

Civil Rights Considerations During COVID-19 Vaccine Distribution Efforts

To support FEMA’s efforts during the COVID-19 vaccine distribution efforts, FEMA’s Office of Equal Rights provides this checklist for as a tool to assist State, Tribal, and Territorial partners in understanding and fulfilling their obligations to provide access to vaccine-related programs, activities, and services in a nondiscriminatory manner.

Background

On March 13, 2020, the ongoing novel coronavirus (COVID-19) was declared a national emergency pursuant to the [Robert T. Stafford Disaster Relief and Emergency Act \(Stafford Act\)](#). The COVID-19 pandemic, like all emergencies, has affected people of different races and ethnicities, geographic areas and income levels. The Federal Emergency Management Agency (FEMA) is helping identify and fill resource gaps, using federal funding to accelerate state vaccination efforts and working to establish vaccine sites, in alignment with the President’s COVID-19 response plan. Equity is paramount to this effort and FEMA leaders across the country are working with states, tribes and territories to ensure underserved and historically marginalized communities are not left behind.

FEMA remains committed to its mission of *helping people before, during and after disasters* by ensuring access to its programs and services and enforcing civil rights. FEMA’s Office of Equal Rights is responsible for ensuring compliance with and enforcement of FEMA’s external Civil Rights obligations under the Stafford Act, Civil Rights Act, Rehabilitation Act, and Age Discrimination Act. FEMA also has responsibilities under [Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency](#), and [Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations](#).

This checklist of civil rights considerations is a tool to assist State, Tribal and Territorial partners understand and fulfill their civil rights obligations. The checklist is not required to be completed and submitted to FEMA, rather it is a comprehensive list of considerations for use to ensure vaccine distribution is equitable and accessible to all.

Civil Rights Considerations

Inclusive Planning

Item	Complete	Incomplete
Review community demographics data available through the U.S. Census Bureau and other sources to identify:		
1. Limited English proficient communities and languages for interpretation and translation of critical vaccination information;		



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2. Communities comprised of individuals who are unable to travel to vaccination sites because of lack of public transportation or other reasons, such as older adults, people without cars, people with disabilities;		
3. Communities without available or affordable internet access; and		
4. Other underserved communities.		
Develop outreach mechanisms resulting in engagement with community organizations and local partners that serve persons with disabilities, limited English proficiency, and underserved communities in the development and review of inclusive planning documents and messaging.		
Develop plans to ensure equitable access to information and vaccination sites for all communities, including underserved communities and those protected by law (e.g., race, color, national origin, religion, sex, age, disability, English proficiency and economic status).		
Develop plans to conduct vaccinations for communities unable to travel, including the use of accessible mobile units, to reach individuals most at-risk due to underlying health condition and rural or hard to reach communities.		
Develop messaging addressing concerns regarding site selection and accessibility, including exemptions to safety or health protocols due to underlying conditions or religious practices.		
Develop process for members of the public to file a complaint alleging a civil rights violation during vaccinations and messaging regarding process.		
Develop plans to increase accessible public transportation, through local community-based organizations, for individuals to travel to and from vaccination sites.		
Develop plans to support applicants in new virtual application processes, particularly communities without available or affordable internet access, including providing alternative methods (e.g., registration by phone, extended hours, multilingual services, and phasing registration periods by neighborhood) to ensure equitable availability.		
Develop plans for the proper disposal of medical and other waste to ensure it does not disproportionately affect any community.		
Develop a strategy to conduct outreach and engagement events or initiatives in communities recognized as having the highest exposure/infection rates.		

Effective Communication Access

Item	Complete	Incomplete
Identify and conduct community engagement events with community-based and civil rights organizations representative of a broad array of demographics, including underserved communities.		
Conduct community engagement events, virtually or in person, with sign language interpreters, captioning, use of plain language, and use of pictograms to reach people with low literacy.		
Conduct community engagement effort in communities without reliable internet adoption and/or access.		

Include information on how to obtain accessible formats of documents on all communications.		
Ensure electronic information and information technology is accessible (e.g., Alt Text, high contrast).		
Ensure non-discrimination statement and contact for civil rights complaints on all communication materials.		
Increase communication access through social media platforms in ways that are accessible to individuals with disabilities (e.g., Alt Text, Closed Captioned Videos).		
Develop plans for individuals who are unable to wear masks due to medical or other conditions or who require the removal of masks to communicate.		

Language Access

Item	Complete	Incomplete
Provide high quality, accurate and timely translations of vaccine site related information into commonly used languages in the community, based on your review of community demographics.		
Provide qualified interpreters at community engagement events for commonly used languages.		
Provide qualified interpreters at vaccination sites or by telephone for commonly used languages. Note: Use of a family member, friend, or minor is strongly discouraged due to potential issues regarding competency, confidentiality, or conflict of interest.		
Include information on how to obtain translated documents on all communications.		
Plan for the increased need for accessible and multilingual messaging and communications through available ethnic media outlets, wireless emergency communications, and use of virtual townhalls for coordinated communications.		

Physical Accessibility

Item	Complete	Incomplete
Ensure a portion of meeting and vaccination sites are accessible by public transportation.		
Ensure meeting and vaccination sites are compliant with ADA accessibility requirements.		
Document areas of noncompliance with ADA requirements and modifications made.		
Ensure mobile vaccination units are accessible.		
Ensure vaccination centers are equipped with assistive technology for individuals with disabilities who need effective communication access, such as ASL or texting through cell phones.		

Pre-identify locations to account for the care of individuals requiring additional assistance, including older adults, individuals with physical and cognitive disabilities and others with access and functional needs.		
Develop plans to provide reasonable accommodations, including persons who are unable to wear a facemask due to a disability.		
Ensure meeting and vaccination sites offer services to individuals with disabilities in the most integrated setting appropriate.		

Contact Us

If you have questions or would like assistance in completing any checklist item, please contact the External Civil Rights Division within FEMA’s Office of Equal Rights. FEMA-CivilRightsOffice@fema.dhs.gov

Civil Rights Complaints and Concerns

Members of the public may bring civil rights complaints to OER’s attention in connection with FEMA programs and activities or FEMA-funded or -assisted programs and activities as follows:

- Call the FEMA Office of Equal Rights at 202-212-3535 and press 1; or for TTY users, call 800-462-7585
- Send an email to the FEMA Office of Equal Rights: FEMA-CivilRightsOffice@fema.dhs.gov
- Mail a complaint to the FEMA Office of Equal Rights:
 FEMA Office of Equal Rights
 C Street, SW, Room 4SW-0915
 Washington, DC 20472-3505

Resources

- FEMA Civil Rights Bulletin, Ensuring Civil Rights During the COVID-19 Response ~ www.fema.gov/media-library-data/1586893628400f21a380f3db223e6075eeb3be67d50a6/EnsuringCivilRightsDuringtheCOVID19Response.pdf.
- FEMA Vaccine Support Site ~ www.fema.gov/disasters/coronavirus/vaccine-support
- DHS Office for Civil Rights and Civil Liberties Webpage, Civil Rights in Emergencies and Disasters ~ www.dhs.gov/civil-rights-emergencies-and-disasters.
- EEOC Technical Assistance Questions and Answers, What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws - www.eeoc.gov/wysk/what-you-should-know-about-covid-19-and-ada-rehabilitation-act-and-other-eeo-laws?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=
- HHS Ensuring Language Access and Effective Communication During Response and Recovery: A Checklist for Emergency Responders ~ www.hhs.gov/sites/default/files/lang-access-and-effective-comm-checklist-for-emergency-responders.pdf
- Census Bureau Community Resilience Estimates ~ www.census.gov/data/experimental-data-products/community-resilience-estimates.html and <https://uscensus.maps.arcgis.com/apps/opsdashboard/index.html#/f8fc348e4c99498baf18af09d4401553>
- Census Bureau Press Release, Census Bureau Reports at Least 350 Language Spoken in U.S. Homes ~

www.census.gov/newsroom/press-releases/2015/cb15-185.html

- HHS Telehealth Webinar for Community-Based Organizations ~ www.phe.gov/emergency/events/COVID19/atrisk/CBO-series/Pages/Addressing-Barriers.aspx
- HHS Meeting the Needs of At-Risk Individuals ~ www.phe.gov/emergency/events/COVID19/atrisk/Pages/default.aspx
- HHS Federal Programs Supporting Individuals Experiencing Homelessness ~ www.phe.gov/emergency/events/COVID19/atrisk/Documents/Federal-Homelessness-Programs-FAQ.pdf
- HHS Information on Federal Programs to Sustain Nutrition for At-Risk Individuals ~ www.phe.gov/emergency/events/COVID19/atrisk/Documents/Federal-Homelessness-Programs-v2.pdf
- FCC Section 706 Fixed Broadband Deployment Map ~ www.fcc.gov/reports-research/maps/section-706-fixed-broadband-deployment-map/

Alternative Formats

For copies of FEMA documents in alternative formats, please call 800-621-3362 (TTY: 800-462-7585).

If you speak a language other than English and need help with this document, please call 800-621-3362 (TTY: 800-462-7585) and you will be connected to an interpreter who will assist you at no cost.

Si habla un idioma diferente al inglés y necesita ayuda con este documento, llame al 800-621-3362 (TTY: 800-462-7585) y lo contactaremos con un intérprete que lo ayudará sin costo alguno para usted.

Если вы не говорите на английском языке и нуждаетесь в помощи, позвоните по номеру 800-621-3362 (TTY: 800-462-7585). Вас соединят с переводчиком, который бесплатно поможет вам.

Se você fala um idioma além do inglês e precisa de ajuda em relação a este documento, ligue para 800-621-3362 (TTY: 800-462-7585) e você será conectado a um intérprete que irá ajudá-lo sem nenhum custo adicional.

Nếu quý vị nói một ngôn ngữ khác Tiếng Anh và cần giúp đỡ với tài liệu này, hãy gọi 800-621-3362 (TTY: 800-462-7585) và quý vị sẽ được kết nối với một thông dịch viên, là người sẽ trợ giúp miễn phí cho quý vị.

영어를 사용하지 못하는 사람으로써 본 문서에 대해 도움이 필요할 경우, 전화 800-621-3362 (텔레타이프라이터: 800-462-7585)로 연락주시면 여러분을 무료로 도와줄 통역사와 연결해 드립니다.

Si vous parlez une langue autre que l'anglais et que vous avez besoin d'aide en rapport avec le présent document, veuillez composer le 800-621-3362 (numéro TTY pour les malentendants : 800-462-7585) pour qu'un interprète soit gratuitement mis à votre disposition.

Si w pale yon lang ki pa lang Angle e ou bezwen èd avèk dokiman sa a, tanpri rele 800-621-3362 (TTY: 800-462-7585) epi yo pral konekte w ak yon entèprèt ki pral ede w, gratis.

英語以外の言語でこのページの詳細をお知りになりたい方は、お電話で800-621-3362 (TTY: 800-462-7585) までお問い合わせください。無料で通訳をご利用いただけます。

Kung nagsasalita ka ng wikang bukod sa Ingles at nangangailangan ng tulong sa dokumentong ito, mangyaring tumawag sa 800-621-3362 (TTY: 800-462-7585) at maikokonekta ka sa isang interpreter (tagasalin sa wika) na tutulong sa iyo nang walang bayad.

如果您使用除英语之外的其他语言并且就本文件需要帮助，请致电800-621-3362（听障及语障用户（TTY）：800-462-7585），您将 与翻译人员联系，该翻译人员将为您提供免费帮助。

إذا تـنـكـمـلـكـتـتـمـعـلـرـيـغـالـإنـكـلـيـزـيـةـواـحـتـجـتـإـلىـمـسـاعـدـةـعـمـكـالـتـالـفـالـوـثـيـقـةـ،ـيـجـرـيـالـاـتـصـالـمـقـرـلاـبـ3362-621-800 (الطـبـاعـة

ن.ء.دعبي: 7585-462-800) وسيتـمـوصـلـكـعـمـمـجـرـتـمـيـهـفـشـسـيـقـدـمـكـلـالمـسـاعـدـةـأناجم