

CIVIL RIGHTS COMPLIANCE LETTER OF ASSURANCE

Children and Families
DCF-F-154-E

Health Services
F-00165 (12/2021)

Civil Rights Compliance Period: January 1, 2022 to December 31, 2025:

Outagamie County (hereinafter "Recipient") agrees that compliance with this assurance constitutes a condition of receiving Federal financial assistance through the Department of Health Services and the Department of Children and Families (the "State Agencies"). This assurance is binding upon Recipient, its successors, transferees, and assignees throughout the Compliance Period, or as long as Federal financial assistance is extended to Recipient, whichever is shorter. The State Agency from which the Federal funds will be paid may enforce this Assurance as a condition of receiving such funds.

Recipient agrees to comply with civil rights monitoring reviews, including providing access to records and requested files related to membership, enrollment and services in the program or activity maintained by the Recipient and, to the extent within its authority, arranging for interviews with staff, clients and applicants for services, subrecipients, and referral agencies. Recipient agrees to cooperate with the State Agency or State Agencies in developing, implementing, and monitoring corrective action plans that result from substantiated civil rights deficiencies.

By signing on behalf of Recipient, I state that I am authorized to bind Recipient to the terms of this Assurance and to commit the Recipient to the above provisions.



SIGNATURE – Authorized Representative

Date: 12/20/21

Printed name: Natalie Oostenbrug

Title: Diversity, Equity, and Inclusion Officer

Instructions for completing Letter of Assurance

- Complete this signature page
- Include Appendices A-1, A-2 and A-3 with the signature page
- Updates to appendices should be submitted if there are staff or funding changes

**RECIPIENT HEREBY AGREES THAT IT WILL COMPLY WITH ALL APPLICABLE
FEDERAL CIVIL RIGHTS LAWS:**

Federal civil rights laws prohibit discrimination of members, applicants, enrollees, and beneficiaries in any programs or activities that receive Federal financial assistance. Those laws include, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, Title IX of the Educational Amendments of 1972, the Age Discrimination Act of 1975, Section 1557 of the Patient Protection and Affordable Care Act of 2010, and their respective implementing regulations, and prohibit recipients and subrecipients of Federal financial assistance from discriminating on the basis of race, color, national origin, sex, age, disability, and, in some programs, religious creed or political affiliation or beliefs, in their programs or activities, and in retaliating or engaging in reprisals against individuals for opposing discrimination protected under these laws. In addition to those Federal civil rights laws, other laws may apply to recipients of specific Federal programs, and the Recipient must comply with all applicable Federal civil rights laws. Civil rights laws may be created or amended during the time of the Compliance Period. Recipient agrees to comply with the current laws throughout the Compliance Period.

In pursuit of compliance with those laws, the Recipient shall, but not exclusively, do the following:

1. Provide training to all staff on civil rights requirements and methods of providing meaningful access to individuals with limited English proficiency (LEP) and effective communication and equal access to individuals with disabilities.
2. Provide language assistance services, including translated documents and oral interpretation, free of charge and in a timely manner, when such services are necessary to provide meaningful access to LEP individuals.
3. Communicate effectively with people who have vision, hearing, or speech disabilities and provide auxiliary aids and services when needed to individuals with communications disabilities at no cost to the person with a disability.
4. Make all programs and activities provided through electronic and information technology accessible to individuals with disabilities and ensure nondiscrimination in providing services and benefits.
5. Ensure that any newly constructed and altered facilities are physically accessible to individuals with disabilities.
6. Have in place a discrimination complaint process and provide notices of its complaint process, translated into the major primary language groups of the LEP individuals in its service area.
7. Post required nondiscrimination statements and notices.
8. Provide accessible programs, facilities, and reasonable accommodations to service participants/customers with disabilities.
9. Provide translation of vital documents for each eligible LEP language group that constitutes at least 5 percent or 1,000 individuals, whichever is less, of the population eligible to be served or likely to be encountered in the recipient's service area.

CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

Local Agency/Recipient Name:	Outagamie County Health and Human Services
Funding Agency:	<input type="checkbox"/> Wisconsin Department of Children and Families (DCF) <input checked="" type="checkbox"/> Wisconsin Department of Health Services (DHS)
Program or Activity:	Bioterrorism Planning; Overdose Fatality Review; Preventive Health and Health Services Block Grant; Childhood Lead; Immunization; Maternal Child Health
Geographic Service Area:	Outagamie County
Income Level(s) Analyzed:	Select the income level you will use for the Potentially Eligible Population. Note: If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts. <input checked="" type="checkbox"/> All income levels <input type="checkbox"/> Income below poverty level

Category ¹	Potentially Eligible Population (from data.census.gov)		Population Served in Most Recent Calendar or Program Year (Specify Year: 2021)		Percentage-Point Difference (= % Served - % Potentially Eligible)
	Number Potentially Eligible	Percentage of Total Potentially Eligible Population ²	Number Served	Percentage of Total Served Population ³	
Total Population	190705	100.00%	1394	100.00%	0.00
Breakdown by Race					
White	161879	84.88%	928	66.57%	-18.31
Black or African American	2929	1.53%	74	5.3%	3.77
American Indian or Alaska Native	2743	1.44%	11	.78%	.66
Asian	6588	3.45%	42	3.01%	.44
Native Hawaiian or Pacific Islander	112	.06%	2	.14%	.08
Other	415	.22%	0	0%	.22
More Than One Race	6616	3.47%	3	.22%	-3.25
Subtotal, Non-White	19403	10.17%	132	9.47%	-.70
Hispanic/Latino (Regardless of Race)	9423	4.94%	33	2.37%	-2.57
Breakdown by Sex					
Female	95752	50.21%	793	56.89%	6.68
Male	94953	49.79%	600	43.04%	-6.75

¹ Categories were determined by the U.S. Census (data.census.gov).

² Percentage of Total Potentially Eligible Population = (Number Potentially Eligible in the Category / Number Potentially Eligible in the Total Population) X 100%

³ Percentage of Total Served Population = (Number Served in the Category / Number Served in the Total Population) X 100%

Disabilities	18562	9.73%	1394	100%	90.27
Data Source(s) for Potentially Eligible Population:	US Data Census; P2, S1810				
Data Source(s) for Population Served:	TCM				

Customer Service Population Data Analysis

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **greater than 2.00** (for example, 3.00% or 4.00%):
These categories may be over-represented in the program's customer population.⁴

Black or African American, Disabilities, Female

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **less than -2.00** (for example, -3.00% or -4.00%):
These populations may be under-represented in the program's customer population.

White, More Than One Race, Hispanic/Latino, Male

What factors may be contributing to any under-/over-representation?⁵

334 clients declined to specify a race and 1 client was an unknown gender. The Clinical Manager does not accurately report those served in the division who may have disabilities. Outagamie County will work on securing accurate reporting for these clients served.

Do you believe these results indicate potentially eligible participants are or are not being served?

The Public Health Division continues to serve all clients requesting services. A large portion of work with consumers in the last year involved work with the Covid Pandemic. The Public Health team worked with cases, agencies, schools, the public on educating and working on vaccination clinics to list a few tasks of focus for the team. The Public Health program services clients regardless of their race, gender or disability.

What actions are being taken or can be taken to improve program participation and encourage enrollment of populations that are under-served? (Note: Depending on the applicable federal programs, recipients may be required to take reasonable steps to conduct outreach to under-represented communities. Recipients may contact the appropriate state agency for additional information on outreach.)

The Public Health division will continue to do outreach in the community to make individuals aware of services that they may be eligible for within Outagamie County. Staff will also be reminded to make sure they are entering all data fields accurately into the database system.

It may be that denials of service (including negative decisions, licensing activities, etc.) contribute toward lower-than-expected participation of a particular category. Explain whether such denials have been disproportionate for any specific protected groups within the one calendar or program year you looked at to complete the CSPA table:

N/A

⁴ Over-representation may reflect the recipient is meeting the needs of that category, outreach efforts to that category are successful, or other factors that make that category more likely to be served. Over-representation of one category is not necessarily a sign that the program is not serving all of the categories of population equally, but it does mean one or more of the other categories may be under-represented.

⁵ Although error in the data may explain some (or all) of the difference, especially for smaller populations, be sure to evaluate all possible factors before attributing differences to error in the data.

LIMITED ENGLISH PROFICIENCY (LEP) CUSTOMER DATA ANALYSIS CHART

Local Agency/Recipient Name:	Outagamie County Health and Human Services				
Funding Agency:	<input type="checkbox"/> Wisconsin Department of Children and Families (DCF) <input checked="" type="checkbox"/> Wisconsin Department of Health Services (DHS)				
Program or Activity:	Bioregion Planning; Overdose Fatality Review; Preventive Health and Health Services Block Grant; Childhood Lead; Immunization; Maternal Child Health				
Geographic Service Area:	Outagamie County				
Income Level(s) Analyzed:	Select the income level you will use for the Potentially Eligible Population. Note: If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts. <input checked="" type="checkbox"/> All income levels <input type="checkbox"/> Income below poverty level				
(a) Total Potentially Eligible Population (from data.census.gov) 2019	LEP Potentially Eligible Population (from data.census.gov)		(d) Number LEP Served in Most Recent Calendar or Program Year (Specify Year: 2021)	Safe Harbor	
	(b) Number LEP Potentially Eligible in This Language Group	(c) Percentage LEP Potentially Eligible in This Language Group ²		Written Translation of Vital Documents	Written Notice to LEP Groups of Their Right to Receive Competent Oral Language Interpretation & Translation of Vital Documents
Spanish	4695	2.70%	2	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> yes
Hmong/Laoian ³	3425	1.97%	0	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> yes
Chinese	375	.22%	2	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Korean	51	.03%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Vietnamese	297	.17%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Tagalog	179	.10%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
German/Germanic ⁴	767	.44%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Russian/Polish/Other Slavic ⁵	233	.13%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
French/Patois/Haitian/Creole/Cajun	192	.11%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Arabic	23	.01%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes

¹ Language groups were determined by the [U.S. Census and Estimates of at Least the Top 15 Languages Spoken by Individuals with Limited English Proficiency](#).

² Percentage LEP Potentially Eligible = ((b)/(a)) X 100%

³ "Hmong/Laoian" includes Hmong, Laoian, and other languages from mainland Asia and the Pacific Islands not mentioned elsewhere in this table.

⁴ "German/Germanic" includes Pennsylvania Dutch.

⁵ "Russian/Polish/Other Slavic" includes Bosnian, Croatian, and Serbian.

Other – Specify: Chukese; Kinyarwanda;	419	.24%	2	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Data Source(s) for LEP Potentially Eligible Population:	US Data Census- 2019 Languages Spoken at Home C16001				

Data Source(s) for Number LEP Served:	The Clinical Manager
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Services to LEP Language Groups

Please check all that apply to recipient's service to the eligible language groups in your service area:

- ☒ Oral interpretation is provided upon request at no charge to an LEP customer.
- ☒ We hire bilingual staff with demonstrated proficiency in English and a second language, who are knowledgeable of specialized terms and concepts in English and the language they interpret, and who have received training on skills and ethics of interpretation. (Training can be provided in-house or by an external agency. Documentation of language ability, training on specialized terms and concepts, and training on skills and ethics of interpretation should be maintained.)
- ☒ We routinely collect information regarding the LEP participant's preferred primary language. The language information for each client is part of our database.
- ☒ We have identified and inventoried all vital documents for our programs or services, and the inventory list is available for inspection.
- ☒ We routinely maintain a record of the number of language interpretation services that we offer and that we provide to LEP customers, on what date, how interpretation was provided (e.g., in person or by telephone), and in what language.
- ☒ The eligible LEP population that is likely to be encountered in our service area constitutes 5% or 1,000 persons; therefore, we provide written translation of vital documents.
- ☒ Where there are fewer than 50 people in the language group that reaches the 5% trigger, we provide written notice to those LEP groups in their primary language of their right to receive oral language interpretation and written vital materials, free of cost.
- ☒ For all documents, vital or otherwise, we provide meaningful access to LEP individuals in all language groups. Meaningful access may be providing translation of the information orally.

LEP Customer Data Analysis

Using the LEP data chart and any other sources of data, list the LEP population(s) represented in the program's geographic service area.

Chukese; Kinyarwanda

Do you believe the data indicate potentially eligible LEP participants are or are not being served?

Public Health serves all clients seeking services regardless of race, gender or language. Public Health also serves the WIC unit which is broken down in another LEP and Customer Analysis using the Rosie Database with for not clients not to be duplicated.

What factors may be contributing to potentially eligible LEP participants not being served?

All clients are served in the Public Health Division that are in needs of services regardless of language, race, sex or disability that are eligible for services We will continue to work with staff on training when entering demographics and interviewing clients for data including disabilities, race, language and sex.

What actions are being taken or can be taken to improve program participation and encourage enrollment of LEP populations that are under-served?

⁶ Although error in the data may explain some (or all) of the difference, especially for smaller populations, be sure to evaluate all possible factors before attributing differences to error in the data.

The Public Health Division will continue to do outreach in the community to make individuals aware of services that they may be eligible for within Outagamie County. Staff will also be reminded to make sure they are entering all data fields accurately into the TCM database system.

Please discuss the nature of LEP-related discrimination complaints filed with the agency, both formal and informal, and resolution of LEP complaints over the last calendar year.

N/A

CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

Local Agency/Recipient Name:	Outagamie County Health and Human Services
Funding Agency:	<input checked="" type="checkbox"/> Wisconsin Department of Children and Families (DCF) <input checked="" type="checkbox"/> Wisconsin Department of Health Services (DHS)
Program or Activity:	Youth Aids and Youth Justice Grants; Anti Human Trafficking; Community Intervention Program
Geographic Service Area:	Outagamie County
Income Level(s) Analyzed:	Select the income level you will use for the Potentially Eligible Population. Note: If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts. <input checked="" type="checkbox"/> All income levels <input type="checkbox"/> Income below poverty level

	Potentially Eligible Population (from data.census.gov)		Population Served in Most Recent Calendar or Program Year (Specify Year: 2021)		
Category ¹	Number Potentially Eligible	Percentage of Total Potentially Eligible Population ²	Number Served	Percentage of Total Served Population ³	Percentage-Point Difference (= % Served - % Potentially Eligible)
Total Population	190705	100.00%	1260	100.00%	0.00
Breakdown by Race					
White	161879	84.88%	820	65.08%	-19.8
Black or African American	2929	1.53%	172	13.65%	12.12
American Indian or Alaska Native	2743	1.44%	77	6.11%	4.67
Asian	6588	3.45%	33	2.62%	-.78
Native Hawaiian or Pacific Islander	112	.06%	2	.16%	.10
Other	415	.22%	0	0%	.22
More Than One Race	6616	3.47%	30	2.38%	-1.09
Subtotal, Non-White	19403	10.17%	314	24.92%	14.75
Hispanic/Latino (Regardless of Race)	9423	4.94%	32	2.54%	-2.4
Breakdown by Sex					
Female	95752	50.21%	439	34.84%	-15.37
Male	94953	49.79%	816	64.76%	14.97

¹ Categories were determined by the U.S. Census (data.census.gov).

² Percentage of Total Potentially Eligible Population = (Number Potentially Eligible in the Category / Number Potentially Eligible in the Total Population) X 100%

³ Percentage of Total Served Population = (Number Served in the Category / Number Served in the Total Population) X 100%

Disabilities	18562	9.73%	0	0%	-9.73
Data Source(s) for Potentially Eligible Population:	US Data Census; P2, S1810				
Data Source(s) for Population Served:	TCM				

Customer Service Population Data Analysis

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **greater than 2.00** (for example, 3.00% or 4.00%):
These categories may be over-represented in the program's customer population.⁴

Black or African American, American Indian or AlaskaNative; Male

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **less than -2.00** (for example, -3.00% or -4.00%):
These populations may be under-represented in the program's customer population.

White, Disabilities, Female

What factors may be contributing to any under-/over-representation?⁵

124 clients declined to specify a race and 5 clients were an unknown gender and 2 clients refused to answer their race. The Clinical Manager does not accurately report those served in the division who may have disabilities. Outagamie County will work on securing accurate reporting for these clients served.

Do you believe these results indicate potentially eligible participants are or are not being served?

The Youth and Families Division continues to serve all clients requesting servicers. The Youth and Families Division program services clients regardless of their race, gender or disability.

What actions are being taken or can be taken to improve program participation and encourage enrollment of populations that are under-served? (Note: Depending on the applicable federal programs, recipients may be required to take reasonable steps to conduct outreach to under-represented communities. Recipients may contact the appropriate state agency for additional information on outreach.)

The Youth and Families Division will continue to do outreach in the community to make individuals aware of services that they may be eligible for within Outagamie County when applicable. Staff will also be reminded to make sure they are entering all data fields accurately into the database system.

It may be that denials of service (including negative decisions, licensing activities, etc.) contribute toward lower-than-expected participation of a particular category. Explain whether such denials have been disproportionate for any specific protected groups within the one calendar or program year you looked at to complete the CSPA table:

N/A

⁴ Over-representation may reflect the recipient is meeting the needs of that category, outreach efforts to that category are successful, or other factors that make that category more likely to be served. Over-representation of one category is not necessarily a sign that the program is not serving all of the categories of population equally, but it does mean one or more of the other categories may be under-represented.

⁵ Although error in the data may explain some (or all) of the difference, especially for smaller populations, be sure to evaluate all possible factors before attributing differences to error in the data.

LIMITED ENGLISH PROFICIENCY (LEP) CUSTOMER DATA ANALYSIS CHART

Local Agency/Recipient Name:	Outagamie County Health and Human Services
Funding Agency:	<input type="checkbox"/> Wisconsin Department of Children and Families (DCF) <input checked="" type="checkbox"/> Wisconsin Department of Health Services (DHS)
Program or Activity:	Youth Aids and Youth Justice Grants; Anti Human Trafficking; Community Intervention Program
Geographic Service Area:	Outagamie County
Income Level(s) Analyzed:	Select the income level you will use for the Potentially Eligible Population. Note: If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts. <input checked="" type="checkbox"/> All income levels <input type="checkbox"/> Income below poverty level

(a) Total Potentially Eligible Population (from data.census.gov) 2019	LEP Potentially Eligible Population (from data.census.gov)		(d) Number LEP Served in Most Recent Calendar or Program Year (Specify Year: 2021)	Safe Harbor	
	(b) Number LEP Potentially Eligible in This Language Group	(c) Percentage LEP Potentially Eligible in This Language Group ²		Written Translation of Vital Documents	Written Notice to LEP Groups of Their Right to Receive Competent Oral Language Interpretation & Translation of Vital Documents
Language Groups ¹					
Spanish	604	2.70%	1	<input checked="" type="checkbox"/> yes <input checked="" type="checkbox"/> no	<input type="checkbox"/> yes
Hmong/Laoian ³	441	1.97%	0	<input checked="" type="checkbox"/> yes <input checked="" type="checkbox"/> no	<input type="checkbox"/> yes
Chinese	48	.22%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Korean	7	.03%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Vietnamese	38	.17%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Tagalog	23	.10%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
German/Germanic ⁴	99	.44%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Russian/Polish/Other Slavic ⁵	30	.13%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
French/Patois/Haitian/Creole/Cajun	25	.11%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Arabic	3	.01%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes

¹ Language groups were determined by the U.S. Census and [Estimates of at Least the Top 15 Languages Spoken by Individuals with Limited English Proficiency](#).

² Percentage LEP Potentially Eligible = [(b)/(a)] X 100%

³ "Hmong/Laoian" includes Hmong, Laoian, and other languages from mainland Asia and the Pacific Islands not mentioned elsewhere in this table.

⁴ "German/Germanic" includes Pennsylvania Dutch.

⁵ "Russian/Polish/Other Slavic" includes Bosnian, Croatian, and Serbian.

Other – Specify: undetermined	54	.24%	8	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Data Source(s) for LEP Population:	US Data Census- 2019 Languages Spoken at Home C16001; 2019 Age and Sex- S0101 using the data for ages 10 to 14 and 15-19 years old. Please note due to charts not being available for the specific age group the YFS division serves (ages 10-17), the data was extracted using the age group available with the census charts. The youth in this group make up for approximately 12.87% of the overall county population. This percentage was applied to the overall language in the county to determine the approximate number of individuals with the languages identified.				

Data Source(s) for LEP Served:	The Clinical Manager
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Services to LEP Language Groups

Please check all that apply to recipient's service to the eligible language groups in your service area:

- ☒ Oral interpretation is provided upon request at no charge to an LEP customer.
- ☒ We hire bilingual staff with demonstrated proficiency in English and a second language, who are knowledgeable of specialized terms and concepts in English and the language they interpret, and who have received training on skills and ethics of interpretation. (Training can be provided in-house or by an external agency. Documentation of language ability, training on specialized terms and concepts, and training on skills and ethics of interpretation should be maintained.)
- ☒ We routinely collect information regarding the LEP participant's preferred primary language. The language information for each client is part of our database.
- ☒ We have identified and inventoried all vital documents for our programs or services, and the inventory list is available for inspection.
- ☒ We routinely maintain a record of the number of language interpretation services that we offer and that we provide to LEP customers, on what date, how interpretation was provided (e.g., in person or by telephone), and in what language.
- ☒ The eligible LEP population that is likely to be encountered in our service area constitutes 5% or 1,000 persons; therefore, we provide written translation of vital documents.
- ☒ Where there are fewer than 50 people in the language group that reaches the 5% trigger, we provide written notice to those LEP groups in their primary language of their right to receive oral language interpretation and written vital materials, free of cost.
- ☒ For all documents, vital or otherwise, we provide meaningful access to LEP individuals in all language groups. Meaningful access may be providing translation of the information orally.

LEP Customer Data Analysis

Using the LEP data chart and any other sources of data, list the LEP population(s) represented in the program's geographic service area.

undetermined

Do you believe the data indicate potentially eligible LEP participants are or are not being served?

Youth and Family Services serves all clients seeking services regardless of race, gender or language if services are needed based on state statute.

What factors may be contributing to potentially eligible LEP participants not being served?⁶

All clients are served in the Youth and Families Division that are in needs of services regardless of language, race, sex or disability that are eligible for services. We will continue to work with staff on training when entering demographics and interviewing clients for data including disabilities, race, language and sex.

What actions are being taken or can be taken to improve program participation and encourage enrollment of LEP populations that are under-served?

The Youth and Families Division will continue to do outreach in the community to make individuals aware of services that they may be eligible for within Outagamie

⁶ Although error in the data may explain some (or all) of the difference, especially for smaller populations, be sure to evaluate all possible factors before attributing differences to error in the data.

County. Staff will also be reminded to make sure they are entering all data fields accurately into the TCM database system.

Please discuss the **nature** of LEP-related discrimination complaints filed with the agency, both formal and informal, and resolution of LEP complaints over the last calendar year:

N/A

CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

Local Agency/Recipient Name:	Outagamie County Health and Human Services
Funding Agency:	<input type="checkbox"/> Wisconsin Department of Children and Families (DCF) <input checked="" type="checkbox"/> Wisconsin Department of Health Services (DHS)
Program or Activity:	Women Infants and Children (WIC); WIC Farmer's Market Nutrition Program; WIC Peer Counseling
Geographic Service Area:	Outagamie County
Income Level(s) Analyzed:	Select the income level you will use for the Potentially Eligible Population. Note: If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts. <input type="checkbox"/> All income levels <input checked="" type="checkbox"/> Income below poverty level

	Potentially Eligible Population (from data.census.gov)		Population Served in Most Recent Calendar or Program Year (Specify Year: 2021)		
Category¹	Number Potentially Eligible	Percentage of Total Potentially Eligible Population²	Number Served	Percentage of Total Served Population³	Percentage-Point Difference (= % Served - % Potentially Eligible)
Total Population	35967	100.00%	3306	100.00%	0.00
Breakdown by Race					
White	30529	84.88%	2158	65.27%	-19.61
Black or African American	550	1.53%	273	8.26%	6.73
American Indian or Alaska Native	518	1.44%	40	1.21%	-.23
Asian	1241	3.45%	455	13.76%	10.31
Native Hawaiian or Pacific Islander	216	.06%	98	2.96%	3.04
Other	79	.22%	0	0%	-.22
More Than One Race	1248	3.47%	282	8.53%	5.06
Subtotal, Non-White	3658	10.17%	1148	34.72%	24.55
Hispanic/Latino (Regardless of Race)	1777	4.94%	683	20.66%	15.72
Breakdown by Sex					
Female	15329	50.21%	2065	62.46%	12.25
Male	15200	49.79%	1240	37.51%	-12.28

¹ Categories were determined by the U.S. Census (data.census.gov).

² Percentage of Total Potentially Eligible Population = (Number Potentially Eligible in the Category / Number Potentially Eligible in the Total Population) X 100%

³ Percentage of Total Served Population = (Number Served in the Category / Number Served in the Total Population) X 100%

Disabilities	2970	9.73%	3	100%	90.27
Data Source(s) for Potentially Eligible Population:	US Data Census; P2, S1810;S1701 using 185% of poverty levels				
Data Source(s) for Population Served:	Rosie Database				

Customer Service Population Data Analysis

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **greater than 2.00** (for example, 3.00% or 4.00%):
*These categories may be over-represented in the program's customer population.*⁴

Asian; Disabilities; Female; Hispanic/Latino; More Than One Race, Hispanic/Latino, Male; Native Hawaiian or Island Pacific

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **less than -2.00** (for example, -3.00% or -4.00%):
These populations may be under-represented in the program's customer population.

Male

What factors may be contributing to any under-/over-representation?⁵

The Rosie Database reports some duplicates. Of the children served with these programs, the gender participation data for infants and children; 48.9% were female and 51.1% were male. The US data census includes the 185% positive level but does exclude adult males from this table. WIC serves women and children. This data provided by Outagamie County for the entire population eligible is for all individuals both male and female in Outagamie county at the poverty level. The Rosie System does not track other for race.

Do you believe these results indicate potentially eligible participants are or are not being served?

The USD The Public Health Division, WIC unit continues to serve all clients requesting servicers. The WIC program services clients regardless of their race, gender or disability if they are eligible for services. WIC income eligibility is based on 185% of U.S. Department of Health and Human Services poverty guidelines.

What actions are being taken or can be taken to improve program participation and encourage enrollment of populations that are under-served? (Note: Depending on the applicable federal programs, recipients may be required to take reasonable steps to conduct outreach to under-represented communities. Recipients may contact the appropriate state agency for additional information on outreach.)

The Public Health division will continue to do outreach in the community to make individuals aware of services that they may be eligible for within Outagamie County. Staff will also be reminded to make sure they are entering all data fields accurately into the database system.

It may be that denials of service (including negative decisions, licensing activities, etc.) contribute toward lower-than-expected participation of a particular category. Explain whether such denials have been disproportionate for any specific protected groups within the one calendar or program year you looked at to complete the CSPA table:

N/A

⁴ Over-representation may reflect the recipient is meeting the needs of that category, outreach efforts to that category are successful, or other factors that make that category more likely to be served. Over-representation of one category is not necessarily a sign that the program is not serving all of the categories of population equally, but it does mean one or more of the other categories may be under-represented.

⁵ Although error in the data may explain some (or all) of the difference, especially for smaller populations, be sure to evaluate all possible factors before attributing differences to error in the data.

LIMITED ENGLISH PROFICIENCY (LEP) CUSTOMER DATA ANALYSIS CHART

Local Agency/Recipient Name:	Outagamie County Health and Human Services		
Funding Agency:	<input type="checkbox"/> Wisconsin Department of Children and Families (DCF) <input checked="" type="checkbox"/> Wisconsin Department of Health Services (DHS)		
Program or Activity:	Women Infants and Children (WIC); WIC Farmer's Market Nutrition Program; WIC Peer Counseling		
Geographic Service Area:	Outagamie County		
Income Level(s) Analyzed:	Select the income level you will use for the Potentially Eligible Population. Note: If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts. <input type="checkbox"/> All income levels <input checked="" type="checkbox"/> Income below poverty level		

(a) Total Potentially Eligible Population (from data.census.gov) 2019	LEP Potentially Eligible Population (from data.census.gov)		(d) Number LEP Served in Most Recent Calendar or Program Year (Specify Year: 2021)	Safe Harbor	
	(b) Number LEP Potentially Eligible in This Language Group	(c) Percentage LEP Potentially Eligible in This Language Group ²		Written Translation of Vital Documents	Written Notice to LEP Groups of Their Right to Receive Competent Oral Language Interpretation & Translation of Vital Documents
Spanish	971	2.70%	83	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Hmong/Laoian ³	709	1.97%	36	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Chinese	79	.22%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Korean	11	.03%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Vietnamese	61	.17%	1	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Tagalog	36	.10%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
German/Germanic ⁴	158	.44%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Russian/Polish/Other Slavic ⁵	47	.13%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
French/Patois/Haitian/Creole/Cajun	40	.11%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Arabic	4	.01%	1	<input type="checkbox"/> yes	<input type="checkbox"/> yes

¹ Language groups were determined by the [U.S. Census and Estimates of at Least the Top 15 Languages Spoken by Individuals with Limited English Proficiency](#).

² Percentage LEP Potentially Eligible = ((b)/(a)) X 100%

³ "Hmong/Laoian" includes Hmong, Laoian, and other languages from mainland Asia and the Pacific Islands not mentioned elsewhere in this table.

⁴ "German/Germanic" includes Pennsylvania Dutch.

⁵ "Russian/Polish/Other Slavic" includes Bosnian, Croatian, and Serbian.

Other – Specify: Urdu, Swahili, Dari, Other (not listed in database)	86	.24%	35	<input type="checkbox"/> yes	<input type="checkbox"/> yes
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Data Source(s) for LEP Potentially Eligible Population:	US Data Census- 2019 Languages Spoken at Home C16001; 2019 Age and Sex- S0101. Eligible population for this group was 35,967 based on the Customer Service Population Analysis Chart				
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Data Source(s) for Number LEP Served:	The Rosie Database reports some duplicates. Of the children served with these programs, the gender participation data for infants and children; 48.9% were female and 51.1% were male.
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Services to LEP Language Groups

Please check all that apply to recipient's service to the eligible language groups in your service area:

- ☒ Oral interpretation is provided upon request at no charge to an LEP customer.
- ☒ We hire bilingual staff with demonstrated proficiency in English and a second language, who are knowledgeable of specialized terms and concepts in English and the language they interpret, and who have received training on skills and ethics of interpretation. (Training can be provided in-house or by an external agency. Documentation of language ability, training on specialized terms and concepts, and training on skills and ethics of interpretation should be maintained.)
- ☒ We routinely collect information regarding the LEP participant's preferred primary language. The language information for each client is part of our database.
- ☒ We have identified and inventoried all vital documents for our programs or services, and the inventory list is available for inspection.
- ☒ We routinely maintain a record of the number of language interpretation services that we offer and that we provide to LEP customers, on what date, how interpretation was provided (e.g., in person or by telephone), and in what language.
- ☒ The eligible LEP population that is likely to be encountered in our service area constitutes 5% or 1,000 persons; therefore, we provide written translation of vital documents.
- ☒ Where there are fewer than 50 people in the language group that reaches the 5% trigger, we provide written notice to those LEP groups in their primary language of their right to receive oral language interpretation and written vital materials, free of cost.
- ☒ For all documents, vital or otherwise, we provide meaningful access to LEP individuals in all language groups. Meaningful access may be providing translation of the information orally.

LEP Customer Data Analysis

Using the LEP data chart and any other sources of data, list the LEP population(s) represented in the program's geographic service area.

undetermined

Do you believe the data indicate potentially eligible LEP participants are or are not being served?

Youth and Family Services serves all clients seeking services regardless of race, gender or language if services are needed based on state statute.

What factors may be contributing to potentially eligible LEP participants not being served?⁶

The Public Health Division, WIC unit continues to serve all clients requesting services. The WIC program serves clients regardless of their race, gender or disability if they are eligible for services. WIC income eligibility is based on 185% of U.S. Department of Health and Human Services poverty guidelines.

What actions are being taken or can be taken to improve program participation and encourage enrollment of LEP populations that are under-served?

⁶ Although error in the data may explain some (or all) of the difference, especially for smaller populations, be sure to evaluate all possible factors before attributing differences to error in the data.

The Public Health division will continue to do outreach in the community to make individuals aware of services that they may be eligible for within Outagamie County. Staff will also be reminded to make sure they are entering all data fields accurately into the database system.

Please discuss the nature of LEP-related discrimination complaints filed with the agency, both formal and informal, and resolution of LEP complaints over the last calendar year:

N/A

CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

Local Agency/Recipient Name:	Outagamie County Health and Human Services
Funding Agency:	<input checked="" type="checkbox"/> Wisconsin Department of Children and Families (DCF) <input type="checkbox"/> Wisconsin Department of Health Services (DHS)
Program or Activity:	Adoption Assistance Program, Child Abuse and neglect- Child Protection Services, Child Abuse and Neglect- Prevention Services, Foster Care Payments, Kinship Care Payments, Promoting Safe and Stable Families, Child Placing Agencies-Foster Care, Qualified Residential Treatment Providers, Child Residential Care centers and Group Homes, Title IV-E CHIPS.TPR/Foster Parent Training/Legal Representation of Parents and Children, Targeted Safety Support, Community Intervention, Foster Home Recruitments, Foster Parent Retention
Geographic Service Area:	Outagamie County
Income Level(s) Analyzed:	Select the income level you will use for the Potentially Eligible Population. Note: If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts. <input checked="" type="checkbox"/> All income levels <input type="checkbox"/> Income below poverty level

	Potentially Eligible Population (from data.census.gov)		Population Served in Most Recent Calendar or Program Year (Specify Year: 2021)		
Category ¹	Number Potentially Eligible	Percentage of Total Potentially Eligible Population ²	Number Served	Percentage of Total Served Population ³	Percentage-Point Difference (= % Served - % Potentially Eligible)
Total Population	190705	100.00%	5316	100.00%	0.00
Breakdown by Race					
White	161879	84.88%	2389	44.94%	-39.94
Black or African American	2929	1.53%	355	6.68%	5.15
American Indian or Alaska Native	2743	1.44%	259	4.87%	3.43
Asian	6588	3.45%	98	1.84%	-1.61
Native Hawaiian or Pacific Islander	112	.06%	11	.021%	.15
Other	415	.22%	0	0%	-.22
More Than One Race	6616	3.47%	50	.94%	-2.53
Subtotal, Non-White	19403	10.17%	773	14.54%	4.37
Hispanic/Latino (Regardless of Race)	9423	4.94%	80	1.5%	-3.44

¹ Categories were determined by the U.S. Census (data.census.gov).

² Percentage of Total Potentially Eligible Population = (Number Potentially Eligible in the Category / Number Potentially Eligible in the Total Population) X 100%

³ Percentage of Total Served Population = (Number Served in the Category / Number Served in the Total Population) X 100%

Breakdown by Sex					
Female	95752	50.21%	2739	51.52%	1.31
Male	94953	49.79%	2481	46.67%	-3.12
Disabilities	18562	9.73%	5316	100%	90.27
Data Source(s) for Potentially Eligible Population:	US Data Census; P2, S1810				
Data Source(s) for Population Served:	The Clinical Manager				

Customer Service Population Data Analysis

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **greater than 2.00** (for example, 3.00% or 4.00%):
*These categories may be over-represented in the program's customer population.*⁴

Black or African American, American Indian or Alaskan Native, Disabilities, Subtotal of Non-White

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **less than -2.00** (for example, -3.00% or -4.00%):
These populations may be under-represented in the program's customer population.

White, More than One Race, Hispanic/Latino, Male

What factors may be contributing to any under-/over-representation?⁵

2135 clients declined to specify a race and 19 declined to answer. 96 clients were unknown with gender. The Clinical Manager does not accurately report those served in the division who may have disabilities. Outagamie County will work on securing accurate reporting for these clients served.

Do you believe these results indicate potentially eligible participants are or are not being served?

The Children, Youth and Families Division continues to serve all clients requesting services if they meet the necessary criteria outlined by the state. The CYF program services clients regardless of their race, gender or disability.

What actions are being taken or can be taken to improve program participation and encourage enrollment of populations that are under-served? (Note: Depending on the applicable federal programs, recipients may be required to take reasonable steps to conduct outreach to under-represented communities. Recipients may contact the appropriate state agency for additional information on outreach.)

The Children, Youth and Families division will continue to do outreach in the community to make individuals aware of services that they may be eligible for within Outagamie County. Staff will also be reminded to make sure they are entering all data fields accurately into the database system and to ask pertinent questions regarding sex, race and race when receiving services for data entry collection as applicable.

It may be that denials of service (including negative decisions, licensing activities, etc.) contribute toward lower-than-expected participation of a particular category. Explain whether such denials have been disproportionate for any specific protected groups within the one calendar or program year you looked at to complete the CSPA table:

⁴ Over-representation may reflect the recipient is meeting the needs of that category, outreach efforts to that category are successful, or other factors that make that category more likely to be served. Over-representation of one category is not necessarily a sign that the program is not serving all of the categories of population equally, but it does mean one or more of the other categories may be under-represented.

⁵ Although error in the data may explain some (or all) of the difference, especially for smaller populations, be sure to evaluate all possible factors before attributing differences to error in the data.

N/A

LIMITED ENGLISH PROFICIENCY (LEP) CUSTOMER DATA ANALYSIS CHART

Local Agency/Recipient Name:	Outagamie County Health and Human Services				
Funding Agency:	<input checked="" type="checkbox"/> Wisconsin Department of Children and Families (DCF) <input type="checkbox"/> Wisconsin Department of Health Services (DHS)				
Program or Activity:	Adoption Assistance Program, Child Abuse and neglect- Child Protection Services, Child Abuse and Neglect- Prevention Services, Foster Care Payments, Kinship Care Payments, Promoting Safe and Stable Families, Child Placing Agencies-Foster Care, Qualified Residential Treatment Providers, Child Residential Care centers and Group Homes, Title IV-E CHIPS, TPR/Foster Parent Training/Legal Representation of Parents and Children, Targeted Safety Support, Community Intervention, Foster Home Recruitments, Foster Parent Retention				
Geographic Service Area:	Outagamie County				
Income Level(s) Analyzed:	Select the income level you will use for the Potentially Eligible Population. Note: If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts. <input checked="" type="checkbox"/> All income levels <input type="checkbox"/> Income below poverty level				

(a) Total Potentially Eligible Population (from data.census.gov) 2019	LEP Potentially Eligible Population (from data.census.gov)		(d) Number LEP Served in Most Recent Calendar or Program Year (Specify Year: 2021)	Safe Harbor	
	(b) Number LEP Potentially Eligible in This Language Group	(c) Percentage LEP Potentially Eligible in This Language Group		Written Translation of Vital Documents Column (b) is 1,000 or more OR Column (c) is 5% or more?	Written Notice to LEP Groups of Their Right to Receive Competent Oral Language Interpretation & Translation of Vital Documents Column (b) is less than 50 AND Column (c) is 5% or more?
Spanish	4695	2.70%	17	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> yes
Hmong/Laoian ³	3425	1.97%	11	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> yes
Chinese	375	.22%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Korean	51	.03%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Vietnamese	297	.17%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Tagalog	179	.10%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
German/Germanic ⁴	767	.44%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Russian/Polish/Other Slavic ⁵	233	.13%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes

¹ Language groups were determined by the U.S. Census and [Estimates of at Least the Top 15 Languages Spoken by Individuals with Limited English Proficiency](#).² Percentage LEP Potentially Eligible = (b)/(a) X 100%³ "Hmong/Laoian" includes Hmong, Laoian, and other languages from mainland Asia and the Pacific Islands not mentioned elsewhere in this table.⁴ "German/Germanic" includes Pennsylvania Dutch.⁵ "Russian/Polish/Other Slavic" includes Bosnian, Croatian, and Serbian.

French/Patois/Haitian/Creole/Cajun	192	.11%	1	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Arabic	23	.01%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Other – Specify: Dakota, Eastern Frisian, Esperanto, N'Ko, Swahli, Udmurt	419	.24%	18	<input type="checkbox"/> yes	<input type="checkbox"/> yes

Data Source(s) for LEP Potentially Eligible Population:	US Data Census- 2019 Languages Spoken at Home C16001
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Data Source(s) for Number LEP Served:	The Clinical Manager
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Services to LEP Language Groups

Please check all that apply to recipient's service to the eligible language groups in your service area:

- ☒ Oral interpretation is provided upon request at no charge to an LEP customer.
- ☒ We hire bilingual staff with demonstrated proficiency in English and a second language, who are knowledgeable of specialized terms and concepts in English and the language they interpret, and who have received training on skills and ethics of interpretation. (Training can be provided in-house or by an external agency. Documentation of language ability, training on specialized terms and concepts, and training on skills and ethics of interpretation should be maintained.)
- ☒ We routinely collect information regarding the LEP participant's preferred primary language. The language information for each client is part of our database.
- ☒ We have identified and inventoried all vital documents for our programs or services, and the inventory list is available for inspection.
- ☒ We routinely maintain a record of the number of language interpretation services that we offer and that we provide to LEP customers, on what date, how interpretation was provided (e.g., in person or by telephone), and in what language.
- ☒ The eligible LEP population that is likely to be encountered in our service area constitutes 5% or 1,000 persons; therefore, we provide written translation of vital documents.
- ☒ Where there are fewer than 50 people in the language group that reaches the 5% trigger, we provide written notice to those LEP groups in their primary language of their right to receive oral language interpretation and written vital materials, free of cost.
- ☒ For all documents, vital or otherwise, we provide meaningful access to LEP individuals in all language groups. Meaningful access may be providing translation of the information orally.

LEP Customer Data Analysis

Using the LEP data chart and any other sources of data, list the LEP population(s) represented in the program's geographic service area.

Dakota, Eastern Frisian, Esperanto, N'Ko, Swahli, Udmurt, Hmong, Spanish, French

Do you believe the data indicate potentially eligible LEP participants are or are not being served?

The Children Youth and Families division continues to serve all clients requesting services. The CYF program services clients regardless of their race, gender or disability.

What factors may be contributing to potentially eligible LEP participants not being served?⁶

⁶ Although error in the data may explain some (or all) of the difference, especially for smaller populations, be sure to evaluate all possible factors before attributing differences to error in the data.

All clients are served in the Children Youth and Families division that are in needs of services regardless of language, race, sex or disability.

What actions are being taken or can be taken to improve program participation and encourage enrollment of LEP populations that are under-served?

The Children Youth and Families division will continue to do outreach in the community to make individuals aware of services that they may be eligible for within Outagamie County. Staff will also be reminded to make sure they are entering all data fields accurately into the database system.

Please discuss the nature of LEP-related discrimination complaints filed with the agency, both formal and informal, and resolution of LEP complaints over the last calendar year:

N/

CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

Local Agency/Recipient Name:	Outagamie County Health and Human Services
Funding Agency:	<input type="checkbox"/> Wisconsin Department of Children and Families (DCF) <input checked="" type="checkbox"/> Wisconsin Department of Health Services (DHS)
Program or Activity:	Brighter Futures Initiative, Adult Protective Services, Community Mental Health, Community Health Block Grant, Coordinated Services Team Initiative, Substance Abuse Prevention and Treatment Block Grant
Geographic Service Area:	Outagamie County
Income Level(s) Analyzed:	Select the income level you will use for the Potentially Eligible Population. Note: If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts. <input checked="" type="checkbox"/> All income levels <input type="checkbox"/> Income below poverty level

Category ¹	Potentially Eligible Population (from data.census.gov)		Population Served in Most Recent Calendar or Program Year (Specify Year:)		Percentage-Point Difference (= % Served - % Potentially Eligible)
	Number Potentially Eligible	Percentage of Total Potentially Eligible Population ²	Number Served	Percentage of Total Served Population ³	
Total Population	190705	100.00%	4054	100.00%	0.00
Breakdown by Race					
White	161879	84.88%	2674	65.96%	-18.92
Black or African American	2929	1.53%	182	4.49%	2.96
American Indian or Alaska Native	2743	1.44%	107	2.64%	-1.2
Asian	6588	3.45%	76	1.87%	-1.58
Native Hawaiian or Pacific Islander	112	.06%	12	.30%	.24
Other	415	.22%	0	0%	-.22
More Than One Race	6616	3.47%	39	.96%	-2.51
Subtotal, Non-White	19403	10.17%	416	10.26%	.09
Hispanic/Latino (Regardless of Race)	9423	4.94%	81	2.0%	-2.94
Breakdown by Sex					
Female	95752	50.21%	1843	45.46%	-4.75
Male	94953	49.79%	2195	54.14%	4.35

¹ Categories were determined by the U.S. Census (data.census.gov).

² Percentage of Total Potentially Eligible Population = (Number Potentially Eligible in the Category / Number Potentially Eligible in the Total Population) X 100%

³ Percentage of Total Served Population = (Number Served in the Category / Number Served in the Total Population) X 100%

Disabilities	18562	9.73%	4054	100%	90.27
Data Source(s) for Potentially Eligible Population:	US Data Census; P2, S1810				
Data Source(s) for Population Served:	TCM				

Customer Service Population Data Analysis

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **greater than 2.00** (for example, 3.00% or 4.00%):
These categories may be over-represented in the program's customer population.⁴

Black or African American, Disabilities, Male

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **less than -2.00** (for example, -3.00% or -4.00%):
These populations may be under-represented in the program's customer population.

White, More Than One Race, Hispanic/Latino, Female

What factors may be contributing to any under-/over-representation?⁵

805 clients declined to specify a race and 159 declined to answer. The Clinical Manager does not accurately report those served in the division who may have disabilities. Outagamie County will work on securing accurate reporting for these clients served.

Do you believe these results indicate potentially eligible participants are or are not being served?

No, the Mental Health division continues to serve all clients requesting servicers. With the addition of the Walk In Clinic a few years ago the division serves clients immediately if are in need of services. The MH program services clients regardless of their race, gender or disability.

What actions are being taken or can be taken to improve program participation and encourage enrollment of populations that are under-served? (Note: Depending on the applicable federal programs, recipients may be required to take reasonable steps to conduct outreach to under-represented communities. Recipients may contact the appropriate state agency for additional information on outreach.)

The Mental Health division will continue to do outreach in the community to make individuals aware of services that they may be eligible for within Outagamie County. Staff will also be reminded to make sure they are entering all data fields accurately into the database system.

It may be that denials of service (including negative decisions, licensing activities, etc.) contribute toward lower-than-expected participation of a particular category. Explain whether such denials have been disproportionate for any specific protected groups within the one calendar or program year you looked at to complete the CSPA table:

N/A

⁴ Over-representation may reflect the recipient is meeting the needs of that category, outreach efforts to that category are successful, or other factors that make that category more likely to be served. Over-representation of one category is not necessarily a sign that the program is not serving all of the categories of population equally, but it does mean one or more of the other categories may be under-represented.

⁵ Although error in the data may explain some (or all) of the difference, especially for smaller populations, be sure to evaluate all possible factors before attributing differences to error in the data.

LIMITED ENGLISH PROFICIENCY (LEP) CUSTOMER DATA ANALYSIS CHART

Local Agency/Recipient Name:	Outagamie County Health and Human Services
Funding Agency:	<input type="checkbox"/> Wisconsin Department of Children and Families (DCF) <input checked="" type="checkbox"/> Wisconsin Department of Health Services (DHS)
Program or Activity:	Brighter Futures Initiative, Adult Protective Services, Community Mental Health, Community Health Block Grant, Coordinated Services Team Initiative, Substance Abuse Prevention and Treatment Block Grant
Geographic Service Area:	Outagamie County
Income Level(s) Analyzed:	Select the income level you will use for the Potentially Eligible Population. Note: If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts. <input checked="" type="checkbox"/> All income levels <input type="checkbox"/> Income below poverty level

(a) Total Potentially Eligible Population (from data.census.gov)	LEP Potentially Eligible Population (from data.census.gov)		(d) Number LEP Served in Most Recent Calendar Year or Program Year (Specify Year: 2021)	Safe Harbor	
	(b) Number LEP Potentially Eligible in This Language Group	(c) Percentage LEP Potentially Eligible in This Language Group ²		Written Translation of Vital Documents	Written Notice to LEP Groups of Their Right to Receive Competent Oral Language Interpretation & Translation of Vital Documents
Spanish	4695	2.70%	17	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> yes
Hmong/Laothian ³	3425	1.97%	2	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> yes
Chinese	375	.22%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Korean	51	.03%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Vietnamese	297	.17%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Tagalog	179	.10%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
German/Germanic ⁴	767	.44%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Russian/Polish/Other Slavic ⁵	233	.13%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
French/Patois/Haitian/Creole/Cajun	192	.11%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Arabic	23	.01%	1	<input type="checkbox"/> yes	<input type="checkbox"/> yes

¹ Language groups were determined by the U.S. Census and [Estimates of at Least the Top 15 Languages Spoken by Individuals with Limited English Proficiency](#).

² Percentage LEP Potentially Eligible = $\{(b)/(a)\} \times 100\%$

³ "Hmong/Laothian" includes Hmong, Laothian, and other languages from mainland Asia and the Pacific Islands not mentioned elsewhere in this table.

⁴ "German/Germanic" includes Pennsylvania Dutch.

⁵ "Russian/Polish/Other Slavic" includes Bosnian, Croatian, and Serbian.

Other – Specify: Chukese, Elamite, Greek, Kinyarwanda	419	.24%	4	<input type="checkbox"/> yes <input type="checkbox"/> yes
US Data Census- 2019 Languages Spoken at Home C16001				
Data Source(s) for LEP Population: Potentially Eligible				

Data Source(s) for LEP Number Served:	The Clinical Manager
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Services to LEP Language Groups

Please check all that apply to recipient's service to the eligible language groups in your service area:

- ☒ Oral interpretation is provided upon request at no charge to an LEP customer.
- ☒ We hire bilingual staff with demonstrated proficiency in English and a second language, who are knowledgeable of specialized terms and concepts in English and the language they interpret, and who have received training on skills and ethics of interpretation. (Training can be provided in-house or by an external agency. Documentation of language ability, training on specialized terms and concepts, and training on skills and ethics of interpretation should be maintained.)
- ☒ We routinely collect information regarding the LEP participant's preferred primary language. The language information for each client is part of our database.
- ☒ We have identified and inventoried all vital documents for our programs or services, and the inventory list is available for inspection.
- ☒ We routinely maintain a record of the number of language interpretation services that we offer and that we provide to LEP customers, on what date, how interpretation was provided (e.g., in person or by telephone), and in what language.
- ☒ The eligible LEP population that is likely to be encountered in our service area constitutes 5% or 1,000 persons; therefore, we provide written translation of vital documents.
- ☒ Where there are fewer than 50 people in the language group that reaches the 5% trigger, we provide written notice to those LEP groups in their primary language of their right to receive oral language interpretation and written vital materials, free of cost.
- ☒ For all documents, vital or otherwise, we provide meaningful access to LEP individuals in all language groups. Meaningful access may be providing translation of the information orally.

LEP Customer Data Analysis

Using the LEP data chart and any other sources of data, list the LEP population(s) represented in the program's geographic service area.
Spanish, Hmong/Lao, Arabic, Chukese, Elamite, Greek, Kinyarwanda
Do you believe the data indicate potentially eligible LEP participants are or are not being served?
The Mental Health division continues to serve all clients requesting services. With the addition of the Walk In Clinic a few years ago the division serves clients immediately if are in need of services. The MH program services clients regardless of their race, gender or disability.
What factors may be contributing to potentially eligible LEP participants not being served? ⁶
All clients are served in the Mental Health division that are in needs of services regardless of language, race, sex or disability.
What actions are being taken or can be taken to improve program participation and encourage enrollment of LEP populations that are under-served?

⁶ Although error in the data may explain some (or all) of the difference, especially for smaller populations, be sure to evaluate all possible factors before attributing differences to error in the data.

The Mental Health division will continue to do outreach in the community to make individuals aware of services that they may be eligible for within Outagamie County. Staff will also be reminded to make sure they are entering all data fields accurately into the database system.

Please discuss the nature of LEP-related discrimination complaints filed with the agency, both formal and informal, and resolution of LEP complaints over the last calendar year:

N/

CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

Local Agency/Recipient Name:	Outagamie County Health and Human Services
Funding Agency:	<input type="checkbox"/> Wisconsin Department of Children and Families (DCF) <input checked="" type="checkbox"/> Wisconsin Department of Health Services (DHS)
Program or Activity:	Birth to 3; Children's Long Term Support Waiver; Children's Community Options Program; Alzheimer Caregiver Support
Geographic Service Area:	Outagamie County
Income Level(s) Analyzed:	Select the income level you will use for the Potentially Eligible Population. Note: If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts. <input checked="" type="checkbox"/> All income levels <input type="checkbox"/> Income below poverty level

Category ¹	Potentially Eligible Population (from data.census.gov)		Population Served in Most Recent Calendar or Program Year (Specify Year: 2021)		Percentage-Point Difference (= % Served - % Potentially Eligible)
	Number Potentially Eligible	Percentage of Total Potentially Eligible Population ²	Number Served	Percentage of Total Served Population ³	
Total Population	190705	100.00%	4723	100.00%	0.00
Breakdown by Race					
White	161879	84.88%	3601	76.24%	-8.64
Black or African American	2929	1.53%	89	1.88%	.35
American Indian or Alaska Native	2743	1.44%	69	1.46%	.02
Asian	6588	3.45%	112	2.37%	-1.08
Native Hawaiian or Pacific Islander	112	.06%	7	.15%	.09
Other	415	.22%	0	0%	.22
More Than One Race	6616	3.47%	23	.49%	-2.98
Subtotal, Non-White	19403	10.17%	300	6.35%	-3.82
Hispanic/Latino (Regardless of Race)	9423	4.94%	225	4.76%	-.18
Breakdown by Sex					
Female	95752	50.21%	2521	53.38%	3.17
Male	94953	49.79%	2196	46.50%	-3.29

¹ Categories were determined by the U.S. Census (data.census.gov).

² Percentage of Total Potentially Eligible Population = (Number Potentially Eligible in the Category / Number Potentially Eligible in the Total Population) X 100%

³ Percentage of Total Served Population = (Number Served in the Category / Number Served in the Total Population) X 100%

Disabilities	18562	9.73%	4723	100%	90.27
Data Source(s) for Potentially Eligible Population:	US Data Census; P2, S1810				
Data Source(s) for Population Served:	The Clinical Manager				

Customer Service Population Data Analysis

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **greater than 2.00** (for example, 3.00% or 4.00%):
*These categories may be over-represented in the program's customer population.*⁴

Female, Disabled,

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **less than -2.00** (for example, -3.00% or -4.00%):
These populations may be under-represented in the program's customer population.

White, More Than One Race, Male

What factors may be contributing to any under-/over-representation?⁵

472 clients declined to specify a race and 350 declined to answer. 6 clients were unknown with gender. The Clinical Manager does not accurately report those served in the division who may have disabilities. 2 Clients had assisted living devices, 2 with TDD/TTY and 3 were reported to need a wheelchair. Outagamie County will work on securing accurate reporting for these clients served.

Do you believe these results indicate potentially eligible participants are or are not being served?

The Aging, Long Term Support Division continues to serve all clients requesting services if they meet the necessary criteria outlined by the state. The CYF program services clients regardless of their race, gender or disability.

What actions are being taken or can be taken to improve program participation and encourage enrollment of populations that are under-served? (Note: Depending on the applicable federal programs, recipients may be required to take reasonable steps to conduct outreach to under-represented communities. Recipients may contact the appropriate state agency for additional information on outreach.)

The Aging, Long Term Support Division will continue to do outreach in the community to make individuals aware of services that they may be eligible for within Outagamie County. Staff will also be reminded to make sure they are entering all data fields accurately into the database system and to ask pertinent questions regarding sex, race and race when providing services for data entry collection as applicable.

It may be that denials of service (including negative decisions, licensing activities, etc.) contribute toward lower-than-expected participation of a particular category. Explain whether such denials have been disproportionate for any specific protected groups within the one calendar or program year you looked at to complete the CSPA table:

N/A

⁴ Over-representation may reflect the recipient is meeting the needs of that category, outreach efforts to that category are successful, or other factors that make that category more likely to be served. Over-representation of one category is not necessarily a sign that the program is not serving all of the categories of population equally, but it does mean one or more of the other categories may be under-represented.

⁵ Although error in the data may explain some (or all) of the difference, especially for smaller populations, be sure to evaluate all possible factors before attributing differences to error in the data.

LIMITED ENGLISH PROFICIENCY (LEP) CUSTOMER DATA ANALYSIS CHART

Local Agency/Recipient Name:	Outagamie County Health and Human Services
Funding Agency:	<input checked="" type="checkbox"/> Wisconsin Department of Children and Families (DCF) <input type="checkbox"/> Wisconsin Department of Health Services (DHS)
Program or Activity:	Birth to 3; Children's Long Term Support Waiver; Children's Community Options Program; Alzheimer Caregiver Support
Geographic Service Area:	Outagamie County
Income Level(s) Analyzed:	Select the income level you will use for the Potentially Eligible Population. Note: If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts. <input checked="" type="checkbox"/> All income levels <input type="checkbox"/> Income below poverty level

(a) Total Potentially Eligible Population (from data.census.gov) 2019	LEP Potentially Eligible Population (from data.census.gov)		(d) Number LEP Served in Most Recent Calendar Year or Program Year (Specify Year: 2021)	Safe Harbor	
	(b) Number LEP Potentially Eligible in This Language Group	(c) Percentage LEP Potentially Eligible in This Language Group ²		Written Translation of Vital Documents	Written Notice to LEP Groups of Their Right to Receive Competent Oral Language Interpretation & Translation of Vital Documents
Spanish	4695	2.70%	11	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> yes
Hmong/Laotian ³	3425	1.97%	33	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> yes
Chinese	375	.22%	2	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Korean	51	.03%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Vietnamese	297	.17%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Tagalog	179	.10%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
German/Germanic ⁴	767	.44%	1	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Russian/Polish/Other Slavic ⁵	233	.13%	1	<input type="checkbox"/> yes	<input type="checkbox"/> yes
French/Patois/Haitian/Creole/Cajun	192	.11%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Arabic	23	.01%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes

¹ Language groups were determined by the U.S. Census and *Estimates of at Least the Top 15 Languages Spoken by Individuals with Limited English Proficiency*.

² Percentage LEP Potentially Eligible = [(b)/(a)] X 100%

³ "Hmong/Laotian" includes Hmong, Laotian, and other languages from mainland Asia and the Pacific Islands not mentioned elsewhere in this table.

⁴ "German/Germanic" includes Pennsylvania Dutch.

⁵ "Russian/Polish/Other Slavic" includes Bosnian, Croatian, and Serbian.

Other – Specify: Swahli; Undetermined; Eastern Frisian; Egyptian; Elamite; Hindi; Kinyarwanda	419	.24%	18	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Data Source(s) for LEP Potentially Eligible Population:	US Data Census- 2019 Languages Spoken at Home C16001				

Data Source(s) for LEP Served:	Report from KIDS Database system provided by the State
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Services to LEP Language Groups

Please check all that apply to recipient's service to the eligible language groups in your service area:

- ☒ Oral interpretation is provided upon request at no charge to an LEP customer.
- ☒ We hire bilingual staff with demonstrated proficiency in English and a second language, who are knowledgeable of specialized terms and concepts in English and the language they interpret, and who have received training on skills and ethics of interpretation. (Training can be provided in-house or by an external agency. Documentation of language ability, training on specialized terms and concepts, and training on skills and ethics of interpretation should be maintained.)
- ☒ We routinely collect information regarding the LEP participant's preferred primary language. The language information for each client is part of our database.
- ☒ We have identified and inventoried all vital documents for our programs or services, and the inventory list is available for inspection.
- ☒ We routinely maintain a record of the number of language interpretation services that we offer and that we provide to LEP customers, on what date, how interpretation was provided (e.g., in person or by telephone), and in what language.
- ☒ The eligible LEP population that is likely to be encountered in our service area constitutes 5% or 1,000 persons; therefore, we provide written translation of vital documents.
- ☒ Where there are fewer than 50 people in the language group that reaches the 5% trigger, we provide written notice to those LEP groups in their primary language of their right to receive oral language interpretation and written vital materials, free of cost.
- ☒ For all documents, vital or otherwise, we provide meaningful access to LEP individuals in all language groups. Meaningful access may be providing translation of the information orally.

LEP Customer Data Analysis

Using the LEP data chart and any other sources of data, list the LEP population(s) represented in the program's geographic service area.

Swahli, Undetermined, Eastern Frisian, Egyptian, Elamite, Hindi, Kinyarwanda, Lao, Hmong, Spanish, Russian, German, Chinese

Do you believe the data indicate potentially eligible LEP participants are or are not being served?

The Child Support continues to serve all clients requesting services they if eligible for services .The Child Support program services clients regardless of their race, gender or disability if eligible.

What factors may be contributing to potentially eligible LEP participants not being served?⁶

All clients are served in the Child Support Division that are in needs of services regardless of language, race, sex or disability that are eligible for services We will

⁶ Although error in the data may explain some (or all) of the difference, especially for smaller populations, be sure to evaluate all possible factors before attributing differences to error in the data.

continue to work with staff on training when entering demographics and interviewing clients for data including disabilities, race, language and sex.

What actions are being taken or can be taken to improve program participation and encourage enrollment of LEP populations that are under-served?

The Child Support Division will continue to do outreach in the community to make individuals aware of services that they may be eligible for within Outagamie County. Staff will also be reminded to make sure they are entering all data fields accurately into the KIDS database system.

Please discuss the nature of LEP-related discrimination complaints filed with the agency, both formal and informal, and resolution of LEP complaints over the last calendar year:

N/A

CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

Local Agency/Recipient Name:	Outagamie County Health and Human Services
Funding Agency:	<input type="checkbox"/> Wisconsin Department of Children and Families (DCF) <input checked="" type="checkbox"/> Wisconsin Department of Health Services (DHS)
Program or Activity:	Food Share
Geographic Service Area:	Outagamie County
Income Level(s) Analyzed:	Select the income level you will use for the Potentially Eligible Population. Note: If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts. <input type="checkbox"/> All income levels <input checked="" type="checkbox"/> Income below poverty level

Category ¹	Potentially Eligible Population (from data.census.gov)		Population Served in Most Recent Calendar or Program Year (Specify Year: 2021)		Percentage-Point Difference (= % Served - % Potentially Eligible)
	Number Potentially Eligible	Percentage of Total Potentially Eligible Population ²	Number Served	Percentage of Total Served Population ³	
Total Population	72465	100.00%	18864	100.00%	0.00
Breakdown by Race					
White	64900	89.56%	12191	64.63%	-24.93
Black or African American	N/A	N/A%	1466	7.78%	N/A
American Indian or Alaska Native	N/A	N/A%	474	2.51%	N/A
Asian	6513	8.99%	1254	6.65%	-2.34
Native Hawaiian or Pacific Islander	N/A	N/A%	34	.18%	N/A
Other	N/A	N/A%	N/A	4.57%	N/A
More Than One Race	N/A	N/A%	863	4.57%	N/A
Subtotal, Non-White	6413	8.99%	4091	21.69%	12.7
Hispanic/Latino (Regardless of Race)	1965	2.71%	1703	9.03%	6.32
Breakdown by Sex					
Female	36675	50.61%	10223	54.19%	3.58
Male	35790	49.39%	8641	45.81%	-3.58
Disabilities	N/A	N/A%	3086	16.36%	N/A

¹ Categories were determined by the U.S. Census (data.census.gov).

² Percentage of Total Potentially Eligible Population = (Number Potentially Eligible in the Category / Number Potentially Eligible in the Total Population) X 100%

³ Percentage of Total Served Population = (Number Served in the Category / Number Served in the Total Population) X 100%

Data Source(s) for Potentially Eligible Population:	US Data Census; S1701;S2201 (SNAP table); using 300% of poverty level as defined by the state for eligibility. Charts S1702 were also reviewed for poverty statistics and not available for data needed.
Data Source(s) for Population Served:	CARES IM Mangement Reports

Customer Service Population Data Analysis

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **greater than 2.00** (for example, 3.00% or 4.00%):
*These categories may be over-represented in the program's customer population.*⁴

Hispanic/Latino; Female

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **less than -2.00** (for example, -3.00% or -4.00%):
These populations may be under-represented in the program's customer population.

Male; White; Asian

What factors may be contributing to any under-/over-representation?⁵

2582 clients were unknown with their ethnicity according to the report and the IM report does not include any data for "Other". Outagamie County will work on securing accurate reporting for these clients served as much as we are able to enter for more accurate data. The data census reports do not have data in either the S1701; Poverty Status in the Past 12 months report for those clients that are Black or African alone; American Indian or Alaska Native Alone; Hawaiian and Other Pacific Islander alone; or two or more races as data was unavailable to compare.

Do you believe these results indicate potentially eligible participants are or are not being served?

Food Share Program continues to serve all clients requesting services if they meet the eligibility as defined by the state. The Food Share program services clients regardless of their race, gender or disability.

What actions are being taken or can be taken to improve program participation and encourage enrollment of populations that are under-served? (Note: Depending on the applicable federal programs, recipients may be required to take reasonable steps to conduct outreach to under-represented communities. Recipients may contact the appropriate state agency for additional information on outreach.)

Staff will also be reminded to make sure they are entering all data fields accurately into the database system.

It may be that denials of service (including negative decisions, licensing activities, etc.) contribute toward lower-than-expected participation of a particular category. Explain whether such denials have been disproportionate for any specific protected groups within the one calendar or program year you looked at to complete the CSPA table:

N/A

⁴ Over-representation may reflect the recipient is meeting the needs of that category, outreach efforts to that category are successful, or other factors that make that category more likely to be served. Over-representation of one category is not necessarily a sign that the program is not serving all of the categories of population equally, but it does mean one or more of the other categories may be under-represented.

⁵ Although error in the data may explain some (or all) of the difference, especially for smaller populations, be sure to evaluate all possible factors before attributing differences to error in the data.

LIMITED ENGLISH PROFICIENCY (LEP) CUSTOMER DATA ANALYSIS CHART

Local Agency/Recipient Name:	Outagamie County Health and Human Services
Funding Agency:	<input type="checkbox"/> Wisconsin Department of Children and Families (DCF) <input checked="" type="checkbox"/> Wisconsin Department of Health Services (DHS)
Program or Activity:	Foodshare/SNAP
Geographic Service Area:	Outagamie County
Income Level(s) Analyzed:	Select the income level you will use for the Potentially Eligible Population. Note: If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts. <input type="checkbox"/> All income levels <input checked="" type="checkbox"/> Income below poverty level

(a) Total Potentially Eligible Population (from data.census.gov) 2019	LEP Potentially Eligible Population (from data.census.gov)		(d) Number LEP Served in Most Recent Calendar Year or Program Year (Specify Year: 2021)	Safe Harbor	
	(b) Number LEP Potentially Eligible in This Language Group	(c) Percentage LEP Potentially Eligible in This Language Group ²		Written Translation of Vital Documents	Written Notice to LEP Groups of Their Right to Receive Competent Oral Language Interpretation & Translation of Vital Documents
Spanish	1784	2.70%	342	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> yes
Hmong/Laoian ³	1302	1.97%	396	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> yes
Chinese	143	.22%	3	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Korean	19	.03%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Vietnamese	113	.17%	5	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Tagalog	68	.10%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
German/Germanic ⁴	291	.44%	0	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Russian/Polish/Other Slavic ⁵	89	.13%	1	<input type="checkbox"/> yes	<input type="checkbox"/> yes
French/Patois/Haitian/Creole/Cajun	73	.11%	4	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Arabic	9	.01%	8	<input type="checkbox"/> yes	<input type="checkbox"/> yes

¹ Language groups were determined by the U.S. Census and *Estimates of at Least the Top 15 Languages Spoken by Individuals with Limited English Proficiency*.

² Percentage LEP Potentially Eligible = [(b)/(a)] X 100%

³ "Hmong/Laoian" includes Hmong, Laoian, and other languages from mainland Asia and the Pacific Islands not mentioned elsewhere in this table.

⁴ "German/Germanic" includes Pennsylvania Dutch.

⁵ "Russian/Polish/Other Slavic" includes Bosnian, Croatian, and Serbian.

Other – Specify: Cambodian; Samoli; Bosnian;Thai; Farsian;	159	.24%	258	<input type="checkbox"/> yes	<input type="checkbox"/> yes
US Data Census- 2019 Languages Spoken at Home C16001 using the 300% poverty level requirement by the state					
Data Source(s) for Potentially Eligible Population:					

Data Source(s) for LEP Served:	CARES IM Mangement Reports
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Services to LEP Language Groups

Please check all that apply to recipient's service to the eligible language groups in your service area:

- ☒ Oral interpretation is provided upon request at no charge to an LEP customer.
- ☒ We hire bilingual staff with demonstrated proficiency in English and a second language, who are knowledgeable of specialized terms and concepts in English and the language they interpret, and who have received training on skills and ethics of interpretation. (Training can be provided in-house or by an external agency. Documentation of language ability, training on specialized terms and concepts, and training on skills and ethics of interpretation should be maintained.)
- ☒ We routinely collect information regarding the LEP participant's preferred primary language. The language information for each client is part of our database.
- ☒ We have identified and inventoried all vital documents for our programs or services, and the inventory list is available for inspection.
- ☒ We routinely maintain a record of the number of language interpretation services that we offer and that we provide to LEP customers, on what date, how interpretation was provided (e.g., in person or by telephone), and in what language.
- ☒ The eligible LEP population that is likely to be encountered in our service area constitutes 5% or 1,000 persons; therefore, we provide written translation of vital documents.
- ☒ Where there are fewer than 50 people in the language group that reaches the 5% trigger, we provide written notice to those LEP groups in their primary language of their right to receive oral language interpretation and written vital materials, free of cost.
- ☒ For all documents, vital or otherwise, we provide meaningful access to LEP individuals in all language groups. Meaningful access may be providing translation of the information orally.

LEP Customer Data Analysis

Using the LEP data chart and any other sources of data, list the LEP population(s) represented in the program's geographic service area.
Cambodian; Samoli; Bosnian;Thai;Farsian; 247 clients were served who noted as "Other" with no identification of which language identified.
Do you believe the data indicate potentially eligible LEP participants are or are not being served?
Food Share continues to serve all clients requesting servicers they if eligible for services .The Food Share program services clients regardless of their race, gender or disability if eligible.
What factors may be contributing to potentially eligible LEP participants not being served? ⁶
All clients are served in the Food Share Program that are in needs of services regardless of language, race, sex or disability that are eligible for services We will continue to work with staff on training when entering demographics and interviewing clients for data including disabilities, race, language and sex.
What actions are being taken or can be taken to improve program participation and encourage enrollment of LEP populations that are under-served?

⁶ Although error in the data may explain some (or all) of the difference, especially for smaller populations, be sure to evaluate all possible factors before attributing differences to error in the data.

The Food Share Program will continue to do outreach in the community to make individuals aware of services that they may be eligible for within Outagamie County. Staff will also be reminded to make sure they are entering all data fields accurately into the CARES database system.

Please discuss the **nature** of LEP-related discrimination complaints filed with the agency, both formal and informal, and resolution of LEP complaints over the last calendar year:

N/A

CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

Local Agency/Recipient Name:	Outagamie County Health and Human Services
Funding Agency:	<input checked="" type="checkbox"/> Wisconsin Department of Children and Families (DCF) <input checked="" type="checkbox"/> Wisconsin Department of Health Services (DHS)
Program or Activity:	Child Support Division
Geographic Service Area:	Outagamie County
Income Level(s) Analyzed:	Select the income level you will use for the Potentially Eligible Population. Note: If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts. <input checked="" type="checkbox"/> All income levels <input type="checkbox"/> Income below poverty level

	Potentially Eligible Population (from data.census.gov)		Population Served in Most Recent Calendar or Program Year (Specify Year: 2021)		
Category ¹	Number Potentially Eligible	Percentage of Total Potentially Eligible Population ²	Number Served	Percentage of Total Served Population ³	Percentage-Point Difference (= % Served - % Potentially Eligible)
Total Population	190705	100.00%	39414	100.00%	0.00
Breakdown by Race					
White	161879	84.88%	35652	90.5%	5.62
Black or African American	2929	1.53%	493	1.3%	-.23.
American Indian or Alaska Native	2743	1.44%	449	1.1%	-.34
Asian	6588	3.45%	1780	4.5%	1.05
Native Hawaiian or Pacific Islander	112	.06%	0	0%	-.06
Other	415	.22%	709	1.8%	.86
More Than One Race	6616	3.47%	331	.08%	-3.39
Subtotal, Non-White	19403	10.17%	3762	9.5%	-.67
Hispanic/Latino (Regardless of Race)	9423	4.94%	1571	4.0%	-.94
Breakdown by Sex					
Female	95752	50.21%	20701	52.5%	2.29
Male	94953	49.79%	18713	47.5%	-2.29
Disabilities	18562	9.73%	4912	12.5%	2.77

¹ Categories were determined by the U.S. Census (data.census.gov).

² Percentage of Total Potentially Eligible Population = (Number Potentially Eligible in the Category / Number Potentially Eligible in the Total Population) X 100%

³ Percentage of Total Served Population = (Number Served in the Category / Number Served in the Total Population) X 100%

Data Source(s) for Potentially Eligible Population:	2022 CRC_Families with Children document sent from the State to utilize for Civil Rights: US Data Census-P2
Data Source(s) for Population Served:	KIDS database system

Customer Service Population Data Analysis

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **greater than 2.00** (for example, 3.00% or 4.00%):
These categories may be over-represented in the program's customer population.⁴

Female; White

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **less than -2.00** (for example, -3.00% or -4.00%):
These populations may be under-represented in the program's customer population.

Male; More than One Race

What factors may be contributing to any under-/over-representation?⁵

The Child Support Division provides services to all persons no matter what their race, disability, language or sex if they are eligible for services.

Do you believe these results indicate potentially eligible participants are or are not being served?

The Child Support Division continues to serve all clients requesting services if they meet the necessary criteria outlined by the state. The Child Support division services clients regardless of their race, gender or disability.

What actions are being taken or can be taken to improve program participation and encourage enrollment of populations that are under-served? (Note: Depending on the applicable federal programs, recipients may be required to take reasonable steps to conduct outreach to under-represented communities. Recipients may contact the appropriate state agency for additional information on outreach.)

Staff will also be reminded to make sure they are entering all data fields accurately into the KIDS database system and to ask pertinent questions regarding sex, race and race when providing services for data entry collection as applicable.

It may be that denials of service (including negative decisions, licensing activities, etc.) contribute toward lower-than-expected participation of a particular category. Explain whether such denials have been disproportionate for any specific protected groups within the one calendar or program year you looked at to complete the CSPA table:

N/A

⁴ Over-representation may reflect the recipient is meeting the needs of that category, outreach efforts to that category are successful, or other factors that make that category more likely to be served. Over-representation of one category is not necessarily a sign that the program is not serving all of the categories of population equally, but it does mean one or more of the other categories may be under-represented.

⁵ Although error in the data may explain some (or all) of the difference, especially for smaller populations, be sure to evaluate all possible factors before attributing differences to error in the data.

Staff will also be reminded to make sure they are entering all data fields accurately into the KIDS database system and to ask pertinent questions regarding sex, race and race when providing services for data entry collection as applicable.

Please discuss the nature of LEP-related discrimination complaints filed with the agency, both formal and informal, and resolution of LEP complaints over the last calendar year:

N/A

LIMITED ENGLISH PROFICIENCY (LEP) CUSTOMER DATA ANALYSIS CHART

Local Agency/Recipient Name:	Outagamie County Health and Human Services
Funding Agency:	<input checked="" type="checkbox"/> Wisconsin Department of Children and Families (DCF) <input checked="" type="checkbox"/> Wisconsin Department of Health Services (DHS)
Program or Activity:	Child Support
Geographic Service Area:	Outagamie County
Income Level(s) Analyzed:	Select the income level you will use for the Potentially Eligible Population. Note: If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts. <input checked="" type="checkbox"/> All income levels <input type="checkbox"/> Income below poverty level

(a) Total Potentially Eligible Population (from data.census.gov) 2019	LEP Potentially Eligible Population (from data.census.gov)		(d) Number LEP Served in Most Recent Calendar Year or Program Year (Specify Year: 2021)	Safe Harbor	
	(b) Number LEP Potentially Eligible in This Language Group	(c) Percentage LEP Potentially Eligible in This Language Group ²		Written Translation of Vital Documents	Written Notice to LEP Groups of Their Right to Receive Competent Oral Language Interpretation & Translation of Vital Documents
Spanish	4695	2.70%	1063	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> yes
Hmong/Laothian ³	3425	1.97%	776	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> yes
Chinese	375	.22%	85	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Korean	51	.03%	12	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Vietnamese	297	.17%	67	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Tagalog	179	.10%	41	<input type="checkbox"/> yes	<input type="checkbox"/> yes
German/Germanic ⁴	767	.44%	174	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Russian/Polish/Other Slavic ⁵	233	.13%	53	<input type="checkbox"/> yes	<input type="checkbox"/> yes
French/Patois/Haitian/Creole/Cajun	192	.11%	43	<input type="checkbox"/> yes	<input type="checkbox"/> yes
Arabic	23	.01%	5	<input type="checkbox"/> yes	<input type="checkbox"/> yes

¹ Language groups were determined by the [U.S. Census](https://www.census.gov) and [Estimates of at Least the Top 15 Languages Spoken by Individuals with Limited English Proficiency](https://www.census.gov).² Percentage LEP Potentially Eligible = [(b)/(a)] X 100%³ "Hmong/Laothian" includes Hmong, Laothian, and other languages from mainland Asia and the Pacific Islands not mentioned elsewhere in this table.⁴ "German/Germanic" includes Pennsylvania Dutch.⁵ "Russian/Polish/Other Slavic" includes Bosnian, Croatian, and Serbian.

Other – Specify: Other (not listed in database)	419	.24%	270	<input type="checkbox"/> yes	<input type="checkbox"/> yes
2022 CRC_ Families with Children document sent from the State to utilize for Civil Rights					
Data Sources(s) for LEP Eligible Population:					
Data Sources(s) for LEP Number Served:	KIDS state database system				
<p>Services to LEP Language Groups</p> <p>Please check all that apply to recipient's service to the eligible language groups in your service area:</p> <p><input checked="" type="checkbox"/> Oral interpretation is provided upon request at no charge to an LEP customer.</p> <p><input checked="" type="checkbox"/> We hire bilingual staff with demonstrated proficiency in English and a second language, who are knowledgeable of specialized terms and concepts in English and the language they interpret, and who have received training on skills and ethics of interpretation. (Training can be provided in-house or by an external agency. Documentation of language ability, training on specialized terms and concepts, and training on skills and ethics of interpretation should be maintained.)</p> <p><input checked="" type="checkbox"/> We routinely collect information regarding the LEP participant's preferred primary language. The language information for each client is part of our database.</p> <p><input checked="" type="checkbox"/> We have identified and inventoried all vital documents for our programs or services, and the inventory list is available for inspection.</p> <p><input checked="" type="checkbox"/> We routinely maintain a record of the number of language interpretation services that we offer and that we provide to LEP customers, on what date, how interpretation was provided (e.g., in person or by telephone), and in what language.</p> <p><input checked="" type="checkbox"/> The eligible LEP population that is likely to be encountered in our service area constitutes 5% or 1,000 persons; therefore, we provide written translation of vital documents.</p> <p><input checked="" type="checkbox"/> Where there are fewer than 50 people in the language group that reaches the 5% trigger, we provide written notice to those LEP groups in their primary language of their right to receive oral language interpretation and written vital materials, free of cost.</p> <p><input checked="" type="checkbox"/> For all documents, vital or otherwise, we provide meaningful access to LEP individuals in all language groups. Meaningful access may be providing translation of the information orally.</p> <p style="text-align: center;">LEP Customer Data Analysis</p> <p>Using the LEP data chart and any other sources of data, list the LEP population(s) represented in the program's geographic service area.</p> <p>Other is not broken down in the database system.</p> <p>Do you believe the data indicate potentially eligible LEP participants are or are not being served?</p> <p>The Child Support Division continues to serve all clients requesting services if they meet the necessary criteria outlined by the state. The Child Support division services clients regardless of their race, gender or disability.</p> <p>What factors may be contributing to potentially eligible LEP participants not being served?⁶</p> <p>The Child Support Division provides services to all persons no matter what their race, disability, language or sex if they are eligible for services.</p> <p>What actions are being taken or can be taken to improve program participation and encourage enrollment of LEP populations that are under-served?</p>					

⁶ Although error in the data may explain some (or all) of the difference, especially for smaller populations, be sure to evaluate all possible factors before attributing differences to error in the data.

Staff will also be reminded to make sure they are entering all data fields accurately into the KIDS database system and to ask pertinent questions regarding sex, race and race when providing services for data entry collection as applicable.

Please discuss the nature of LEP-related discrimination complaints filed with the agency, both formal and informal, and resolution of LEP complaints over the last calendar year.

N/A

Customer Service Population Analysis (CSPA) Data Chart

Program or Activity:	Brewster Village Nursing Home
Service Area:	Outagamie County

	Eligible Population likely to be Served or Encountered in Service Area		Population Served in Most Recent Calendar or Program Year		
Category	Number	Percentage	Number	Percentage	Percentage Difference (= %Served - %Elig.)
Total Eligible Population	146,146	100%	337	100%	N/A
Breakdown by Race					
White	129,254	88.42%	329	97.63%	+9.21%
Black or African American	2060	1.41%	3	.89%	-.52%
American Indian or Alaska Native	2258	1.55%	1	.3%	-1.77%
Asian	4404	3.01%	4	1.19%	-1.82%
Native Hawaiian or Pacific Islander	77	.05%	0	0	-.05%
More Than One Race	5577	3.82%	0	0	-3.82%
Subtotal, Non-White	14376	9.83%	8	2.37%	-7.46%
Hispanic/Latino (Regardless of Race)	5740	3.93%	0	0	-3.93%
Breakdown by Sex					
Female	72965	49.91%	203	60.24%	+10.33%
Male	71097	48.64%	134	39.76%	-8.88%
Disabilities	16844	11.52%	337	100%	+88.48%

Data Source:	Americans Community Survey (ACS) data from the US Census Bureau
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Customer Service Population Data Analysis

Using the data table, determine the difference between the percentage of the total eligible population for each category and the population actually served for each category. Where a negative difference in percentage between the eligible population and the population actually served is more than the absolute value of -2% (e.g., -3%, -4%, etc.), please explain whether you believe that the result indicates recipient may not be providing service to potentially eligible participants in the particular categories.

Brewster Village is a licensed Skilled Nursing Facility that provides services to all individuals who meet the required nursing level of care and are over the age of 18, regardless of their ethnicity or race. Although individuals over the age of 18 are eligible, the majority of those seeking our services are over the age of 65.

Note: The WIOA program has an 80% adverse impact rule relevant to this analysis. Please contact the DWD Civil Rights Unit with any questions or for assistance.

What actions can be tried to improve program participation and encourage enrollment to categories of populations that are under-served? (**Note:** Depending on the applicable Federal programs, recipients may be required to take reasonable steps to conduct outreach to under-represented communities. Recipients may contact the appropriate State Agency for additional information on outreach).

Our services are listed in the county ADRC publications, including the Senior Resource Guide, as well as multiple other advertisements. We also have a website and Facebook page, and participate in numerous advocating programs, such as LeadingAge WI.

It may be that denials of service (includes negative decisions, licensing activities, etc.) contribute toward lower than expected participation of a particular category. Explain whether such denials have been disproportionate for any specific protected groups within the one calendar year you looked at to complete the CSPA table:

N/A

This Customer Service Data Analysis was prepared by:

Kristin Jaloszynski, CSW

PRINT NAME of Preparer

I am the (Administrator, Coordinator or Director) of the civil rights compliance program.

☐ ☒ **Yes** ☐ No

I met with each program administrator, coordinator or director to review the results of the analysis, the implications, and corrective action steps needed to ensure that this requirement was met.

☐ ☒ **Yes** ☐ No

I acknowledge that I understand the analysis and/or corrective actions steps needed to be in compliance with this requirement.

☐ ☒ **Yes** ☐ No

Kristin Jaloszynski, CSW

PRINT NAME of Authorized Representative



SIGNATURE of Authorized Representative

03/04/22

Date Signed

LEP Customer Data Analysis Chart

Program or Activity:	Brewster Village Nursing Home
Service Area:	Outagamie County

	(a) Total Eligible Population Likely to be Affected or Encountered in Service Area	(b) Eligible LEP Population Likely to be Affected or Encountered in Service Area	(c) Percent of Eligible LEP Population Likely to be Affected or Encountered in Service Area	(d) LEP Population Served	Safe Harbor Written Translation of Vital Documents	Safe Harbor if fewer than 50 persons in the language group: Written Notice to LEP Groups of Their Right to Receive Competent Oral Language Interpretation & Translation of Vital Documents
Language Groups	(from CSPA) Number (a)	Number (b)	Percent (c) (c) = ((b)/(a) X 100)	Served (d)	Column (c) is 5% or column (b) is 1,000 or more?	If fewer than 50 persons in language groups, eligible pop receives written notice?
Spanish	146,186	1252	.9%	0	Yes No	Yes No
Hmong	146,186	746	.5%	1	Yes No	Yes No
Chinese	146,186	144	.10%	0	Yes No	Yes No
German/Germanic	146,186	36	.02%	0	Yes No	Yes No
Arabic	146,186	0	0	0	Yes No	Yes No
Korean	146,186	37	.03%	0	Yes No	Yes No
Russian	146,186	2	.001%	0	Yes No	Yes No
Vietnamese	146,186	1	.0007%	0	Yes No	Yes No
French/Patois/Creole	146,186	32	.02%	0	Yes No	Yes No
Bosnian/Serbian/Croatian	146,186	5	.003%	0	Yes No	Yes No
Polish	146,186	2	.001%	0	Yes No	Yes No
Laotian	146,186	9	.006%	0	Yes No	Yes No
Pennsylvanian Dutch	146,186	0	0	0	Yes No	Yes No
Hindi	146,186	0	0	0	Yes No	Yes No
Albanian	146,186	0	0	0	Yes No	Yes No
Tagalog	146,186	3	.002%	0	Yes No	Yes No
Other: Specify _____	146,186				Yes No	Yes No

Services to LEP Language Groups

Please check all that apply to recipient's service to the eligible language groups in your service area:

- ☒ Oral interpretation is provided upon request at no charge to an LEP customer.
- ☒ We hire bilingual staff with demonstrated proficiency in English and a second language, knowledgeable of specialized terms and concepts in English and the language they interpret, and have received training on skills and ethics of interpretation. (Training can be provided in-house or by an external agency. Documentation of language ability, training on specialized terms and concepts, and training on skills and ethics of interpretation should be maintained.)
- ☒ We routinely collect information regarding the LEP participant's preferred primary language. The language information for each client is part of our database.
- ☒ We have identified and inventoried all vital documents for our programs or services and the inventory list is available for inspection.
- ☒ We routinely maintain a record of the number of language interpretation services that we offer and that we provide to LEP customers, on what date, how interpretation was provided (e.g., in person or by telephone), and in what language.
- ☒ The eligible LEP population that is likely to be encountered in our service area constitutes 5% or 1,000 persons; therefore, we provide written translation of vital documents.
- ☒ Where there are fewer than 50 people in the language group that reaches the 5% trigger; we provide written notice to those LEP groups in their primary language of their right to receive oral language interpretation and written vital materials, free of cost.
- ☒ For all documents, whether or not vital, we provide meaningful access to LEP individuals in all language groups. Meaningful access may be providing translation of the information orally.

Please discuss the **nature** of LEP-related discrimination complaints filed with the agency, both formal and informal, and resolution of LEP complaints over the last calendar year:

N/A

This LEP Customer Data Analysis was prepared by:

Kristin Jaloszynski, CSW

PRINT NAME of Preparer

I am the (Administrator, Coordinator or Director) of the LEP program.

☒ Yes ☐ No

I met with each program administrator, coordinator or director to review the results of the analysis, the implications, and corrective action steps needed, to ensure that this requirement was met.


☒ Yes ☐ No

I acknowledge that I understand the analysis and/or corrective actions steps needed to be in compliance with this requirement.

☒ Yes ☐ No

Kristin Jaloszynski, CSW

PRINT NAME of Authorized Representative



SIGNATURE of Authorized Representative

03/04/22

Date Signed

APPENDIX B: CRC PLAN TEMPLATE

The following pages comprise the CRC Plan Template. You are not required to use this template, but any plan you do produce must include the information in the instructions, namely data collection, customer service population data analysis for each program or activity for which you receive funding, Limited English Proficiency customer data analysis, nondiscrimination notifications, include the name, contact and function of an equal opportunity coordinator and LEP Coordinator, analysis of the meaningful access to programs and services, a self-evaluation of accessibility, complaint or grievance procedures, and training.

DATA COLLECTION

Service Delivery Our agency has a system that records the following:		
The race, ethnicity, sex/gender, disability status, and primary language of participants/applicants (Self-identification by the applicant/participant is the preferred method of obtaining characteristic data)	Yes	No
Number of potentially eligible or likely to be affected or encountered	Yes	No
Number of LEP individuals encountered by phone vs. walk-in	Yes	No
Language spoken and/or dialect of LEP participants	Yes	No
Number of eligible LEP participants by separate programs and the frequency of encounters	Yes	No
Interpretation needs and preferred language of LEP participants	Yes	No
The number of times interpretation services were offered and provided to LEP individuals and the language group for the service	Yes	No
The written translation of vital documents for LEP groups that meet the 5 percent or 1,000 threshold requirement	Yes	No
Number of sign language interpretation requests received from deaf and hard of hearing participants	Yes	No
Other accommodation requests and needs from participants with disabilities	Yes	No

If you responded “No” to any of the above questions, describe your plan for addressing the requirement(s), including target dates for completion of milestones, below:

Customer Service Population Data Analysis

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **greater than 2.00** (for example, 3.00% or 4.00%):

*These categories may be **over**-represented in the program's customer population.¹*

List the population(s) in the CSPA data chart with Percentage-Point Difference(s) **less than -2.00** (for example, -3.00% or -4.00%):

*These populations may be **under**-represented in the program's customer population.*

What factors may be contributing to any under-/over-representation?²

Do you believe these results indicate potentially eligible participants are or are not being served?

What actions are being taken or can be taken to improve program participation and encourage enrollment of populations that are under-served? (**Note:** Depending on the applicable federal programs, recipients may be required to take reasonable steps to conduct outreach to under-represented communities. Recipients may contact the appropriate state agency for additional information on outreach.)

It may be that denials of service (including negative decisions, licensing activities, etc.) contribute toward lower-than-expected participation of a particular category. Explain whether such denials have been disproportionate for any specific protected groups within the one calendar or program year you looked at to complete the CSPA table:

¹ Over-representation may reflect the recipient is meeting the needs of that category, outreach efforts to that category are successful, or other factors that make that category more likely to be served. Over-representation of one category is not necessarily a sign that the program is not serving all of the categories of population equally, but it does mean one or more of the other categories may be under-represented.

² Although error in the data may explain some (or all) of the difference, especially for smaller populations, be sure to evaluate all possible factors before attributing differences to error in the data.

This Customer Service Data Analysis was prepared by:

PRINT NAME of Preparer

I am the (Administrator, Coordinator or Director) of the civil rights compliance program.

☐ Yes ☐ No

I met with each program administrator, coordinator or director to review the results of the analysis, the implications, and corrective action steps needed to ensure that this requirement was met.

☐ Yes ☐ No

I acknowledge that I understand the analysis and/or corrective actions steps needed to be in compliance with this requirement.

☐ Yes ☐ No

PRINT NAME of Authorized Representative

SIGNATURE of Authorized Representative

Date Signed

LEP DATA ANALYSIS GOES HERE

Nondiscrimination Notification

1. Our entity uses the required HHS and/or USDA-FNS Nondiscrimination Statements and Notices, provided in Appendix D .	Yes	No	N/A
2. Our entity uses the DHS and/or DCF model for LEP Policy Statement that is provided in Appendix E . We use our own policy but is more inclusive and expansive than model policy.	Yes	No	
3. We disseminate the LEP policy in the following ways:			
a) The nondiscrimination policy is included in our operating procedures manual. Included in training documents and will look to add to Employee Handbook if needed.	Yes	No	
b) The nondiscrimination policy is posted where current customers and applicants applying for services may review and read them in their own languages.	Yes	No	
c) The appropriate “Justice For All” poster designated for USDA-FNS-specific programs is posted as follow: <ul style="list-style-type: none"> Entities administering SNAP/FoodShare, TEFAP and FSET programs must post the “Justice For All” Poster 475B Entities administering WIC programs must post the “Justice For All” poster 475C. Posters are available from the USDA .	Yes	No	N/A
d) The LEP requirements are incorporated in contracts when extending Federal financial assistance to subrecipients.	Yes	No	
4. We receive funding from HHS through a State Agency and use the required HHS nondiscrimination notices and statements, including in the 15 taglines, on all significant communications and significant publications per the Section 1557 of the Affordable Care Act regulations (45 C.F.R. part 92)?	Yes	No	N/A
5. We receive funding from USDA-FNS through a State Agency and use the appropriate FNS Nondiscrimination Statement on all websites, documents, pamphlets, brochures, etc. for the program that are produced for public information, public education, or public distribution. The Nondiscrimination Statement can be found here: FNS Nondiscrimination Statement and in Appendix D .	Yes	No	N/A

If you responded "No" to a question above, describe your plan for addressing this requirement, including target dates for completion, below:

Function of an Equal Opportunity Coordinator and LEP Coordinator

1. Our Equal Opportunity Coordinator (EOC) and LEP Coordinator (LEPC) received or will receive civil rights training within two months of assuming duties. <ul style="list-style-type: none"> Indicate date EOC received CRC Training _____ Indicate date LEPC received CRC Training _____ Some staff have received this training, but will work to get EOC/LEPC trained.	Yes	No	
2. Our EOC and LEPC have the following responsibilities:			
a) Handling service delivery and language access complaints.	Yes	No	
b) Disseminating equal opportunity and language access information to provider staff and interested persons.	Yes	No	
c) Preparing equal opportunity and language access plans and reports.	Yes	No	
e) Monitoring, performing comprehensive compliance reviews, and evaluating equal opportunity and language access activities on a program-by-program basis for the entity. Develop procedure to audit programs.	Yes	No	
f) Monitoring and evaluating civil rights, cultural awareness, disability sensitivity, and language needs of entity staff and arranging training.	Yes	No	
g) Monitoring the records and files relative to the entity's civil rights program and ensuring that subrecipients are maintaining civil rights records. Develop procedure to audit programs.	Yes	No	
h) Monitoring the civil rights compliance of funded subrecipients, if entity has any. Develop procedure to audit programs.	Yes	No	N/A
i) Meeting with the CEO, President, Director, or Administrator of the entity to provide input into policies and procedures to improve language access and equal opportunity in employment and service delivery.	Yes	No	

If you responded "No" to a question above, describe your plan for addressing this requirement, including target dates for completion, below:

Meaningful Access to Programs and Services

Our entity provides meaningful access to individuals with limited English proficiency by:		
1. Providing interpreters to assist applicants and customers with limited ability to read, speak, or understand English.	Yes	No
2. Prominently display an “I Speak” poster and a “Your Right to an Interpreter” poster in the language of the LEP groups identified in the LEP Customer Data Analysis completed by the recipients.	Yes	No
2. Providing literature, posting information and audio-visual materials in language(s) understood by LEP customers.	Yes	No
3. Providing culturally trained bilingual and/or bicultural qualified staff. State recommends ethics, cultural awareness training, etc Will look at providing some form of training for these employees	Yes	No
4. Notifying LEP customers of their right to ask for translation of vital program information at no cost to the LEP customer whenever they access programs and services.	Yes	No
5. Preparing a listing of our vital documents requiring written translation and updating the inventory list annually to reflect which documents have been translated and prioritizing those needing translation.	Yes	No
6. Developing policies on confidentiality and code of ethics for oral interpretation for contracted vendors and/or community volunteers used for interpreting by individual agency programs.	Yes	No
7. Our agency uses the following methods to ensure written translation services:		
A) Contract with an outside translation services to translate the agency’s vital documents.	Yes	No
B) Partner with community associations for paid or voluntary translation of vital documents.	Yes	No
C) Other: Specify		

8. Our entity uses the following methods for oral interpretation:		
A) Establish oral language assistance procedures for taking incoming calls from LEP persons and trained our receptionist and staff to use oral interpretation resources.	Yes	No
B) Our agency hires bilingual staff who are proficient in the following languages that are present in our service area: (Circle all that apply)	Yes	No
<ul style="list-style-type: none"> Spanish Hmong Arabic French Chinese German Pennsylvanian Dutch Albanian Other languages: (Italian) 		
Can mark Yes once training is provided for these folks.		
C) Use a language line for languages not often used in the service area.	Yes	No
D) Partner with other community organizations for paid or voluntary oral interpretation services.	Yes	No
E) Use a telephone system that allows participants to access the appropriate staff who can assist them in getting information or services needed.	Yes	No
F) Use inbound call center system with universal queue technology that provides callers with an alternative to waiting on hold when no agents are available.	Yes	No
G) Use an inbound virtual queuing call center system that has the capacity for directing LEP language groups to directly access, perform similar functions as in the English menu, and/or the ability to leave messages in their language.	Yes	No
HHS has multi-language prompts; BV does not.		
H) Other: Specify		
9. List methods used to communicate important benefit information to customers. Check all that apply:		
Video Web Sites Posters Voice Mail Messages Interactive Voice Response (IVR)	Television Radio Community Newspaper Other: Access	
If you responded "No" to a question above, describe your plan for addressing this requirement, including target dates for completion, below:		

Self-Evaluation of Accessibility to Programs and Services

ACCESS ELEMENT		
1. Has your entity completed a self-evaluation of its policies and practices to determine compliance with nondiscrimination on the basis of disability provisions?	Yes	No
2. Are all your programs or activities accessible to individuals with disabilities?	Yes	No
3. In choosing methods to make your programs accessible, have you given priority to those methods that allow individuals with disabilities to participate in your programs or activities in the most integrated setting appropriate?	Yes	No
4. Have you maintained on file the following information: <ul style="list-style-type: none"> • A list of interested persons consulted. • A brief description of the areas examined and any problems identified, and a description of any modifications made. 	Yes	No
5. Has your entity designated an Equal Opportunity Coordinator, or other personnel, to coordinate its efforts to comply with Section 504 and the ADA?	Yes	No
6. Has your entity adopted complaint procedures that provide for the prompt and equitable resolution of complaints alleging discrimination in benefits or service because of disability?	Yes	No
7. Has your entity developed a transition plan to address barriers you identified in facilities that affect equal participation of people with disabilities in your programs and activities?	Yes	No
8. Does your entity provide public notice that it does not discriminate on the basis of disability in print and audio formats on information that is intended for the public about the program or activity, including on your website?	Yes	No
9. Has your entity included a nondiscrimination clause in your contracts with subrecipients?	Yes	No

<p>10. Does your entity provide training on and know how to provide auxiliary aids and services for people with communications disabilities at no cost to the individual with disabilities:</p> <ul style="list-style-type: none"> • For deaf or hard of hearing: <ul style="list-style-type: none"> ○ Sign language, oral, and cued speech interpreters (provided by the entity) ○ Video remote interpreting services ○ Open and closed captioning of videos ○ Real time captioning • For blind or visually impaired and others with print disabilities: <ul style="list-style-type: none"> ○ Braille ○ Large print/magnification software ○ Audio recordings ○ Accessible electronic formats that can be read by screen reading software ○ Screen reading software available for applicants and members of the benefits program ○ Optical readers <p>Look into screen reading solutions.</p>	Yes	No
<p>11. Does your entity provide training on and know how to use telecommunications relay and video relay services for individuals with hearing and speech disabilities?</p>	Yes	No
<p>12. Does your entity have a policy or procedure to handle requests for auxiliary aids and services?</p>	Yes	No
<p>13. Do your employees know to give primary consideration to the person with a disability in determining what type of auxiliary aid or service to provide?</p>	Yes	No
<p>14. Does your entity use the chart below (or similar shorthand) as a means for individuals with disabilities to communicate their preferred type of auxiliary aid or service? (The symbol boxes are explained in Appendix G)</p>	Yes	No
<p>If you responded "No" to a question above, describe your plan for addressing this requirement, including target dates for completion, below:</p>		

Discrimination Complaint/Grievance Procedures

2. Our entity uses the model Discrimination Complaint Forms and Process, which is provided in Appendix F , or a substantially similar complaint form and process that explains the complaint process, including that the complainant may file a formal complaint with the appropriate State Agency or HHS/USDA-FNS, as appropriate: <ul style="list-style-type: none"> • DCF Complaint http://dcf.wisconsin.gov/civil_rights/complaint-procedures • DHS Complaint http://dhs.wisconsin.gov/civilrights/index.htm • US HHS Region V Office of Civil Rights, Chicago Complaint http://www.hhs.gov/ocr/office/file/index.html • USDA, Office of Civil Rights, Washington D.C. https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf 	Yes	No
3. Our entity's complaint resolution procedures, including the name, address and phone number of the Equal Opportunity Coordinator, limited English proficiency Coordinator or Complaint Investigator (which may be the same person), are publicly posted in language(s) understood by customers, and in a format or formats accessible to persons with visual or hearing impairments.	Yes	No
4. We have instituted a database system to track informal and formal discrimination complaints and their disposition. The system should record the number of complaints by program area, protected status/or class.	Yes	No
5. All participants in complaint investigations are advised of and protected from retaliation.	Yes	No
6. Complaints received are acknowledged within five calendar days. If extensions are needed, the complainant will be notified.	Yes	No
7. Results of the complaint investigation will be provided to complainant within 90 days of receipt of the complaint.	Yes	No
8. Corrective action is taken when evidence of discrimination has been found.	Yes	No
9. Translators, interpreters and/or readers who meet the communication needs of customers are provided by the agency during the complaint process.	Yes	No
10. Customers are permitted to have representatives of their choice during their interviews in the complaint process.	Yes	No
11. Our staff will assist complainants during the complaint process if necessary.	Yes	No
Complainants are informed that the complaint must be filed within 180 days from alleged discriminatory act. Filing times may be extended if deemed necessary.	Yes	No

If you responded "No" to a question above, describe your plan for addressing these requirements, including target dates for completion, below:

Training Requirements

1. Are new staff informed of policies regarding equal opportunity for service delivery as part of their orientation program?	Yes	No	
2. Do new staff receive training on federal CRC requirements?	Yes	No	
3. Do all staff receive CRC refresher training at the following intervals?			
a. Once every three years for entities receiving federal funds from the US DHHS.	Yes	No	N/A
b. Annually for entities receiving federal funds from the USDA FNS (e.g., FoodShare, WIC and TEFAP)	Yes	No	N/A
4. Does the entity provide CRC training for subrecipient agency staff? Will look at providing a web training link if subrecipient has no training available.	Yes	No	N/A

If you responded "No" to a question above, describe your plan for addressing these requirements, including target dates for completion, below: