

**POLICY AND PROCEDURE
CMP04- CIVIL RIGHTS ACT**

POLICY AND PROCEDURE	
TITLE: Civil Rights Act	
DEPARTMENT: Compliance	POLICY #: CMP04
EFFECTIVE DATE: 02/01/96	REVIEW/REVISION DATE: 07/05, 03/12, 02/13, 09/16, 10/18, 2/20
IMPACTED DEPARTMENT(S): Check all departments impacted by this policy <input type="checkbox"/> Administration <input type="checkbox"/> Human Resources <input type="checkbox"/> Claims <input type="checkbox"/> Information Technology <input type="checkbox"/> Compliance <input type="checkbox"/> Marketing <input type="checkbox"/> Customer Service <input type="checkbox"/> Medical Management <input type="checkbox"/> External Affairs <input type="checkbox"/> Provider Networks <input type="checkbox"/> Facilities <input type="checkbox"/> Project Management <input type="checkbox"/> Finance <input checked="" type="checkbox"/> ALL	
COMMITTEE APPROVAL DATE: 06/15, 01/19 Compliance: 03/2019	RETIRE DATE:
PRODUCT TYPE: Medi-Cal	REPLACES:

I. PURPOSE

The Health Plan of San Joaquin/Mountain Valley Health Plan (HPSJ/MVHP) Workforce and Delegates shall ensure compliance with Title VI of the Civil Rights Act of 1964 that prohibits discrimination on the basis of race, color, religion, and or national origin in programs and activities receiving federal financial assistance.

II. POLICY

- A. Under Title VI of the Civil Rights Act of 1964, any agency, program or activity that receives funding from the federal government may not discriminate on the basis of race, color or national origin.
- B. The U. S. Department of Health and Human Services Office of Civil Rights, in August 2000, issued “Policy Guidance on the Prohibition against National Origin Discrimination as it Affects Persons with Limited English Proficiency”, establishing “national origin” as applying to Limited English-speaking recipients of federally funded programs.
- C. The Department of Health Care Services (DHCS) contract prohibits discrimination on, “the grounds of race, color, creed, religion, ancestry, age, sex, national origin, marital status, sexual orientation, or physical or mental handicap” (Exhibit E, Attachment 2 Provision 28).
- D. The HPSJ/MVHP Workforce, Delegates and its providers, shall not discriminate against any person on the basis of race, color, national origin, disability, or age, in admission, treatment, or participation in its programs, services and activities, or in employment as described in the HPSJ/MVHP policy and procedure HR16 Equal Employment Opportunity.

III. PROCEDURE

- A. All provider contracts include a non-discrimination provision that incorporates the requirements of the Civil Rights Act of 1964.
- B. The HPSJ/MVHP Evidences of Coverage includes a non-discrimination provision that incorporates the requirements of the Civil Rights Act of 1964.
- C. The HPSJ/MVHP Workforce shall ensure compliance with the Civil Right Act of 1964 as required by law. Additionally, the HPSJ/MVHP Workforce shall refer to the HPSJ/MVHP Code of Conduct and Business Ethics.

IV. ATTACHMENT(S)

A. Not Applicable

V. REFERENCES

- A. Age Discrimination Act of 1975
- B. DHCS Contract Exhibit A, Attachment 9, Provision 12, Attachment 18, Provision 9.J., Exhibit E, Attachment 2, Provision 28
- C. HPSJ/MVHP Code of Conduct and Business Ethics
- D. HR16 Equal Employment Opportunity
- E. Section 504 of the Rehabilitation Act of 1973
- F. Title VI of the Civil Rights Act of 1964
- G. Title 45 Code of Federal Regulations Parts 80, 84, and 91

VI. REGULATORY AGENCY APPROVALS

DHCS approval was received on 3/2/12.

VII. REVISION HISTORY

STATUS	DATE REVISED	REVISION SUMMARY
Revised	10/18/18	Policy was updated to use the new P&P template and for clarity.
Review	01/16/19	PRC approval with edit of changing "staff" to "workforce" and clarify source of Title Vi definition
Review	02/17/20	No material changes made, removed glossary of terms to comply with policy template and updated format.
Revised	02/2020	Updated Workforce throughout policy to ensure consistent format.