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USDA CIVIL RIGHTS TRAINING

Prepared by: The State of Georgia

Date: Federal Fiscal Year 2025

Civil Rights Training

- **ALL Members must complete the annual Civil Rights training**
- **Registered Shoppers and those managing food distributions must complete this training annually.**
- **You must maintain records of these trainings.**
 - Volunteer Log
 - Certificates of Completion (For both Food Safety and Civil Rights)
 - The Food Bank will request to see these documents during audits and monitoring visits

Purpose

The purpose of this Civil Rights instruction is to establish and convey policy and provide guidance to ensure compliance with and enforcement of the prohibition against discrimination in TEFAP and all nutrition programs and activities, whether federally funded in whole or not.

“In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies...[all] USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.”

Protected Classes

ALL food distributed to Neighbors must be provided and serviced to Neighbors without any discrimination of:

- Race
- Color
- National Origin
- Age
- Sex
- Disability
- Gender Identity
- Religion
- Reprisal
- Political Beliefs
- Martial Status
- Familial or Parental Status
- Sexual Orientation
- Public Assistance Income
- Protected Genetic Information in employment, program or activity conducted or funded by the Department

Civil Rights Legal Authorities

- Title VI of the Civil Rights Act of 1964
- Civil Rights Restoration Act of 1987
- Title IX of the Education Amendments of 1972
- Age Discrimination Act of 1975
- The Personal Responsibility and Work Opportunity Reconciliation Act of 1996
- Food and Nutrition Act of 2008, as amended
- Section 504 of the Rehabilitation Act of 1973; Americans w/Disabilities Act of 1990; and the Americans with Disabilities Act Amendments Act of 2008

Public Notification

Members who provide USDA foods must notify all Neighbors of:

- Distribution days and times (all USDA distributions must be public and advertised through the Food Bank's website).
- Neighbor rights and responsibilities, policies of non-discrimination, and policy for filing complaints (as addressed through using current year TEFAP eligibility forms and TEFAP signage).
- All TEFAP signage must be posted in a prominent location and readable. The signage may not be modified or altered.

Language Assistance

Food should be provided to all Neighbors, even if they may be limited in their English or if they are difficult to understand.

We must be prepared to provide reasonable accommodations for language assistance:

- Bilingual staff/volunteers/community organizations
- Translated TEFAP forms
- Google Translate
 - Live translation service
 - Scan-and-translate service for printed text

Language Assistance

DO NOT:

- **Ask Neighbors to bring their own interpreters.**
- **Ask to use Neighbor's children as interpreters.**
- **Deny food service if they do not speak English. Instead, assist them how you can with completing paperwork, if needed.**

Failure to provide language assistance accommodations can result in discrimination on the basis of national origin.

Accommodations and Communication Assistance for Persons with Disabilities

We are responsible to provide reasonable modifications and communication assistance to customers with disabilities to ensure equal opportunity to receive food.

For example:

- If the Neighbor has difficulty remembering information orally, provide the option of writing down any information.
- If the Neighbor is unable to carry their food to their vehicle, have a volunteer available to carry the food for them.
- If the Neighbor is unable to read the TEFAP form, assist them in completing the form.

Accommodations and Communication Assistance for Persons with Disabilities

When a Neighbor requests accommodation, identify what you can do to ensure they will have equal access to your food service.

- If a volunteer is uncertain if a request is reasonable, they should contact the manager of the food distribution. If the manager is also uncertain, they should contact their Food Access Coordinator.

Providing Quality Customer Service

Always represent the Food Bank's values of **Accountability, Belonging, Compassion, Dignity, Efficacy, and Stewardship** when serving our Neighbors.

To provide excellent customer service when serving Neighbors:

- Smile, Be Warm and Hospitable
- Treat Everyone with Respect and Courtesy
- Be Caring and Understanding
- Be a Good Listener
- Offer Assistance
- Serve Neighbors in A Timely Manner
- Apologize for Any Inconvenience
- Make Neighbors Feel Appreciated and Welcome

Conflict Resolution

What Steps do you need to take?

- Remain calm and courteous.
- Ask them what the problem is and determine the issue.
- Determine a reasonable solution that gains approval from the Neighbor.
 - You and the Neighbor should determine what is to be done, when it is to be done, and by whom and alternatives if needed.
- Follow up and personally make sure that the Neighbor's issue has been resolved.

Processing Complaints

Anyone who feels discriminated against has the right to file a complaint within 180 day of the alleged discriminatory act.

1. Make sure you understand the person's concern.
2. Record details of the incident leading to the complaint, documenting the date, time, parties involved, and the issue in detail.
3. Try to reconcile the issue.
4. If unable to reconcile, give the Neighbor blank TEFAP form (pointing to the non-discriminatory statement at the bottom), refer them to the "And Justice for All" poster to explain their right to file a complaint.
5. Notify your Food Access Coordinator immediately and provide all recorded details.

Compliance

A Member is considered out of compliance they are found not adhering to regulation, policy, instruction, or guidelines administered by the Food Bank. This includes addressing Civil Rights and the Neighbor Experience.

If a Member is found out of compliance regarding Civil Rights, they will be notified in writing listing the areas of noncompliance and any required corrective action. In severe cases, the Member may have their Membership immediately revoked and their account deactivated.