

Human Services and Public Health Comprehensive Civil Rights Plan

Civil Rights Contact

Brian Morrissey

Office: 612-348-4766 (voice) or 7-1-1 (MN Relay Service)

Brian.Morrissey@hennepin.us

Americans with Disabilities Act Coordinator/Contact

Tracey Lor

Office: 612-543-4015 or 7-1-1 (MN Relay Service)

Tracey.Lor@hennepin.us

Limited English Proficiency Contact

Jillian Kyles

Office: 612-348-8547 (voice) or 7-1-1 (MN Relay Service)

Jillian.Kyles@hennepin.us

Print copies of this Comprehensive Civil Rights Plan are posted for review at all Hennepin County service center locations (see page 12 below for list of service center locations). An electronic copy of this Comprehensive Civil Rights Plan is available on Hennepin County's public website at HennepinCounty.gov, as well as the Hennepin County Human Services and Public Health intranet (SharePoint) page, which is available to all county staff.

For accessible formats of this publication or assistance with equal access to human services, contact Hennepin County's Americans with Disabilities Act coordinator, Caron Battle, at Caron.Battle@hennepin.us, 612-348-7741 (voice), 612-348-5467 (TTY), or 7-1-1- (MN Relay Service).

Hennepin County Human Services and Public Health
300 South Sixth Street, Minneapolis, MN 55487
612-348-4111 (voice) or 7-1-1 (MN Relay Service)
612-348-8228 HennepinCounty.gov



Contents

Human Services and Public Health Comprehensive Civil Rights Plan _____	1
Civil Rights Contact _____	1
Americans with Disabilities Act Coordinator/Contact _____	1
Limited English Proficiency Contact _____	1
Purpose Statement _____	3
Equal Opportunity Policy _____	4
Program Accessibility Policy for People with Disabilities _____	5
Physical access includes: _____	5
Reasonable Modifications to Policies, Procedures, or Practices _____	5
Effective Communication and Auxiliary Aids and Services _____	5
Limited English Proficiency Plan _____	6
Civil rights complaint resolution procedure _____	7
Civil Rights Complaint Procedure: _____	7
Comprehensive Civil Rights Plan Administration _____	11
Attachment A _____	12
Legal Authorities _____	12
Federal _____	12
State _____	12
Attachment B _____	13
Packet Cover Letter _____	13
Attachment C _____	14
Civil Rights Complaint Form: Policy Violation in Service Delivery _____	14
Attachment D _____	15
Complaint Notification Form for Complaints Alleging Discrimination in Service Delivery _____	15
Attachment E _____	17
Americans with Disabilities Act (ADA) _____	17
Attachment F _____	18
Limited English Proficiency Plan _____	18
Attachment G _____	19

Purpose Statement

As a recipient of federal financial assistance, Hennepin County Human Services and Public Health (HSPH) 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. HSPH has a comprehensive civil rights plan to ensure that all eligible individuals receive equal access to program services and information. HSPH's 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 civil rights plan also serves as a source of information for HSPH staff and the public. The plan sets out HSPH'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.

Equal Opportunity Policy

It is the policy of the Hennepin County Human Services and Public Health (HSPH) 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.

HSPH 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 exchanges.

This policy covers HSPH's 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. This policy applies to the agencies and providers receiving federal and state funds under contracts, licenses, and other arrangements with HSPH. The Minnesota Human Rights Act also applies to the work of HSPH and those agencies carrying out the work of HSPH.

Program Accessibility Policy for People with Disabilities

The Hennepin County Human Services and Public Health (HSPH) and all 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, HSPH will:

- Notify the public about the rights and protections for people with disabilities under the Americans with Disabilities Act (ADA).
- Designate an ADA Coordinator 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 approximate 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 HSPH buildings.
- Level access into the first floor of HSPH buildings with elevator access to all other floors.

Reasonable Modifications to Policies, Procedures, or Practices

HSPH will make reasonable modifications to its policies, procedures, or practices when necessary to avoid discrimination based on disability, unless HSPH can demonstrate that making the modifications would fundamentally alter the nature of services, programs or benefits.

Effective Communication and Auxiliary Aids and Services

- HSPH 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, HSPH 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, HSPH will give primary consideration to the requests of people with disabilities. HSPH 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, HSPH will find another equally effective auxiliary aid or service.

Limited English Proficiency Plan

Hennepin County has a Limited English Proficiency Plan (updated 2025), which is included as a separate Attachment to this Comprehensive Civil Rights Plan.

Civil rights complaint resolution procedure

You have the right to equal access to services, if you are an applicant, client or member of the public trying to gain access to human services program information or benefits. Hennepin County Human Services and Public Health (HSPH) has a civil rights complaint procedure that provides prompt and thorough resolution of civil rights complaints.

A civil rights complaint should allege discrimination of some kind. You have a right to file a civil rights complaint if you believe you have been discriminated against because of your race, color, national origin, sex, sexual orientation, age, creed, religion, political beliefs, disability, or public assistance status. Sex includes sex stereotypes and gender identity discrimination that occurs in medical or health programs and clinics receiving federal financial assistance, such as Medical Assistance, MNCare, CHIP programs and insurance companies and state health insurance exchanges.

It is against the law for anyone who works for HSPH to retaliate against a person who files a complaint or who cooperates in the investigation of a civil rights complaint. The law and regulations prohibiting discrimination can be viewed at the office of the Civil Rights Contact.

To file a complaint, ask for HSPH's Civil Rights Complaint Packet, which consists of the following:

- Civil Rights Complaint Packet Cover Letter (Attachment B to this Plan)
- Equal Opportunity Policy (included above)
- Program Accessibility Policy for People with Disabilities (included above)
- Civil Rights Complaint Resolution Procedure (included below)
- Civil Rights Complaint Form (Attachment C to this Plan)

You may ask any HSPH employee for a copy of HSPH's Civil Rights Complaint Packet, or you may contact the Civil Rights Contact for a copy of the Packet.

Contact the Civil Rights Contact below to file a complaint.

HSPH Civil Rights Contact
Brian Morrissey
300 South Sixth Street MC 971
Minneapolis, MN 55487-0233
612-348-4766 (voice) or 7-1-1 (MN Relay Service)
Brian.Morrissey@hennepin.us (Email)

Civil Rights Complaint Procedure:

1. Civil rights complaints **must** be submitted to the Civil Rights Contact within 180 days of the date the alleged discrimination occurred.

2. A complaint must be in writing. You may use the Civil Rights Complaint Form, although it is not required. Your complaint must contain your name and address. Other contact information is also helpful, like a telephone number, relay number and email address. The written complaint must state the alleged problem or action and what you would like to see happen. Other details, like the date, time, and place that the alleged problem or action occurred are also helpful. Sign and date the complaint. If you need assistance with your complaint, the Civil Rights Contact will help you.
3. HSPH will investigate the complaint. The investigation may be informal, but it will be thorough and timely. People who have an interest in the complaint will have an opportunity to submit relevant evidence about the complaint. HSPH will issue a written decision on the complaint within one-hundred twenty (120) days after its filing. Investigations regarding most complaints will be completed within sixty (60) days of their filing. HSPH will maintain the complaint records and files for three years. Complaints about program rules are not civil rights complaints and will be resolved through a different complaint process.
4. If you are not satisfied with the decision, you may ask the Human Services Director to review it. You must ask for this review within fifteen (15) days of receiving the decision. To ask the Human Services Director to review a decision, you must submit your request, in writing, to the Civil Rights Contact, including the reasons you disagree with the decision. The Civil Rights Contact will then forward your written submission and all necessary information to the Human Services Director. The Human Services Director will issue a written decision within thirty (30) days of the date the Civil Rights Contact receives your written request for review. If you are not satisfied with the decision of the Human Services Director, you may ask the County Administrator to review it. You must ask for this review within fifteen (15) days of receiving the decision of the Human Services Director. To ask the County Administrator to review a decision, you must submit your request, in writing, to the Civil Rights Contact, including the reasons you disagree with the decision. The Civil Rights Contact will then forward your written submission and all necessary information to the County Administrator. The County Administrator will issue a written decision within thirty (30) days of the date the Civil Rights Contact receives your written request for review. The decision of the County Administrator is final. This appeal process is not the same as filing a fair hearings appeal with the DHS Appeals and Regulations Division.
5. HSPH will notify the Civil Rights Coordinator at the Minnesota Department of Human Services within 90 days of all civil rights complaints filed against it.
6. You can also file a discrimination complaint directly with the U.S. Department of Health and Human Services' Office for Civil Rights or the U.S. Department of Agriculture (USDA) for the Supplemental Nutrition Assistance Program (SNAP).

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, sex and religion. Sex includes sex stereotypes and gender identity discrimination that occurs in

medical or health programs and clinics receiving federal financial assistance; these are programs, such as Medicaid, CHIP programs and insurance companies and state health insurance exchanges under Title I of the Affordable Care Act. Contact the federal agency directly:

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

In accordance with Federal civil rights law and 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 required 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
Director, Center for Civil Rights Enforcement
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- 2) fax: (202) 690-7442; or
- 3) email: program.intake@usda.gov

7. You may file a complaint directly with the Minnesota Department of Human Rights or the Minnesota Department of Human Services.

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

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

8. The Minnesota Department of Human Services prohibits discrimination in its programs because of race, color, national origin, creed, religion, sexual orientation, public assistance status, age, disability, or sex, including sex stereotypes and gender identity discrimination that occurs in health programs or activities receiving federal financial assistance, such as Medical Assistance, MNCare, CHIP programs and insurance companies and state health insurance exchanges. Contact the Equal Opportunity and Access Division directly only if you have a discrimination complaint:

Minnesota Department of Human Services
Equal Opportunity and Access Division
P.O. Box 64997
St. Paul, MN 55164-0997
651-431-3040 (voice) or use your preferred relay service

9. County agencies are not permitted to investigate civil rights complaints in the Supplemental Nutrition Assistance Program (SNAP) because counties directly administer SNAP benefits. County agencies must refer SNAP civil rights complaints to DHS or the USDA regional office in Chicago. The USDA regional address is:

Civil Rights Director
Midwest Regional Office
USDA/Food and Nutrition Service
77 W. Jackson Blvd., 20th Floor
Chicago, IL 60604-3591
(312) 353-6657 (voice) or use your preferred relay service

10. HSPH will make appropriate arrangements to ensure that people with disabilities are provided reasonable modifications or effective communications, if needed, to participate in the complaint process. Reasonable modifications or effective communications include, but are not limited to, providing interpreters for people who are deaf or hard-of-hearing; providing taped cassettes and accessible formats for people who are blind or have low vision; and assuring a physically accessible location for complaint proceedings. The Civil Rights Contact is responsible for working with people who file complaints to make appropriate arrangements.

Comprehensive Civil Rights Plan Administration

Print copies of this Hennepin County Human Services and Public Health (HSPH) Comprehensive Civil Rights Plan (Plan) are posted for review in the following locations, which are accessible to applicants, clients, member of the public, employees, volunteers, and contractors:

- HSPH Northwest Suburban Human Services Center Lobby 7051 Brooklyn Blvd Brooklyn Center 55429
- HSPH South Suburban Human Services Center Lobby VEAP Community Service Center 9600 Aldrich Avenue South Bloomington, MN 55420
- HSPH North Minneapolis Human Services Center Lobby 1001 Plymouth Ave North Minneapolis, MN 55411
- HSPH West Suburban Human Services Center Lobby 1011 First Street South, Suite 108 Hopkins, MN 55343
- HSPH South Minneapolis Human Services Center Lobby 2215 East Lake Street Minneapolis, MN 55407
- HSPH Central / Northeast Minneapolis Human Services Center Lobby 525 Portland Avenue South Minneapolis, MN 55415

An electronic copy of this Plan is available on Hennepin County's public website at HennepinCounty.gov as well as the Hennepin County Human Services and Public Health intranet (SharePoint) page, which is available to all County staff.

The Plan will be reviewed annually with all department staff via unit meetings and through a news article in the electronic employee newsletter.

The Americans with Disabilities Act Notice Document (Attachment E to this plan) is currently posted in all HSPH Human Service Center lobbies as well as in other department sites that serve the public. This will continue to be HSPH practice in the future.

Attachment A

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 Amendment 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 Services 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

1. Minnesota Human Rights Act, Chapter 363A

Attachment B

Packet Cover Letter

You have the right to equal access to services, if you are an applicant, client or member of the public trying to gain access to human services program information or benefits. The Hennepin County Human Services and Public Health (HSPH) has a civil rights complaint procedure that provides prompt and thorough resolution of civil rights complaints.

Civil rights complaints allege discrimination. You have a right to file a civil rights complaint if you believe you have been discriminated against because of your race, color, national origin, sex, sexual orientation, age, creed, religion, political beliefs, disability, or public assistance status. Sex includes sex stereotypes and gender identity discrimination that occurs in medical or health programs and clinics receiving federal financial assistance, such as Medical Assistance, MNCare, CHIP programs and insurance companies and state health insurance exchanges.

It is against the law for anyone who works for HSPH to retaliate against a person who files a complaint or who cooperates in the investigation of a civil rights complaint.

The law and regulations prohibiting discrimination can be viewed at the office of the Civil Rights Contact.

You are receiving this packet of information upon your request, which packet consists of the following:

- HSPH Equal Opportunity Policy
- HSPH Program Accessibility Policy for People with Disabilities
- HSPH Civil Rights Complaint Resolution Procedure
- HSPH Civil Rights Complaint Form

If you wish to file a civil rights complaint, contact HSPH's Civil Rights Contact:

Brian Morrissey
300 South Sixth Street MC 971
Minneapolis, MN 55487-0233
612-348-4766 (voice) or 7-1-1 (MN Relay Service)
Brian.Morrissey@hennepin.us (Email)

Attachment C

Civil Rights Complaint Form: Policy Violation in Service Delivery

Client / Complainant Information

NAME		TELEPHONE NUMBER	
STREET ADDRESS	CITY	STATE	ZIP CODE

Information about agency and/or parties

AGENCY NAME and/or PERSON'S NAME		AGENCY TELEPHONE NUMBER	
STREET ADDRESS	CITY	STATE	ZIP CODE

Information about alleged discrimination (check as many as apply)

<input type="checkbox"/> Race	<input type="checkbox"/> National origin	<input type="checkbox"/> Color	<input type="checkbox"/> Sex	<input type="checkbox"/> Religion	<input type="checkbox"/> Political beliefs
<input type="checkbox"/> Disability	<input type="checkbox"/> Sexual orientation	<input type="checkbox"/> Age	<input type="checkbox"/> Public assistance status	<input type="checkbox"/> Creed	

Details of alleged discrimination

<p>Explain what happened to you, including the following points:</p> <ul style="list-style-type: none">• Explain how you were treated differently from other people.• Explain why you believe you were treated differently• Give the date(s) of the incident(s).• If there were any witnesses, give their name(s) and explain what information they can provide. <p>If you need more space, write on the back of this page and/or attach additional pages.</p>	
SIGNATURE	DATE

Attachment D

Complaint Notification Form for Complaints Alleging Discrimination in Service Delivery

AUTHORITY: U.S. Department of Agriculture, Food and Nutrition Service Instruction 113-1.

REQUIREMENT: County human service agencies must notify the DHS Civil Rights Coordinator within 90 days of all service delivery discrimination complaints (i.e., civil rights complaints) filed against them.

ACTION REQUIRED: Use this form to notify DHS about service delivery discrimination complaints filed against HSPH and resolved at the county level. Complete this form and send it to the DHS Civil Rights Coordinator within 90 days of the date the complaint was filed.

1. Name, address, telephone number of complainant:

2. Name and address of county agency delivering the benefits, including names of any employees accused of wrongdoing:

3. Type of discrimination alleged:

4. Describe the alleged discrimination, including the dates it happened. Give names and contact information of any witnesses:

5. Give a summary of the investigation findings, including any corrective action ordered:

CONTACT INFORMATION:

Civil Rights Coordinator
Minnesota Department of Human Services
Equal Opportunity and Access Division
P.O. Box 64997
St. Paul, MN 55164-0997
651-431-3040 (voice) or use your preferred relay service
651-431-7444 (fax)
dhs.equalopportunity@state.mn.us

Attachment E

Americans with Disabilities Act (ADA)

Hennepin County obeys the Americans with Disabilities Act (ADA). The ADA forbids discrimination against people based on their disability.

County programs and services are for everyone, including anyone with a speech, sight, hearing, or other disability. The county is required to help people with disabilities take part in its programs and services.

If you need help because of a disability, tell a county staff person. If that person cannot help you, ask to talk to the staff person's supervisor.

More information on ADA

If you want to:

- See the ADA law or regulations
- Ask questions about your rights under the ADA
- Ask for a change in county policies or practices because of your disability
- Get more help with something that concerns your disability

Filing a grievance

The county has developed a procedure to resolve citizens' complaints, concerns, and other grievances for ADA-related issues. Proceed to the [Grievance Form](#).

Web accessibility

People regardless of disability should be able to easily interact with the county online.

We follow the Web Content Accessibility Guidelines 2.1 (WCAG). We must meet success criteria for level A and AA, and level AAA where possible and relevant.

We adhere to state and federal law including [Section 508 of the Rehabilitation Act of 1973](#).

We validate for accessibility using in-person testing and tools like [WAVE](#).

We correct web accessibility issues where we find them.

Contact us for questions or issues about web accessibility.

County ADA Coordinator

- **Contact Tracey Lor**, 612-543-4015 (voice) or 612-349-5467 (TTY)

Attachment F

Limited English Proficiency Plan

The Hennepin County Limited English Proficiency Plan (updated 2025) is a stand-alone document which is incorporated into this Comprehensive Civil Rights Plan.



2024-2026 STATE-COUNTY CIVIL RIGHTS ASSURANCE AGREEMENT

The County Agency Hennepin County agrees to act in accordance with the provisions of the Food and Nutrition Act of 2008, as amended, implementing regulations and any applicable provisions of the FNS approved State Plan of Operation with the State of Minnesota. The County Agency and the State agency further agree to fully comply with any changes in Federal law and regulations. This agreement may be modified with the mutual consent of the County Agency, the State agency, and FNS USDA.

The County Agency agrees to comply with the State-County Civil Rights Assurance Agreement as a condition of receiving Federal financial assistance provided to the State of Minnesota by the USDA under the authority of the Food and Nutrition Act of 2008, as amended.

The State-County Civil Rights Assurance Agreement is binding upon the County Agency, its successors, transferees, and assignees for as long as the County Agency receives Federal financial assistance from the State of Minnesota by the USDA under the authority of the Food and Nutrition Act of 2008, as amended.

The State of Minnesota may enforce all parts of the Civil Rights Assurance Agreement as a condition of the County Agency's receipt of Federal funds from the State of Minnesota by the USDA under the authority of the Food and Nutrition Act of 2008, as amended.

Compliance by Contractors and Vendors: The County Agency further agrees that by accepting this Civil Rights Assurance Agreement, it will obtain a written statement of assurance from all of its contractors and vendors (*i.e.*, applying to all programs), assuring that they will also operate in compliance with the stated nondiscrimination laws, regulations, policies, and guidance. The written statement of assurance from all of its contractors and vendors must be maintained as part of the County Agency's Comprehensive Civil Rights Plan and must be made available for review upon request by the State of Minnesota or the U.S. Department of Agriculture.

RECIPIENT AGREES TO COMPLY WITH ALL APPLICABLE FEDERAL AND STATE CIVIL RIGHTS LAWS:

The County Agency agrees to:

1. Administer all programs in accordance with the provisions contained in the Food and Nutrition Act of 2008, as amended, and in the manner prescribed by regulations issued pursuant to the Act; and to follow the FNS-approved State Plan of Operation.
2. Assurance of Civil Rights Compliance: Comply with Title VI of the Civil Rights Act of 1964 ([42 U.S.C. 2000d et seq.](#)), Title IX of the Education Amendments of

1972 ([20 U.S.C. 1681 et seq.](#)), Section 504 of the Rehabilitation Act of 1973 ([29 U.S.C. 794](#)), the Age Discrimination Act of 1975 ([42 U.S.C 6101 et seq.](#)), section 11(c) of the Food and Nutrition Act of 2008, as of amended (7 U.S.C 2020), Title II and Title III of the Americans with Disabilities Act (ADA) of 1990 as amended by the ADA Amendments Act of 2008 ([42 U.S.C. 12131-12189](#)) as implemented by Department of Justice regulations at [28 CFR part 35](#) and [36](#), Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (August 11, 2000), and all requirements imposed by the regulations issued by the Department of Agriculture to the effect that, no person in the United States shall, on the grounds of sex, including gender identity and sexual orientation, race, color, age, political belief, religious creed, disability, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subject to discrimination under SNAP. This includes program-specific requirements found at [7 CFR part 15 et. seq.](#) and [7 CFR 272.6](#).

This assurance is given in consideration of and for the purpose of obtaining any and all Federal assistance extended to the State by the USDA under the authority of the Food and Nutrition Act of 2008, as amended. Federal financial assistance includes grants, and loans of Federal funds; reimbursable expenditures grants or donations of Federal property and interest in property; the detail of Federal personnel; the sale, lease of, or permissions to use Federal property or interest in such property; the furnishing of services without consideration, or at a nominal consideration, or at a consideration that is reduced for the purpose of assisting the recipient or in recognition of the public interest to be served by such sale, lease, or furnishing of services to the recipient; or any improvements made with Federal financial assistance extended to the State by USDA. This assistance also includes any Federal agreement, arrangement, or other contract that has as one of its purposes the provision of cash assistance for the purchase of food, cash assistance for purchase or rental of food service equipment or any other financial assistance extended in reliance on the representations and agreements made in this assurance.

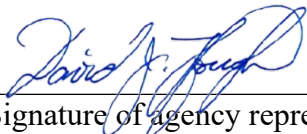
By accepting this assurance, the County agency agrees to compile data, maintain records, and submit records and reports as required, to permit effective enforcement of nondiscrimination laws and permit authorized USDA personnel during hours of program operation to review and copy such records, books, and accounts, access such facilities and interview such personnel as needed to ascertain compliance with the nondiscrimination laws. If there are any violations of this assurance, the State agency, shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the County agency, its successors, transferees and assignees as it receives assistance or retains possession of any assistance from USDA. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the County agency.

3. (For States with Indian Reservations only). Implement the program in a manner that is responsive to the special need of American Indians on reservations and

consult in good faith with tribal organizations about that portion of the State's Plan of Operation pertaining to the implementation of the Program for the members of the tribe on reservations.

4. FNS agrees to:
 1. Pay administrative cost in accordance with the Food and Nutrition Act of 2008, implementing regulations, and an approved Cost Allocation Plan.
 2. Carry out any other responsibilities delegated by the Secretary in the Food and Nutrition Act of 2008, as amended.

By signing on behalf of the County Agency, I state that I am authorized to bind the County Agency to the terms of the 2024-2026 Civil Rights Assurance Agreement and commit it to the above provisions.



Signature of agency representative

David Hough

Print Name

Hennepin County

Name of County Agency

300 S. 6th St., Minneapolis, MN 55487

Street Address, City, State, Zip Code

Unless amended or rescinded, this 2024-2026 Civil Rights Assurance Agreement is valid through December 31, 2026.

ADDENDUM

Clarification of SNAP Civil Rights Requirements - Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency (LEP)," and Titles II and III of the Americans with Disabilities Act.

This addendum clarifies core civil rights requirements to ensure meaningful access to programs, services, and information for persons with Limited English Proficiency (LEP) and persons with disabilities in accordance with Federal law, regulations, and current guidance from the U.S. Department of Department of Justice (DOJ) and the U.S. Department of Agriculture (USDA).

Meaningful Access for LEP Individuals

County agencies that participate in the Supplemental Nutrition Assistance Program (SNAP) must take reasonable steps to ensure that LEP persons have meaningful access to programs, services, and benefits. This includes the requirement to provide bilingual program information and certification materials and interpretation services to single-language minorities in certain project areas. SNAP County agencies that do not provide meaningful access for LEP individuals risk violating prohibitions against discrimination based on National Origin in the Food and Nutrition Act of 2008, as amended, Title VI of the Civil Rights Act of 1964 (Title VI), and SNAP program regulations.

Federal LEP regulations and guidance include:

- SNAP regulations provided by 7 CFR Part 272.4 (b), "Bilingual requirements";
- Executive Order 13166 of August 11, 2000, "Improving Access to Services for Persons with Limited English Proficiency," reprinted in 65 FR 50121, 50122 (August 16, 2000);
- DOJ policy guidance titled, "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons," published in 67 FR 41455, 41457 (June 18, 2002); and
- USDA policy guidance titled, "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons," published in 79 FR 70771-70784 (November 28, 2014).

Four Factor Analysis for Assessing LEP Needs

To be in compliance, the Title VI guidance provided by DOJ and USDA instructs County Agencies to assess the LEP needs of the population served and determine the LEP services required by balancing four factors:

1. The number or proportion of persons with limited English proficiency are eligible to be served or likely to be encountered within the area serviced by the recipient;

2. The frequency with which persons with limited English proficiency come in contact with the program;
3. The nature and importance of the program, activity, or service to people's lives; and
4. The resources available to the recipient and costs.

SNAP County agencies must also comply with the specific requirements established by 7 CFR Part 272.4 (b) and should include these obligations in the LEP assessment.

Developing an LEP Plan

After completing an assessment of LEP needs, SNAP County agencies should develop an implementing plan to address the LEP needs of the population served. This may include contracting for oral interpretation services, hiring bilingual staff, arranging for telephone interpreters and/or language lines, coordinating community volunteers, translating vital documents, and providing written notice that language line services are available in appropriate languages. Quality and accuracy of the language service is critical in order to avoid serious consequences to the LEP person and to the recipient. LEP needs should be considered in developing County and local budgets and front-line staff should understand how to obtain LEP services.

USDA's 2014 policy guidance includes detailed information on assessing LEP needs, identifying practices for translating documents that will be seen as strong evidence of compliance. For additional assistance and information regarding LEP matters, please also visit <http://www.lep.gov>. The website includes online LEP mapping tools designed to help assess the language needs of the population served by a particular program or facility.

Ensuring Equal Opportunity Access for Persons with Disabilities

SNAP County agencies must also ensure equal opportunity access for persons with disabilities. This includes ensuring that communications with applicants, participants, members of the public, and companions with disabilities are as effective as communications with people without disabilities. County agencies that do not provide persons with disabilities equal opportunity access to programs may risk violating prohibitions against disability discrimination in the Rehabilitation Act of 1978, the Americans with Disabilities Act (ADA), and SNAP program regulations. DOJ published revised final regulations implementing Titles II and III of the ADA on September 15, 2010. These regulations are codified at 28 CFR Part 35, "Nondiscrimination on the Basis of Disability in State and Local Government Services" and 28 CFR Part 36, "Nondiscrimination on the Basis of Disability in Public Accommodations and Commercial Facilities." In accordance with the implementing regulations, County Agencies must provide auxiliary aids and services where necessary to ensure effective communication and equal opportunity access to program benefits for individuals with disabilities. The type of auxiliary aids and services required will vary, but a County agency may not require an individual with a disability to bring another individual to interpret, and may rely on a person accompanying a

disabled individual only in limited circumstances. When a County agency communicates with applicants and beneficiaries by telephone, it must provide text telephone services (TTY) or an equally effective electronic telecommunications system to communicate with individuals who are deaf, hard of hearing, or hearing impaired. County agencies must also ensure that interested persons, including people with low vision or who are hard of hearing can obtain information as to the existence and location of accessible services, activities, and facilities. For more information, please visit the ADA website: www.ada.gov

Please submit the signed 2024-2026 STATE-COUNTY CIVIL RIGHTS ASSURANCE AGREEMENT to:

**Civil Rights Coordinator
Minnesota Department of Human Services
Equal Opportunity and Access Division (EOAD)
P.O. Box 64997
St. Paul, MN 55164-0997**

Email: dhs.equalopportunity@state.mn.us

EOAD Telephone: 651-431-3040 (voice) or use your preferred relay service