

# TEMPLATE

## Procedure: CSFP/TEFAP Civil Rights Procedure

Date: Updated August 25, 2024

### Policy

The Commodity Supplemental Food Program (CSFP) is a supplemental food assistance program for income eligible people over 60 years of age. The Emergency Food Assistance Program (TEFAP) is a supplemental food assistance program for income eligible individuals and families. Both are food assistance programs from the United States Department of Agriculture (USDA). All Civil Rights regulations and guidance from the USDA will be adhered to.

### General Information

CSFP and TEFAP must be made available to all eligible persons regardless of race, color, national origin, sex (including gender identity and sexual orientation), age, or disability, with the regulatory exception of CSFP – 60 years of age.

### Distribution Sites

All distribution sites will serve all persons regardless of race, color, national origin, sex (including gender identity and sexual orientation), age, or disability. Accommodations will be made as necessary for language assistance and adaptive needs.

### Notice of Beneficiary Rights

All CSFP applicants will be given the Notice of Beneficiary Rights. All TEFAP distributions will publicly display the Notice of Beneficiary Rights.

### Civil Rights Training

1. Civil Rights training is to be completed annually by all staff or volunteers involved in all levels of the TEFAP and/or CSFP distribution or who interact with program participants.
2. All staff and volunteers are to complete the online training from MDE on the Food Distribution website – [Civil Rights Training for Household Commodity Distribution - Overview | Rise 360 \(articulate.com\)](#) during the month of September. Copies of training completion emails are to be kept on file in the program manager's office.
3. All new food distribution employees and volunteers are to complete the MDE training upon hire.

### Day of Distribution - Civil Rights Training

Some of our distribution sites are large enough that we have groups of volunteers who come and help just for the day. In these cases, the site manager will review the "Distribution Day" Civil Rights training with the one-day volunteers. The volunteers will collectively sign a dated copy of the attached training. It will be stored in the program manager's office.

### USDA Nondiscrimination Statement

The most current long version of the USDA nondiscrimination statement will always be posted when applying for program benefits and during distribution. It is also posted on the food programs page of the agency website.

The short version of the USDA nondiscrimination statement will be included on all program materials including but not limited to, flyers, distribution schedules, and nutrition education.

### **And Justice for All Poster**

The current And Justice for All poster will be prominently displayed at all sites during certification and distribution. Laminated copies will be made available to all sites.

### **Limited English Proficiency Plan**

According to the latest Census data, our county has many Spanish speaking residents. As such, our Agency will provide translated copies of all food distribution materials, including but not limited to – self declaration forms, CSFP applications, distribution schedules, and nutrition education.

In the main office, we have two Spanish translators who can help with intake and food choice as necessary. These two translators will also be a resource for all distribution sites. Their direct office line numbers are found in the site procedures.

The program manager will work with the agency officer to review census data for the service area on an annual basis during August. If there is a population of limited English speakers of 5% or more, program materials will be translated, and information will be distributed to local organizations.

Each site will provide its own list of translators if they have them. Each distribution site will have I Speak Language Statements for helping to identify language needs. If there are no translators on site and it is Spanish that is needed, the site can call the main office. If it is a different language, the site can either use Google Translate or call 1-800-translate for assistance.

Children are never to be used as translators in matters of participant intake and/or benefit issuances.

### **Civil Rights Complaints**

All Civil Rights complaints will be directed to the program manager who will follow up with the participant and provide them with information on filing a complaint. Civil Rights complaints are to be filed by downloading a form from the USDA Civil Rights website or by calling 866-632-9992 to request the complaint form.

### **Attachments**

- Day of Distribution Training Sheet
- USDA nondiscrimination statement
- I Speak Language Identification Cards
- Notice of Beneficiary Rights – Participant and Site