

## Civil Rights Monitoring and Reviews

- I. Pre-Award Compliance Reviews. The State agency will perform thorough reviews of applicants from previously unfunded local agencies. This review will be based on information provided by applicants in their official application for program funds.
  - a. Those agencies whose applicants are determined incomplete shall be notified by the State Office within 15 days of receipt of the application. This notification will specify the additional information needed to complete the application.
  - b. The applicant shall then be notified of the approval or denial of his/her application within 30 days of receipt of the completed application.
  - c. On-site reviews to determine civil rights compliance shall be made if the State agency cannot determine compliance based on the information contained in the completed application. The review will include the following:
    - i. All past substantiated civil rights problems or noncompliance situations have been corrected.
    - ii. The local agency will operate within the procedures established by the State Agency.
    - iii. Clinic sites do not deny access to any persons because of his or her race, color, national origin, age, sex, or disability.
    - iv. Appropriate staff, volunteers or other translation resources are available in areas where a significant proportion of non-English or limited English- speaking persons reside.
    - v. Description of the racial/ethnic make-up of the service area is included in the application.
- II. Local Agency Reviews. When a review of agency is performed, the following items must be determined as a minimum:
  - a. Do all persons have an equal opportunity to participate in the program regardless of race, color, national origin, age, sex, or disability?
  - b. Is ethnicity and race documented for all participants?
  - c. Has the local agency conducted civil rights training for all staff?
  - d. Is the nondiscrimination poster displayed in the clinic?
  - e. Is program information being provided to applicants, participants, grassroots organization or similar minority groups?

- f. Is the nondiscrimination statement being included on all printed materials distributed to the public?
- g. Are civil rights complaints being handled according to policy?