

 Policy #: <b>Admin-3</b>	Effective Date: 5-25-17	Page #: 1 of 2
<b>Ref #:</b> 1302 Subparts A-J WI DCF Civil Rights Compliance Plan appendices D&E	Policy Council Approval Date: 5/17/2017 Board of Directors Approval Date: 5/25/2017	<b>Revision Date:</b> <b>Reviewed Date: 5/24/23</b>

**SUBJECT:** Equal Opportunity in Service Delivery

**POLICY:** It is the policy of Rock-Walworth Comprehensive Family Services, Inc. Head Start and Early Head Start, to comply with the equal opportunity policy and standards of the Wisconsin Department of Children and Families, the Department of Health Services and the Department of Workforce Development and all applicable state and federal statutes and regulations relating to nondiscrimination in service delivery and employment (for employment policies, please see Equal Opportunity and Harassment policies in the RWCFS Policies and Procedures Employee handbook).

**Policy statement**

**Service Delivery:**

No otherwise qualified applicant for served or program participation shall be excluded from participation, be denied benefits, or otherwise be subjected to discrimination in any manner on the basis of race, color, national origin, age, sex, sexual identity, sexual orientation, religion, political beliefs or disability or any other status protected by state or federal law. No employee or other person shall intimidate, threaten, coerce or discriminate against any otherwise qualified individual for the purpose interfering with any right or privilege secured under one of the applicable civil rights laws, or because they have made a complaint, testified, assisted, or participated in any manner in an investigation, proceeding or hearing under one of the applicable civil rights laws. Program access for persons with disabilities is covered in the Americans with Disabilities Act of 1990 and section 504 of the Rehabilitation act of 1973 as amended. Political belief or affiliation is protected under the Food Stamp Act of 1997 and the Workforce Investment Act of 1998. This policy covers the eligibility for access to service delivery, and to treatment in all of the programs, services and activities. All employees are expected to support the goals and programmatic activities relating to nondiscrimination in service delivery.

**PROCEDURE:**

Employees will receive annual training on this policy and will annually signify commitment to follow this policy by signing and dating an acknowledgment statement.

The RWCFS Program Design Director will also act as the Equal Opportunity Coordinator and Limited English Proficiency Coordinator and the Executive Director will act as the Complaint Coordinator. Changes in people holding these positions will be reported to the Department of Children and Families within 10 working days of the change.

### **Complaints:**

Individuals can file an **informal discrimination complaint** with RWCFS or file a formal complaint with a state or federal agency. Complaints alleging discrimination on the basis of age in programs funded by the US Department of agriculture, Food and Nutrition services (USDA)-FNS) must be filed directly with the USDA Office of adjudication, 1400 Independence Avenue, S.W., Washington D.C. This complaint will be forwarded to the appropriate FNS regional office within five working days after the receipt. No one may threaten or harass individuals for making a complaint or witnesses because they are willing to say what they saw, heard or experienced. Complaints filed under the Federal Health Care Provider Conscience Protection laws must be filed directly with the Health and Human services Office of Civil rights.

**Informal Complaints** should be made verbally or in writing to the RWCFS Equal Opportunity Coordinator (Program Design Director) as soon as possible. If a program participant believes that the Program Design Director is directly or indirectly involved in the alleged discriminatory action, the complaint should be made verbally or in writing to the Executive Director as soon as possible.

All **formal complaints** must be filed within 180 days of the event or the treatment the individual feels was discriminatory. However, the individual should file a complaint as soon as possible after the action takes place. If an individual files an informal complaint and is not satisfied with the resolution, he/she can still file a formal complaint as long as it is within the filing time frame. An individual should not wait until after he/she gets an answer to the informal complaint if he/she plans to make a formal complaint.

When filing a formal complaint the completed complaint form can be sent directly to the appropriate state or federal agency. A letter should be included with the complaint form that states that the complaint is being made to a specific entity as the funding source(s) for RWCFS. Staff of the state or federal agency will provide results to the complainant within 90 days.

The Complaint Coordinator (Executive Director) will provide support to complainants as requested and to the Equal Opportunity Coordinator to support resolution of informal complaints, maintain a record of all known complaints, and ensure complainants know where formal complaints can be sent.