

## CIVIL RIGHTS REVIEW TOOL

AGENCY:  
DATE  
REVIEWER:

ADMINISTRATOR:  
PARTICIPANTS:

Criteria for Compliance	Compliance Met		Comments / Documentation / Explanation / Timelines
	Yes	No	
<b>I. NON-DISCRIMINATION POLICIES AND NOTICES:</b>			<b>Citation:</b> Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1975 (45 CFR §§ 80.6(d), 84.8, and 91.32) <a href="http://www.hhs.gov/ocr/nondiscrimpol.html">http://www.hhs.gov/ocr/nondiscrimpol.html</a>
<p>A. There is a written policy for non-discrimination on the basis of race, color, national origin, disability, and age.</p> <p>B. Nondiscrimination policies are effectively communicated to employees and volunteers, clients, the community, and others.</p> <p><input type="checkbox"/> signage in facility <input type="checkbox"/> website <input checked="" type="checkbox"/> printed material publicizing program(s) <input checked="" type="checkbox"/> other method(s) _____</p> <p>C. Methods are described for conveying information to persons with sensory impairment or low English proficiency (LEP).</p>			
<b>II. COMMUNICATION WITH PERSONS WHO ARE LOW ENGLISH PROFICIENT (LEP):</b>			<b>Citation:</b> Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (45 CFR §80.3(b)(2)); <a href="http://www.lep.gov">http://www.lep.gov</a>

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<p>A. Procedures are developed for effective communication with persons who are LEP, to include:</p> <ol style="list-style-type: none"> <li>1. How individuals with LEP and are in need of language assistance are identified.</li> <li>2. How LEP persons are informed that language assistance services are available.</li> <li>3. How language assistance measures are provided (for both oral and written communication) to persons with LEP, consistent with Title VI requirements.</li> </ol> <p>B. Copies of vital written materials are available for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less, of the population eligible to be served or likely to be affected or encountered. If there are fewer than 50 persons in a language group, the recipient does not translate vital written materials but provides written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.</p>			
<p><b>III. AUXILIARY AIDS AND SERVICES FOR PERSONS WITH DISABILITIES:</b></p>			<p><b>Citation:</b> Section 504 of the Rehabilitation Act of 1973: (45 CFR §84.52(d)); DHS 2005-06 Intergovernmental Agreement for the Financing of Public Health Services, Exhibit E; <a href="http://www.hhs.gov/ocr/auxaids.html">www.hhs.gov/ocr/auxaids.html</a></p>
<p>A. Procedures are developed for effective communication with individuals who are deaf, hearing impaired, blind, visually impaired or who have impaired sensory,</p>			

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<p>manual, or speaking skills, including:</p> <ol style="list-style-type: none"> <li>1. How such persons are identified and how it is determined whether interpreters or other assistive services are needed.</li> <li>2. Methods of providing interpreters and other services as necessary for effective communication.</li> <li>3. A list of available auxiliary aids and services, and how persons are informed that interpreters or other assistive aids are available at no cost.</li> <li>4. Procedures used to communicate with deaf or hearing impaired persons over the telephone, including TTY/TDD or access to the State Relay System (Include phone number).</li> <li>5. Procedures used to notify clients and potential clients about the existence and location of services and facilities that are accessible to persons with disabilities.</li> <li>6. Methods used to train client contact staff in effective ways to communicate with sensory-impaired persons.</li> </ol>			
<p><b>IV. REQUIREMENTS FOR FACILITIES WITH 15 OR MORE EMPLOYEES:</b></p>			<p><b>Citation:</b> Section 504 of the Rehabilitation Act of 1973: (45 CFR §84.7) ; DHS 2005-2006 Intergovernmental Agreement for the Financing of Public Health Services, Exhibit H;  <a href="http://www.hhs.gov/ocr/reqfacilities.html">www.hhs.gov/ocr/reqfacilities.html</a></p>

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<p>A. A responsible employee is designated to coordinate compliance with 45 CFR §84. List name, title and phone number of the Section 504 coordinator.</p> <p>B. There is a written policy for handling disability discrimination grievances filed by anyone (client or employee).</p> <p>C. Grievance procedures contain the minimum “due process” standards:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> An established process and time frame for filing a grievance.</li> <li><input type="checkbox"/> An established hearing and appeal process.</li> <li><input type="checkbox"/> Requirement for maintaining adequate records and confidentiality.</li> <li><input type="checkbox"/> A description of the options available for resolving disputes.</li> </ul> <p>D. Employees and governing board members are familiar with the civil rights compliance responsibilities:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Included in employee manual.</li> <li><input checked="" type="checkbox"/> Published in other materials for this purpose.</li> <li><input checked="" type="checkbox"/> Presented at staff and board meetings.</li> </ul>			
<b>V. ACCESSIBILITY:</b>			<p><b>Citation:</b> Title III of the Americans with Disabilities Act of 1990, as amended  <a href="http://www.adaptenv.org/documents/checklist-pdf.pdf">http://www.adaptenv.org/documents/checklist-pdf.pdf</a></p>
<p>A. Accessible approach and entrance:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> There is an entrance with route of travel that does not require stairs.</li> <li><input type="checkbox"/> All inaccessible entrances have signs</li> </ul>			

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<p>indicating the location of the nearest accessible entrance.</p> <p><input type="checkbox"/> Accessible entrance can be used independently.</p> <p><input type="checkbox"/> Curbs on the route have curb cuts at drives, parking, and drop-off.</p> <p><input type="checkbox"/> Accessible parking spaces are those closest to the accessible entrance.</p> <p><input type="checkbox"/> There is an enforcement procedure to ensure that accessible parking is used only by those who need it.</p> <p>B. Access to services:</p> <p><input type="checkbox"/> All public spaces are on an accessible route of travel.</p> <p><input type="checkbox"/> There are ramps, lifts, or elevators to all public levels.</p> <p><input type="checkbox"/> Emergency systems have both flashing lights and audible signals.</p> <p>C. Access to restrooms:</p> <p><input type="checkbox"/> At least one restroom is fully accessible (either one for each sex, or unisex).</p> <p><input type="checkbox"/> There are signs at inaccessible restrooms that give directions to accessible ones.</p> <p><input type="checkbox"/> There is tactile signage identifying restrooms.</p> <p><input type="checkbox"/> The faucet can be operated with closed fist.</p> <p><input type="checkbox"/> Soap and other dispensers are within reach range and usable with one closed fist.</p>			

Reviewed 12/08