# CIVIL RIGHTS COMPLIANCE PLAN
# FOR
# RICHLAND COUNTY, WISCONSIN
## 2022 - 2025

PLANNING ASSISTANCE PROVIDED BY

SOUTHWESTERN WISCONSIN
REGIONAL PLANNING
COMMISSION

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# Summary

Federal civil rights laws prohibit discrimination of members, applicants, enrollees, and beneficiaries in programs and activities that receive Federal financial assistance. This Civil Rights Compliance plan details how Richland County, WI and its subrecipients will comply with Federal Civil Rights Laws during the 2022 – 2025 compliance period.

Richland County, WI complies with applicable Federal civil rights laws and does not discriminate on the basis of race, color, national origin, age, disability, or sex. Richland County, WI does not exclude people or treat them differently because of race, color, national origin, age, disability, or sex.

The Plan is reviewed and updated on an annual basis throughout the compliance period by the Civil Rights Officer. The Civil Rights Compliance plan is available to any state agency or member of the public.

This plan was created through an analysis of available customer service data from county departments that receive Federal funding by way of the State of Wisconsin Department of Health Services (DHS) and the Department of Children and Families (DCF). In addition to the analysis of data, the plan reviewed internal operations and procedures to ensure the county is providing meaningful access to programs and services without discrimination, proper training on civil rights compliance is being done, and the required discrimination and compliant procedures are in place and being followed.

# Recommendations

In each section of this plan, the required checklists and statements were completed to the best of the County's ability. Following this, Findings and Recommendations are made. Recommendations represent the County's plan of action over the next three years to ensure civil rights compliance. Each recommendation has an action or responsibility with a timeline, responsible party, and supporting documents.

## Responsible Party

Throughout the plan, numerous roles and responsibilities are identified including the Equal Opportunity Coordinator, the Civil Rights Compliance Officer, and the Limited English Proficiency Coordinator. Richland County, as a smaller rural county, has limited capacity for each of these designated roles and responsibilities. For the period of this plan, the County Administrator assumes the responsibility of these roles, and will act as the Civil Rights Compliance Officer for the County.

In support of the County Administrator, Department Managers will provide the required documentation annually to ensure compliance. Department Managers are responsible for ensuring the federal funding is available to the qualifying public and have the ability to collect the required data at point of service.

## Timeline

Each recommendation, or plan of action to ensure compliance, in this plan also has a timeline. The intention of this plan is to ensure the required actions are taking place continuously. Recommendations that address issues of coordination, procedure, and self-evaluation are recommended to take place on an annual basis. The annual recommendations also ensure that the plan remains current and an easy transition into the next three-year plan period takes place in 2025.

## Supporting Documents

Civil Rights Compliance not only requires the County to comply with Federal Civil Rights Laws in the delivery of services, but to also document that it is doing so. This documentation comes with administrative tasks and coordination to ensure that every County department is collecting the required data, providing meaningful access, and ensuring the required documents are available to customers. Several recommendations include the development and use of county forms to ensure the efficient and coordinated compliance with civil rights laws. Additionally, these documents ensure the County can review, revise, and complete the three-year update to the plan efficiently.

# Key Recommendations

## Civil Rights Compliance Officer Role and Responsibility

The plan identifies that in the past the County has not maintained the capacity to systematically document civil rights compliance at the County level. The primary recommendation is for the County Administrator to assume the responsibility of the Civil Rights Compliance Officer (CRC Officer) and ensure county departments are compliant in providing service to customers and documenting that service. With a responsible party, the county can ensure civil rights compliance and efficiently demonstrate this compliance in its future three-year plans.

## County Wide Procedures and Annual Review

The primary point of compliance comes at the delivery of service to customers (county residents). This service is provided at the county department level. Departments identified in this plan required to demonstrate civil rights compliance include the County Ambulance Service, the Department of Health and Human Services, and the Department of Child Support. Each of these departments found the requirements of completing this plan to present challenges. The plan recommends the county adopt procedures to be done at the county level for all departments receiving federal funding. This includes the annual submission of customer service data to the CRC Officer (County Administrator), an annual audit of these departments to ensure meaningful access is available, the completion of required training, and the identification of county resources to ensure compliance (e.g., a county listing of translator services).

## Vital Documents and Data Collection

In addition to the recommendation of county wide procedures, this plan recommends the establishment and accessibility of uniform documents to ensure meaningful access to services and required documentation. Many of the required documents are provided by DHS and DCF. Other documents, such as the annual report to the CRC Officer should be established at the county level. County departments that have never received federal funding may receive funding in the future with no knowledge or history of civil rights compliance. The County, and the Department Managers, will benefit from an established annual form – the *civil rights compliance report*.

# Data Collection

Richland County (and/or subrecipients) must collect and keep civil rights compliance data to allow the State Agencies to ascertain whether the recipient (and/or subrecipient) has complied or is complying with applicable civil rights laws.

Table 1 represents the data Richland County is required to collect and submit to the County's Civil Rights Compliance Officer (County Administrator).

| **Table 1: Data Collection for 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 requirements | 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: (see Findings and Recommendations)** | | |

## Findings and Recommendations

Only recently has Richland County had the capacity to administer customer service data collection. With the recent addition of a County Administrator (CRC Officer) the county will implement a systematic collection of customer service data.

Richland County administers federally funded programs through respective departments, primarily Health and Human Services. This data is gathered at the program level through the administration of services and is the responsibility of department managers. Current practice does not transmit data to the CRC Officer. While the county does collect much of the required data, there is required data not being collected by all departments, data is difficult to re-access by the departments, and the data is not available to the CRC Officer.

The data received to complete this plan often did not include "other" or "more than one," but rather

included “unknown.” County departments need to adjust their customer service self-identification questionnaire in order to collect the required data on “other” and “more than one.” Without this data, an adequate customer service analysis cannot be done. The designation of “unknown” also points to the data not necessarily being self-reported by customers. In the future, customer service applications should collect data that reflects the requirements of the Civil Rights Compliance Plan.

Table 2 represents recommendations to accomplish Data Collection in a manner that satisfies federal and state requirements, and considers the limitations and needs of the county and its departments.

| **Table 2: Data Collection Recommendations** | | | |
|---|---|---|---|
| **Actions:** | **Responsibility:** | **Timeline:** | **Documents Required:** |
| Develop Annual *Report to Civil Rights Compliance Officer* template that identifies the data required to be collected and reported. | CRC Officer | July 1st, 2022 | *State of Wisconsin, Civil Rights Compliance Requirements for 2022-2025.* |
| Collect and submit required data to the County Civil Rights Compliance Officer. Ensure customer service applications have correct data collection questions. | Department Heads | Annually, beginning in 2023 for calendar year 2022. | *Annual Report to Civil Rights Compliance Officer. (See Action 1)* |
| Update Civil Rights Compliance Plan with population data, including number of potentially eligible for each program. | CRC Officer | Every three years.<br>Next: 2025. | *Richland Co. Civil Rights Compliance Plan* |
| Maintain Excel Dataset that keeps track of annual report data. | CRC Officer | Annually | *Richland Co. Civil Rights Compliance Plan* |

# Customer Service Population Data Analysis

Each Richland County recipient (and/or subrecipients) is required to complete the Customer Service Population Data Analysis (CSPA) for each service or activity funding through DCF and DHS. The CSPA reviews each recipient's accessibility and determines if barriers are present that prevent protected groups from participating.

Appendix B offers a separate CSPA for each program or activity receiving federal funding. The CSPA is completed with the most recent Census or American Community Survey numbers as well as the most recent year's customer served data.

If the population of each category actually served is plus or minus 2 percentage points of the eligible population, that category of the population is being effectively served. If the population in a category actually served is more than 2% greater than the eligible population, that category may be over-represented in the program's customer service population. 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 the other categories may be under represented.

If a category of population served is more than the absolute value of -2%, that category is under-represented in the program's customer population. In the CRC Plan, the recipient should evaluate what factors may be contributing to that category being represented.

## Findings and Recommendations

The primary findings from the Customer Service Population Analysis were unsurprising. Richland County's small and mostly homogeneously white population presents problems in identifying over-represented and under-represented populations. The race, ethnicity, or disability status of just one customer can skew the data in programs with limited overall customers. The other primary finding was that some programs do not appear to be collecting data adequately or correctly, this was addressed in the Data Collection segment of this plan.

Table 3 reflects recommendations for the County to implement to meet the requirements necessary to show civil rights compliance.

**Table 3: Customer Service Population Data Analysis Recommendations**

| Actions: | Responsibility: | Timeline: | Documents Required: |
|---|---|---|---|
| Collect and submit required data to the County Civil Rights Compliance Officer. | Department Heads | Annually, beginning in 2023 for calendar year 2022. | *Annual Report to Civil Rights Compliance Officer.* |
| Utilize the customer service population data when considering service marketing to ensure that underrepresented groups are aware of the programs and services being offered. | Department Heads. | In coordination with department marketing efforts. | *Annual Report to Civil Rights Compliance Officer.* |

# Limited English Proficiency (LEP) Customer Data Analysis

The purpose of the LEP analysis is to assist Richland County with determining the level of obligation and the methods of providing oral interpretation and written translation language assistance to customers. The LEP analysis also helps to determine which language groups are likely to be encountered, to ensure that you provide meaningful access to LEP individuals in your service area.

The LEP analysis assists recipients in planning for the translations of vital documents to meet the Federal "Safe Harbor" guidelines for written translation. The requirement that Richland County translate vital documents is one way to provide meaningful access to LEP customers. Providing interpretation services at no cost to the LEP customer is a separate and distinct requirement, which generally entails providing qualified interpreters (in person or by telephone) at no cost to the LEP individual. The analysis examines the degree to which members of these language groups are being served and the steps the County needs to take to provide meaningful access to those individuals. If a language group is likely to be encountered, the County should be prepared to provide oral interpretation language assistance (in person or by telephone) at no cost to the LEP applicant or member.

Appendix C is intended to offers a separate LEP Analysis for each program or activity receiving federal funding. Data on the language requirements of LEP customers was not provided for the writing of this plan. The appendix represents the numbers of potential LEP customers and a table showing the number of LEP Customers. Analysis is completed with the most recent Census or American Community Survey numbers as well as the most recent year's customer served data.

## Findings and Recommendations

| **Table 4: Limited English Proficiency (LEP) Customer Data Analysis** | | | |
|---|---|---|---|
| **Actions:** | **Responsibility:** | **Timeline:** | **Documents Required:** |
| Departments that are required to collect this data are either unaware of the requirement or unable to access the collected data in an efficient manner. The CRC Officer should require each department submit collected data on an annual basis. | Department Heads/ CRC Officer | Annually, beginning in 2023 for calendar year 2022. | *Annual Report to Civil Rights Compliance Officer.* |
| In addition to tracking the number of LEP customers, departments and programs are also required to document the languages of the LEP customers. | Department Heads/ CRC Officer | Immediately | *Annual Report to Civil Rights Compliance Officer.* |

# Nondiscrimination Notification Checklist

| Table 5: Nondiscrimination Notification | | | |
|---|---|---|---|
| Our entity uses the required HHS and/or USDA-FNS Nondiscrimination Statements and Notices, provided in **Appendix D**. | Yes | No | N/A |
| Our entity uses the DHS and/or DCF model for LEP Policy Statement that is provided in **Appendix E**. | Yes | No | |
| We disseminate the LEP policy in the following ways: | | | |
| a) The nondiscrimination policy is included in our operating procedures manual. | 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: • 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 | |
| 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 |
| 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: See Findings and Recommendations.** | | | |

## Findings and Recommendations

Within Richland County, federally funded programs are administered by department directors and non-discrimination notices are done at the program level, nearest the customer. Similar to data collection, there is no oversight to ensure each department is utilizing up-to-date and appropriate notifications in appropriate locations. As with the findings and recommendations with data collection, Richland County has only recently established the capacity to undertake a systematic approach to ensuring notifications are appropriately posted and up-to-date.

| Table 6: Nondiscrimination Notifications | | | |
|---|---|---|---|
| **Actions:** | **Responsibility:** | **Timeline:** | **Documents Required:** |
| Audit each department to ensure the correct nondiscrimination notice is posted. | CRC Officer | Annually, beginning in 2022 | *Nondiscrimination Statements (See Appendix D).* |

# Function of Equal Opportunity Coordinator and LEP Coordinator

| Table 7: Function of an Equal Opportunity Coordinator and LEP Coordinator | | | |
|---|---|---|---|
| Our Equal Opportunity Coordinator (EOC) and LEP Coordinator (LEPC) received or will receive civil rights training within two months of assuming duties.<br>• Indicate date EOC received CRC Training _____<br>• Indicate date LEPC received CRC Training _____ | Yes | No | |
| 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 | |
| d) Monitoring, performing comprehensive compliance reviews, and evaluating equal opportunity and language access activities on a program-by-program basis for the entity. | Yes | No | |
| e) Monitoring and evaluating civil rights, cultural awareness, disability sensitivity, and language needs of entity staff and arranging training. | Yes | No | |
| f) Monitoring the records and files relative to the entity's civil rights program and ensuring that subrecipients are maintaining civil rights records. | Yes | No | |
| g) Monitoring the civil rights compliance of funded subrecipients, if entity has any. | Yes | No | N/A |
| h) 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: (see Findings and Recommendations)** | | | |

## Findings and Recommendations

Again, only recently has Richland County had the capacity to properly undertake the duties of the EOC and LEP Coordinator. Beginning in 2022, the County Administrator will ensure the responsibilities, including the training, included in the above table are being done.

| Table 8: Equal Opportunity Coordinator and LEP Coordinator Responsibility Recommendations | | | |
|---|---|---|---|
| **Actions:** | **Responsibility:** | **Timeline:** | **Documents Required:** |
| Identify within the position description of the County Administrator the responsibilities of the Equal Opportunity Coordinator and the LEP Coordinator, both of these functions should be under the formal title of Civil Rights Compliance Officer. | County Administrator/ CRC Officer | 2023 | Updated position description. |

# Meaningful Access to Programs and Services

Richland County is providing meaningful access to programs and services at the program level but more can be done to assure compliance and coordination across the county. The Civil Rights Compliance Officer should coordinate to ensure each department is in compliance with civil rights laws and that each department has access to services for LEP individuals.

The following table evaluates Richland County's meaningful access to services by individuals who are LEP. The following links access posters that are required to be posted. For preliterate populations or language groups, an audio format version of this information may be provided.

- The "I Speak" poster can be printed directly from the DHS website here: I Speak Poster
- The "Your Right to an Interpreter" poster can be printed directly from the DHS website here: Your Right to an Interpreter

| **Table 9: Meaningful access to programs and services evaluation** | | |
|---|---|---|
| Our entity provides meaningful access to individuals with limited English proficiency by: | | |
| Providing interpreters to assist applicants and customers with limited ability to read, speak, or understand English. | (Yes) | No |
| 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 |
| Providing literature, posting information and audio-visual materials in language(s) understood by LEP customers. | (Yes) | No |
| Providing culturally trained bilingual and/or bicultural qualified staff. | (Yes) | No |
| 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 |
| 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 |
| 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 |
| Our agency uses the following methods to ensure written translation services: | | |
| A) Contract with an outside translation service 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 | | |
| 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 | (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)<br>• Spanish<br>• Hmong<br>• Arabic<br>• French<br>• Chinese<br>• German<br>• Pennsylvanian Dutch<br>• Albanian<br>• Other languages: (Specify)<br>• Korean<br>• Laotian<br>• Polish<br>• Russian<br>• Vietnamese<br>• Bosnian/Serbian/Croatian<br>• Hindi<br>• Tagalog | Yes | (No) |
| 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 | (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 |
| H. Other: List methods used to communicate important benefit information to customers. Check all that apply: | | |
| ✓ Video<br>✓ Websites<br>✓ Posters<br>✓ Voice Mail Messages<br>✓ Other: social media, Interactive Voice Response (IVR).<br>✓ Television<br>✓ Radio<br>✓ Community Newspaper. | | |
| **If you responded "No" to any of the above questions, describe your plan for addressing the requirement(s), including target dates for completion, below: (See Recommendations)** | | |

| Table 10: Meaningful Access Recommendations | | | |
|---|---|---|---|
| **Actions:** | **Responsibility:** | **Timeline:** | **Documents Required:** |
| Work with Departments to ensure meaningful access to programs and services is being done | County Civil Rights Compliance Officer, EOC, and LEPC | Annually | *Annual Report to Civil Rights Compliance Officer* |
| Keep records of community members and resources that provide translation services and cultural training. | County Civil Rights Compliance Officer, EOC, and LEPC | Beginning in 2022 | |
| Prepare list of vital documents at the county level, distribute these documents annually to each department. | County Civil Rights Compliance Officer, EOC, and LEPC | 2022 | |
| Work with the Department of Health and Human Services to utilize inbound call center for LEP for the entire county. | County Civil Rights Compliance Officer, EOC, and LEPC | 2022 | |

# Self-Evaluation of Accessibility to Programs and Services

Recipients (Richland County) of Federal financial assistance shall not:

- Exclude a person with a disability from a program or activity;
- Deny a person with a disability the benefits of a program or activity;
- Afford a person with a disability an opportunity to participate in or benefit from a benefit or service that is not equal to what is afforded others;
- Provide a benefit or service to a person with a disability that is not as effective as what is provided others;
- Provide different or separate benefits or services to a person with a disability unless necessary to provide benefits or services that are as effective as what is provided others; or
- Apply eligibility criteria that tend to screen out persons with disabilities unless necessary for the provision of the service, program, or activity.

Recipients (Richland County) must:

- Provide services and programs in the most integrated setting appropriate to the needs of the qualified individual with a disability;
- Ensure that programs, services, activities, and facilities are accessible;
- Make reasonable modifications in their policies, practices, and procedures to avoid discrimination on the basis of disability, unless it would result in a fundamental alteration of the program;
- Provide auxiliary aids to persons with disabilities, at no additional cost, where necessary to afford an equal opportunity to participate in or benefit from a program or activity;
- Designate a responsible employee to coordinate their efforts to comply with Section 504 and the Co-authored by: Departments of Health Services and Children and Families 26 ADA;
- Adopt grievance procedures to handle complaints of disability discrimination in their programs and activities; and
- Provide notice that indicates:
    - o That the covered entity does not discriminate on the basis of disability; o How to contact the employee who coordinates the covered entity's efforts to comply with the law; and
    - o Information about the grievance procedures.

See HHS Disability Rights Guidance: https://www.hhs.gov/civil-rights/for-individuals/disability/index.html

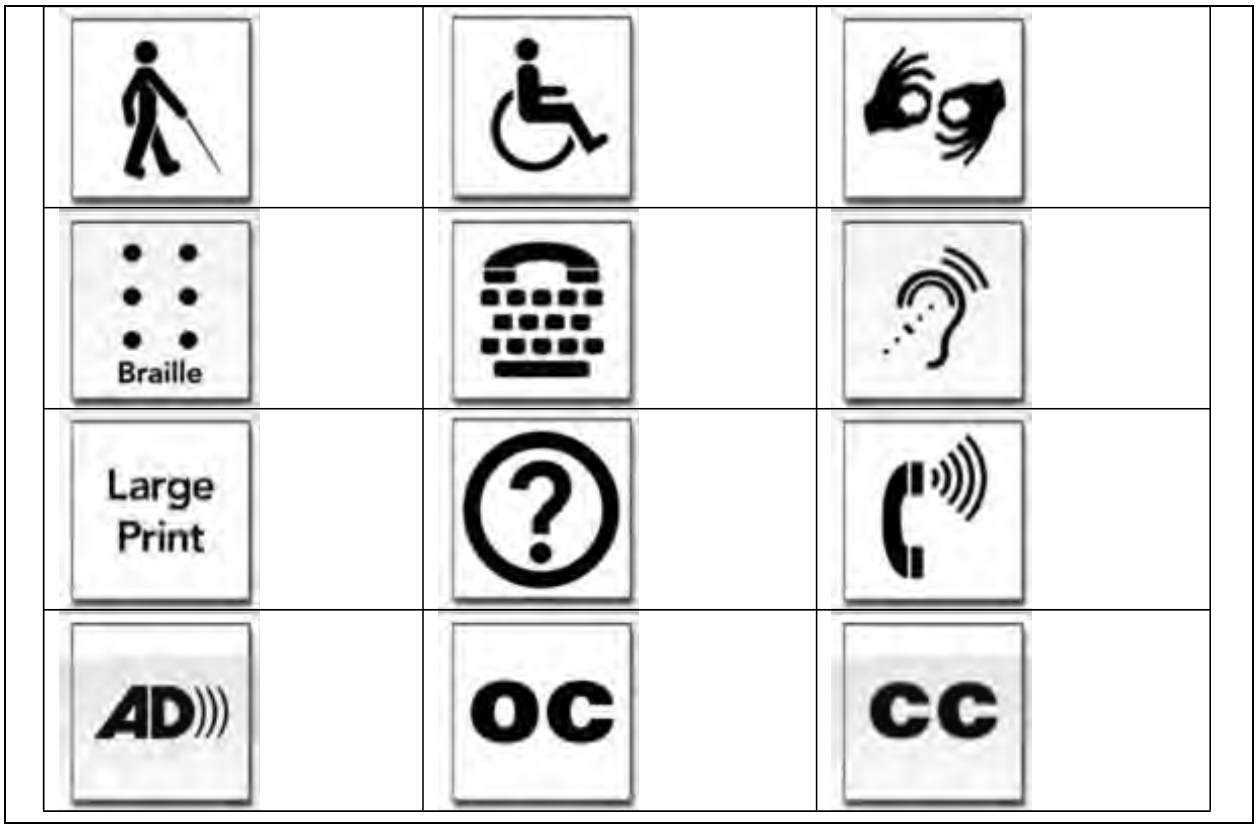
Regulations implementing Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act require recipients to evaluate their current services, policies and practices that do not or may not meet the nondiscrimination on the basis of disability requirements, and based on that evaluation, proceed to make the necessary modifications to come into compliance.

For more information about compliance with nondiscrimination on the basis of disability see U.S. DOJ ADA Primer (https://www.ada.gov/regs2010/titleII_2010/title_ii_primer.html).

The following table is meant to assist in determining a Richland County's compliance with nondiscrimination in services and programs on the basis of disability. Complete the checklist for each statement and provide clarifying information as appropriate.

| **Table 11: Self-Evaluation of Accessibility to Programs and Services.** | | |
|---|---|---|
| ACCESS ELEMENT | | |
| 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 |
| Are all your programs or activities accessible to individuals with disabilities? | (Yes) | No |
| 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 |
| Have you maintained on file the following information:<br>• A list of interested persons consulted.<br>• A brief description of the areas examined and any problems identified, and a description of any modifications made. | Yes | (No) |
| Has your entity designated at least one person to coordinate its efforts to comply with Section 504 and the ADA as the Equal Opportunity Coordinator? | (Yes) | No |
| 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 |
| 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) |
| 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 |
| Has your entity included a nondiscrimination clause in your contracts with subrecipients? | (Yes) | No |

| | | |
|---|---|---|
| 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:<br>• For deaf or hard of hearing:<br>o Sign language, oral, and cued speech interpreters (provided by the entity)<br>o Video remote interpreting services<br>o Open and closed captioning of videos<br>o Real time captioning<br>• For blind or visually impaired and others with print disabilities:<br>o Braille<br>o Large print/magnification software<br>o Audio recordings<br>o Accessible electronic formats that can be read by screen reading software<br>o Screen reading software available for applicants and members of the benefits program<br>o Optical readers | Yes | (No) |
| Does your entity provide training on and know how to use telecommunications relay and video relay services for individuals with hearing and speech disabilities? | (Yes) | No |
| Does your entity have a policy or procedure to handle requests for auxiliary aids and services? | (Yes) | No |
| 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? | (Yes) | No |
| 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? | (Yes) | No |




## Findings and Recommendations

| Table 12: Self-Evaluation of Accessibility to Programs and Services. | | | |
|---|---|---|---|
| **Actions:** | **Responsibility:** | **Timeline:** | **Documents Required:** |
| On an annual basis, evaluate each department's accessibility for disabled and LEP individuals. | CRC Officer | | *Annual Report to Civil Rights Compliance Officer.* |
| Provide programs and departments with a complaint procedure process to be used at the county level. | CRC Officer | 2022 | *Vital Documents: Complaint Procedure Process.* |
| Incorporate ADA accessibility into the County Wide Capital Improvements Plan. Each facility should be reviewed to identify issues of accessibility issues and how it will be addressed. | CRC Officer | 2022 | *County Capital Improvements Plan.* |

# Discrimination Compliant/Grievance Procedures

Richland County must develop and implement an effective system for handling complaints and grievances and may use the model provided in Appendix F to fulfill this requirement. Complainants who disagree with an informal discrimination complaint investigation decision and who decide to pursue a formal complaint with the appropriate State Agency should be assisted in referring the complainant to the appropriate State Agency for further investigation, if warranted.

DHS and DCF complaint forms are accessible on each State Agency's website.

Age discrimination complaints involving recipients that administer USDA-FNS programs, services and activities must be filed directly with the U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410. Call toll free 866-623-9992 to request a form, or fax to 202-690-7442. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Services at: 800- 877-8339, or 800-845-6136 (Spanish).

The following table is an evaluation of Richland County's Discrimination Compliant and Grievance Procedures.

| **Table 13: Discrimination Compliant/Grievance Procedures.** | | |
|---|---|---|
| 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/DOL, as appropriate:<br>• DCF Complaint http://dcf.wisconsin.gov/civil_rights/complaint-procedures<br>• DHS Complaint http://dhs.wisconsin.gov/civilrights/index.htm<br>• DWD Complaint https://dwd.wisconsin.gov/det/civil_rights/complaints.htm<br>• US HHS Region V Office of Civil Rights, Chicago Complaint http://www.hhs.gov/ocr/office/file/index.html<br>• USDA, Office of Civil Rights, Washington D.C. https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf<br>• US DOL, Civil Rights Center https://www.dol.gov/oasam/programs/crc/external-enforc-complaints.htm | (Yes) | No |
| The 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), is publicly posted in language(s) understood by customers, and is in a format or formats accessible to persons with visual or hearing impairments. | Yes | (No) |
| 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) |
| All participants in complaint investigations are advised of and protected from retaliation. | (Yes) | No |

| | | |
|---|---|---|
| Complaints received are acknowledged within five calendar days. If extensions are needed, the complainant will be notified. | Yes | No |
| Results of the complaint investigation will be provided to complainant within 90 days of receipt of the complaint. | Yes | No |
| Corrective action is taken when evidence of discrimination has been found. | Yes | No |
| Translators, interpreters and/or readers who meet the communication needs of customers are provided by the agency during the complaint process. | Yes | No |
| Customers are permitted to have representatives of their choice during their interviews in the complaint process. | Yes | No |
| 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 |

## Findings and Recommendations

| **Table 14: Discrimination Compliant/Grievance Procedures Recommendations** | | | |
|---|---|---|---|
| **Actions:** | **Responsibility:** | **Timeline:** | **Documents Required:** |
| Develop a formal complaint procedures and form that can be understood by all customers including those with visual or hearing impairments. | CRC Officer | 2022 | *Vital Documents: Complaint Procedure Process Public Form.* |
| Implement a database to track all formal complaints. | CRC Officer | 2022 | *Complaint Database* |

# Training Requirements

The following table is a checklist of training requirements.

| Table 15: Training Requirements | | | |
|---|---|---|---|
| Are new staff informed of policies regarding equal opportunity for service delivery as part of their orientation program? | | (Yes) | No |
| New staff receive training on CRC policies. | | (Yes) | No |
| Do all staff receive CRC refresher training at the following intervals? | | Yes | (No) |
| a. Once every three years for entities receiving federal funds from the US DHHS. | | Yes | (No) |
| b. Annually for entities receiving federal funds from the USDA FNS (e.g., FoodShare, WIC, TEFAP) | | Yes | (No) |
| Does the entity provide CRC training for subrecipient agency staff? | (NA) | Yes | No |

## Findings and Recommendations

| Table 16: Training Requirements | | | |
|---|---|---|---|
| **Actions:** | **Responsibility:** | **Timeline:** | **Documents Required:** |
| Provide annual training to all department heads. | CRC Officer | 3 years | |
| Provide updated policies to all departments. | CRC Officer | 1 year | *Vital Documents: Updated Policies.* |

# Appendix A: Letter of Assurance

## 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:

Richland County, WI (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: 18 Jan 2022

Printed name: Clinton Langreck

Title: Richland County Administrator

**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.

# RECIPIENT CONTACT INFORMATION

| Name of Recipient | Date this Form was Completed | |
|---|---|---|
| Richland County, WI | January 13th, 2022 | |
| Street Address | | |
| 181 W. Seminary St. | | |
| City | State | Zip Code |
| Richland Center | WI | 53581 |

| Name and title of individual designated as Equal Opportunity Coordinator for Civil Rights Compliance questions | |
|---|---|
| Clinton Langreck | |
| Address | |
| 181 W. Seminary St. | |
| Phone Number | Email Address |
| 608-649-5960 | clinton.langreck@co.richland.wi.us |

| Name and title of individual designated as LEP Coordinator to assist LEP individuals and individuals with disabilities | |
|---|---|
| Clinton Langreck, Richland County Administrator | |
| Address | |
| 181 W. Seminary St. | |
| Phone Number | Email Address |
| 608-649-5960 | clinton.langreck@co.richland.wi.us |

| Name and title of Recipient-Authorized Representative Making Assurances | |
|---|---|
| Clinton Langreck, Richland County Administrator | |
| Address | |
| 181 W. Seminary St. | |
| Phone Number | Email Address |
| 608-649-5960 | clinton.langreck@co.richland.wi.us |

**Instructions for completing Recipient Contact Information**

Fill in all the blanks on this form.
Some smaller entities may not have dedicated LEP/ADA Coordinators or Civil Rights Compliance Officers.
The individuals designated above can be (but don't have to be) same person (e.g., the Authorized Representative).

# FUNDING RELATIONSHIP TO DHS / DCF

- Recipients may receive Federal funding through one or more State Agencies to administer one or more Federal programs or activities.
- Clarifying the multiple funding streams will help the State Agencies identify mutually funded recipients as well as to determine oversight and coordination between the State Agencies.

| | | | Contract or Program Name | Funding Amount ($) |
|---|---|---|---|---|
| **DHS** | | | | |
| Our agency/entity has a direct contract, direct grant, funding agreement or purchase order (PO) with DHS to receive Federal funding. | ☒ Yes | ☐ No | 1. Richland County Health and Human Services and ADRC | HHS = $923,543<br>ADRC=$209,513 |
| | | | 2. Richland County EMS | $5249 |
| | | | 3. Pine Valley Nursing Facility | Allocation based on Patients Medicaid. |
| **DCF** | | | | |
| Our agency/entity has a direct contract, direct grant funding agreement or purchase order (PO) with DCF to receive Federal funding | ☒ Yes | ☐ No | 1. Richland County Child Support | $141,408 |
| | | | 2. Richland County Health and Human Services | $747,315 |
| | | | 3. | |
| **DHS / DCF** | | | | |
| Our agency/entity has a direct contract, grant, funding agreement, or purchase order (PO) with a County or Consortium that receives Federal funding from DCF/DHS.<br>Name of County or Consortium: Capital I.M. | ☒ Yes | ☐ No | 1. Richland County Health and Human Services | $968,995 |
| | | | 2. | |
| | | | 3. | |
| Our agency/entity has a subcontract with another entity that receives Federal funding from DHS/DCF.<br>Name of the entity/entities: | ☐ Yes | ☒ No | 1. | |
| | | | 2. | |
| | | | 3. | |

**Instructions for completing Funding Relationship to DHS or DCF**

Fill in all the blanks on the above form. Your response should identify all Federal funding you receive from each of the State Agencies or recipients.

# FUNDED PROGRAMS CHECKLIST

Completing this section will allow DHS or DCF to identify the Federally funded programs and activities that you administer.

**Check the type of program or funding applicable to your entity.**

**Use this checklist for Department of Health Services (DHS)**

Please check all the funded programs/services/activities administered with grant/contract or other agreements received from Department of Health Services (DHS):

**HHS (CMS, SAMHSA, CDC, CMHS, ACL, HRSA, OMH, etc.) Programs:**

- ☐ BadgerCare Plus
- ☒ Birth to 3
- ☒ Children's Long Term Support Waiver
- ☒ Children's Community Options Program
- ☐ Family Care
- ☐ Family Planning Only
- ☐ IRIS
- ☐ Katie Beckett
- ☐ Medicaid for the Elderly, Blind, or Disabled
- ☐ Medicaid Purchase Plan
- ☐ PACE
- ☐ SeniorCare
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Well Women Medicaid
- ☒ Other, specify: Adult Protective Services, ADJ Alzheimer Caregiver Support, Mental Health and Substance Abuse Block Grants, CST, Communty Mental Health Programs, EMS Training.

**USDA (FNS) Programs:**

- ☐ FoodShare/SNAP
- ☐ Food Stamp Employment and Training (FSET)
- ☐ Temporary Emergency Food Assistance Program (TEFAP)
- ☐ Women Infants and Children (WIC)
- ☐ Commodity Supplemental Food Program
- ☐ WIC Farmer's Market Nutrition Program
- ☐ Senior Farmer's Market Nutrition Program
- ☐ Other, specify:

**Use this checklist for Department of Children and Families (DCF)**

Check all the funded programs/services/activities administered with grants/contracts or other agreements received from Department of Children and Families (DCF):

- ☐ Adoption Assistance Program
- ☐ Adoption Finalization and Post Adoption Services
- ☐ Brighter Futures Initiative
- ☒ Child Abuse and Neglect - Child Protective Services
- ☐ Child Abuse and Neglect – Prevention Services
- ☐ Child Care Certification or Licensing
- ☐ Child Care Resource and Referral
- ☐ Child Care Quality Improvement
- ☐ Child Placing Agencies - Foster Care
- ☐ Qualified Residential Treatment Providers, Child Residential Care Centers & Group Homes
- ☒ Child Support
- ☒ Child Welfare Case Management Services
- ☐ Community Services Block Grant Services
- ☐ Domestic Violence/Domestic Abuse
- ☐ Foster Care Payments
- ☐ Home Visiting Services
- ☐ Independent Living Services
- ☐ Indian Child Welfare
- ☒ Kinship Care Payments
- ☐ Milwaukee Child Welfare Program Service Provider
- ☒ Promoting Safe and Stable Families
- ☐ Refugee Assistance and Services
- ☐ Runaway Youth Services
- ☐ TANF Funded Services - Including Transitional Jobs and Children First
- ☐ Wisconsin Shares - Child Care Subsidy Program
- ☐ Wisconsin Works (W-2) Programs
- ☒ Youth Aids and Youth Justice grants
- ☐ Other, specify: AODA

**Please list your specific Federal grant/funding source if not listed above.**

**Note:** The checklist is not an exhaustive list of programs funded through the DHS or DCF with HHS and USDA-FNS. If the Federally funded program, grant or service agreement is not listed, enter the name in the appropriate “Other: Specify” space to specify the program, grant or funding agreement administered by the agency/entity.

# Appendix B: Customer Service Population Data Analysis by Program, 2021

# CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Health and Human Services- Richland County |
| **Funding Agency:** | ☐ Wisconsin Department of Children and Families (DCF)<br>☒ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | Adult Protective Services |
| **Geographic Service Area:** | Richland County |
| **Income Level(s) Analyzed:** | Select the income level you will use for the Potentially Eligible Population.<br>**Note:** If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts.<br>☒ **All income levels** ☐ **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 | 13411 | 100.00% | 101 | 100.00% | 0.00 |
| **Breakdown by Race** | | | | | |
| White | 12941 | 96.5% | 99 | 98% | 1.5 |
| | | | | | |
| Black or African American | 76 | 0.6% | 1 | 0.9% | 0.3 |
| American Indian or Alaska Native | 44 | 0.3% | 0 | 0.0% | -0.3 |
| Asian | 117 | 0.9% | 0 | 0.0% | 0.0 |
| Native Hawaiian or Pacific Islander | 1 | 0.0% | 1 | 0.9% | 0.9 |
| Other | 158 | 1.2% | 0 | 0.0% | 0.0 |
| More Than One Race | 74 | 0.6% | 0 | 0.0% | 0.0 |
| | | | | | |
| Subtotal, Non-White | 470 | 3.5% | 2 | 1.9% | -1.6 |
| | | | | | |
| Hispanic/Latino (Regardless of Race) | 205 | 1.5% | 2 | 1.9% | 0.3 |
| **Breakdown by Sex** | | | | | |
| Female | 6735 | 50.2% | 63 | 62.3% | 12.1 |
| Male | 6676 | 49.8% | 38 | 37.6% | -12.2 |
| | | | | | |
| Disabilities | 2103 | 15.7% | 57 | 56.4% | 40.7 |

[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:** | https://dcf.wisconsin.gov/dashboard/civilrights/crc |

| | |
|---|---|
| **Data Source(s) for Population Served:** | Richland County Health and Human Services. |

## 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

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]

Unknown.

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

No

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.)

Outreach to populations identified as under-served through other service programs. Ensuring "other" is a data set being collected for customers.

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:

Denials have not contributed to a lower-than-expected participation of a particular category.

[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.

# CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Health and Human Services- Richland County |
| **Funding Agency:** | ☐ Wisconsin Department of Children and Families (DCF)<br>☒ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | Alzheimer Caregiver Support |
| **Geographic Service Area:** | Richland County |
| **Income Level(s) Analyzed:** | Select the income level you will use for the Potentially Eligible Population.<br>**Note:** If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts.<br>☒ **All income levels** ☐ **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 | 13411 | 100.00% | 161 | 100.00% | 0.00 |
| **Breakdown by Race** | | | | | |
| White | 12941 | 96.5% | 161 | 100% | 3.5 |
| | | | | | |
| Black or African American | 76 | 0.6% | 0 | 0% | -0.6 |
| American Indian or Alaska Native | 44 | 0.3% | 0 | 0% | -0.3 |
| Asian | 117 | 0.9% | 0 | 0% | -0.9 |
| Native Hawaiian or Pacific Islander | 1 | 0.0% | 0 | 0% | 0.0 |
| Other | 158 | 1.2% | 0 | 0% | -1.2 |
| More Than One Race | 74 | 0.6% | 0 | 0% | -0.6 |
| | | | | | |
| Subtotal, Non-White | 470 | 3.5% | 0 | 0% | -3.5 |
| | | | | | |
| Hispanic/Latino (Regardless of Race) | 205 | 1.5% | 3 | 1.8% | 0.3 |
| **Breakdown by Sex** | | | | | |
| Female | 6735 | 50.2% | 79 | 49% | -1.2 |
| Male | 6676 | 49.8% | 82 | 50.9% | 1.1 |
| | | | | | |
| Disabilities | 2103 | 15.7% | 0 | 0% | -15.7 |

[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:** | https://dcf.wisconsin.gov/dashboard/civilrights/crc |

| | |
|---|---|
| **Data Source(s) for Population Served:** | Richland County Health and Human Services. |

## 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]

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.*

Disabled and Non-white

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

Outreach regarding the availability of the program may not be reaching all populations. Non-white populations are often younger than the white population.

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

No

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.)

Outreach to populations identified as under-served through other service programs. Ensuring "other" is a data set being collected for customers.

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:

Denials have not contributed to a lower-than-expected participation of a particular category.

[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.

# CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Health and Human Services- Richland County |
| **Funding Agency:** | ☐ Wisconsin Department of Children and Families (DCF)<br>☒ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | Birth to 3 |
| **Geographic Service Area:** | Richland County |
| **Income Level(s) Analyzed:** | Select the income level you will use for the Potentially Eligible Population.<br>**Note:** If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts.<br>☒ **All income levels** ☐ **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 | 3109 | 100.00% | 48 | 100.00% | 0.00 |
| **Breakdown by Race** | | | | | |
| White | 3023 | 97.2% | 46 | 96% | -1.2 |
| | | | | | |
| Black or African American | 1 | 0% | 1 | 2% | 2 |
| American Indian or Alaska Native | 0 | 0% | 0 | 0% | 0 |
| Asian | 4 | 0.1% | 0 | 0% | -0.1 |
| Native Hawaiian or Pacific Islander | 0 | 0% | 1 | 2% | 2 |
| Other | 81 | 2.6% | 0 | 0% | -2.6 |
| More Than One Race | 0 | 0% | 0 | 0% | 0 |
| | | | | | |
| Subtotal, Non-White | 86 | 2.8% | 2 | 4.2% | 1.4 |
| | | | | | |
| Hispanic/Latino (Regardless of Race) | 71 | 2.3% | 1 | 2% | -0.3 |
| **Breakdown by Sex** | | | | | |
| Female | 1683 | 54.1% | 15 | 31% | -23.1 |
| Male | 1426 | 45.9% | 33 | 69% | 23.1 |
| | | | | | |
| Disabilities | 488 | 15.7% | 2 | 4.2% | -11.5 |

[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:** | https://dcf.wisconsin.gov/dashboard/civilrights/crc Population: Families with Children |

| | |
|---|---|
| **Data Source(s) for Population Served:** | Richland County Health and Human Services. |

## 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]

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.*

Female, Disabled, and other race.

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

Unknown

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

No

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.)

Improve data collection of actual customers served and outreach to underserved population.

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:

Denials have not contributed to a lower-than-expected participation of a particular category.

[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.

# CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Health and Human Services- Richland County |
| **Funding Agency:** | ☒ Wisconsin Department of Children and Families (DCF)<br>☐ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | Child Abuse and Neglect |
| **Geographic Service Area:** | Richland County |
| **Income Level(s) Analyzed:** | Select the income level you will use for the Potentially Eligible Population.<br>**Note:** If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts.<br>☒ **All income levels** ☐ **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 | 3109 | 100.00% | 289 | 100.00% | 0.00 |
| **Breakdown by Race** | | | | | |
| White | 3023 | 97.2% | | % | |
| | | | | | |
| Black or African American | 1 | 0.0% | | % | |
| American Indian or Alaska Native | 0 | 0% | | % | |
| Asian | 4 | 0.1% | | % | |
| Native Hawaiian or Pacific Islander | 0 | 0% | | % | |
| Other | 81 | 2.6% | | % | |
| More Than One Race | 0 | 0% | | % | |
| | | | | | |
| Subtotal, Non-White | 86 | 2.8% | | % | |
| | | | | | |
| Hispanic/Latino (Regardless of Race) | 71 | 2.3% | 7 | 2.4% | 0.1 |
| **Breakdown by Sex** | | | | | |
| Female | 1683 | 54.1% | 176 | 61% | 6.9 |
| Male | 1426 | 45.9% | 113 | 39% | -6.9 |
| | | | | | |
| Disabilities | 488 | 15.7% | | % | |

[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:** | https://dcf.wisconsin.gov/dashboard/civilrights/crc "Population: Families with Children" |

| | |
|---|---|
| **Data Source(s) for Population Served:** | Richland County Health and Human Services. |

## 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

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]

Data is not adaquately collected.

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

No

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.)

Improve data collecton of actual customers served.

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:

Denials have not contributed to a lower-than-expected participation of a particular category.

[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.

# CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Health and Human Services- Richland County |
| **Funding Agency:** | ☒ Wisconsin Department of Children and Families (DCF)<br>☐ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | Child Welfare Case Management |
| **Geographic Service Area:** | Richland County |
| **Income Level(s) Analyzed:** | Select the income level you will use for the Potentially Eligible Population.<br>**Note:** If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts.<br>☒ **All income levels** ☐ **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 | 3109 | 100.00% | 167 | 100.00% | 0.00 |
| **Breakdown by Race** | | | | | |
| White | 3023 | 97.2% | 124 | 74.3% | -22.9 |
| | | | | | |
| Black or African American | 1 | 0.0% | 15 | 9.0% | 9.0 |
| American Indian or Alaska Native | 0 | 0% | 0 | 0% | 0 |
| Asian | 4 | 0.1% | 0 | 0% | -0.1 |
| Native Hawaiian or Pacific Islander | 0 | 0% | 1 | 0.5% | 0.5 |
| Other | 81 | 2.6% | 27 | 16.2% | 13.6 |
| More Than One Race | 0 | 0% | 0 | 0% | 0.0 |
| | | | | | |
| Subtotal, Non-White | 86 | 2.8% | 43 | 25.7% | 22.9 |
| | | | | | |
| Hispanic/Latino (Regardless of Race) | 71 | 2.3% | 0 | 0% | -2.3 |
| **Breakdown by Sex** | | | | | |
| Female | 1683 | 54.1% | 87 | 52.1% | -2.0 |
| Male | 1426 | 45.9% | 80 | 47.9% | 2.0 |
| | | | | | |
| Disabilities | 488 | 15.7% | 25 | 14.9% | -0.8 |

[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:** | https://dcf.wisconsin.gov/dashboard/civilrights/crc "Population: Families with Children" |

| | |
|---|---|
| **Data Source(s) for Population Served:** | Richland County Health and Human Services. |

## 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]

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

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

Unknown.

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

No

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.)

Improve data collecton of actual customers served and undertake outreach to underrepresented groups.

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:

Denials have not contributed to a lower-than-expected participation of a particular category.

[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.

# CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Health and Human Services- Richland County |
| **Funding Agency:** | ☐ Wisconsin Department of Children and Families (DCF)<br>☒ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | Children's Community Options Program |
| **Geographic Service Area:** | Richland County |
| **Income Level(s) Analyzed:** | Select the income level you will use for the Potentially Eligible Population.<br>**Note:** If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts.<br>☒ **All income levels** ☐ **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 | 3109 | 100.00% | 41 | 100.00% | 0.00 |
| **Breakdown by Race** | | | | | |
| White | 3023 | 97.2% | 38 | 92.7% | -4.5 |
| | | | | | |
| Black or African American | 1 | 0.0% | 1 | 2.4% | 2.4 |
| American Indian or Alaska Native | 0 | 0% | 0 | 0% | 0 |
| Asian | 4 | 0.1% | 1 | 2.4% | 2.3 |
| Native Hawaiian or Pacific Islander | 0 | 0% | 1 | 2.4% | 2.4 |
| Other | 81 | 2.6% | 0 | 0% | -2.6 |
| More Than One Race | 0 | 0% | 0 | 0% | 0 |
| | | | | | |
| Subtotal, Non-White | 86 | 2.8% | 3 | 7.3% | 4.5 |
| | | | | | |
| Hispanic/Latino (Regardless of Race) | 71 | 2.3% | 1 | 2.4% | 0.1 |
| **Breakdown by Sex** | | | | | |
| Female | 1683 | 54.1% | 17 | 41.5% | -12.6 |
| Male | 1426 | 45.9% | 24 | 58.5% | 12.6 |
| | | | | | |
| Disabilities | 488 | 15.7% | 33 | 80.5% | |

[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:** | https://dcf.wisconsin.gov/dashboard/civilrights/crc "Population: Families with Children" |

| | |
|---|---|
| **Data Source(s) for Population Served:** | Richland County Health and Human Services. |

## 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]

Male, Non-White, Black or African American, Asian, Native Hawiian or Pacific Islander

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.*

Female, Other, White

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

Small Data set.

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

No

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.)

Improve data collecton of actual customers served.

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:

Denials have not contributed to a lower-than-expected participation of a particular category.

[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.

# CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Health and Human Services- Richland County |
| **Funding Agency:** | ☐ Wisconsin Department of Children and Families (DCF)<br>☒ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | Children's Long Term Support Waiver |
| **Geographic Service Area:** | Richland County |
| **Income Level(s) Analyzed:** | Select the income level you will use for the Potentially Eligible Population.<br>**Note:** If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts.<br>☒ **All income levels** ☐ **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 | 3109 | 100.00% | 45 | 100.00% | 0.00 |
| **Breakdown by Race** | | | | | |
| White | 3023 | 97.2% | 43 | 96% | 1.2 |
| | | | | | |
| Black or African American | 1 | 0.0% | 0 | 0% | 0 |
| American Indian or Alaska Native | 0 | 0% | 0 | 0% | 0 |
| Asian | 4 | 0.1% | 1 | 2% | 1.9 |
| Native Hawaiian or Pacific Islander | 0 | 0% | 1 | 2% | 2 |
| Other | 81 | 2.6% | 0 | 0% | -2.6 |
| More Than One Race | 0 | 0% | 0 | 0% | 0 |
| | | | | | |
| Subtotal, Non-White | 86 | 2.8% | 2 | 4% | 1.2 |
| | | | | | |
| Hispanic/Latino (Regardless of Race) | 71 | 2.3% | 1 | 2% | -0.3 |
| **Breakdown by Sex** | | | | | |
| Female | 1683 | 54.1% | 20 | 45% | -9.1 |
| Male | 1426 | 45.9% | 25 | 55% | 9.1 |
| | | | | | |
| Disabilities | 488 | 15.7% | 39 | 87% | 71.3 |

[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:** | https://dcf.wisconsin.gov/dashboard/civilrights/crc "Population: Families with Children" |

| | |
|---|---|
| **Data Source(s) for Population Served:** | Richland County Health and Human Services. |

## 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]

Male, 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.*

Female, Other

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

Poor data collection.

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

No

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.)

Improve data collecton of actual customers served.

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:

Denials have not contributed to a lower-than-expected participation of a particular category.

[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.

# CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Health and Human Services- Richland County |
| **Funding Agency:** | ☐ Wisconsin Department of Children and Families (DCF)<br>☒ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | CST |
| **Geographic Service Area:** | Richland County |
| **Income Level(s) Analyzed:** | Select the income level you will use for the Potentially Eligible Population.<br>**Note:** If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts.<br>☒ **All income levels** ☐ **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 | 3109 | 100.00% | 35 | 100.00% | 0.00 |
| **Breakdown by Race** | | | | | |
| White | 3023 | 97.2% | 27 | 77.1% | -20.1 |
| | | | | | |
| Black or African American | 1 | 0.0% | 6 | 17.1% | 17.1 |
| American Indian or Alaska Native | 0 | 0% | 0 | 0% | 0 |
| Asian | 4 | 0.1% | 0 | 0% | -0.1 |
| Native Hawaiian or Pacific Islander | 0 | 0% | 2 | 5.7% | 5.7 |
| Other | 81 | 2.6% | 0 | 0% | -2.6 |
| More Than One Race | 0 | 0% | 0 | 0% | 0 |
| | | | | | |
| Subtotal, Non-White | 86 | 2.8% | 8 | 22.8% | 20 |
| | | | | | |
| Hispanic/Latino (Regardless of Race) | 71 | 2.3% | 1 | 2.8% | 0.5 |
| **Breakdown by Sex** | | | | | |
| Female | 1683 | 54.1% | 16 | 45.7% | -8.4 |
| Male | 1426 | 45.9% | 19 | 54.3% | 8.4 |
| | | | | | |
| Disabilities | 488 | 15.7% | 16 | 45.7% | 30 |

[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:** | https://dcf.wisconsin.gov/dashboard/civilrights/crc "Population: Families with Children" |

| | |
|---|---|
| **Data Source(s) for Population Served:** | Richland County Health and Human Services. |

## 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, Native Hawiian or Pacific Islander, Male, 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.*

Female, Other, White

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

Small Data set.

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

No

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.)

Improve data collecton of actual customers served.

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:

Denials have not contributed to a lower-than-expected participation of a particular category.

[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.

# CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Health and Human Services- Richland County |
| **Funding Agency:** | ☐ Wisconsin Department of Children and Families (DCF)<br>☒ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | EMS Training |
| **Geographic Service Area:** | Richland County |
| **Income Level(s) Analyzed:** | Select the income level you will use for the Potentially Eligible Population.<br>**Note:** If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts.<br>☒ **All income levels** ☐ **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 | 13411 | 100.00% | 2 | 100.00% | 0.00 |
| **Breakdown by Race** | | | | | |
| White | 12941 | 96.5% | 2 | 100% | 3.5 |
| | | | | | |
| Black or African American | 76 | 0.6% | 0 | 0% | -0.6 |
| American Indian or Alaska Native | 44 | 0.3% | 0 | 0% | -0.3 |
| Asian | 117 | 0.9% | 0 | 0% | -0.9 |
| Native Hawaiian or Pacific Islander | 1 | 0.0% | 0 | 0% | 0 |
| Other | 158 | 1.2% | 0 | 0.0% | -1.2 |
| More Than One Race | 74 | 0.6% | 0 | 0.0% | -0.6 |
| | | | | | |
| Subtotal, Non-White | 470 | 3.5% | 0 | 0% | -3.5 |
| | | | | | |
| Hispanic/Latino (Regardless of Race) | 205 | 1.5% | 0 | 0% | -1.5 |
| **Breakdown by Sex** | | | | | |
| Female | 6735 | 50.2% | 2 | 100% | 49.8 |
| Male | 6676 | 49.8% | 0 | 0% | -49.8 |
| | | | | | |
| Disabilities | 2103 | 15.7% | 0 | 0% | -15.7 |

[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:** | https://dcf.wisconsin.gov/dashboard/civilrights/crc |

| | |
|---|---|
| **Data Source(s) for Population Served:** | Richland County Health and Human Services. |

## 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

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]

Only two customers skews data.

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

No

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.)

Outreach to populations identified as under-served through other service programs. Ensuring "other" is a data set being collected for customers.

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:

Denials have not contributed to a lower-than-expected participation of a particular category.

[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.

**DEPARTMENT OF HEALTH SERVICES** **STATE OF WISCONSIN**
F-00165D (12/2021)

# CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Health and Human Services- Richland County |
| **Funding Agency:** | ☐ Wisconsin Department of Children and Families (DCF)<br>☒ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | Income Maintenance Programs |
| **Geographic Service Area:** | Richland County |
| **Income Level(s) Analyzed:** | Select the income level you will use for the Potentially Eligible Population.<br>**Note:** If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts.<br>☒ **All income levels** ☐ **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 | 13411 | 100.00% | 5008 | 100.00% | 0.00 |
| **Breakdown by Race** | | | | | |
| White | 12941 | 96.5% | 4167 | 83.8% | -12.7 |
| | | | | | |
| Black or African American | 76 | 0.6% | 82 | 1.6% | 1 |
| American Indian or Alaska Native | 44 | 0.3% | 22 | 0.4% | 0.1 |
| Asian | 117 | 0.9% | 47 | 0.9% | 0 |
| Native Hawaiian or Pacific Islander | 1 | 0.0% | 6 | 0.1% | 0.1 |
| Other | 158 | 1.2% | 534 | 10.6% | 9.4 |
| More Than One Race | 74 | 0.6% | 0 | 0% | 0 |
| | | | | | |
| Subtotal, Non-White | 470 | 3.5% | 691 | 13.8% | 10.3 |
| | | | | | |
| Hispanic/Latino (Regardless of Race) | 205 | 1.5% | | % | |
| **Breakdown by Sex** | | | | | |
| Female | 6735 | 50.2% | 2653 | 52.9% | 2.7 |
| Male | 6676 | 49.8% | 2355 | 47% | -2.7 |
| | | | | | |
| Disabilities | 2103 | 15.7% | 885 | 17.6% | 1.9 |

[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:** | https://dcf.wisconsin.gov/dashboard/civilrights/crc |

| | |
|---|---|
| **Data Source(s) for Population Served:** | Richland County Health and Human Services. |

## 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]

Non-white, Other, and 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

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

The County is not collecting on "more than one race" also collecting "unknown" vs "other" Unknown is being used in the place of other. There is no collection model for other on this worksheet.

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

No

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.)

Improve data colleciton of actual customers served.

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:

Denials have not contributed to a lower-than-expected participation of a particular category.

[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.

# CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Health and Human Services- Richland County |
| **Funding Agency:** | ☒ Wisconsin Department of Children and Families (DCF)<br>☐ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | Kinship Care |
| **Geographic Service Area:** | Richland County |
| **Income Level(s) Analyzed:** | Select the income level you will use for the Potentially Eligible Population.<br>**Note:** If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts.<br>☒ **All income levels** ☐ **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 | 13411 | 100.00% | 14 | 100.00% | 0.00 |
| **Breakdown by Race** | | | | | |
| White | 12941 | 96.5% | 12 | 85.7% | -10.8 |
| | | | | | |
| Black or African American | 76 | 0.6% | 0 | 0% | -0.6 |
| American Indian or Alaska Native | 44 | 0.3% | 1 | 7.1% | 6.8 |
| Asian | 117 | 0.9% | 0 | 0% | -0.9 |
| Native Hawaiian or Pacific Islander | 1 | 0% | 1 | 7.1% | 7.1 |
| Other | 158 | 1.2% | 0 | 0% | -1.2 |
| More Than One Race | 74 | 0.6% | 0 | 0% | -0.6 |
| | | | | | |
| Subtotal, Non-White | 470 | 3.5% | 2 | 14.3% | 10.8 |
| | | | | | |
| Hispanic/Latino (Regardless of Race) | 205 | 1.5% | 0 | 0% | -1.5 |
| **Breakdown by Sex** | | | | | |
| Female | 6735 | 50.2% | 26 | 47.3% | -2.9 |
| Male | 6676 | 49.8% | 29 | 52.7% | 2.9 |
| | | | | | |
| Disabilities | 2103 | 15.7% | 34 | 62% | 46.3 |

[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:** | https://dcf.wisconsin.gov/dashboard/civilrights/crc "Population: Serving Adults" |

| | |
|---|---|
| **Data Source(s) for Population Served:** | Richland County Health and Human Services. |

## 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]

Non-White, Male, Disability

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.*

Female, White

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

Not all data points are collected.

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

No

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.)

Improve data collecton of actual customers served and outreach to undrepresented groups.

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:

Denials have not contributed to a lower-than-expected participation of a particular category.

[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.

# CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Health and Human Services- Richland County |
| **Funding Agency:** | ☒ Wisconsin Department of Children and Families (DCF)<br>☐ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | Promoting Safe and Stable Families |
| **Geographic Service Area:** | Richland County |
| **Income Level(s) Analyzed:** | Select the income level you will use for the Potentially Eligible Population.<br>**Note:** If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts.<br>☒ **All income levels** ☐ **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 | 3109 | 100.00% | 23 | 100.00% | 0.00 |
| **Breakdown by Race** | | | | | |
| White | 3023 | 97.2% | 20 | 87% | -10.2 |
| | | | | | |
| Black or African American | 1 | 0.0% | 3 | 13% | 13 |
| American Indian or Alaska Native | 0 | 0% | 0 | 0% | 0 |
| Asian | 4 | 0.1% | 0 | 0% | -0.1 |
| Native Hawaiian or Pacific Islander | 0 | 0% | 0 | 0% | 0 |
| Other | 81 | 2.6% | 0 | 0% | -2.6 |
| More Than One Race | 0 | 0% | 0 | 0% | 0.0 |
| | | | | | |
| Subtotal, Non-White | 86 | 2.8% | 3 | 13% | 10.2 |
| | | | | | |
| Hispanic/Latino (Regardless of Race) | 71 | 2.3% | 1 | 4.3% | 2.0 |
| **Breakdown by Sex** | | | | | |
| Female | 1683 | 54.1% | 5 | 22% | -32.1 |
| Male | 1426 | 45.9% | 18 | 78% | 32.1 |
| | | | | | |
| Disabilities | 488 | 15.7% | 0 | 0% | -15.7 |

[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:** | https://dcf.wisconsin.gov/dashboard/civilrights/crc "Population: Families with Children" |

| | |
|---|---|
| **Data Source(s) for Population Served:** | Richland County Health and Human Services. |

## 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]

Non-White, 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, Other, Female, Disabled.

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

Data is not correctly or adaquately collected.

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

No

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.)

Improve data collecton of actual customers served.

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:

Denials have not contributed to a lower-than-expected participation of a particular category.

[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.

# CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Child Support - Richland County |
| **Funding Agency:** | ☒ Wisconsin Department of Children and Families (DCF)<br>☐ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | Child Support |
| **Geographic Service Area:** | Richland County |
| **Income Level(s) Analyzed:** | Select the income level you will use for the Potentially Eligible Population.<br>**Note:** If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts.<br>☒ **All income levels** ☐ **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 | 3,109 | 100.00% | 2353 | 100.00% | 0.00 |
| **Breakdown by Race** | | | | | |
| White | 3,023 | 97.2%% | 1799 | 76.46% | -20.74 |
| | | | | | |
| Black or African American | 1 | 0.0% | 37 | 1.57% | 1.57 |
| American Indian or Alaska Native | 0 | 0.0% | 12 | 0.51% | 0.51 |
| Asian | 4 | 0.1% | 7 | 0.30% | 0.29 |
| Native Hawaiian or Pacific Islander | 0 | 0.0% | 4 | 0.17% | 0.17 |
| Other | 81 | 2.6% | | % | -2.6 |
| More Than One Race | 0 | 0.0% | 13 | 0.55% | 0.55 |
| | | | | | |
| Subtotal, Non-White | 86 | 2.8% | 137 | 5.8% | 3.0 |
| | | | | | |
| Hispanic/Latino (Regardless of Race) | 71 | 2.3% | 52 | 2.21% | -0.09 |
| **Breakdown by Sex** | | | | | |
| Female | 1683 | 54.1% | 1124 | 48% | -6.1 |
| Male | 1426 | 45.9% | 1229 | 52% | 6.1 |
| | | | | | |
| Disabilities | 488 | 15.7% | 122 | 5.2% | -10.5 |

[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:** | Wisconsin Department of Children and Families, Civil Rights Compliance (CRC) Census Data Dashboard, Potentially Eligible Populations for Programs Serving Families with Children, Richland County. https://dcf.wisconsin.gov/dashboard/civilrights/crc |

| | |
|---|---|
| **Data Source(s) for Population Served:** | State of Wisconsin Department of Workforce Development Bureau of Child Support. Civil Rights Compliance County Caseload Partipant Counts Annual for Calendar Year 2021. |

## 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]

Male, 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, Other, Female, Disabled.

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

The non-white population in Richland County makes up less than 3% of the population. This means any representation of these populations in customers served creates issues with over and under representation.

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

Results indicate that potentially eligible populations are 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.)

Outreach to populations identified as under-served through other service programs. Ensuring "other" is a data set being collected for customers.

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:

Denials have not contributed to a lower-than-expected participation of a particular category.

[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.

# CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Health and Human Services- Richland County |
| **Funding Agency:** | ☐ Wisconsin Department of Children and Families (DCF)<br>☒ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | Community Mental Health Programs |
| **Geographic Service Area:** | Richland County |
| **Income Level(s) Analyzed:** | Select the income level you will use for the Potentially Eligible Population.<br>**Note:** If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts.<br>☒ **All income levels** ☐ **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 | 13411 | 100.00% | 55 | 100.00% | 0.00 |
| **Breakdown by Race** | | | | | |
| White | 12941 | 96.5% | 45 | 81.8% | -14.7 |
| | | | | | |
| Black or African American | 76 | 0.6% | 8 | 14.5% | 13.9 |
| American Indian or Alaska Native | 44 | 0.3% | 0 | 0% | -0.3 |
| Asian | 117 | 0.9% | 0 | 0% | -0.9 |
| Native Hawaiian or Pacific Islander | 1 | 0% | 2 | 3.6% | 3.6 |
| Other | 158 | 1.2% | 0 | 0% | -1.2 |
| More Than One Race | 74 | 0.6% | 0 | 0% | -0.6 |
| | | | | | |
| Subtotal, Non-White | 470 | 3.5% | 10 | 18.2% | 14.7 |
| | | | | | |
| Hispanic/Latino (Regardless of Race) | 205 | 1.5% | 2 | 3.6% | 2.1 |
| **Breakdown by Sex** | | | | | |
| Female | 6735 | 50.2% | 26 | 47% | -3.2 |
| Male | 6676 | 49.8% | 29 | 53% | 3.2 |
| | | | | | |
| Disabilities | 2103 | 15.7% | 34 | 62% | 46.3 |

[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:** | https://dcf.wisconsin.gov/dashboard/civilrights/crc "Population: Serving Adults" |

| | |
|---|---|
| **Data Source(s) for Population Served:** | Richland County Health and Human Services. |

## 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. Non-White, Male, Hispanic, 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.*

Female, White

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

Unknown.

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

No

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.)

Improve data collecton of actual customers served.

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:

Denials have not contributed to a lower-than-expected participation of a particular category.

[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.

# CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Health and Human Services- Richland County |
| **Funding Agency:** | ☐ Wisconsin Department of Children and Families (DCF)<br>☒ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | Mental Health and Substance Abuse Block Grants |
| **Geographic Service Area:** | Richland County |
| **Income Level(s) Analyzed:** | Select the income level you will use for the Potentially Eligible Population.<br>**Note:** If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts.<br>☒ **All income levels** ☐ **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 | 13411 | 100.00% | 261 | 100.00% | 0.00 |
| **Breakdown by Race** | | | | | |
| White | 12941 | 96.5% | 255 | 97.7% | 1.2 |
| | | | | | |
| Black or African American | 76 | 0.6% | 4 | 1.6% | 1.0 |
| American Indian or Alaska Native | 44 | 0.3% | 0 | 0% | -0.3 |
| Asian | 117 | 0.9% | 1 | 0.3% | -0.6 |
| Native Hawaiian or Pacific Islander | 1 | 0% | 1 | 0.3% | 0.3 |
| Other | 158 | 1.2% | 0 | 0% | -1.2 |
| More Than One Race | 74 | 0.6% | 0 | 0% | -0.6 |
| | | | | | |
| Subtotal, Non-White | 470 | 3.5% | 6 | 2.3% | -1.2 |
| | | | | | |
| Hispanic/Latino (Regardless of Race) | 205 | 1.5% | 7 | 2.9% | 1.4 |
| **Breakdown by Sex** | | | | | |
| Female | 6735 | 50.2% | 106 | 40.6% | -9.6 |
| Male | 6676 | 49.8% | 155 | 59.4% | 9.6 |
| | | | | | |
| Disabilities | 2103 | 15.7% | 65 | 24.9% | 9.2 |

[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:** | https://dcf.wisconsin.gov/dashboard/civilrights/crc "Population: Serving Adults" |

| | |
|---|---|
| **Data Source(s) for Population Served:** | Richland County Health and Human Services. |

## 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]

Male, 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.*

Female

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

Low population skews the data.

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

No

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.)

Improve data collecton of actual customers served. Additional outreach to under-represented population may be needed.

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:

Denials have not contributed to a lower-than-expected participation of a particular category.

[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.

# CUSTOMER SERVICE POPULATION ANALYSIS (CSPA) DATA CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Health and Human Services- Richland County |
| **Funding Agency:** | ☒ Wisconsin Department of Children and Families (DCF)<br>☐ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | Youth Aids and Youth Justice |
| **Geographic Service Area:** | Richland County |
| **Income Level(s) Analyzed:** | Select the income level you will use for the Potentially Eligible Population.<br>**Note:** If you would like to conduct the analysis for BOTH "All income levels" AND "Income below poverty level," complete TWO data charts.<br>☒ **All income levels** ☐ **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 | 3109 | 100.00% | 14 | 100.00% | 0.00 |
| **Breakdown by Race** | | | | | |
| White | 3023 | 97.2% | 9 | 64% | -33.2 |
| | | | | | |
| Black or African American | 1 | 0.0% | 2 | 14% | 14 |
| American Indian or Alaska Native | 0 | 0% | 0 | 0% | 0 |
| Asian | 4 | 0.1% | 0 | 0% | -0.1 |
| Native Hawaiian or Pacific Islander | 0 | 0% | 1 | 7% | 7 |
| Other | 81 | 2.6% | 2 | 14% | 11.4 |
| More Than One Race | 0 | 0% | 0 | 0% | 0.0 |
| | | | | | |
| Subtotal, Non-White | 86 | 2.8% | 5 | 36% | 33.2 |
| | | | | | |
| Hispanic/Latino (Regardless of Race) | 71 | 2.3% | | % | |
| **Breakdown by Sex** | | | | | |
| Female | 1683 | 54.1% | 2 | 14% | -40.1 |
| Male | 1426 | 45.9% | 12 | 86% | 40.1 |
| | | | | | |
| Disabilities | 488 | 15.7% | 0 | 0% | -15.7 |

[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:** | https://dcf.wisconsin.gov/dashboard/civilrights/crc "Population: Families with Children" |

| | |
|---|---|
| **Data Source(s) for Population Served:** | Richland County Health and Human Services. |

## 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]

Non-White, Male, Other

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, Female, Disabled.

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

Data is not correctly or adaquately collected.

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

No

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.)

Improve data collecton of actual customers served.

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:

Denials have not contributed to a lower-than-expected participation of a particular category.

[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.

# Appendix C: Limited English Proficiency Customer Data Analysis by Program

# LIMITED ENGLISH PROFICIENCY (LEP) CUSTOMER DATA ANALYSIS CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Child Support - Richland County |
| **Funding Agency:** | ☒ Wisconsin Department of Children and Families (DCF)<br>☐ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | Child Support |
| **Geographic Service Area:** | Richland 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.<br>☒ **All income levels** ☐ **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 or Program Year (Specify Year: 2021) | Safe Harbor | |
|---|---|---|---|---|---|
| | | | | 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]** | **(b) Number LEP Potentially Eligible in This Language Group** | **(c) Percentage LEP Potentially Eligible in This Language Group[2]** | | **Column (b) is 1,000 or more OR Column (c) is 5% or more?** | **Column (b) is less than 50 AND Column (c) is 5% or more?** |
| Spanish | 58 | 1.9% | 7 | ☐ yes | ☐ yes |
| Hmong/Laotian[3] | 2 | 0.1% | 0 | ☐ yes | ☐ yes |
| Chinese | 16 | 0.5% | 0 | ☐ yes | ☐ yes |
| Korean | 3 | 0.1% | 0 | ☐ yes | ☐ yes |
| Vietnamese | 1 | 0.0% | 0 | ☐ yes | ☐ yes |
| Tagalog | 3 | 0.1% | 0 | ☐ yes | ☐ yes |
| German/Germanic[4] | 63 | 2.0% | 0 | ☐ yes | ☐ yes |
| Russian/Polish/Other Slavic[5] | 4 | 0.1% | 0 | ☐ yes | ☐ yes |
| French/Patois/Haitian/Creole/Cajun | 6 | 0.2% | 0 | ☐ yes | ☐ yes |
| Arabic | 0 | 0.0% | 0 | ☐ yes | ☐ yes |
| Other – Specify: | 4 | 0.1% | 0 | ☐ yes | ☐ 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.

| | |
|---|---|
| **Data Source(s) for LEP Potentially Eligible Population:** | Wisconsin Department of Children and Families, Civil Rights Compliance (CRC) Census Data Dashboard, Potentially Eligible Populations for Programs Serving Families with Children, Richland County. https://dcf.wisconsin.gov/dashboard/civilrights/crc |

| | |
|---|---|
| **Data Source(s) for Number LEP Served:** | State of Wisconsin Department of Workforce Development Bureau of Child Support. Participants that have an LEP indicator. |

**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/Laotian, Chinese, Korean, Vietnamese, Tagalog, Germanic, Russian/Polish/Slavic, and French/Patois/Hatian/Creole/Cajun |
| Do you believe the data indicate potentially eligible LEP participants are or are not being served? |
| The data indicates that the potenially eligible LEP participants are being served. |
| What factors may be contributing to potentially eligible LEP participants not being served?[6] |
| unknown |
| What actions are being taken or can be taken to improve program participation and encourage enrollment of LEP populations that are under-served? |
| Additional marketing efforts in LEP populations |
| 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: |

[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.

# LIMITED ENGLISH PROFICIENCY (LEP) CUSTOMER DATA ANALYSIS CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Emergency Management and Services - Richland County |
| **Funding Agency:** | ☒ Wisconsin Department of Children and Families (DCF)<br>☐ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | EMS Training |
| **Geographic Service Area:** | Richland 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.<br>☒ **All income levels** ☐ **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 or Program Year (Specify Year: 2021) | Safe Harbor | |
|---|---|---|---|---|---|
| | | | | 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]** | **(b) Number LEP Potentially Eligible in This Language Group** | **(c) Percentage LEP Potentially Eligible in This Language Group[2]** | | **Column (b) is 1,000 or more OR Column (c) is 5% or more?** | **Column (b) is less than 50 AND Column (c) is 5% or more?** |
| Spanish | 58 | 1.9% | 0 | ☐ yes | ☐ yes |
| Hmong/Laotian[3] | 2 | 0.1% | 0 | ☐ yes | ☐ yes |
| Chinese | 16 | 0.5% | 0 | ☐ yes | ☐ yes |
| Korean | 3 | 0.1% | 0 | ☐ yes | ☐ yes |
| Vietnamese | 1 | 0.0% | 0 | ☐ yes | ☐ yes |
| Tagalog | 3 | 0.1% | 0 | ☐ yes | ☐ yes |
| German/Germanic[4] | 63 | 2.0% | 0 | ☐ yes | ☐ yes |
| Russian/Polish/Other Slavic[5] | 4 | 0.1% | 0 | ☐ yes | ☐ yes |
| French/Patois/Haitian/Creole/Cajun | 6 | 0.2% | 0 | ☐ yes | ☐ yes |
| Arabic | 0 | 0.0% | 0 | ☐ yes | ☐ yes |
| Other – Specify: | 4 | 0.1% | 0 | ☐ yes | ☐ 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.

| | |
|---|---|
| **Data Source(s) for LEP Potentially Eligible Population:** | Wisconsin Department of Children and Families, Civil Rights Compliance (CRC) Census Data Dashboard, Potentially Eligible Populations for Programs Serving Families with Children, Richland County. https://dcf.wisconsin.gov/dashboard/civilrights/crc |

| | |
|---|---|
| **Data Source(s) for Number LEP Served:** | State of Wisconsin Department of Workforce Development Bureau of Child Support. Participants that have an LEP indicator. |

**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/Laotian, Chinese, Korean, Vietnamese, Tagalog, Germanic, Russian/Polish/Slavic, and French/Patois/Hatian/Creole/Cajun |
| Do you believe the data indicate potentially eligible LEP participants are or are not being served? |
| The data indicates that the potenially eligible LEP participants are being served. |
| What factors may be contributing to potentially eligible LEP participants not being served?[6] |
| unknown |
| What actions are being taken or can be taken to improve program participation and encourage enrollment of LEP populations that are under-served? |
| Additional marketing efforts in LEP populations |
| 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: |

[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.

# LIMITED ENGLISH PROFICIENCY (LEP) CUSTOMER DATA ANALYSIS CHART

| | |
|---|---|
| **Local Agency/Recipient Name:** | Department of Health and Human Services - Richland County |
| **Funding Agency:** | ☐ Wisconsin Department of Children and Families (DCF)<br>☒ Wisconsin Department of Health Services (DHS) |
| **Program or Activity:** | All Richland Counth DHS PROGRAMS |
| **Geographic Service Area:** | Richland 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.<br>☒ **All income levels** ☐ **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 or Program Year (Specify Year: 2021) | Safe Harbor | |
|---|---|---|---|---|---|
| | | | | 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]** | **(b) Number LEP Potentially Eligible in This Language Group** | **(c) Percentage LEP Potentially Eligible in This Language Group[2]** | | **Column (b) is 1,000 or more OR Column (c) is 5% or more?** | **Column (b) is less than 50 AND Column (c) is 5% or more?** |
| Spanish | 58 | 1.9% | 0 | ☐ yes | ☐ yes |
| Hmong/Laotian[3] | 2 | 0.1% | 0 | ☐ yes | ☐ yes |
| Chinese | 16 | 0.5% | 0 | ☐ yes | ☐ yes |
| Korean | 3 | 0.1% | 0 | ☐ yes | ☐ yes |
| Vietnamese | 1 | 0.0% | 0 | ☐ yes | ☐ yes |
| Tagalog | 3 | 0.1% | 0 | ☐ yes | ☐ yes |
| German/Germanic[4] | 63 | 2.0% | 0 | ☐ yes | ☐ yes |
| Russian/Polish/Other Slavic[5] | 4 | 0.1% | 0 | ☐ yes | ☐ yes |
| French/Patois/Haitian/Creole/Cajun | 6 | 0.2% | 0 | ☐ yes | ☐ yes |
| Arabic | 0 | 0.0% | 0 | ☐ yes | ☐ yes |
| Other – Specify: | 4 | 0.1% | 0 | ☐ yes | ☐ 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.

| | |
|---|---|
| **Data Source(s) for LEP Potentially Eligible Population:** | Wisconsin Department of Children and Families, Civil Rights Compliance (CRC) Census Data Dashboard, Potentially Eligible Populations for Programs Serving Families with Children, Richland County. https://dcf.wisconsin.gov/dashboard/civilrights/crc |

| | |
|---|---|
| **Data Source(s) for Number LEP Served:** | Richland County Department of Health and Human Services |

**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/Laotian, Chinese, Korean, Vietnamese, Tagalog, Germanic, Russian/Polish/Slavic, and French/Patois/Hatian/Creole/Cajun |
| Do you believe the data indicate potentially eligible LEP participants are or are not being served? |
| The data indicates that the potenially eligible LEP participants are being served. |
| What factors may be contributing to potentially eligible LEP participants not being served?[6] |
| unknown |
| What actions are being taken or can be taken to improve program participation and encourage enrollment of LEP populations that are under-served? |
| The Department of Health and Human Services did not provide data on the language groups of the LEP customers served. The following number of customers were served in each program: 88 - Income Maintenance Programs, 1 - Birth to 3, 1- Childres Long Term Support waver, 1- Childres Community Options Program, 3 - Mental Health and Substance Abuse Block Grants. The Plan identifies that language groups will need to be collected going forward in order to provide meaningful access and comply with civil rights requirements. |

[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.

| 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: |
| --- |
| |

# Appendix D: Nondiscrimination Statements.

**USHHS Nondiscrimination Statement for Health Care Related Programs**

Richland County complies with applicable Federal civil rights laws and does not discriminate, exclude or treat people differently on the basis of race, color, national origin, age, disability, sex, religion, political beliefs, sexual orientation, or filing of a prior civil rights complaint. Richland County:

- Provides free aids and services to people with disabilities to communicate effectively with us, such as:
  - o Qualified sign language interpreters
  - o Written information in other formats (large print, audio, accessible electronic formats, other formats)
- Provides free language services to people whose primary language is not English, such as: o Qualified interpreters
  - o Information written in other languages

If you need these services, contact:
**Clinton Langreck , County Administrator**
**181 West Seminary St.**
**Richland Center, WI 53581**
**608-649-5960**
**Clinton.langreck@co.richland.wi.us**

FILING A GRIEVANCE
If you believe that Richland County has failed to provide these services or has otherwise discriminated against you on the basis of race, color, national origin, age, disability, sex, religion, political beliefs, sexual orientation, or filing of a prior civil rights complaint, please contact the County Administrator at:
**Clinton Langreck , County Administrator**
**181 West Seminary St.**
**Richland Center, WI 53581**
**608-649-5960**
**Clinton.langreck@co.richland.wi.us**

You can also file a civil rights complaint with the U.S. Department of Health and Human Services, Office for Civil Rights, electronically through the OCR Complaint Portal, available at https://ocrportal.hhs.gov/ocr/portal/lobby.jsf, or:
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Room 509F, HHH Building
Washington, D.C. 20201
800-368-1019 (Voice), 800-537-7697 (TTY)
OCRComplaint@hhs.gov, https://www.hhs.gov/civil-rights

**USDA Nondiscrimination Statement for SNAP and FDPIR**

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the agency (state or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

FILING A GRIEVANCE
If you believe that Richland County has failed to provide these services or has otherwise discriminated against you on the basis of race, color, national origin, sex, religious creed, disability, age, political beliefs, or filing of a prior civil rights complaint, please contact the County Administrator at:
**Clinton Langreck , County Administrator**
**181 West Seminary St.**
**Richland Center, WI 53581**
**608-649-5960**
**Clinton.langreck@co.richland.wi.us**

To file a program complaint of discrimination with the U.S. Department of Agriculture, complete the USDA Program Discrimination Complaint Form (AD-3027) (https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf), found online at: How to File a Program Discrimination Complaint (https://www.usda.gov/oascr/how-to-file-a-program-discrimination-complaint) and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

1. mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410;

2. fax: (202) 690-7442; or

3. email: program.intake@usda.gov

**USDA Nondiscrimination Statement for all other FNS Nutrition Assistance Programs**

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the agency (state or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

FILING A GRIEVANCE
If you believe that **[Name of Covered Entity]** has failed to provide these services or has otherwise discriminated against you on the basis of race, color, national origin, sex, disability, age, or filing of a prior civil rights complaint, please contact the County Administrator at:
**Clint Langreck , County Administrator**
**181 West Seminary St.**
**Richland Center, WI 53581**
**608-649-5960**
**Clinton.langreck@co.richland.wi.us**

To file a program complaint of discrimination with the U.S. Department of Agriculture, complete the USDA Program Discrimination Complaint Form (AD-3027) found online at: How to File a Complaint (https://www.usda.gov/oascr/how-to-file-a-program-discrimination-complaint), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

1. mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410;

2. fax: (202) 690-7442; or

3. email: program.intake@usda.gov

# Appendix E: LEP Policy Statement, and Acknowledgement and Refusal of Free Interpretation Services Form

**LIMITED ENGLISH PROFICIENCY POLICY STATEMENT**

Richland County (the entity) is committed to providing equal opportunity in all programs, services, and activities to individuals who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English. Those individuals are referred to as limited English proficient, or "LEP." Meaningful access to Federally funded programs and activities is required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Meaningful access to LEP individuals is provided in two ways: oral interpretation and written translation. Oral interpretation can range from on-site interpreters for critical services provided to a high volume of LEP persons, to access through commercially available telephonic interpretation services. Written translation can range from translation of an entire document to translation of a short description of the document.

The entity fulfills this obligation by one or more of the following: hiring bilingual staff, hiring staff interpreters/translators, contracting for interpreters/translation services, using telephone interpreter lines, and/or using community volunteers. The entity understands that the interpretation/translation must be performed in a competent, confidential, ethical, and accurate manner at no cost to the LEP individual. The entity does not rely on the LEP individual to provide an interpreter.

If an LEP person requests to use a family member, friend or other adult as an interpreter, the entity makes the LEP person aware that the entity will provide a qualified interpreter at no cost to the LEP person. The entity respects the LEP person's choice of interpreters. If the LEP person chooses a family member, friend, or other adult to interpret instead of one provided by the entity, the entity makes a record of that decision. If the entity believes the interpreter selected by the LEP person is not competent or appropriate, the entity supplements with its own qualified interpreter. Minors should not act as interpreters unless there is an emergency situation and another interpreter is not immediately available.

The entity records the number and date of instances in which interpretation was offered, what service was offered (e.g., staff, in-person contracted, telephone, etc.), whether it was accepted or whether the LEP individual selected their own interpreter, and in what language group the service was needed.

This entity monitors its changing demographics and population trends on an annual basis, to ensure awareness of the language needs in its service area.

The entity requires its subrecipients to comply with the LEP policies requirements.

To assist us in complying with all applicable limited English proficiency rules, regulations, and guidelines, the LEP Coordinator is:

Clinton Langreck, 608-649-5960

LEP customers are encouraged to ask for language assistance or discuss any perceived discrimination problems with him/her. Information about discrimination complaint resolution process is available upon request.

**Acknowledgement and Refusal of Free Interpretation Services (Recipient/Subrecipient):**

Richland County, Wisconsin has offered you free interpretation services provided by a skilled and qualified interpreter who is trained to protect your privacy. That person understands your language and technical/legal words related to the program or service you are seeking or receiving.

You have the right to the free interpreter services described above. You also have the right to refuse that service and proceed with your own interpreter. YOU ARE NOT REQUIRED TO PROVIDE YOUR OWN INTERPRETER. If you choose to utilize your own interpreter, whether a family member or another person, that person may not have formal training and may commit the following errors, among others:

- Give you or your service provider incorrect information;
- Add or leave out information;
- Learn information about you that you may not wish to be known;
- Tell other people information about you that would otherwise be private;
- Misunderstand your case manager, case worker, doctor, caregiver, or service provider.

(Recipient/Subrecipient) _____ has explained to me, in my own language, the risks of refusing the offered trained interpreter. I understand these risks and choose to decline the interpretation services offered at no cost.

_____ _____

Client Signature Date

_____ _____

Recipient Signature Date

_____ _____

Interpreter Signature Date

If interpreted by phone, interpreter name and #: _____

Explanation of Document (for providers and staff):

_____

_____

# Appendix F: Model Service Delivery Discrimination Complaint Form

If you need help completing this form please contact: Clinton Langreck, 608-649-5960

Name of Complainant_____ Phone_____

Address (number, street, city, state, zip code)_____

Federal civil rights laws prohibit discrimination of MEMBERS, APPLICANTS, ENROLLEES, AND BENFICIARIES in any programs and activities that receive Federal financial assistance and that are run by State Agencies (DHS/DCF) directly or by their partners, local agencies, and contractors. Those laws 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 for opposing discrimination. If you were wrongfully denied services, or if the treatment you received was separate or different than others received, or if the program was not accessible to you, and you believe is was because of one or more of those protected bases, it may be discrimination. The precise nondiscrimination requirements depend on which Federal agency funds the program or activity.

Name of the Agency/Organization/Entity against whom the complaint is filed.

Name of the Federal program you were discriminated in by the agency/organization (e.g., BadgerCare, FoodShare, Child Protective Services, etc.)

Describe the action or treatment that you think was discriminatory. Include information about who, what, when, where, how, why, and the names, addresses and phone numbers of any witnesses, if you know them. Please be specific about the date of the last incident. You may write this on another sheet of paper if you need more room. In the space below, please say how many pages are attached, if you need to add pages.

Description of the relief or remedy you want:

_____ _____

SIGNATURE - Complainant or Complainant Representative Date Signed

The information below is to be completed by the person at the entity who receives your complaint and investigates it.

Date Received :_____

Received By_____ Title _____Agency_____

Actions and Individual(s) to be investigated:

Findings (Must be completed within 90 days):

Action Taken:

Further Action Required? Yes No

If yes, what action is recommended?

**File formal discrimination complaints about these services with the state agency listed below.**

| PROGRAM | STATE AGENCY |
|---|---|
| Wisconsin (WI) Works (W-2), , Temporary Assistance to Needy Families (TANF), Brighter Futures Initiative, Child Support, Early Care and Education, Child Care and Day Care Certification Programs, Child Welfare, Milwaukee Child Protective Services Programs, Emergency Assistance, Families and Economic Security, Job Access Loans, Adoption and Foster Care Programs, Safety and Permanence Programs (Out-of-Home Care, Safety and Well Being, Program Integrity), Child Placement Services, Child Abuse and Neglect, Protective Services, Kinship Care, Domestic Abuse/Domestic Violence Programs, Refugee Assistance and Services, Youth Justice services and other programs administered by the WI Department of Children and Families., Refugee Cash and Medical Assistance) | WI Department of Children and Families<br>201 W. Washington Ave, Second Floor<br>P.O. Box 8916<br>Madison, WI 53708-8916<br>Voice: 608-422-6889<br>TTY: 800-864-4585 |
| Medical Assistance Services, Medicaid, BadgerCare Plus, FoodShare, TEFAP, SeniorCare, Family Care, Public Health Services, WIC (Women, Infants and Children), and other programs administered by the WI Department of Health Services. | WI Department of Health Services<br>Civil Rights Compliance Office<br>1 W. Wilson, Room 651<br>P.O. Box 7850<br>Madison, WI 53707-7850<br>608-266-1258 (Voice); 608-267-1434 (Fax) 711 or 1-800-947-3529 (TTY)<br>Email:DHSCRC@dhs.wisconsin.gov |
| **You also have the right to file a formal complaint with a Federal agency listed below.** | |
| PROGRAM | FEDERAL AGENCY |
| HHS program or activity | Office for Civil Rights U.S. Department of Health and Human Services<br>200 Independence Avenue, SW<br>Room 509F, HHH Building<br>Washington D.C. 20201<br>800-368-1019 800-537-7697 (TDD)<br>https://ocrportal.hhs.gov/ocr/smartscreen/main.jsf (On-line complaint portal) |
| UDSA-FNS program or activity | U.S. Department of Agriculture, Director, Office of Adjudication<br>1400 Independence Avenue, SW<br>Washington, D.C. 20250-9410 (<br>866) 632-9992 800-877-8339 (Federal Relay Services) 866-377-8642 (Relay voice users) 800-845-6136 (Spanish)<br>Cr-info@ascr.usda.gov |