

Comprehensive Civil Rights Plan (CCRP)

October 2025

Inquiries on Civil Rights, Americans with Disabilities Act (ADA), or Limited English Proficiency (LEP)

Civil Rights Coordinator

Washington County Community Services

14949 62nd Street North, Stillwater, MN 55082

Coordinator Email: askcommunityservices@WashingtonCountyMN.gov



This CCRP is posted in the lobby of all our service centers and is available at the reception desk.

I. Purpose

As a recipient of federal financial assistance, Washington County Community Services is responsible for providing core services to assist and support Minnesota's most vulnerable individuals and families so they can meet their basic needs and be treated with respect and dignity. Washington County Community Services has a Comprehensive Civil Rights Plan (CCRP) to ensure that all eligible individuals receive equal access to program services and information. Its programs are operated in a nondiscriminatory way, without regard to race, color, national origin, age, disability, sex, sexual orientation, religion, political beliefs, creed and public assistance status. In medical programs, sex includes sex stereotypes and gender identity under any health program or activity receiving federal funds. This CCRP also serves as a source of information for county agency staff and the public. It sets out Washington County Community Services 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.

II. Equal Opportunity Policy and Procedure

Washington County will provide equal opportunity to all employees and applicants for employment in accordance with applicable Equal Employment Opportunity laws, directives and regulations of federal, state and local governing bodies or agencies thereof, specifically MN Stat § 363A and Human Resources Policy #5017.

III. Complaint Resolution Procedure

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

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

If Complainants need assistance to file a complaint or need interpretation services, they may contact the Civil Rights Coordinator. Reasonable accommodations will be provided to individuals with disabilities, limited English proficiency, or others who are unable to file a written complaint. Please contact askcommunityservices@WashingtonCountyMN.gov for assistance.

IV. Limited English Proficiency Plan (LEP)

The LEP Plan, Attachment B, explains how we help people who do not speak English as their main language access our services. It describes how we provide interpreters, translated materials, and other language assistance to ensure everyone can understand and use our programs equally.

V. Civil Rights Training

All new Washington County Community Services employees will complete civil rights training within their first six months of employment. This training is accessible on DHS's TrainLink site presented by the Minnesota Department of Human Services and is tracked within Community Services - documenting the date of the training each year and attendees.

The Washington County Community Services Deputy Director has signed the *2025 Civil Rights Assurance of Compliance*. A copy is in Attachment C.

VI. CCRP Administration

Washington County Community Services will:

- Post the cover page of the CCRP in the agency service center lobbies and members of the public can request the entire document at the reception desk. Community Services employees can review this on our internal SharePoint Site.
- Post the CCRP on the agency's public website.
- Review the CCRP annually with ALL staff.
- For the benefit of applicants, clients and members of the public, prominently post in service center lobbies a copy of the equal opportunity policy and procedure that includes provisions prohibiting disability discrimination and a copy of its civil rights complaint procedure.
- Post a copy of the DHS brochure: *Do you have a disability* (DHS-4133-ENG) in all service center lobbies.
- Conduct annual SNAP civil rights training for all staff who administer the SNAP program and all staff who have direct contact with the public including support staff, supervisors and managers. Washington County Community Services will document the date of the training each year and document who attends the training.

VII. Legal Authorities

Washington County's Civil Rights program is governed by many legal authorities, including, but not limited to, the list below and on the [county website](#).

- Title VI of the Civil Rights Act of 1964 (Public L. No. 88-352), as amended, 42 USC § 2000d, et seq.
- Civil Rights Restoration Act of 1987 (Public L. No. 100-259, 102 Stat. 28 (1988), also found at 42 USC § 2000d, et seq.)
- 42 USC §§ 4601 to 4655
- 23 USC § 109(h)
- Executive Order 12250
- Executive Order 12898
- Executive Order 13166
- 23 CFR § 200
- 28 CFR § 50.3
- 49 CFR § 21
- 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)
- Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.)
- Section 11(c) of the Food and Nutrition Act of 2008, as 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.

Community Services Limited English Proficiency Plan (LEP)

October 2025

Inquiries on Civil Rights, Americans with Disabilities Act (ADA), or Limited English Proficiency (LEP)

Civil Rights Coordinator

Washington County Community Services
14949 62nd Street North, Stillwater, MN 55082

Coordinator Email: askcommunityservices@WashingtonCountyMN.gov



Purpose

The following document serves as Washington County Community Services' plan to meet the legal obligation of limited English proficiency requirements in compliance with:

- Title VI of the Civil Rights Act of 1964; 42 U.S.C. § 2000 et seq; 45 CFR §80, Nondiscrimination Under Programs Receiving Federal Financial Assistance Through the U.S. Department of Health and Human Services Effectuation of Title VI of the Civil Rights Act of 1964.
- Office of Civil Rights Policy Guidance, 65 Fed. Reg. 52762 (2000), Department of Health and Human Services, Office of Civil Rights (OCR), Policy Guidance on the Prohibition Against National Origin Discrimination As it Affects Persons With Limited English Proficiency (August 30, 2000); OCR Website: www.hhs.gov/ocr/lep/
- Department of Justice Regulation, 28 CFR § 42.405(d)(1), Department of Justice, Coordination of Enforcement of Nondiscrimination in Federally Assisted Programs, Requirements for Translation.
- Program administration and personnel requirements, 7 CFR §272.4.

Policy and Procedures

A. Persons Covered by LEP Plan

Washington County Community Services' Limited English Proficiency (LEP) plan is being updated based on an increasing need for interpreter services to serve our customers, prospective customers, and their families who do not speak English or who speak limited English.

B. Definitions:

LEP Person An individual has Limited English Proficiency (LEP) if they are not able to speak, read, write or understand the English language at a level that allows him/her to interact effectively with Human Services staff.

Interpretation is defined as a spoken or visual explanation provided to enable two or more individuals who do not speak the same language to communicate with each other.

Translation is defined as a written version of a document that is provided in a language different than that of the original document.

C. Commitment to Meaningful Access

No person will be denied access to Washington County Community Services program information or programs because they do not speak English or communicates in English on a limited basis.

Washington County will help all customers with LEP in obtaining necessary interpreter services for him/her to effectively communicate with staff. Customers will be provided with meaningful access to programs and services in a timely manner and at no cost to the customer.

D. Offering Language Assistance Services

Monitors in our reception area include interpreter services access to assist our LEP customers. Staff will initiate an offer for language assistance to customers who have difficulty communicating in English, have difficulty reading their spoken language, or when a customer asks for language assistance. Staff must offer, without charge, interpretation and/or translation services to people with LEP in a language they understand, in a way that preserves confidentiality, in a timely manner.

Staff will appropriately code state computer system language fields with clients preferred language to ensure identification of individuals potentially requiring LEP services.

E. Telephone Interpreter Services – Non-English

Attachment A. Staff will become familiar with how to use this service. Being familiar with the service will help staff act quickly when customers need interpreter assistance.

F. Telephone Interpreter Services - Hearing Impaired

For customers who are hearing impaired, **Minnesota Relay** is available by dialing **711**. If in-person assistance is required, please refer to Attachment A for additional support options.

G. Documents or Communications to/from People We Serve

Documents going to or from people will be translated as requested – see Attachment A.

H. In-Person Interpreter Services

In-person meetings where an interpreter is requested – see Attachment A.

I. Procedure for Using and/or Distributing Forms – Non-English

Washington County Community Services has access to several forms from DHS which are available in languages other than English. Staff also have access to forms on the MAXIS system and through DHS at: www.dhs.state.mn.us/Forms.

J. Bilingual Staff

To enhance our ability to provide culturally appropriate services, Washington County employs bilingual staff in a variety of positions that may interact with people in their primary language.

K. Using Adult Family and/or Friends as Interpreters

Staff should never require, suggest, request, or encourage a customer with LEP to use family or friends as interpreters. Use of family or friends could result in a breach of confidentiality or reluctance on the part of the customer to reveal personal information that may be critical to their situation. Family or friends may not be competent to act as interpreters because they may not be proficient enough in both languages, may lack training in interpretation, or have little familiarity with specialized program terminology. If the LEP person declines this service, the worker will document in case notes that services were offered and declined.

L. Using Minor Children as an Interpreter

Minor children should never be used as interpreters.

M. When Customer Declines Services

When a customer declines services, note this in the case notes.

Competency Standards for Interpreters

Agencies have provided documentation that will provide competent and experienced interpreters.

Competency includes:

- Being bilingual and fluent in both English and the language of the LEP client
- Accuracy and completeness
- Impartiality
- Confidentiality
- Accreditation when appropriate

Interpreters will have training/orientation that includes:

- The skills and ethics of interpreting
- Basic knowledge in both languages of specialized program terms or concepts
- Sensitivity to the customer’s culture

Notice of Rights to Language Assistance

Washington County Community Services staff will inform all customers with LEP of the right to free interpreter services and that these services must be provided in a timely manner during normal business hours.

Washington County Community Services staff will use I Speak cards to help customers with LEP to be able to identify their language needs for staff. Posters will also be used in the agency to inform customers that language interpreters are available to them at no cost.

LEP Training

Washington County Community Services will distribute the LEP plan to all staff once approved by DHS so they can learn the policies and procedures required to make language assistance available to our customers with LEP. Included in this plan are Guidelines for Working with an Interpreter. New employees will have the LEP plan incorporated into their New Employee Orientation.

LEP training will include legal obligation to provide language assistance to customers with LEP, policies and procedures to access language assistance services and how to properly document information about the customer's language needs in the case file. All staff with ongoing customer contact are required to receive LEP updates annually.

Monitoring of the LEP Plan

An evaluation will be conducted annually to determine the overall effectiveness of the plan. It will assess the current language needs of these customers to determine if these needs are being met. It will assess if our staff understand the LEP policies and procedures, know how to carry them out, and whether language assistance resources are still current and accessible.

A. LEP Plan Posted for Public Review

The Washington County Community Services LEP plan will be posted to the public in the reception area. The LEP plan will be available in English, but interpreters will be available to translate the plan for those who do not speak English who wish to read it.

B. Distribution of LEP Plan

Immediately upon approval, the Washington County Community Services LEP plan will be communicated and available to all staff.

ATTACHMENT A

INTERPRETER INSTRUCTIONS

[Piedmont Global Language Solutions \(PGLS\)](#)

855-712-7709

[Propio](#)

651-401-4961 (Back-up service line: 1-866-386-1284)

Global Language Connections (GLC)

888-316-8598

[Weaving Cultures](#)

763-432-3225

[Multilingual Connections](#)

(Back up service line: (866) 386-1284 use if interpreter is unavailable at number above)

COMMUNICATION TO/FROM PEOPLE WE SERVE - Email one of the providers below and attach the document in the email (subject SECURE):

- Global Language Connections - email translations@globallanguageconnections.com
- Piedmont Global Language Solutions (PGLS) - email translation@pglsinc.com
- Weaving Cultures - email translations@weavingcultures.com
- Propio - email translate@propio.com

For in-person interpreter services:

- **Piedmont Global Language Solutions (PGLS)**
- **Global Language Connections**
- **Keystone Interpreting Solutions** Directly email Keystone Interpreting Solutions to schedule info@kisasl.com
- **Weaving Cultures**

Guidelines for Working with an Interpreter

General Guidelines:

- Be sure to speak directly to your customer, not the interpreter.
- Use words, not gestures, to convey your meaning.
- Speak in an audible tone and speak slowly.
- Explain jargon and technical terms to the interpreter when necessary.
- Use simple vocabulary.
- Speak in short sentences and pause to allow the interpreter to speak.
- Ask one question at a time.
- Control of the environment.

To assist the customer, if appropriate:

- Ask your customer if they feel they understand your question and if they need to ask any questions themselves.
- Ask your customer if there is something in their culture

that makes this situation different, hard to understand, difficult or embarrassing

- Ask your customer if they need anything re-explained and if your message is not understood, be prepared to say it differently.
- If you think that your message may not be fully understood by your customer, double check by saying "Tell me what you understand."

To assist the interpreter:

- Allow the interpreter to stop you and seek clarification when necessary.
- Allow the interpreter to take notes if things get complicated.
- Allow the interpreter to clarify cultural issues if appropriate.



2024-2026 STATE-COUNTY CIVIL RIGHTS ASSURANCE AGREEMENT

The County Agency Washington County Community Services 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

Beth Pierce

Print Name

Washington County Community Services

Name of County Agency

14949 62nd St N
Stillwater, MN 55082

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