

Civil Rights Training Summary

The Emergency Food Assistance Program (TEFAP) & Commodity Supplemental Food Program (CSFP)

Introduction

This document is a summary of the Civil Rights Training given by the River Bend Food Bank to Iowa Agencies. This document should be used as a short summary to train volunteers at Iowa Agencies who use Iowa commodities; these commodities are provided by the US Federal Government through the “Farm Bill.” After reading this summary, please contact the director of your pantry/ feeding program to confirm that you have completed the Civil Rights Training Program. The director of your program should then have each volunteer sign a document which will be used by the River Bend Food Bank to track civil rights compliance.

The goal of Civil Rights Training is to ensure that Iowa Agencies use food items that flow from the US Federal Government in a way that conforms to national standards of fair and equitable treatment on the basis of protected classes. For agencies, USDA commodities, which the River Bend Food Bank provides to agencies, are defined as Federal Financial Assistance. With this distinction, the food must be used and distributed in a way that conforms to national standards. In addition, by following these guidelines, each agency will limit its risk of Iowa DHS intervention or potential complaints from dissatisfied customers. Because our goal is to provide sustainable and nutritious food to those in our community, compliance with these standards will help us achieve these goals now and in the future.

When this training is complete, a volunteer should understand the rights and responsibilities of those who patronize Iowa agencies and strive for equal treatment for all eligible participants. In addition, this training should eliminate reasons why eligible participants may not take part in an agency program.

The Laws

The collection of laws which inform the Civil Rights Training Program have been developed over the course of the last 50 years to shield “protected classes” from discrimination. The class distinctions which are protected from discrimination in the United States are race, color, national origin, age, sex, and disability. The laws which volunteers should be aware of are listed below, along with an example which will help to frame their application.

- Civil Rights Act of 1964. *“No person in the United States shall be discriminated against on the grounds of race, color, or national origin...[or] be subjected to discrimination under any [federal] program or activity.”* An example of violation of this law is assuming a potential client at an agency does not eat a particular food due to their national origin. Specifically, clients of Middle Eastern descent who, due to religious ideology, may not eat pork. Knowing this, all customers need to be offered the same food choices – regardless of their potential national origin.
- Age Discrimination Act of 1975. *“No person in the United States, shall, on the basis of age, be excluded from participation, [or] be denied the benefits of...any program or activity receiving Federal financial assistance.”* An example of compliance with this law is offering all individuals the same size portions. When serving a potentially older client, he or she must be offered the same size portion as other individuals. If the client requests less, then the volunteer can limit portion size.
- Title IX of the Education Amendments of 1972. *“No person in the United States shall, on the basis of gender, be excluded from the participation in, [or] be denied the benefits of...any educational program or activity receiving Federal Financial Assistance.”* Typically when this law is violated in an agency setting, a volunteer will treat women differently from men either by offering smaller portions to women or patronizing women in inappropriate ways. In order to remain compliant, volunteers should be aware of potential gender stereotypes and actively strive to combat them.
- Americans with Disabilities Act of 1990. This act, combined with others, outlawed discrimination on the basis of disability for any local, state, or federal program that provides financial assistance. In order to be compliant with this law, agencies must offer clients the same portions and items, regardless of perceived or actual physical or mental disability.

Understanding the Laws and Your Responsibilities

With this basic understanding of the laws which inform civil rights in the United States, agencies will have certain responsibilities to their community. Specifically for agency volunteers, volunteers must be prepared to serve individuals from these protected classes in an equal fashion.

Additionally, volunteers must be able to serve individuals with Limited English proficiency (LEP). This includes individuals who have a limited ability to read, speak, write, or understand English. This applies to immigrants, refugees, and individuals who are native-born citizens, but may have difficulty speaking or writing English due to either a poor education or debilitating disability. If a volunteer is having difficulty comprehending an LEP individual, remain calm and contact your supervisor for assistance. Ideally, your site will have forms and instructions from languages which are prevalent in your specific area. Volunteers may be used to translate one language to another, but confidentiality is extremely important in these situations!

If a volunteer identifies that a disabled individual is unable to reach your agency due to a lack of accommodations, a volunteer and agency supervisor must make some form of reasonable accommodation. For example, a pantry could let the family member of a disabled individual

shop on their behalf. Additionally, a box or meal could be brought to a space that the disabled individual can reach.

Finally, no organization that receives direct assistance from the USDA can discriminate against a participant or applicant on the basis of religion or religious belief. Faith-based organizations can strive for their mission, as long as USDA funds (or activities) do not support worship, religious instruction, or pressuring people to take their beliefs. Concretely, food or meals **CANNOT** be used as a reward for individuals who attend services and withheld from those who do not.

Failure to comply with any of the above laws will open agencies up to complaints from patrons, charges of non-compliance, and a potential loss of USDA commodities. None of us want to see this happen to any of our agencies. To prevent problems, volunteers must be mindful of their responsibilities and must remember that all individuals perceive slights and mistreatment in different ways. A respectful attitude and a cheery demeanor will always help mitigate potential concerns.

Public Notification, Taking Complaints, & Non-Compliance

Your agency will now have a “Justice For All” poster at their feeding site. All volunteers must be aware of the content of that poster. The poster states that every participant has the right to file a complaint if discrimination occurs.

If a participant asks to file a complaint, do not argue or attempt to dissuade them from doing so. The correct response is to find your pantry/feeding program director and alert them to the potential complaint. Between the complaint originator, the agency in question, and the River Bend Food Bank, we will hopefully find a solution which allows for the maximum satisfaction of each participant and the continued viability of the agency.

If you as a volunteer are the source of a complaint of discrimination, you must take corrective actions by desisting from any inappropriate actions and starting appropriate procedures.

Customer Service

Many of the issues in this training packet can be boiled down to one statement: follow the Golden/Platinum Rule.

“Treat others the way you would want to be treated.”

While agencies often suspect a handful of people abuse the system, the majority of individuals who will come to your agency are individuals who are facing serious issues stemming from economic, personal, or physical hardship. If a volunteer found themselves in the same position, he or she would not want to be accused of cheating the system. Remember, we do not know the stories of those we serve, only the superficial characteristics we see when we serve them. When a volunteer begins to believe that misuse of the system is rampant and focuses on this abuse more than providing service, he or she often loses the joy that comes from assisting those who are currently struggling.

If a volunteer senses that a customer feels mistreated, the volunteer can take early actions to remedy the situation such as slowing down, clarifying any potential misunderstandings, and changing the tone of conversation. An ability to master the above traits is critical to avoiding complaints and perceived violations of the laws discussed earlier.

If a situation becomes stressed and there is conflict, a volunteer should remain calm, explain the situation, and get help – especially if violence is a possibility. Below is a quick checklist that is essential in learning how to handle conflict.

- ▶ **What is the problem?** Using information given you determine what is wrong.
- ▶ **Determine a solution.** Know your organization’s policy on handling situations and information needed to offer a solution.
- ▶ **Gain approval from the customer.** Check with the customer for their approval on a solution.
- ▶ **Make an agreement.** You and the customer should determine what is to be done, when it is to be done, and by whom and alternatives if needed.
- ▶ **Follow up.** Make sure that the customer has been satisfied; and provide feedback.

Final Steps

Once you have completed this summary, you will sign the form titled “TEFAP Civil Rights Training Certification for Partner Agencies.” Training is required for all paid agency staff (who are involved in the administration of TEFAP) as well as volunteers who:

- Regularly interact with participants
- Handle personal information (TEFAP form)
- Determine eligibility

Volunteers who do not interact with program participants in any way and do not handle personal information do not need civil rights training.

Conclusion

Overall, the main goal of agencies which use Iowa USDA commodities is to provide for those who are less fortunate in our society. To accomplish this with respect and dignity, one should be aware of the laws and regulation that surround this process. It is a privilege to volunteer at these philanthropic organizations, a responsibility that should be handled with respect, equitable treatment, and a calm demeanor that will help to diffuse potential issues.