

Civil Rights Training for Staff & Volunteers

- **Goals of Civil Rights** – fairness and equality of treatment and benefit delivery
- **Legal Prohibitions** – discrimination is prohibited 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.
- **Types of Discrimination** – Disparate treatment (intentional), disparate impact (neutral rule impacts disproportionately on a group), reprisal/retaliation against complainant or his/her family, associates or others involved in complaint process or exercising civil rights.
- **Exceptions** - Congress can establish a program that is intended for certain groups of people, and it is not discrimination to exclude those who do not meet eligibility requirements. For example, Congress can set age limits, and this is not age discrimination or disability discrimination for those who do not meet the age limits.
- **When do Civil Rights rules apply** – Civil rights training and practices are an expectation of partnership with Second Harvest Heartland. Civil rights rules also apply any time there is any federal financial assistance. Federal financial assistance is receiving anything of value from the federal government – not just cash. It can include commodities, training, equipment, and other goods and services.

Special Circumstances

- Make sure people with disabilities are accommodated. Sites should be accessible to people with all types of disabilities (e.g., mobility, sight, hearing, other) or alternate means of service delivery should be advertised and provided.
- Provide other language assistance to persons with limited English proficiency who could not gain meaningful access to the program without other language assistance. Assistance must always be provided to LEP households, but the level or type of assistance can vary based on circumstances.

Other Requirements

- TEFAP-authorized programs must display the USDA “And Justice for All...” non-discrimination poster in a place where it can be seen by all who visit the premises. This is a recommended practice for all other programs.
- TEFAP-authorized programs must include the [USDA non-discrimination statement](#) on all materials that mention USDA funded programs and make sure the statement is also on web sites that mention USDA funded programs.
- Treat all people with dignity and respect.

- Conduct outreach to insure that potentially eligible persons and households are aware of the program and have information on how to apply. Provide suggestions about how to make more people aware of the program and how to receive benefits.
- Maintain confidentiality. It is not appropriate to talk about who is receiving benefits and to make remarks about them. Never share information with others regardless of an expression of good intentions. Refer all requests for information to managers. What happens at the site stays at the site. The exception, of course, is any illegal or inappropriate behavior that should be reported to local, state or federal officials.
- Make sure individual data is kept confidential.
- Cooperate with State and Federal reviewers. They are required to conduct periodic compliance reviews to help insure that program and civil rights rules are being obeyed.
- If there is non-compliance, correction of problems and voluntary compliance is sought. Failure to abide by civil rights rules can lead to loss of Federal financial assistance or put partnership at risk.
- Sexual harassment is prohibited. Do not engage in or tolerate unwanted or unwelcome sexual behavior including jokes, touching, requests for sexual favors, etc. Report violations to management or to state or federal officials.
- Advise people who allege discrimination about how to file a complaint: If they wish to file a Civil Rights program complaint of discrimination, they may 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. They may also write a letter containing all of the information requested in the form. Send the completed complaint form or letter by mail to 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. Call (800) 845-6136 for Spanish.
- If conflicts occur, remain calm. Call for assistance immediately if you feel threatened. Consider mediation or a third party to help resolve the situation.
- Follow the platinum rule – treat people the way they would like to be treated!

Civil Rights Training must be provided to all staff and front-line volunteers on an annual basis. After reviewing this checklist, please have all individuals sign and date to document their training. Please keep the sign-in sheets on file at your organization to be referenced at any future site visits.

