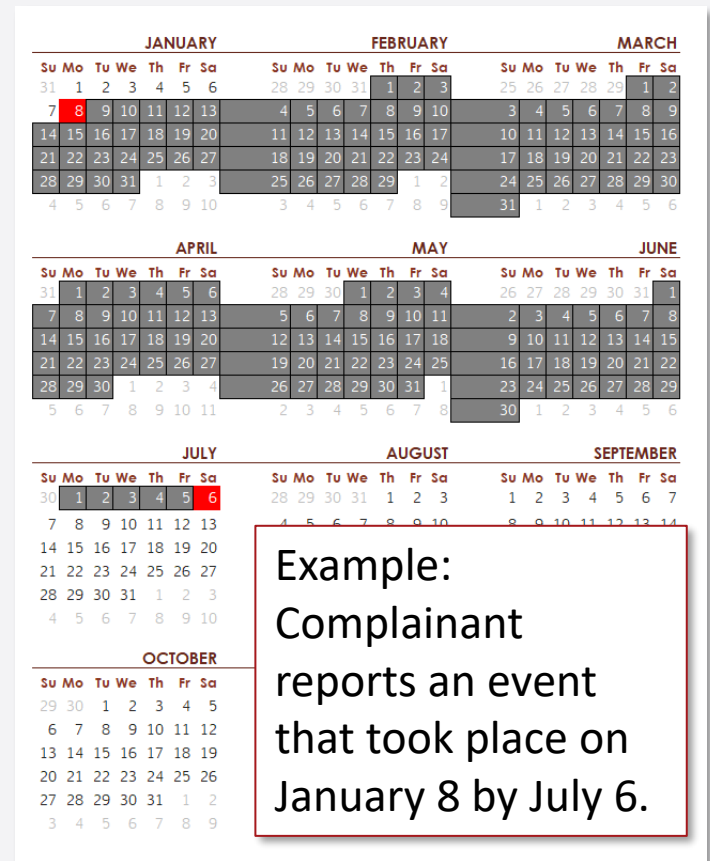
Complaint procedures



Date of the event

The USDA will investigate complaints of a discriminatory event that took place in the past 180 days (about **six months**).

The law provides time for complaints to surface, which makes sense. Emotions or communication barriers could slow down someone's ability to express their concerns.



Example:
Complainant reports an event that took place on January 8 by July 6.

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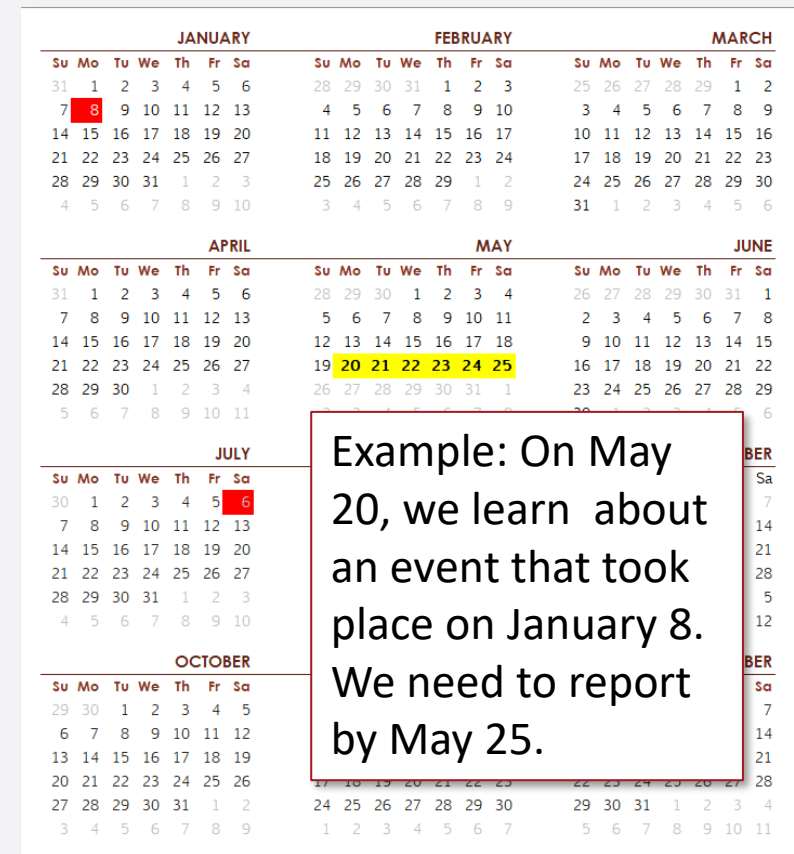
Complaint procedures



Date of the report

Once we recognize a CRD complaint—in conversation, in writing, or anonymously—we need to report it within **five days**.

This also makes sense, to act quickly for resolution once a situation is understood. The first step is documenting what took place.



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Documenting

When filling in a form, remember: the goal is to get help. While the form has a place to put in a name, names are not required.

Anonymous reports are OK.

When documenting information, we may want to have a form nearby to refer to even if we don't fill it in. There's no requirement to fill in a form—the USDA and other agencies will accept the information.

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Complaint procedures

Submitting

Submit documentation in the way that is easiest and most comfortable—by phone, fax, email, or delivering a report on paper.

Documentation can be submitted to:

- SLAFB
- The state (Missouri or Illinois)
- The USDA

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Complaint procedures

SLAFB

Partners and neighbors may find it easiest to talk with SLAFB staff because of long-standing relationships in the community.

SLAFB is obliged to follow a special process when accepting civil rights discrimination documentation. The staff logs CRD complaints separately from other program complaints to help maintain confidentiality in record-keeping. Then SLAFB contacts the appropriate state agency.

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Complaint procedures

States

Partners and neighbors can submit documentation to state agencies directly.

States are obliged to inform complainants of their option to file a CRD complaint with the USDA, but they won't pass the complaint on themselves—that decision remains in the hands of the complainant.

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Complaint procedures

Next steps

Sometimes after submitting documentation locally or at the state level, the person concerned changes their mind and decides to file a formal complaint with the USDA. In this case, the documentation we captured earlier will be very helpful for them.

We'll provide links to filing instructions and forms, and a step-by-step guide for documenting complaints in our **action items**.

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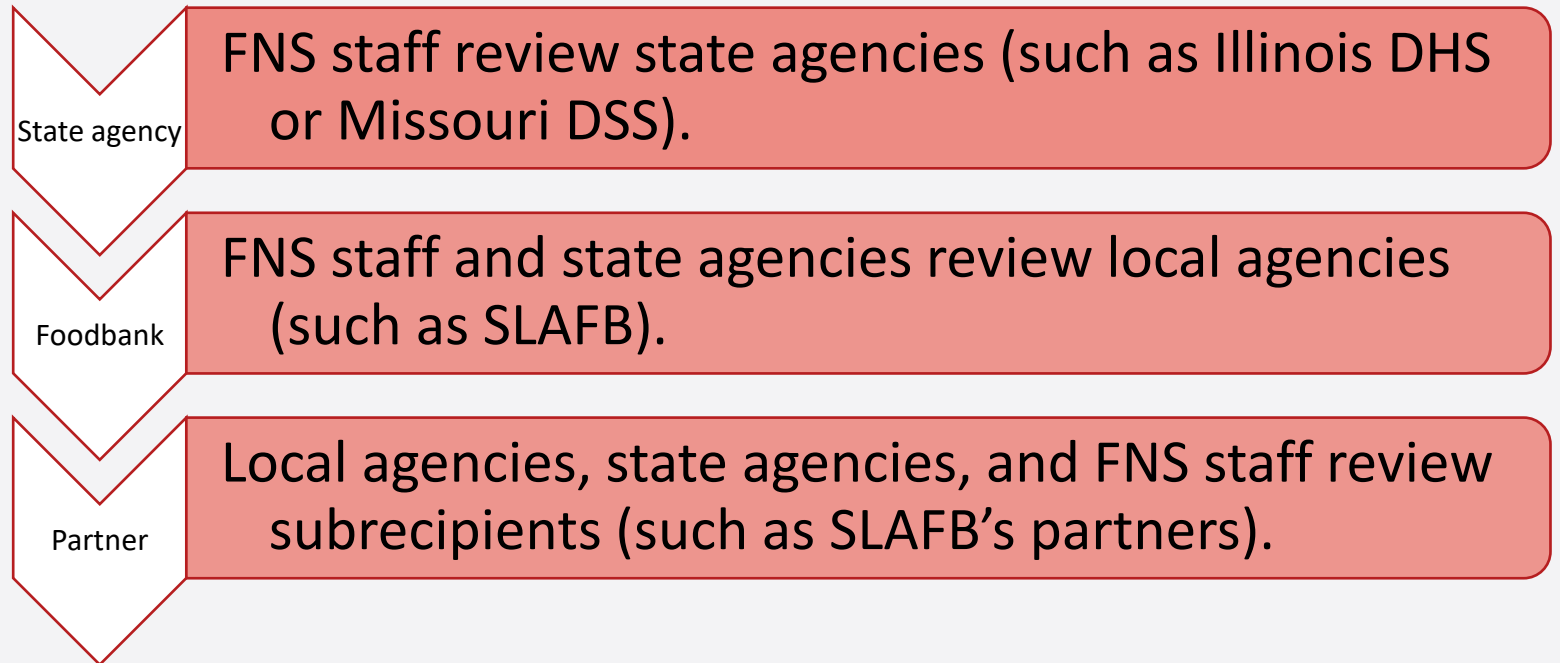
Compliance review techniques

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Reviewers

Reviewers visit USDA food distribution sites to assess civil rights compliance.



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Review types

There are three types of compliance reviews:

- Pre-award
- Routine (post-award)
- Special

Pre-award partners are applying to distribute TEFAP and CSFP food.

Those of us who already distribute TEFAP and CSFP food have **post-award** status.

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Pre-award reviews

State agencies usually conduct pre-award reviews remotely, by reading application information. Their review determines whether the applicant partner complies with program-related federal civil rights statutes and regulations.

No federal funds are provided to state agencies or other potential recipients until the applicant partner “passes” this review.

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Routine/post-award

The FNS and state agencies conduct routine (or post-award) reviews.

The reviewer visits distribution sites and asks questions to assess all civil rights compliance areas. More about these questions later, in our **action items** section.

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Special reviews

The USDA's Office of the Assistant Secretary for Civil Rights conducts special reviews. They may lead these reviews together with FNS staff or run their review independently. Their reviews may be scheduled or unscheduled.

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Findings

Sometimes reviewers *find* that the organization under review isn't in compliance with civil rights regulations.

When this happens, the law requires reviewers to provide significant **findings** in writing both to the reviewed organization and to the FNS.

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Special reviews

Special reviews are never routine. A special review may occur for several reasons. They could be conducted:

- In follow-up to previous findings of noncompliance
- To investigate reports of noncompliance by other agencies, media, or grassroots organizations
- To resolve a specific incident or policy
- To investigate a history of statistical underrepresentation of a group(s)
- In response to a pattern of discrimination complaints

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Preparation

Advance preparation and organization are the best ways to perform well during a review.

In our **action items** document, we've provided "to do" suggestions to help partners get organized, listing typical review items to help partners prepare.

Be sure to check out our contact information. Please reach out with questions about any challenges you experience getting organized and preparing for civil rights reviews.

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Resolution of noncompliance

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*Resolution of
noncompliance*

Noncompliance

If a civil rights review returns a **factual finding of noncompliance**, what happens next?

The next steps are time-sensitive. The date of the reviewer's written findings starts the clock: the organization is required to take action to obtain compliance immediately.

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*Resolution of
noncompliance*

Resolution

A **voluntary resolution agreement** is a written agreement with FNS to ensure compliance with federal civil rights laws. The agreement takes place between the reviewer who found noncompliance and the organization they reviewed. The agreement can close out a civil rights review instead of issuing a written report with findings.

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Action items

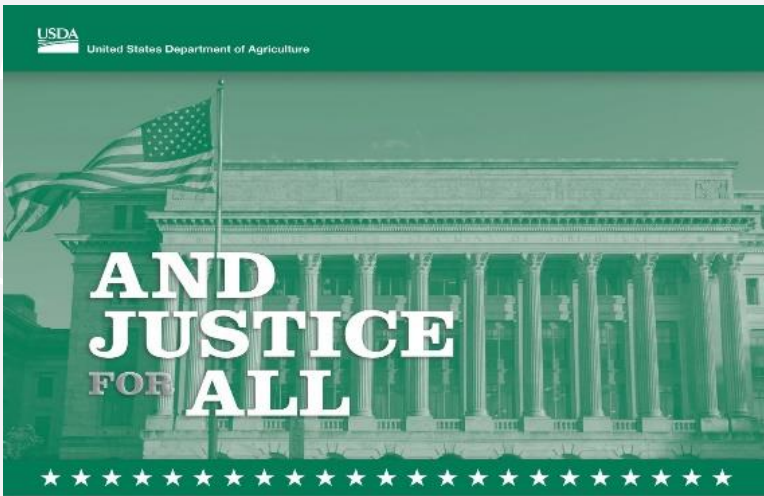
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Civil rights at work



To wrap up, we'll quickly recap some of the tools and resources we covered today.



USDA
United States Department of Agriculture

AND JUSTICE FOR ALL

In accordance with Federal 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, age, disability, and reprisal or retaliation for prior civil rights activity. (Not all prohibited bases apply to all programs.)

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, and American Sign Language) should contact the responsible State or local Agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or 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.ascr.usda.gov/sites/default/files/USDA-OASCR%20P-Complaint-Form-0908-0002-008-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 692-9992, 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 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; or

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

email:
program.intake@usda.gov.

This institution is an equal opportunity provider.

Conforme a la ley federal y las políticas y regulaciones de derechos civiles del Departamento de Agricultura de los Estados Unidos (USDA), esta institución tiene prohibido discriminar por motivos de raza, color, origen nacional, sexo, edad, discapacidad, venganza o represalia por actividades realizadas en el pasado relacionadas con los derechos civiles. (No todos los principios de prohibición aplican a todos los programas.)

La información del programa puede estar disponible en otros idiomas además del inglés. Las personas con discapacidades que requieran medios de comunicación alternativos para obtener información sobre el programa (por ejemplo, Braille, letra agrandada, grabación de audio y lenguaje de señas americano) deben comunicarse con la agencia estatal o local responsable que administre el programa o con el TARGET Center del USDA al (202) 720-2600 (voz y TTY) o comunicarse con el USDA a través del Servicio Federal de Transmisión de Información al (800) 877-8339.

Para presentar una queja por discriminación en el programa, el reclamante debe completar un formulario AD-3027, Formulario de queja por discriminación del programa del USDA, que se puede obtener en línea, en <https://www.ascr.usda.gov/sites/default/files/USDA-OASCR%20P-Complaint-Form-0908-0002-008-11-28-17Fax2Mail.pdf>, en cualquier oficina del USDA, llamando al (866) 692-9992, o escribiendo una carta dirigida al USDA. La carta debe contener el nombre, la dirección y el número de teléfono del reclamante, y una descripción escrita de la supuesta acción discriminatoria con suficiente detalle para informar al Subsecretario de Derechos Civiles (ASCR, por sus siglas en inglés) sobre la naturaleza y la fecha de la presunta violación de los derechos civiles. La carta o el formulario AD-3027 completado debe enviarse al USDA por medio de:

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

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

correo electrónico:
program.intake@usda.gov.

Esta institución ofrece igualdad de oportunidades.

Form AD-3027 - And Justice For All (September 2016)

Public notification

The “And Justice for All” poster must be prominently displayed anywhere TEFAP and CSFP food is distributed. The action items document provides details about the correct version.

SLAFB can help partners replace missing, damaged, outdated, or incorrect versions.

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Data collection/use

CSFP partners learn how to collect race and ethnicity data in SLAFB's CSFP courses.

State agencies audit our records to see if they contain race and ethnicity data. An example of lawful data collection is shown here on the Missouri CSFP application form.

NAME OF APPLICANT					
ETHNIC AND RACIAL DATA (OPTIONAL) MARK YOUR RACE (SELECT ONE OR MORE)					
ARE YOU OF HISPANIC OR LATINO ORIGIN?	American Indian or Alaskan Native	Asian	Black or African American	Native Hawaiian or Other Pacific Islander	White
<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
BEFORE SIGNING, BE AWARE OF YOUR RIGHTS AND WHAT YOUR SIGNATURE MEANS:					
...tion in the program are the ... of race, color, national					

I Speak Statements

- | | |
|---|--|
| <input type="checkbox"/> Unë flas shqip (Albanian) | <input type="checkbox"/> N̄ a po Klào Wia. (Kru) |
| <input type="checkbox"/> አማርኛ ቋንቋ (Amharic) | <input type="checkbox"/> ຄົນເຢຍລະມັນ ຈາກເມັງກວ. (Lao) |
| <input type="checkbox"/> انا اتكلم اللغة العربية. (Arabic) | <input type="checkbox"/> Yie gorngv Mienh waac. (Mien) |
| <input type="checkbox"/> ես խոսում եմ հայերեն (Armenian) | <input type="checkbox"/> म नेपाली बोल्छु (Nepali) |
| <input type="checkbox"/> আমি বাংলা জানি। (Bengali) | <input type="checkbox"/> Mówię po polsku. (Polish) |
| <input type="checkbox"/> Ja govorim bosanski jezik (Bosnian) | <input type="checkbox"/> Eu falo Portugês. (Portuguese) |
| <input type="checkbox"/> မြန်မာစကားပြောပြနိုင်ပါသည်။ (Burmese) | <input type="checkbox"/> ਇ ਮੁਖਿਅਕ ਪੰਜਾਬੀ (Punjabi) |
| <input type="checkbox"/> 我说中文 (Chinese Simplified) | <input type="checkbox"/> Cunosc limba Română. (Romanian) |
| <input type="checkbox"/> 我说中文 (Chinese Traditional) | <input type="checkbox"/> Я говорю по-русски. (Russian) |
| <input type="checkbox"/> Ja govorim hrvatski. (Croatian) | <input type="checkbox"/> Ou te tautala faaSamoa. (Samoan) |
| <input type="checkbox"/> اینجانب به زبان فارسی صحبت می کنم (Farsi) | <input type="checkbox"/> Govorim srpski. (Serbian) |
| <input type="checkbox"/> Je parle français. (French) | <input type="checkbox"/> Waxaan ku hadlaa Somali. (Somali) |
| <input type="checkbox"/> Je parle le Français haïtien(French Creole) | <input type="checkbox"/> Yo hablo español. (Spanish) |
| <input type="checkbox"/> Μιλώ ελληνικά. (Greek) | <input type="checkbox"/> اتحدث السومالية (لغوي سوداني) (Sudanese) |
| <input type="checkbox"/> ངེད་ གཤམ་འཛེག་ ལེན་ ལུ་ (Gujarati) | <input type="checkbox"/> Marunong po akong magsalita ng Tagalog. (Tagalog) |
| <input type="checkbox"/> Mwen pale Kreyòl. (Haitian Creole) | <input type="checkbox"/> ประเทศไทย (Thai) |
| <input type="checkbox"/> मैं हिंदी बोलता हूँ (Hindi) | <input type="checkbox"/> ᐱᐅ ᑎᑦᑭᑦᑦ ᑭᑭᑭᑦᑦ ᐱᑦ. (Tigrinya) |
| <input type="checkbox"/> Kuv hais lus hmoob. (Hmong) | <input type="checkbox"/> Я розмовляю українською. (Ukrainian) |
| <input type="checkbox"/> Ana ma a su Igbo (Igbo) | <input type="checkbox"/> میں اردو بولتا، بولتی ہوں۔ (Urdu) |
| <input type="checkbox"/> Parlo Italiano (Italian) | <input type="checkbox"/> Tôi nói tiếng Việt. (Vietnamese) |
| <input type="checkbox"/> 私は日本語を話します (Japanese) | <input type="checkbox"/> יידיש רעד איך (Yiddish) |
| <input type="checkbox"/> Mi chat Jamiekian langwizj (Jamaican Creole) | <input type="checkbox"/> Mo gbo Yoruba (Yoruba) |
| <input type="checkbox"/> ខ្ញុំប្រើភាសាខ្មែរ (Khmer) | |
| <input type="checkbox"/> 본업의 모국어는 한국어입니다 (Korean) | |
| <input type="checkbox"/> نه ز زماني كوردی ده تاخه. (Kurdish) | |

USDA is an Equal Opportunity Provider, Employer and Leader

“I speak...”

We can use the USDA’s *I Speak Statements* card as a resource to identify an unfamiliar language spoken by an LEP neighbor.

Neighbors point to select the language they speak. The English name for their language is printed in parentheses after their selected “I speak...” statement.

Illinois TEFAP

Both the USDA and the State of Illinois provide free forms to document CRD complaints. Translations in other languages are available.

Because using a form is optional, states are not required to provide complaint forms. There isn't a CRD form for Illinois CSFP, Missouri TEFAP, or Missouri CSFP.

Effective public

State of Illinois
Department of Human Services
**THE EMERGENCY FOOD ASSISTANCE PROGRAM -
CIVIL RIGHTS AND DISCRIMINATION COMPLAINT FORM**

This form must be completed to alert the IDHS EFP Manager of any potential Civil Rights and Discrimination complaints that may or may not be "officially" filed by the customer. It is a precautionary step and a record of the event(s) that took place during a TEFAP distribution time frame. Email the completed form to DHS.IEFP@illinois.gov. In order for the customer to file an "official" complaint, the customer must complete the USDA Program Discrimination Complaint (AD-3027) Form found online at http://www.ascr.usda.gov/complaint_filing_cust.html or call (866) 632-9992. The USDA Program Discrimination Complaint (AD-3027) Form can be mailed, faxed, or e-mailed per instructions.

Person filing complaint:		Date:
Mailing Address (include City, Zip Code):		
E-mail Address:	Telephone (include Area Code):	
Name of Site:		
Site Address (include City):		
Distribution Date:	Distribution Time:	
Details of Complaint:		
Complaint taken by:	Date complaint taken:	Time complaint taken:
Name of Foodbank Staff or DHS Emergency Food Program Manager Contacted:		Date:
Details of resolution of complaint:		

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

IL44-4530 (R-08-17) The Emergency Food Assistance Program - Civil Rights and Discrimination Complaint Form Page 1 of 1
Printed by Authority of the State of Illinois -0- Copies

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Action items



Routine CR reviews

Routine civil rights reviews assess partner compliance with civil rights laws. Here is a sample of some routine questions a site inspector may ask:

- Do printed materials and websites contain the non-discrimination statement?
- How are applicants and participants advised of their right to file a Civil Rights complaint of discrimination?
- Are reasonable modifications and auxiliary aids and services appropriately made for people with disabilities?
- Are reasonable steps taken to ensure meaningful access for persons with limited English proficiency?

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Questions?

Please follow the link provided to our [action items document](#). You'll find:

- Links to resources
- How-to instructions
- Contact information—get your questions answered!

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Congratulations!

You've completed civil rights training. Please follow the [course completion link](#) and complete the form.

We appreciate your dedication to our shared mission, and to maintaining a respectful service environment. Thank you!