

## Civil Rights Compliance in Food Distribution Programs for Volunteers

### The Emergency Food Assistance Program & Commodity Supplemental Food Program

- ❖ Civil Rights are the non-political rights of a citizen; the rights of personal liberty guaranteed to U.S. citizens by the 13<sup>th</sup> and 14<sup>th</sup> Amendments to the U.S. Constitution and by acts of Congress.
- ❖ Discrimination is the act of distinguishing one person or group of persons from others, either intentionally, by neglect, or by the effect of actions or lack of actions based on their protected classes.
- ❖ Protected classes are any person or group of people who have characteristics for which discrimination is prohibited based on a law, regulation, or executive order. Protected classes in TEFAP & CSFP are: race, color, national origin, age, sex and disability.
- ❖ Federal financial assistance is anything of value received from the Federal government such as: cash grants and loans, USDA food/commodities (TEFAP & CSFP), training and property donations.
- ❖ Goals of Civil Rights Legislation: Equal and consistent treatment for all eligible applicants and participants, knowledge of rights and responsibilities, elimination of illegal barriers that prevent or deter people from receiving food, and to provide dignity and respect for all.
- ❖ People receiving TEFAP & CSFP products have the right to fill out and submit a complaint. Complaints can be based on: race, color, age, sex, national origin and/or disability. Complaints may be given in writing or verbally. Complaint forms are available on the food bank's website.
- ❖ **Never discourage anyone from submitting a complaint.**
- ❖ Public notification requires recipient agencies to send out public notifications of their program to potentially eligible persons and must include the required full non-discrimination statement on all agency publications, websites, posters and informational materials, as well as information regarding a participant's right to file a complaint, how to file a complaint and the complaint procedures. That full statement is as follows:

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, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, 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](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:

mail: U.S. Department of Agriculture

Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;  
fax: (202) 690-7442; or  
email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

This institution is an equal opportunity provider.

- ❖ If the material is too small to permit the full statement to be included, the material will, at a minimum, include the following short statement, in print size no smaller than the text, **“USDA is an equal opportunity provider and employer.”** This language must be verbatim. Please note that the usage of the short statement is an “exception,” not the rule. For State and local agency-developed materials where the size and font of the document can be manipulated by the State or local agency, there is an expectation that efforts be made to include the full nondiscrimination statement. Also, regardless of the size, at a minimum, the full statement must be used on vital documents such as: (1) Application form; (2) Notification of Eligibility or Ineligibility; (3) Expiration of Certification Notification; and (4) Discontinuance Notification.
- ❖ Compliance reviews: The purpose of a compliance review is to determine if the applicant or recipient agency of Federal financial assistance is in compliance with Civil Rights requirements. Reviews include ensuring that agencies are prominently displaying an “And Justice For All” poster, providing annual civil rights training for staff and volunteers, have a procedure in place to handle Civil Rights complaints, have the non-discrimination statement printed on all materials and websites, are providing outreach materials to reach all eligible populations once every two years, and are meeting the requirements for persons with disabilities, reasonable accommodations, and limited English proficiency (LEP).
- ❖ Customer service makes a difference when you treat all people with dignity and respect, answer questions in a voice that is non-threatening, when you clearly explain to everyone the rules as well as their rights and responsibilities, learn to put yourself in their place when necessary, develop good listening skills and notice when a person feels they have been treated in a rude manner.
- ❖ Questions or concerns contact: Gina Kazerooni, Programs Administrator, Commodity Distribution Unit, (405) 521-6472 or Taryn Wade, State Reviewer, Commodity Distribution Unit, (405) 522-3144 or USDA Food and Nutrition Service, Southwest Region, Regional Civil Rights Director, (214) 290-9837.

By signing this training document, I hereby certify that I have read and understand its content.

\_\_\_\_\_  
Volunteer’s signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Pantry Director/Designee

\_\_\_\_\_  
Date

This double-sided training document can be utilized for volunteers who do not handle personal information and who may infrequently interact with program applicants, participants, or frontline staff because these type of volunteers must receive, at a minimum, limited civil rights training. Volunteers who do not interact in any way with program applicants and participants, and who do not handle personal information, do not require civil rights training.

Frontline volunteers must receive the full civil rights training during their initial orientation to the program and on an annual basis after the initial orientation. This document is not sufficient to meet their civil rights training requirements.