Civil Rights Responsibilities and Requirements for GCC Grantees

As a recipient of Department of Justice federal funds, your organization is required to comply with civil rights requirements. These requirements encompass several areas, including training, reporting, responding to discrimination complaints, and having policies and procedures for your organization. As a grantee, you should refer to the reference document written for grantees (the *Civil Rights Information for GCC Grantees)* document, accessible at http://www.ncdps.gov/gccforms to find further information about the requirements for grantees.

Discrimination Complaints.

Your organization is required to respond to complaints of discrimination from individuals or groups (i.e. program beneficiaries, subrecipient beneficiaries, or subrecipient agency employees) who are aggrieved by your agency or any agency receiving funds through this grant. A discrimination complaint may be related to a claim to have been denied the benefits of, excluded from participation in, subjected to discrimination under, or denied employment in connection with any program or activity, on the basis of race, color, religion, national origin, sex, gender identity, sexual orientation, disability or age.

Your policies and procedures should direct aggrieved persons in the process and forms for submitting a discrimination complaint. You can find additional information on filing a discrimination complaint and copies of the GCC Discrimination Consent and GCC Discrimination Complaint Forms at:http://www.ncdps.gov/gccforms

Civil Rights Notice

In addition, you must post your agency's nondiscrimination policy and the procedure for filing a civil rights complaint prominently in your organization and display it on all forms of communication available to the public regarding program availability. Following is a short statement that can be used to express your compliance with this federal requirement.

NOTICE of NONDISCRIMINATION RIGHTS and PROTECTIONS to BENEFICIARIES

<Your Organization Name> operates its program, services and activities in compliance with federal nondiscrimination laws. No person shall, on the basis of race, color, national origin (including limited English proficiency), disability, religion, sex, gender identity, sexual orientation, or age, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any of our programs.

To file a complaint of discrimination, write Office of Civil Rights, Office of Justice Programs,

U.S. Department of Justice (OCR), 810 7th Street, NW, Washington, DC 20531 or call 202-307-0690 (Voice) or 202-307-2027 (TDD/TTY). Individuals who are hearing impaired or have speech disabilities may also contact OCR through the Federal Relay Service at 800-877-8339 (TTY), 877-877-8982 (Speech) or 800-845-6136 (Spanish).

Limited English Proficiency

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of national origin. Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" requires all recipients of federal financial assistance to provide meaningful access to Limited English Proficient (LEP) persons. GCC grantees receiving federal funds are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. LEP guidance and requirements for grantees receiving federal funds can be found online at: https://ojp.gov/about/ocr/lep.htm

Civil Rights Training

Training and technical assistance on federal civil rights laws is available through the Office of Civil Rights (OCR). Online training on federal civil rights laws is accessible at https://ojp.gov/about/ocr/ocr-training-videos/video-ocr-training.htm GCC requires that the Project Directors (or their designees) view the online training videos as part of the award process and complete the attached form to certify that they have completed their training and are aware of their Civil Rights responsibilities and requirements.

Grant Monitoring

To ensure subrecipient compliance with applicable federal civil rights laws, GCC's grants monitoring staff will ask you questions and request documentation to complete the Civil Rights Compliance Checklist (disseminated by OJP). This checklist will be completed during your regular on-site monitoring visit conducted by GCC staff. The goal of the checklist is to assist GCC grants managers in ensuring that GCC subrecipients are in compliance with all applicable federal civil rights laws. On-site monitoring visits will occur as prescribed in GCC's agency-wide monitoring policy.

Equal Employment Opportunity Plan Reporting

An Equal Employment Opportunity Plan (EEOP) is a workforce report that some organizations must complete as a condition for receiving Justice Department funding authorized by the Omnibus Crime Control and Safe Streets Act of 1968. The EEOP's purpose is to ensure that recipients of financial assistance from the Justice Department are providing equal employment opportunities to men and women regardless of sex, race or national origin. Federal regulations establishing the EEOP requirement also link a diverse workforce to effective law enforcement.

As a recipient of Department of Justice funding, your organization may also be required to submit a Certification Report or the Utilization Report portion of your EEOP to the Office for Civil Rights. Based on the following requirements, you are responsible for either completing the

EEOP Certification Form and submitting it to the appropriate authorities or developing and maintaining an agency EEOP and submitting it to the appropriate authorities.

The following table shows at a glance a recipient's EEOP reporting responsibilities:

What is the recipient type?	What is the award amount?	What is the number of employees?	Does the recipient need to develop an EEOP?	Does the recipient need to submit a Certification Form to OCR?	Must the recipient submit an EEOP to OCR?
Nonprofit, Indian Tribe, Medical or Education Institution	Does not matter	Does not matter	NO	YES (Section A)	NO
State or local government and private entity	Less than $25,000	Does not matter	NO	YES (Section A)	NO
State or local government and private entity	Does not matter	Less than 50 employees	NO	YES (Section A)	NO
State or local government and private entity	$25,000 or more, but less than $500,000, for an individual grant	50 or more employees	YES	YES (Section B), certifying that the recipient has created an EEOP and is maintaining it on file in a designated office for review by employees, applicants, OCR or a state administrative agency	NO
State or local government and private entity	$500,000 or more for an individual grant	50 or more employees	YES	NO	YES

GCC provides the Certification Form to potential recipients as part of the grant award process. The form may also be found online at: http://www.ncdps.gov/gcc. The EEOP Certification Form must be completed and returned to GCC in order to process your award. Your grant award will not be moved to "open" status until both the Standard Conditions (which contains EEO and discrimination conditions required by the federal awarding agency) and the EEO Certification Form have been completed, signed, and returned.

If your organization is required to develop an EEOP Utilization Report and has received a single award for $500,000 or more, whether directly from the Justice Department or indirectly from a

state or local agency, you must send the EEOP Utilization Report to OCR for review. The mailing address to send the report is as follows:

> Attn: EEOP Utilization Report Submission
> Office for Civil Rights
> Office of Justice Programs
> U.S. Department of Justice
> 810 Seventh Street, NW
> Washington, DC 20531

If you need additional assistance with preparing the report or completing the form, The Equal Employment Opportunity Plan Reporting Tool provides a step-by-step method and guidance for completing the EEO Utilization Report and/or Certification Form. The tool can be found online at https://ocr-eeop.ncjrs.gov/_layouts/15/eeopLogin2/customLogin.aspx?ReturnUrl=%2f_layouts%2f15%2fAuthenticate.aspx%3fSource%3d%252F&Source=%2F: If you have questions regarding EEO Program requirements, visit the DOJ Office for Civil Rights (OCR) website at: www.ojp.gov/about/ocr/eeop