

STANDARD OPERATING PROCEDURE – ARP TEAM

USDA AGENCIES

Meeting the annual CIVIL RIGHTS TRAINING Requirement

(as of May 2013)

Background: In April 2013, Tom Moore, BRAFB's Regional Commodity Representative from the Virginia Department of Agriculture and Consumer Services, instructed BRAFB to begin ensuring that all volunteers at USDA agencies receive training on civil rights on an annual basis. This SOP describes the methods BRAFB will use to meet this requirement.

A. Food Bank Staff Training. Food Bank staff whose duties include overseeing USDA agency compliance should receive a training refresh annually. The annual update should include a review of the information outlined in the "Contents of Training" section below (as well as any updated material that VDACS provides), along with a discussion of typical agency questions.

B. Setting the Expectation with Agencies.

1. Announcement at USDA Meetings. The civil rights training requirement should be announced and explained at each annual USDA agency meeting. Training materials should also be distributed.
2. Annual Agreement. BRAFB's annual agreement with USDA agencies (which we typically sign at the same time that the annual Addendum from VDACS is signed) should articulate the civil rights training requirement.
3. New USDA Agencies. Orientation for new USDA agencies should include a discussion of this requirement.

C. Methods for meeting the training requirement. Agencies can meet the training requirement by either sending agency volunteers to a BRAFB training session or conducting their own training sessions.

1. Agency Self-Train. Agencies may elect to provide training directly to volunteers using the information and documents described below in the "Contents of Training" section. Training may be in group settings or one-on-one. However, BRAFB should advise that only agency leaders and/or volunteers who have themselves been trained by BRAFB staff may conduct the training.
2. BRAFB Training. BRAFB will strive to provide two civil rights training opportunities each year in each branch area. One training will take place during or in conjunction with the annual USDA agency meeting. A second training may be offered at another time of year, perhaps in conjunction with an Agency Roundtable or other gathering.

D. Contents of Training.

1. Information. The training should convey the following information:

All USDA agencies must take certain steps to ensure that TEFAP food is available to the whole community and that community members are aware of the availability of this food.

- (a) Agencies must serve all people regardless of race, color, national origin, age, sex, or disability.
- (b) Agencies must let people know about their rights by:
 - Posting the *And Justice for All* poster where it can be seen easily,
 - Including the Nondiscrimination Statement (which appears on the poster) on all public written materials describing the pantry,
 - Notifying community groups that the program is available,
 - Responding promptly to inquiries about the program, and
 - Scheduling hours of operation that suit the community's needs.

- (c) Agencies must accommodate language needs by:
- Identifying out what languages are spoken in the community,
 - Providing translated written materials if there are many people who speak a language other than English, and
 - Taking reasonable efforts to provide volunteers (or staff) who can serve as interpreters.
- (d) Agencies must accommodate persons with disabilities by allowing them to use proxies or alternates to pick up food or making other reasonable physical accommodations at the distribution sites.
- (e) Agencies must respond appropriately if a person states that he or she has been treated differently because of race, color, national origin, age, sex, or disability by:
- Trying to resolve the issues quickly,
 - Offering the client a Civil Rights Complaint form, and
 - Offering to provide postage to mail the completed Civil Rights Complaint form to USDA.

2. Documents. All trainees should receive the following documents: BRAFB Quick Guide to Civil Rights; Civil Rights Complaint Form.

D. Methods to document training.

1. Documentation of Training. Each volunteer who receives training should sign a document to acknowledge that she or he has received training. In group settings, the document could be a sign-in sheet. (Note, however, that in a group setting where multiple agencies are represented, each agency should have a separate sign-in sheet. This will facilitate filing the sheets in appropriate agency files as described below.) In one-on-one trainings, the document could be a simple memo on which the individual acknowledges receiving the training. In any case, the document should include a summary outline of the topics that were covered during the training. There should also be a document signed by the agency leader stating that all current volunteers have received annual training. See Attachments A, B, and C for examples, all of which may be modified as needed.
2. Agency Files. No later than January 15, 2014, each USDA agency file (i.e. the central file located in Verona) should contain documentation of training (including both volunteer signatures and the agency leader's statement that all volunteers have been trained). Thereafter, all agency files should contain such documentation that is no more than one year old.
3. Monitoring. In addition to the documentation described above, at each monitoring visit, the PSC should ask about civil rights training compliance. The agency monitoring form has been revised as of May 2, 2013 to reflect the same.

Attachment B: Memo for one-on-one training

ANNUAL TEFAP CIVIL RIGHTS TRAINING FOR AGENCY VOLUNTEERS

Agency Name: _____ **Agency Number:** _____

Date of Training: _____

Topics covered: See comments above.

- (a) Agencies must serve all people regardless of race, color, national origin, age, sex, or disability.
- (b) Agencies must let people know about their rights by:
 - Posting the *And Justice for All* poster where it can be seen easily,
 - Including the Nondiscrimination Statement on all public written materials describing the pantry,
 - Notifying community groups that the program is available,
 - Responding promptly to inquiries about the program, and
 - Scheduling hours of operation that suit the community's needs.
- (c) Agencies must accommodate language needs by:
 - Finding out what languages are spoken in the community,
 - Providing translated written materials if there are many people who speak a language other than English, and
 - Taking reasonable efforts to provide volunteers (or staff) who can serve as interpreters.
- (d) Agencies must accommodate persons with disabilities by allowing them to use proxies or alternates to pick up food or making other reasonable physical accommodations at the distribution sites.
- (e) Agencies must respond appropriately if a person states that he or she has been treated differently because of race, color, national origin, age, sex, or disability by:
 - Trying to resolve the issues quickly,
 - Offering the client a Civil Rights Complaint form, and
 - Offering postage to mail the completed Civil Rights Complaint form to USDA.

Name of Trainee: _____

Signature of Trainee: _____

The Trainer affirms that he or she received Civil Rights Training from staff of the Blue Ridge Area Food Bank.

Name of Trainer: _____ **Signature of Trainer:** _____

**STATEMENT REGARDING ANNUAL CIVIL RIGHTS TRAINING
for TEFAP AGENCIES**

Agency Name: _____ Agency number: _____

Name of Person Completing this Statement: _____

Title of Person Completing this Statement: _____

I am a leader of the agency listed above. I hereby affirm that all volunteers presently participating in the distribution or handling of TEFAP commodities at this agency have received Civil Rights Training within the last 12 months, including the following topics: See comments above.

- (a) Agencies must serve all people regardless of race, color, national origin, age, sex, or disability.
- (b) Agencies must let people know about their rights by:
 - Posting the *And Justice for All* poster where it can be seen easily,
 - Including the Nondiscrimination Statement on all public written materials describing the pantry,
 - Notifying community groups that the program is available,
 - Responding promptly to inquiries about the program, and
 - Scheduling hours of operation that suit the community's needs.
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- (e) Agencies must respond appropriately if a person states that he or she has been treated differently because of race, color, national origin, age, sex, or disability by:
 - Trying to resolve the issues quickly,
 - Offering the client a Civil Rights Complaint form, and
 - Offering postage to mail the completed Civil Rights Complaint form to USDA.

Signature of Person Completing this Statement: _____

Today's Date: _____