



*TEFAP and CSFP*  
**CIVIL RIGHTS**  
*course*

The St. Louis Area Foodbank is an equal opportunity provider.

## Welcome



Welcome to the St. Louis Area Foodbank's civil rights and nondiscrimination course.

Whether you're a partner operating in Missouri or Illinois, distributing TEFAP or CSFP products, your contract includes upholding USDA civil rights policy. This course was designed for all SLAFB's partners who provide USDA products to neighbors.

Thank you for joining us!

# CIVIL RIGHTS

## *Introduction*

# Why train?

The Food and Nutrition Service (FNS) sets civil rights rules for TEFAP and CSFP. Training gives us a chance to explain some policy language that can be a little confusing sometimes.

FNS Instruction 113-1 defines **discrimination** as: “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**.”

Age is a “protected base” under the FNS definition. Eligibility for some USDA programs is based on age. For example, we often hear CSFP called the “senior box” program, because only low-income adults age 60 and older are eligible.

Eligibility for TEFAP is not based on age. TEFAP households include neighbors of all ages. Denying TEFAP product to neighbors under age 60 would be discrimination based on age.

## Protected classes

Protected bases, also called protected classes, are defined by law. The list of legally protected classes changes over time. This results in slightly different lists coexisting in printed materials. For example, the list of protected bases described in FNS Instruction 113-1 is older and different from what the public sees in the USDA's *Nondiscrimination Statement*.

### ***FNS Instruction 113-1***

Protected classes:

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

### ***Nondiscrimination Statement***

Protected classes:

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

# CIVIL RIGHTS

## *Introduction*

# What to do?

We provided an example of age-based discrimination. Age has been a protected class for a long time. Newer protected classes might be less familiar. If someone raises a complaint based on a protected class you've never heard of... What to do?

Don't turn them away. There's a common-sense approach to helping identify, prevent, or document discrimination. Start where they are. Refer to the communication all our neighbors have access to: the *And Justice for All* poster, or the *Nondiscrimination Statement* online.

If you still 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—improving access to food for neighbors—is important enough to take action.

# CIVIL RIGHTS

## *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

# CIVIL RIGHTS

## *Introduction*

# Action items

Because the FNS requires that we take specific actions to protect our TEFAP and CSFP neighbors, we'll conclude our training with action items, a practical takeaway document with links to resources we'll talk about during this course.

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

More about that as we go!

# **CIVIL RIGHTS**

Effective public  
notification systems



# CIVIL RIGHTS

## *Effective public notification systems*

# 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.

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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# Program information

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.



In addition to websites, we use all kinds of communications to get the word out about when we're open to neighbors. The main rule is 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 your state's TEFAP and CSFP courses.

## Poster

The FNS requires us to prominently display the *And Justice for All* poster in plain view at TEFAP and CSFP sites. The poster content is the *Nondiscrimination Statement*. Apart from program availability, the poster covers the written requirements of public notification:

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

For Illinois and Missouri, the correct version to display at both TEFAP and CSFP sites is AD-475A, shown here. The federal government provides the states with the posters, and the states distribute them to the food banks. If you're missing a poster at your location, please contact your Partner Relationship Coordinator.



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notification  
systems*

## Images & statement

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.

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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notification  
systems*

## Next steps

Public notification is a big topic. There are variations in how to handle public notification from program to program, and from state to state. You'll learn more specific requirements when you take the CSFP or TEFAP course for your state—like civil rights, taking a USDA program course is an annual training requirement.

# **CIVIL RIGHTS**

## Customer service

# CIVIL RIGHTS

## *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 service contracts.

Displaying courtesy and respect in words and actions includes maintaining transparency, and consistently following the rules provided by the USDA and our state to operate TEFAP or CSFP.

By providing neighbors a consistent experience within each location, from within each food bank service area, and within each state, we hope to build and maintain trust.

# CIVIL RIGHTS

## *Customer service*

# Resolving issues

The state of Illinois adds these considerations when issues come up:

- 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
- Practice empathy when resolving conflict

Most issues are resolved informally by addressing customer service concerns directly in the moment.

Less often, issues are more severe, or continue over multiple incidents. We'll talk about managing conflict and how to submit a civil rights complaint later in the course.



# **CIVIL RIGHTS**

Data collection and use

# CIVIL RIGHTS

## *Data collection and use*

# Who collects data?

**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.

The FNS exempts some programs from this requirement.

TEFAP is exempt. We aren't required to ask TEFAP neighbors about their race or ethnicity for the FNS.

CSFP neighbors may decline to self-identify—that's their choice. While we're required to ask, CSFP neighbors aren't required to provide information about their race or ethnicity. This information isn't necessary to determine CSFP eligibility.

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## *Data collection and use*

# Data we collect

During the neighbor intake process, CSFP partners ask neighbors two questions. 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*

The same options are provided by each state in accordance with federal law.

# CIVIL RIGHTS

## *Data collection and use*

# Why we collect data

The FNS collects CSFP neighbor data to prevent discrimination. They use the data to assess program success and make decisions. They'll compare the combined results with demographic data to determine how effective CSFP outreach was. Then they'll identify areas where additional outreach is needed, and select some locations for compliance reviews.

Because race and ethnicity questions deal directly with protected classes, the positive intent behind the questions can become a negative experience. Imagine if CSFP neighbors were asked these questions at some locations and not at others, or by some individuals but not by others. To maintain trust, it's important to be consistent about applying government rules at neighbor intake. For more specific information about this topic, be sure to take the annual CSFP compliance course.

# CIVIL RIGHTS

## *Data collection and use*

# Data lifecycle

We care for race and ethnicity data by maintaining record-keeping systems according to federal law. The CSFP data lifecycle requires partners to:

- Store data for four years (three past 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

Partners collect, use, and protect neighbors' personal information that may go beyond civil rights. Do you have any questions about handling civil rights data, or any other data? We'd like to hear from you if you'd like more assistance with data security.

# **CIVIL RIGHTS**

Requirements for  
reasonable  
accommodation of  
persons with  
disabilities

# CIVIL RIGHTS

*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 cover physical accommodations and communication modifications to ensure neighbor access to TEFAP and CSFP.

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disabilities*

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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's included in *major life activities* so more people could gain needed access.

**Major life activities** are 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.

Source: US EEOC Questions and Answers on the Final Rule Implementing the ADA Amendments Act of 2008.



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## 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.

Thanks to the ADA (Americans with Disabilities Act), most public buildings and facilities incorporate physical accessibility for neighbors in wheelchairs and other power-driven mobility devices. Physical accessibility also applies to our neighbors' service animals.

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# 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, verbal assistance, or audio recordings for persons with low vision.

As programs and offices modernize, we've begun to learn more about making reasonable modifications to websites and online application systems. The USDA provides free communication and digital accessibility resources to help raise awareness and provide practical support.

# **CIVIL RIGHTS**

## Requirements for language assistance

# CIVIL RIGHTS

## *Requirements for language assistance*

# LEP resources

The civil rights goal for language assistance is to prevent discrimination based on national origin. The USDA refers 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.

The USDA supplies free LEP resources to assist with identifying languages. In addition, the USDA provides program information, materials, and services in languages partners have identified. Your state also provides documents neighbors need in languages partners have identified. We'll share these resources with you at the end of this course.

# **CIVIL RIGHTS**

## Conflict resolution

# CIVIL RIGHTS

## *Conflict resolution*

# Preventing conflict

One way that SLAFB 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.

We also agreed to work together to create an atmosphere that does not hinder partnership, kindness, concern, fairness, or appreciation. We'll resolve differences together in an appropriate manner through transparent and purposeful communication and without the use of offensive, abusive, or disrespectful language or actions.

# CIVIL RIGHTS

## *Conflict resolution*

# Managing conflict

The state of Missouri encourages applying **conflict resolution** to 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.

The state of Illinois says that key components for successful conflict resolution are:

- Controlling our own emotional responses
- Seeking to understand the opposing point of view
- Identifying needs and common interests
- Seeking mutual benefits or purpose

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## *Conflict resolution*

# Resolution process

The state of Illinois recommends this general process for constructive conflict resolution:

- Define the problem, issue, or 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

Applying the key components and conflict resolution process takes practice. Sometimes engaging support or a mediator is the most constructive way forward. Reach out to your Partner Relationship Coordinators to leverage their experience, resources, and food bank network.



# **CIVIL RIGHTS**

## Complaint procedures

# CIVIL RIGHTS

## *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.

The FNS requires assurances in our contracts to distribute USDA food that we'll report civil rights discrimination complaints.

Our role is to identify and report complaints—we don't determine if discrimination took place.

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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 how to report 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. If someone suspects that a neighbor is unsatisfied with the services at a distribution site, consider whether the incident involves a protected class.

This is the main reason why adding the *Nondiscrimination Statement* to our program materials is so important. The statement provides a list of protected classes, LEP and accommodation information, and reporting instructions for filing formal CRD complaints with the USDA.

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## *Complaint procedures*

# USDA form

The most direct way to file a CRD complaint about a USDA program is to follow the instructions provided in the *Nondiscrimination Statement*. If you help a neighbor, volunteer, or staff member complete a CRD complaint form, 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.

Each part of the form will help the USDA pursue an investigation and resolve the complaint. On the other hand, providing personal information or identifying details may not help the people involved feel safe or comfortable. If that means submitting a complaint without all the requested information, that's OK. There's no requirement to fill in a form to submit a complaint—the USDA and other agencies will accept information submitted in any format.

# CIVIL RIGHTS

## *Complaint procedures*

# Documenting

If the person or people concerned decide not to file a CRD complaint with the USDA, we should still document what took place. If you don't want to use a form, we recommend having one nearby to refer to. The USDA complaint form and the Illinois TEFAP complaint form are guides to the kind of information we should collect.

If this situation comes up for you, maintain confidentiality—this is extremely important. Collect as much information as possible about the discriminatory event by filling in or following the general outline provided by these forms. These forms are both available in several languages—the Illinois form may be useful in Missouri or for CSFP participants.

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.

## 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 might slow down someone's ability to express their concerns.

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

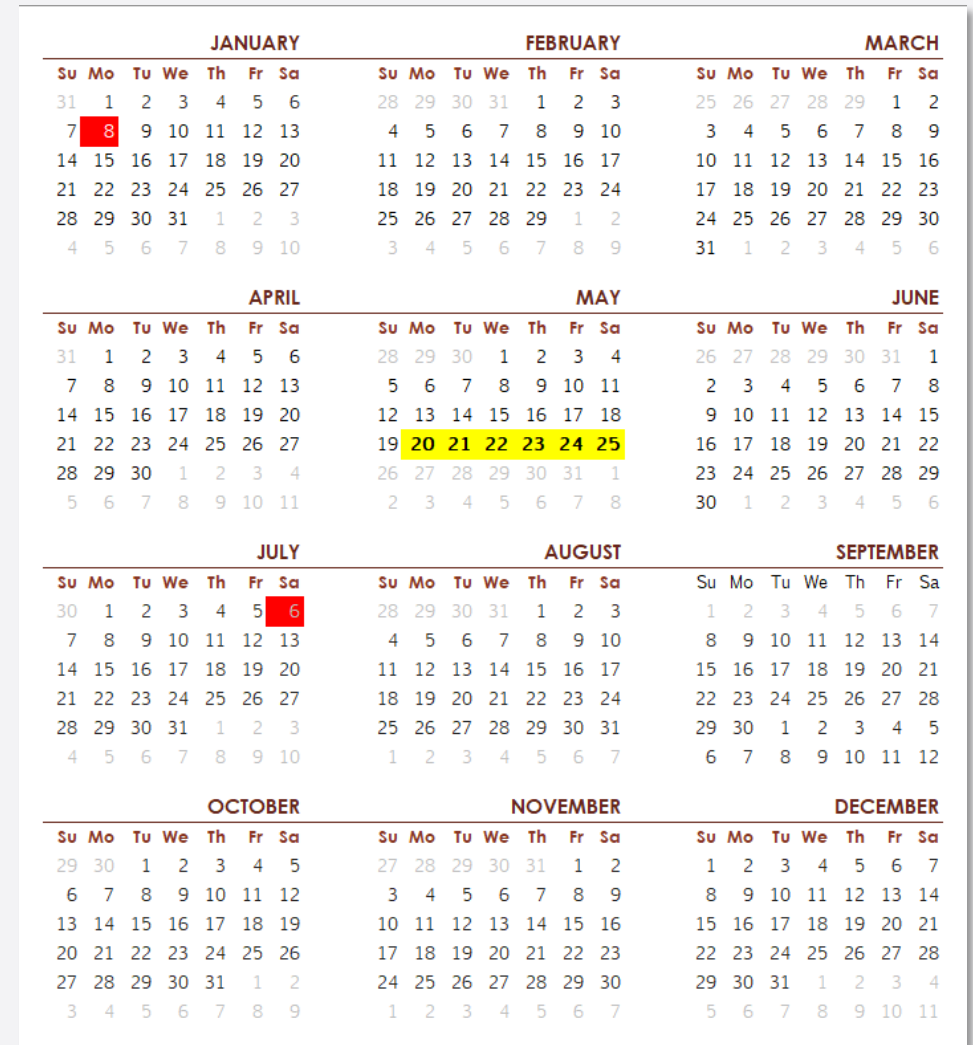


## Date of the report

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.

Example: On May 20, we learn about an event that took place on January 8. We need to report by May 25.



# CIVIL RIGHTS

## *Complaint procedures*

# Submitting to SLAFB

Once you have what you need, submit documentation by phone, fax, email, or delivering a report on paper. Choose the way that is easiest and most comfortable—for example, it may be difficult to attach a form to an email message sent from a cell phone. If typing a complaint into an email message without sending a form is easier, do that.

If the people involved are not interested in filing a formal complaint with the USDA, documentation should be submitted to the state or to SLAFB. Partners and neighbors may find it easiest to work with SLAFB staff because of long-standing relationships in the community. What happens next?

Documentation sent to SLAFB is logged for the state. SLAFB logs CRD complaints separately from other program complaints. Then, SLAFB informs the appropriate state agency for your location and program.



# CIVIL RIGHTS

## *Complaint procedures*

# Submitting to state

Partners and neighbors can submit documentation to state agencies directly. Unless the complainant is anonymous, appropriately submitted documentation should result in follow up from the state.

Whether states obtain documentation from SLAFB, from partners, or from neighbors, they're obliged to inform complainants of their option to file a CRD complaint with the USDA. The state won't pass the complaint on to the USDA—that decision remains in the hands of the complainant.

After submitting documentation locally or at the state level, the people concerned may change their minds and decide to file a formal complaint with the USDA. The documentation submitted earlier will be very helpful for them.

# **CIVIL RIGHTS**

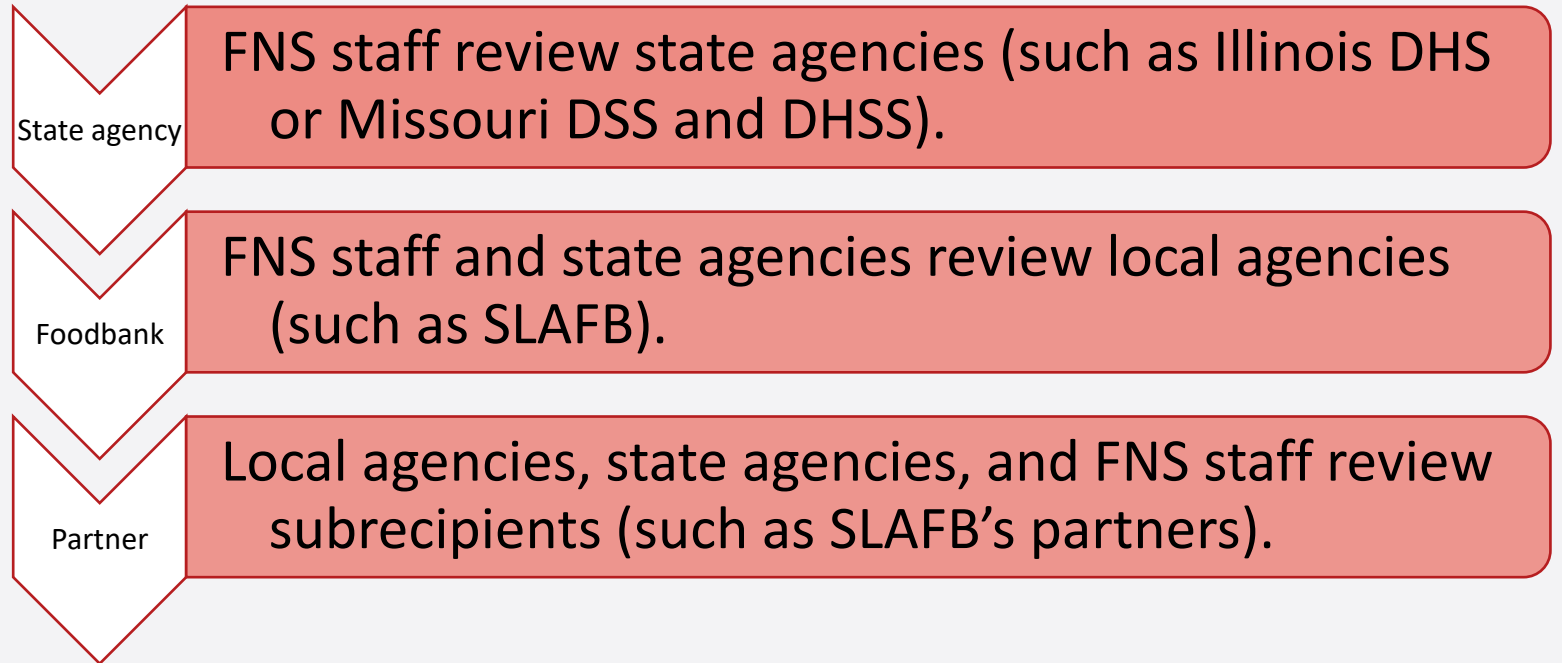
## Compliance review techniques

# CIVIL RIGHTS

*Compliance  
review  
techniques*

# Reviewers

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



# CIVIL RIGHTS

## *Compliance review techniques*

# Review types

There are three types of compliance reviews:

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

**Pre-award** reviews are for partners applying to distribute USDA products.

Those of us taking this course distribute TEFAP and CSFP food—the pre-award review took place already, when the state reviewed the initial application to participate in a USDA program.

We have **post-award** status, meaning as a condition to distribute USDA food, we've already contractually agreed to uphold civil rights rules and regulations.

# CIVIL RIGHTS

## *Compliance review techniques*

# Routine reviews

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

The reviewer visits partner locations where neighbors are being served and asks the staff and volunteers questions to assess civil rights compliance areas. We'll talk more about these questions a little later.

Sometimes reviewers *find* that the partner 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 partner and to the FNS.

# CIVIL RIGHTS

## *Compliance review techniques*

# 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.

Special reviews are never routine. A special review may occur for several reasons, such as:

- 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

Any review may be scheduled with partners ahead of time or occur unannounced.

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*Compliance  
review  
techniques*

## Preparation

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

SLAFB provides review practice during site visits. Partner Relationship Coordinators walk partners through a site inspection checklist similar to ones used by state site inspectors to assess program compliance.

Program compliance includes civil rights, so participating in program training for CSFP or TEFAP in your state will also help you prepare.

# **CIVIL RIGHTS**

## Resolution of noncompliance



# CIVIL RIGHTS

## *Resolution of noncompliance*

# Noncompliance

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

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

When a written report with findings is issued, 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.

# **CIVIL RIGHTS**

Action items

# CIVIL RIGHTS

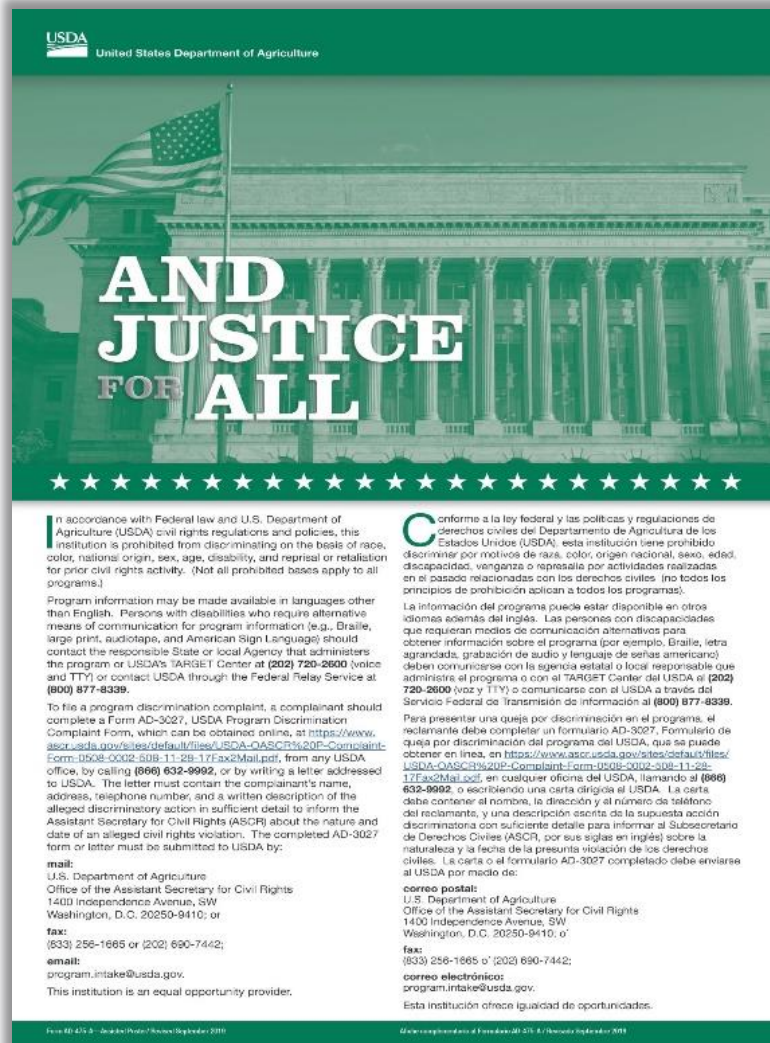
## *Action items*

# Civil rights at work



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

Then, we'll link you to our action items document—a collection of contact information, resources, processes and procedures. You can download and save or print as needed.



## Public notification

The *And Justice for All* poster must be prominently displayed anywhere TEFAP and CSFP food is distributed. SLAFB can help partners replace missing, damaged, outdated, or incorrect versions.

# CIVIL RIGHTS

## Action items



# 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					
<b>ETHNIC AND RACIAL DATA (OPTIONAL) MARK YOUR RACE (SELECT ONE OR MORE)</b>					
ARE YOU OF HISPANIC OR LATINO ORIGIN?	<b>American Indian or Alaskan Native</b>	<b>Asian</b>	<b>Black or African American</b>	<b>Native Hawaiian or Other Pacific Islander</b>	<b>White</b>
<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>BEFORE SIGNING, BE AWARE OF YOUR RIGHTS AND WHAT YOUR SIGNATURE MEANS:</b>					
...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 Klao Win. (Kru)                           |
| <input type="checkbox"/> አማርኛ ቋንቋ (Amharic)                            | <input type="checkbox"/> ຂົງພາຍເຈົ້າເວົ້າພາສາລາວ. (Lao)                    |
| <input type="checkbox"/> أنا أتتكلم 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"/> ဝေဠုန်စကားပြောနိုင်ပါသည်။ (Burmese)           | <input type="checkbox"/> ਇ ਮੁਖੇਅਚ 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 الصومالية (لغوي سوداني) (Sudanese)          |
| <input type="checkbox"/> ગુજરાતી બોલું છું (Gujarati)                  | <input type="checkbox"/> Marunong po akong magsalita ng Tagalog. (Tagalog) |
| <input type="checkbox"/> Mwen pale Kreyòl. (Haitian Creole)            | <input type="checkbox"/> ประเทศไทยพูดภาษาไทย (Thai)                        |
| <input type="checkbox"/> मैं हिन्दी बोलता हूँ (Hindi)                  | <input type="checkbox"/> ᱵᱟ ᱦᱚᱱᱚᱛ ᱵᱤᱨᱫᱟ ᱚᱜᱚᱸᱰ. (Tigrinya)                  |
| <input type="checkbox"/> Kuv hais lus hmoob. (Hmong)                   | <input type="checkbox"/> Я розмовляю українською. (Ukrainian)              |
| <input type="checkbox"/> Ana m 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 langwjjij (Jamaican Creole) | <input type="checkbox"/> Mo gbo Yoruba (Yoruba)                            |
| <input type="checkbox"/> ខ្ញុំនិយាយភាសាខ្មែរ (Khmer)                   |  |
| <input type="checkbox"/> 본인의 모국어는 한국어입니다 (Korean)                      |  |
| <input type="checkbox"/> نه ز زماني كوردی دو تاخلم. (Kurdish)          |  |

## “I speak...”

This is the USDA’s *I Speak Statements* card, 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 complaint form for Illinois CSFP, Missouri TEFAP, or Missouri CSFP.

Because this form is translated into languages used within SLAFB's service area, it may be useful for neighbors in CSFP or Missouri programs. Use it to collect information. If you're not participating in Illinois TEFAP, the contact information on the form will not apply. Be sure to submit it to SLAFB, the appropriate state agency, or the USDA.

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](mailto: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](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.

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# CIVIL RIGHTS

## *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 Nondiscrimination 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?



# CIVIL RIGHTS

## *Action items*



# Questions?

Please follow the link provided on the course webpage to our action items document. You'll find:

- Links to resources we talked about
- How-to instructions
- A full list of civil rights compliance questions reviewers may ask
- Contact information—get your questions answered!

# CIVIL RIGHTS

*Action items*



Foodbank®  
*St. Louis Area Foodbank*

# Congratulations!

Congratulations!

You've completed civil rights training. Please follow the course completion link on the course webpage and complete the form.

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

This course was brought to you by an AmeriCorps service member.