

# ANOKA COUNTY

## Title VI Compliance and Civil Rights Plan

Adopted by the Anoka County Board of Commissioners

Anoka County Government Center  
2100 Third Avenue  
Anoka, MN 55303

Administration: 763-324-4700 FAX: 763-324-5490

Title VI & Civil Rights Coordinator/ADA Coordinator  
Dee Guthman, Deputy County Administrator  
763-324-4707

**This Title VI & Civil Rights Plan is posted at  
the Reception Desk on the first floor of the  
Anoka County Government Center and is  
available on the Anoka County Website  
[www.anokacounty.us](http://www.anokacounty.us)**

---

### **Americans with Disabilities Act Advisory**

This information is available in accessible formats to individuals with disabilities. For information about equal access to services, call 763-324-4700 or use your preferred relay service.

## TABLE OF CONTENTS

1. Policy/Purpose
2. Title VI and Civil Rights Coordinator Duties
3. Equal Opportunity Policy and Procedure
4. Americans with Disabilities Act – 504 Statement
5. Complaint Procedure
6. Complaint Notification Form
7. Limited English Proficiency Plan
8. Title VI and Civil Rights Assurance of Compliance
9. Title VI and Civil Rights Plan Administration
10. Appendix
  - Attachment A – Complaint Form
  - Attachment B – Civil Rights Assurance of Compliance

## 1. Policy/Purpose

The Anoka County Board of Commissioners is committed to complying with Title VI of the Civil Rights Act of 1964 as amended and all accompanying federal laws, regulations and directives.

This document is Anoka County's Plan (hereafter Plan) for compliance with the Title VI Civil Rights Act of 1964 and the accompanying federal laws. Anoka County is committed to ensure that no person will be denied the benefits or otherwise be subjected to discrimination in any of its programs or activities within Anoka County on the basis of race, color, creed, religion, national origin, sex, marital status, disability, status with regard to public assistance, sexual orientation, and age. This Plan also serves as a source of information for county agency staff and the general public. It sets out Anoka County's civil rights administrative policies and procedures, identifying key contacts within Anoka County. In addition, Anoka County will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency as outlined below.

When Anoka County distributes federal aid funds to another entity, the County will include Title VI language in all written agreements and will monitor them for compliance. This policy and procedure applies to all Anoka County departments and agencies, contractors, and elected officials.

## 2. Title VI and Civil Rights Coordinator Duties

Anoka County designates Dee Guthman, Deputy County Administrator, to serve as the agency's Title VI and Civil Rights Coordinator who will be the County's point person on civil rights matters.

Dee Guthman, Deputy County Administrator  
Anoka County  
Voice: 763-324-4707  
Or use your preferred relay service  
[Dee.Guthman@co.anoka.mn.us](mailto:Dee.Guthman@co.anoka.mn.us)

The Title VI and Civil Rights Coordinator's responsibilities include but are not limited to the following:

- A. Provide guidance and technical assistance on Title VI and Civil Rights matters and be responsible for the overall program, review required for Title VI compliance, develop procedures, and monitor for:
  - a. Prompt processing and resolution of Title VI complaints

- b. Collection of statistical data (race, ethnicity, color, national origin, sex, disability and age) on participants in, and beneficiaries of the county's programs, activities and services
  - c. Identification of discrimination
  - d. Elimination of discrimination when discrimination is found to exist
  - e. Prompt resolution in deficient areas
  - f. Regular review of county functions to ensure compliance with Title VI requirements
- B. Ensure Title VI and Civil Rights requirements are included in policy directives and that the procedures used have built-in safeguards to prevent discrimination.
- C. Correct Civil Rights problems or discriminatory practices or policies found when conducting self-monitoring and compliance review activities.
- D. Ensure discrimination complaints are fully investigated and allow for a formal review of the investigation.
- E. Assure that Title VI information for public dissemination is developed in languages other than English, where appropriate.
- F. Provide information to any complainant about where to file a discrimination complaint and refer discrimination complaints to the Minnesota Human Rights Division or The US Department of Justice Civil Rights Division or other applicable entity when appropriate.

### 3. Equal Opportunity Policy and Procedure

#### **Anoka County Equal Opportunity Policy and Procedure**

It is the policy of Anoka County to ensure that no person will be denied the benefits of or otherwise be subjected to discrimination under any program or activity within Anoka County on the basis of race, color, creed, religion, national origin, sex, marital status, disability, status with regard to public assistance, sexual orientation, and age, in compliance with all applicable civil rights laws.

Anoka County employees, services, programs, benefits and policies will not discriminate against applicants, clients, businesses or members of the public because of race, color, creed, religion, national origin, sex, marital status, disability, status with regard to public assistance, sexual orientation, or age.

This policy covers Anoka County's full range of services, programs and benefits. **The policy applies to the agencies and providers receiving federal and state funds under contracts, licenses and other arrangements with Anoka County.** The Minnesota Human Rights Act also applies to the work of Anoka County and those agencies carrying out its programs.

#### **4. Americans with Disabilities Act – 504 Statement**

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

Section 504 of the Rehabilitation Act of 1973 protects qualified individuals with disabilities from discrimination based on their disability in federally funded programs and services.

Title II of the Americans with Disabilities Act of 1990 (Title II of the ADA) protects qualified individuals with disabilities from discrimination on the basis of their disability when the discrimination occurs in state or local government services. An agency does not have to receive federal financial assistance to be required to comply with Title II of the ADA. An agency just has to be a state or local government entity.

Anoka County must ensure that people with disabilities are able to use their programs and services. Disability laws set out an equal access standard for providing services. This means that individuals with disabilities are entitled to equal access to human services programs; the same standard of access that applies to people without disabilities.

A public agency must reasonably modify its policies, procedures and practices to avoid discrimination. A public agency must also take appropriate steps to ensure that its communications with individuals with disabilities are as effective as communications with others.

##### **B. Anoka County and all its services, programs and benefits, are accessible to and usable by people with disabilities, including people with hearing loss, low vision and other sensory disabilities. To avoid disability discrimination, Anoka County will:**

- Notify the public about rights and protections for people with disabilities under the Americans with Disabilities Act.
- Designate an ADA Contact and maintain a complaint procedure.
- Make sure that, to the extent reasonably possible, its buildings are physically accessible for people with disabilities.
  - Physical access includes:
    - Convenient off-street parking designated specifically for people with disabilities.
    - Curb cuts and ramps between parking areas and the Anoka County buildings.
    - Level access into the first floor of all Anoka County buildings with elevator access to all other floors.
- Assist individuals with disabilities to apply and qualify for benefits based on their eligibility.

- Provide appropriate auxiliary aids and services, including accessible formats, to ensure effective communication with people with disabilities.
  - Anoka County will provide appropriate auxiliary aids and services which include:
    - accessible formats
    - qualified readers, writers and interpreters who convey information effectively, accurately and impartially using any necessary specialized vocabulary.
  - To determine what types of auxiliary aids or services are necessary, Anoka County will give primary consideration to the requests of people with disabilities. Anoka County will honor the choice of the person requesting the auxiliary aid or service unless it would fundamentally alter the nature of the service, program or benefit or cause an undue administrative or financial burden. If this happens, Anoka County will find another equally effective auxiliary aid or service.
- Provide services, programs and benefits that are accessible to and usable by qualified people with disabilities.
- Make reasonable modifications to its policies, procedures or practices when necessary to avoid discrimination on the basis of disability, unless Anoka County can demonstrate that making the modifications would fundamentally alter the nature of the services, programs or benefits.

#### C. ADA Coordinator

Anoka County has designated an ADA Coordinator to serve as its point person on disability matters raised by applicants, clients and members of the public. Questions, concerns, comments or requests for accommodation should be made to the ADA Coordinator:

Dee Guthman  
Deputy County Administrator  
Anoka County Government Center  
2100 Third Avenue  
Anoka, MN 55303  
Voice: 763-324-4707  
Or use your preferred relay service  
[Dee.Guthman@co.anoka.mn.us](mailto:Dee.Guthman@co.anoka.mn.us)

#### 5. Anoka County's Complaint Procedure

Every individual has the right to equal access to services, whether they are an applicant, client or member of the public. Anoka County has implemented this civil rights complaint procedure to provide prompt and thorough resolution of civil rights complaints.

Civil rights complaints allege discrimination. Individuals have a right to file a civil rights complaint if they believe they or an individual they care for has been

discriminated against because of their race, color, creed, religion, national origin, sex, marital status, disability, status with regard to public assistance, sexual orientation, and age.

It is against the law for anyone who works for Anoka County to retaliate against a person who files a complaint or who cooperates in the investigation of a civil rights complaint.

If the Complainant believes that the complainant has been discriminated against by someone working for Anoka County, then a civil rights complaint form will be provided. Use the contact information below to file your complaint. You may also contact the Title VI and Civil Rights Coordinator's office at Anoka County with additional questions.

Dee Guthman, Deputy County Administrator  
Anoka County Government Center  
2100 Third Avenue  
Anoka, MN 55303  
Voice: 763-324-4707  
FAX: 763-324-5490  
Or use your preferred relay service  
[Dee.Guthman@co.anoka.mn.us](mailto:Dee.Guthman@co.anoka.mn.us)

## 6. Complaint Notification Procedure:

- A. Civil rights complaints **must** be submitted to the Title VI and Civil Rights Coordinator within 180 days of the date the alleged discrimination occurred.
- B. A complaint **must** be in writing and contain the name and address of the person filing it.
  - a. Use Attachment A in the Appendix – Complaint Form
  - b. Provide a telephone number or relay service number if deaf or hard of hearing.
  - c. Provide an email address if it helps get in touch with the complainant.
  - d. The complaint **must** state the problem or action alleged and the relief desired. If you need assistance with your complaint, the Civil Rights Contact will help you.
- C. Anoka County **must** conduct an investigation of the complaint. The Title VI and Civil Rights Coordinator will conduct the investigation. The investigation may be informal, but it **must** be thorough and timely. People who have an interest in the complaint **must** have an opportunity to submit relevant information about the complaint. The investigation shall include interviews with individuals involved in the complaint and review of all relevant documents. If more information is needed to clarify or resolve the claim, the County will contact the complainant in writing at the address provided on the complaint form. Anoka County will make

every effort to issue a written decision on the complaint within 120 days after its filing and shall notify the complainant of its decision. A case can also be administratively closed if the complainant no longer wishes to pursue their claim.

If the Complainant does not agree with the decision following the investigation, the Complainant is entitled to an appeal as addressed below. Anoka County will maintain the complaint records and files for three years from the date of the decision. If the complaint involves a Human Services Program see the Anoka County Comprehension Civil Rights Plan.

- D. The Complainant may appeal the Agency's decision by writing to the agency's Title VI and Civil Rights Coordinator within 15 days of receiving the written decision. The County Board will designate a neutral hearing officer to conduct the appeal. The assigned hearing officer will issue a written decision in response to the appeal, no later than 30 days after the filing. The County's administrative complaint procedures contained in this Plan do not deny the rights of the Complainant to file formal complaints with other State or Federal agencies, or to seek private counsel for complaints alleging discrimination.
- E. The Complainant must be informed that they can file a discrimination complaint **directly** with the Federal agency that provides federal financial assistance to the County for the program or service for which the Complainant was working with. The Title VI and Civil Rights Coordinator will provide that information to the Complainant. If that information is not provided, the Complainant may file their complaint with the

U.S. Department of Justice  
Civil Rights Division  
950 Pennsylvania Ave. NW  
Washington, D.C. 20530

F. Filing Complaints with State Agencies:

The person filing the complaint **must** also be informed that he/she can file a discrimination complaint **directly** with the Minnesota Department of Human Rights.

- (a) The Minnesota Department of Human Rights prohibits discrimination in public services programs because of race, color, creed, religion, national origin, disability, sex, sexual orientation, or public assistance status. Contact the Minnesota Department of Human Rights directly:

Minnesota Department of Human Rights  
Freeman Building, 625 North Robert Street  
St. Paul, MN 55155  
651-539-1100 (voice)  
800-657-3704 (toll free)

711 or 800-627-3529 (MN Relay)

G. Arrangements for People with Disabilities:

- a. Anoka County **will** make appropriate arrangements to ensure that people with disabilities are provided reasonable modifications or effective communications, if needed, to participate in the complaint process. The Title VI and Civil Rights Coordinator or designee is responsible for making these arrangements.

Complainants filing disability complaints will use Anoka County's Title VI and Civil Rights complaint procedure as outlined above. Complainants should contact the County's ADA Contact person identified in section 2 above. The complainant may also directly file a complaint with the ADA:

U.S. Department of Justice  
Civil Rights Division  
950 Pennsylvania Avenue, NW  
4CON, 9th Floor  
Washington, DC 20530 FAX: 202-307-1197

Or online at [www.civilrights.justice.gov/report](http://www.civilrights.justice.gov/report)

## 7. Limited English Proficiency Plan

Anoka County's various departments have created tailored plans to ensure compliance with the Limited English Proficiency (LEP) requirements as set forth by Executive Order 13166. The Department plans incorporate local assessment that considers factors, including but not limited to: (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the County; (2) The frequency with which LEP persons come into contact with County services; (3) The nature and importance of the county's services in people's lives; and (4) The resources available for the County departments to conduct LEP outreach, as well as costs associated with such outreach. The responsive plans are available by contacting the relevant department.

## 8. Title VI and Civil Rights Assurance of Compliance

The Anoka County Administrator and Chair of the County Board have signed the *2021 Civil Rights Assurance of Compliance*. A copy is located in the Appendix; **Attachment B**.

## **9. Title VI and Civil Rights Plan Administration**

Anoka County will:

- Post a copy of its Title VI and Civil Rights Plan at the reception desk on the first floor of the Anoka County Government Center where members of the public can review it.
- Post the Title VI and Civil Rights Plan on the County's public website at [www.anokacounty.us](http://www.anokacounty.us)
- Review the Title VI and Civil Rights Plan with appropriate staff at regular intervals, in compliance with federal guidance and regulations.

**Attachment A –Anoka County Title VI and Civil Rights Complaint Form**  
**FILE WITH Title VI & Civil Rights Coordinator**  
**Client Information:**

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
Telephone number(s): \_\_\_\_\_  
Name, Address and Telephone number of someone who will know how to reach you (optional)  
\_\_\_\_\_

**Agency Information**

Agency: \_\_\_\_\_  
Person in Agency (if known): \_\_\_\_\_  
Agency Address: \_\_\_\_\_  
Agency Telephone: \_\_\_\_\_

**Information about Discrimination Complaint (check as many as apply):**

Race  Color  National Origin  Sex  Creed  Religion  
 Age  Disability  Public Assistance Status  Sexual Orientation  Political Beliefs  
If you filed this complaint with any other agency, please give the name, address and telephone number of the agency and the name of the investigator assigned to the case: \_\_\_\_\_  
\_\_\_\_\_

**Details of Discrimination Claim:**

Explain what happened to you and please include the following points:  
1) Explain why you believe you were treated differently; 2) Explain how you were treated differently from other people;  
3) Give the date(s) of the incident(s) 4) Give the name(s) of the people who were directly involved; 5) If there were any witnesses, give their names(s) and explain what they saw or heard.  
  
If you need more space, attach additional pages:

Signature \_\_\_\_\_ Date \_\_\_\_\_

**This information is available in accessible formats for individuals with disabilities by calling 763-324-4700 or by using your preferred relay service. For other information on disability rights and protections, contact the agency's ADA Coordinator.**

**SUBMIT COMPLETED FORM TO:**  
Contact: Civil Rights Coordinator  
763-324-4707 (voice)  
763-324-5490 (fax)  
Use preferred relay service

For translation of this document, contact the Title VI & Civil Rights Coordinator.

**Attachment B**

**TITLE VI & CIVIL RIGHTS ASSURANCE OF COMPLIANCE  
NONDISCRIMINATION IN STATE AND COUNTY PROGRAMS**

---

Anoka County, (HEREAFTER CALLED THE "COUNTY")

THE COUNTY provides this Title VI & Civil Rights Assurance of Compliance (hereafter called the "Assurance") in consideration of and for the purpose of obtaining any and all federal financial assistance from the United States Government. The County agrees that compliance with this Assurance is a condition of continued receipt of federal financial assistance and that it is binding upon the County directly or through contract, license, or other provider of services, as long as it receives federal or state financial assistance; and shall be submitted upon request to the designated Agency.

THE COUNTY ASSURES that it will comply with:

Title VI of the Civil Rights Act of 1964, as amended; Age Discrimination Act of 1975, 42 U.S.C. 6101, as amended; Section 504 of the Rehabilitation Act of 1973, as amended; Section 508 of the Rehabilitation Act of 1973, as amended; Title II of the Americans with Disabilities Act of 1990 and all accompanying federal laws, regulations and directives.

PURSUANT TO THE TITLE VI & CIVIL RIGHTS PLAN, by accepting this Assurance, the County agrees to allow access, by authorized personnel, during normal working hours, to private and/or confidential data maintained by the County (or other sub-recipient of federal financial assistance) to the extent necessary to conduct a full and complete investigation into any complaint of discrimination, including to compile data, maintain records and submit reports as required to determine compliance with the above mentioned laws, rules and regulations. No private and/or confidential data collected, maintained or used in the course of an investigation shall be disseminated except as authorized by statute, either during the period of the investigation or after it has been concluded.

August 2021

THE PERSON WHOSE SIGNATURE APPEARS BELOW is authorized to sign this Assurance and commit the County to its terms.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Scott Schulte, Chair  
Anoka County Board of Commissioners

\_\_\_\_\_  
Date

\_\_\_\_\_  
Rhonda Sivarajah  
Anoka County Administrator

I CERTIFY that the signatory for the County has lawful authority to bind the County to the terms of this Title VI Assurance.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Assistant Anoka County Attorney