



Dakota County Community Services Division Comprehensive Civil Rights Plan (CCRP)

Dakota County Community Services Division
1 Mendota Rd. W., Suite 500
West St. Paul, MN 55118
Phone: 651-554-5742
TTY: 651-438-4618

Civil Rights Coordinator: 651-438-4495 (voice)
ADA Coordinator: 651-438-4532 (Voice)

This plan in its entirety is posted on the County's public website:

<https://www.co.dakota.mn.us>

This Cover page with key contact information is posted in the County's Northern Service Center, Western Service Center, and Administrative Center.

American with Disabilities Act Advisory

For accessible formats of this Civil Rights Plan or for information about equal access to services, call 651-438-4495. TTY users may call 651-438-4618

Table of Contents

- I. Purpose
- II. Legal Authorities
- III. Civil Rights Coordinator
- IV. Equal Opportunity Policy and Procedure
- V. Civil Rights Complaint Resolution Procedure
- VI. Complaint Notification Form
- VII. Disability Compliance
- VIII. Limited English Proficiency Plan
- IX. Annual Civil Rights Training for the Supplemental Nutrition Assistance Program (SNAP)
- X. Civil Rights Assurance of Compliance
- XI. Administration of this Civil Rights Plan
- XII. Appendix
 - Attachment A-Full List of Legal Authorities
 - Attachment B- Dakota County Discrimination Complaint Form
 - Attachment C- Complaint Notification Form- for County to submit to
MN Department of Human Services
 - Attachment D- Disability Brochure; DHS-4133-ENG
 - Attachment E- Civil Rights Assurance of Compliance
 - Attachment F- LEP Plans

Purpose

As a recipient of federal financial assistance, Dakota County Community Services Division 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. Dakota County Community Services Division has a Comprehensive Civil Rights Plan (CCRP) to ensure that all eligible individuals receive equal access to program services and information. Its programs are operated in a nondiscriminatory way, without regard to race, color, national origin, age, disability, sex, sexual orientation, religion, political beliefs, creed, and public assistance status. In medical programs, sex includes sex stereotypes and gender identity under any health program or activity receiving federal funds. This CCRP also serves as a source of information for county agency staff and the general public. It sets out Dakota County Community Services Division'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 Authorities (See full list in Appendix, Attachment A)

- Title VI of the Civil Rights Act of 1964 (race, color, national origin)
- Section 504 of the Rehabilitation Act of 1973 (disability)
- Section 508 of the Rehabilitation Act of 1973 (disability)
- Title II of the Americans with Disabilities Act of 1990; State and local government services (disability)
- Age Discrimination Act of 1975 (age)
- Section 1557 of the Patient Protection and Affordable Care Act (added sex discrimination in health care programs)
- Title IX of the Education Amendments of 1972 (sex)
- Bilingual Requirements in the Food Stamp Program, Food and Nutrition Service, U.S. Department of Agriculture
- FNS Instruction 113-1, Civil Rights Compliance and Enforcement – Nutrition Programs and Activities, Food and Nutrition Service, U.S. Department of Agriculture (2005)
- Minnesota Human Rights Act, Chapter 363A

Civil Rights Coordinator

Dakota County has designated a Civil Rights Coordinator to serve as the agency's point person on civil rights matters raised by applicants, clients, and members of the public:

Skyler Jarvi, Civil Rights Coordinator
Dakota County
1590 Highway 55
Hastings, MN 55033-2343
651-438-4495 (voice)
651-438-4618 (TDD) or use your preferred relay service
Skyler.Jarvi@co.dakota.mn.us

Equal Opportunity Policy and Procedure

Dakota County Community Services Division Equal Opportunity Policy and Procedure

It is the policy of Dakota County Community Services Division 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.

Dakota County Community Services Division employees, services, programs, benefits, and policies will not discriminate against applicants, clients or members of the public because of race, color, national origin, sex, sexual orientation, age, creed, religion, political beliefs, disability or public assistance status. “Sex” includes sex stereotypes and gender identity under any medical or health program receiving federal financial assistance, such as Medical Assistance, CHIP programs, health clinics, insurance companies and state health insurance exchanges.

This policy covers Dakota County Community Services Division ‘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 Dakota County Community Services Division. The Minnesota Human Rights Act also applies to the work of Dakota County Community Services Division and those agencies carrying out its programs.

Program Accessibility for People with Disabilities

Dakota County Community Services Division 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, Dakota County Community Services Division will:

- Notify the public about rights and protections for people with disabilities under the Americans with Disabilities Act.
- Designate an ADA Contact and maintain a complaint procedure.
- Make sure that its buildings are physically accessible for people with disabilities.
- Assist individuals with disabilities to apply and qualify for benefits based on their eligibility.
- 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 Dakota County Community Services Division buildings located in West St. Paul, Apple Valley, and Hastings.
- Level access into the first floor of the Dakota County Community Services Division buildings located in West St. Paul and Apple Valley, with elevator access to all other floors.

Reasonable Modifications to Policies, Procedures or Practices

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

Effective Communication and Auxiliary Aids and Services

Dakota County Community Services Division 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, Dakota County Community Services Division 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, Dakota County Community Services Division will give primary consideration to the requests of people with disabilities. Dakota County Community Services Division 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, Dakota County Community Services Division will find another equally effective auxiliary aid or service.

Dakota County Community Services

Civil Rights Complaint Resolution Procedure

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

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

It is against the law for anyone who works for Dakota County 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 copies of the County's Equal Opportunity Policy for Customers and Clients, the Civil Rights Complaint Resolution Procedure, and the Dakota County Discrimination Complaint Form. Use the contact information below to file a complaint. You can also review the law and regulations that outlaw discrimination in the Civil Rights Coordinator's office.

Skyler Jarvi
Civil Rights Coordinator
Dakota County
1590 Highway 55
Hastings, MN 55033-2343
651-438-4495 (voice)
651-438-8178 (Fax)
651-438-4618 (TDD) or use your preferred relay service
Skyler.Jarvi@co.dakota.mn.us

A civil rights complaint may also be filed directly with the U.S. Department of Health and Human Services' Office for Civil Rights, the Minnesota Department of Human Rights, and/or the Minnesota Department of Human Services Equal Opportunity and Access Division (see Steps 6 and 7 in the Procedure below).

A civil rights complaint involving the Supplemental Nutrition Assistance Program may also be filed directly with the U.S. Department of Agriculture (see Step 6 in the Procedure below).

Procedure:

1. Civil rights complaints **must** be submitted to the Civil Rights Coordinator within 180 days of the date the alleged discrimination occurred. When a person contacts the Civil Rights Coordinator to inquire about filing a complaint, the coordinator must provide them with copies of the following:
 - Dakota County Equal Opportunity Policy for Customers and Clients
 - Civil Rights Complaint Resolution Procedure
 - Dakota County Discrimination Complaint Form.

2. To file a complaint, please fill out a copy of the Dakota County Discrimination Complaint Form and send it to the Dakota County Civil Rights Coordinator. Be sure to include your name, address, and phone number on the form, or resolution of your complaint may be delayed. The complaint **must** state the problem or action alleged and what you want the County to do to correct the situation. If you need assistance with your complaint, the Civil Rights Coordinator will help you.

3. Upon receipt of a complaint, the Civil Rights Coordinator will determine if it is a true civil rights complaint, requiring an investigation, or if it is a different type of complaint (such as those regarding program rules) that should be referred back to a program manager for follow-up. A true civil rights complaint is any complaint that alleges discrimination based on any of the following:

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

*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.

4. After the Civil Rights Coordinator has determined whether or not it is a true civil rights complaint, the coordinator will do the following:
 - a. Contact the complainant to inform them if their complaint will be handled as a civil rights complaint, or another type of complaint, and what the County will do to follow up (see options b, c, d below). The Civil Rights Coordinator should also remind the complainant what their rights are, in the event their complaint is determined to be a civil rights complaint.
 - b. If it is not a true civil rights complaint, it will be referred back to a program manager for follow-up.
 - c. If it is a true civil rights complaint involving the Supplemental Nutrition Assistance Program (SNAP), the Civil Rights Coordinator must forward the complaint to the

Minnesota Department of Human Services Equal Opportunity and Access Division.

- d. If it is a true civil rights complaint not involving the Supplemental Nutrition Assistance Program, the Civil Rights Coordinator will arrange for the complaint to be investigated. All parties involved in the complaint will be given an opportunity to submit relevant evidence. The Dakota County Employee Relations Department will issue a written decision on the complaint within 120 days after it is received. The County will maintain the complaint records and files for three years after the written decision is issued.
5. The person filing the complaint may appeal the decision by writing to the Civil Rights Coordinator within 15 days of receiving the written decision. A written decision in response to the appeal will be issued no later than 30 days after the appeal is filed. This decision is final.
6. The person filing the complaint must be informed that he/she can file a discrimination complaint **directly** with the U.S. Department of Health and Human Services' Office for Civil Rights or the U.S. Department of Agriculture (USDA) for the SNAP Program. Complaints filed with either of these federal agencies must be submitted within 180 days of the date the alleged discrimination occurred.
 - a. The **U.S. Department of Health and Human Services' Office for Civil Rights** prohibits discrimination in its programs because of race, color, national origin, age, disability, sex and religion. Sex includes sex stereotypes and gender identity discrimination that occurs in medical or health programs and clinics receiving federal financial assistance; these are programs, such as Medicaid, CHIP programs and insurance companies and state health insurance exchanges under Title I of the Affordable Care Act. Contact the federal agency directly:

U.S. Department of Health and Human Services Office for Civil Rights

Region V

233 N. Michigan Avenue Suite 240

Chicago, IL 60601

312-886-2359 (voice)

800-368-1019 (toll free)

800-537-7697 (TTY)

- b. USDA requires that the following nondiscrimination statement be provided **exactly** as it is shown below:

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

Persons with disabilities who required alternative means of communication for program information (e.g., Braille, large print, audiotope, 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.

7. Filing Complaints with State Agencies:

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

- a. Discrimination complaints may be filed directly with the Minnesota Department of Human Rights for up to one year after the date the alleged discrimination occurred. 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.

You may contact the Minnesota Department of Human Rights directly at:

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

- b. Discrimination complaints may be filed directly with the Minnesota Department of Human Services for up to 180 days after the date the alleged discrimination occurred

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. You may contact the Minnesota Department of Human Services directly at:

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 the Minnesota Department of Human Services.

8. Arrangements for People with Disabilities

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

Complaint Notification Form

Dakota County Community Services Division will use the Complaint Notification Form to notify DHS in writing of all service delivery discrimination complaints filed against Dakota County Community Services Division and resolved on the county agency level. Dakota County Community Services Division will make sure the complaint notification form is completed and sent to DHS within 90 days of the date the complaint was filed in the county, so DHS can report the complaint to the appropriate federal office. An example of the Complaint Notification Form – for County to submit to MN Department of Human Services is located in the Appendix, Attachment C.

Disability Compliance

Disability Law and Standard of Access for State and Local Government Services Section 504 of the Rehabilitation Act of 1973

Protects qualified individuals with disabilities from discrimination based on their disability in federally funded programs and services.

Title II of the Americans with Disabilities Act of 1990 (Title II of the ADA) protects qualified individuals with disabilities from discrimination on the basis of their disability when the discrimination occurs in state or local government services. An agency does not have to receive federal financial assistance to be required to comply with Title II of the ADA. An agency just must be a state or local government entity.

County human services agencies must ensure that people with disabilities are able to use their programs and services. Disability laws set out an equal access standard for providing services. This means that individuals with disabilities are entitled to equal access to human services programs; the same standard of access that applies to people without disabilities.

A public agency must reasonably modify its policies, procedures, and practices to avoid discrimination. A public agency must also take appropriate steps to ensure that its communications with individuals with disabilities are as effective as communications with others.

Americans with Disabilities Act (ADA) Coordinator

Dakota County has designated an ADA Coordinator to serve as its point person on disability matters raised by applicants, clients, and members of the public:

BJ Battig, ADA Coordinator
Dakota County
1590 Highway 55
Hastings, MN 55033-2343
651-438-4532 (voice)
651-438-4618 (TTY)
BJ.Battig@co.dakota.mn.us

Disability Complaints

People filing disability complaints will use Dakota County Community Services Division's Civil Rights Complaint Resolution Procedure (see Section V above).

ADA Notice Document

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

Division does not discriminate on the basis of disability. The notice document also gives information to the public about the rights of people with disabilities under the Americans with Disabilities Act.

A copy of the DHS brochure: Do you have a disability (DHS-4133-ENG) is located in the Appendix of this Plan; Attachment D. It is also posted at the Community Services reception desks in the Northern Service Center in West St. Paul and the Western Service Center in Apple Valley.

Disability Policy Prohibiting Discrimination

The Dakota County Community Services Division Equal Opportunity Policy and Procedure includes provisions which prohibit disability discrimination in human services programs. This policy is located in the lobby of the County's Northern Service Center, Western Service Center, and Administrative Center.

Limited English Proficiency Plan

We have Limited English Proficiency Plans for four of our areas of service: Employment and Economic Assistance, Social Services, Public Health, and Transportation. See Appendix, Attachment F.

Annual Civil Rights Training for the Supplemental Nutrition Assistance Program (SNAP)

Dakota County Community Services Division will conduct annual SNAP civil rights training for all staff who administer the SNAP program and all staff who have direct contact with the public, such as support staff, supervisors, and managers.

Dakota County Community Services Division will use DHS' PowerPoint presentation to train staff, document the date of the training each year, and document who attends the training.

Civil Rights Assurance of Compliance

The Dakota County Community Services Division Director and County Attorney representative have signed the Civil Rights Assurance of Compliance. A copy is located in the Appendix, Attachment E.

Administration of this Civil Rights Plan

Dakota County Community Services Division will:

Post this Civil Rights Plan on the County's public website, where it can be reviewed by staff and members of the public.

Review this Civil Rights Plan annually with ALL staff.

Post the cover page of this Civil Rights Plan, plus a copy of the DHS brochure: Do you have a disability (DHS-4133-ENG), at the Community Services reception desks in the Northern Service Center in West St. Paul and the Western Service Center in Apple Valley.

Conduct annual SNAP civil rights training for all staff who administer the SNAP program and all staff who have direct contact with the public, including support staff, supervisors and managers. Dakota County Community Services Division will document the date of the training each year, and document who attends the training.

Appendix

Attachment A – Full List of Legal Authorities

Federal

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

State

Minnesota Human Rights Act, Chapter 363A

Attachment B

Dakota County Discrimination Complaint Form

To file a complaint with Dakota County of illegal discrimination, please provide the following information and send this form to:

Dakota County Civil Rights Coordinator
Employee Relations Department
1590 Highway 55
Hastings, MN 55033

Please Print

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: _____ Email Address: _____

Name and address of County agency delivering the service/benefit including names of any employee(s) accused of wrongdoing:

Type of discrimination alleged: _____

Date of alleged discrimination: _____

Brief description of the alleged discriminatory act(s). (You may attach additional pages): _____

(continued on next page)

Attachment C

**COMPLAINT NOTIFICATION FORM
FOR DAKOTA COUNTY TO SUBMIT TO MN DEPARTMENT OF HUMAN SERVICES**

**COUNTY HUMAN SERVICE AGENCY COMPLAINT NOTIFICATION FORM
COMPLAINTS ALLEGING DISCRIMINATION IN SERVICE DELIVERY**

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

REQUIREMENT: County human service agencies must notify the DHS Civil Rights Coordinator within 90 days of all service delivery discrimination complaints (i.e., civil rights complaints) of the date the complaint was filed in the county (see bottom of form for contact information).

ACTION REQUIRED:
Send completed form to DHS Civil Rights Coordinator within 90 days of the date the complaint was filed (i.e. received by Dakota County Civil Rights Coordinator).

To complete form: type inside the gray box or write responses on the lines.

1. Contact Information of complainant:

Name of Complainant: _____

Address 1: _____

Address 2: _____

City, State: _____

Zip Code: _____

Telephone number: _____

Email address (optional): _____

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

Dakota County Agency: _____

Address 1: _____

Address 2: _____

City, State: _____

Zip Code: _____

Telephone number: _____

Name of employee: _____

Name of employee: _____

Name of employee: _____

Name of employee: _____

3. Type of discrimination alleged:

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

****This section for Dakota County Civil Rights Coordinator only****

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

ATTACHMENT D – DHS BROCHURE: *Do you have a disability* (DHS-4133-ENG)



Please tell us if you have a disability so we can help you access human services programs and benefits.

What medical conditions may be disabilities?

A disability is a physical, sensory, or mental impairment that materially limits a major life activity.

Types of disabilities may include:

- Diseases like diabetes, epilepsy or cancer
- Learning disorders like dyslexia
- Developmental delays
- Clinical depression
- Hearing loss or low vision
- Movement restrictions like trouble with walking, reaching or grasping
- History of alcohol or drug addiction, although current illegal drug use is not a disability.

If you are asking for or are getting benefits through either a county human services agency or the Minnesota Department of Human Services, that office will let you know if you have a disability using information from you and your doctor.

What help is available?

If you have a disability, your county or the state human services agency can help you by:

- Calling you or meeting with you in another place if you are not able to come into the office

- Using a sign language interpreter
- Giving you letters and forms in other formats like computer files, audio recordings, large print or Braille
- Telling you the meaning of the information we give you
- Helping you fill out forms
- Helping you make a plan so you can work even with your disability
- Sending you to other services that may help you
- Helping you to appeal agency decisions about you if you disagree with them.

You will not have to pay extra for help. If you want help, ask your agency as soon as possible. An agency may not be able to accommodate requests made within 48 hours of need.

How does the law protect people with disabilities?

The Americans with Disabilities Act (ADA) and the ADA Amendments Act are federal laws, and the Minnesota Human Rights Act is a state law. Each gives individuals with disabilities the same legal rights and protections as people without disabilities, including access to public assistance benefits. You will not be denied benefits because you have a disability. Your benefits will not be stopped because of your disability. If your disability makes getting benefits hard for you, your county human services agency will help you access all of the programs that are available to you.

Discrimination is against the law

You have the right to file a complaint if you believe you were treated in a discriminatory way by a human services agency. You can contact any of the following agencies directly to file a civil rights complaint.

The **Minnesota Department of Human Services, Equal Opportunity and Access Division**, 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 under any health program or activity receiving federal financial assistance). Contact the Equal Opportunity and Access Division directly:

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

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

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

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 and disability; in block grant complaints, religion and sex are included; and in medical



program complaints, sex includes sex stereotypes and gender identity under any health program or activity receiving federal financial assistance, such as Medicaid and CHIP programs, hospitals, clinics, employers, insurance companies and state health insurance exchanges created 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 North Michigan Avenue, Suite 240
Chicago, IL 60601
312-886-2359 (voice)
800-368-1019 (toll free)
800-537-7697 (TTY)

The **U.S. Department of Agriculture** prohibits discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)

If you wish to file a Civil Rights program complaint of discrimination, complete the **USDA Program Discrimination Complaint Form**, found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish).

For any other information dealing with Supplemental Nutrition Assistance Program (SNAP) issues, persons should either contact the USDA SNAP Hotline Number at 800-221-5689, which is also in Spanish or call the **State Information/Hotline Numbers** (click the link for a listing of hotline numbers by State); found online at http://www.fns.usda.gov/snap/contact_info/hotlines.htm.

USDA is an equal opportunity provider and employer.

Attention. If you need free help interpreting this document, ask your worker or call the number below for your language.

مؤرلا اىل علصرتا وا كغفرشم نم كل ذبلطا ، تقويثولا هذه قم جرتل قين اجم قدعاسم تدرا اذا ؛ فظح لام .1-800-358-0377

KMNt'sMKal' . ebIG~k''tUvkarCMnYyk~rgkarkbE''bäksarenHeday²tKit«fÅ sUmsYrG~kkan'sMNUmerOg
rbs'G~k ÉehATUrs&BImklex

1-888-468-3787 .

Pažnja. Ako vam treba besplatna pomoć za tumačenje ovog dokumenta, pitajte vašeg radnika ili nazovite 1-888-234-3785.

Thov ua twb zoo nyeem. Yog hais tias koj xav tau kev pab txhais lus rau tsab ntaub ntawv no pub dawb, ces nug koj tus neeg lis dej num los sis hu rau 1-888-486-8377.

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1-888-487-8251.

Hubachiisa. Dokumentiin kun bilisa akka siif hiikamu gargaarsa hoo feete, hojjettoota kee gaafadhu ykn afaan ati dubbattuuf bilbilli 1-888-234-3798.

Внимание: если вам нужна бесплатная помощь в устном переводе данного документа, обратитесь к своему социальному работнику или позвоните по телефону 1-888-562-5877.

Digniin. Haddii aad u baahantahay saawimaad lacag-la'aan ah ee tarjumaadda qoraalkan, hawlwadeenkaaga weydiiso ama wac lambarka 1-888-547-8829.

Atención. Si desea recibir asistencia gratuita para interpretar este documento, comuníquese con su trabajador o llame al 1-888-428-3438.

Chú ý. Nếu quý vị cần được giúp đỡ dịch tài liệu này miễn phí, xin gọi nhân viên xã hội của quý vị hoặc gọi số 1-888-554-8759.

LB10001 (3-13)

This information is available in accessible formats for individuals with disabilities by contacting your county worker. For other information on disability rights and protections to access human services programs, contact the agency's ADA coordinator.



Attachment E

MINNESOTA DEPARTMENT OF HUMAN SERVICES CIVIL RIGHTS ASSURANCE OF COMPLIANCE

NONDISCRIMINATION IN STATE AND FEDERALLY FINANCED PROGRAMS

DAKOTA COUNTY COMMUNITY SERVICES (HEREAFTER CALLED THE “COUNTY AGENCY”)

THE COUNTY AGENCY provides this civil rights Assurance of Compliance (hereafter called the “Assurance”) in consideration of and for the purpose of obtaining any and all federal financial assistance from the United States Departments of Health and Human Services and Agriculture. The County Agency agrees that compliance with this Assurance is a condition of continued receipt of federal financial assistance and that it is binding upon the County Agency directly or through contract, license, or other provider of services, as long as it receives federal or state financial assistance; and shall be submitted with the required Comprehensive Civil Rights Plan update.

THE COUNTY AGENCY ASSURES that it will comply with:

Title VI of the Civil Rights Act of 1964, as amended; Department of Health and Human Services, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons; Age Discrimination Act of 1975, 42 U.S.C. 6101, as amended; Section 504 of the Rehabilitation Act of 1973, as amended; Section 508 of the Rehabilitation Act of 1973, as amended; Title II of the 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 Director's Signature

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

Date County Attorney's Signature

Attachment F

Dakota County Community Services

Limited English Proficiency (LEP) Plans

Dakota County, Minnesota

Dakota County Northern Service Center
1 Mendota Rd. W., Ste 500
West St. Paul, MN 55118-4773

LEP Plans for:

- Social Services Department, Part 1
- Employment & Economic Assistance Department, Part 2
- Public Health Department, Part 3
- Transportation Coordination Assistance Program, Part 4



Revised September 2021

Limited English Proficiency Plan: Part 1

Dakota County Social Services Department

2021

Table of Contents

Purpose, Legal Basis, and Assessment

- A. Purpose and Commitment
- B. Legal Basis
- C. Assessment

Policies and Procedures

- A. Procedures for Accessing Interpreter Services
- B. Bilingual Staff
- C. Uncommon Languages
- D. Affirmative Action
- E. Minor Children
- F. Family and Friends
- G. Competency Standards for Interpreters
- H. Access to LEP Plan by Staff
- I. Services to Illiterate Clients
- J. Emergency Situations
- K. Public Notice of LEP Plan
- L. Translated Forms
- M. Complaint Resolution

Training

- A. Initial Distribution of LEP Plan to Staff
- B. Ongoing Training
- C. New Employee Orientation

Monitoring of LEP Plan

- A. Evaluation of LEP Plan
- B. Current Language Needs
- C. Updating Agency Files
- D. Evaluating Existing Resources/Services
- E. Evaluating Staff's Understanding of LEP Plan
- F. Community Feedback

Limited English Proficiency (LEP) Plan

Social Services Department

Dakota County, Minnesota

Department Name: Social Services

Contact Person: Calla Oftedahl, Administrative Manager

Phone number: (651) 554-6920

Fax number: (651) 554-6043

PURPOSE, LEGAL BASIS, AND ASSESSMENT

A. Purpose and Commitment

The Social Services Department has used the results of its needs assessment to develop and implement a comprehensive written policy on language access that will ensure effective communication between persons with LEP (Limited English Proficiency) and county agency staff.

The Dakota County Social Services Limited English Proficiency (LEP) Plan has been developed to serve its clients, prospective clients, family members of clients or prospective clients, or other interested members of the public who do not speak English or who speak limited English. A client has limited English proficiency when he/she is unable to speak, read, write, or understand the English language at a level that allows him/her to interact effectively with Dakota County Social Services staff.

People with Limited English Proficiency shall not be excluded from programs or from receiving information, or experience delays, denials, or termination of public services because of language barriers.

B. Legal Basis

According to the Office for Civil Rights (OCR), in order to avoid discrimination on the basis of national origin against persons with Limited English Proficiency (LEP), recipients of federal financial assistance from the U.S. Department of Health and Human Services must take adequate steps to ensure that persons with LEP receive the language assistance necessary to allow them meaningful access to services, free of charge.

This plan serves the purpose of meeting the legal obligation to provide meaningful access to person with LEP in compliance with:

Title VI of the Civil Rights Act of 1964; Statutory Citation: 42 USC 2000d et seq. Regulatory Citation: 45 CFR Part 80. Administrative Citation: 65 Fed. Reg. 52762 (2000).

C. Assessment

The Social Services Department has conducted a thorough assessment of the language needs of the LEP populations eligible to be served or likely to be directly affected by its programs.

POLICIES AND PROCEDURES

A. Procedures for Accessing Interpreter Services

Staff will follow the Dakota County Social Services Interpreter and Translator policy (Policy #2003), which is available on County's internal website under Social Services Policies.

Information on how to access interpreter services is available to staff in written form and on County's internal website under the Community Services Administration/Contracts Management web page.

Staff shall use Language Line Service to communicate with LEP persons by phone and in those situations when there was not time (or previous notification of need) to arrange for interpretation services. The Language Line is available 7 days a week, 24 hours per day. The "Quick Reference Guide" for use of Language Line has been disseminated to all staff members and a Language Line training video is available to staff for training on using Language Line services.

Staff shall arrange for scheduled interpretation services directly with the contracted agency that will provide such service. A list of contracted interpreter agencies is available on the County's internal website under the Community Services/Contract Management web page. Staff are emailed a link to the website whenever a change occurs to the list.

After using an interpreter, staff will fill out the Interpreter Services Verification Form (DAK 2597) to verify the appointment occurred and approve the service.

B. Bilingual Staff

Bilingual staff may be used for short questions and answers and translation of casual documents. When it is believed to be in the best interest of the client, Dakota County will use its best efforts to assign clients with LEP to bilingual staff members who speak their language.

C. Uncommon Languages

Staff should follow the procedures listed above under "Procedures for Accessing Interpreter Services." The Language Line Service is able to identify and provide interpretation in more than 140 languages. If staff are unable to locate an interpreter for an uncommon language through the contracted agencies, they are to contact the Administrative Operations Manager or the Interpreter Contracts Representative to locate additional resources.

D. Affirmative Action

Staff will initiate an offer of free language assistance to those clients who appear to have difficulty communicating in English, or whenever a client requests language assistance.

In addition, the LEP Plan (or notice of its existence with indicator of how to access copy) will be posted for public review in the lobby and on the County's website.

The following will also be implemented within Social Services to ensure access:

DHS poster relating to LEP needs will be posted in the reception areas for Social Services.

Language Identification Cards will be available in the reception areas for Social Services

"I speak" cards will be available to clients so they can more easily identify their primary language to others

E. Minor Children

Minor children should never be used as interpreters.

F. Family and Friends

Staff should never require, suggest, or encourage a client with LEP to use family members or friends as interpreters; instead, staff will offer free interpreter services to LEP clients. Family and friends may not be competent to act as interpreters because they may not be proficient enough in both languages, may lack training in interpretation, and/or have little familiarity with specialized program terminology. The use of family or friends could also result in a breach of confidentiality or reluctance on the part of clients to reveal personal information critical to their situations.

If the LEP person declines free interpreter services, the worker will document this (offer and decline) in the case file, but Dakota County may still choose to provide an interpreter for its own use and protection.

G. Competency Standards for Interpreters

The Social Services department will use contracted interpreter agencies, which will have provided documentation that their agency will provide competent and experienced interpreters.

Interpreters must be "competent" to provide interpreter services. To be "competent" the interpreter must be proficient in both English and the language of the LEP client and be able to convey information in both languages accurately, have had orientation or 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.

Feedback (from clients, providers and county staff) on the competency/skill of interpreters should be forwarded to the Administrative Operations Manager. This feedback will be used to evaluate the interpreter services received and determine whether to continue using those services.

In those circumstances when an agency or contracted interpreter cannot meet our needs (i.e. language specialty or within specific time frame), staff should contact the Administrative Operations Manager or the Interpreter Contract Representative to locate additional resources.

H. Access to LEP Plan by Staff

All Social Services staff can view the LEP plan on the on the county's internal web site under the department policies area. A paper-based copy will also be available at the reception desk(s) of all Social Services office sites.

I. Services to Illiterate Clients

Language services will be provided to persons with LEP who do not read their own language to the same extent as staff would assist an English speaker who does not read English.

J. Emergency Situations

When programs require access to services within short time frames that do not allow time to plan, Dakota County will take whatever steps necessary to ensure that all clients, including clients with LEP, have access to services within the appropriate time frames. For example, when a client needs an interpreter or other language assistance services to obtain expedited program services, Dakota County's goal is to make the services accessible within the required time frame, whether that means using an interpreter or any other appropriate type of language assistance. In emergencies that require immediate services, staff will utilize Language Line telephone-based services.

K. Public Notice of LEP Plan

A poster will be displayed in the lobby in multiple languages informing clients that Dakota County has a LEP plan which provides free language services in a timely manner and that they can view the plan by making a request to a member of the Social Services staff. The LEP Plan will be available in English, but bilingual staff or interpreters will be available to translate the plan for those who do not speak English but wish to read it.

The LEP plan is also available on County's internal website and/or from Social Services staff.

L. Translated Forms

The primary source of translated forms and applications is the Minnesota Department of Human Services (DHS). Staff may access translated forms and download them from the DHS website at www.dhs.state.mn.us/forms.

It is not anticipated that Dakota County Social Services will produce additional translated materials at this time. This need will be assessed each year as a part of the LEP Plan monitoring.

M. Complaint Resolution

If an applicant, client, or member of the public believes they have been discriminated against while seeking services from Dakota County, they should contact the County's Civil Rights Coordinator to file a complaint. The Civil Rights Coordinator can be contacted at:

Skyler Jarvi
Civil Rights Coordinator
Dakota County
1590 Highway 55
Hastings, MN 55033-2343
651-438-4495 (voice)
651-438-8178 (Fax)
651-438-4618 (TDD) or use your preferred relay service
Skyler.Jarvi@co.dakota.mn.us

For more information on filing a complaint, clients may refer to the Dakota County Civil Rights Plan, which is posted on the County's public website: <https://www.co.dakota.mn.us>. A paper copy of the Plan can be requested by calling the County's Civil Rights Coordinator at 651-438-4495.

Clients can inform their worker if they were dissatisfied with the in-person or Language Line interpreter. Staff will then notify the Administrative Manager of the feedback.

When a client indicates that they wish to file a complaint, staff will provide them with the phone number of the County's Civil Rights Coordinator (see information listed above). If a Civil Rights complaint is received in Dakota County, the LEP client will be given a copy of the Civil Rights booklet (DHS 3276) translated in their primary language.

III. TRAINING

A. Initial Distribution of LEP Plan to Staff

Staff were notified of the LEP Plan via e-mail in December 2001. This e-mail also indicated that a paper copy is available at the reception desk, as well as online through the County's internal website. In addition, an announcement was made at the first all-staff meeting following the plan's implementation.

B. Ongoing Training

Annual training is mandatory for all Social Services staff. Supervisors will monitor staff understanding of/compliance with the LEP Plan on an ongoing basis. In addition, supervisors will evaluate staff's understanding of and compliance with the LEP plan in conjunction with their annual performance review.

The Community Services Committee on Interpreter Services will notify staff when interpreter services procedures are updated and available on the County's internal website.

Contact persons for the LEP Plan\procedures will be designated to answer questions, address concerns, explain expectations of interpreters, etc. These contacts will also maintain an awareness of trainings offered outside of the county system regarding working with interpreter services, etc. that staff could be encouraged to attend. The contact person for Social Services is the Administrative Operations Manager.

C. New Employee Orientation

Supervisors will include the LEP Plan and procedures for accessing interpreter services as part of the initial new employee orientation. It will be the supervisor's responsibility to ensure that the new employee has an understanding of the need/purpose of the LEP Plan and the employee's responsibility to offer/provide interpreter services free of charge to all LEP clients.

IV. MONITORING OF LEP PLAN

A. Evaluation of LEP Plan

The Community Services LEP planning committee (consisting of at least one member from each department and a coordinator) will meet semi-annually to review and coordinate the LEP procedures and share information and resources.

Social Services also surveys clients every 8 months, including questions about the cultural competency of the services they received and including a question as to whether they were offered services in their own language.

B. Current Language Needs

When a Social Services worker has contact with a client, they should record in the case file the client's primary language and indicate any need/request for interpreter services.

Social Services will also track the interpreter use by number of clients and language requested (this information will be pulled from vendor payment data for interpreters).

C. Updating Agency Files

If primary language is not indicated in ongoing/current Social Services cases, the case worker will add information regarding primary language spoken and any need for interpreter services. As new clients contact/enter the Dakota County Social Services system, Intake and Assessment workers will gather and record this information for use by additional Social Services staff.

D. Evaluating Existing Resources/Services

Department Intake areas request and document language needs of referred clients. Dakota County collects data about languages that are used in the home from school districts and through census information, which can be used to guide determining language needs most commonly found in the county. Annually, when staff updates other client information, notation of language assistance is included in the client records after discussion with the client.

E. Evaluating Staff's Understanding of LEP Plan

Social Service staff's understanding of the LEP Plan/procedures and their ability to implement them will be assessed by their supervisor during routine annual staff reviews.

F. Community Feedback

The Department will seek feedback on the LEP plan by several methods. First it will utilize information gathered on a county level. The department will include survey items addressing these areas on department-generated surveys. It will also utilize connections with community organizations that are involved with our department for discussion and feedback on how the needs of people with limited English proficiency are being met and help in identification of barriers that exist along with ideas for possible solutions. A department representative will attend Community Services division meetings to review and coordinate the LEP plans and procedures.

County and Department processes will be utilized as a way to collect information from the public to provide feedback on the effectiveness of LEP in meeting client needs. Discussion with staff and community members and analysis of complaints about current assistance available will be utilized to help identify possible unmet needs.

Limited English Proficiency Plan: Part 2
Dakota County Employment & Economic Assistance

2021

Dakota County, Minnesota

Limited English Proficiency (LEP) Plan (Revised 6/20/2007, 6/22/2010, 2/27/2019)

Department Name: Employment & Economic Assistance Department

Name of Contact Person: Nadir Abdi, Director

Phone: 651-554-5953

Fax: 651-554-5748

TTY/TDD: 651-554-5616

TABLE OF CONTENTS

Purpose

- A. Purpose and Commitment
- B. Legal Basis
- C. Assessment

Policies and Procedures

- A. Written Procedures for Accessing Interpreter Services
- B. Bilingual Staff
- C. Uncommon Languages
- D. Affirmative Action
- E. Family and Friends
- F. Minor Children
- G. Competency Standards for Interpreters
- H. Access to LEP Plan by Staff
- I. Services to Illiterate
- J. Emergency Situations
- K. Public Notice of LEP Plan
- L. Translated Forms
- M. Complaint Resolution

Training

- A. Initial Distribution of LEP Plan to Staff
- B. Initial Training
- C. Ongoing Training
- D. New Employee Orientation

Monitoring of LEP Plan

- A. Evaluation of LEP Plan
- B. Current Language Needs
- C. Updating Agency Files
- D. Evaluating Existing Resources
- E. Staff's Understanding of LEP Plan
- F. Community Feedback

I. Purpose, Legal Basis, and Assessment

A. Purpose and Commitment

The Employment & Economic Assistance Department (E & EA) used the results of its needs assessment to develop and implement a comprehensive written policy on language access that will ensure effective communication between persons with LEP and county agency staff.

People with LEP shall not be excluded from programs or from receiving information, or experience delays, denials, or termination of public services because of language barriers.

B. Legal Basis

This plan serves the purpose of meeting the legal obligation to provide meaningful access to persons with LEP in compliance with:

Title VI of the Civil Rights Act of 1964; Statutory Citation: 42 USC 2000d et seq. Regulatory Citation: 45 CFR Part 80. Administrative Citation: 65 Fed. Reg. 52762 (2000)

C. Assessment

The Employment & Economic Assistance Department has conducted a thorough assessment of the language needs of the LEP populations eligible to be served or likely to be directly affected by its programs.

Interpreter Services Usage Data shows predominately Spanish and Somali as most common languages. According to MAXIS data warehouse report for March, 2010, top languages needing an interpreter were Spanish (37%), Somali (27%), Russian (8%), and Vietnamese (4%). Approximately 11% of MAXIS caseloads reported a language other than English. 66% of those indicated they need an interpreter. Per PRISM data in June 2010, 2% of child support clients needed an interpreter.

II. Policies and Procedures

A. Written Procedures for Accessing Interpreter Services

Three procedures are available for staff to use: "Interpreters-In Person" (oral), "Interpreters-Telephone," and "Interpreters-Translation." These procedures are regularly updated on the county's internal website in the online department procedures manual.

Staff uses the Language Line Service to communicate with LEP persons at the Client Intake Services (CIS) desk (reception desk) and during walk-in interviews. The Language Line is available 7 days a week, 24 hours per day. Refer to the cheat sheets for further instructions or to the procedure available on the county's internal website. For Scheduled Appointments, staff contacts the Client Intake Services desk to make arrangements for interpreter services. CIS has a list of available agencies and interpreters and will contact the interpreter to schedule an appointment. Refer to the online procedure for further instruction.

B. Bilingual Staff

Bilingual staff may be used for short questions and answers and translation of short documents. Refer to the E & EA Yellow Pages in Folio for a current list (query "interpreters"). Dakota County E & EA policy is to randomly assign cases to available staff. Caseloads are not specialized by language and we do not hire bilingual staff to serve as interpreters. Through our contracted services we are able to provide efficient and consistent interpreter services to meet our client's needs.

C. Uncommon Languages

Staff should follow the above-mentioned procedures in A. The Language Line Service offers more than 170 languages. The DHS LEP coordinator may be contacted for assistance in locating services for rare languages.

D. Affirmative Action

Staff will initiate an offer of free language assistance to clients who have difficulty communicating in English, or whenever a client asks for language assistance.

By reviewing the language preference questions on the HCAPP, the CAF, and child support application and by use of the Point cards we determine their language needs. Public Assistance Intake workers are required to note the language of the LEP person in his/her MAXIS record so that all staff can identify the language assistance needs of the client.

Child Support staff is required to update PRISM (NCDE, CPDE, CHDE) with demographics and language preference.

Signs are posted in two lobbies, EBT window, and other waiting areas stating in several languages that applicants and clients can receive free interpreter services and inviting them to identify themselves as persons needing language assistance.

Staff may use the "I speak" cards, Language Line Language Identification cards, or language selection posters at the reception desks to have clients identify their primary languages.

E. Family and Friends

As family and friends may not be competent to act as interpreters because they may not be proficient enough in both languages, may lack training in interpretation, and may not be familiar with specialized program terminology, staff will offer free interpreter services to LEP clients. Staff should never require, suggest, request, or encourage a client with LEP to use family or friends as interpreters. If the LEP person declines this service, the worker will document in case notes that services were offered and declined.

Family and friends (excluding minor children) can be used when requesting forms, dropping off completed paperwork, or calling with a question. Authorized representatives may interpret

for the client as long as doing so will not compromise the effectiveness of the interpretation. If the LEP person declines free interpreter services, the worker will document this in the case file, but the County may still choose to provide an interpreter for our own use and protection.

F. Minor Children

Minor children should never be used as interpreters.

G. Competency Standards for Interpreters

We use interpreter agencies contracted with Dakota County; they have provided documentation that they will provide competent and experienced interpreters. Competency includes:

- Being bilingual and fluent in both English and the language of the LEP client
- Accuracy and completeness
- Impartiality
- Confidentiality
- Accreditation when appropriate

Interpreters will have training/orientation that includes:

- The skills and ethics of interpreting
- Basic knowledge in both languages of specialized program terms or concepts
- Sensitivity to the client's culture

Staff must make a judgment as to the competency of the interpreter and provide feedback to the Supervisor. This feedback is used to evaluate the interpreter services received.

Court certified interpreters are used for Child Support hearings, and appeal hearings. Court Services provides certified interpreters for use in Child Support hearings.

H. Access to LEP Plan by Staff

All staff who has client contact, can view the LEP plan on the county's website in the online department procedures manual.

I. Services to Illiterate

Staff will assess client's literacy level and determine interpreter needs. For example, for a client who is unable to read in their own language, the worker should use an interpreter or Language Line services to complete required forms verbally. Staff should not send translated forms to illiterate clients. Staff should further inform the client to contact them for interpreter services when they receive a DHS or agency form. Staff must assist LEP clients who do not read their primary language to the same extent as staff would assist an English speaker who does not read English.

J. Emergency Situations

When programs require access to services within short time frames, staff will take whatever steps necessary to ensure that all clients, including clients with LEP, have access to services

within the appropriate time frames. For example, when a client needs an interpreter or other language assistance services to obtain expedited program services, the goal is to make the services accessible within the required timeframe, whether that means using an interpreter or any other appropriate type of language assistance. Staff will use the telephone-based Language Line services for immediate needs and same day emergencies or designated certified interpreter services.

K. Public Notice of LEP Plan

A poster is displayed in the lobby in multiple languages informing clients that Dakota County has an LEP plan which provides for free language services in a timely manner and that they can view the plan by making a request to staff.

The LEP plan is available on the county's website in the online department procedures manual and from Client Intake Services staff upon request.

L. Translated Forms

We insert notices, in appropriate languages, about the right of the LEP applicants and clients to free interpreters and other language assistance, in brochures, pamphlets, manuals, and other materials disseminated to the public and to staff. If the client has listed a non-English language preference, we use available translated DHS forms Workers provide the non-English version when requested by the LEP client.

The primary source of translated forms and applications is DHS. Staff may access translated forms and down load them from the DHS website at www.dhs.state.mn.us/forms. Common brochures are available in our lobby. It is not anticipated that Dakota County E & EA will produce additional translated materials at this time. Child Support orientation forms are provided in Spanish to non-custodial parents.

M. Complaint Resolution

If an applicant, client, or member of the public believes they have been discriminated against while seeking services from Dakota County, they should contact the County's Civil Rights Coordinator to file a complaint. The Civil Rights Coordinator can be contacted at:

Skyler Jarvi
Civil Rights Coordinator
Dakota County
1590 Highway 55
Hastings, MN 55033-2343
651-438-4495 (voice)
651-438-8178 (Fax)
651-438-4618 (TDD) or use your preferred relay service
Skyler.Jarvi@co.dakota.mn.us

Clients can inform the worker if they were dissatisfied with the in-person interpreter. Staff can record this on the interpreter billing form that is reviewed by the Program Administrative Supervisor or report the issue directly to the supervisor. The Supervisor reviews information and determines whether or not we will continue to use that interpreter's services.

If a client indicates that they wish to file an LEP complaint or discrimination complaint of any kind, our staff will provide them with:

Contact information for the County's Civil Rights Coordinator (see above)

A copy of the Civil Rights booklet, DHS 3276, translated in their language.

Staff should also notify their supervisor of any complaints received.

III. Training

A. Distribution of LEP Plan to Staff

Staff is notified of revision of the county's written policy on language access (LEP Plan). The LEP plan is posted on the county's website in the online department procedures manual. We inform staff that the updated procedures for accessing interpreter services are available on the county's website.

B. Initial Training

Staff attends a mandatory all-staff workshop that includes training on the LEP Plan and how to effectively use interpreters.

C. Ongoing Training

A PowerPoint slide show that is an overview of Office of Civil Rights requirements and explains the county's LEP plan and procedures, is the basis of a department wide training. Staff are required to view PowerPoint annually. Staff is notified when interpreter services procedures are updated and available on the county's website in the online department procedures manual. E&EA Diversity Committee sponsors continuous training to develop cultural competence in effectively communicating with LEP clients.

D. New Employee Orientation

Training on the LEP plan and related procedures is included in all training plans for new staff including financial workers, child support and collections workers, and office services staff. All new staff will review the PowerPoint training.

Language Line ID cards and "quick reference guides" are given to all staff that has public contact.

IV. Monitoring of LEP Plan

A. Evaluation of LEP Plan

The Community Services LEP planning committee (consisting of at least one member from each department and a coordinator) meets to review and coordinate the LEP procedures and share information and resources. The process will include making changes to the LEP plan where something is not working or could benefit from changes.

We review information from Data Warehouse reports by DHS on the number of LEP recipients in the service delivery area.

B. Current Language Needs

Dakota County staff sends clients with LEP the preferred translated forms when the same forms are sent automatically to clients in English, e.g. the Household Report Form, or the Health Care Programs Renewal Form.

All workers review MAXIS/PRISM panels to identify language preference.

C. Updating Agency Files

At recertification, the financial worker reviews the language preference question and needs and updates the case file.

D. Evaluating Existing Resources/Services

Feedback from staff and clients obtained from the Interpreter usage form and phone calls.

Feedback from applicants and clients obtained through annual client surveys.

Feedback obtained from Child Support walk-in clients through ongoing client surveys.

Complaints received from LEP persons.

The Program Administrative Supervisor routinely monitors and updates the procedures for accessing services.

E. Evaluating Staff's Understanding of LEP Plan

Staff's understanding of the LEP plan and procedures and their ability to carry them out is assessed as part of routine supervisory case reviews.

F. Community Feedback

We are responsive to feedback from community organizations regarding language services and accessing county services.

Limited English Proficiency Plan: Part 3
Dakota County Public Health Department

2021

Department Name:	Public Health
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Table of Contents

Purpose

- A. Purpose and Commitment
- B. Legal Basis
- C. Assessment

Policies and Procedures

- A. Written Procedures for Accessing Interpreter Services
- B. Bilingual Staff
- C. Uncommon Languages
- D. Affirmative Action
- E. Family and Friends
- F. Minor Children
- G. Competency Standards for Interpreters
- H. Access to LEP Plan by Staff
- I. Services to Illiterate
- J. Emergency Situations
- K. Public Notice of LEP Plan
- L. Translated Forms
- M. Complaint Resolution

Training

- A. Initial Distribution of LEP Plan to Staff
- B. Initial Training
- C. Ongoing Training
- D. New Employee Orientation

Monitoring of LEP Plan

- A. Evaluation of LEP Plan
- B. Current Language Needs
- C. Updating Agency Files
- D. Evaluating Existing Resources
- E. Staff's Understanding of LEP Plan
- F. Community Feedback

I. Purpose, Legal Basis, and Assessment

A. Purpose and Commitment

The Public Health Department used the results of its needs assessment to develop and implement a comprehensive written plan on language access that will ensure effective communication between persons with limited English proficiency and department staff.

People with limited English proficiency shall not be excluded from programs or from receiving information, or experiencing delays, denials or termination of public services because of language barriers.

B. Legal Basis

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 assure that persons with limited English proficiency receive language assistance necessary to allow them meaningful access to services, free of charge. This plan serves the purpose of meeting the legal obligation to provide meaningful access to persons with limited English proficiency (LEP) in compliance with:

Title VI of the Civil Rights Act of 1964; Statutory Citation: 42 USC 2000d et seq. Regulatory Citation: 45 CFR Part 80. Administrative Citation: 65 Fed. Reg. 52762 (2000)

C. Assessment

The Public Health Department conducted a thorough assessment of language needs of LEP populations eligible or likely to be served or directly affected by its programs.

II. Policies and Procedures

The Public Health Department uses three policies, policy #1003 Language Access Services, policy # 1002 Civil Rights Complaint Procedure, and policy # 1053 Testing to Ensure Sufficient Bilingual Skills for Bilingual Pay compensation to guide staff on language access services and civil rights obligations and procedures for handling civil rights complaints. These policies are accessible to department staff through the internal website. All staff receives information on use of the internal website to access key department information, such as county and department policies during new staff orientation. Information on how to access interpreter services, best practices when working with an interpreter, how to file a complaint about an interpreter, procedures to use when receiving a complaint, and access to the LEP and Civil Rights plan for the Public Health Department are examples of material available to staff on the internal website.

A. Language Line

Public Health uses an internal website to support staff access to language assistance services, including Language Line. The department website includes a link to a video about Language Line usage for staff training and written materials to support staff in accessing Language Line for oral language assistance by telephone. The Public Health new staff orientation includes use of telephone language assistance through Language Line and instructions on how to access language assistance by telephone.

State WIC has provided a separate language line account for use within the WIC program when providing services to limited English proficient clients.

Staff is provided information about Speech-to-Speech and Minnesota Relay (711) or (1-877-627-3848) to support language assistance by phone. Speech-to-Speech enables people with a speech disability to use their own voice, voice prosthesis, or communication device to make phone calls. Minnesota Relay provides telephone communication access for people who are deaf, hard-of-hearing, speech impaired, deaf-blind, or mobility impaired. First Call for Help (211) is listed and provides information about human services available in Minnesota and has access to information in other languages in addition to English.

B. Bilingual Staff

Bilingual staff will not work as interpreters, but rather will work within the position they are employed. Bilingual staff may use their language skills while working within their position and are assigned cases as best practice indicates and according to Public Health Department policy #1053-Testing to ensure sufficient bilingual skills for bilingual pay compensation. Bilingual staff may use interpreter services to assure effective communication with LEP clients.

C. Contracted Interpreter Services

Staff may arrange for interpreter services to provide “in-person” interpretation by the method that fits the service situation. If a client is on a PMAP, with a direct service that qualifies for reimbursement, the staff person will utilize PMAP authorized interpreter agencies and interpreters, with a preference for those also contracted with Dakota County. If the client is on Minnesota Care or straight MA or if a client does not have a reimbursement source for interpreter services, staff will utilize contacted agency provided interpreters. Agencies utilized to provide interpreters are selected based on those who have agreements to provide interpreter services for Dakota County. If a contracted agency is not able to fill an interpreter request, with supervisory consultation, an agency may be used from the state contact list for spoken language interpretation. Due to the need for adequate training and quality monitoring, Dakota County Public Health Department does not use independent contractor interpreters to provide services to our clients.

D. Uncommon Languages

When an uncommon language need exists, staff will access telephone language assistance. Staff will contact the PMAP Interpreter Services line, if a client is enrolled in a PMAP and visits are authorized through the PMAP for payment. If the PMAP is unable to locate an interpreter, telephone language assistance will be utilized and payment from the PMAP will be requested. Staff is required to discuss unmet language assistance needs with their supervisor who can assist staff in locating additional resources.

E. Affirmative Action

When limited English proficiency is identified, staff will initiate the offer of free interpreter services. If a client requests interpreter services, an interpreter will be scheduled for home visiting and clinic services. If an interpreter is unavailable to provide in-person interpretation or in situations where a LEP cannot be identified prior to point of contact, telephone language assistance will be utilized. If a client declines language assistance, this will be documented into the referral or client record. Signs are posted in the waiting area stating in several languages that clients can identify themselves as needing language assistance and that free interpreter service is available. Staff may use "I speak" or language identification cards to help identify the client's primary language.

F. Family and Friends

Family and friends may not be competent to act as interpreters due to their level of proficiency in both languages, they may lack training in the interpretive process, and may not be familiar with specialized terminology needing interpretation. The use of Family or friends could also result in a breach of confidentiality or reluctance on the part of clients to reveal personal information critical to their situations. Staff will offer interpreter services and if they are refused, document the refusal into the client record or other program specific areas. The department reserves the right to have a department provided interpreter present for their own use and protection, and to assure the interpretive process. This is especially important when working with vulnerable populations. Staff should never suggest, encourage, or request a client use family or friends as an interpreter.

G. Minor Children as Interpreters

Minor children should never be used to provide interpretation.

H. Competency Standards for Interpreters

The Public Health department will use contracted interpreters, which will have provided documentation that their agency will provide competent and experienced interpreters. Competency includes being bilingual and fluent in both English and the language of the LEP client, including in specialized terminology. It also includes accuracy, completeness, impartiality, confidentiality, and accreditation when appropriate, ethics, orientation or training that includes the skills of interpreting, and is sensitive to the client's culture. If staff concerns

develop related to services provided by interpreters, they need to contact their supervisor and provide written feedback about the concern. The supervisor will help determine a plan to report the issue to the interpreter agency, the PMAP authorizing the agency, and the Community Services Contract Unit along with the supervisor providing department oversight to LEP and Interpreter Services.

A process to assess the language skills of bilingual staff providing services in a non-English language is utilized to assess oral language proficiency and Public Health department policy #1053 provides guidance on this process. The testing process determines the functional speaking ability of a person by utilizing an industry-recognized standard to determine how well a person speaks a language by comparing their performance on specific communication tasks with criteria for assigning a proficiency level. The Public Health department utilizes this assessment process to determine the language proficiency of bilingual staff providing day-to-day language assistance in performance of their usual job duties when an interpreter to assist with communication will not be accessed to assure competency in service delivery in a language other than English. Bilingual staff may utilize interpreters to provide the level of language skills needed to provide specific client services. If a staff person speaks English as a second language and has successfully completed a post-secondary educational program taught in English, the testing process is at the option of the supervisor. If a countywide process to assess language proficiency of bilingual staff is developed, this process will be adopted by Public Health.

I. Access to Plan by Staff

All staff is oriented to the plan and department location during their new employee orientation. The LEP plan is accessible to all department staff through the internal department website. If a person requests to view our LEP plan, staff can create a printed copy from the electronically stored plan for this purpose.

J. Services to the Illiterate

Language services will be provided persons with LEP who do not read their own language to the same extent as what is provided to an English speaker who does not read English.

K. Emergency Situations

When programs require access to services on the same day resulting in short time frames, staff will take whatever steps necessary to ensure that all clients, including clients with LEP, have access to services within the appropriate time frames. For example, when a client needs an interpreter or other language assistance services to obtain program services, the goal is to make the services accessible within the required time frame, whether that means using an interpreter or any other appropriate type of language assistance.

Staff will utilize telephone-based Language Line services for situations requiring immediate language assistance. Staff will attempt to access an interpreter for in-person services requiring extended contact of one hour or more, if the service focus is the department's responsibility. If the contact is originating from another department and department staff is present to assist, it is

expected that the originating department will address language needs. If in-person interpreter services are unable to be arranged for oral language assistance, telephone interpretation is used.

L. Notice to the Public

A poster is displayed in the reception area in multiple languages informing clients that Dakota County will provide free interpreter services. The LEP plan is available on the Dakota County website and can be viewed by making a request to staff.

M. Translated Forms

The department will utilize state generated translated forms and forms translated for department use. DHS will be the primary source of translated forms and applications. Staff may access translated forms and download them from the DHS website at www.dhs.state.mn.us/forms. Oral interpretation will be utilized for department-required forms available in English only.

The department will evaluate forms utilized for client services. Translation of additional forms for department use will be discussed within the department management team and translation will be implemented on an as needed basis, when DHS translated forms are not available to meet this need. Staff will request translation of written materials when a need is identified. This request is submitted to supervisory staff.

N. Addressing Language Needs and Distributing Translated Forms to Clients

At intake, when receiving referral or community contacts, staff will access the MMIS recipient screen to help clarify if a client will need language assistance. Staff may also use Language Line to help identify a client's spoken language. Often the referral resource will identify the language needed for a client needing language assistance when making the referral to intake. Programs sending written materials to clients, such as forms, can utilize MMIS to clarify language assistance needs and access appropriate translated materials or use oral assistance options, when appropriate translated materials are not available. When forms are sent automatically in English, clients with LEP will be sent the translated version of the form. If staff identifies forms to be considered for translation or addition of a language block to direct the client to assistance, they need to contact their supervisor, who will bring the issue to the Public Health management team.

O. Complaint Resolution

If an applicant, client, or member of the public believes they have been discriminated against while seeking services from Dakota County, they should contact the County's Civil Rights Coordinator to file a complaint. The Civil Rights Coordinator can be contacted at:

Skyler Jarvi
Civil Rights Coordinator
Dakota County
1590 Highway 55
Hastings, MN 55033-2343
651-438-4495 (voice)
651-438-8178 (Fax)
651-438-4618 (TDD) or use your preferred relay service
Skyler.Jarvi@co.dakota.mn.us

The department staff receiving a civil rights or LEP complaint will contact their immediate supervisor to notify them about the discrimination complaint. The supervisor will provide the client with contact information for the County's Civil Rights Coordinator, along with a copy of the Civil Rights booklet (DHS 3276). The supervisor will follow the procedure to handle civil rights complaints outlined in the Community Services Division Civil Rights Plan. The supervisor is also responsible to notify the Public Health Director that a complaint is being filed.

Clients can inform staff if they were dissatisfied with the in-person interpreter. Staff will document in writing performance issues related to services provided by interpreters and provide this information to their supervisor. Significant Interpreter issues will be communicated to the department responsible for the contract. If services were obtained through the PMAP interpreter services line, the staff person after review with their supervisor will contact the PMAP to inform them of the concern. The supervisor will assist in determining whether the department will continue to use the services of the interpreter.

III. Training

A. Initial Staff Training

Department staff is introduced to the Limited English Proficiency Plan (LEP) during the orientation process for new staff. The legal basis for the LEP plan will be reviewed; applicable County and department policies, procedures and guidelines will be reviewed; resource material and information will be highlighted; and the location and components of the Limited English Proficiency plan will be reviewed. Training will also be completed during the orientation process on how to effectively use interpreters, how to access Language Line, and what forms are required related to interpreter use in person and by telephone.

B. Ongoing Training

The department reviews the Limited English Proficiency and division Civil Right plans annually. Staff is updated about any new resources, guidelines, policies and procedures, and best practices for effective use of interpreters as they become available or when changes are made in addition to annual reminders

C. New Employee Training

Countywide new employee orientation covers the Civil Rights Act policies at a county level. Department specific orientation is the responsibility of the supervisor of the new employee and may be delegated to another department staff member. The department Limited English Proficiency plan and Community Services Civil Rights plan is reviewed along with policy and procedures. The process to file a complaint is included in the training.

IV. Monitoring the Limited English Proficiency Plan

A. Existing Plan Effectiveness

County and Department processes will be utilized as a way to collect information from the public to provide feedback on the effectiveness of LEP in meeting client needs. Discussion with staff and community members and analysis of complaints about current assistance available will be utilized to help identify possible unmet needs.

B. Evaluating Staff understanding of LEP

The Community Services Division Contract Unit will oversee interpreter agency agreements.

Public Health staffs understanding of the LEP Plan/procedures and their ability to implement them will be assessed by their supervisor during orientation and routine annual staff reviews.

C. Current Language Needs

Department Intake areas request and document language needs of referred clients. Dakota County collects data about languages that are used in the home from school districts and through census information, which can be used to guide determining language needs most commonly found in the county. Annually, when staff updates other client information, notation of language assistance is included in the client record after discussion with the client.

D. Community Feedback

The Department will seek feedback on the LEP plan by several methods. First it will utilize information gathered on a county level. The department will include survey items addressing these areas on department-generated surveys. It will also utilize connections with community organizations that are involved with our department for discussion and feedback on how the needs of people with limited English proficiency are being met and help in identification of barriers that exist along with ideas for possible solutions.

A department representative will attend Community Services division meetings to review and coordinate the LEP plans and procedures.

Limited English Proficiency Plan

Dakota County Transportation Coordination Assistance Program

Dakota County, Minnesota
(Revised February 2019)

Contact Person: Calla Oftedahl, Administrative Manager, Social Services Department
Phone: 651-554-6920
Fax: (651) 554-6043

Table of Contents

Purpose, Legal Basis, and Assessment

- A. Purpose and Commitment
- B. Legal Basis
- C. Assessment

Policies and Procedures

- A. Procedures for Accessing Interpreter Services
- B. Bilingual Staff
- C. Uncommon Languages
- D. Affirmative Action
- E. Minor Children
- F. Family and Friends
- G. Competency Standards for Interpreters
- H. Access to LEP Plan by Staff
- I. Services to Illiterate Clients
- J. Emergency Situations
- K. Public Notice of LEP Plan
- L. Translated Forms
- M. Complaint Resolution

Training

- A. Initial Distribution of LEP Plan to Staff
- B. Ongoing Training
- C. New Employee Orientation

Monitoring of LEP Plan

- A. Evaluation of LEP Plan
- B. Current Language Needs
- C. Updating Agency Files
- D. Evaluating Existing Resources/Services
- E. Evaluating Staff's Understanding of LEP Plan
- F. Community Feedback

I. PURPOSE, LEGAL BASIS, AND ASSESSMENT

A. Purpose and Commitment

The Community Services Division has used the results of its needs assessment to develop and implement a comprehensive written policy on language access that will ensure effective communication between persons with Limited English Proficiency(LEP) and county agency staff.

The Dakota County Transportation Coordination Assistance Program (DCTCAP)LEP Plan has been developed to serve its clients, prospective clients, family members of clients or prospective clients, or other interested members of the public who do not speak English or who speak limited English. A client has limited English proficiency when he/she is unable to speak, read, write, or understand the English language at a level that allows him/her to interact effectively with DCTCAP staff.

The DCTCAP considers transit to be an important and essential service for many people living in our service area. LEP persons will use the DCTCAP to obtain information regarding the transportation options available to them based upon their needs. While the DCTCAP does not offer rides specifically, it assists older adults and persons with disabilities in their ride options available to them via our county-wide service providers.

People with LEP shall not be excluded from programs or from receiving information, or experience delays, denials, or termination of public services because of language barriers.

B. Legal Basis

According to the Office for Civil Rights (OCR), in order to avoid discrimination on the basis of national origin against persons with LEP, recipients of federal financial assistance from the U.S. Department of Health and Human Services must take adequate steps to ensure that persons with LEP receive the language assistance necessary to allow them meaningful access to services, free of charge.

This plan serves the purpose of meeting the legal obligation to provide meaningful access to persons with LEP in compliance with:

Title VI of the Civil Rights Act of 1964; Statutory Citation: 42 USC 2000d et seq. Regulatory Citation: 45 CFR Part 80. Administrative Citation: 65 Fed. Reg. 52762 (2000).

C. Assessment

The Community Services Administration Division has conducted a thorough assessment of the language needs of the LEP populations eligible to be served or likely to be directly affected by the DCTCAP.

Interpreter Services usage data shows predominately Spanish and Somali as the most common languages among Dakota County Community Services clients. According to MAXIS data warehouse report for March, 2010, top languages needing an interpreter were Spanish (37%), Somali (27%), Russian (8%), and Vietnamese (4%). Approximately 11% of MAXIS caseloads reported a language other than English. 66% of those indicated they need an interpreter. The American Community Survey data in 2010 indicates 1% of the older adults and persons with disabilities (DCTCAP clients) in Dakota County need an interpreter.

II. POLICIES AND PROCEDURES

A. Procedures for Accessing Interpreter Services

DCTCAP Staff will follow the Dakota County Social Services Interpreter and Translator policy (Policy #2003), which is available on County's internal website under Social Services Policies.

Information on how to access interpreter services is available to staff in written form and on County's internal website under Office Resources/Communicating with Residents.

Staff shall use Language Line Service to communicate with LEP persons by phone and in those situations when there was not time (or previous notification of need) to arrange for interpretation services. The Language Line is available 7 days a week, 24 hours per day. The "Quick Reference Guide" for use of Language Line has been disseminated to all staff members and a Language Line training video is available to staff for training on using Language Line services.

Staff shall arrange for scheduled interpretation services directly with the contracted agency that will provide such service. A list of contracted interpreter agencies is available on the County's internal website under the Office Resources/Communicating with Residents web page. Staff are emailed a link to the web page whenever a change occurs to the list.

B. Bilingual Staff

Bilingual staff may be used for short questions and answers and translation of casual documents. When it is believed to be in the best interest of the client, Dakota County will use its best efforts to assign clients with LEP to bilingual staff members who speak their language.

C. Uncommon Languages

Staff should follow the procedures listed above under “Procedures for Accessing Interpreter Services.” The Language Line Service is able to identify and provide interpretation in more than 140 languages. If staff are unable to locate an interpreter for an uncommon language through the contracted agencies, they are to contact the Administrative Operations Manager or the Interpreter Contracts Representative to locate additional resources.

D. Affirmative Action

DCTCAP Staff will initiate an offer of free language assistance to those clients who appear to have difficulty communicating in English, or whenever a client requests language assistance. In addition, the LEP Plan (or notice of its existence with indicator of how to access copy) is posted for public review in the reception areas of the following departments:

- Community Services Administration
- Community Corrections
- Employment and Economic Assistance
- Public Health
- Social Services

The notice will also be posted on the county’s website.

E. Minor Children

Minor children should never be used as interpreters.

F. Family and Friends

Staff should never require, suggest, or encourage a client with LEP to use family members or friends as interpreters; instead, staff will offer free interpreter services to LEP clients. Family and friends may not be competent to act as interpreters because they may not be proficient enough in both languages, may lack training in interpretation, and/or have little familiarity with specialized program terminology. The use of family or friends could also result in a breach of confidentiality or reluctance on the part of clients to reveal personal information critical to their situations.

If the LEP person declines free interpreter services, the worker will document this (offer and decline) in the case file, but Dakota County may still choose to provide an interpreter for its own use and protection.

G. Competency Standards for Interpreters

DCTCAP staff will use contracted interpreter agencies, which will have provided documentation that their agency will provide competent and experienced interpreters.

Interpreters must be “competent” to provide interpreter services. To be “competent” the interpreter must be proficient in both English and the language of the LEP client and be able to convey information in both languages accurately, have had orientation or 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.

Feedback (from clients, providers, and county staff) on the competency/skill of interpreters should be forwarded to the Administrative Operations Manager. This feedback will be used to evaluate the interpreter services received and determine whether to continue using those services.

In those circumstances when an agency or contracted interpreter cannot meet our needs (i.e. language specialty or within specific time frame), staff should contact the Administrative Operations Manager or the Interpreter Contract Representative to locate additional resources.

H. Access to LEP Plan by Staff

All DCTCAP staff can view the LEP plan on the on the county’s internal web site under the department policies area.

I. Services to Illiterate Clients

Language services will be provided to persons with LEP who do not read their own language to the same extent as staff would assist an English speaker who does not read English.

J. Emergency Situations

When programs require access to services within short time frames that do not allow time to plan, Dakota County will take whatever steps necessary to ensure that all clients, including clients with LEP, have access to services within the appropriate time frames. For example, when a client needs an interpreter or other language assistance services to obtain expedited program services, Dakota County’s goal is to make the services accessible within the required time frame, whether that means using an interpreter or any other appropriate type of language assistance. In emergencies that require immediate services, staff will utilize Language Line telephone- based services.

K. Public Notice of LEP Plan

A poster will be displayed in the lobby in multiple languages informing clients that Dakota County has a LEP plan which provides free language services in a timely manner and that they can view the plan by making a request to a member of the Dakota County staff. The LEP Plan will be available in English, but bilingual staff or interpreters will be available to translate the plan for those who do not speak English but wish to read it.

The LEP plan is also available on County's internal website and/or from DCTCAP staff.

L. Translated Forms

The primary source of translated forms and applications is the Minnesota Department of Human Services (DHS). Staff may access translated forms and download them from the DHS website at www.dhs.state.mn.us/forms.

It is not anticipated that the DCTCAP will produce additional translated materials at this time. This need will be assessed each year as a part of the LEP Plan monitoring.

M. Complaint Resolution

For more information on Dakota County's civil rights program, and the procedures to file a complaint, please contact the Minnesota Department of Transportation at the following:

Kim Collins, Civil Rights Director
Minnesota Department of Transportation Office of Civil Rights,
Mail Stop 170
395 John Ireland Blvd.
St. Paul, Minnesota 55155-1899
Phone: (651) 366-3150
Fax: (651) 366-3129

Dakota County operates the DCTCAP without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Minnesota Department of Transportation (MnDOT).

A notice is posted for public review in the reception areas of the following departments:

- Community Services Administration
- Community Corrections
- Employment and Economic Assistance
- Public Health
- Social Services

The notice will also be posted on the county's website.

III. TRAINING

A. Initial Distribution of LEP Plan to Staff

Staff were notified of the LEP Plan via e-mail in December 2001. This e-mail also indicated that a paper copy is available at the reception desk, as well as online through the County's internal website. In addition, an announcement was made at the first all-staff meeting following the plan's implementation.

B. Ongoing Training

Annual training is mandatory for all DCTCAP staff. Supervisors will monitor staff understanding of/compliance with the LEP Plan on an ongoing basis. In addition, supervisors will evaluate staff's understanding of and compliance with the LEP plan in conjunction with their annual performance review.

The Community Services Committee on Interpreter Services will notify staff when interpreter services procedures are updated and available on the County's internal website.

Contact persons for the LEP Plan\procedures will be designated to answer questions, address concerns, explain expectations of interpreters, etc. These contacts will also maintain an awareness of trainings offered outside of the county system regarding working with interpreter services, etc. that staff could be encouraged to attend. The contact person for the DCTCAP is the Transportation Coordinator.

C. New Employee Orientation

Supervisors will include the LEP Plan and procedures for accessing interpreter services as part of the initial new employee orientation. It will be the supervisor's responsibility to ensure that the new employee has an understanding of the need/purpose of the LEP Plan and the employee's responsibility to offer/provide interpreter services free of charge to all LEP clients.

IV. MONITORING OF LEP PLAN

A. Evaluation of LEP Plan

The Community Services LEP planning committee (consisting of at least one member from each department and a coordinator) will meet semi-annually to review and coordinate the LEP procedures and share information and resources. The process will include making changes to the LEP plan where something is not working or could benefit from changes.

B. Current Language Needs

If DCTCAP staff has contact with a client, they should connect the client with the appropriate department staff person to record in the case file the client's primary language and indicate any need/request for interpreter services.

All DCTCAP will connect the client with appropriate department staff to track the interpreter use by number of clients and language requested (this information will be pulled from vendor payment data for interpreters).

C. Updating Agency Files

If primary language is not indicated in ongoing/current DCTCAP cases, the case worker will add information regarding primary language spoken and any need for interpreter services. As new clients contact/enter the Dakota County DCTCAP system, Intake and Assessment workers will gather and record this information for use by additional department staff.

D. Evaluating Existing Resources/Services

Department Intake areas request and document language needs of referred clients. Dakota County collects data about languages that are used in the home from school districts and through census information, which can be used to guide determining language needs most commonly found in the county. Annually, when staff updates other client information, notation of language assistance is included in the client records after discussion with the client.

E. Evaluating Staff's Understanding of LEP Plan

The DCTCAP staff's understanding of the LEP Plan/procedures and their ability to implement them will be assessed by their supervisor during routine annual staff reviews.

F. Community Feedback

The DCTCAP is responsive to feedback from community organizations regarding language services and accessing county services. It is not anticipated that the DCTCAP will produce additional translated materials at this time. This need will be assessed each year as a part of the LEP Plan monitoring.