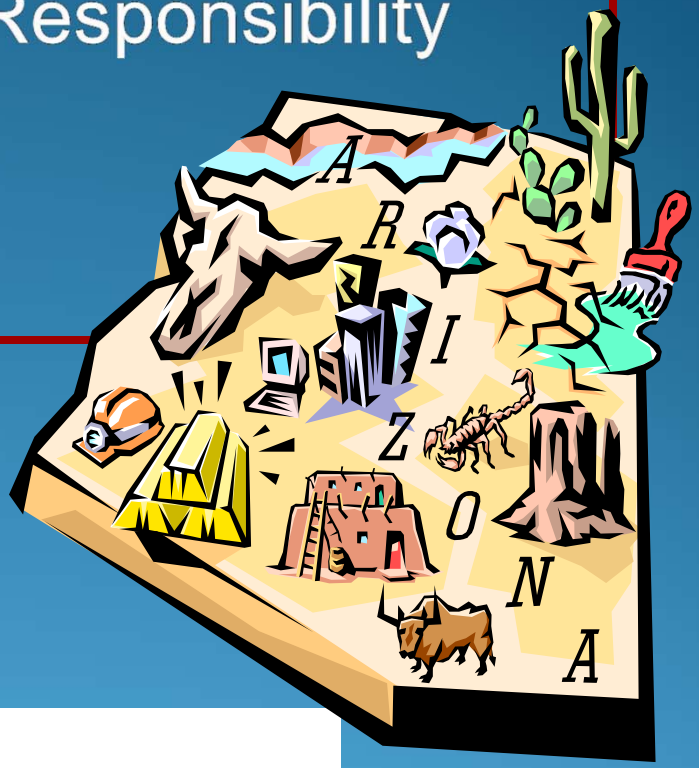
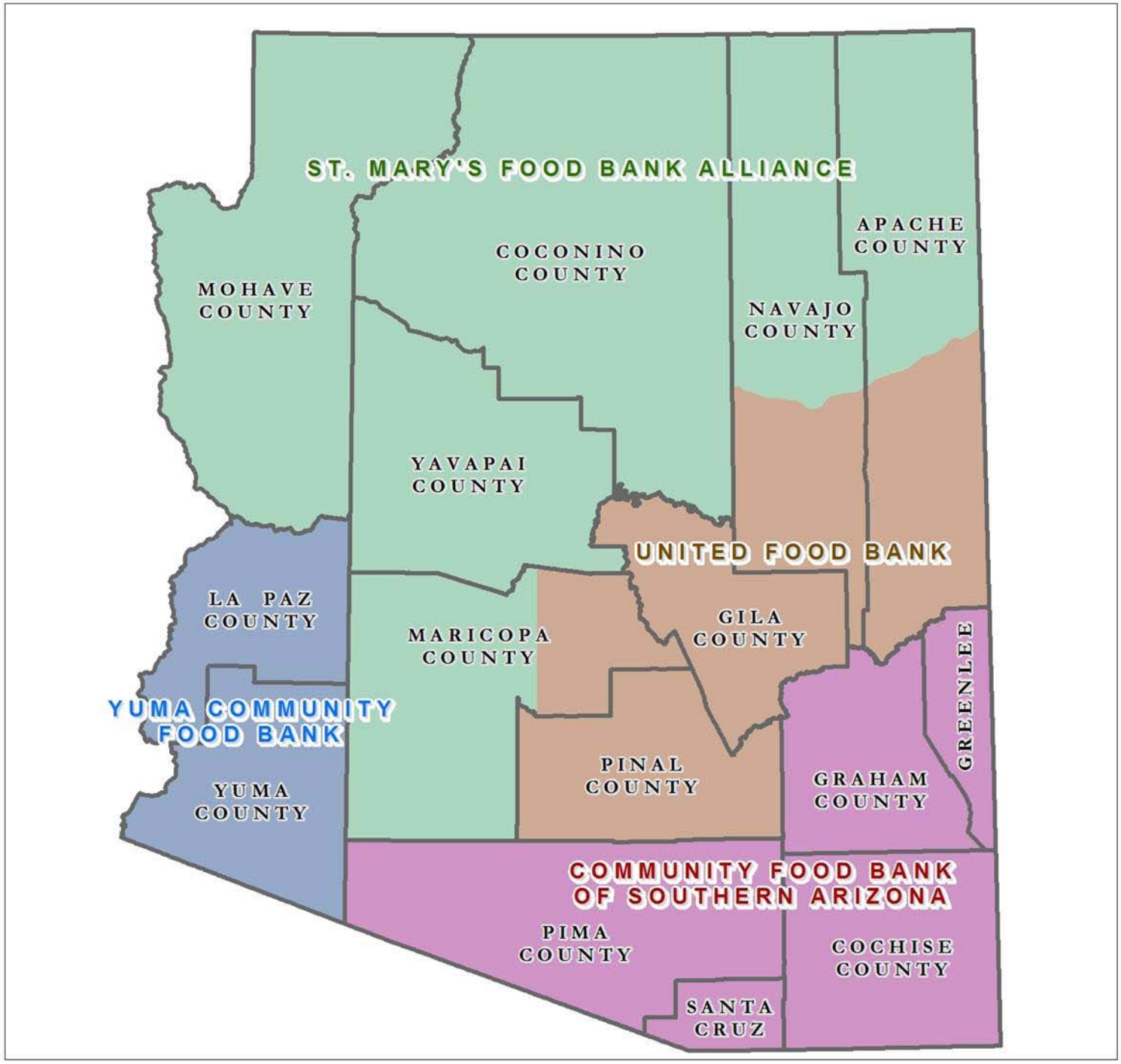
TEFAP
The Emergency Food Assistance Program Civil Rights and Program Responsibility Training
2015-2016



DEPARTMENT OF ECONOMIC SECURITY

Your Partner For A Stronger Arizona



DEPARTMENT OF ECONOMIC SECURITY
Your Partner For A Stronger Arizona

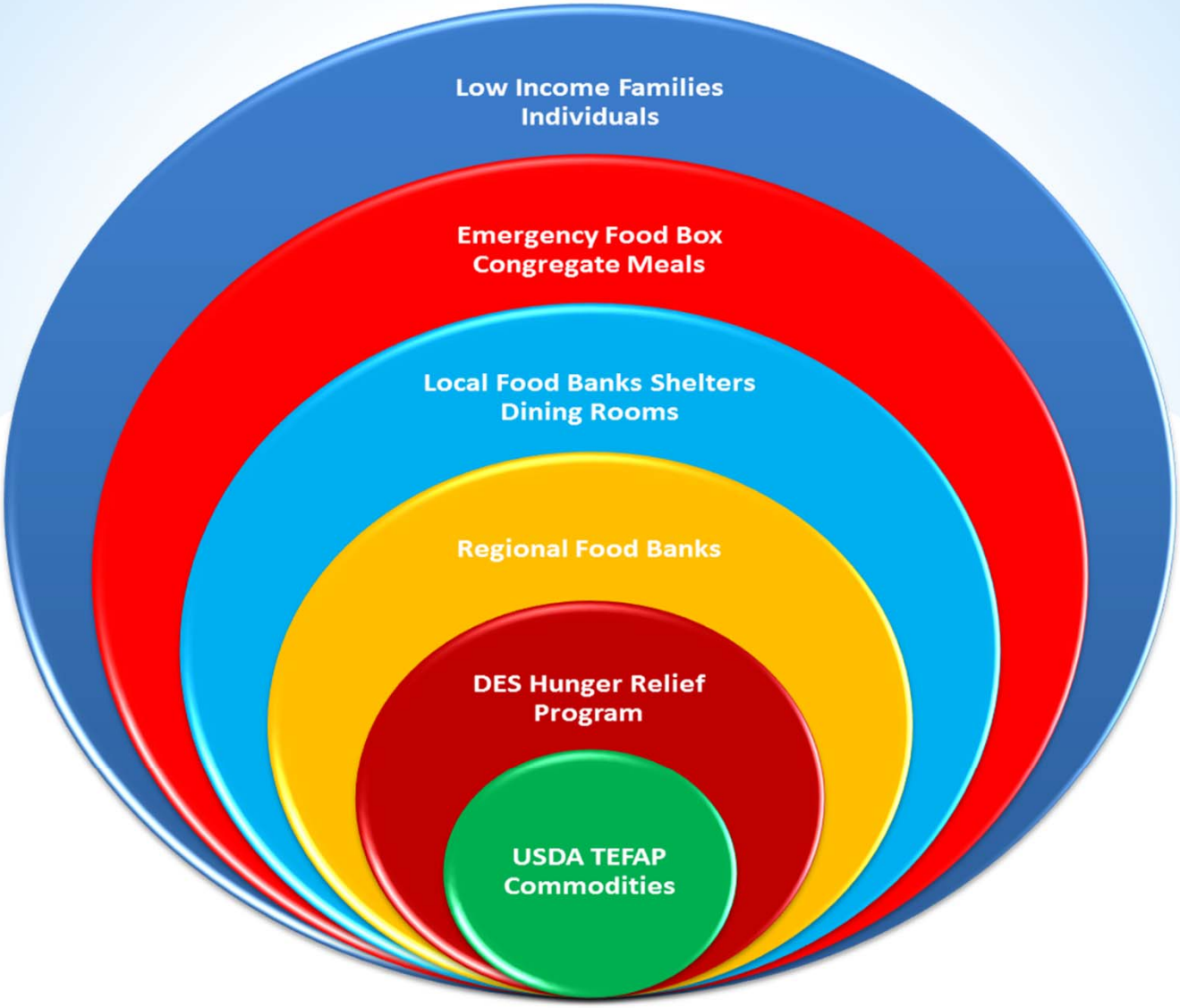
Arizona Hunger Relief Program

Regions

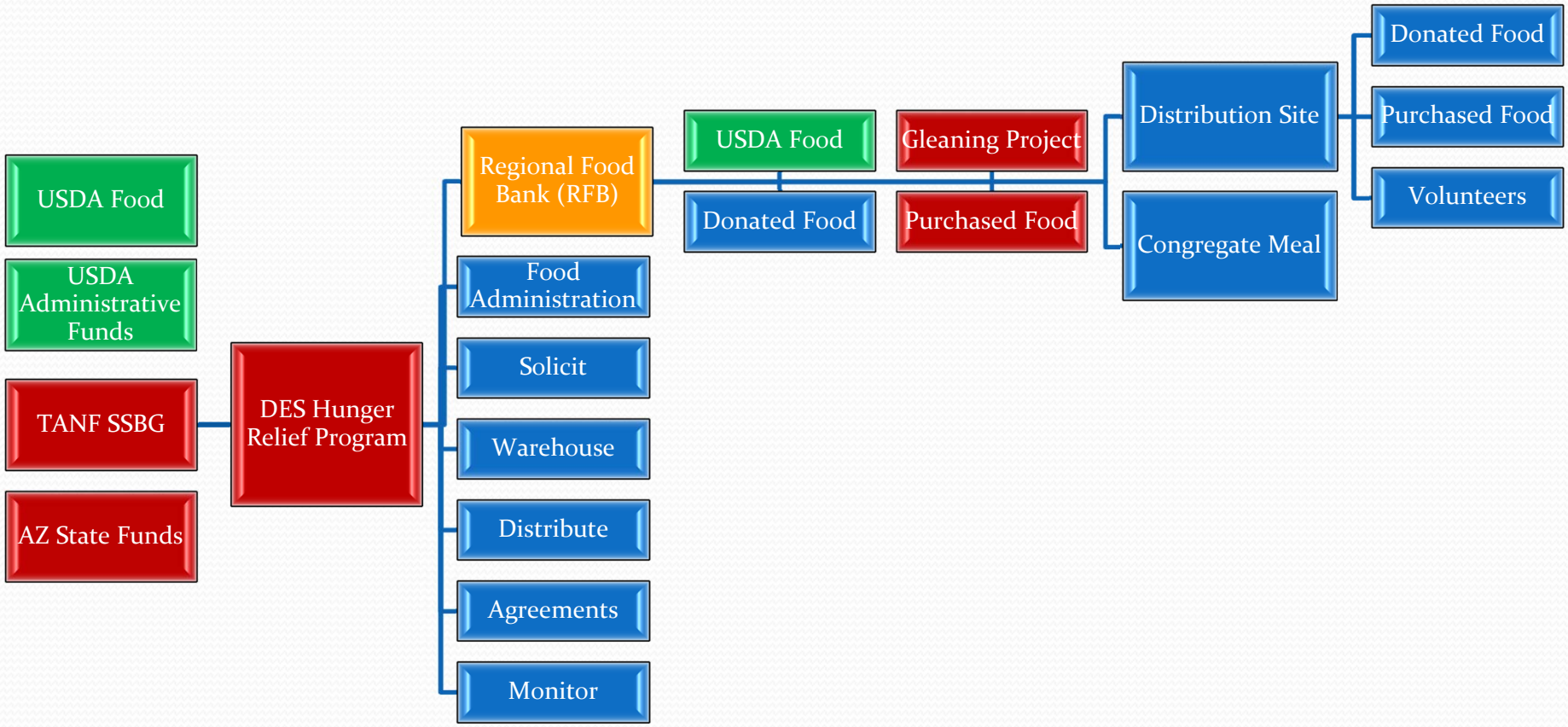
Food Bank Regions

- St. Mary's Food Bank Alliance
- Community Food Bank of Southern Arizona
- United Food Bank
- Yuma Community Food Bank

County Boundary



AZ Emergency Food Assistance Program



❖HUNGER RELIEF PROGRAM

ENTITLEMENT

Fair Share Based on State Poverty and Unemployment

$5,970,521

Pounds 10,055,286

BONUS/SURPLUS

Fair Share Based on State Poverty and Unemployment

$5,126,936

Pounds 6,150,286

Total Food Funds and Pounds Available

$11,907,458

Pounds 16,206,266

Goal Of Civil Rights

- To ensure: Equal, fair and respectful treatment for all applicants and beneficiaries.
- Knowledge of rights and responsibilities
- Elimination of illegal barriers that prevent or deter people from receiving benefits
- Dignity and respect for all

Resources

- Title VI – Civil Rights Act of 1964- *Race, color, national origin*
- Title IX of the Education Amendments of 1972-*Sex*
- Section 504 of the Rehabilitation Act of 1973 *Disability*
- Americans with Disabilities Act *Disability*
- Age Discrimination Act of 1975– *Age*
- Civil Rights Restoration Act of 1987– *Race, color & national origin*
- Program statutes and regulations - *race, color, national origin, sex, age, and disability*

Program Responsibilities

- Compliance with civil rights laws, regulations and requirements
- Training staff and volunteers in civil rights, eligibility and distribution requirements
- Providing other language services for non-English speaking clients
- Equal treatment for religious organizations

Program Responsibilities

- Public notification System
- Civil Rights Complaints
- Civil Rights Assurances
- Disability Accommodations
- Resolving conflicts
- Customer Service

Civil Rights Laws

Civil Rights laws and regulations are in place to ensure that people are not discriminated against by programs that receive federal assistance.

- This includes cash grants, commodities, training, equipment and other goods and services.
- TEFAP is a federal assistance program so recipient agencies must follow these laws.

Protected Classes

- This is a person or group of people who have characteristics for which discrimination is prohibited based on a law, regulation or executive order.

- The protected classes for TEFAP is race, color, national origin, age, disability, and sex.

EQUAL OPPORTUNITY FOR RELIGIOUS ORGANIZATIONS

- Religious organizations can receive federal funds to operate emergency feeding programs.
- However these organizations can not discriminate against a beneficiary or prospective beneficiary on the basis of religion or religious belief.
- Faith Based Organizations can use space in their facilities without removing religious art or symbols.
- No USDA funds can be used for religious activities, information on those activities can not be distributed to clients and they can not be made to feel that participation in a religious activity is necessary to receive assistance.

FNS Instruction 113-1
IX PUBLIC NOTIFICATION

All USDA Food and Nutrition Services assistance programs must include a public notification system.

- The purpose of this system is to inform applicants, participants, and potentially eligible persons of program availability, program rights and responsibilities, the policy of nondiscrimination, and the procedure for filing a complaint.

Basic Elements of Public Notification

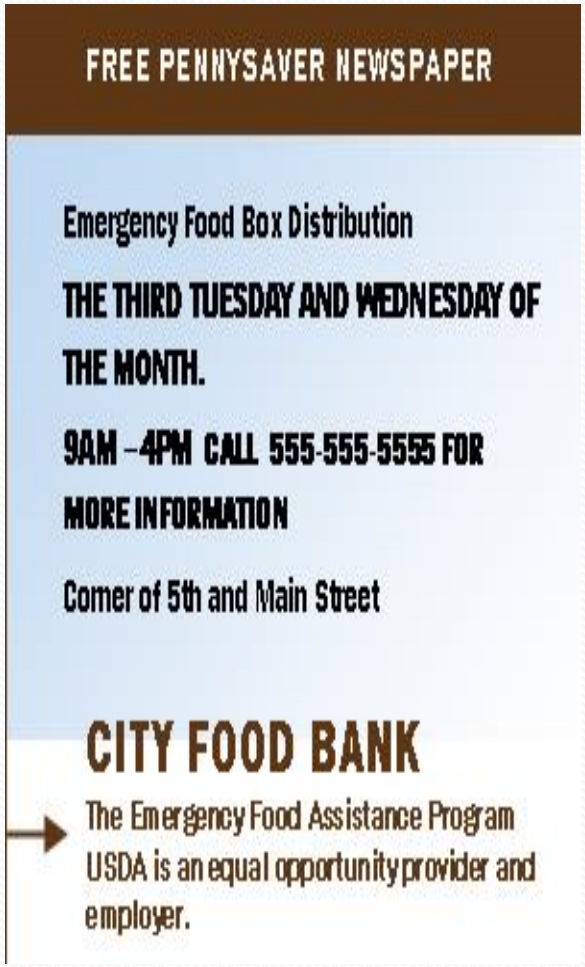
- The public notification system must include the following three basic elements:

  - Program Availability
  - Civil Rights Compliance
  - Complaint Information
  - Nondiscrimination Statement

Program Availability

- Each State agency, local agency, or other sub recipient that distributes program benefits and services must take specific action to inform applicants, participants, and potentially eligible persons of their program rights and responsibilities and the steps necessary for participation.

Public Notice



Civil Rights Compliance Review

- This is a desk or on-site civil rights review conducted after an organization has been authorized to receive Federal financial assistance.
- DES/HRP shall conduct routine civil rights reviews during regular on-site reviews.
- Targeted civil rights reviews will be conducted by DES/HRP when there are indications of possible civil rights violations.

Compliance Review Questions

- Is the appropriate nondiscrimination statement included on all materials that describe TEFAP and SNAP?
- Has the agency established a public notification system to inform minorities and grassroots organizations of TEFAP, their admissions policy and civil rights complaint procedures?
- Is the facility accessible to the disabled?
- Is assistance available for persons that have Limited English Proficiency?
- Has the organization received any civil rights complaints? If yes, were they handled properly? Are the organization's procedures adequate?

Compliance Review Questions

- Do potentially eligible persons have an equal opportunity to participate?
- Do policies and practices ensure equal treatment for services and benefits regardless of their protected class?
- Is USDA's "And Justice For All" (11" x 17") poster prominently displayed where it can be seen by applicants, participants and visitors?
- Have regular civil rights training, commodity distribution policies and complaint procedures been provided to persons dispensing USDA foods? To other staff and volunteers?
- Does the facility publicize that it provides services to all persons without regard to race, color, national origin, age, sex or disability?

Civil Rights Complaint

- A **Civil Rights complaint** is a verbal or written allegation of discrimination that an USDA/FNS/TEFAP program is administered or operated in a manner that results in disparate treatment or services being provided to persons or groups of persons because of their protected class.

Complaint/Grievance Form

- The USDA has found that many "civil rights" complaints are actually customer service issues (claims of rudeness, impatience, lack of understanding or compassion) and, as much as possible, want these matters resolved on a local level. Ultimately our goal is to ensure that civil rights are honored and the complainant is satisfied that their complaint has been taken seriously, addressed, and resolved.
- If a client reports unfair treatment that they perceive to be based on any of the "protected classes" or if they simply feel that they have been discriminated against and want to make a complaint, you must assist them.

HRP-1014A FORFF (4-15)

ARIZONA DEPARTMENT OF ECONOMIC SECURITY
Division of Benefits and Medical Eligibility (DBME)
Coordinated Hunger Relief Program

The Emergency Food Assistance Program (TEFAP)
CIVIL RIGHTS COMPLAINT / GRIEVANCE

Complainant's Information

NAME		DATE
ADDRESS *(No., Street, City, State, ZIP)*		
HOME PHONE NO.	CELL NO.	EMAIL ADDRESS

CHECK TYPE OF DISCRIMINATION

☐ Race ☐ Color ☐ National Origin ☐ Sex ☐ Age ☐ Disability

STATUS OF PERSON FILING COMPLAINT / GRIEVANCE

☐ Individual ☐ Organization ☐ Employee ☐ Other:

Statement of complaint / grievance *(Include type of discrimination charged and the specific incident and date(s) in which it occurred)*

COMPLAINANT'S SIGNATURE

Routing (send one copy to):

- Agency/Civil Rights Coordinator
- Department of Economic Security / Coordinated Hunger Relief Program
  1789 West Jefferson Street
  Site Code 960A
  Phoenix, AZ 85007
  Lhamman@azdes.gov
- Keep original for your records

You may also send a discrimination complaint directly to:

- U.S. Department of Agriculture
  Director, Office of Adjudication
  1400 Independence Avenue, SW
  Washington, D.C. 20250-9410

Or call: (202) 720-2600 (voice and TDD)

You may also call:

DES/Hunger Relief Program (602) 542-0322, (602) 542-5071 or the DES/ADA Liaison (602) 771-7500

Agency Civil Rights Office Use Only

DATE COMPLAINT RECEIVED	COMPLAINT NO.	AGENCY LOCATION OF INCIDENT
NAME OF PERSON RECEIVING COMPLAINT		SIGNATURE

See page 3 for USDA/EOE/ADA/LEP/GINA disclosures

Complaint Grievance Form

Complaint Grievance Form

INSTRUCTIONS: Log Complaint in Agency Civil Rights Complaint Log

The client may directly register a complaint of discrimination:

If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov. USDA is an equal opportunity provider and employer."

1 Copy To: Complainant (Originator of Complaint/Grievance)

1 Copy To: Agency/Civil Rights Coordinator

1 Copy To: Department of Economic Security Hunger Relief Program
+CoordinatedHungerReliefProgram@azdes.gov
1789 West Jefferson Site code 960A Phoenix, AZ 85007

Complaint Instructions

- Keep copies of the Complaint Grievance Form on file for those who wish to file a written complaint, and inform all staff and volunteers serving clients on how to use it to record a complaint. If a client declines to complete the form in writing you must complete it for them from their verbal complaint.
- Notify your RFB about the complaint and forward a copy of the complaint form. Your RFB representative will forward the complaint to DES/HRP. Your RFB representative will follow-up with DES/HRP for advice and guidance in identifying corrective action to be taken, if necessary, to satisfy the complainant and to prevent further complaints against the agency.

Complaint Instructions

- DES/HRP will also notify RFB of their determination of whether the complaint involves a "protected class" and suggest the plan for resolution. If the complaint involves a protected class, it is forwarded to the USDA Food and Nutrition Service (FNS) for processing. (Once the complaint is with the FNS a decision letter must be issued within 90 days.)

- Often the complaint describes poor customer service or a misunderstanding due to language or other reason. Using their good judgment, RFB, and local agency staff should accomplish resolution of the conflict within thirty days.

- A letter describing the final outcome of the complaint and copies of correspondence related to resolution of the complaint will be forwarded by the RFB to DES/HRP and local agency within 60 days

Verbal Complaints

- If a verbal complaint is received and the client is not willing to place allegations in writing, the person receiving the complaint may write up the elements of the complaint for the complainant using the Complaint Grievance Form.
- The client may directly register a complaint of discrimination:

  If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

Verbal Complaints

- Nature of the incident or action that led the complainant to feel discriminated against
- Basis on which the complainant feels discrimination occurred race, color, national origin, age, sex, political disability. Every effort needs to be made to obtain: – Name, address, telephone number, or other means of contacting the complainant
- Specific location and organization delivering service/benefit

Verbal Complaints

- Names, titles, and business address of persons who may have knowledge of the discriminatory action

- Date(s) during which the alleged discriminatory actions occurred, or if continuing, the duration of such actions.

- Anonymous complaints are to be handled just as any other complaint though, of course, full resolution will not be possible.

Complaint Documentation

- It is critical that you fully document each step from the initial complaint to the resolution.
-
- Use the Complaint Grievance Form, whenever possible, and take good notes!
- Document in writing each conversation and action taken.
- Keep a copy of all documentation and post in Complaint Grievance Log.

Complaints

Remember that complaints may be filed for discrimination based on:

- Race, color, national origin, age, sex, or disability.
- Never discourage groups or individuals from filing complaints or from voicing allegations of discrimination.

Non-Discrimination Statement

The U.S. Department of Agriculture prohibits discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or all or part of an individual's income is derived from any public assistant program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)

If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

Individuals who are deaf, hard of hearing, or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish).
USDA is an equal opportunity provider and employer.

Nondiscrimination Statement

- **All** information materials and sources, including Web sites, used by FNS, State agencies, local agencies, or other sub recipients to inform the public about FNS programs must contain a nondiscrimination statement.

Nondiscrimination Statement

- It is not required that the nondiscrimination statement be included on every page of the program information or Web site.
- At the minimum, the nondiscrimination statement, or a link to it, must be included on the home page of the program information.

Non-Discrimination Statement Short Version

"USDA is an equal opportunity provider and employer."

- May be used where the longer statement does not fit.
- Must be in font size no smaller than font size used in rest of publication
- Should not be used where information on rights is provided.

Nondiscrimination Statements Are Not Required

Imprinted on items such as cups, buttons, pens, and so forth.

- This is the **"And Justice for All"** poster available through the USDA. It details a person's civil rights and how a person can file a civil rights complaint. It must be posted in a visible area of any agency that receives TEFAP funds or commodities.

Income Guidelines

Department of Economic Security/Hunger Relief Program
Income Eligibility Guidelines
Effective from July 1, 2015 to June 30, 2016
185 % of Federal Poverty Level

Household Del Hogar	Annual Anual	Monthly Mensual	Twice Monthly Dos veces al mes	Bi-Weekly Dos veces a la semana	Weekly Semanal
1	$21,775	$1,815	$908	$838	$419
2	$29,471	$2,456	$1,228	$1,134	$567
3	$37,167	$3,098	$1,549	$1,430	$715
4	$44,863	$3,739	$1,870	$1,726	$863
5	$52,559	$4,380	$2,190	$2,022	$1,011
6	$60,255	$5,022	$2,511	$2,318	$1,159
7	$67,951	$5,663	$2,832	$2,614	$1,307
8	$75,647	$6,304	$3,152	$2,910	$1,455
For Each add'l member, add	+$7,696	+$642	+$321	+$296	+$148

Federal Register / Vol. 80 No. 61/Tuesday March 31, 2015/Notices
The U.S. Department of Agriculture (USDA) prohibits discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal and, where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)
If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email atprogram.intake@usda.gov.
Individuals who are deaf, hard of hearing, or have speech disabilities and wish to file either an EEO or program complaint please contact USDA through the Federal Relay Service at (800) 877-8339 or (800) 845-6136 (in Spanish).
Persons with disabilities who wish to file a program complaint, please see information above on how to contact us by mail directly or by email. If you require alternative means of communication for program information (e.g., Braille, large print, audiotape, etc.) please contact USDA's TARGET Center at (202) 720-2600 (voice and TDD). USDA is an equal opportunity provider and employer.

AMERICANS WITH DISABILITIES ACT/504 REHABILITATION ACT ADA/504 NOTICE

It is the policy of _____ not to discriminate on the basis of disability in admission to, access to, or operation of its programs, services, and activities or in its hiring and employment practices.

Individuals with disabilities who need accommodation, including auxiliary aids for effective communication in programs, services, or activities, are invited to make their needs and preferences known to the office staff.

Questions, concerns, complaints, or requests for additional information may be forwarded to :

Name:	Agency:
Days/Hours Available:	Address
Telephone No:	TDD No:

LIMITED ENGLISH PROFICIENCY (LEP)

- Every program must have a plan to serve clients who speak limited English.

LEP Definition

- ✓ Limited English Proficiency (LEP) Persons. Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

- ✓ Recipients of Federal financial assistance have a responsibility to take reasonable steps to ensure meaningful access to their programs and activities by person(s) with limited English proficiency.

LEP

- ✓ State agencies, local agencies, or other sub-recipients that fail to provide services to Limited English Proficiency (LEP) potentially eligible persons, applicants, and participants, or deny them access to federally assisted programs and activities, may be discriminating on the basis of national origin in violation of Title VI and its implementing regulations.

LEP

- Title VI and its regulations require State agencies, local agencies, or other sub-recipients to take reasonable steps to assure "meaningful" access to the information and services they provide.

LEP

What constitutes reasonable steps to assure meaningful access will be contingent on a number of factors:

- The number and proportion of people your program serves that speak that language.

- The greater the number or proportion of these LEP persons, the more likely language services are needed.

LEP

2. The frequency of LEP persons' contact with program:
   - Recipient organization should assess, as accurately as possible, the frequency with which they have or should have contact with an LEP individual from different language groups seeking assistance
   - If an LEP individual accesses a program or service on a daily basis, a recipient has greater duties than if the same individual's program or activity contact is unpredictable or infrequent.

LEP Resources

- ✓ A recipient's level of resources and the costs that would be imposed on it may have an impact on the nature of the steps it should take. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits.

- ✓ Resource and cost issues, however, can often be reduced by technological advances; the sharing of language assistance materials and services among and between recipients, advocacy groups, and Federal grant agencies; and reasonable business practices.

Elements of an Effective LEP Policy

- Identifying LEP persons who need language assistance
- Identifying ways in which language assistance will be provided
- Training staff
- Providing notice to LEP persons
- Oral interpretation services
- Bilingual staff
- Telephone interpreter lines
- Written language services
- Community volunteers
- Monitoring and updating LEP policy

LEP Services

How service is provided depends on:

- The number and proportion of people your program serves that speak that language
- The frequency of LEP persons' contact with program
- The resources you have available and costs it would incur.

Shortage of resources does <u>not</u> eliminate this requirement.

Customer Service

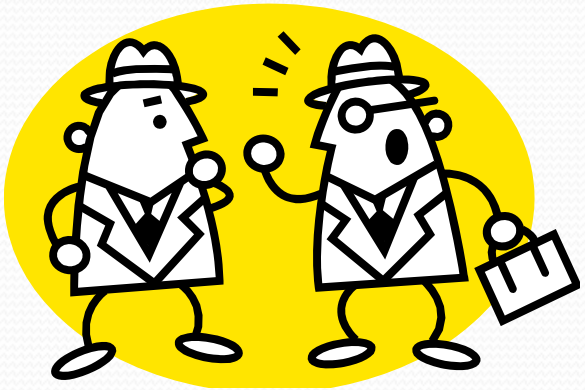
- ✓ Be patient and polite.
- ✓ Avoid sarcasm.
- ✓ Be empathetic.
- ✓ Understand that people may not know the rules or understand how programs work.
- ✓ They may feel uncomfortable coming to ask for help.

- ✓ Smile when appropriate – make people feel welcome and valued.
- ✓ Explain policy and let them know you have to follow the same rules for everyone.
- ✓ Don’t be afraid to apologize.
- ✓ Don’t feel that you need to have the last word.

Conflict Resolution

- It is best for your agency to have a written and posted policy for dealing with unacceptable behavior and conflicts.

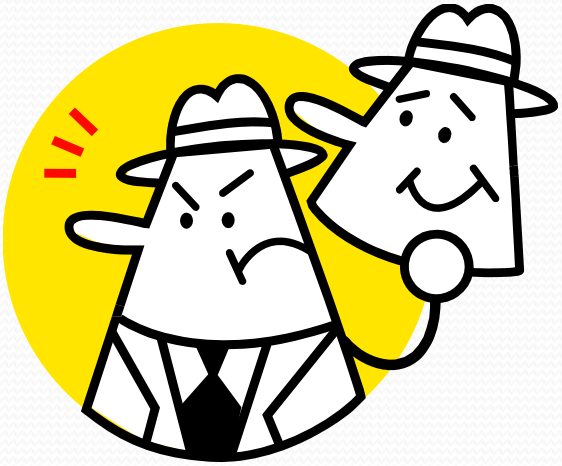
- Try to remain calm when addressing the other person.



Conflict Resolution

- Try to explain your understanding of the situation.

- Get help from someone else, especially if threats or violence is possible.



Demographics Household Distribution

Sign in Sheet necessary information:

- **Name**
- **Address**
- **Number of People in Household**

You may ask for other identifying information for data collection but you may not make this a requirement to receive food.

You must receive DES/HRP approval before altering sign in sheet.

<u>You may not ask for social security number or proof of citizenship</u>

Pop Quiz !

Scenario # 1

A large public agency runs a number of different programs.

- It accepts federal funding or USDA commodities .
- It also operates food pantries that are stocked and funded entirely by community donations without Federal commodities or other funding.

Do the pantries have to adhere to federal civil rights rules?

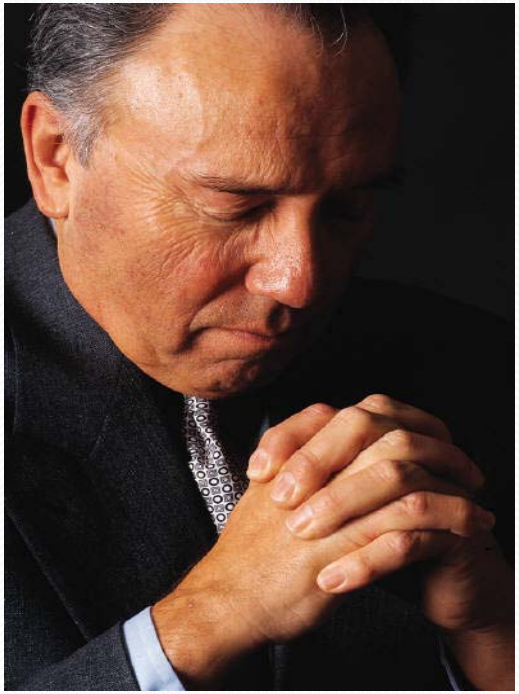
Answer # 1

Yes. If a program accepts federal assistance for one program, they are obligated to adhere to federal civil rights requirements in all aspects of their operations.

- Also, if discrimination is found and the recipient of the federal financial assistance refuses or fails to correct the problem, federal assistance from ALL sources (*i.e. all federal agencies that provide assistance*) needs to cease.

Scenario # 2

- **As part of its meal a soup kitchen wants to require a prayer before the meal.**



Is this allowable,

and are there any exceptions

or special requirements?

Answer # 2

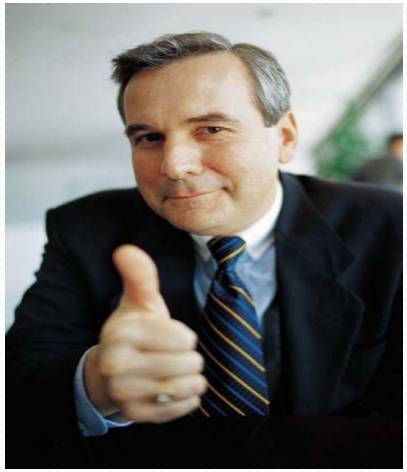
Although proselytizing is prohibited under the faith based rules, a prayer may be said before a meal.

The person leading the prayer must make it clear that:

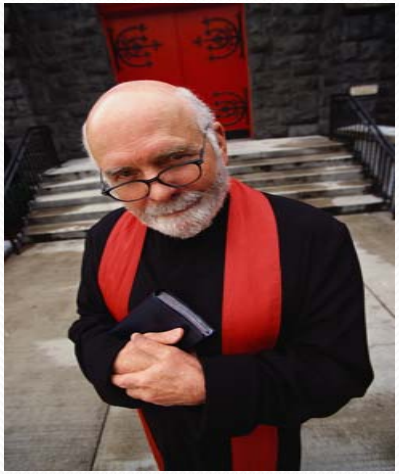
- the activity is not part of TEFAP and not endorsed by USDA;
- cooperation and participation in the activity is not a condition of receipt of TEFAP benefits; and
- the activity is not conducted in a manner that disrupts TEFAP commodity distribution or meal service.

Scenario # 3

- An organization wants to enclose religious literature with the food boxes.
- Another organization wants to include political advertising on its distribution bags.



Is this allowed?



Answer # 3

Neither is allowed

- Federal commodity outlets may not engage in any political or religious activities when distributing food.
- This includes distributing written items or allowing politicians to campaign during the food distribution.
- You may include resource information about other low income assistance programs.

Scenario # 4

- You are approached by someone from a local television station who would like to do a feature story on your program and interview some of the participants.

What should you do?

Answer # 4

Consider and respect the following:

- ✓ Importance of informing public about issues and program services.
- ✓ Privacy rights of clients.
- ✓ Client choice in appearing as recipient.
- ✓ Agreement on filming parameters.

Scenario # 5

- The leader of a charitable organization that makes large donations to the operations of a food pantry, requests a list of all Hispanic participants so that they can be given special holiday baskets.

Does this pose any civil rights problems and how should you respond to this request?

Answer # 5

This poses a number of civil rights problems.

- First, it would **violate the confidentiality** provisions of data collection. Data on ethnicity and race must be kept confidential and should not be made available on an individual basis.

- Second, what this person proposes to do is to distribute only to Hispanic people. By complying with the request, the food pantry would be helping to **discriminate** against non-Hispanic people, and this is not allowed.

Scenario # 6

- A person who is not eligible nor has never applied for TEFAP wants to file a civil rights complaint about disability access at a TEFAP site.

Since the person has no connection to the program, what should you tell that person?

Answer # 6

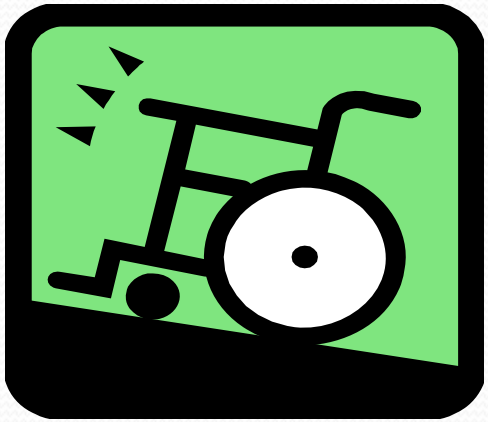
Inform person on how to file a complaint

- Anyone can file a discrimination complaint. In this case, someone appears to have observed conditions that violate civil rights laws, and the person is entitled to step forward to voice his/her concerns.
- The allegations would be investigated by the USDA as they would be in any complaint.

Scenario # 7

- A food pantry that receives Federal or State financial/food assistance is not accessible to people with wheelchairs.

What are some possible solutions to this problem?



Answer # 7

Possible solutions might include:

- Completing the intake and distribution in another area of the building that is accessible.
- Having an authorized representative/proxy pick up commodities for the person.
- Making home deliveries, or providing other accommodations.

Talk with the client to see what might work best for their situation.

Scenario # 8

- **Representatives from an ethnic minority group contact you and insist that you must provide ethnic food choices or you are discriminating.**

Is their complaint legitimate and why?

Answer # 8

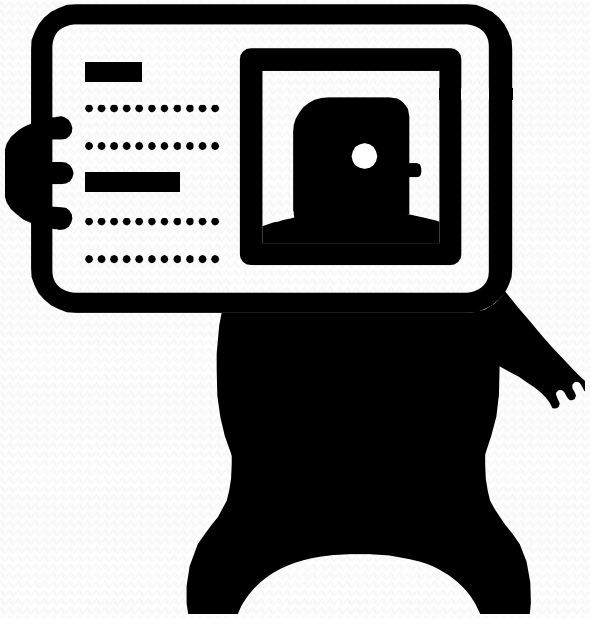
There are no provisions in the current laws or regulations to mandate ethnic food choices.

- Pantries may allow people to select food that meets the needs of their family and minimizes waste.
- Providing different ethnic groups with different food packages could result in discrimination since there might be inequities in the value and types of foods provided.

Scenario # 9

- A person shows up at a distribution site for the first time and does not have any form of ID.

What should you tell that person?



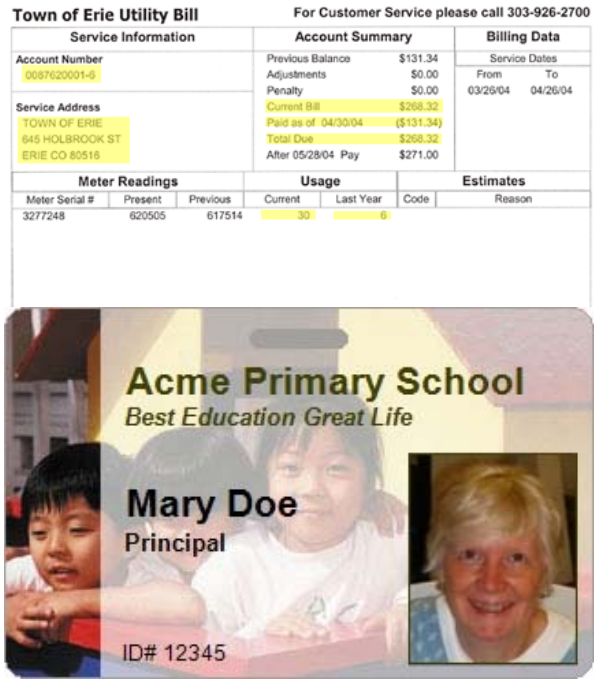
Answer # 9

Give the person an emergency food box and inform them of the necessary documentation to receive a food box for next time.

Scenario # 10

- **What forms of identification may you accept for the TEFAP food box?**

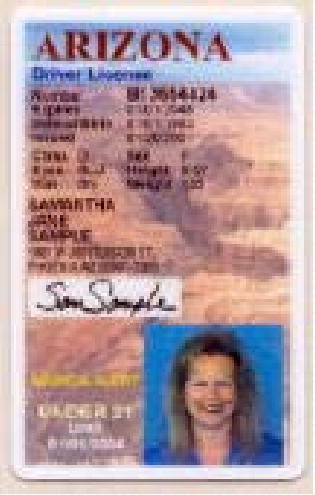
Identification



Town of Erie Utility Bill — For Customer Service please call 303-926-2700

Service Information	Account Summary		Billing Data	
Account Number	Previous Balance	$131.34	Service Dates	
0087620001-6	Adjustments	$0.00	From	To
	Penalty	$0.00	03/26/04	04/26/04
Service Address	Current Bill	$268.32		
TOWN OF ERIE	Paid as of 04/30/04	($131.34)		
645 HOLBROOK ST	Total Due	$268.32		
ERIE CO 80516	After 05/28/04 Pay	$271.00		

Meter Readings			Usage		Estimates	
Meter Serial #	Present	Previous	Current	Last Year	Code	Reason
3277248	620505	617514	30	6		



Rental Contract

In consideration of the agreements of the Resident(s), known as: **Mary and Davis Goodpenny.**_The owner hereby rents them the dwelling located at 1210 Penny Lane, for the period commencing on the _1___day of _____June_____, 2010___, and monthly thereafter until the last day of _____June_____, 2012____, at which time this Agreement is terminated. Resident(s), in consideration of Owners permitting them to occupy the above property, hereby agrees to the following terms:

Scenario 11

- Some people come to the pantry and do not speak English. You cannot understand them and have no idea what language they are speaking.
- You write a note saying that they need to return with an interpreter.

Is this acceptable or should something else be done?

Answer #11

No, this is not the proper way to handle this situation.

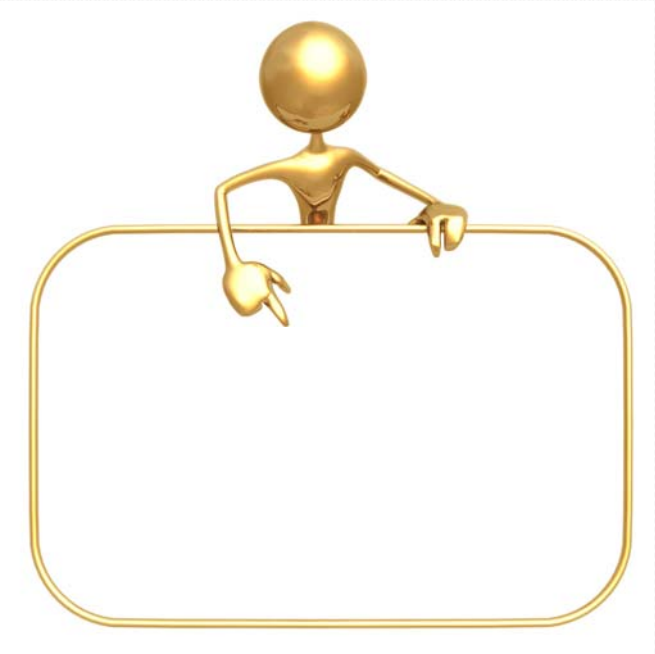
Attempts should be made to provide assistance by using *"I speak" cards, to determine if a language phone line might need to be utilized.*

http://www.lep.gov/ISpeakCards2004.pdf

http://www.fns.usda.gov/documents-available-other-languages

Question # 12

- What signage must be posted at your program that directs people, “how to file a civil rights complaint”?



- This is the "**And Justice for All**" poster available through the U.S.D.A. It details a person's civil rights and how a person can file a civil rights complaint. It must be posted in a visible area of any agency that receives TEFAP funds or commodities.

AMERICANS WITH DISABILITIES ACT/504 REHABILITATION ACT ADA/504 NOTICE

It is the policy of _____ not to discriminate on the basis of disability in admission to, access to, or operation of its programs, services, and activities or in its hiring and employment practices.

Individuals with disabilities who need accommodation, including auxiliary aids for effective communication in programs, services, or activities, are invited to make their needs and preferences known to the office staff.

Questions, concerns, complaints, or requests for additional information may be forwarded to :

Name:	Agency:
Days/Hours Available:	Address
Telephone No:	TDD No:

Department of Economic Security/Hunger Relief Program
Income Eligibility Guidelines
Effective from July 1, 2015 to June 30, 2016
185 % of Federal Poverty Level

Household Del Hogar	Annual Anual	Monthly Mensual	Twice Monthly Dos veces al mes	Bi-Weekly Dos veces a la semana	Weekly Semanal
1	$21,775	$1,815	$908	$838	$419
2	$29,471	$2,456	$1,228	$1,134	$567
3	$37,167	$3,098	$1,549	$1,430	$715
4	$44,863	$3,739	$1,870	$1,726	$863
5	$52,559	$4,380	$2,190	$2,022	$1,011
6	$60,255	$5,022	$2,511	$2,318	$1,159
7	$67,951	$5,663	$2,832	$2,614	$1,307
8	$75,647	$6,304	$3,152	$2,910	$1,455
For Each add'l member, add	+$7,696	+$642	+$321	+$296	+$148

Federal Register / Vol. 80 No. 61/Tuesday March 31, 2015/Notices
The U.S. Department of Agriculture (USDA) prohibits discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal and, where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)
If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email atprogram.intake@usda.gov.
Individuals who are deaf, hard of hearing, or have speech disabilities and wish to file either an EEO or program complaint please contact USDA through the Federal Relay Service at (800) 877-8339 or (800) 845-6136 (in Spanish).
Persons with disabilities who wish to file a program complaint, please see information above on how to contact us by mail directly or by email. If you require alternative means of communication for program information (e.g., Braille, large print, audiotape, etc.) please contact USDA's TARGET Center at (202) 720-2600 (voice and TDD). USDA is an equal opportunity provider and employer.

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Department of Economic Security/Hunger Relief Program
Linda Hamman Lhamman@azdes.gov 602-542-5071

❖ POSTED NOTICES

Annual Civil Rights Training Form

All organizations participating in The Emergency Food Assistance Program, including Regional Food Banks and their distribution agencies are required to participate in the Civil Rights training.

It will be the responsibility of all organizations to have, at a **minimum,** one person participate in DES conducted webinar or in person training and ensure training material is shared with all staff (paid and volunteer).

Organizations must create a plan to monitor and track all staff and volunteers **annual** compliance with this requirement.

HRP-1015A FORFF (4-15)

ARIZONA DEPARTMENT OF ECONOMIC SECURITY
Division of Benefits and Medical Eligibility (DBME)
Coordinated Hunger Relief Program

The Emergency Food Assistance Program (TEFAP)
Annual Civil Rights Training

Food Nutrition Services (FNS) requires civil rights training for people involved in all levels of the administration of programs that receive Federal financial assistance. Staff and all frontline volunteers, such as individuals who regularly interact with program applicants and participants who determine eligibility must receive full civil rights training on an annual basis as outlined in FNS Instruction 113-1, Section XI.

There is flexibility in how the training is provided. Note below how you participated in the required training.

☐ Instructor led training? Date: _____

☐ Review of Power Point? Date: _____

☐ Webinar? Date: _____

NAME *(Print or type)*	SIGNATURE	DATE

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Equal Opportunity Employer/Program • Under Titles VI and VII of the Civil Rights Act of 1964 (Title VI & VII), and the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and Title II of the Genetic Information Nondiscrimination Act (GINA) of 2008; the Department prohibits discrimination in admissions, programs, services, activities, or employment based on race, color, religion, sex, national origin, age, disability, genetics and retaliation. The Department must make a reasonable accommodation to allow a person with a disability to take part in a program, service or activity. For example, this means if necessary, the Department must provide sign language interpreters for people who are deaf, a wheelchair accessible location, or enlarged print materials. It also means that the Department will take any other reasonable action that allows you to take part in and understand a program or activity, including making reasonable changes to an activity. If you believe that you will not be able to understand or take part in a program or activity because of your disability, please let us know of your disability needs in advance if at all possible. To request this document in alternative format or for further information about this policy, contact 602-542-0303; TTY/TDD Services: 7-1-1. • Free language assistance for DES services is available upon request.

You have completed 2015-2016 TEFAP Civil Rights Training

Program Responsibilities

DES/TEFAP Agencies Household & Congregate

- Must include public notification:
  - Program Availability
    - Days and Hours of operation
  - Complaint Information
    - Where and how to file a complaint
  - Nondiscrimination Statement
    - All outreach materials must include non discrimination statement

Program Availability

Days and Hours of Operation

Complaint Information

Where and How To File a Complaint

Non Discrimination Statement

All Outreach Materials must include Non discrimination Statement

Public Notification

DES/TEFAP Agencies Household Distribution

- Must be posted adjacent to sign in sheet:
  - "Justice For All Poster"
  - ADA 504 Notice
- Customers must sign:
  - Household Distribution Sign In Sheet
- Income Guidelines must be posted:
  - next to Sign In Sheet
- You may not ask or track customers by their Social Security number

DES/TEFAP Agencies Congregate Meals

- Must be posted at site:
  - "Justice For All Poster"
  - ADA 504 Notice

Distribution

TEFAP Policy and Procedures Manual
Section 8-2

- Federal regulation does not specify the number of distributions Regional Food Banks (RFB) are required to conduct. They may use their discretion in the number of distributions they feel are needed per month per site. Frequency of distribution must be at a **minimum monthly;** and meet the following criteria:

- Income eligible recipients must have equal **access** to receiving the same amount of TEFAP food. RFB's must ensure that each recipient has equal **access** to the same possible amount of food at each distribution site.

- RFB's should ensure that TEFAP food is distributed in fair share proportions per household size. A household of four should receive proportionally twice that of a household of two.

  Household Size: 2-4 = One Box

  Household Size: 4-6 = One Box and supplemental bag
  Household Size: 6-8 = One Box and 2 supplemental bag

  Household Size 8-up = Two Boxes and Two supplemental bags

- Distribution site personnel must document that households are receiving amounts of TEFAP food in fair share proportions according to family size.

Distribution

RFB/DistributionSites Agreements

- RFB's must have written agreements with their Distribution Sites (DS) before they may receive TEFAP food and/or administrative funds (*Final Rule, Sec. 251.2*).
- Agreements with DS must be approved by DES/CHRP initially and subsequently when substantive changes are initiated.
- Agreements between RFB's and DS's must include:
  - a statement that the DS agrees to operate in accordance with requirements of parts 250 and 251 of 7 CFR (Final Rule, Sec. 251.2);
  - the name and address of the DS receiving commodities and/or administrative funds (Final Rule, Sec. 251.2).

DES/Hunger Relief Program Monitoring

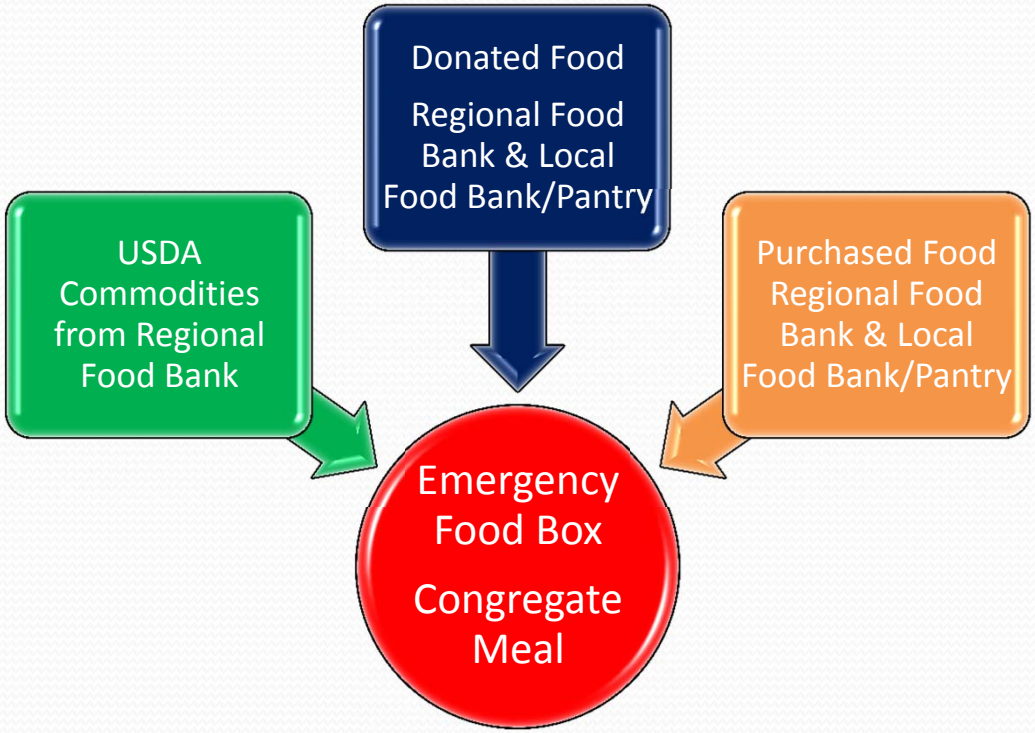
- 20 Distribution Sites per year which includes:
  - Recipient eligibility procedures
  - Records and reporting requirements
  - Storage and inventory requirements
  - Civil Rights
  - Required postings
  - Outreach Materials
  - Customer Service
  - Required training

Agency Monitoring

- RFB's must conduct monitoring visits with 50% of their Agency/Distribution Sites per year.
- Monitoring tools and corrective action policies must be approved by HRP.
  - Must have corrective action policies which include timelines and cause for termination.
  - Must publish and provide policies to their Agencies.
  - Civil Rights Policy and Procedure

- **Emergency Food Box may contain a combination of one or all sources of food.**

- **Congregate Meal may contain a combination of one or all food sources.**



Data Reporting

of Meals Served

# of Emergency Food Boxes

# of Households Served

# of Individuals Served

- Monthly Participation Report

TEFAP Monthly Inventory and Participation Report (MIPR)
Distribution Sites

Instructions: Complete this form as of the last business day of the month. By the 5th of the following month, mail, fax, or email to the ERA from which you receive USDA commodities.

Reporting Period: _____
(month / year)

Type of emergency food distribution:

- ☐ **Congregate meals**
  # of meals served: _____
- ☐ **Emergency Food Boxes**
  # of emergency food boxes distributed: _____
- ☐ **Household distribution**
  # of households served: _____
  # of individuals served: _____

Commodity name	# Cases in inventory	# Cases received	Date received	Pack date

Distribution Site:_____**Date:**_____
Signature:_____

Volunteer Confidentiality Form

All staff and volunteers must sign a confidentiality agreement annually.

HRP-1016A FORFF (7-14)

ARIZONA DEPARTMENT OF ECONOMIC SECURITY
Division of Benefits and Medical Eligibility (DBME)
Coordinated Hunger Relief Program

The Emergency Food Assistance Program (TEFAP)

Volunteer Confidentiality

As a volunteer of the Arizona Department of Economic Security / Hunger Relief Program/ Agency Name and providing services associated with the federal emergency food assistance program (TEFAP) commodities at food pantries, soup kitchens and shelters, I understand that all information regarding the individuals and households receiving food assistance must be maintained in the strictest confidence. I have a legal and ethical responsibility to protect the confidentiality and security of all protected data and information to which I have access in carrying out my duties. Confidential information may include, but is not limited to: recipients of food assistance; household composition, names, addresses, and phone numbers. It may be from any source or in any form (oral, written or electronic). This information may be protected by state and federal laws and by policies of the Department.

I agree to keep confidential any individual and household information I may obtain either directly or indirectly during the course of my volunteer work at locations that provide services related or directly involved with the distribution of TEFAP commodities.

NAME *(Print or type)*	SIGNATURE	DATE

Equal Opportunity Employer/Program • Under Titles VI and VII of the Civil Rights Act of 1964 (Title VI & VII), and the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and Title II of the Genetic Information Nondiscrimination Act (GINA) of 2008; the Department prohibits discrimination in admissions, programs, services, activities, or employment based on race, color, religion, sex, national origin, age, disability, genetics and retaliation. The Department must make a reasonable accommodation to allow a person with a disability to take part in a program, service or activity. For example, this means if necessary, the Department must provide sign language interpreters for people who are deaf, a wheelchair accessible location, or enlarged print materials. It also means that the Department will take any other reasonable action that allows you to take part in and understand a program or activity, including making reasonable changes to an activity. If you believe that you will not be able to understand or take part in a program or activity because of your disability, please let us know of your disability needs in advance if at all possible. To request this document in alternative format or for further information about this policy, contact 602-542-0303; TTY/TDD Services: 7-1-1. • Free language assistance for DES services is available upon request.

Training

- Annual civil rights and program training is mandatory for frontline staff or volunteers who interact with program applicants or participants and supervisors of frontline staff.

Resources

DES Coordinated Hunger Relief Program Policy and Procedures Manual

www.azdes.gov

TEFAP Frequently asked Questions

Thank You!

Hunger Relief Program Manager-Linda Hamman
Lhamman@azdes.gov

Program Specialist-Gloria Garcia-Hernandez
ggarcia-hernandez@azdes.gov

Program Specialist Joseph Wefer
jwefer@azdes.gov

Assistant Janel Dorame
JXDorame@azdes.gov