



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: <https://www.ncdps.gov/about-dps/boards-and-commissions/governors-crime-commission/submit-compliance-forms-governors-crime-commission>

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://www.ojp.gov/program/civil-rights-office/limited-english-proficient-lep>

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/program/civil-rights/video-training-grantees/overview> GCC requires that the Project Directors (or their designees) view the online training videos as part of the award process and complete the *101B Civil Rights Compliance Self Certification for GCC Grantees* form to certify that they have completed their training and are aware of their Civil Rights responsibilities and requirements. GCC also provides additional civil rights training at the Grant Award workshop.

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 GCC on behalf of 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. The checklist is also available on the GCC website at: <http://www.ncdps.gov/gccforms>

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. The EEOP Report Builder User Guide can be found online at: https://www.ojp.gov/EEORReportTool_JobAid.

The DOJ Office of Civil Rights (OCR) has developed the EEOP Utilization Report to help recipients comply with the EEOP regulations. Instead of requiring recipients to report all of the

employment data that federal regulations require them to keep (see [28 C.F.R. § 42.301-.308](#)), OCR uses the Report to prompt recipients to collect and analyze key employment data, organized by race, national origin and sex. OCR also uses the Report as an initial screening tool. If OCR's review of an agency's Report indicates that a more thorough examination of employment practices may be appropriate, it may request that the recipient provide additional employment data.

The requirement to develop, maintain and submit an Equal Employment Opportunity Plan derives from federal regulations of the Safe Streets Act. Recipients who have received funding under this Act must comply with EEOP requirements, as do funding recipients under the Juvenile Justice and Delinquency Prevention Act. The Office for Victims of Crime has made compliance with the EEOP requirements a condition for the Victims of Crime Act awards. Other recipients of federal assistance are not bound by EEOP regulations.

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 EEOP is effective for a two-year period, commencing with the date of the approval letter from OCR.

The following table shows at a glance a recipient or subrecipient'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

The EEO Report Builder (found online at: <https://eeop.ocr.ojp.gov/certsub/homepage>) is designed to assist recipients of DOJ financial assistance with meeting some of their related civil rights reporting requirements. Compliance with various federal civil rights standards and reporting is a condition of accepting federal financial assistance. Failure to meet these requirements could result in loss of current and/or future funding.

This tool will provide agency staff with a step-by-step method for preparing and completing their EEO Utilization Report and/or Verification Form. If you have questions regarding EEO Program requirements, visit the DOJ Office for Civil Rights (OCR) website at: <https://www.ojp.gov/program/civil-rights-office/equal-employment-opportunity-plans>. If you have problems navigating the system please refer to the [EEO Report Builder Job Aid](#).

Once your agency has submitted their report to OCR, you should copy the screenshot of your submission, sign and date it, and return it to GCC with your other agency profile documents in the document portal 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.