

CIVIL RIGHTS COMPLIANCE PLAN

Lake County
18 N. County Street
Waukegan IL 60085

The purpose of the **Civil Rights Compliance Plan** is to ensure compliance with Federal Civil Rights law in all its application to the business of Lake County; including as a recipient of federal financial assistance from numerous U.S. Departments and agencies and to inform all County staff of their legal obligations and applicants and clients of County services of their rights. Additionally, this plan affirms the County's intent to comply with federal and state civil rights laws, including Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Americans with Disabilities Act of 1990, Title II, Community Services Assurance Provisions of the Hill-Burton Act, Family Violence and Services Act, and the Food Stamp Act of 1977.

Lake County employees, programs, and policies cannot discriminate against clients or applicants for services on the basis of race, color, national origin, sex, sexual orientation, age, creed, religion, political beliefs, physical, mental or emotional disability or status with regard to public assistance. Lake County employees, programs, and policies must also allow physical and program access for people with disabilities. This civil rights policy covers Lake County's full range of program benefits and services, including, but not limited to, access to information about services, eligibility determinations, intake and admission procedures and treatment. The policy applies to all Lake County programs and services without regard to funding source (e.g. state, federal, local or private financial assistance). It also applies to programs and services carried out by other public or private agencies or providers under contracts, licenses or other arrangements.

This plan applies to all Offices, Divisions and Departments of Lake County and identifies internal procedures for prompt and equitable resolution of complaints alleging any action prohibited by this policy and federal or state law. This policy is intended as a broad commitment on the part of Lake County regarding non-discrimination. Departments within the County that receive funding from certain Federal and State of Illinois Agencies may have more specific requirements, including but not limited to, contract and notification language, forms, program specific equal opportunity officers, and employee training. This policy is not meant to incorporate all of these elements.

Contact Information

Director of Human Resources
18 N. County St., 7th Fl.
Waukegan, IL 60085
847-377-2700

Equal Opportunity Policy

Office of Civil Rights (OCR) guidelines, require Lake County to develop a written equal opportunity policy. It is the policy of Lake County to provide federally financed services, financial aid and benefits of programs and activities without discrimination on the basis of race, color, national origin, sex, sexual orientation, age, religion, creed, political beliefs, disability or any other protected class. This policy extends to prohibit discrimination in services that are administered and delivered according to Federal and State civil rights laws, executive orders, rules and regulations.

“Equal opportunity” has the following components:

- That no otherwise qualified person, under any program or activity receiving federal financial assistance (and state financed under ADA), shall be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination;
- That each program or activity is conducted so when viewed in its entirety, it is readily accessible to and usable by individuals with physical, mental or emotional disabilities, including making reasonable accommodations or modifications in policies, practices or procedures when necessary unless doing so would result in either a fundamental alteration in the nature of the program or undue financial and administrative burdens;
- That applicant/client eligibility determinations, assignments to staff and facilities, treatment by staff, access to information about programs, physical and programmatic access to facilities, referral services, intake and admissions procedures assessment, diagnosis, evaluation and treatment, outreach and termination of services are made without regard to protected class status, and
- That services and information will be translated to the appropriate language for persons with limited English proficiency when necessary. Appropriate auxiliary aids and services including, but not limited to, use of a TTY/TDD and/or telephone relay service for individuals who are deaf or hard of hearing will be provided upon request. The County will make other appropriate accommodations to individuals with physical, developmental and learning disabilities and visual impairments.

Notification to Employees

Lake County notifies job applicants of its Equal Opportunity Policy on its Career Center webpage which includes the statement, “Lake County is an equal opportunity employer. Employment selection and related decisions are made without regard to sex, race, age,

disability, religion, national origin, color or any other protected class.”
(https://lakecountyil.silkroad.com/epostings/index.cfm?version=1&company_id=15924)

Further, the Lake County Employee Policies and Procedures handbook covers Equal Employment Opportunities, Affirmative Action Program, Harassment, and Americans with Disabilities Act in section 2.

Also, on the Lake County Intranet employee website, employees have access to EthicsPoint, which is an independent, third party that provides an anonymous and confidential method for Lake County to hear employee suggestions, concerns and to report misconduct. Employees are encouraged to use this site if they believe that there has been a violation of policies or standards. EthicsPoint is confidential and anonymous, unless the employee chooses to disclose their identity.

<https://secure.ethicspoint.com/domain/media/en/gui/22698/index.html>

Notification to Clients

Lake County will notify program clients of this Civil Rights Compliance Plan in various ways.

- This plan will be available for public review in offices that serve clients where the plan is required. The plan will be available in English and Spanish. Translation services (bilingual staff, language line services, Google translate) in languages other than English and Spanish will be made available upon request.
- The plan will be available on the County web-site.
- The existence of the plan will be disclosed in all significant publications that are distributed to program clients, applicants or potential applicants/clients.
- The plan will be distributed to all vendors whose services require compliance with it.

Complaint Resolution

If a person believes they have been discriminated against because of the person's race, color, national origin, sex, sexual orientation, age, religion, creed, political beliefs, status with regard to public assistance and/or disability, while applying for or receiving services from Lake County, he/she may file a complaint. He/she is encouraged to attempt to resolve the issue informally with the staff person involved and/or a supervisor. If unable to solve at that level, he/she has the right to file a complaint with the Director of Human Resources.

Procedure

Complaints should be addressed to:
Director of Human Resources
18 N. County St., 7th Fl.
Waukegan, IL 60085
847-377-2700

(1) A complaint should be filed in writing or verbally, containing the name and address of the person filing it, and briefly describing the allegations of non-compliance by Lake County or any actions by Lake County that would be prohibited by federal and state civil rights law.

(2) A complaint should be filed within 30 calendar days after the complainant becomes aware of the alleged violation. (Processing of allegations of discrimination which occurred before this grievance procedure was in place will be considered on a case-by-case basis.)

(3) An investigation, as may be appropriate, shall follow a filing of complaint. The investigation shall be conducted by the Director of Human Resources or his/her designee. Such investigations will be informal and thorough, affording all interested persons and their representatives, if any, an opportunity to submit evidence relevant to a complaint.

(4) A written determination as to the validity of the complaint and a description of the resolution, if any, shall be issued by the Director of Human Resources or his/her designee and a copy forwarded to the complainant no later than 15 calendar days after its filing.

(5) Human Resources shall maintain the files and records of Lake County relating to the complaints filed.

(6) The complainant can request a reconsideration of the case in instances where he or she is dissatisfied within the resolution. The request for reconsideration should be made within 5 calendar days to the County Administrator.

(7) The right of the person to prompt and equitable resolution of the complaint filed hereunder shall not be impaired by the person's pursuit of other remedies. Utilization of this grievance procedure is not a prerequisite to the pursuit of other remedies.

(8) These rules shall be construed to protect the substantive rights of interested parties to meet appropriate due process standards and to assure that Lake County complies with federal and state non-discrimination laws related to service delivery.

(9) The Director of Human Resources or his/her designee will submit information about the complaints that are filed with Lake County alleging discrimination in service delivery to the Office for Civil Rights (see below) and any other appropriate State or Federal Agency as required.

Office for Civil Rights
U.S. Department of Health and Human Services
Region V
233 N. Michigan Avenue, Suite 240
Chicago, IL 60601
(312) 886-2359 (Voice)
(312) 353-5693 (TTY/TDD)