

<b>Subject:</b> Methods of Administration to Ensure Civil Rights Compliance of Subrecipients under U.S. Department of Justice Grant Programs
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<b>Policy Number:</b> 20-01
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<b>Effective Date:</b> December 8, 2020
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## **I. Purpose**

The purpose of this document is to establish Methods of Administration (MOA) to ensure compliance by subrecipients with their civil rights obligations under U.S. Department of Justice (DOJ) grant programs.

## **II. Policy**

All employees, applicants, clients, customers and program participants of Hendry County's subrecipients shall be treated equally regardless of race, color, national origin, sex, sexual orientation, gender identity, religion, age or disability. The Second Amended and Restated Title VI and Nondiscrimination Policy and Plan adopted by the Hendry County Board of County Commissioners on December 17, 2019, is hereby incorporated herein by reference. The County will endeavor to ensure that subrecipients comply with all applicable federal laws regarding discrimination. To inform all employees, applicants, clients, customers and program participants of the County's subrecipients of these MOA, the County will post them on the County website and on the bulletin board in the County Administration Building where other civil rights notices are posted.

## **III. Definitions**

"Complaint coordinator" shall refer to Hendry County's Human Resources Director.

"Discrimination" shall mean unfair treatment of a person due to his or her race, color, national origin, sex, sexual orientation, gender identity, religion, age or disability.

"Subrecipient" shall mean an entity receiving funding from Hendry County pursuant to a U.S. Department of Justice grant program.

## **IV. Complaint Procedures**

Any County employee receiving a discrimination complaint or becoming aware of discrimination by a subrecipient shall promptly forward the complaint to the complaint coordinator.

The complaint coordinator shall initially investigate any discrimination complaint. If the complaint coordinator can resolve the complaint, he or she shall notify the Office for Civil Rights (OCR), Office of Justice Programs, DOJ, of the investigation and outcome. If the complaint coordinator is unable to investigate the complaint or reach a resolution or the

party allegedly subjected to discrimination requests that an alternative entity perform the investigation, the complaint coordinator shall refer the discrimination complaint to the U.S. Equal Employment Opportunity Commission (EEOC), the appropriate state or local fair employment practices agency or human rights commission, or the OCR. A party allegedly subjected to discrimination may also file a complaint directly with the OCR at the following address: Office for Civil Rights, Office of Justice Programs, U.S. Department of Justice, 810 Seventh St., N.W., Washington, D.C. 20531. The complaint coordinator shall notify the OCR in writing when the complaint coordinator refers a complaint to the EEOC or a state or local fair employment practices agency or human rights commission.

The County will ensure that subrecipients have procedures in place for responding to discrimination complaints that employees, applicants, clients, customers and program participants of a subrecipient file directly with the subrecipient. At a minimum, these procedures should include forwarding the complaint to the complaint coordinator, or to the OCR, EEOC or a state or local fair employment practices agency or human rights commission and notifying the County of this referral. The procedures must allow complainants to file a complaint of discrimination directly with the County or with the OCR.

## **V. Training**

The County will train County employees on the complaint procedures by providing a copy to all County employees and posting the procedures on the County's website on the Human Resources Department's homepage.

The County will ensure that subrecipients are aware of their civil rights obligations and the complaint procedures by posting the procedures on the County's website and providing to subrecipients a copy of these MOA and the U.S. Department of Justice, Office of Justice Programs, civil rights requirements at a training session provided at least once per grant award period.

## **VI. Monitoring**

The County will monitor for subrecipients' compliance with their civil rights obligations by requesting, at least once during each grant period, copies of subrecipients' nondiscrimination policies and requesting that any revisions be made that are necessary to make the policies compliant with U.S. Department of Justice requirements. Additionally, in the event a discrimination complaint is filed against a subrecipient, the County will meet with the subrecipient to review all civil rights requirements and the subrecipient's policies and practices to guard against violating civil rights laws.