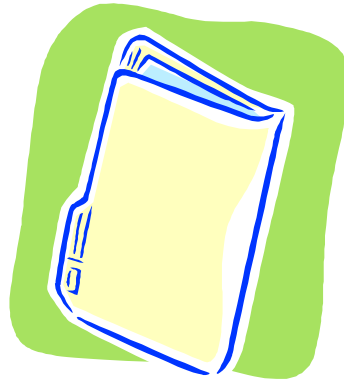


THE BASICS

Your program is required to:

1. Participate in mandatory annual civil rights training;
2. Have an outreach strategy in place that touches all populations in your service area;
3. Maintain a file with samples of all outreach materials containing the nondiscrimination statement;
4. Have an LEP plan in place that all staff and volunteers are aware of;
5. Post all "Justice for All" poster and information on how to make a complaint;
6. Forward all discrimination complaints to FHCO's complaint hotline or your RFB and assist in follow-up by relevant agencies;
7. Address/acknowledge all complaints and assist complainant if necessary;
8. Maintain a file of all complaints received.



I fully understand my responsibilities to recipients of emergency food at our pantry and their Civil Rights.

Signature _____

Date: _____

Nondiscrimination Statement

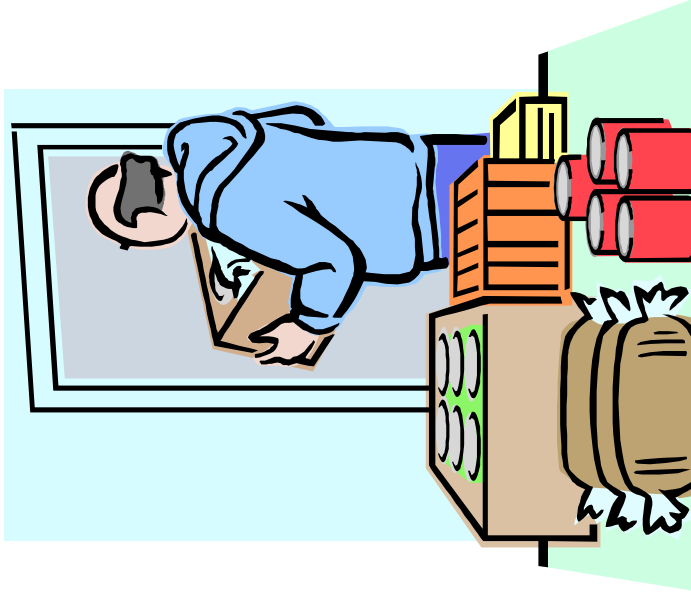
"In accordance with Federal law, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, religion, political beliefs or disability."

"USDA is an equal opportunity provider and employer."

To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (202) 720-5964 (voice and TDD).



Legal Authorities: with Title VI of the Civil Rights Act of 1964 (P.L. 88-352), Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973 (P.L. 93-112), Age Discrimination Act of 1975 (P.L. 94-135), and all requirements imposed by the regulations of the Department of Agriculture (7CFR Part 15), Department of Justice (28 CFR Parts 42 and 50), and FNS directives or regulations



Oregon Food Bank and the Fair Housing
Council of Oregon present

CIVIL RIGHTS TRAINING FOR EMERGENCY FOOD BOX PANTRIES

The overall objective of civil rights training is to protect the rights of employees, applicants, and persons who participate in various programs in compliance with applicable civil rights laws and regulations.

As a staff person (or volunteer) of an Oregon Food Bank program distributing federal commodities, you must agree to provide equal and consistent treatment to all applicants and beneficiaries (clients).

Protected classes for Food Bank programs are:

- Race
- Age
- Sex
- Disability
- National Origin or Ethnicity
- Religion
- Political Affiliation
- Military Status
- Familial Status
- Marital Status
- Sexual Orientation/Gender Identity

Discrimination based on any of these protected classes is prohibited. Types of discrimination include:

Differential Treatment:

i.e. refusal of service, using different eligibility criteria for certain clients, treating applicants different based on protected class.

Discriminatory Impact:

Discrimination that is not intentional, but has that effect. A rule, policy or practice may be neutral on its surface, but it impacts a protected class disproportionately.

Best Practices

- Be aware of your own personal assumptions and do your best to keep them to yourself when working with clients.
- In general, try to accommodate special dietary needs (diabetes, food allergies, etc.) and religious requirements (Kosher or Halal foods).
- Be prepared to provide program information in alternate formats for people with disabilities (i.e. reading materials out loud for visually impaired, etc.)

Tips for Religious Organizations:

- Proselytizing is not allowed.
- Be aware of actions/comments that could have a chilling effect or create a barrier to service.
- Sharing information about religious programs is fine, but don't make it seem like clients must participate in order to receive food (i.e. prayer service before meals)

Public Notification: Outreach

All programs must have a public outreach plan to inform participants and potentially eligible persons of the program availability, program rights and responsibilities, the policy of nondiscrimination, and the procedure for filing a complaint. Outreach needs to touch all populations in your service area.

- Forms of Communication: Brochures, bulletins, leaflets, letters, newspapers, radio/television announcements.
- All forms of communication must include the nondiscrimination statement (see the back of this brochure for examples)
- Provide appropriate translation of information to pertinent participants.
- Advise public, including minorities and grassroots organizations in the service delivery area, of program availability and eligibility standards.
- Display "Justice for All" poster and Eligibility Questions poster in prominent area.

Limited English Proficiency (LEP)

If a program receives any federal assistance (USDA commodities), they need to have a plan to serve those with "limited English proficiency."

Primary Factors to Consider:

- Number of LEP persons in your service area
- Frequency with which LEP individuals come in contact with the program
- Importance of service provided by the program
- Resources available to the recipient

Develop an LEP plan:

Your plan should include strategies for providing translation of critical documents and interpretation through:

- Staff or volunteers
- Contracts or informal community relationships
- Language line

All staff and volunteers need to be up to speed on the plan.

Keep your plan on file

Evaluate and update your plan periodically

If you need assistance in creating an LEP plan you can contact your RFB for more information and/or visit

www.lep.gov.

Civil Rights Complaints

Civil rights complaints are characterized by the complainant verbalizing or submitting in writing a complaint that alleges that they have been treated unfairly on the basis of their membership in a protected class.

Filing of complaints

All staff/volunteers should know how to handle a discrimination complaint

- People have the legal right to file a discrimination complaint without retaliation—agency staff cannot refuse to assist with a complaint or create barriers
 - Agency staff must be willing to assist in complaint resolution.
 - Agencies must keep proper records of all complaints.
- Note that clients have 180 days from the alleged discriminatory action to file a complaint.

Complaint Process

Clients who wish to make a complaint can call Fair Housing Council of Oregon's Civil Rights Hotline (888)-772-6008 or complete a complaint form to be sent to your RFB. It is your responsibility to post Hotline tear-off sheets with your Justice for All poster. Contact your RFB about getting tear-off sheets.

The written complaint should include:

- Name, address and phone number— or other means of contacting- the person alleging discrimination
- Location and name of organization accused of discrimination
- Basis of alleged discrimination (race, age, etc.)
- Nature of incident that led person to allege discrimination

Once made, the complaint will be investigated by Oregon Food Bank or the Fair Housing Council of Oregon, the State of Oregon Civil Rights Division and/or the USDA Office of Civil Rights. Investigation involves a review and evaluation of the facts. The complainant will be informed of the decision or consulted about the resolution and can appeal the decision if they choose.

These are legal responsibilities. Taken to an extreme a complaint could become a lawsuit based on a claim of the violation of a person's civil rights.