



## CIVIL RIGHTS TRAINING CHECKLIST

(To be Completed Annually for All Staff & Volunteers Assisting with TEFAP)

*(The Emergency Food Assistance Program)*

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### Goals of Civil Rights

- Ensure fairness and equality in treatment and benefit delivery.

### Legal Prohibitions

Discrimination is prohibited based on:

- **Race**
- **Color**
- **National Origin**
- **Age**
- **Sex**
- **Disability**

*Programs funded by the USDA, including the Supplemental Nutrition Assistance Program (SNAP) and the Food Distribution Program on Indian Reservations (FDPIR), also prohibit discrimination based on religion and political beliefs.*

### Types of Discrimination

- **Disparate Treatment** – Intentional discrimination.
- **Disparate Impact** – Neutral rules that disproportionately affect a group.
- **Reprisal/Retaliation** – Retaliation against a complainant, their family, associates, or others involved in the complaint process or exercising civil rights.

### Exceptions

Congress may establish programs intended for specific groups (e.g., age-based programs). Exclusion of those who don't meet eligibility is not considered discrimination.

### When Do Civil Rights Rules Apply?

Civil rights rules apply whenever federal financial assistance is involved. This includes not just cash but also commodities, training, equipment, and other goods or services.

### Special Circumstances

- **Accommodating Disabilities:**  
Ensure that sites are accessible to individuals with disabilities (mobility, vision, hearing, etc.). If this is not possible, provide alternative means of service delivery and advertise these options.
- **Language Assistance for LEP (Limited English Proficiency) Individuals:**  
Provide necessary language assistance to LEP individuals to ensure they can access the program. Assistance may vary depending on the situation but must always be offered.

### Other Requirements

- **Treat all individuals with dignity and respect.**
- **USDA "And Justice for All" Poster:**  
Display this non-discrimination poster in a location visible to all visitors.
- **USDA Non-Discrimination Statement:**  
Include this statement on all materials and websites that mention USDA-funded programs.



- **Collect Racial/Ethnic Data:**

In the Commodity Supplemental Food Program (CSFP), collect racial/ethnic data to assess participation and target outreach efforts. Keep all individual data confidential.

- **Conduct Outreach:**

Ensure that eligible individuals are aware of the program and know how to apply. Provide suggestions for improving outreach efforts.

- **Maintain Confidentiality:**

Avoid discussing or making remarks about those receiving benefits. Never share information and direct all inquiries to management. The exception is illegal or inappropriate behavior, which should be reported to state or federal authorities.

- **Cooperate with State and Federal Reviewers:**

Periodic compliance reviews are required to ensure adherence to program and civil rights rules. Voluntary compliance is sought in case of non-compliance, but failure to abide can lead to a loss of federal financial assistance.

- **Sexual Harassment Prohibition:**

Sexual harassment, including unwanted jokes, touching, or requests for sexual favors, is prohibited. Report any violations to management, state, or federal officials.

- **Complaint Procedures:**

If someone alleges discrimination, advise them to file a complaint by writing to:

**USDA Director, Office of Adjudication**

**1400 Independence Avenue SW**

**Washington, DC 20250-9410**

Or call toll-free: (866) 632-9992 (Voice). For hearing or speech disabilities, contact the Federal Relay Service at: (800) 877-8339 or (800) 845-6136 (Spanish).

USDA is an equal opportunity provider and employer.

- **Handling Conflict:**

If a conflict arises, remain calm. Seek assistance if you feel threatened. Consider mediation or involving a third party to resolve the situation.

Follow the **Platinum Rule** – treat people the way they would like to be treated.

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**Checklist Reviewed By:**

Name (please print): \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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*In accordance with Federal law and USDA policy, this institution is prohibited from discriminating based on race, color, national origin, sex, age, or disability. To file a discrimination complaint, write to USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue SW, Washington, DC 20250-9410 or call (202) 720-5964 (Voice and TDD).*

*Arlington Food Bank and USDA is an equal opportunity provider and employer.*