

# Partner Agency Civil Rights Training

Last update: September 2024

USDA Partner Agencies are required to complete civil rights training at a minimum of once a year.

Ensure that your new volunteers or staff review the information in this presentation as they join your team.

If there is a concern that any volunteer cannot understand and/or abide by the training and Civil Rights requirements, then that individual should not interact in any way with program applicants and participants or handle personal information.

After completing Civil Rights training, have each participant sign a Civil Rights Training Log.

Keep your training log in your records.

Lowcountry Food Bank staff will look for this at your routine site visits.

The training log can be found on the Lowcountry Food Bank website.

FEED. ADVOCATE. EMPOWER.  lowcountryfoodbank.org

**Civil Rights Training Log**

Agency Name and Code: \_\_\_\_\_

By signing this log, you certify that you have received Civil Rights training. No typed signatures or signatures all signed by the same person will be accepted.

Remember to keep a copy of this training log on-site at your agency. This training is mandatory for all Lowcountry Food Bank partner agencies receiving USDA commodities.

Printed Name	Signature	Date

## What is discrimination?

It is treatment which makes a distinction of one person or a group of persons from others; either intentionally, by neglect, or by the actions or lack of actions based on a protected class.

We must treat our neighbors and each other fairly and equitably, with dignity and respect. We have a legal obligation not to unlawfully discriminate either for or against anyone on the basis of protected classes.

It is impermissible to discriminate against someone based upon

- Race
- Age
- Color
- Religion
- Sex
- Gender identity or expression
- Sexual orientation
- National origin
- Disability
- Political beliefs



## Some examples of discrimination:

- Providing less food to a person based on their age or sex.
- Denying service to a person because of a disability.
- Becoming disruptive towards someone based on their national origin or sexual orientation.
- Retaliation against a person for expressing their religion or political beliefs.

# Considerations for Partner Agencies

- Civil Rights complaints and program complaints may be different. Civil Rights complaints are based on protected classes whereas program complaints may be based on dissatisfaction with an agency's policies or procedures.
- Partner Agencies should have procedures in place to assist those with disabilities. Keep in mind a disability may not be visible.
- Partner Agencies should have high customer service expectations and conflict resolution standards for their staff and volunteers. We want your neighbors to have a positive experience.



The *And Justice For All* poster must be displayed in view of neighbors and volunteers.

This poster explains the nondiscrimination policy of the USDA program and includes instructions for handling a discrimination complaint.

Make sure you use the May 2022 version.





## Collecting Race/Ethnicity and Disability Data in Link2Feed

This data is collected to ensure Civil Rights compliance with federal programs. Inform applicants that information is **requested** solely for the purpose of determining compliance with federal civil rights laws and has no effect on eligibility for USDA food.

Agencies should select "Prefer Not to Answer" in Link2Feed (where applicable) if the applicant declines to self-identify.

Agencies should not visibly assume a person's ethnicity or whether a person has a disability.

It may feel uncomfortable to ask neighbors about their race or disability status. Some ways to ask the questions could be "do you have a disability you would like to declare?" or "what race(s) would you prefer on your file?"

You may select only one ethnicity in Link2Feed:  
Hispanic or Latino / Non-Hispanic or Non-Latino.

Inform applicants that they may choose one or more races.



The Interpretive Services poster must be posted so that individuals that need a language interpreter know how to obtain the services.

Please make sure your volunteers are aware of this free service and understand how to utilize it.

**Instruction Card: Telephone Interpreting Services**

200+ Languages Available 24/7/365  
Direct Dial: 503-484-2425

**NEED AN INTERPRETER?**

1. Dial 1-800-CALL-CLI (1-800-225-5254)
2. When the operator answers, tell them:
  - If you need a third-party dial-out
  - Your customer code is **469521**
  - You are calling from **SC Dept of Agriculture**
  - The language you need
  - The **Name of the Food Pantry**
3. The operator will connect you promptly

**Recommendations for Using a Telephone Interpreter**

**For Outbound Calls:**

- If you need to reach a limited English proficient (LEP) individual at home or need a third-party dial-out, please first inform the CLI operator before the interpreter is connected.
- Once the interpreter is connected, you can tell the interpreter who to ask for (the LEP's name).
- At this time, you can also tell the interpreter how to proceed if the call goes to voicemail and what message to leave, if desired.

**For Inbound Calls:**

- Explain to the LEP individual that all information is confidential and encourage questions.
- Speak clearly.
- Smile and be kind; this helps the LEP individual feel more comfortable.
- If face-to-face and multiple people are in the room, speak one at a time.
- Speak freely; all CLI interpreters are sworn to confidentiality, neutrality, and the Interpreter Code of Professional Ethics.
- Encourage the interpreter to clarify terms with you if necessary.

 **CERTIFIED LANGUAGES**  
INTERNATIONAL

# Notice of Beneficiary Rights

Because TEFAP is financially supported by the federal government, partner agencies are required to let their neighbors know that

- Discrimination is not allowed
- Religious activities are not required to receive food and must not take place at the same time as food distribution
- Violations may be reported to the Department of Agriculture

## Written Notice of Beneficiary Rights for CSFP and TEFAP

### Written Notice of Beneficiary Rights

Name of Organization: \_\_\_\_\_

Because TEFAP and CSFP are supported in whole or in part by financial assistance from the Federal Government, we are required to let you know that:

1. We may not discriminate against you on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice;
2. We may not require you to attend or participate in any explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization) that are offered by our organization, and any participation by you in such activities must be purely voluntary;
3. We must separate in time or location any privately funded explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization) from activities supported with direct Federal financial assistance; and
4. You may report violations of these protections, including any denials of services or benefits by an organization, by contacting or filing a written complaint with the U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights Executive Director  
Center for Civil Rights Enforcement  
1400 Independence Avenue SW  
Washington, DC 20250-9410, or by email to [program.intake@usda.gov](mailto:program.intake@usda.gov)
5. If you would like to seek information about whether there are any other federally funded organizations that provide these kinds of services in your area, please contact:

The USDA Hunger Hotline:  
By Phone: 1-866-3-HUNGRY or 1-877-8-HAMBRE to speak with a representative from 7:00 AM – 10:00 PM Eastern Time.  
By Text: 914-342-7744 with a question that may contain a keyword such as “food,” “summer,” “meals,” etc. to receive an automated response to resources located near an address and/or zip code.

This written notice must be given to you before you enroll in the program or receive services from the program, unless the nature of the service provided or exigent circumstances make it impracticable to provide such notice before we provide the actual service. In such an instance, this notice must be given to you at the earliest available opportunity.

# Explicitly Religious Activities: Examples

<i>It is acceptable to...</i>	<i>It is unacceptable to...</i>
Having cross hanging on a wall at the food distribution facility.	Require participants to stand by the cross and recite a prayer prior to receiving USDA Foods.
Have a menorah on a table at the food distribution facility during the holiday season.	Refuse USDA Foods to participants who do not practice the Jewish faith.
Have a display stand at the front/back of the facility that contains faith-based pamphlets for anyone interested.	Insert faith-based pamphlets in bags or boxes when distributing USDA Foods.
Have a pastor or other religious official assist with the distribution of USDA Foods.	Force or encourage participants to have a religious conversation with the pastor or official prior to receiving USDA Foods.



All required signage must be posted in view of your neighbors, even if you are distributing food in a drive-thru.

You may display your posters on a portable bulletin board during your distribution.

All signage can be found on the Lowcountry Food Bank's website under the Partner Agencies tab.

## What to do if you receive a Civil Rights complaint?

- All staff and volunteers must know how to assist participants in any of these matters and/or whom to refer questions and concerns to.
- Refer the complainant to the *And Justice for All* poster which contains instructions and contact information for the government department that investigates discrimination complaints.
- **We are obligated to make this info available.** Inform the neighbor that they have **180 days** after the incident to file a complaint.
- Racial/Ethnic Data must be collected at the point of application and reported to determine the effectiveness of the program; however, it does not affect eligibility.



This concludes your Civil Rights Training.

Please be sure to complete your  
Civil Rights Training Log.

If you have any questions,  
contact a member of the Agency Relations team.

Thank you for your hard work  
serving your neighbors!