

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.

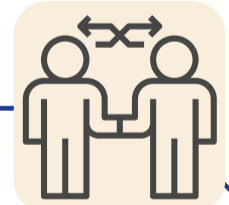
2



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

Email: HRSACivilRights@hrsa.gov

