

# Federal Civil Rights Non-Discrimination Requirements: HRSA Award Recipients

I'm competing for a federal award. What are my civil rights obligations once I receive an award?

Each HRSA Notice of Funding Opportunity states: "If you receive an award, you must follow all applicable nondiscrimination laws."

## What does that mean?

If you apply for and receive a HRSA grant award, you must comply with all relevant federal civil rights requirements. These are broken down below by topic area with the associated laws.

### Disability Access

Section 504 of the Rehabilitation Act

Section 1557 of the Affordable Care Act

Americans with Disabilities Act - Title II

- Ensure programs and services are accessible to patients with disabilities (e.g., patients who have visual impairments).
- Reasonably modify your organization's policies (e.g., allow use of service animal as exception to "no pets" policy) to ensure effective communication (e.g., sign language interpreters), and physical access to facilities.

### Language Access

Title VI of the Civil Rights Act

Section 1557 of the Affordable Care Act

- Take reasonable steps to provide meaningful access to programs and activities by patients who do not use English as their primary language (also known as language access).
- A patient with limited English proficiency (LEP) does not speak English as their primary language and has a limited ability to read, speak, write, or understand English.
- Patients may require qualified and certified language services, such as oral interpretation and written translation, to effectively participate in and benefit from the services provided.

### Sex-Based Discrim.

Section 1557 of the Affordable Care Act

Title IX of the Education Amendments

- Do not discriminate based on a patient's sex, which includes sexual harassment, sex-based stereotyping, pregnancy, sexual orientation, and gender identity.

### Race-Based Discrim.

Section 1557 of the Affordable Care Act

Title VI of the Civil Rights Act

- Do not discriminate based on a patient's race or the color of their skin.
- Do not (1) provide a different service or benefit, nor (2) segregate based on a patient's race or the color of their skin.

### Age-Based Discrim.

Age Discrimination Act

Section 1557 of the Affordable Care Act

- Do not exclude, limit, or deny services to a patient based on age.
- Four exceptions to this requirement (see [link](#)).

### Conscience & Religious Freedom Protections

Section 1557 of the Affordable Care Act

Title VI of the Civil Rights Act

- Do not discriminate or harass patients based on actual or perceived: (1) shared ancestry or ethnic characteristics; or (2) citizenship or residency in a country with a dominant religion or distinct religious identity.
- This includes patients who are or are perceived to be Jewish, Christian, Muslim, Sikh, Hindu, or Buddhist, or of another religious group (e.g., having a name or wearing attire associated with a certain religion).

## OCRDI Services

HRSA's Office of Civil Rights, Diversity, and Inclusion (OCRDI) offers 4 types of services to assist award recipients in complying with their federal civil rights obligations.

1



#### Technical Assistance

OCRDI offers tailored trainings and informational sessions on emerging civil rights and equity issues to clarify legal requirements and best practices for promoting inclusive and nondiscriminatory services.

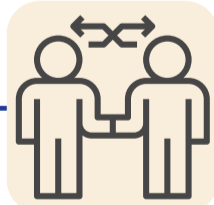
2



#### Consultations

OCRDI provides 1-on-1 consultations, offering courtesy reviews of civil rights policies and procedures, to help identify potential compliance issues and recommend necessary adjustments to promote civil rights compliance.

3



#### Collaborative Efforts

OCRDI engages in substantive efforts across HRSA and the Department, such as through federal workgroups, to address and share best practices regarding cross-cutting civil rights and health equity topics.

4



#### Informational Resources

OCRDI develops short informational resources that plainly explain complex civil rights topics to help guide HRSA award recipients in understanding and applying these nuanced requirements (available on [HRSA OCRDI's webpage](#)).

### Contact Us!

If you have questions about your federal civil rights requirements, reach out to us.

Phone: 301-443-5636

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