

in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens.

- Furnish appropriate auxiliary aids and services where necessary to afford individuals with disabilities, including applicants, participants, companions, and members of the public, an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity of Ramsey County, as contemplated in 28 C.F.R. § 35.160.

Physical access includes:

- Parking designated for people with disabilities as described in 36 C.F.R. Pt. 1191, App. B and App. D.
- Each facility or part of a facility constructed by, or on behalf of, or for the use of a public entity shall be designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by individuals with disabilities, if the construction was commenced after January 26, 1992, unless full compliance is structurally impracticable as contemplated by 28 C.F.R. § 35.151.

Reasonable Modifications to Policies, Procedures or Practices

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

Effective Communication and Auxiliary Aids and Services

Ramsey County will take appropriate steps to ensure that communications with people with disabilities and companions with disabilities are as effective as communications with others. Ramsey County will provide appropriate auxiliary aids and services, including accessible formats, so that individuals with disabilities can receive services, programs and benefits and participate in them in the same way as people without disabilities.

To determine what types of auxiliary aids or services are necessary, Ramsey County will give primary consideration to the requests of people with disabilities as contemplated by 28 C.F.R. § 35.160.

**RAMSEY COUNTY
HEALTH AND WELLNESS ADMINISTRATIVE
DIVISION, RAMSEY COUNTY FINANCIAL
ASSISTANCE SERVICES DEPARTMENT, RAMSEY
COUNTY SOCIAL SERVICES DEPARTMENT**

**PLAN FOR THE PROVISION OF SERVICES
TO
PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)**

Agency Commitment:

The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and the Ramsey County Social Services Department is committed to the goal of providing full and equal access for all our services to persons with limited English proficiency through the provision of effective language services, oral and written, at no charge.

I. INTRODUCTION

The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department recognizes its legal obligation to be in compliance with Title VI of the Civil Rights Act of 1964 that prohibits discrimination for any of its services on the basis of National Origin as evidenced by limited English proficiency. The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department also recognizes its responsibility to serve fairly and equally all eligible residents of Ramsey County.

Since the mid-1970s, refugee resettlement and other immigration to Ramsey County has fueled a dramatic change in the human face of our County. Dominated for the past century by Scandinavian and other Western European immigrants and their descendants, Ramsey County has been a welcoming home for the past 30 years to tens of thousands of new Americans from Southeast Asia, Africa, the former Soviet Union, and the Spanish-speaking countries of Central and South America and the Caribbean.

We have seen this growing diversity reflected in a new economic and cultural dynamism throughout our County. We have also witnessed the very real and painful struggle on the part of some to adapt to a new culture and marketplace. This transition is often made much more difficult because of poverty and isolation, which is, in part, due to the struggle to cope with a lack of English language skills. In turn, the poverty and isolation experienced by some of our LEP residents greatly increases the need for timely and effective human services.

The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department has been developing and expanding capacity to deliver services to a growing and diversifying population with limited English proficiency (LEP). **Our goal is the elimination of disparity in the delivery of, and access to, all our services for people who cannot take full advantage of those services without language assistance, both verbal and written.** Achievement of this goal will require a long-term commitment to develop our capacity to ensure fair and equal access to services and information.

This plan should be considered a work in progress. We will continue to seek out additional methods of providing language assistance as our population continues to change and diversify. This constant dynamic creates both opportunities and challenges that will need to be addressed as we continually modify and improve this plan.

Serving the language needs of the LEP population in Ramsey County is a challenge far broader than improving services provided by the County. Cities, schools, hospitals, businesses, and non-profit organizations all have a stake in effectively reaching and communicating with residents in our County that do not speak English well. Fulfillment of the full intent of Title VI will require solutions that are innovative and community - wide. We intend to explore, with community partners, opportunities to utilize the potent blend of technology and language diversity in our community to forge creative ways of making language assistance available more broadly and effectively.

II. Legal Authorities/References

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

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

III. Department Contact

Karen Saltis, the Director of Administration at 651-266-4324, is the Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department representative responsible for monitoring the implementation of this Plan and its compliance with Title VI of the Civil Rights Act of 1964 and the policy guidance issued by the U.S. Department of Health and Human Services Office of Civil Rights in Vol.65, No. 169 of the Federal Register, dated Wednesday, August 30, 2000. The Department contact will also be responsible for handling client/applicant complaints related to this Plan.

IV. Language Needs Assessment:

The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and the Ramsey County Social Services Department has made an assessment of the language needs of the people residing in Ramsey County. This assessment was developed from several sources, including:

- Reports of country of origin and primary language (when available) collected from the combined application form for all foreign-born applicants and recipients of public cash and medical assistance.
 - MAXIS data from the state.
 - School enrollment data from the school districts in Ramsey County.
 - Enrollment data for LEP students in the St. Paul Adult Learners program at the Hubbs Center for Lifelong Learning.
 - Refugee arrival data from the Minnesota Department of Health.
- Data collected for all Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department interpreter contacts over the past three years.
- Results from a survey of 36 refugee and immigrant service providers serving LEP residents of Ramsey County.

Table 1. Assessment of Language Needs in Ramsey County (effective Jan. 2012)

Language	Population	Estimated % who are LEP	Estimated # who are LEP
Hmong	51,000	25%	12,750
Burmese/Karen	8,500	75%	6,375
Spanish	38,000	10%	3,800
Somali	6,900	30%	2,700
Vietnamese	3,800	15%	370
Oromo	2,000	25%	500
Amharic	1,500	20%	300
Khmer	2,900	10%	290
Russian	2,800	10%	280
Arabic	700	30%	210
Tigrinya	800	20%	160
French	325	20%	65
Laotian	300	15%	45
Tagalog	80	10%	8

The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department recognizes that this assessment represents our best estimates for the point in time for which the data is collected. The language assessment will be an on-going process to identify both short and long-term trends.

V. Notification of the Availability of Language Assistance:

The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department has signs in Hmong, Spanish, Somali, Oromo, and Karen in several locations in our primary service location at 160 E. Kellogg Blvd. our Mental Health Center at 1919 University Ave. and our additional office location at 450 N. Syndicate. These signs inform limited English proficient human services applicants and recipients that language assistance is available to them on request at no cost.

The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department routinely includes a language block on important documents that have not been translated. The language block informs people that the letter contains important information and that they should get help in reading it and contains the notification that language assistance is available from the Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department at no cost.

VI. Determining that Language Assistance is Required:

Determining that language assistance is required could be made in a number of ways:

- Limited English proficient applicants and recipients can indicate their need for language assistance by pointing to their language on a 12sided pop-up dome located at any reception or information/help desk in the Department. The pop-up dome says “I need a [specific language] interpreter” in Hmong, Spanish, Khmer, Russian, Korean, Vietnamese, Arabic, Lao, Somali, Mandarin, Cantonese, and Amharic.
- The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department staff person reviews the language preference questions on the application forms, such as HCAPP, CAF I, and Recertification Form, or any social services application or case review form. [County-produced application and review forms will be updated to include language preference information].
- The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department staff person asks, whenever there is a question, if the persons would like oral or written language assistance, repeating the message that it is the person’s right to have language assistance provided, if desired, at no cost.

VII. Provision of Spoken Language Assistance:

The preferred method of service delivery for all clients and applicants is by appointment. However, we recognize that our clients and applicants for services may have urgent needs

or issues requiring immediate attention. When situations arise that make scheduling appointments impractical, arrangements are made for an expedited response. The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department will make a good faith effort to provide an equivalent capacity for expedited response for LEP clients and applicants based on the same determination of need as applies to English speaking persons.

When an LEP person requires an expedited response, the Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department staff person identifying that need will utilize a flexible menu of language service options to ensure that there is timely and appropriate response. What method of language assistance is most appropriate is a case-by-case determination based on a variety of factors, including availability, degree of complexity of issue, client preference, etc. In general, however, options, in order of preference, include:

- Bilingual staff from the service area that is required
- On-site interpreter
- Community Interpreter Agency – either face to face or by phone
- Bilingual staff from another service area
- AT&T Language Line
- Bilingual Volunteer from the community

The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department provides a flexible menu of language assistance services. Use of a family member or friend as an interpreter will be allowed only if it is clearly the wish of the applicant/client and the person designated can demonstrate competence to serve as an interpreter. Minor children will not be used as interpreters except in cases of emergency when **no alternative** is available. Emergency, for purposes of qualifying for this exception to using minor children as interpreters, is defined as a situation requiring **immediate** intervention to prevent, stop, or ameliorate serious emotional or physical harm.

- **Bilingual Professional Staff:** The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department maintains language/cultural specific hiring lists to ensure that we continue to have the capacity to hire professional service staff who can speak and relate to Ramsey County's diverse clients.

Whenever feasible, without unduly delaying services or introducing confidentiality issues, LEP applicants/clients will be assigned to bilingual staff who are competent to deliver services in the applicant/client's native language. While this method of service delivery is generally the preferred option, we are cognizant that it is not without potential difficulties as well. Some bilingual professional staff have reported extreme stress related to serving a caseload

exclusively or predominantly from their own cultural community. Expectations that the worker is in a position to make decisions to the benefit of the individual or family can create animosity when the result is otherwise. Therefore, even if, from a perspective of efficiency and accuracy of communication, receiving services from bilingual professional staff may be preferable, it remains only one option in a more diversified menu of options.

- **On-Site Interpreters:** The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department currently maintains a contract with Arch Language Network for the equivalent of 8 full time interpreters broken out as follows:
 - Hmong/Lao/Thai 2.5 FTE
 - Spanish 1.5 FTE
 - Somali 1.5 FTE
 - Karen 2 FTE
 - Interpretive Srv Scheduler 0.5 FTE

These interpreters are located on site at 160 E. Kellogg Blvd. and are available for appointments or emergency assistance.

These interpreters, because they are on site in our primary service location, provide the Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department and our LEP clients and applicants with a flexibility to respond through scheduled appointments, phone contacts and appointment setting, and emergency response.

- **Community Language Banks:** The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department maintains contracts with nine community-based organizations that agree to provide oral and written language assistance in more than 100 languages upon demand (generally within three hours but with a promise to make every effort to have someone available within one hour). These interpreters are available primarily by appointment.
- **The Language Line Arch Network telephone interpretation on demand:** The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department also accesses, as needed, telephone interpretation and appointments scheduling service provided by The Language Line and Dialog One. The companies provide nearly instantaneous connection with interpreters in 140 languages for a by-the-minute fee. This service is used primarily for short-term crisis services and other unscheduled but critical needs.

VIII. Written Language Assistance:

When available through the Minnesota Department of Human Services, the Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department will utilize translated documents related to application and eligibility information.

The languages that are currently the most common non-English languages in Ramsey County are: ■ Hmong

- Karen/Burmese
- Spanish
- Somali

When translated forms are available, the LEP service recipient will be provided the option of receiving the form in English or the translated version. Once this decision has been made and documented, the client will be sent forms in that language (if available).

IX. Language Assistance Competency Assurance:

The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department requires Arch Language Network to test and verify the competence of interpreters provided through our contract for an in-house team of interpreters at our Human Services offices.

The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department Coordinator of Interpreter Services responds to any complaints from staff over the competence of interpreters from contracted agencies. Details of the complaint are sent to the agency and, depending on the severity of the complaint, the interpreter in question can be banned from working on site, or can be required to demonstrate competence before allowed to be an on-call interpreter for the Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department.

X. Staff Training:

The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department training plan consists of three components:

- 1. Awareness of the LEP Plan including its purpose and importance. At a monthly Leadership Meeting, all supervisors and managers will review the plan's essential elements including:**

- A. The Ramsey County Health and Wellness Administrative Division,

Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department legal obligation to be in compliance with Title VI of the Civil Rights Act of 1964

- B. Recent trends in language needs in Ramsey County
 - C. Client notification of the availability of language assistance
 - D. Summary of available language assistance services and means of accessing each
 - E. Staff training requirements
 - F. Complaint resolution procedures
2. **Supervisor Review:** Supervisors will review this information with their staff within 60 days. The “Special Policy” process will be utilized to monitor compliance.
3. **Staff Training**
- A. Staff will be updated annually on the general policies and procedures for requesting in-house interpreter services as outlined in the Administration Manual. The “Special Policy” process will be utilized to monitor compliance.
 - B. Staff are provided access to a video training on “*How to Work with Interpreters*” workshops designed by the Program in Translation and Interpreting at the University of Minnesota. New staff will view a video of this training as part of their new employee orientation.
 - C. Staff and interpreters will be provided a glossary of mental health and developmental disability terms translated into Hmong, Spanish, and Somali.

XI. Evaluation and Monitoring:

The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department will monitor its language assistance program at least annually to assess the current language needs in the County and whether existing assistance is meeting the needs of clients and applicants of Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department services. The 7 will assess staff awareness about the policies and procedures for accessing and effectively utilizing language assistance resources, and ensure that sources of and arrangements for assistance are still current and viable.

XII. Complaint Resolution Procedure:

It is the policy of the Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department to provide services to all persons without regard for limited English proficiency.

In order to assure compliance with this policy, including Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color or national origin, including those with limited English proficiency, a program participant, participant representative, applicant, or staff member who has reason to believe that she/he has been mistreated, denied services, or

discriminated against in any aspect of services or employment may file a grievance. In order to implement this policy, the Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department has adopted an internal grievance procedure, providing for prompt and equitable resolution of complaints alleging any action prohibited by U.S. Department of Health and Human Services Regulation (45 CFR, Part 80).

The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department will provide language assistance, free of charge, upon request, at any and all stages of the complaint resolution process.

For more information about the law and regulations contact:

Karen Saltis

**Ramsey County Health and Wellness Administrative Division
160 East Kellogg Blvd, Room 9200
St. Paul, MN 55101
Phone number (651) 266-4324**

Ms. Saltis has been designated to coordinate efforts of the Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and the Ramsey County Social Services Department to comply with the regulations.

Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and Ramsey County Social Services Department uses one complaint procedure. Please refer to page 5 for the complaint resolution procedure.

SNAP Civil Rights Training Section

USDA requires that county agencies conduct SNAP civil rights training on an annual basis. All staff who administer the SNAP program must attend training, as well as staff who come in direct contact with the public, such as support staff, supervisors and managers.

Ramsey County Financial Assistance Services Department provides the annual SNAP civil rights training using DHS's PowerPoint presentation. Training is provided online and is documented as to the date of the training and who attended.

MINNESOTA DEPARTMENT OF HUMAN SERVICES
CIVIL RIGHTS ASSURANCE AGREEMENT OF COMPLIANCE

NONDISCRIMINATION IN STATE AND FEDERALLY FINANCED PROGRAMS
RAMSEY COUNTY COMMUNITY HUMAN SERVICES
(HEREAFTER CALLED THE “COUNTY AGENCY”)

Ramsey County 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. Ramsey County agrees that compliance with this Assurance is a condition of continued receipt of federal financial assistance and that it is binding upon the County Agency directly or through contract, license, or other provider of services, as long as it receives federal or state financial assistance; and shall be submitted with the required Comprehensive Civil Rights Plan update.

THE COUNTY AGENCY ASSURES that it will comply with:

TITLE VI of the Civil Rights Act of 1964, as amended; Department of Health and Human Services, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons; Age Discrimination Act of 1975, 42 U.S.C. 6101, as amended; Section 504 of the Rehabilitation Act of 1973, as amended; Section 508 of the Rehabilitation Act of 1973, as amended; Title II of the Americans with Disabilities Act of 1990; Section 1557 of the Patient Protection and Affordable Care Act of 2010; Federal Block Grant Programs of the Omnibus Budget Reconciliation Act of 1981; as amended; Title IX of the Education Amendments of 1972, as amended; Family Violence Prevention and Services Act; Food Stamp Act of 1977, as amended, including the Nondiscrimination Compliance Requirements in the Food Stamp Program and the Bilingual Requirements in the Food Stamp Program; FNS Instruction 113-1, Civil Rights Compliance and Enforcement - Nutrition Programs and Activities, Food and Nutrition Service, U.S. Department of Agriculture (2005); and Interethnic Adoption Provisions of the Small Business Job Protection Act of 1996 (formerly Multiethnic Placement Act of 1994).

PURSUANT TO THE CIVIL RIGHTS PLAN for the Minnesota Department of Human Services, by accepting this Assurance, the County Agency agrees to allow access, by authorized personnel of the Minnesota Department of Human Services and the United States Departments of Health and Human Services and Agriculture, during normal working hours, to private and/or confidential data maintained by the County Agency (or other sub-recipient of federal financial assistance) to the extent necessary to conduct a full and complete investigation into any complaint of discrimination, including to compile data, maintain records and submit reports as required to determine compliance with the above mentioned laws, rules and regulations. The Minnesota Department of Human Services agrees to comply with all requirements of the Minnesota Government Data Practices Act (Minnesota Statutes, section 13.01 *et seq.*). No private and/or confidential data collected, maintained or used in the course of an investigation shall be disseminated except as authorized by statute, either during the period of the investigation or after it has been concluded. If there are any violations of this assurance, DHS shall have the right to

invoke fiscal sanctions or other legal remedies in accordance with Minnesota Statutes, section 256.017.

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

Date: _____

By: _____

Ryan O'Connor
Deputy County Manager
Health and Wellness Service Team

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.

Date: _____

By: _____

Ben Rosene
Assistant Ramsey County Attorney

Civil Rights Plan Administration

The comprehensive civil rights plan will be administered by following the steps outlined below:

- a. Posted the plan in all client waiting rooms in buildings where the Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and the Ramsey County Social Services Department provides services for availability of applicants, clients and members of the public. The plan is also posted in print/copy rooms where it is available to employees, volunteers and contractors.
- b. Posted on the Ramsey County internet site for applicants, clients and members of the public. It is also posted on the internal intranet site for employees, volunteers and contractors.
- c. Reviewed annually with ALL staff.
- d. For the benefit of applicants, clients, and members of the public, prominently post in the lobby a copy of the following documents:
 - 1) Equal opportunity in service delivery policy;
 - 2) Complaint resolution procedure; and 3)
 - Disability policies and procedures.
- e. Post DHS' ADA Brochure: *Do you have a disability?* (DHS-4133-ENG) in all client waiting rooms in buildings where the Community Human Services Department (CHS) provides services for availability of applicants, clients and members of the public. The DHS ADA Brochure: *Do you have a disability?* (DHS-4133-ENG) is also posted in print/copy rooms where it is available to employees, volunteers and contractors.
- f. Conduct annual SNAP civil rights training and document the date of the training and who attended.

Appendix

Attachment A Equal Opportunity in Service Delivery Policy

Attachment B Civil Rights Complaint Resolution Procedure

Attachment C Civil Rights Complaint Form

Attachment D County Human Services Complaint Notification Form

Attachment E DHS brochure: *Do you have a disability?* DHS-4133-ENG

Attachment A

**Ramsey County Health and Wellness Administrative Division,
Ramsey County Financial Assistance Services Department and
Ramsey County Social Services Department
Equal Opportunity in Service Delivery Policy**

It is the policy of the Ramsey County Health and Wellness Administrative Division, the Ramsey County Financial Assistance Services Department and the Ramsey County Social Services Department 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.

The Ramsey County Health and Wellness Administrative Division, Ramsey County Financial Assistance Services Department and the Ramsey County Social Services Department 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 affiliation, disability or public assistance status. Supplemental Nutritional Assistance Program (SNAP) applicants will not be discriminated against on the basis of race, sex, religious creed, national origin, or political affiliation. “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 Ramsey County’s full range of services, programs and benefits, including, but not limited to, access to information about services, eligibility determinations and intake, admission procedures and treatment. The policy applies to the agencies and providers receiving federal and state funds under contracts, licenses and other arrangements with Ramsey County. The Minnesota Human Rights Act also applies to the work of Ramsey County and those agencies carrying out the work of Ramsey County.

The person designated to coordinate compliance with the above policy including Section 504 of the Rehabilitation Act of 1973 (nondiscrimination against persons with disabilities) is Ameer Xiong who can be reached at Ameer.Xiong@co.ramsey.mn.us, or call 651-266-4113 (or use your preferred relay service).

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 and benefits. Ramsey County Community 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, , disability or public assistance status. If you are an applicant of the Supplemental Nutritional Assistance Program (SNAP), you have a right to file a civil rights complaint if you believe you have been discriminated against because of your race, sex, religious creed, national origin, or political affiliation. **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, MNCare, CHIP programs and insurance companies and state health insurance exchanges.

It is against the law for anyone who works for Ramsey County Community 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 in service delivery policy, complaint resolution procedure, and complaint form. Use the contact information below to file a complaint. For more information about the law and regulations, contact Marcie Jefferys, Executive Assistant, Room 9800, (651) 266-4114, Marcie.jefferys@co.ramsey.mn.us who has been designated to coordinate the efforts of Ramsey County Human Services Department to comply with the regulations.

Civil Rights Contact Person

Ramsey County Community Human Services

Karen Saltis

651-266-4324 (voice) or use your preferred relay service

651-266-4438 (fax)

Karen.a.saltis@co.ramsey.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.
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

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 or her designee will help you. (Attachment C)

3. The Civil Rights Contact or her designee shall conduct an investigation of the complaint, if it is a true civil rights complaint. The Civil Rights Contact or her designee shall issue a written decision to 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 Ramsey County Diversity Program Manager within 15 days of receiving the written decision. The Diversity Program Manager **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. If the complaint is still unresolved, the complainant will be advised of his/her right to file a 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)
1-800-368-1019 (toll free)
1-800-537-7697 (TTY)

(b) 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, , or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA. The USDA, its Agencies, offices, and employees, and institutions are prohibited from discriminating against

Supplemental Nutritional Assistance Program (SNAP) applicants based on race, sex, religious creed, national origin, or political affiliation.

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

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

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

Submit your completed form or letter to USDA by:

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

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

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

This institution is an equal opportunity provider.

6. The complainant will also be advised of his/her right to file a complaint **directly** with State Agencies:

(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
(651) 539-1100 (voice)
1-800-657-3704 (toll free)
711 or 1-800-627-3529 (MN Relay)

(b) The **Minnesota Department of Human Services** prohibits discrimination in its programs because of race, color, national origin, creed, religion, sexual orientation, public assistance status, age, disability, or sex, including sex 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
Tamara.earley@fns.usda.gov

Civil Rights Complaint Form: Discrimination in Service Delivery

Client/complainant information

CLIENT'S NAME			
CLIENT'S STREET ADDRESS	CITY	STATE	ZIP CODE
CLIENT'S TELEPHONE NUMBER	Name, address and telephone number of someone who will know how to reach you (optional)		

Information about discriminating department and/or parties

DEPARTMENT NAME AND/OR PERSON'S NAME	DEPARTMENT TELEPHONE NUMBER		
DEPARTMENT STREET ADDRESS	CITY	STATE	ZIP CODE

Information about discrimination (check as many as apply)

Race	Color	National origin	Sex	Creed	Religion	Political affiliation	Age
Disability	Public assistance status		Sexual orientation				

Details of discrimination

<p>Explain what happened to you, including the following points:</p> <ul style="list-style-type: none"> • Explain why you believe you were treated differently. • Explain how you were treated differently from other people. • Give the date(s) of the incident(s). • Give the name(s) of the people who were directly involved. • If there were any witnesses, give their name(s) and explain what information they can provide. <p>If you need more space, attach additional pages.</p>	
SIGNATURE	DATE

For accessible formats of this publication or assistance with additional equal access to Human Services, please contact Marcie Jefferys at marcie.jefferys@co.ramsey.mn.us or (651) 266-4114 (or use your preferred relay service).

**COUNTY HUMAN SERVICE AGENCY
COMPLAINT NOTIFICATION FORM
COMPLAINTS ALLEGING DISCRIMINATION IN SERVICE DELIVERY
(To be completed by Civil Rights Contact or her designee)**

AUTHORITY: U.S. Department of Agriculture, Food and Nutrition Service Instruction 113-1.

REQUIREMENT: County human service agencies must notify the Minnesota DHS Civil Rights Coordinator within 90 days of all service delivery discrimination complaints (i.e., civil rights complaints) filed against them (see bottom of Page 2 for contact information).

ACTION REQUIRED:

Complete this form and send it to the DHS Civil Rights Coordinator within 90 days of the date the complaint was filed.

1. Name, address, telephone number of complainant:

2. Name and address of county agency delivering the benefits, including names of any employees accused of wrongdoing:

3. Type of discrimination alleged:

COMPLAINT NOTIFICATION FORM (Continued)

4. Describe the alleged discrimination, including the dates it happened. Give names and contact information of any witnesses:

5. Give a summary of the investigation findings, including any corrective action ordered:

CONTACT INFORMATION:

DHS Civil Rights Coordinator
Minnesota Department of Human Services
Equal Opportunity and Access Division
P.O. Box 64997
St. Paul, MN 55164-0997
(651) 431-3034 (voice) or use your preferred relay service (651)
431-7444 (fax)
joann.daSilva@state.mn.us