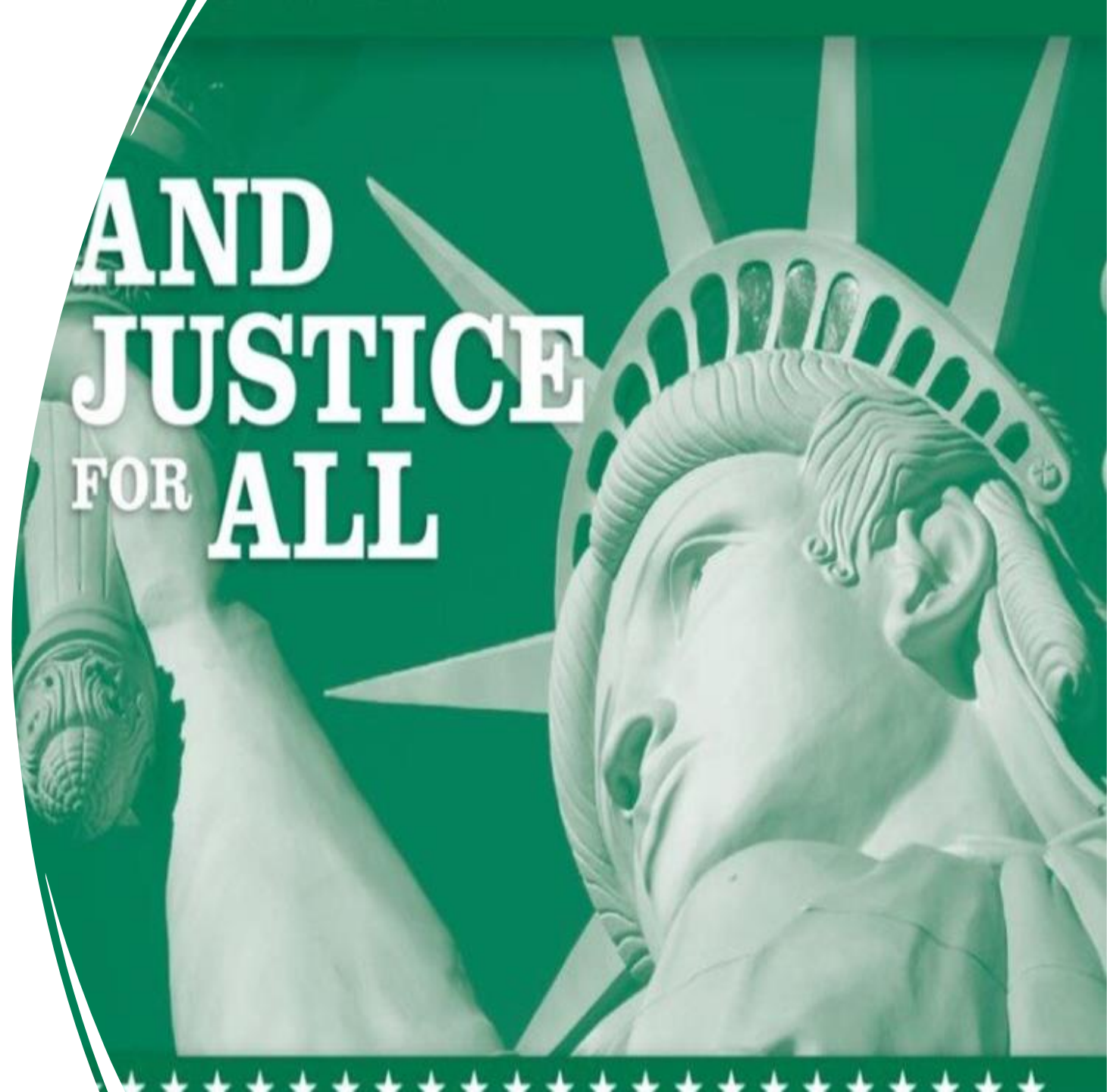


USDA Civil Rights Training

- Provided to you by the Illinois Department of Human Services
- TEFAP Program



Thank you!

- The State of Illinois Department of Human Services TEFAP team wants to THANK YOU for all you do to help prevent hunger in your community.
- Your work and volunteerism do not go unnoticed and is appreciated by those you serve and by us here at the State.



Training Attendance Sheet

TEFAP Distribution Site staff and volunteers: Please ensure you sign an attendance sheet. *This training is required annually and for "frontline staff" and those who supervise frontline staff, new staff or volunteers*

The attendance sheet will be reviewed by IDHS during management evaluation/quality assurance visits.

Print Name	Signature	Date (Month/Day/Year)

By signing, I acknowledge that I have completed the Civil Rights training and agree to the guidelines.

Purpose of **CIVIL RIGHTS** Training

To convey and ensure compliance of USDA policy related to civil rights.

The *goals* of this training are to:

- a. Ensure equal and consistent treatment for all neighbors.**
- b. Inform about program participants rights and responsibilities,**
- c. Eliminate barriers that prevent or deter people from receiving benefits.**
- d. Promote dignity and respect for everyone.**

AGENDA

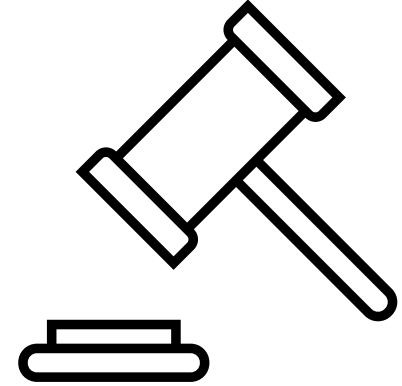


We will review the following topics:

- **Program Authorities**
- **Understanding Discrimination of Protected Classes**
- **Types of Discrimination and Examples of Discriminatory Acts**
- **Civil Rights Scenarios**
- **Customer Service and Conflict Resolution**
- **6 Areas of Civil Rights Compliance**

Program Authorities:

These acts, amendments, federal regs and instructions what the policies related to civil rights are based on.



Acts

Amendments

Federal
Regulation

USDA FNS
Instructions

Program Authorities

- Title VI of the Civil Rights Act of 1964
 - Race, Color, and National Origin
- Civil Rights Restoration Act of 1987
 - Clarifies the scope of the Civil Rights Act of 1964
- Section 504 of the Rehabilitation Act of 1973 & Americans w/Disabilities Act (ADA) of 1990 and ADA Amendments Act of 2008
 - Disability
- Title IX of the Education Amendments of 1972
 - Sex
- Age Discrimination Act of 1975
 - Age
- 7 CFR 15(a)(b)(c)
 - USDA implementing regulations for Federally assisted programs
- 7 CFR 16, “Equal Opportunity for Religious Organizations”
 - Gives equal footing to religiously affiliated organizations and beneficiaries freedom from religious discrimination.
- 28 CFR 35
 - Covers nondiscrimination based on disability in State/local government services (public entities)
- 28 CFR 42
 - Covers nondiscrimination in Federally assisted programs

Program Authorities (con't)

- Executive Order 13166
 - "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, August 11, 2000)
- Executive Order 13988
 - "Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation" (86 FR 7023, January 20, 2021)
- "USDA Guidance to Federal Financial Assistance Recipients Regarding the Title VI
 - Prohibition Against National Origin Discrimination Affecting Persons With Limited English Proficiency (79 FR 229, November 28, 2014)
- USDA Departmental Regulation 4300-003
 - Equal Opportunity Public Notification Policy
- USDA Departmental Regulation 4330-002
 - Prohibits discrimination in programs and activities funded in whole or in part by the USDA
- FNS Instruction 113-1 and Appendix C
 - Civil Rights compliance and enforcement
- The Emergency Food Assistance Act of 1983 (Public Law 98-8), as amended.(TEFAP)
 - 7 CFR Parts 250 & 251 (TEFAP)

Protected Classes

Our neighbors are shielded against discrimination for the following six protected classes under federal law.



Race

Color

National Origin

Sex

Disability

Age

What *is* discrimination?

Discrimination is the differing treatment of individuals or a group of individuals of a protected class; either intentionally, by neglect, or by the actions or lack of actions due to the individual(s) being a member of a protected class.

- USDA prohibits discrimination against its customers. The customers may file a complaint if they suspect or experience discrimination.
 - The Office of the Assistant Secretary for Civil Rights (OASCR), through the Center for Civil Rights Enforcement, will investigate and resolve complaints of discrimination in programs operated or assisted by USDA.

Race Discrimination

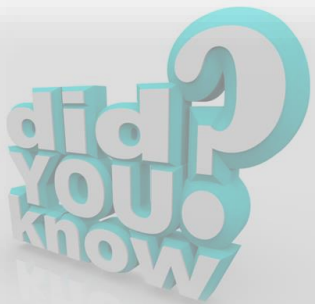
Occurs when an applicant or employee/volunteer is treated differently based on ancestry, physical, or cultural characteristics associated with a certain race, such as **skin color, hair texture or styles, or certain facial features.**



TEFAP on the federal level is exempt from collecting race and ethnicity data.

[\(FNS Instruction 113-1, Appendix C, Section D\)](#)

Federal data on race and ethnicity uses these five racial categories: American Indian or Alaska Native; Asian; Black or African American; Native Hawaiian or Other Pacific Islander; and White; “Hispanic or Latino” and “Not Hispanic or Latino” (select 1)



Color Discrimination

- Occurs when a person is treated differently from others based on **his/her skin pigmentation (lightness or darkness of the skin)**, complexion, shade, or tone.
- Can occur between **persons of different races or ethnicities, or even between persons of the same race or ethnicity.**

National Origin Discrimination

- involves treating a person unfavorably because they are from a particular **country or part of the world, because of ethnicity or accent, or because they appear to be of a certain ethnic background (even if they are not).**
- It can also involve treating people **unfavorably because they are married to (or associated with) a person of a certain national origin.**
- Discrimination can occur when the victim and the person who inflicted the discrimination are of the **same national origin.**

Disability Discrimination

- includes treating a person unfavorably based on a person's **physical or mental impairment which substantially limits one or more *major life activities**, the person has a record of such an impairment, or is regarded as having such an impairment.

*Major life activity defined: A function such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working, also functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, and reproductive functions (ADA Amendments Act of 2008.)

Sex Discrimination

- involves treating a person unfavorably because of that **person's sex, sexual orientation, gender identity, or pregnancy.**

Age Discrimination

- involves treating a person unfavorably **based on age**. It also means excluding **people over 40 from participation in, denying the benefits of,** or subjecting to discrimination under any program or activity receiving Federal financial assistance.

Additional Types of Discrimination

These are not federally protected classes for the TEFAP program, but neighbors are still protected through methods described below.



Religious Discrimination

- involves **treating a person unfavorably because of his or her religious beliefs**. The law protects not only people who belong to traditional, organized religions, such as Buddhism, Christianity, Hinduism, Islam, and Judaism, but **also others who have sincerely held religious, ethical or moral beliefs**.
 - can also involve treating someone differently because that **person is married to** (or associated with) an individual of a particular religion.
- [Religious Discrimination | U.S. Equal Employment Opportunity Commission \(eeoc.gov\)](https://www.eeoc.gov)

Written Notice of Beneficiary Rights (religious activities)

Written Notice of Beneficiary Rights

Name of Organization: _____
(food pantry, soup kitchen, or shelter)

Because The Temporary Food Assistance Program (TEFAP) is 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

Limited English Proficiency (LEP)

Discrimination against individuals **who do not speak English as their primary language** and who have a limited ability to read, speak, write, or understand English.

You must take reasonable steps to provide program information, materials and services to persons with LEP.



Examples of Discriminatory Acts

Discriminatory Acts

- Serving a non-minority before a minority who had arrived first.
Crossing the street, going on break, clutching personal belongings when in the presence of a minority.
- Saying epithets or discriminatory phrases based on stereotypes of protected classes.
- Making malicious jokes about racial stereotypes and saying that, “It’s all in good fun” or “it was just a joke”.
- Assumption of someone’s abilities or lack thereof due to their race, gender, or national origin.
 - “You’re (insert ethnicity/gender). You’re good with IT and computers, right?”



Civil Rights Scenarios

Civil Rights Scenarios

- A group of Pacific Islanders moved to the Austin neighborhood in Chicago (which is 75% Black) from Hawaii after the Lahaina fires destroyed their homes.
- Moana arrived from Hawaii last year and was excited that there was an influx of people from her native community that resettled near her house in Chicago. She decided to give back by volunteering at the Austin pantry where she befriended Daisy, a fellow Pacific Islander.
- One day, while Moana was volunteering, Daisy had just dropped her kids off to school and was running late to pick up her food box because of traffic. Moana put a food box aside for Daisy and told the Black neighbors in line that the food pantry was out of boxes.
- Once Daisy arrives, Moana serves Daisy in front of the neighbors who did not receive food.

What could Moana have done differently?

Civil Rights Scenarios

Moana violated the neighbors' civil rights by saving and distributing TEFAP foods to a friend while neighbors of a different race who were already in the pantry line were not given foods.

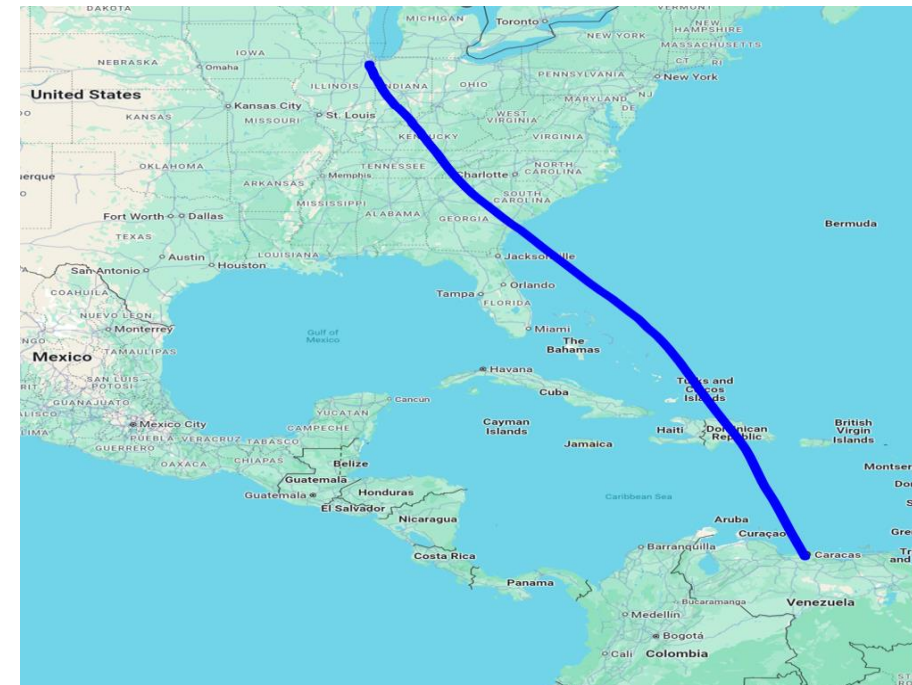
What could Moana have done differently?

- Let Daisy know that she is not able to save any foods for her or anyone.
- Ensure Daisy is aware of the pantry's hours of operation.

Civil Rights Scenarios

- The city of Chicago has an influx of new arrivals residing in shelters from Venezuela. The shelter is in a predominantly Asian community. The Asian neighbors and volunteers are upset that they must share food with the new arrivals.
- The volunteers refuse to serve the Venezuelans saying, "You already receive prepared food from the city!"

How can this be addressed?



Civil Rights Scenarios

- **This civil rights violation can be addressed by conveying the following messages:**
 - **TEFAP foods are available to all residents who are income eligible regardless of national origin or length of residency.**
 - **Refusing to serve new, eligible neighbors based on their national origin constitutes a Civil Rights violation.**
 - **Volunteers would be asked to complete Civil Rights training or a refresher. If the volunteers are non-compliant and refuse to serve all eligible neighbors, they would be unable to continue volunteering.**

Civil Rights Scenarios

- A neighbor tries to speak with a volunteer at a food pantry in a language other than English, but the volunteer cannot understand her. The volunteer apologizes in English and says, "We do not have anyone available who speaks your language".
- The neighbor leaves without being served.

**How could this have been handled differently?
What resources can be used to better serve
this neighbor?**



Civil Rights Scenarios

- A neighbor complains that the church where she picks up her food requires her to participate in a prayer service before taking her food home.
- A neighbor in line asks a pantry volunteer to pray with her while she waits for her turn to receive USDA Foods.
- The church room from which TEFAP foods are distributed has many brochures laid out regarding church services.

Have you seen similar events occurring at a site where TEFAP is distributed? Are these allowable acts?

Civil Rights Scenarios

Each of the above is prohibited. It may seem counterintuitive that a neighbor in line, in a church, cannot have a site volunteer pray with them. However, the Code of Federal Regulations at 7 CFR 16.4(b) states that: Organizations that receive USDA direct assistance under any USDA program may not engage in explicitly religious activities, including activities that involve overt religious content such as worship, religious instruction, or proselytization, as part of the programs or services funded by USDA direct assistance. If an organization conducts such activities, the activities must be offered separately, in time or location, from the programs or services supported with USDA direct assistance, and participation must be voluntary for beneficiaries of the programs or services supported with such USDA direct assistance.

What does this mean?

Any activity that is religious in purpose must be held either:

- i. At a separate location or,**
- ii. During a time when USDA Foods are not being distributed (i.e., outside of the hours of operation for TEFAP distribution).**

Customer Service and Conflict Resolution

What are some effective ways to provide good customer service and resolve conflicts?



Conflict Resolution: Key Points

- Typically, customers who are behaving in a difficult manner usually have not had their expectations met or do not fully understand the role of the worker.
- Often, the customer is focused on getting immediate assistance with solving a problem and does not feel the worker is helping.
- Generally, people do not want to be difficult or argumentative with a caring individual. The customer may not be aware of how their negative behavior is affecting others.

Conflict Resolution: Communication components to defuse a difficult situation..

- **Words**
- **Tone of Voice**
- **Body Language**
- **A combination of these components when having face-to-face interactions with our customers.**
- **Each component “says” something to our customer.**



More than 93% of all communication is nonverbal.

More on this: <https://www.psychologytoday.com/us/blog/surprise/202003/the-body-language-myth>

Conflict Resolution: Tips for working with people during difficult situations: Resolution

- Remain calm.
- State that you want to help and ask how you can be of assistance.
- Using information provided, determine what the issue is.
- Take time to try to understand the person's point of view. Listen for details about the concern, situation, or request. Repeat the concern or request to make sure you understand the person's expectations
- When appropriate, apologize for the situation.
- Offer solutions. Take responsibility for finding a solution, or for putting a solution into action.
- Don't take the situation personally.
- Follow up. Personally make sure that the customer has been satisfied; and provide feedback.

Conflict Resolution Tips

- **If you have tried to assist the person by providing the best customer service you can, and the person remains argumentative or outright abusive, then do not allow yourself to be abused, and do not argue back.**
- **Keep your own sense of self-confidence but remain helpful.**
- **Anytime you feel that someone is truly physically threatening, get away from the person and call the police.**

Different training requirements

Volunteers can stop the training here. You have fulfilled your annual training requirements.

Frontline staff, those who supervise frontline staff and new employees, please continue this training.

Six Areas of Civil Rights Compliance





Six Areas of Civil Rights Compliance

- Public Notification
- Data Collection
- Annual Training
- Compliance Reviews
- How to recognize and handle Civil Rights Complaints
- Assurances

Public Notification

- All FNS assistance programs must include a public notification system to inform applicants, participants, and potentially-eligible persons of:
 - Program Availability
 - Program Rights and Responsibilities
 - The Policy of Nondiscrimination
 - The Procedure for Filing a Complaint

Six Areas of Civil Rights Compliance

Elements of Public Notification

State agencies and their subrecipients must:

- Make **program information available** to the public upon request
- Inform **potentially eligible persons**, applicants, participants and grassroots organizations of programs or changes in programs, program Rights and Responsibilities, the Policy of Nondiscrimination and the Procedure for Filing a Complaint
- Convey the **message of equal opportunity in all photos** and other graphics that are used to provide program or program-related information
- Notify persons with disabilities about the **availability of reasonable modifications and auxiliary aids and services.**
- Notify persons with LEP of their **right to free language assistance** services.
- Prominently display the **“And Justice for All”** poster



AND JUSTICE FOR ALL

In accordance with Federal law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, disability, and reprisal or retaliation for prior civil rights activity. (Not all prohibited bases apply to all programs.)

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotope, and American Sign Language) should contact the responsible State or local Agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form, which can be obtained online, at <https://www.ascr.usda.gov/sites/default/files/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

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

fax:
(833) 256-1665 or (202) 690-7442;

email:
program.intake@usda.gov.

This institution is an equal opportunity provider.

Conforme a la ley federal y las políticas y regulaciones de derechos civiles del Departamento de Agricultura de los Estados Unidos (USDA), esta institución tiene prohibido discriminar por motivos de raza, color, origen nacional, sexo, edad, discapacidad, venganza o represalia por actividades realizadas en el pasado relacionadas con los derechos civiles (no todos los principios de prohibición aplican a todos los programas).

La información del programa puede estar disponible en otros idiomas además del inglés. Las personas con discapacidades que requieran medios de comunicación alternativos para obtener información sobre el programa (por ejemplo, Braille, letra agrandada, grabación de audio y lenguaje de señas americano) deben comunicarse con la agencia estatal o local responsable que administra el programa o con el TARGET Center del USDA al (202) 720-2600 (voz y TTY) o comunicarse con el USDA a través del Servicio Federal de Transmisión de Información al (800) 877-8339.

Para presentar una queja por discriminación en el programa, el reclamante debe completar un formulario AD-3027, Formulario de queja por discriminación del programa del USDA, que se puede obtener en línea, en <https://www.ascr.usda.gov/sites/default/files/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, en cualquier oficina del USDA, llamando al (866) 632-9992, o escribiendo una carta dirigida al USDA. La carta debe contener el nombre, la dirección y el número de teléfono del reclamante, y una descripción escrita de la supuesta acción discriminatoria con suficiente detalle para informar al Subsecretario de Derechos Civiles (ASCR, por sus siglas en inglés) sobre la naturaleza y la fecha de la presunta violación de los derechos civiles. La carta o el formulario AD-3027 completado debe enviarse al USDA por medio de:

correo postal:
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; o'

fax:
(833) 256-1665 o' (202) 690-7442;

correo electrónico:
program.intake@usda.gov.

Esta institución ofrece igualdad de oportunidades.

“ And Justice for All” Poster

The poster is **part of the public notification process and provides participant rights and responsibilities** as well as information on filing a Civil Rights complaint.

The poster must be displayed in a prominent location at the point of service and visible to all program volunteers and participants.
AD-475A

If you do not have the new version you may Print in 11x17 and in appropriate color (green).

Written Notice of Beneficiary Rights

Name of Organization: _____
(food pantry, soup kitchen, or shelter)

Because The Temporary Food Assistance Program (TEFAP) is 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
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:

To find local TEFAP distribution sites contact:

The USDA Hunger Hotline:

Phone: 1-866-3-HUNGRY or 1-877-8-HAMBRE to speak with a representative from 7:00 AM – 10:00 PM ET.

State of Illinois TEFAP:

Phone: (217) 558-0030

Or visit the University of Illinois Find Food map:

Website: <https://eat-move-save.extension.illinois.edu/>

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.

Written Notice of Beneficiary Rights (religious activities)

How to inform neighbors about Written Notice of Beneficiary Protections

TEFAP

To notify current and future or prospective beneficiaries, organizations providing TEFAP services must supply written notice of beneficiary protections under 7 CFR Part 16 by choosing one or more of these three methods:

1. Post a written notice at service locations. The posted written notice must be visible to all TEFAP beneficiaries and prospective beneficiaries upon entrance into the distribution site;
2. Provide flyers or handouts at each distribution; and/or
3. Add the written notification to their TEFAP intake form.

Each organization must select a method that will result in all TEFAP beneficiaries and prospective beneficiaries being notified. The chosen method(s) for notifying beneficiaries and prospective beneficiaries must be fully implemented as soon as possible. Sample implementation language is included as an attachment to this memorandum in [Attachment A](#).

Nondiscrimination Statement

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted 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; or

2. fax:

(833) 256-1665 or (202) 690-7442; or

3. email:

program.intake@usda.gov

This institution is an equal opportunity provider.

Nondiscrimination Statement (*Spanish*)

De acuerdo con la ley federal de derechos civiles y las normas y políticas de derechos civiles del Departamento de Agricultura de los Estados Unidos (USDA), esta entidad está prohibida de discriminar por motivos de raza, color, origen nacional, sexo (incluyendo identidad de género y orientación sexual), discapacidad, edad, o represalia o retorsión por actividades previas de derechos civiles.

La información sobre el programa puede estar disponible en otros idiomas que no sean el inglés. Las personas con discapacidades que requieren medios alternos de comunicación para obtener la información del programa (por ejemplo, Braille, letra grande, cinta de audio, lenguaje de señas americano (ASL), etc.) deben comunicarse con la agencia local o estatal responsable de administrar el programa o con el Centro TARGET del USDA al (202) 720-2600 (voz y TTY) o comuníquese con el USDA a través del Servicio Federal de Retransmisión al (800) 877-8339.

Para presentar una queja por discriminación en el programa, el reclamante debe llenar un formulario AD-3027, formulario de queja por discriminación en el programa del USDA, el cual puede obtenerse en línea en:

<https://www.usda.gov/sites/default/files/documents/ad-3027s.pdf>, de cualquier oficina de USDA, llamando al (866) 632-9992, o escribiendo una carta dirigida a USDA. La carta debe contener el nombre del demandante, la dirección, el número de teléfono y una descripción escrita de la acción discriminatoria alegada con suficiente detalle para informar al Subsecretario de Derechos Civiles (ASCR) sobre la naturaleza y fecha de una presunta violación de derechos civiles. El formulario AD-3027 completado o la carta debe presentarse a USDA por:

- (1) correo: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) fax: (833) 256-1665 o (202) 690-7442; o
- (3) correo electrónico: program.intake@usda.gov.

Areas of Civil Rights Compliance

The non-discrimination statement must be printed on all vital public material in accordance with the federal civil rights law and the USDA civil rights regulations and policies.

This means that the full Nondiscrimination Statement must be on:

- Application form(s)
- Notification of eligibility or ineligibility
- Notification of adverse action
- Program (Home) webpage (or a link to it)
 - You may provide a link to NDS for web based content, however, do not use the link to USDA NDS. Link to your website for NDS.
- Public information, including program literature

Nondiscrimination Statement (Short Version)

- **This institution is an equal opportunity provider**
- **Esta institución es un proveedor que ofrece igualdad de oportunidades. (Spanish)**
- *Can be used in special circumstances only
(Ask your state TEFAP representative for more information about this.)
- Translations available here:
 - [Nondiscrimination Statement | Food and Nutrition Service \(usda.gov\)](#)

Data Collection:

TEFAP is exempt from race and ethnic origin data collection, per [FNS Instruction 113-1 Appendix C, Section D, DATA COLLECTION AND REPORTING](#)

FNS INSTRUCTION 113-1
APPENDIX C

FOOD DISTRIBUTION

- **The Emergency Food Assistance Program (TEFAP)**
- Food Distribution Program on Indian Reservations (FDPIR)
- Commodity Supplemental Food Program (CSFP)
- Nutrition Assistance to Pacific Islands
- Food Assistance in Disasters and Situations of Distress

D DATA COLLECTION AND REPORTING (Section VI)

State agencies and local agencies or other subrecipients that operate FDPIR and CSFP must collect and maintain racial or ethnic data as specified below. **The other commodity programs listed under this Appendix are exempt from this requirement.**

Annual Training:

State agencies are responsible for training local agencies on an annual basis.

- Includes “frontline staff” and those who supervise frontline staff.
- New employees must receive Civil Rights training before participating in Program activities.
- Volunteers (if any) must also receive training appropriate for their roles and responsibilities.

Compliance Reviews:

- Examines the activities of State agencies, food banks, and local sites to determine Civil Rights compliance.
 - FNS Civil Rights reviews State agencies.
 - FNS staff and State agencies review food banks.
 - Food banks review their subrecipients/agencies.
 - Civil Rights compliance is assessed for all recipients of USDA funding.

(Reference: Compliance review as per FNS Instruction 113-1 and program-specific regulations and policies).

How to File a Program Discrimination Complaint

- To file a program discrimination complaint, use the IDHS forms available on-line: [IDHS: Forms \(state.il.us\)](http://IDHS:Forms(state.il.us)).
- Search 4530 to get a list of the form translations.
- Submit your completed form or letter to DHS.IEFP@illinois.gov

Search Forms

1. by Name/Number - in the "Form" field enter all or part of the form name or number.
2. by Division - choose the desired division from the "Division" field.
3. [Search Forms Help](#)
4. if 'CONVERT TO DOCUSIGN' is listed next to a form, this means the form can be processed through DocuSign. To use DocuSign please visit [DocuSign Forms](#).

Important! Please use *Adobe Acrobat or Reader* to open PDF forms. See [How to Open PDF Forms](#).

Form:

Division:

Language:

Results

- [IL444-4530 - THE EMERGENCY FOOD ASSISTANCE PROGRAM - CIVIL RIGHTS AND DISCRIMINATION COMPLAINT FORM.\(pdf\)](#) - (R-08-17)
- [IL444-4530 A - THE EMERGENCY FOOD ASSISTANCE PROGRAM - CIVIL RIGHTS AND DISCRIMINATION COMPLAINT FORM.\(ARABIC\).\(pdf\)](#) - (R-08-17)
- [IL444-4530 C - THE EMERGENCY FOOD ASSISTANCE PROGRAM - CIVIL RIGHTS AND DISCRIMINATION COMPLAINT FORM.\(CHINESE\).\(pdf\)](#) - (R-08-17)
- [IL444-4530 P - THE EMERGENCY FOOD ASSISTANCE PROGRAM - CIVIL RIGHTS AND DISCRIMINATION COMPLAINT FORM.\(POLISH\).\(pdf\)](#) - (R-08-17)
- [IL444-4530 R - THE EMERGENCY FOOD ASSISTANCE PROGRAM - CIVIL RIGHTS AND DISCRIMINATION COMPLAINT FORM.\(RUSSIAN\).\(pdf\)](#) - (R-08-17)
- [IL444-4530 S - EL PROGRAMA DE ASISTENCIA ALIMENTARIA DE EMERGENCIA - FORMULARIO PARA QUEJAS POR DISCRIMINACIÓN Y DERECHOS CIVILES.\(pdf\)](#) - (R-08-17)

Complaints of Discrimination

- Notify participants of the option to file a complaint with the USDA.
- Applicants and participants must file within 180 days of the alleged act of discrimination.
- Develop complaint forms (optional), but the use of such forms cannot be a pre-requisite for acceptance.
- Maintain Civil Rights complaints in a log separate from other program complaints.
- Confidentiality is extremely important and must be maintained.

Be prepared. When you are being reviewed, the following questions will be asked:

- Is the USDA Non-Discrimination poster displayed in a high traffic area? (And Justice for All poster)
- Is the Non-Discrimination statement included on all printed materials such as applications, pamphlets, forms, or any other program materials including websites?
- Are accommodations made to assist non-English speaking individuals? If yes, what methods are used?
- Is the Written Notice of Beneficiary Rights shared with participants?

Six Areas of Civil Rights Compliance

If there are civil rights findings:

- Steps must be taken immediately to obtain compliance.

Note: A finding's effective date is the date that you were notified of the finding and we (the State and you) must notify FNS in writing if there are any *significant findings*.



THANK YOU