

TO: Kelli Hammer Levy, Director, Public Works  
FROM: Jeffery Lorick, Director, Office of Human Rights  
CC: Barry Burton, County Administrator  
RE: Civil Rights Standard Assurances | Federal Award Identification Number  
06OHBIO00014 BioWatch Program

The Pinellas County Office of Human Rights is committed to protecting all residents of Pinellas County from cases of discrimination in the areas of fair housing, employment, public accommodations, and government programs and assistance. These include race, color, religion, national origin, marital status, familial status, pregnancy, gender (including gender identity and gender expression), sexual orientation, sexual harassment, age, and disability.

The Pinellas County Office of Human Rights has conducted a review of the required Civil Rights assurances at the request of the Public Works Department for the BioWatch Program. Per the Department of Homeland Security (DHS) agreement Standard Terms and Conditions, any recipient of DHS award (and any "subrecipient" at any tier) must comply with additional civil-rights-related requirements below and beyond those that otherwise would apply. In general, these additional requirements fall into one of two categories:

- Civil rights laws. These apply to essentially any entity that receives an award of federal financial assistance -- regardless of which federal agency awards the grant or cooperative agreement -- and encompass the "program or activity" funded in whole or in part with the federal financial assistance.
- Nondiscrimination provisions. These are requirements or restrictions that apply, in addition to the civil rights laws, to any program or activity receiving federal financial assistance. Much like the civil rights laws, these provisions apply variously to the programs, activity, or undertaking funded in whole or in part by the DHS.

On behalf of the Office of Human Rights for Pinellas County government, I have reviewed the Civil Rights Standard Assurances required by the grantor and conclude that the Counties' policies align with the statutes referenced below, and reminds the Department that any subrecipient of funding under this award would also be subject to compliance of the following:

PLEASE ADDRESS REPLY TO:  
Pinellas County Office of Human Rights  
400 South Fort Harrison Avenue, 5<sup>th</sup> Floor  
Clearwater, Florida 33756  
PHONE: (727) 464-4880  
FAX: (727) 464-4157  
TDD: (727) 464-4062  
WEBSITE: [pinellascounty.org/humanrights](http://pinellascounty.org/humanrights)

- **Civil Rights Applicable Statutes:**

- Section 601 of the Civil Rights Act of 1964 (42 U.S.C. § 2000d)
- Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794)
- Section 901 of the Education Amendments of 1972 (20 U.S.C. § 1681)
- Section 303 of the Age Discrimination Act of 1975 (42 U.S.C. § 6102)

- **Nondiscrimination Applicable Statutes:**

- **Title VI of the Civil Rights Acts of 1964:** No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. The Act goes on to explain that the statute shall not be construed to authorize action with respect to any employment practice of any employer, employment agency, or labor organization (except where the primary objective of the Federal financial assistance is to provide employment).
- **Section 13 of the 1972 Amendments to the Federal Water Pollution Control Act:** No person in the United States shall on the ground of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under the Federal Water Pollution Control Act, as amended. Employment discrimination on the basis of sex is prohibited in all such programs or activities.
- **Section 504 of the Rehabilitation Act of 1973:** No otherwise qualified individual with a disability in the United States shall solely by reason of disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Employment discrimination on the basis of disability is prohibited in all such programs or activities.
- **Age Discrimination Act of 1975:** No person on the basis of age shall be excluded from participation under any program or activity receiving Federal financial assistance. Employment discrimination is not covered. Age discrimination in employment is prohibited by the Age Discrimination in Employment Act administered by the Equal Employment Opportunity Commission.
- **Title IX of the Education Amendments of 1972:** No person in the United States on the basis of sex shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance. Employment discrimination on the basis of sex is prohibited in all such education programs or activities. Note: an education program or activity is not limited to only those conducted by a formal institution.
- **American with Disabilities Act of 1990:** No person shall be discriminated against on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities.

- **Specific Requirements set out in Department of Homeland Security Civil Rights  
Evaluation Tool:**

As a condition of receipt of Federal financial assistance, the recipient is required to comply with applicable provisions of laws and policies prohibiting discrimination, including, but not limited to:

- Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, or national origin (including limited English proficiency).
- Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination based on disability.
- Title IX of the Education Amendments Act of 1972, which prohibits discrimination based on sex in education programs or activities.
- Age Discrimination Act of 1975, which prohibits discrimination based on age.
- U.S. Department of Homeland Security regulation 6 C.F.R. Part 19, which prohibits discrimination based on religion and social service programs.

If you have any questions regarding the above, please contact me directly. Thank you.

Sincerely,



Jeffery Lorick  
Director Office of Human Rights

date 3-15-2022

**PLEASE ADDRESS REPLY TO:**  
Pinellas County Office of Human Rights  
400 South Fort Harrison Avenue, 5<sup>th</sup> Floor  
Clearwater, Florida 33756  
PHONE: (727) 464-4880  
FAX: (727) 464-4157  
TDD: (727) 464-4062  
WEBSITE: [pinellascounty.org/humanrights](http://pinellascounty.org/humanrights)