

SNAP Education FNS Civil Rights Webinar Training Series on January 13, 2021 for County Departments of Social Services Q&As

1. Reminder to use DSS-10001 when using an interpreter?
Please refer to the DSS-10001 form [DSS-10001: Language Services and instructions](#) [DSS-10001ins: Instructions for completing the DSS-10001](#)
Could you give examples of frontline staff who work with SNAP-Ed agencies? Would this include contractors who with SIAs?
Frontline workers are the receptionist, lobby staff/employees, intake employees, teachers, nutrition educators including contractors staff.
2. Shouldn't the protected classes include sexual orientation and gender presentation after last year's Supreme Court decision in Bostock?
The Supreme Court upheld on June 17, 2020 that Sexual orientation and Gender Identity is protected under Title VII but not a protected class under Title VI as of yet.
3. There have been some that ask about size and Kind of dog. can they do that?
There are no restrictions related to the size and type of dog under ADA using a dog as a service animal.
4. Just wanted to clarify or make sure I heard you correctly. Even though someone has their own interpreter for sign language, did you say we ARE required to provide one instead of using their interpreter?
Yes. The liability is on the agency under Title VI to provide a free qualified interpreter. USDA issued its Departmental Regulation 4330-005, Prohibition Against National Origin Discrimination Affecting Persons with Limited English Proficiency in Programs and Activities Conducted by U.S. Department of Agriculture effective June 4, 2013. This Departmental Regulation functions as USDA's LEP Plan and is publicly available at: <http://www.ocio.usda.gov/document/departmental-regulation-4330-005>
5. So, is the age of 18 or 21 is it ok to choose to use your own interpreter after being offered free services?
Any person under 18 years of age is not authorized to provide interpretation. Only in emergencies, and you can only ask the name, address, and telephone number. The participant can continue to have their interpreter with them; however, the agency liability is to provide a qualified free interpreter.
6. If you have Spanish-speaking personnel assisting with application completion, is the DSS 10001 required?
Please refer to the DSS-10001 form [DSS-10001: Language Services and instructions](#) [DSS-10001ins: Instructions for completing the DSS-10001](#)
7. I'd like to verify that a minor under 21 is not allowed to interpret only under exigent situations. Ages 18-20 should not allow to interpret. Correct?
Any person under 18 years of age is not authorized to provide interpretation. Only in emergencies, and you can only ask the name, address, and telephone number. The participant can continue to have their interpreter with them; however, the agency liability is to provide a qualified free interpreter.
8. We often work with community partners to provide Spanish language translation - for example Head Start staff may translate for our staff. Do we need to fill out the form because we aren't providing the interpretation, but their staff is?
Yes, the DSS 10001 must be completed when the agency is using an interpreter or translator outside of the agency.
9. If the client is Spanish Speaking and we have a Spanish Speaking worker assist them, do we still do the 10001 form?

Please refer to the DSS-10001 form [DSS-10001: Language Services and instructions](#) [DSS-10001ins: Instructions for completing the DSS-10001](#)

10. Can you repeat the DSS form for individuals with LEP?
Please refer to the DSS-10001 form [DSS-10001: Language Services and instructions](#) [DSS-10001ins: Instructions for completing the DSS-10001](#)
11. I know some counties are different however, based on today's trainer, we don't have to use DSS form 10001-sp form with every point of contact and to use a logging system? I know in my previous county, we used the form each time customer needed interpreter assistance whether it was in house services or someone over 18 they used...is this correct? Thanks so much! :)
Please refer to the DSS-10001 form [DSS-10001: Language Services and instructions](#) [DSS-10001ins: Instructions for completing the DSS-10001](#)
12. Are the 10001 available in the 9 languages?
No. NC DSS is currently working on that.
13. What is the time frame for reporting a complaint?
The timeframe is 5 days. The agency must report the complaint to NC DSS Civil Rights Office within 5 days.
14. Why are Hispanic separated?
According to the US Census Bureau, ethnicity is separated from race. It is the law.
15. What is the official difference in ethnicity and race?
Ethnicity is the cultural origin of a human being. Race is physical features of a human being.
16. How should race and ethnicity be notated if there is no visual such as a phone application and client does not want to disclose it?
The application can be processed without the race and ethnicity disclosed. The local DSS agency can choose that race and ethnicity was unreported.
17. When we have a bilingual staff who is teaching the class, can they speak in both English and Spanish, teaching the nutrition education, without being licensed?
The individual must be qualified through continuing training education and provided a certificate of completion.
18. Would like to see the State provide a training for LEP interpreters annually to keep them certified properly.
NC DSS Civil Rights office is working on providing free interpreter training for all 100 counties for bilingual and interpreter staff.
19. The continued education classes for 2020 interpreting were cancelled due to COVID. Will there be an issue with this during the ME Review?
Consideration will be given because of the pandemic, COVID-19.
20. What are the approved places for the continuing ed for interpreters? Are there recommendations on the required trainings?
There are several trainings that are offered. Contact your local Area Health Education Center (AHEC) for interpreter training.
21. Do some of these requirements vary with the setting - i.e. small non-profit vs. government office?
There is no variance under Title VI.
22. We have been trying to be very mindful during COVID of how accommodations can impact ADA - for example - Zoom may be a challenge for hearing or visually impaired. Wearing a mask in-person difficult if someone is trying to read lips. Any suggestions?

Please contact NC Division of Services for the Deaf and Hard of Hearing.
<https://www.ncdhhs.gov/divisions/dsdhh>

23. Is there a reason why an 18-year-old is not considered an adult for interpreter services if a client brings them?
Any person under 18 years of age is not authorized to provide interpretation. Only in emergencies, and you can only ask the name, address, and telephone number. The participant can continue to have their interpreter with them; however, the agency liability is to provide a qualified free interpreter.
24. When you say qualified interpreter. What does that exactly mean? Licensed? or just an interpreter within intake?
A qualified interpreter is an interpreter who continues to receive continuous training education and provided a certificate.
25. DID I HEAR THAT MINIATURE HORSES ARE NOW SERVICE ANIMALS?
Yes
26. WHAT ARE SOME EXAMPLES OF CONTINUOUS EDUCATION FOR BILINGUAL WORKERS?
Participating in their local AHEC trainings.
27. If you are SNAP Outreach contractor using Spanish-speaking personnel to assist with application completion, is the DSS 10001 required?
Yes
28. what is appropriate channel to file a complaint if a Landlord is not willing to make reasonable accommodations
Contact NC Legal Aid. <https://www.legalaidnc.org/>
29. Does the certification requirement apply for native speakers too?
Yes
30. Will the bilingual training be offered yearly to keep bilingual workers certified?
Yes
31. What needs to be provided as proof that an interpreter is certified?
Certificate of Participation from an Interpreter Training class.
32. Will your training offer certification?
NC DSS Civil Rights Office Interpreter Training will offer a participation certificate.
33. for clarification our agency has a worker who speaks sign language. he is trained like as an interpreter like the Spanish speaking workers through Language Line but is not licensed. By what you said he is not allowed to interpret sign language for the agency. Is that correct
Yes
34. What is the number for the agency to call to get same day interpretation services and not where we would need to make an appointment?
Not enough information to provide an answer. However, each agency is required to have interpreter services available.
35. If they are only teaching in one language (not interpreting) do they need the certification?
Any language other than English being taught must have certificate of completion.
36. This may be a question to be answered at a later time, but wanted to know if all Annual Security Training will be in this format this year? And if so, what do we need to do or turn in for staff that aren't able to participate in the live sessions? Would it be the usual sign of sheets or will there be an electronic signature option?

Please contact NC DMA/DHB. <https://medicaid.ncdhhs.gov/>

37. I'm sorry if you've answered this and I missed it (connection issues) What do we need to do or turn in for staff that weren't able to participate in this live session? Would it be the usual sign off sheets or will there be an electronic signature option?
The webinar training recording, PowerPoint and Q&As will be posted on the NC DSS website and then provided to all 100 counties through email.
38. to verify age for interpretation do we take their statement if questionable?
Interpreters outside the agency must provide identification.
39. There does not appear to be a county transfer letter (DMA-5154) in Spanish
Thank you. We will ensure the DMA-5154 is translated in Spanish.
40. You mentioned the individual toll-free number for the Telelanguage service for each division - is this something local DSS agencies can utilize? who would then pay the invoice for the service when used?
County DSS can enjoy the terms and conditions of the tele-language contract. However, the invoice for interpreter service will be mailed to the county to pay.
41. We were instructed that our bilingual staff would need annual interpreter training, do you have an update on whether or not bilingual staff needs to attend training or be tested in some way each year to continue being an interpreter for the county? And if they need training, can one person relay the information to other bilingual staff considering these trainings are not free and our agency has over 20 interpreters.
Every interpreter and bilingual worker of the agency must attend annual/yearly continuing interpreter training as required.
42. Once the 100001 is signed per household, how long is that good for that we don't have to have another signed, just need to log the future interpretive services?
The DSS-10001 is required to be signed only at initial intake.
43. If the client is assisted entirely by phone and declines to provide their ethnicity/race, would they be required to go in person to have a visual selection completed?
No, since the information is voluntary the individual will not be required to go in person to have a visual completed. The local DSS agency can choose that race and ethnicity was unreported.
44. Do we have to provide both the DSS-1464 and the contract?
No. If there is a contract in place the Civil Rights Attestation is embedded in the General Terms and Conditions of the contract.
45. What if an individual has just recently relocated and chooses to use an interpreter out of states is this allowed?
ASL Interpreters must be licensed in NC. Spoken language Interpreters must receive a certificate of completion through annual/yearly continuing training education.
46. LEP. Are the local DSS agency's allowed to alter forms needed to complete the application process?
The local DSS agency should not alter the forms before making contact with the client first. The local DSS must contact the client to complete the application. Contact can be by a sending a letter for information needed, telephone, or face to face. The local agency must document the case confirming contact was made in order to complete the application.
47. Going back to the Justice for all posters. Should we have it only posted in the lobby or also in the intake offices that are used as the initial office visit?

Yes. The Justice for All posters must be posted in the lobby, the hallway of the intake offices and the office where the interview is being conducted.

48. As well as the Discrimination poster and Complaint poster.

Yes

49. Does the 10001 interpreter Form have to be completed for every phone call and/or face to face interaction with client?

Please refer to the DSS-10001 form [DSS-10001: Language Services and instructions](#) [DSS-10001ins: Instructions for completing the DSS-10001](#)

50. If a client refuses to use a qualified interpreter from our agency and wants to use their own and we don't have proof that this interpreter is licensed or qualified, do we give in and let them use their own and have them decline our services on the 10001?

The liability is on the agency under Title VI to provide a free qualified interpreter.