



OCJS METHODS OF ADMINISTRATION FOR ENSURING SUBRECIPIENTS COMPLY WITH APPLICABLE FEDERAL CIVIL RIGHTS LAWS

I. PURPOSE

To provide a method of administration for ensuring OCJS's grant recipients, who have received federal funding from the U.S. Department of Justice (DOJ) comply with applicable Federal Civil Rights Laws.

II. POLICY

OCJS developed a policy for receiving complaints from grant recipients and/or people who are receiving funding services (*Appendix A*).

OCJS shall accept and acknowledge all discrimination complaints and employment discrimination complaints from clients, customers, program participants, or consumers of OCJS or OCJS grant recipients, employees and job applicants. All discrimination allegations and complaints shall be referred to the designated Civil Rights Complaint Coordinator at OCJS, Carol Ellensohn, Chief Policy Advisor.

A client, customer, program participant or consumer may file a complaint of discrimination via email to the appropriate OCJS Grant Coordinator (grant coordinator email addresses are listed on the OCJS website at www.ocjs.ohio.gov) or via U.S. Mail directly to the attention of the OCJS Civil Rights Complaint Coordinator, Carol Ellensohn, 1970 W. Broad St., Columbus, OH 43223. The complaint should include the complainant's name, contact information, and a brief explanation of the alleged discrimination. If a civil rights complaint is sent to the OCJS Grant Coordinator, that employee shall forward it immediately to the OCJS Civil Rights Complaint Coordinator.

The OCJS Civil Rights Complaint Coordinator shall provide an acknowledgement of the complaint to EEOC, OCR, OCRDC, or other appropriate agency. The complaint shall be investigated by the appropriate agency.

All clients, customers, program participants, or customers of OCJS or OCJS grant recipients shall have access to these procedures at any time via the OCJS website (www.ocjs.ohio.gov). Any client, customers, program participant, or consumer may choose to file a complaint directly with the EEOC, OCR, OCRC, or other appropriate agency as opposed to filing with OCJS. If a complaint is filed directly with the outside agency, OCJS requests that a courtesy copy be forwarded to the OCJS Civil Rights Complaint Coordinator by the complainant.

III. NOTIFYING SUBRECIPIENTS OF CIVIL RIGHTS REQUIREMENTS

OCJS subrecipients are notified of their civil rights and non-discrimination obligations upon acceptance of the grant award. The OCJS Standard Federal Subgrant Conditions is a handbook for agencies that receive grant funds from OCJS. The handbook outlines the terms and conditions required of grant programs. Funded projects must administer their grants in accordance with these administrative and fiscal conditions. Failure to comply with these requirements may result in the withholding or disallowance of grant payments, the reduction or termination of the grant award and/or the denial of future grant awards. All agencies that receive grant funds for programs must also comply with the applicable Program Guidelines and Request for Proposals (RFP). In the event such guidelines or RFP are inconsistent with the provisions of the Handbook, individual program guidelines or RFP shall be interpreted and construed as superseding the provision of this Handbook.

IV. TRAINING SUBRECIPIENTS ON CIVIL RIGHTS REQUIREMENTS

Beginning in January 2013, all OCJS funded subrecipients will be required to take OCJS's orientation training which includes the Office of Justice Program's on-line civil rights training course and an OCJS training course on the guidelines for successfully administering a grant.

The online trainings will be conducted through an Ohio Department of Public Safety portal in which OCJS can verify that subrecipients have completed the training courses and the exact amount of time spent on the material. If a subrecipient has not reviewed the training courses within the allocated timeframe, OCJS will notify the agency of its training non-compliance. If a subrecipient continues to have compliance issues with respect to the training, OCJS will then begin implementing non-compliance sanctions which could include termination of the grant award.

V. MONITORING FOR COMPLIANCE WITH CIVIL RIGHTS REQUIREMENTS

OCJS has implemented a three-part compliance process to ensure and monitor subrecipients compliance with Civil Rights requirements.

- (1) Subrecipients are required to take the on-line training courses as stated in Section IV.
- (2) Subrecipients will be required to complete and submit an annual Civil Rights Compliance Questionnaire (*Appendix B*). This questionnaire requires subrecipients to describe how they are meeting their federal civil rights obligations. The questionnaire will be included in a subrecipient's grant notification packet and must be returned to their OCJS Grant Coordinator or to the OCJS Civil Rights Complaint Coordinator within forty-five (45) days of their grant start date. Additionally, onsite monitors of the Grants Monitoring and Fiscal Compliance section will request updated information from subrecipients on their civil rights compliance during fiscal monitoring visits and then forward that information to the OCJS Civil Rights Complaint Coordinator (*Appendix C*).
- (3) Prior to officially closing out the grant, the OCJS Grant Coordinators will complete a checklist verifying the project has submitted the questionnaire reporting any civil rights allegations. Upon successful verification, OCJS will then issue the grant closeout notice and officially close the grant.