

## Sample Federal Civil Rights Compliance Checklist for Use by Recipients

1. Has the subrecipient submitted a Certification Form to the OCR certifying compliance with the Equal Employment Opportunity Program (EEO) requirements?

Yes No

If yes, on what date did the subrecipient submit the Certification Form?

2. If the subrecipient is required to prepare a written EEO Plan in accordance with 28 C.F.R. pt. 42, subpt. E, does the subrecipient have an EEO Plan on file for review? (If a subrecipient is unsure as to whether they are required to prepare a written EEO Plan, they can find out at <https://ojp.gov/about/ocr/eeop.htm>, where they can also prepare and file their EEO Plan electronically).

Yes No

If yes, on what date did the subrecipient complete the EEO Plan?

3. If the subrecipient is required to submit an EEO Utilization Report to the Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ) in accordance with 28 C.F.R. pt. 42, subpt. E, has the subrecipient done so? (If a subrecipient is unsure as to whether they are required to prepare a written EEO Plan, they can find out at <https://ojp.gov/about/ocr/eeop.htm>, where they can also prepare and file their EEO Plan electronically).

Yes No

If yes, on what date did the subrecipient submit the EEO Utilization Report?

If yes, what is the date of the subrecipient's most recent EEO Utilization Report Approval Letter?

4. How does the subrecipient notify program participants and beneficiaries (e.g., through brochures, postings, or policy statements) that it does not discriminate in the delivery of services or benefits based on race, color, national origin, religion, sex, disability, and age (as well as sexual orientation and gender identity if the subrecipient receives funding from the Office on Violence Against Women (OVW) or under the Violence Against Women Act (VAWA) of 1994, as amended)?

Comments:

5. How does the subrecipient notify employees and prospective employees (e.g., through advertisements, recruitment materials, postings, dissemination of orders or policies) that it does not discriminate on the basis of race, color, national origin, religion, sex, and disability (as well as sexual orientation and gender identity if the subrecipient receives funding from OVW or under VAWA)?

Comments:

6. Does the subrecipient have written policies or procedures for notifying employees and applicants on how to file complaints alleging discrimination by the subrecipient?

Yes No

If yes, explain these policies and procedures.

7. Does the subrecipient have written policies or procedures for notifying program participants and beneficiaries on how to file complaints alleging discrimination by the subrecipient, including how to file complaints with the [State Administering Agency] and the OCR?

Yes No

If yes, explain these policies and procedures.

8. If the subrecipient has fifty or more employees and receives DOJ funding of \$25,000 or more, has the subrecipient taken the following actions:

- a. Adopted grievance procedures that incorporate due process standards and provide for the prompt and equitable resolution of complaints alleging a violation of the DOJ regulations implementing Section 504 of the Rehabilitation Act of 1973, found at 28 C.F.R. pt. 42, subpt. G, which prohibit discrimination on the basis of disability in employment practices and the delivery of services?

Yes No

- b. Designated a person to coordinate compliance with the prohibitions against disability discrimination contained in 28 C.F.R. pt. 42, subpt. G?

Yes No

- c. Notified program participants, beneficiaries, employees, applicants, and others that the subrecipient does not discriminate on the basis of disability?

Yes No

Comments:

9. If the subrecipient operates an educational program or activity, has the subrecipient taken the following actions:

a. Adopted grievance procedures that provide for the prompt and equitable resolution of complaints alleging a violation of the DOJ regulations implementing Title IX of the Education Amendments of 1972, found at 28 C.F.R. pt. 54, which prohibit discrimination on the basis of sex?

Yes No

b. Designated a person to coordinate compliance with the prohibitions against sex discrimination contained in 28 C.F.R. pt. 54?

Yes No

c. Notified applicants for admission and employment, employees, students, parents, and others that the subrecipient does not discriminate on the basis of sex in its educational programs or activities?

Yes No

Comments:

10. Has the subrecipient complied with the requirement to submit to the OCR any adverse findings of discrimination against the subrecipient based on race, color, national origin, religion or sex that are the result of a due process hearing conducted by a federal or state court or a federal or state administrative agency?

Yes No

Comments:

11. What steps has the subrecipient taken to provide meaningful access to its programs and activities to persons who have limited English proficiency (LEP)?

Comments:

12. Does the subrecipient have a written language-access policy on providing services to LEP persons?

Yes No

13. Does the subrecipient conduct any training for its employees on the requirements of applicable federal civil rights laws?

Yes No

Comments

14. Does the subrecipient provide federally funded services to eligible beneficiaries regardless of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice?

Yes No

15. If the subrecipient engages in explicitly religious activities, does the subrecipient:

a. Separate the explicitly religious activities in either time or location from the federally funded activities?

Yes No

b. Ensure that participation in the explicitly religious activities is voluntary for participants in the federally funded program?

Yes No

Comments:

16. If the subrecipient is a religious institution or a faith-based organization, does the subrecipient:

a. Provide appropriate notice to program beneficiaries or prospective beneficiaries that the subrecipient does not discriminate on the basis of religion in the delivery of services or benefits?

Yes No

- b. Provide appropriate notice to program beneficiaries or prospective beneficiaries that if they object to the “religious character” of the subrecipient, the subrecipient will make a reasonable effort to find an acceptable alternative provider in close geographic proximity that offers comparable services?

Yes No

- c. Keep a record of the requests for an alternative provider from beneficiaries or prospective beneficiaries who object to the subrecipient’s “religious character,” noting the subrecipient’s efforts to find an appropriate alternative provider and to follow up with the beneficiary or prospective beneficiary?

Yes No

Comments:

17. If the subrecipient receives funding under VAWA or from OVW, does the subrecipient serve male victims of domestic violence, dating violence, sexual assault, and stalking?

Yes No

Comments:

18. If the subrecipient receives funding under VAWA or from OVW, does the subrecipient provide sex- segregated or sex-specific services?

Yes No

If yes, describe how the services are sex-segregated or sex-specific.

If yes, has the subrecipient determined that providing services that are sex-segregated or sex specific is necessary to the essential operation of the program?

Yes No

If yes, describe how the subrecipient determined that providing sex-segregated or sex-specific services is necessary to the essential operation of the program.