

DEPARTMENT OF HOMELAND SECURITY
CIVIL RIGHTS EVALUATION TOOL

OMB Control No. 1601-0024
 Expiration Date 08/31/2024

Section 1: Instructions

Recipients (as defined in 2 C.F.R. Part 200 and including recipients acting as pass-through entities) of Federal financial assistance from the U.S. Department of Homeland Security (DHS) or one of its awarding component agencies must complete this tool within thirty (30) days of receipt of the Notice of Award for the first award under which this term applies. Recipients of multiple awards of DHS financial assistance should only submit one completed tool for their organization, not per award.

Recipients should submit the completed tool, including supporting materials, to CivilRightsEvaluation@hq.dhs.gov. This tool clarifies the civil rights obligations and related reporting requirements contained in the [DHS Standard Terms and Conditions](#).

Subsequent submissions: After the initial submission, recipients are required to complete the tool once every two (2) years if they have an active award, not every time an award is made. After the initial submission, recipients are only required to submit updates. If there are no updates since the initial submission, the recipient can indicate "no change" for each item as applicable to satisfy the biyearly requirement. Recipients should not re-submit information previously submitted. The due date for submitting updates is calculated from two (2) years from the date the recipient last submitted the tool to DHS. DHS will send an email reminder to the contact person identified in Section 2 prior to the due date for the biyearly update.

Subrecipients: Subrecipients are not required to complete and submit this tool to DHS. However, subrecipients have the same obligations as pass-through entities and recipients to comply with applicable civil rights requirements and should follow their pass-through entities' instructions for submitting civil rights information to those entities.

Extensions: The DHS Office for Civil Rights and Civil Liberties will consider, in its discretion, granting an extension if the recipient identifies steps and a timeline for completing the tool. Recipients should request extensions by emailing the request to CivilRightsEvaluation@hq.dhs.gov prior to expiration of the 30-day deadline.

Section 2: Organization Information

Organization Name: Pinellas County dba Board of County Commissioners	DUNS Number: 055200216
Address (Street, City, State, Zip code): 315 COURT ST RM 601 Clearwater, FL 33756-5165	
Contact Person / Title: Ms. Sheila E. Schneider, MSCM/Environmental Division Manager	
Email / Telephone: sschneider@pinellascounty.org	
Grant Agreement Number: 06OHBIO00014-15-00 (2006-ST-091-000016)	Federal Award Identification Number: 06OHBIO00014

Section 3: Civil Rights Requirements

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 in social service programs.

Section 4: Required Information

1. Provide the total number of complaints or lawsuits against the recipient during the past three (3) years alleging discrimination on the basis of race, color or national origin (including limited English proficiency), sex, age, disability, religion, or alleging retaliation. For each complaint or lawsuit, state the following:
 - a. Employment or non-employment related;
 - b. Basis (race; color; national origin, including limited English proficiency; sex; age; disability; religion); or alleging retaliation; and
 - c. Status (pending, closed with findings, closed with no findings).Additionally, if a court or administrative agency made a finding of discrimination in a non-employment complaint for the above three (3) years, forward a copy of the complaint and findings to DHS.
Responses should not include personally identifiable information (PII) that is outside of public record. PII is any information that permits the identity of an individual to be directly or indirectly inferred, including any information which is linked or linkable to an individual.
2. Provide a brief description of any civil rights compliance reviews regarding the recipient conducted during the two (2) year period before this award of DHS Federal financial assistance.
3. Provide a statement affirming that staff has been designated to coordinate and carry out the responsibilities for compliance with civil rights laws, and a description of the responsibilities of any such staff.
4. Provide a copy of the recipient's nondiscrimination policy statement referencing the laws and regulations in Section 3.
5. Provide a copy of the recipient's discrimination complaints process.
6. Provide a copy of the recipient's plan to ensure compliance in subrecipient programs (only applies to state administering agencies and other recipients that provide assistance to subrecipients). The plan should describe the process for conducting reviews of subrecipients.
7. Provide copies of the recipient's policy and procedures used to ensure nondiscrimination and equal opportunity for persons with disabilities to participate in and benefit from the recipient's programs and services.
8. Provide copies of the recipient's policy and procedures regarding the requirement to provide meaningful access to programs and services to individuals with limited English proficiency (LEP).

Section 5: Additional Information

Resources for recipients related to the above requirements: <http://dhs.gov/resources-recipients-dhs-financial-assistance>

For questions and assistance with this form, please contact:

DHS Office for Civil Rights and Civil Liberties

Email: CivilRightsEvaluation@hq.dhs.gov

Phone: 202-401-1474

Toll Free: 1-866-644-8360

TTY: 202-401-0470

Toll Free TTY: 1-866-644-8361

Federal Emergency Management Agency, Office of Equal Rights (for FEMA recipients):

Email: fema-civil-rights-form@fema.dhs.gov

Phone: 202-646-3535

Paperwork Reduction Act

The public reporting burden to complete this information collection is estimated at 3 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and the completing and reviewing the collected information. The collection of information is mandatory. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number and expiration date. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to:

ATTN: PRA [OMB Control No.1601-NEW].

Office for Civil Rights and Civil Liberties

U.S. Department of Homeland Security

Building 410, Mail Stop #0190

Washington, D.C. 20528

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- a. Employment or non-employment related;
 - b. Basis (race; color; national origin, including limited English proficiency; sex; age; disability; religion); or alleging retaliation; and
 - c. Status (pending, closed with findings, closed with no findings).
- Additionally, if a court or administrative agency made a finding of discrimination in a non-employment complaint for the above three (3) years, forward a copy of the complaint and findings to DHS.
- Responses should not include personally identifiable information (PII) that is outside of public record. PII is any information that permits the identity of an individual to be directly or indirectly inferred, including any information which is linked or linkable to an individual.**

For Employment Complaints:

<i>Date Opened</i>	<i>Case #</i>	<i>Agency/Court</i>	<i>Discrimination Type</i>	<i>Status</i>	<i>Closed</i>
2/17/2022	511-2022-01288	EEOC	Disability	Charge of Discrimination filed	
12/6/2021	511-2021-02799	EEOC	Disability	Response to Claim filed 1/5/22	
9/28/2021	511-2021-01624	EEOC	Sexual Harassment	Response to Claim filed 11/5/2021	
2021	4:21-cv-00186	U.S. Northern District Fla.	SB90 -First Amendment violation	Discovery ongoing	
2021	4:21-cv-00187	U.S. Northern District Fla.	SB90 - Unconstitutionally burdens right to vote	Discovery ongoing	
2021	4:21-cv-201	U.S. Northern District Fla.	SB90 - Violation of 1st, 14th, 15th Amendments; race based	Discovery ongoing	
2021	4:21-cv-242	U.S. Northern District Fla.	SB90 - Violation of 1st, 14th Amendment; disability based	Response to Complaint Pending	
2021	15D2021-00552	EEOC	Disability/medical condition	No Reasonable Cause	12/14/2021
10/15/2020	511-2020-04126	EEOC	National Origin / Disability	Response to Charge Filed 3/10/2021	
4/27/2020	511-2020-03031	EEOC	Disability	Response to Charge Filed 6/2/2020	
2020	8:20-cv-02005-TPBAEP	Middle District FL	Gender Identity	Dispositive Motions Pending	
2019	511-2019-01285	EEOC	Reasonable Accommodation	Settled	
2019	511-2019-00417	EEOC	Race/Gender	Dismissed	

Pinellas County dba Board of County Commissioners


Grant Agreement Number: 06OHBIO00014-16-01 (formerly 2006-ST-091-000016)

Required Data Submission

<i>Date Opened</i>	<i>Case #</i>	<i>Agency/Court</i>	<i>Discrimination Type</i>	<i>Status</i>	<i>Closed</i>
2019	511-2019-02377	EEOC	Race/Color/Retaliation	Dismissed	
2019	846-2019-01811	EEOC	Race	Dismissed	
6/29/18	511-2018-2226	EEOC	Disability	Closed	7/30/2018
6/4/2018	15D201800733	EEOC/FCHR	Sexual Harassment / Disability/Retaliation	Settled	10/7/2020
2018	18-002600-CI	6th Circuit	Employment / Race	Pending	
2018	511-2018-04591	EEOC	Disability	Dismissed	
2018	511-2018-02944	EEOC	Sex/Sexual Orientation	Dismissed	

For Non-Employment Discrimination Complaints against Pinellas County under Title VI, ADA Title II, the FHA, etc.:

CASE/CHARGE #	DATE	AUTHORITY	BASIS	AGENCY	ISSUE	DATE CLOSED	RESOLUTION
DOT#: 2015-0048	5/29/2015	ADA	Disability	FDOT	Accessible Route	Pending	
04-19-8369-8 / PC-19-068	7/31/2020	Title VIII of the Civil Rights Act of 1968, as amended	Disability	HUD/PCOHR	Denial of parking in Handicap parking; Harassment	12/21/2021	Closed as a Failure to Cooperate
04-20-0295-8/ PC-20-009	6/30/2020	Title VIII of the Civil Rights Act of 1968, as amended	Disability	HUD/PCOHR	Denial of parking as a Reasonable Accommodation/Harassment	2/7/2022	Complainant died
04-19-8060-8 / PC-19-062	8/14/2020	Title VIII of the Civil Rights Act of 1968, as amended	National Origin/Retaliation	HUD/PCOHR	Different terms/Conditions and Retaliation	Open	In negotiations with the respondent
04-20-9950-8/ PC-20-007	12/17/2019	Title VIII of the Civil Rights Act of 1968, as amended	Disability	HUD/PCOHR	Different terms and conditions/Denial of support animal and harassment	11/18/2021	Case dismissed due to respondent bankruptcy
04-20-2631-8/ PC-20-035	2/23/2022	Title VIII of the Civil Rights Act of 1968, as amended	Disability	HUD/PCOHR	Denial of parking as a Reasonable Accommodation	On-going	
04-21-4997-8/ PC-21-011	8/12/2021	Title VIII of the Civil Rights Act of 1968, as amended	Disability	HUD/PCOHR	Denial of Reasonable Modification	On-going	Currently with GulfCoast Legal Services
04-21-7231-8/ PC-21-041	2/23/2022	Title VIII of the Civil Rights Act of 1968, as amended	Disability	HUD/PCOHR	Denial of support animal	On-going	Currently with Bay Area Legal Services

Section 4: Required Information	
2.	<p>Provide a brief description of any civil rights compliance reviews regarding the recipient conducted during the two (2) year period before this award of DHS Federal financial assistance.</p> <p>N/A</p>
3.	<p>Provide a statement affirming that staff has been designated to coordinate and carry out the responsibilities for compliance with civil rights laws, and a description of the responsibilities of any such staff.</p> <p>The Pinellas County Office of Human Rights is the designated agency to handle all civil rights and EEO issues for Pinellas County. Concomitant with this responsibility, the Director of Human Rights serves as Pinellas County’s Civil Rights, Title VI, and ADA Officer. The Director may be contacted as follows:</p> <p style="padding-left: 40px;">Jeffery Lorick Director, Pinellas County Office of Human Rights Civil Rights Officer/Title VI Officer/ADA Officer 400 S Fort Harrison Avenue, 5th Floor Clearwater, FL 33756 (727) 464-4880 jlorick@co.pinellas.fl.us</p>
4.	<p>Provide a copy of the recipient’s nondiscrimination policy statement referencing the laws and regulations in Section 3.</p> <p>Office of Human Rights: Pinellas County, Florida - Office of Human Rights</p> <p>See the following non-discrimination policies:</p> <p>ADA/Section 504 of the Rehabilitation Act – found at http://www.pinellascounty.org/Humanrights/ada.htm:</p> <p>Pinellas County complies with all federal, state and local laws which relate to persons with disabilities (including, but not limited to the ADA, as amended, Section 504 of the Rehabilitation Act of 1973, the Fair Housing Act, and the Florida Civil Rights Act). This includes providing reasonable accommodation(s) when warranted.</p> <p>Request for Government Programs / Assistance accommodations: We ask that such requests be made at least three (3) business days in advance.</p> <ul style="list-style-type: none"> ▪ ADA Complaint Form/Claim  <p>Persons who wish to discuss requests for reasonable accommodation(s) relating to Pinellas County programs, services, or facilities may contact: the</p> <p style="padding-left: 40px;">Office of Human Rights 400 S. Fort Harrison Ave., 5th Floor, Clearwater, FL 33756 Hours: Monday - Friday 8 a.m. – 5 p.m. PH: (727) 464-4880 FAX: (727) 464-4157 TDD: (727) 464-4062</p> <p>Title VI of the Civil Rights Act of 1964 – found at http://www.pinellascounty.org/humanrights/titlevi-policy-grievance.htm</p> <p>"No person in Pinellas County shall, on the ground 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 pursuant to the requirements of Title VI of the 1964 Civil Rights Act."</p> <p>Pinellas County prohibits discrimination in the operation of any federally assisted program on the basis of race, color, or national origin. Pinellas County makes every effort to assist those with limited English proficiency, including maintaining a list of employees fluent in languages in addition to English to help with translations and utilizing Google translator program on the website.</p> <p>Title VI Complaint Form</p> <p>Title VII of the Civil Rights Act – found at http://www.pinellascounty.org/hr/pdf/policies_proc/anti-harassment-policy.pdf</p>

Pinellas County Anti-Harassment Policy under Title VII of the Civil Rights Act

1. General:

It is the policy of Pinellas County to maintain a work environment free from verbal or physical conduct that unreasonably harasses, disturbs, or interferes with an employee's work performance or that creates an intimidating, offensive, or hostile environment based on one's race, color, national origin, religion, gender (including gender identity or gender expression and sexual harassment), sexual orientation, disability, pregnancy, age, political affiliation, military status, or any other characteristic protected by federal, state or local law.

This policy prohibits harassment that impacts the workplace, no matter where or in what medium or forum it occurs.

Examples of prohibited conduct include, but are not limited to:

- (1) unwanted physical contact or offensive conduct of a sexual nature, including flirtations, advances, or propositions;
- (2) verbal harassment about an individual's gender or sexual interest, sexual innuendos, and offensive jokes or descriptions of personal sexual conduct;
- (3) demeaning, degrading, or insulting comments about a person's physical appearance or any characteristic enumerated above;
- (4) displaying photos or other media which are demeaning, insulting, intimidating, or sexually suggestive; and
- (5) demeaning, insulting, sexually suggestive, or otherwise offensive written, recorded, or electronically transmitted messages.

2. Reporting:

a. An employee who believes they are subjected to conduct prohibited by this policy must report such conduct as soon as possible to the Office of Human Rights (OHR) at 727-464-4880. OHR will notify the Appointing Authority and appropriate Board Chair or Vice Chair if necessary (though no discipline shall be imposed for failure to do so).

b. If a supervisor or manager becomes aware that harassment or discrimination is occurring, either from personal observations or as a result of an employee coming forward, the supervisor or manager must immediately report it to OHR.

3. Investigation and Discipline:

a. Allegations shall be treated seriously and investigated promptly by OHR.

b. Employees also remain free to report such activity to the Equal Employment Opportunity Commission or Florida Commission on Human Relations.

c. Once OHR commences an investigation under this policy, they will work with the Appointing Authority to assure the complainant and alleged harasser interact only to the extent that business necessity dictates if complete separation of the parties during the pendency of any investigation proves impractical. However, no adverse action will be taken against a complaining employee in order to accomplish this separation.


d. In the event an Appointing Authority who reports to a Board has been accused of harassment, OHR shall consult with the Chair of said Board to determine how best to accomplish separation during the pendency of the investigation.

e. Allegations against a Commissioner, Constitutional Officer, or anyone in OHR shall be forwarded by OHR to the Equal Employment Opportunity Commission or Florida Commission on Human Relations for investigation.

f. To ensure fairness to all parties, an investigation will be conducted in a confidential manner and include the taking of oral and written statements from all parties involved and any witnesses. Any alleged harasser will be provided the opportunity to respond to allegations of harassment.

g. Any refusal by an employee to participate in an investigation initiated under this policy by the designated County official, after being advised that statements made and evidence gathered as a result are not admissible in a criminal proceeding, shall be considered a violation of this policy and Unified Personnel System Rule 6. There shall be no retaliation for participating in an investigation of alleged harassment.

h. Violations of this policy may result in discipline up to and including termination.

<p>5.</p>	<p>Provide a copy of the recipient's discrimination complaints process.</p> <p>The complaint process for complaints under the ADA/Section 504 of the Rehabilitation Act are processed as follows:</p> <ul style="list-style-type: none"> • ADA Complaint Form / Claim • ADA Grievance Process <p>The complaint process for complaints under Title VI of the Civil Rights Act of 1964 are processed as follows: http://www.pinellascounty.org/humanrights/titlevi-policy-grievance.htm</p> <p>The complaint process for complaints under Title VII of the Civil Rights Act of 1964 are processed as follows: https://www.pinellascounty.org/hr/pdf/policies_proc/anti-harassment-policy.pdf</p>
<p>6.</p>	<p>Provide a copy of the recipient's plan to ensure compliance in subrecipient programs (only applies to state administering agencies and other recipients that provide assistance to subrecipients). The plan should describe the process for conducting reviews of subrecipients.</p>
<p>7.</p>	<p>Provide copies of the recipient's policy and procedures used to ensure nondiscrimination and equal opportunity for persons with disabilities to participate in and benefit from the recipient's programs and services.</p> <p>ADA/Section 504 of the Rehabilitation Act – found at http://www.pinellascounty.org/Humanrights/ada.htm:</p> <p>Pinellas County complies with all federal, state and local laws which relate to persons with disabilities (including, but not limited to the ADA, as amended, Section 504 of the Rehabilitation Act of 1973, the Fair Housing Act, and the Florida Civil Rights Act). This includes providing reasonable accommodation(s) when warranted.</p> <ul style="list-style-type: none"> • Request for Government Programs / Assistance accommodations: We ask that such requests be made at least three (3) business days in advance. • ADA Complaint Form/Claim  Pinellas County prohibits discrimination in the operation of any federally assisted program on the basis of race, color, or national origin. Pinellas County makes every effort to assist those with limited English proficiency, including maintaining a list of employees fluent in languages in addition to English to help with translations and utilizing Google translator program on the website. <p>Persons who wish to discuss requests for reasonable accommodation(s) relating to Pinellas County programs, services, or facilities may contact: the</p> <p style="padding-left: 40px;">Office of Human Rights 400 S. Fort Harrison Ave., 5th Floor, Clearwater, FL 33756 Hours: Monday - Friday 8 a.m. – 5 p.m. PH: (727) 464-4880 FAX: (727) 464-4157 TDD: (727) 464-4062</p>
<p>8.</p>	<p>Provide copies of the recipient's policy and procedures regarding the requirement to provide meaningful access to programs and services to individuals with limited English proficiency (LEP).</p> <p>Pinellas County's LEP Plan can be found here: Pinellas County's Limited English Proficiency (LEP) Plan</p>