



**Nicollet County Health and Human Services
622 South Front Street
St. Peter, MN 56082**

**COMPREHENSIVE CIVIL RIGHTS PLAN (CCRP)
Effective Date: January, 2019**

**Civil Rights/Americans with Disabilities Act/
Limited English Proficiency Coordinator
Contact Person: Cassandra Sassenberg, Director
Phone: (507) 934-8573
Fax: (507) 934-8552
Relay Number: 1-800-627-3529
Email: Cassandra.sassenberg@co.nicollet.mn.us**

**Posting: Main lobbies
622 South Front Street, St. Peter, MN 56082
2070 Howard Drive W, North Mankato, MN 56003**

This information is available in accessible formats to individuals with disabilities and for information about equal access to services, write to dhs.equalopportunity@state.mn.us, or call (651) 431-3040 or TTY users place call through 1-800-627-3529

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A. Purpose of Plan

As a recipient of federal financial assistance, Nicollet County Health and Human Services is responsible for providing core services to assist and support Minnesota's most vulnerable individuals and families so they can meet their basic needs and be treated with respect and dignity. Nicollet County has a Comprehensive Civil Rights Plan to ensure that all eligible individuals receive equal access to program services and information. Its programs are operated in a nondiscriminatory way, without regard to race, color, national origin, age, disability, sex, sexual orientation, religion, political beliefs, creed and public assistance status. In medical programs, sex includes sex stereotypes and gender identity under any health program or activity receiving federal funds. The Comprehensive Civil Rights Plan also serves as a source of information for county agency staff and the general public. The plan sets out Nicollet County Health and Human Service's civil rights administrative policies and procedures, identifying key contacts within the agency and linking the reader to applicable state and federal civil rights laws and resources.

B. Legal Authorities

Federal

1. Title VI of the Civil Rights Act of 1964 (race, color, national origin)
2. Section 504 of the Rehabilitation Act of 1973 (disability)
3. Section 508 of the Rehabilitation Act of 1973 (disability)
4. Title II of the Americans with Disabilities Act of 1990; State and local government services (disability)
5. Age Discrimination Act of 1975 (age)
6. Community Service Assurance Provisions of the Hill-Burton Act (health facilities receiving Hill-Burton Funds)
7. Section 1557 of the Patient Protection and Affordable Care Act (added sex discrimination in health care programs)
8. Nondiscrimination Provisions of the Omnibus Budget Reconciliation Act of 1981 (Federal Block Grants):
 - Community Services Block Grant (race, color, national origin, sex) Remaining block grants (race, color, national origin, age, disability, sex, religion)
 - Social Services Block Grant
 - Maternal and Child Health Services Block Grant
 - Projects for Assistance in Transition from Homelessness Block Grant
 - Preventive Health and Health Services Block Grant
 - Community Mental Health Services Block Grant
 - Substance Abuse Prevention and Treatment Block Grant
9. Title IX of the Education Amendments of 1972 (sex)
10. Family Violence Prevention and Services Act (race, color, national origin, age, disability, sex, religion)
11. Food Stamp Act of 1977 [As Amended Through P.L. 108-269, 2004]
12. Nondiscrimination Compliance Requirements in the Food Stamp Program, Food and Nutrition Service, U.S. Department of Agriculture
13. Bilingual Requirements in the Food Stamp Program, Food and Nutrition Service, U.S. Department of Agriculture
14. FNS Instruction 113-1, Civil Rights Compliance and Enforcement – Nutrition Programs and Activities, Food and Nutrition Service, U.S. Department of Agriculture (2005)
15. Equal Opportunity for Religious Organizations in USDA Regulation

State

Minnesota Human Rights Act, Chapter 363A

C. Civil Rights Contact

Nicollet County Health and Human Services designates Cassandra Sassenberg, Director, to serve as the agency's Civil Rights Contact, agency point person on civil rights matters.

Cassandra Sassenberg, Director

Phone: (507) 934-8573

Fax: (507) 934-8552

Relay Number: 1-800-627-3529

Email: Cassandra.Sassenberg@co.nicollet.mn.us

D. Nicollet County Health and Human Services' Equal Opportunity Policy and Procedure

It is the policy of Nicollet County Health and Human Services to make sure that program benefits and services are available to everyone and provided to all eligible individuals without discrimination, in compliance with civil rights laws.

Nicollet County Health and Human Services' employees, services, programs, benefits and policies will not discriminate against applicants, clients or members of the public because of race, color, national origin, sex, sexual orientation, age, creed, religion, political beliefs, disability or public assistance status. "Sex" includes sex stereotypes and gender identity under any medical or health program receiving federal financial assistance, such as Medical Assistance, CHIP programs, health clinics, insurance companies and state health insurance exchanges.

This policy covers Nicollet County Health and Human Services' full range of services, programs and benefits, including, but not limited to, access to information about services, eligibility determinations and intake, admission procedures and treatment. The policy applies to the agencies and providers receiving federal and state funds under contracts, licenses and other arrangements with Nicollet County Health and Human Services. The Minnesota Human Rights Act also applies to the work of Nicollet County Health and Human Services and those agencies carrying out its programs.

Program Accessibility for People with Disabilities

Nicollet County Health and Human Services and all of its services, programs and benefits, are accessible to and usable by people with disabilities, including people with hearing loss, low vision and other sensory disabilities.

To avoid disability discrimination, Nicollet County Health and Human Services will:

- Notify the public about rights and protections for people with disabilities under the Americans with Disabilities Act
- Designate an ADA Contact and maintain a complaint procedure

- Make sure that its buildings are physically accessible for people with disabilities
- Assist individuals with disabilities to apply and qualify for benefits based on their eligibility
- Provide appropriate auxiliary aids and services, including accessible formats, to ensure effective communication with people with disabilities
- Provide services, programs and benefits that are accessible to and usable by qualified people with disabilities

Physical access includes:

- Convenient off-street parking designated specifically for people with disabilities
- Curb cuts and ramps between parking areas and the Nicollet County Health and Human Services' building
- Level access into the first floor of the Nicollet County Health and Human Services' building with elevator access to all other floors

Reasonable Modifications to Policies, Procedures or Practices

Nicollet County Health and Human Services will make reasonable modifications to its policies, procedures or practices when necessary to avoid discrimination on the basis of disability, unless Nicollet County Health and Human Services can demonstrate that making the modifications would fundamentally alter the nature of the services, programs or benefits.

Effective Communication and Auxiliary Aids and Services

Nicollet County Health and Human Services will take appropriate steps to ensure that communications with people with disabilities and companions with disabilities are as effective as communications with others. To ensure effective communications, Nicollet County Health and Human Services will provide appropriate auxiliary aids and services, including accessible formats, so that people with disabilities can receive services, programs and benefits and participate in them in the same way as people without disabilities. Auxiliary aids and services include qualified readers, writers and interpreters who convey information effectively, accurately and impartially using any necessary specialized vocabulary.

To determine what types of auxiliary aids or services are necessary, Nicollet County Health and Human Services will give primary consideration to the requests of people with disabilities. Nicollet County Health and Human Services will honor the choice of the person requesting the auxiliary aid or service unless it would fundamentally alter the nature of the service, program or benefit or cause an undue administrative or financial burden. If this happens, Nicollet County Health and Human Services will find another equally effective auxiliary aid or service.

E. Referral Complaint Resolution Procedure

Nicollet County Health and Human Services' Complaint Procedure

You have the right to file a discrimination complaint with Nicollet County Health and Human Services if you believe you have been treated in a discriminatory way. It is against the law for any human services agency to discriminate against applicants, clients or members of the public because of race, color, national origin, creed, religion, sexual orientation, public assistance status, age, disability or sex (including sex stereotypes and gender identity under any health program or activity receiving federal financial assistance).

Nicollet County Health and Human Services will refer all civil rights complaints to the Minnesota Department of Human Services (DHS). Complaints must be in writing unless you need special help. Contact our office or contact DHS directly through its Civil Rights Coordinator to get the complaint forms.

Cassandra Sassenberg
Nicollet County Health and Human Services
622 South Front Street
St Peter MN 56082
(507) 934-8573 (voice)
(507) 934-8552 (fax)
Relay Number: 1-800-627-3529
Cassandra.Sassenberg@co.nicollet.mn.us

Or contact:

DHS Civil Rights Coordinator
Minnesota Department of Human Services
Office of Equal Opportunity
P O Box 64997
St. Paul, MN 55164-0997
651-433-3040 (Voice) or use your preferred relay service
651-431-7444 (Fax)

You also have the right to file a discrimination complaint directly with the Minnesota Department of Human Rights, and the federal agencies that operate the benefits programs.

The **Minnesota Department of Human Rights** prohibits discrimination in public services programs because of race, color, national origin, creed, religion, disability, sex, sexual orientation, or public assistance status. Contact the agency directly:

Minnesota Department of Human Rights
Freeman Building, 625 North Robert Street
St. Paul, MN 55155
651-539-1100 (Voice)
800-657-3704 (Toll Free)
711 or 800-627-3529 (MN Relay)

The **U.S. Department of Health and Human Services' Office for Civil Rights** prohibits discrimination in its programs because of race, color, national origin, age, disability, religion and sex (including sex stereotypes and gender identity under any health program or activity receiving federal financial assistance). Contact the agency directly:

U.S. Department of Health and Human Services
Office for Civil Rights, Region V
233 North Michigan Avenue
Suite 240
Chicago, IL 60601
312-886-2359 (Voice)
800-368-1019 (Toll Free)
800-537-7697 (TTY)

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, religious creed, disability, age, political beliefs, 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, 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:

- (1) Mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410
- (2) Fax: (202) 690-7442; or
- (3) Email: program.intake@usda.gov.

This institution is an equal opportunity provider.

F. Complaint Notification Form

Nicollet County Health and Human Services will use the *Complaint Notification Form* to notify DHS in writing of all service delivery discrimination complaints filed against Nicollet County Health and Human Services and resolved on the county agency level. Nicollet County Health and Human Services will make sure the complaint notification form is completed and sent to DHS within 90 days of the date the complaint was filed in the county, so DHS can report the complaint to the appropriate federal office. A copy of the *Complaint Notification Form* is located in the Appendix; Attachment 1.

G. Disability Compliance

1. Disability Law and Standard of Access for State and Local Government Services:

Section 504 of the Rehabilitation Act of 1973 protects qualified individuals with disabilities from discrimination based on their disability in federally funded programs and services.

Title II of the Americans with Disabilities Act of 1990 (Title II of the ADA) protects qualified individuals with disabilities from discrimination on the basis of their disability when the discrimination occurs in state or local government services. An agency does not have to receive federal financial assistance to be required to comply with Title II of the ADA. An agency just has to be a state or local government entity.

County human services agencies must ensure that people with disabilities are able to use their programs and services. Disability laws set out an equal access standard for providing services. This means that individuals with disabilities are entitled to equal access to human services programs; the same standard of access that applies to people without disabilities.

A public agency must reasonably modify its policies, procedures and practices to avoid discrimination. A public agency must also take appropriate steps to ensure that its communications with individuals with disabilities are as effective as communications with others.

2. ADA Contact

a. Title II of the ADA protects qualified individuals with disabilities from discrimination on the basis of disability in the services, program, or activities of all state and local governments. Additionally, the ADA extends the prohibition of discrimination on the basis of disability, established by Section 504 of the Rehabilitation Act, to all activities of state and local governments, including those that do not receive federal financial assistance.

b. The Nicollet County Health and Human Services ADA Contact is:

Cassandra Sassenberg
Nicollet County Health and Human Services
622 South Front Street
St Peter MN 56082
(507) 934-8573 (voice)
(507) 934-8552 (fax)
Cassandra.Sassenberg@co.nicollet.mn.us

c. Disability Complaints

People filing disability complaints will use Nicollet County Health and Human Services civil rights complaint procedure.

d. ADA Notice Document

Nicollet County Health and Human Services will use the DHS brochure: *Do you have a disability* (DHS-4133-ENG) as its ADA notice document. This notice document informs applicants, clients and members of the public that Nicollet County Health and Human Services does not discriminate on the basis of disability. The notice document also gives information to the public about the rights of people with disabilities under the Americans with Disabilities Act.

Nicollet County Health and Human Services has a copy of DHS brochure: *Do you have a disability* (DHS-4133-ENG) posted in the lobby next to the reception desk.

A copy of the DHS brochure: *Do you have a disability* (DHS-4133-ENG) is located in the Appendix as Attachment C.

e. Disability Policy Prohibiting Discrimination

The Nicollet County Health and Human Services Equal Opportunity Policy and Procedure includes provisions which prohibit disability discrimination in human services programs. This policy is located in the agency lobby.

H. Limited English Proficiency Plan

See Attachment 3.

I. Annual Civil Rights Training for the Supplemental Nutrition Assistance Program (SNAP)

Nicollet County Health and Human Services will conduct annual SNAP civil rights training for all staff who administer the SNAP program and all staff who have direct contact with the public, such as support staff, supervisors and managers.

Nicollet County Health and Human Services will use DHS' PowerPoint presentation to train staff, document the date of the training each year and document who attends the training.

J. Civil Rights Assurance of Compliance

The Nicollet County Health and Human Services director and county attorney representative have signed the *2016 Civil Rights Assurance of Compliance*. A copy is located in the Appendix; Attachment 4.

K. CCRP Administration

Nicollet County Health and Human Services will:

Nicollet County Health and Human Services has, as part of its Civil Rights Compliance Plan, incorporated the use of the American Disability Act brochure that provides required disability rights information for the public. This brochure is included in all rights and responsibilities information packets distributed to applicants and clients. The brochure can be located at both locations in the lobby and employee breakrooms: 622 South Front Street, St. Peter, MN 56082 & 2070 Howard Drive W, North Mankato, MN 56003

Post a copy of its CCRP in the agency lobby where members of the public can review it and in the employee breakroom where staff can review it

Post the CCRP on the agency's public website
Review the CCRP annually with ALL staff

For the benefit of applicants, clients and members of the public, prominently post in the lobby a copy of the equal opportunity policy and procedure that includes provisions prohibiting disability discrimination and a copy of its civil rights complaint procedure

Post a copy of the DHS brochure: *Do you have a disability* (DHS-4133-ENG) in the lobby next to the reception desk

Conduct annual SNAP civil rights training for all staff who administer the SNAP program and all staff who have direct contact with the public including support staff, supervisors, and managers. Nicollet County Health and Human Services will document the date of the training each year and document who attends the training.

L. Appendix

1. Attachment A: Civil Rights Complaint Form: DHS-2807
2. Attachment B: DHS-4133 Do You Have a Disability Brochure
3. Attachment C: Nicollet County Health and Human Services Limited English Proficiency Plan
4. Attachment D: 2016 Civil Rights Assurance Agreement