



LAKE COUNTY HEALTH AND HUMAN SERVICES COMPREHENSIVE CIVIL RIGHTS PLAN

2016

Agency Name	Lake County Health and Human Services
Agency Address	616 Third Avenue Two Harbors, MN 55616-1518
Agency Phone and Fax Numbers	Main Telephone: 218-834-8400 Minnesota Relay: 711 or 800-627-3529 Fax: 218-834-8412
Civil Rights and Limited English Proficiency Plan Contact Person	Courtney Anderson, Financial Assistance Supervisor Email: Courtney.Anderson@co.lake.mn.us Telephone: 218-834-8400 Minnesota Relay: 711 or 800-627-3529 Fax: 218-834-8412
ADA/504 Coordinator	Director, Lake County Health and Human Services 616 Third Avenue Two Harbors, MN 55616 Main Telephone: 218-834-8400 Minnesota Relay: 711 or 800-627-3529 Fax: 218-834-8412
Agency Posting Locations for the Comprehensive Civil Rights Plan	<ul style="list-style-type: none"> • Lake County Service Center, Two Harbors and Silver Bay: Reception Area, Interview Rooms, Employee Bulletin Boards • Lake County Website

ADA ADVISORY: For accessible formats of this publication or assistance with additional equal access to human services, call 218-834-8400 or use the MN Relay at 711 or 800-627-3529.

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THE PURPOSE OF A CIVIL RIGHTS PLAN

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

LEGAL AUTHORITY

Federal

- Title VI of the Civil Rights Act of 1964 (race, color, national origin)
- Section 504 of the Rehabilitation Act of 1973 (disability)
- Section 508 Amendment of the Rehabilitation Act of 1973 (disability)
- Title II of the Americans with Disabilities Act of 1990; State and local government services (disability)
- Age Discrimination Act of 1975 (age)
- Community Service Assurance Provisions of the Hill-Burton Act (health facilities receiving Hill-Burton Funds)
- Section 1557 of the Patient Protection and Affordable Care Act (added sex discrimination in health care programs)
- Nondiscrimination Provisions of the Omnibus Budget Reconciliation Act of 1981 (Federal Block Grants):
 - Community Services Block Grant (race, color, national origin, sex) **Remaining block grants** (race, color, national origin, age, disability, sex, religion)
 - Social Services Block Grant
 - Maternal and Child Health Services Block Grant
 - Projects for Assistance in Transition from Homelessness Block Grant
 - Preventive Health and Health Services Block Grant
 - Community Mental Health Services Block Grant
 - Substance Abuse Prevention and Treatment Block Grant
- Title IX of the Education Amendments of 1972 (sex)
- Family Violence Prevention and Services Act (race, color, national origin, age, disability, sex, religion)
- Food Stamp Act of 1977 [As Amended Through P.L. 108-269, 2004]
- Nondiscrimination Compliance Requirements in the Food Stamp Program, Food and Nutrition Service, U.S. Department of Agriculture
- Bilingual Requirements in the Food Stamp Program, Food and Nutrition Service, U.S. Department of Agriculture
- FNS Instruction 113-1, Civil Rights Compliance and Enforcement – Nutrition Programs and Activities, Food and Nutrition Service, U.S. Department of Agriculture (2005)
- Equal Opportunity for Religious Organizations in USDA Regulation

State

- Minnesota Human Rights Act, Chapter 363A

LAKE COUNTY HEALTH AND HUMAN SERVICES EQUAL OPPORTUNITY POLICIES AND PROCEDURES INCLUDING EQUAL ACCESS FOR PEOPLE WITH DISABILITIES

It is the policy of Lake County Health and Human Services (Lake County) 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.

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

This policy covers Lake 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 Lake County. The Minnesota Human Rights Act also applies to the work of Lake County and those agencies carrying out the work of Lake County.

Program Accessibility Policy for People with Disabilities

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

To avoid disability discrimination, Lake County will:

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

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

Physical access includes:

- Convenient off-street parking designated specifically for people with disabilities.
- Curb cuts and ramps between parking areas and the Lake County Service Center building.
- Level access into the first floor of Lake County building with elevator access to all other floors.

Reasonable Modifications to Policies, Procedures or Practices

Lake County will make reasonable modifications to its policies, procedures or practices when necessary to avoid discrimination on the basis of disability, unless Lake 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

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

interpreters who convey information effectively, accurately and impartially using any necessary specialized vocabulary.

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

MINNESOTA DEPARTMENT OF HUMAN SERVICES
CIVIL RIGHTS ASSURANCE OF COMPLIANCE FOR COUNTY HUMAN SERVICE AGENCIES
(Nondiscrimination in State and Federally Financed Programs)

County Agency: Lake County Health and Human Services

ASSURANCE OF COMPLIANCE WITH TITLE VI OF THE CIVIL RIGHTS ACT OF 1964; SECTION 504 OF THE REHABILITATION ACT OF 1973; TITLE IX OF THE EDUCATION AMENDMENTS OF 1972; AGE DISCRIMINATION ACT OF 1975; CURRENT VERSION OF USDA'S FNS INSTRUCTION 113-1/CIVIL RIGHTS COMPLIANCE AND ENFORCEMENT, NUTRITION PROGRAMS AND ACTIVITIES FOOD AND NUTRITION SERVICE; ALL OTHER FEDERAL NONDISCRIMINATION LAWS, REGULATIONS, POLICIES, INSTRUCTIONS AND GUIDANCE; AND THE MINNESOTA HUMAN RIGHTS ACT

The County Agency provides this assurance in consideration of and for the purpose of obtaining Federal financial assistance from the U.S. Department of Agriculture (USDA) to operate the Supplemental Nutrition Assistance Program in Minnesota on behalf of the Minnesota Department of Human Services (DHS).

THE COUNTY AGENCY AGREES THAT IT WILL COMPLY WITH:

1. Title VI of the Civil Rights Act of 1964, 42 USC §2000d et seq., as amended, and all requirements imposed by or pursuant to the regulation at 7 CFR Part 15, Subpart A and Subpart C. In accordance with Title VI and the Regulation, no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity for which the County Agency receives Federal financial assistance from USDA/DHS.
2. Section 504 of the Rehabilitation act of 1973, 29 USC § 794, as amended, and all requirements imposed by or pursuant to the regulation at 7 CFR Part 15b. In accordance with Section 504 of that Act and the Regulation, no otherwise qualified individual with a disability in the United States shall, solely by reason of her/his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity for which the County Agency receives Federal financial assistance from USDA/DHS.
3. Title IX of the Education Amendments of 1972, 20 USC § 1681 et seq., as amended, and all requirements imposed by or pursuant to the regulation at 7 CFR Part 15a. In accordance with Title IX of that Act and the Regulation, no person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any education program or activity for which the County Agency receives Federal financial assistance from USDA/DHS.
4. Age Discrimination Act of 1975, 42 USC §§ 6101-6107, as amended and all requirements imposed by or pursuant to the regulation at 45 CFR Part 91. In accordance with the Age Discrimination Act and the Regulation, no person in the United States shall, on the basis of age, be denied the benefits of, be excluded from participation in, or be subjected to discrimination under any program or activity for which the County Agency receives Federal financial assistance from USDA/DHS.
5. Current version of USDA's FNS Instruction 113-1, Civil Rights Compliance and Enforcement – Nutrition Programs and Activities, Food and Nutrition Service, Issued November 8, 2005. The purpose of Instruction 113-1 is to establish and convey policy and provide guidance and direction to the USDA Food and Nutrition Service (FNS) and its recipients and customers and ensure compliance with and enforcement of the prohibition against

discrimination in all FNS nutrition programs and activities, whether federally funded in whole or not. FNS Instruction 113-1 incorporates the above Federal legal authorities.

6. Minnesota Human Rights Act found at Minnesota Statutes, Chapter 363A, specifically § 363A.11, Public Accommodations and § 363A.12, Public Services. In Minnesota, it is an unfair discriminatory practice to deny any person the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of a place of public accommodation because of race, color, creed, religion, disability, national origin, marital status, sexual orientation, or sex. Additionally, it is an unfair discriminatory practice to discriminate against any person in the access to, admission to, full utilization of or benefit from any public service because of race, color, creed, religion, national origin, disability, sex, sexual orientation, or status with regard to public assistance.

THE COUNTY AGENCY AGREES THAT BY ACCEPTING THIS ASSURANCE, it will compile data, maintain records, and submit reports, as required, to permit effective enforcement of the nondiscrimination laws and permit authorized USDA personnel and other authorized personnel, such as DHS personnel, during normal working hours to review such records, books, and accounts as needed to ascertain compliance with the nondiscrimination laws. If there are any violations of this assurance, USDA shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the County Agency and its successors, transferees, and assignees, as long as they receive Federal financial assistance or retain possession of any assistance from DHS/USDA.

THE COUNTY AGENCY AGREES THAT BY ACCEPTING THIS ASSURANCE, it will obtain a written statement of assurance from its SNAP-related contractors and vendors assuring that they will also operate in compliance with all of the stated nondiscrimination laws, regulations, instructions, policies, and guidance.

The person whose signature appears below is authorized to sign this assurance and commit the County Agency to the above provisions.

1/26/17

Date

Lisa Hanson

Name and Title of Authorized Official (please print)

Lisa Hanson

Signature of Authorized Official

Lake County Health and Human Services

Name of County Agency

616 3rd Ave, Two Harbors, MN 55616

Street Address, City, State, Zip Code

Please deliver Assurance to:

Civil Rights Coordinator

Minnesota Department of Human Services, Equal Opportunity and Access Division

P.O. Box 64997, St. Paul, MN 55164-0997

joann.dasilva@state.mn.us

MINNESOTA DEPARTMENT OF HUMAN SERVICES
CIVIL RIGHTS ASSURANCE OF COMPLIANCE FOR CONTRACTORS/VENDORS
(Nondiscrimination in State and Federally Financed Programs)

CONTRACTOR/VENDOR: Arrowhead Economic Opportunity Agency

ASSURANCE OF COMPLIANCE WITH TITLE VI OF THE CIVIL RIGHTS ACT OF 1964; SECTION 504 OF THE REHABILITATION ACT OF 1973; TITLE IX OF THE EDUCATION AMENDMENTS OF 1972; AGE DISCRIMINATION ACT OF 1975; CURRENT VERSION OF USDA'S FNS INSTRUCTION 113-1/CIVIL RIGHTS COMPLIANCE AND ENFORCEMENT, NUTRITION PROGRAMS AND ACTIVITIES FOOD AND NUTRITION SERVICE; ALL OTHER NONDISCRIMINATION LAWS, REGULATIONS, POLICIES, INSTRUCTIONS AND GUIDANCE; AND THE MINNESOTA HUMAN RIGHTS ACT

The Contractor/Vendor provides this assurance in consideration of and for the purpose of obtaining Federal financial assistance from the U.S. Department of Agriculture (USDA)/Minnesota Department of Human Services (DHS) to operate the Supplemental Nutrition Assistance Program (SNAP) in Minnesota.

THE CONTRACTOR/VENDOR AGREES THAT IT WILL COMPLY WITH:

1. Title VI of the Civil Rights Act of 1964, 42 USC §2000d et seq., as amended, and all requirements imposed by or pursuant to the regulation at 7 CFR Part 15, Subpart A and Subpart C. In accordance with Title VI and the Regulation, no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity for which the Contractor/Vendor receives Federal financial assistance.
2. Section 504 of the Rehabilitation act of 1973, 29 USC § 794, as amended, and all requirements imposed by or pursuant to the regulation at 7 CFR Part 15b. In accordance with Section 504 of that Act and the Regulation, no otherwise qualified individual with a disability in the United States shall, solely by reason of her/his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity for which the Contractor/Vendor receives Federal financial assistance.
3. Title IX of the Education Amendments of 1972, 20 USC § 1681 et seq., as amended, and all requirements imposed by or pursuant to the regulation at 7 CFR Part 15a. In accordance with Title IX of that Act and the Regulation, no person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any education program or activity for which the Contractor/Vendor receives Federal financial assistance.
4. Age Discrimination Act of 1975, 42 USC §§ 6101-6107, as amended and all requirements imposed by or pursuant to the regulation at 45 CFR Part 91. In accordance with the Age Discrimination Act and the Regulation, no person in the United States shall, on the basis of age, be denied the benefits of, be excluded from participation in, or be subjected to discrimination under any program or activity for which the Contractor/Vendor receives Federal financial assistance.
5. Current version of USDA's FNS Instruction 113-1, Civil Rights Compliance and Enforcement – Nutrition Programs and Activities, Food and Nutrition Service, issued November 8, 2005. The purpose of Instruction 113-1 is to establish and convey policy and provide guidance and direction to the USDA Food and Nutrition Service (FNS) and its recipients and customers and ensure compliance with and enforcement of the prohibition against discrimination in all FNS nutrition

programs and activities, whether federally funded in whole or not. FNS Instruction 113-1 incorporates the above Federal legal authorities.

6. Minnesota Human Rights Act found at Minnesota Statutes, Chapter 363A, specifically § 363A.11, Public Accommodations and § 363A.12, Public Services. In Minnesota, it is an unfair discriminatory practice to deny any person the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of a place of public accommodation because of race, color, creed, religion, disability, national origin, marital status, sexual orientation, or sex. Additionally, it is an unfair discriminatory practice to discriminate against any person in the access to, admission to, full utilization of or benefit from any public service because of race, color, creed, religion, national origin, disability, sex, sexual orientation, or status with regard to public assistance.

THE CONTRACTOR/VENDOR AGREES THAT BY ACCEPTING THIS ASSURANCE, it will compile data, maintain records, and submit reports, as required, to permit effective enforcement of the nondiscrimination laws and permit authorized USDA personnel and other authorized personnel, such as DHS and county agency personnel, during normal working hours to review such records, books, and accounts as needed to ascertain compliance with the nondiscrimination laws. If there are any violations of this assurance, DHS may withhold financial assistance and DHS/USDA shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the Contractor/Vendor and its successors, transferees, and assignees, as long as they receive Federal financial assistance or retain possession of any assistance from DHS/USDA.

The person whose signature appears below is authorized to sign this assurance and commit the Contractor/Vendor to the above provisions.

1-30-2017

Date

Paul Carlson, Executive Director

Name and Title of Authorized Contractor/Vendor (please print)

Paul Carlson

Signature of Authorized Contractor/Vendor

702 3rd Ave. S., Virginia, MN 55792

Street Address, City, State, Zip Code

Arrowhead Economic Opportunity Agency

Name of Contractor's/Vendor's County Human Service Agency

Contractor/Vendor: Please deliver this Assurance of Compliance to your county human service agency.

LAKE COUNTY HEALTH AND HUMAN SERVICES COMPREHENSIVE CIVIL RIGHTS PLAN COMPLAINT REFERRAL PROCESS

You have the right to file a discrimination complaint with Lake County Health and Human Services if you believe you have been treated in a discriminatory way. It is against the law for any human services agency to discriminate against applicants, clients or members of the public because of race, color, national origin, creed, religion, sexual orientation, public assistance status, age, disability or sex (including sex stereotypes and gender identity under any health program or activity receiving federal financial assistance).

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

Lake County Health and Human Services
616 Third Avenue
Two Harbors, MN 55616
218-834-8400 (Voice)
711 or 800-627-3529 (Relay)
218-834-8412 (Fax)

Or contact:

DHS Civil Rights Coordinator
Minnesota Department of Human Services
Office of Equal Opportunity
P O Box 64997
St. Paul, MN 55164-0997
(phone) 651-433-3040 or use your preferred relay service
(fax) 651-431-7444

Auxiliary Aids and Services: DHS provides auxiliary aids and services, like qualified interpreters or information in accessible formats, free of charge and in a timely manner to ensure an equal opportunity to participate in the complaint process.

Language Assistance Services: DHS provides translated documents and spoken language interpreting, free of charge and in a timely manner, when language assistance services are necessary to ensure limited English speakers have meaningful access to DHS' complaint process.

Contact DHS: 651-431-3040 (Voice) or use your preferred relay service.

It is against the law for anyone who works for Lake County to retaliate against a person who files a complaint or who cooperates in the investigation of a civil rights complaint.

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

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

Minnesota Department of Human Rights
Freeman Building, 625 North Robert Street
St. Paul, MN 55155
651-539-1100 (Voice)
800-657-3704 (Toll Free)
711 or 800-627-3529 (MN Relay)

The **U.S. Department of Health and Human Services' Office for Civil Rights** prohibits discrimination in its programs because of race, color, national origin, age, disability, religion and sex (including sex stereotypes and gender identity under any health program or activity receiving federal financial assistance). Contact the agency directly:

U.S. Department of Health and Human Services
Office for Civil Rights, Region V
233 North Michigan Avenue
Suite 240
Chicago, IL 60601
312-886-2359 (Voice)
800-368-1019 (Toll Free)
800-537-7697 (TTY)

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

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

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

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

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

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

This institution is an equal opportunity provider.

ADA/504 COORDINATOR

Lake County Health and Human Services has designated the Director of Lake County Health and Human Services, or his or her designee, as the ADA/504 Coordinator. The Director may be reached by the following methods:

By Mail:

Director, Lake County Health and Human Services
616 Third Avenue
Two Harbors, MN 55616

By Phone:

Main Telephone:	218-834-8400
Minnesota Relay:	711 or 800-627-3529
Fax:	218-834-8412

**LAKE COUNTY HEALTH AND HUMAN SERVICES
POSTING AND DISTRIBUTION OF DHS-4133-ENG
DO YOU HAVE A DISABILITY?**

In compliance with, and as a part of, the Lake County Health and Human Services Comprehensive Civil Rights Plan, it is hereby noted that the Minnesota Department of Human Services' ADA Brochure: "Do You Have a Disability" (DHS-4133-ENG) is posted in the following public areas of the agency:

- In the reception area where all visitors enter and register

<https://edocs.dhs.state.mn.us/lfsrserver/Public/DHS-4133-ENG>

This brochure is included in all information packets. These packets are provided to everyone requesting information about a specific program or programs, including Income Maintenance, Social Services, Day Care and Licensing.

Lake County Health and Human Services' disability policies and procedures are found on pages 5 and 6 of the Comprehensive Civil Rights Plan.

ANNUAL SNAP CIVIL RIGHTS TRAINING PROCEDURE

At least annually, all staff who administer the SNAP program or who come in direct contact with the public (including support staff, supervisors and managers) will receive SNAP Civil Rights Training using DHS's provided PowerPoint presentation.

ANNUAL COMPREHENSIVE CIVIL RIGHTS PLAN TRAINING PROCEDURE

Every year at the Agency's All Staff meeting, the Comprehensive Civil Rights Plan will be reviewed and discussed with all staff. LCHHS will document when the training takes place and who attends the training.

APPENDIX A

Lake County Health and Human Services
616 Third Avenue
Two Harbors, MN 55616
Telephone: 218-834-8400 Fax: 218-834-8412

Limited English Proficiency (LEP) Plan

July 2016

Contacts:

LCHHS Director:	Lisa Hanson	218-834-8415
LEP Coordinator:	Courtney Anderson, Supervisor	218-834-8423
Financial Services:	Courtney Anderson, Supervisor	218-834-8423
Social Services:	Beth Swanson, Supervisor	218-834-8416
	Maria VanSanten, Supervisor	218-834-8549

Limited English Proficiency Plan

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100 - Purpose and Legal Basis

The following document serves as the Lake County Health & Human Services (LCHHS) plan to offer meaningful access and to meet the legal obligation of language access requirements in compliance of Title VI of the Civil Rights Act of 1964, 42 USC 2000 et seq.; 45 CFR Part 80; Guidance to Federal Financial Assistance Recipients Regarding Title VI {Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 68 FR 47311 (2003); and 65 FR 52762 (2000).

There are four components to this document.

200 - Assessment

300 - Policy

400 - Training

500 - Monitoring

200 - Assessment

201 - Needs Assessment - LCHHS will on at least an annual basis make a needs assessment of the unique language needs within Lake County. Consultation will be made with the school district in the County. Additionally, consultation will be made with the Legal Aid office located in Duluth. Consultations will aim at trying to discern the types of non-English languages that are most predominant in Lake County and which constitute populations that the County serves or those that may be eligible for County-provided services. The County will also be amenable to receive County-specific data from the Department of Human Services to assist in this form of needs assessment. The following non-English language has been identified as being the most likely to be encountered in Lake County: **Spanish**

202 Case Finding - Specific language needs of each applicant with LEP will occur at the time of intake or application. This will primarily be done by reviewing the language preference questions on the Health Care Application (HCAPP) and the Combined Application Form (CAF). Language preferences will be entered into the applicant's primary language field in the MAXIS system. If an interpreter is needed, it also will be entered in the MAXIS system. If the main receptionist or intake worker suspects that the applicant is a person with LEP, the worker will present the LEP person with a card that lists the ten major languages in order to determine which language is involved, if any. It is expected that efforts will be made by LCHHS to provide same-day interpreter services. LCHHS may determine that meaningful access to non-English speaking applicants and recipients may include the use of translated documents which are available at DHS edocs website (<http://edocs.dhs.state.mn.us>).

203 Points of Contact - The greatest likelihood of need for interpreter services will be at the point of intake - at the time of an emergency or application for financial assistance. The principal point of contact will most likely be, therefore, in the office setting in Two Harbors. The most appropriate form of interpreter services will likely be language assistance in completion of an application for financial assistance or health care. The other point of contact may involve field-based contact when conducting child protection assessments. These contacts will typically take place in the home of the child's caretaker or parent.

204 Resources Needed - LCHHS will utilize its extant informal linkage with **Superior Translations** (1-218-727-2572) in Duluth, Minnesota, for interpreter services during normal business hours. Additionally, LCHHS will utilize **Language Line Services** (1-800-528-5888) after normal business hours. When feasible, on-site interpreter services will be made available and would be the first preference. (Note: The closest available interpreter is 26 miles from LCHHS.) Use of reciprocal faxing processes will be used when necessary to facilitate completion of applications and processing of interviews.

205 Timely Access - The **Superior Translations** (1-218-727-2572) service is available during customary business hours, Monday through Friday, 9:00AM to 4:00PM. **Language Line Services** (1-800-528-5888) are available 24 hours per day, 7 days per week. Contact with either entity will be made by commercial phone. When on-site interpreter services are to be used, it will be necessary to schedule appointments at mutually convenient times for the client and the interpreter.

300 Policies and Procedures

301 Agency Commitment - LCHHS is committed to the spirit of the Civil Rights Act of 1964. It recognizes the importance of providing meaningful access to all persons, including persons with LEP, to the various programs operated under the hubris of "Lake County Health & Human Services". LCHHS has, by prior action, adopted a policy statement entitled Civil Rights Compliance Requirements effective 1-1-95, this in conformity with DHS Bulletin #94-84A dated 12-27-94.

302 Range of Oral Language Assistance - There will be limited oral language assistance on site in the LCHHS Two Harbors-based agency from current agency employees. Employees have very cursory proficiency in several non-English languages. Rather, Lake County's current practice of using Superior Translations, Duluth (218 - 727-2572) will continue in the future. Use of **Superior Translations** services is seen as encompassing 100% of the LEP needs of LCHHS. Use of **Language Line Services** will take place as necessary.

LCHHS will take advantage of the 10 brief "free interpreter" documents for persons with LEP as they are made available by the Department of Human Services. Where applicable,

and as a program practice, LCHHS will use its best efforts to assign clients with LEP to bilingual staff who speak their language.

303 Uncommon Languages - There may be circumstances when clients present for services who use a language other than that most commonly used in Lake County. There may be languages such as Spanish, Russian, Hmong, Vietnamese, Khymer/Cambodian, Lao and Somali, as well as sign language, needed. Receptionist staff will refer all such cases to the Financial Assistance Supervisor, Social Service Supervisor or Director. This person will be responsible for trying to determine the client's language or country of origin. Once determined, contact will be made with an appropriate interpreter in the customary manner.

304 Affirmative Action - The LCHHS employee handling the case will inform either the client or the interpreter once it has been determined that interpreter services are needed, that there is no charge or fee for the service. This will be communicated in verbal form. At no time in the service delivery process will the client incur any costs associated with LEP-directed interpreter services.

305 Use of Family and Friends - Use of family or friends as interpreters is not the preferred method of providing interpreter services, and staff should never require, suggest, or encourage a client with LEP to use family members or friends as interpreters. However, when the intake worker has determined that it is not feasible to use formalized interpreter services, a consultation will be made with that workers immediate Supervisor or Director. Alternative methods of customer service will need to be discussed. If the worker has determined that a family member, friend or other responsible party can adequately perform the interpreter service, approval may be given. The worker needs to feel confident that the client's data privacy rights will be protected and that the quality of the interpreter services to be provided by the family member or friend will be acceptable.

The worker will need to document in the case file the extenuating circumstances for use of family or friends, particularly that the family was offered other interpreter services and that the client insisted that a family member or friend be used.

Under no circumstances may minor children be used for interpreter services.

306 Competency Standards for Interpreters - Any interpreter used for LEP services must be bi-lingual: fluent in English and fluent in the language of the client needing the service, and be able to convey information in both languages accurately, have had orientation/training that includes the skills and ethics of interpreting, have basic knowledge in both languages of specialized program terms or concepts, and be sensitive to the client's culture. When using professional interpreter services provided from a recognized agency, such as the

Superior Translations and Language Line Services, competency is presumed. When using family, friends or significant others, the intake worker must make a judgment as to the competency of the proposed interpreter. "Certification" as an interpreter is not a prerequisite.

307 Dissemination of LEP Plan - Copies of the LEP Plan will be provided to the following: all LCHHS employees who have direct client contact, area Legal Aid office, and Lake County Courthouse. A copy of the main public announcement of the public's right to language assistance services emphasizing that these services are offered free of charge is prominently displayed in the LCHHS central reception area (DHS - 1659).

308 Services To Illiterate - When confronted with a situation in which the client is illiterate - cannot read or write in his or her native language - it is incumbent that LCHHS find a suitable interpreter, one who can assist the person in completion of necessary forms, documents and the like. The LCHHS intake worker needs to make the determination, in conjunction with the interpreter, about the clients' literacy skills. The clear choice in dealing with cases of illiteracy will be to have an on-site interpreter. It may be necessary to schedule interviews when face-to-face interpreter services can be provided. Faxing of forms and over-the-phone services may be required on a case-by-case basis.

309 Emergency Situations - When a determination has been made that an emergency exists, LCHHS will take whatever steps are deemed necessary to ensure that all clients, including clients with LEP, have access to services within the appropriate time frames. LCHHS goal is to make services accessible within the required time frame, whether that means using an interpreter or any other appropriate type of language assistance.

310 Access To and Costs of Interpreters - Under no circumstances will LCHHS indicate - either verbally or in writing - that any applicant or client in need of LEP services will be charged for interpreter or translation services. All such services shall be at no expense to the applicant or client. Such services will be provided during all normal business hours and, when necessary, during non-business hours when an emergency has been determined to exist.

311 Notice of Service Availability - LEP clientele will be informed of the availability of free interpreter and translation services at the point when it appears that the client is not able to communicate in English. Notice of service availability will come from the DHS document in the central reception area. Distribution of the LEP Plan to various parties cited above will help in putting those entities on notice that interpreter and translation services are available on a timely basis and free of charge. Use of material that has been translated into Spanish will be used immediately when it has been determined that the person presenting for service is not able to understand English. Insofar as the Department of

Human Services has translated many forms into multiple languages, LCHHS will access these forms as necessary. Access to the Department's website at www.dhs.state.mn.us/forms will be made. Additionally, translated income maintenance forms located in TEMP Manual 12.01.13 will be accessed as needed.

312 County-Produced Materials - Insofar as the LEP census in Lake County is limited, it is not anticipated that LCHHS will develop any LCHHS-produced material. Rather, LCHHS will rely on the state-produced documents as the primary source of translated materials. Downloading of documents from the DHS web-page will also be used as necessary. LCHHS will follow DHS's translation numerical guidelines as required.

313 Procedure for Using/Distributing Translated Forms - Workers will always ask LEP clients if they want a translated form as opposed to an English version of the form. Workers will record a recipient's language preference for forms in a recipient's case file, and also automatically send translated versions of regularly distributed forms to recipients who have indicated a language preference.

314 Complaint Resolution Protocol - Any adverse action taken by LCHHS with which an applicant or recipient disagrees is subject to complaint. LCHHS has a formal complaint process that can be utilized to try to resolve any dispute. In the absence of local resolution, the person making the complaint will be informed in a language understandable to the grievant, of the process to follow to make a complaint. The complaint procedure will conform in all respects to the procedure included in the Lake County Health and Human Services Comprehensive Civil Rights Plan. Appropriate use of interpreter services with either the Superior Translations or Language Line Services to facilitate the dispute resolution process will take place.

315 Posting - A copy of the LCHHS LEP Plan will be posted on the main bulletin board in the central lobby.

400 Training

401 Distribution of LEP Plan - All LCHHS employees who have direct contact with clients will be provided a copy of the LEP Plan upon its adoption. If any changes are made in the document, a revised copy will also be provided to the same entities listed in #307.

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

- All Financial Services Staff

- All Social Services Staff

- All Office Support Staff

All Child Support Staff
All Public Health Staff
The Fiscal Supervisor
The Director

402 Training of Staff - Initial - With approval of the LEP Plan, there was initial training on the document for all staff at Lake County Health & Human Services. Annual training takes place for current staff during a "General Staff" meeting. For any new employee affected by the LEP Plan, this document will be incorporated into that person's orientation protocol at the time of hire.

403 Training of Staff - Ongoing - A review of the LEP Plan takes place on at least an annual basis at a General Staff LCHHS meeting.

500 - Monitoring

501 Evaluation of the LEP - On at least an annual basis, the LEP Plan will be reviewed for effectiveness. This review will normally take place in December. It will be coordinated by the LCHHS LEP Coordinator. The evaluation will involve consultation with representatives of the Financial Services Unit and Social Services Unit to determine compliance with the LEP Plan, identification of any problem areas and development of required corrective action strategies. Elements of the evaluation will include the following:

- *Number of persons with LEP in Lake County.

- *Assessment of current language needs of LCHHS applicants and clients to determine if the client needs an interpreter and/or translated materials; updating of case files which lack information about a client's language preference; determining if clients need to be asked their language preference at the time of certification.

- *Determining whether existing assistance is meeting the needs of applicants and clients with LEP.

- *Assessing whether staff members understand LCHHS LEP policies and procedures and how to carry them out, and whether language assistance resources and arrangements for those resources are still current and accessible.

- *Seeking and obtaining feedback from non-English or limited-English speaking communities in Lake County including applicants and clients as well as any known community organization or advocacy group working with non-English or limited-English speaking communities.

502 - LEP Contact Person -For purposes of the LEP Plan, Lake County's designated contact person is the Director with appropriate delegation made to the Financial Assistance Supervisor and the Social Service Supervisors of the agency.