




Douglas County Department of Human Services

Policy Name	Civil Rights Plan
Supersedes	10.1.22
Effective Date	2.21.23
Director's/Designee's Approval & Date	 2/22/23

A. Plan Statement

1. The Department provides services and benefits to individuals and families. This plan and the corresponding procedure comply with applicable federal rules that address individuals covered under these laws:
 - i. Title VI of the Civil Rights Act of 1964,
 - ii. Section 504 of the Rehabilitation Act of 1973,
 - iii. Title II of the Americans with Disabilities Act of 1990,
 - iv. the Age Discrimination Act of 1975,
 - v. Regulations of the U.S. Department of Health and Human Services issued pursuant to the above statutes at Title 45 Code of Federal Regulations (CFR) Parts 80, 84, and 91, and Title 28 CFR Part 35,
 - vi. Regulations of the U.S. Department of Agriculture nondiscrimination requirements,
 - vii. Colorado HB18-1104, and
 - viii. Affordable Care Act, Section 1557.
2. The Department does not exclude, deny benefits to, or otherwise discriminate against any person on the grounds of race, color, national origin, sex (including gender identity and sexual orientation), religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity in any program or activity in admission to, participation in, or receipt of the services and benefits under any of its programs and activities, whether carried out by the Department directly or through a contractor or any other entity with which the Department arranges to carry out its programs and activities. Refer to the corresponding procedure for information on the content and posting of the Department's nondiscrimination notice.
3. The Department will take appropriate steps to ensure that persons with disabilities, including persons who have hearing, vision, or speech disability, or who have limited English proficiency have an equal opportunity to apply for and participate in services, programs, and benefits. All necessary auxiliary aids and services shall be provided without cost to the person being served.



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B. Civil Rights Coordinator

1. The Department's Civil Rights Coordinator reports directly to the Department Director, and can be reached at 4400 Castleton Court, Castle Rock, CO 80109; 303-688-4825; FAX 877-285-8988
2. The Civil Rights Coordinator will work directly with interested persons and Human Services staff to ensure compliance with civil rights laws. All Human Services staff and contract partners are responsible for reporting to the Civil Rights Coordinator any potential problems regarding this policy and its corresponding procedure.

C. Notice – Full Text

1. The Department will ensure widely disseminated continuous notice pertaining to nondiscrimination and accommodations. Blind or persons with impaired vision will have the statement in Section 2 below read to them. Signage will be in English and Spanish. If needed, notice will be made in other languages. Notice may be provided verbally via an interpreter.
2. The following text will be included in the notice:

Notice of Nondiscrimination and Accessibility Requirements Discrimination is Against the Law

In accordance with federal civil rights laws 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 (including gender identity and sexual orientation), 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. Programs that receive federal financial assistance from the U.S. Department of Health and Human Services (HHS), such as Temporary Assistance for Needy Families (TANF), and programs HHS directly operates are also prohibited from discrimination under federal civil rights laws and HHS regulations.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotope, American Sign Language), should contact the agency (state or local) where they applied for benefits. Individuals who are deaf, hard of hearing or who 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.

The Douglas County Department of Human Services:

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



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English, such as:

- Qualified interpreters
- Information written in other languages

If you need these services, contact Tori Hofsheier at 303-814-5308 or vhofshei@douglas.co.us. If you believe that The Douglas County Department of Human Services has failed to provide these services or discriminated in another way you can file a grievance with:

Tori Hofsheier, Civil Rights Coordinator
4400 Castleton Court, Castle Rock, CO, 80109
Phone: 303-814-5308
Fax: 877-285-8988
vhofshei@douglas.co.us

You can file a grievance in person or by mail, fax, or email. If you need help filing a grievance, assistance can be provided. 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 Office for Civil Rights Complaint Portal, available at <https://ocrportal.hhs.gov/ocr/portal/lobby.jsf>, or by mail or phone at:

U.S. Department of Health and Human Services
200 Independence Avenue, SW
Room 509F, HHH Building
Washington, D.C. 20201
1-800-368-1019, 800-537-7697 (TDD)

Complaint forms are available at <http://www.hhs.gov/ocr/office/file/index.html>.

Colorado Civil Rights Division
Dora_ccrd@state.co.us

Office for Civil Rights, Region VIII
U.S. Department of Health and Human Services
1961 Stout Street, Room 08-148
Denver, Colorado 80294
Voice Phone (800) 368-1019
Facsimile (202) 619-3818
TDD (800) 537-7697
OCRMail@hhs.gov



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To file a federal SNAP or Food Assistance discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (833)-256-1665, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to:

Food and Nutrition Services, USDA
1320 Braddock Place, Room 334
Alexandria, VA 22314
Phone – 833-620-1071
Fax- 833-256-1665
Email- FNScivilrightscomplaints@usda.gov

D. Notice – Abbreviated Text

1. The Department will provide the nondiscrimination statement and tagline in English and the other top 10 languages as determined by a review of State, County, and Department data. The list will be reviewed periodically and updated as demographics change.
2. An abbreviated notice in English will be included on the Department's website under the Civil Rights section. The website is capable of translating the abbreviated notice to Arabic, Chinese (traditional), Korean, Persian, Russian, Spanish, and Vietnamese.
3. The following text will be used:

The Douglas County Department of Human Services complies with applicable Federal civil rights laws and does not discriminate based on race, color, national origin, sex (including gender identity and sexual orientation), religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity. Access to auxiliary aids and/or services will be provided in order to ensure access to services and programs provided under the Department. For assistance call 303-688-4825.

Spanish

El Departamento de Servicios Humanos del Condado de Douglas cumple con las leyes federales de derechos civiles aplicables y no discrimina por motivos de raza, color, origen nacional, sexo (incluida la identidad de género y la orientación sexual), credo religioso, discapacidad, edad, creencias políticas o represalias por historial de actividades de derechos civiles. Se proporcionará acceso a ayudas y/o servicios auxiliares para garantizar el acceso a los servicios y programas proporcionados por el Departamento. Para asistencia llame al 303-688-4825.



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Chinese

道格拉斯縣公共服務部遵守聯邦民權法，不因種族、膚色、國籍、性別（包括性別認同和性向）、宗教信仰、殘疾、年齡、政治信仰持有歧視或對先前的參與民權活動進行報復行為。我們將提供輔助工具和/或服務，以確保您獲得部門提供的服務和計劃。如需幫助，請致電 303-688-4825

Korean

더글러스 카운티 복지 서비스부(Douglas County Department of Human Services)는 적용 가능한 연방 민권법을 준수하며 인종, 피부색, 출신 국가, 성별(성 정체성 및 성적 취향 포함), 종교적 신념, 장애, 연령, 정치적 신념 또는 보복 또는 이전 민권 활동에 대한 보복을 이유로 차별하지 않습니다. 부서에서 제공하는 서비스 및 프로그램에 대한 이용 권한을 보장하기 위해 보조 지원 및/또는 서비스에 대한 이용 권한이 제공됩니다. 도움이 필요하시면 303-688-4825 로 전화하십시오.

Russian

Департамент социальных служб округа Дуглас соблюдает применимые федеральные законы о гражданских правах и не допускает дискриминации по признаку расы, цвета кожи, национального происхождения, пола (включая гендерную идентичность и сексуальную ориентацию), религиозных убеждений, инвалидности, возраста, политических убеждений или мести или возмездие за предыдущую гражданско-правовую деятельность. Доступ к вспомогательным средствам и/или услугам будет предоставляться для обеспечения доступа к услугам и программам, предоставляемым Департаментом. Для получения помощи звоните 303-688-4825.

Thai

กรมประชาสงเคราะห์ห่มมนุษย์อำเภอด้กลาสปฏิบัติตามกฎหมาย
ว่าด้วยสิทธิพลเมืองของรัฐบาลกลางที่บังคับใช้และไม่เลือกปฏิบัติตามเชื้อชาติ สีผิว ชาตีกำเนิด เพศ
(รวมถึงอัตลักษณ์ทางเพศและรสนิยมทางเพศ) ความเชื่อทางศาสนา ความพิการอายุ
ความเชื่อทางการเมือง หรือการตอบโต้ หรือการตอบโต้สำหรับกิจกรรมด้านสิทธิพลเมืองก่อนหน้านี้
การเข้าถึงความช่วยเหลือและ/หรือเข้าถึงบริการเสริมที่จะได้รับ
เพื่อให้สามารถเข้าถึงบริการและโปรแกรมที่มีให้ภายใต้กรม สำหรับความช่วยเหลือโทร 303-688-4825



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Vietnamese

Bộ Dịch vụ Nhân sinh của Quận Douglas tuân thủ luật dân quyền hiện hành của Liên bang và không phân biệt đối xử dựa trên chủng tộc, màu da, nguồn gốc quốc gia, giới tính (bao gồm cả bản dạng giới và khuynh hướng tình dục), tín ngưỡng, khuyết tật, tuổi tác, niềm tin chính trị hoặc sự trả thù hoặc trả thù cho hoạt động dân quyền trước đó. Việc tiếp cận các hỗ trợ và / hoặc dịch vụ phụ trợ sẽ được cung cấp để đảm bảo tiếp cận với các dịch vụ và chương trình do Bộ cung cấp. Để được hỗ trợ, hãy gọi 303-688-4825.

Amharic

የዳግላስ ካውንቲ የሰብአዊ አገልግሎት ዲፓርትመንት የሚመለከታቸው የፌዴራል ሲቪል መብቶች ህጎችን ያከብራል እና በዘር፣ ቀለም፣ ብሄራዊ ማንነት፣ ጾታ (የጾታ ማንነት እና ጾታዊ ዝንባሌን ጨምሮ)፣ ሀይማኖታዊ እምነት፣ የአካል ጉዳት፣ እድሜ፣ የፖለቲካ እምነት ወይም በቀል ወይም አድልዎ አያደርግም። ለቅድመ-ሲቪል መብቶች እንቅስቃሴ የበቀል እርምጃ። በመምሪያው ስር የሚሰጡ አገልግሎቶችን እና ፕሮግራሞችን ተደራሽነት ለማረጋገጥ ረዳት እርዳታዎች እና/ወይም አገልግሎቶች ተደራሽ ይሆናሉ። ለእርዳታ ወደ 303-688-4825 ይደውሉ።

Arabic

تلتزم إدارة الخدمات الإنسانية بمقاطعة دوغلاس بقوانين الحقوق المدنية الفيدرالية المعمول بها ولا تميز على أساس العرق أو اللون أو الأصل القومي أو الجنس (بما في ذلك الهوية الجنسية والتوجه الجنسي) أو العقيدة الدينية أو الإعاقة أو العمر أو المعتقدات السياسية أو الثأر أو الانتقام من نشاط سابق في مجال الحقوق المدنية. سيتم توفير الوصول إلى المساعدات الإضافية و/أو الخدمات من أجل ضمان الوصول إلى الخدمات والبرامج المقدمة من قبل الإدارة. للحصول على المساعدة اتصل على 303-688-4825

German

Die Personalverwaltung des Douglas County Departments hält sich an geltende bundesstaatliche Bürgerrechtsgesetze und diskriminiert keine Personen aufgrund Ihrer/es Rasse, Hautfarbe, Herkunft, Geschlecht (einschließlich der Geschlechtsidentität und der sexuellen Orientierung), religiöser Ausrichtung, Behinderung, Alters, politischer Überzeugungen oder Vergeltungen oder Vergeltungsmaßnahmen für frühere Bürgerrechts Aktivitäten. Die Bereitstellung von Hilfsmitteln und/oder Dienste wird erlaubt, um den Zugang zu Programmen gewährleisten zu können, die von der Abteilung bereitgestellt werden. Für Unterstützung melden Sie sich gerne unter 303-688-4825.



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French

Le Douglas County Department of Human Services (département des services humains du comté Douglas) respecte les lois fédérales applicables en matière de droits civiques et ne pratique aucune discrimination fondée sur la race, la couleur, l'origine nationale, le sexe (y compris l'identité de genre et l'orientation sexuelle), la croyance religieuse, le handicap, l'âge, les convictions politiques, ou les représailles pour une activité antérieure en matière de droits civiques. Des aides et/ou services auxiliaires seront fournis afin d'assurer l'accès aux services et programmes fournis par le ministère. Pour obtenir de l'aide, appelez le 303-688-4825.

E. Identification and Assessment of Need

1. The Douglas County Department of Human Services (Department) provides notice of the availability of and procedure for requesting auxiliary aids and/or services. When an individual with a disability requests or it is apparent the individual needs auxiliary aids or services in order to ensure effective communication and/or has limited English proficiency, staff will consult with the individual to determine what aids and/or services are necessary.
2. Examples of available auxiliary aids and/or services the Department may provide for someone who is deaf or hard-of-hearing include:
 - i. sign language interpreters
 - ii. note-takers
 - iii. telephone handset amplifiers
 - iv. written copies of oral announcements
 - v. assistive listening device
 - vi. telecommunications devices for deaf persons (TDDs)
 - vii. video relay interpretation (VRI)
3. Examples of available auxiliary aids and/or services the Department may provide for someone who is blind or who has low vision include:
 - i. reading documents aloud
 - ii. providing materials in large print
 - iii. electronically formatted material
4. Examples of available auxiliary aids and/or services the Department may provide for someone with speech or auditory processing disabilities include:
 - i. writing materials
 - ii. typewriters or computers
 - iii. telecommunications devices for deaf persons (TDDs)
 - iv. flashcards
 - v. alphabet boards
 - vi. computer aided real-time transcription (CART)
5. Examples of available auxiliary aids and/or services the Department may provide for someone with limited English proficiency include:



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- i. Oral interpretation
 - ii. Written translation in their person's native language
6. The above four lists are not exhaustive and alternative solutions may be available.

F. Requesting Auxiliary Aids and/or Services

1. Department staff are expected to provide requested auxiliary aids and/or services reasonably available at the time the need presents. Examples may include moving the discussion to a private interview room so the individual can hear better, reading documents aloud, allowing the individual to type his/her comments in a typed exchange, photocopying existing forms to a larger size, increasing the font on a document to a larger font, waiving the face-to-face interview, completing all exchanges in writing, or finding a fellow staff member who speaks the individual's language.
2. If staff are not able to provide such accommodations, they should contact the Civil Rights Coordinator to discuss the need or request any other immediately available resources and options, and to arrange for a reasonable auxiliary aid.

G. Interpreters

1. An individual who is deaf or hard-of-hearing or has limited English proficiency may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the person will not be used as interpreters unless specifically requested by that individual and only after an offer of an interpreter at no charge to the person has been made by the facility.
2. If the person chooses to use a family member or friend as an interpreter, the Department will consider issues including, but not limited to, competency of interpretation, confidentiality, privacy, possible domestic violence and/or undue influence, and conflict of interest will be considered. If the Department has any concerns pertaining to these issues or any other that may have a bearing on the appropriateness of the interpreter, the Department will deny the request.
3. The use of minor children will be assessed on every case at every interaction. Minor children will only be allowed to function as an interpreter for questions of a general, informational nature. Examples include requesting an application and scheduling an appointment, confirming who to contact regarding auxiliary aids and/or services. Situations in which a minor child will not be allowed to interpret include when the inquiry or conversation includes details of a Child Support, Child Welfare, or Adult Protection case, or a fraud investigation in which the minor child is a party or relative. In other situations which may be inappropriate,



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staff will confer with their Supervisor, Manager, Administrator or Civil Rights Coordinator before a minor child is permitted to interpret.

H. Essential Communications

1. Department staff will ensure that individuals with disabilities who request, or it is apparent the individual needs auxiliary aids or services in order to effectively communicate and/or has limited English proficiency, will receive information concerning application, benefits, services, waivers of rights, releases, treatment, or service plans, and appeals by having them provided in an alternate means as described in F. above.

I. Fees

1. The Department will not charge the individual any fee for interpretation/translation services, auxiliary aids/services or costs associated with modifications.

J. Filing a Grievance Except for SNAP/Food Assistance

1. Grievances must be submitted to the Department's Civil Rights Coordinator (or his/her designee) as soon as possible, but no later than thirty (30) calendar days after the date the person filing the grievance becomes aware of the alleged discriminatory action. A grievance must be in writing and include the name and address of the person filing it. The grievance must state the problem or action alleged to be discriminatory, and the remedy or relief sought.
2. If the person filing the grievance cannot reduce the grievance to writing for any reason the following options are permissible:
 - i. call the Civil Rights Coordinator and leave a voice mail message on their phone; the message will be saved to the Civil Rights Coordinator's County network file; the message could be later transcribed, or
 - ii. meet with the Civil Rights Coordinator in person in the Department's interview room which contains audio/video recording technology; the visit will be saved to the Civil Rights Coordinator's County network file; the message could be later transcribed, or audio or video record their complaint and mail a copy of it to the Civil Rights Coordinator.
 - iii. Someone filing a grievance may provide the written grievance in their language with which they have the greatest degree of comfort. The Department will have the document translated and retain both the original and the translated copy together at all times.



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K. Filing a SNAP/Food Assistance Grievance

1. All other items contained in this policy except J. above also apply to SNAP/Food Assistance Grievances.
2. Grievances must be submitted in writing and must be date stamped or have the date otherwise clearly noted. The person may elect to use the USDA Complaint form found on the USDA Office of the Assistant Secretary for Civil Rights website, or in some other written format. A grievance must include:
 - i. Name, address, telephone number, or other means of contact,
 - ii. Location and name of office where alleged discrimination occurred,
 - iii. Nature of incident or action,
 - iv. Protected category, e.g., age or religion,
 - v. Name and titles (if appropriate) of person(s) who may have knowledge of the alleged act, and
 - vi. Date(s) on which the alleged act occurred.
3. If the person filing the grievance cannot reduce the grievance to writing for any reason the following options are permissible:
 - i. call the Civil Rights Coordinator and leave a voice mail message on their phone; the message will be saved to the Civil Rights Coordinator's County network file; the message could be later transcribed, or
 - ii. meet with the Civil Rights Coordinator in person in the Department's interview room which contains audio/video recording technology; the visit will be saved to the Civil Rights Coordinator's County network file; the message could be later transcribed, or
 - iii. audio or video record their complaint and mail a copy of it to the Civil Rights Coordinator, or
 - iv. submit the complaint information to the Colorado Department of Human Services' (CDHS) office that will in turn ensure it is forwarded to the US Department of Agriculture, Food and Nutrition Service.
4. The grievance must be filed within 180 days from the date of the alleged discrimination.

L. Assistance with Filing and Interpreters

1. Department staff will assist interested persons in filing grievances and will forward grievances to the Civil Rights Coordinator for investigation or further assistance. Such assistance includes reasonable modifications and appropriate auxiliary aids and services necessary to file the grievance and participate in the grievance process. Such arrangements may include making the grievance procedure available in alternate formats such as large print, audiotape, providing



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interpreters for the deaf or hard-of-hearing, or assuring a barrier-free location for proceedings.

2. An individual who is deaf or hard-of-hearing or has limited English proficiency may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the person will not be used as interpreters unless specifically requested by that individual and only after an offer of an interpreter at no charge to the person has been made by the facility.
3. If the person chooses to use a family member or friend as an interpreter, the Department will consider issues including, but not limited to, competency of interpretation, confidentiality, privacy, possible domestic violence and/or undue influence, and conflict of interest will be considered. If the Department has any concerns pertaining to these issues or any other that may have a bearing on the appropriateness of the interpreter, the Department will deny the request.
4. The use of minor children will be assessed on every case at every interaction. Minor children will only be allowed to function as an interpreter for questions of a general, informational nature. Examples include requesting an application and scheduling an appointment, confirming who to contact regarding auxiliary aids and/or services.
5. Situations in which a minor child will not be allowed to interpret include when the inquiry or conversation includes details of a Child Support, Child Welfare, or Adult Protection case, or a fraud investigation in which the minor child is a party or relative. In other situations which may be inappropriate, staff will confer with their Supervisor, Manager, Administrator or Civil Rights Coordinator before a minor child is permitted to interpret.

M. Investigations and Files

1. The Civil Rights Coordinator (or his/her designee) will conduct an investigation of the grievance. This investigation may be informal, but it will be thorough and afford all interested persons an opportunity to submit evidence relevant to the grievance. The Civil Rights Coordinator will maintain files and records (paper and any electronically submitted evidence or reports) relating to such grievances.
2. The Civil Rights Coordinator will issue a written decision to the client on the grievance no later than thirty (30) calendar days after its filing. If the Civil Rights Coordinator is unable to complete the investigation due to no delay on the Department's part, the Civil Rights Coordinator will notify the individual in writing that the investigation will be done within sixty (60) calendar days.



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3. The Civil Rights Coordinator's decision will include information regarding additional grievance resolution steps available. If the written grievance was not submitted in English, the Department's written response will be provided in both English and the language in which the original grievance was submitted.
4. Findings will be communicated to the Management Team and the Team will decide the appropriate course of action. The Civil Rights Coordinator and Program Manager(s) will be responsible for completing and monitoring any tasks decided by the Management Team and will provide the needed follow-up and reporting.
5. All informal and formal investigations are tracked manually by the Civil Rights Coordinator. The records are kept electronically and remain accessible indefinitely.
6. Any investigation conducted by the cognizant state and/or federal agency will be solely the responsibility of that agency. Department staff will not be able to provide status updates or otherwise advise or involve themselves in any state or federal investigation without clear and specific involvement requested by that agency to the Director.

N. Appeals

1. After receipt of the Civil Rights Coordinator's decision, the individual may appeal the decision in writing within fifteen (15) calendar days. Department appeals will be conducted by the director. The appeal may be forwarded to the director personally or forwarded to the Civil Rights Coordinator who will ensure receipt by the Director. The individual may submit additional information or rely on the documentation and statements provided in the course of the initial grievance. The Director will issue a written decision on the appeal no later than thirty (30) calendar days after its filing.
2. Any appeal conducted by the cognizant state and/or federal agency will be solely the responsibility of that agency. Department staff will not be able to provide status updates or otherwise advise or involve themselves in any state or federal investigation without clear and specific involvement requested by that agency to the Director.

O. Training

1. Department staff will be trained on this plan annually.



Douglas County Department of Human Services

P. Department Complaints

1. Non civil rights related complaints will be referred to the appropriate supervisor or manager. If needed, the complaint will be referred to the Deputy Director and/or Director.
2. Civil rights complaints that may be the responsibility of the County, will be referred to the appropriate Department or personnel.